



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

CHRIS CHRISTIE
Governor

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Lt. Governor

CHRISTOPHER D. CERF
Commissioner

June 28, 2013

Mr. Michael Kopakowski, Superintendent
Middle Township School District
216 South Main Street
Cape May Court House, NJ 08210

Dear Mr. Kopakowski:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Middle Township Board of Education**. 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, 2011 through December 17, 2012. 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/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Middle 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 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 Anthony Hearn at (609) 633-2492.

Sincerely,

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

RJC/AH/dk:Middle Township BOE Cover Letter/consolidated monitoring
Enclosures

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MIDDLE TOWNSHIP SCHOOL DISTRICT
216 S. MAIN STREET
CAPE MAY COURT HOUSE, NJ 08210
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JUNE 2013**

District: Middle Township School District
County: Cape May
Dates On-Site: December 17 and 18, 2012
Case #: CM-016-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 561,376
IDEA Basic	574,025
IDEA Preschool	26,986
Title IIA	110,730
Race to the Top	35,500
Carl D. Perkins	21,043
Total Funds	<u>\$ 1,329,660</u>

**MIDDLE TOWNSHIP SCHOOL DISTRICT
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BACKGROUND

The Elementary & 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 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 Middle Township School District 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 following programs: Title I, Part A (Title I); Title IIA; Race to the Top, Carl D. Perkins (Perkins) and IDEA for the period July 1, 2011 through December 17, 2012.

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 (IEP), 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 district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants that were reviewed included Title I, Title IIA, Race to the Top, Perkins and IDEA from July 1, 2011 through December 17, 2012. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA, CARL D. PERKINS
AND RACE TO THE TOP FUNDS**

Title I Projects

The district is using its FY 2012-2013 Title I funds to implement targeted assistance programs in all schools in the district. Primarily, the district provides tutoring services through an extended learning opportunities (extended day and extended year), as well as in-class support. Prior year funds were spent on similar programs and technology equipment.

IDEA Projects (Special Education)

The majority of the FY 2012-2013 IDEA Basic funds are being used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. Additional IDEA funds are being used for the contracted services of a behavioral consultant, to purchase assistive technology devices, education software for use by students receiving special education and related services and technical support for the database program.

Nonpublic funds are being used to provide supplemental instruction and initial evaluations for students attending nonpublic schools.

Carl D. Perkins

The district's FY 2011-2012 Perkins grant was utilized to obtain supplies, support Career and Technical Student Organization (CTSO) development, upgrade technology and pay stipends for career and technical student organization advisors and a grant administrator. The district's FY 2012-2013 Perkins grant is intended to support similar items for Career and Technical Education (CTE) programs.

Race to the Top

The majority of the FY 2012-2013 Race to the Top grant is being used to implement a teacher evaluation system.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: In the notification letter to parents of Title I students in the elementary and middle school, the district did not inform parents of the remediation approach or the exit criteria for Title I students. Also, the district did not issue notification letters to parents of Title I students in high school. The notification letter is necessary for parents to understand the reasons for the child's placement in the Title I program and the actions the school is providing to address their child's needs.

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

Required Action: In the notification letter to families of students in the Title I program, the district must include remediation and exit criteria, and the district must develop the letter for parents of high school students that are participating in the Title I program. The notification letters must be revised for FY 2013-2014 and the district must submit a copy of the letters to the NJDOE for review.

Finding 2: For the 2012-2013 school year, there is no evidence the school distributed the "opt-out" form to parents and adult students regarding Title IX: Access to High School Students and Information on Students by Military Recruiters.

Citation: NCLB §9528: *Access to High School Students and Information on Students by Military Recruiters*.

Required Action: For the 2013-2014 school year, the district must distribute the "opt-out" letter and form to the parents of high school students, and adult students. The district must submit a copy of the letter to the NJDOE for review.

Finding 3: The district does not have the required supporting documents to verify the activity of school and district level staff charged to the Title I, Title IIA or IDEA grants. The documentation must reflect what the staff is doing, when (time slots) and where (school or central office) and must match their funded percentage. This documentation is necessary to ensure grant funded staff are performing grant-related responsibilities.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

Required Action: The district must identify staff members whose salaries are supported in whole or in part with Title I, Title IIA or IDEA funds and verify the time and activity of staff charged to the grant. The district must submit a revised list of FY 2012-2013 funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review (including administrative staffing).

Finding 4: The district's use of Title I funds for the expenditures below supplants state and local funds.

GRANT YEAR	VENDOR	REASON	AMOUNT
2011-2012	Dell-Computers	Items purchased for use by administrative office staff and for use in a non-Title I funded school (School #2)	\$9,194.79
2011-2012	SJ Tech-8 Smart Boards	Items purchased for use in a non-Title I school (School #2)	\$35,160.00

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GRANT YEAR	VENDOR	REASON	AMOUNT
2011-2012	Apple-iPads	Items purchased for use by all students in the school, not just the Title I students	\$11,000.00
2011-2012	FedEx-printing services	Expenditure benefits the high school, a non-Title I funded school	\$1,401.34
2011-2012	Oncourse-Planners	Expenditure benefits all staff, not just Title I funded staff	\$2,000.00
2011-2012	Renaissance Learning-Accelerated Reading	Item purchased for use by all students in School #4, not just the Title I students	\$2,248.45
2011-2012	Learning Focused-Power Curriculum license	Expenditure is a district responsibility	\$1,000.00
2011-2012	Heineman-library books	Expenditure benefits all students, not just Title I students.	\$4,190.40
2011-2012	Dell-laptop computers	Items purchased for use by all students in School #1, not just Title I students.	\$9,034.92
2011-2012	Apple- 20 iPads	Items purchased for use by all students – location unknown	\$4,485.00
2012-2013	Apple-20 iPads	Items purchased for use by all students in School #1, not just Title I students.	\$4,580.00
2012-2013	Study Island-1000 subscriptions	Item purchased for use by all students in the High School, not just Title I students.	\$8,000.00
2012-2013	Time for Kids-magazine subscriptions	Item purchased for use by all students in School #2, not just Title I students.	\$2,420.98
2012-2013	Renaissance Learning-Accelerated Reading	Item purchased for use by all students in School #2, not just Title I students	\$2,996.30
2012-2013	Staff-Literacy Coaches	Expenditure benefits all students, not just Title I students.	\$3,000.00
2012-2013	Staff-Language Arts Supervisors	Expenditure benefits all students, not just Title I students	\$24,000.00
2012-2013	Staff and Busing Co.	Expenditure for college trips, including busing is a district responsibility.	\$5,128.00

Citation: NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds).*

Required Action: The district must reverse the charges for unallowable expenditures of FY 2012-2013 Title I funds, and allocate state/local fund to support these expenditures. The district's use of FY 2011-2012 Title I funds for unallowable expenditures will be referred to the NJDOE's Office of Fiscal Accountability and Compliance for further

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review. The district must submit documentation of the reversal of FY 2012-2013 Title I funds to the NJDOE for review.

Finding 5: The district does not have a comprehensive equipment inventory for items purchased with Title I or IDEA funds.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 32, Equipment.

Required Action: The district must develop a system to track equipment purchased with federal grants. Although the state threshold for reporting equipment is \$2,000 in the Electronic Web Enabled Grant (EWEG) system, the district may have its own lower threshold. The school must track any amount that is less expensive to track than it is to replace. All inventoried items must include tag number, cost, location, date of purchase, grant that funded the purchase and item description. The school must submit a comprehensive inventory of all equipment purchased to the NJDOE for review.

Title IIA

There were no findings for the Title IIA grant.

IDEA (Special Education)

Finding 6: The district miscoded equipment to the incorrect function and object code for instructional services versus support services (100 versus 400 function code).

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

Required Action: The district must improve internal controls and communication between the grants office and the program office when developing a budget and establishing accounts in the accounting system to ensure the proper description of activities for the grant.

Finding 7: The district did not consistently provide parents of students eligible for special education and related services and eligible for speech-language services notice of a meeting for the following:

- Identification meetings;
- Reevaluation planning meetings;
- Eligibility meetings; and
- IEP team meetings (for students eligible for special education and related services only).

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In addition, notices of meetings did not consistently include all purposes of the meeting when the meeting was conducted for more than one purpose. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must provide parents, in writing, notice of a meeting that contains all required components and distribute the notice early enough to ensure they have 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 regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review meeting documentation, including the sign in sheets, for meetings conducted between March 2013 and May 2013.

Finding 8: The district did not consistently inform parents of proposed actions through provision of written notice containing all required components, within 15 calendar days of the date of reevaluation planning meetings conducted for students eligible for speech-language services. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a) and N.J.A.C. 6A:14-2.3(f) and 2.3(g)1-7.

Required Action: The district must ensure parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must provide training for speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to review copies of written notice sent to parents following meetings conducted between March 2013 and May 2013.

Finding 9: The district did not consistently obtain written parental consent or document multiple efforts to obtain written parental consent to conduct reevaluation assessments for students eligible for speech-language services. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); and 34 CFR §300.300(a).

Required Action: The district must ensure informed parental consent is obtained when required and maintained in student files. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists regarding procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of written parental consent, or efforts to obtain consent, to conduct reevaluation

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assessments for students eligible for speech-language services and reevaluated between March 2013 and May 2013.

Finding 10: The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of eligibility for students evaluated for special education and related services and for students evaluated for speech-language services. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

Required Action: The district must ensure parents are provided copies of evaluation reports not less than 10 days prior to the determination of eligibility. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review evidence demonstrating provision of evaluation reports to parents for students evaluated for special education and related services and for students evaluated for speech-language services between March 2013 and May 2013.

Finding 11: The district did not consistently include required considerations and statements in each IEP developed for students eligible for special education and related services and for students eligible for speech-language services.

The IEPs developed for students eligible for special education and related services did not consistently document:

- at least one annual goal with objective(s) for every student;
- statement of how progress towards annual goals will be measured;
- the criteria used to determine accomplishment of the goal;
- whether related services are provided in a group or individual setting;
- the location where the related services will be provided; and
- the amount of time the in-class resource teacher is present in the general education classroom.

In addition, IEPs developed for students eligible for speech-languages services did not consistently document:

- speech-language goal(s);
- statement of how progress towards annual goals will be measured; and
- whether speech-language services are provided in small group or individual setting.

Noncompliance was due to a lack of consistent implementation of district procedures.

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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 all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding district procedures. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, along with IEPs for students whose annual review meetings were conducted between March 2013 and May 2013. 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.statenj.us/education/specialed/forms.

Finding 12: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not include:

- the supplementary aids and services considered;
- an explanation of why they were rejected;
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class;
- the potentially beneficial or harmful effects which a placement in the general education setting 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.

Noncompliance was due to a lack of consistent implementation of district procedures.

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

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 that all required decisions regarding the 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 district 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 regarding the district's procedures. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct

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an on-site visit to interview staff and review the revised IEPs, along with IEPs for students whose annual review meetings were conducted between March 2013 and May 2013. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 13: 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 Intervention and Referral Service (I&RS). Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.3(c).

Required Action: The district must ensure interventions are provided in the general education setting for students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. In addition, the district must ensure when the I&RS team identifies interventions to meet the needs of a struggling learner, the team identifies and maintains documentation of the nature, description, frequency, and duration of the interventions and measuring the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training to administrators and I&RS staff regarding the procedures for implementing the requirements in the citations listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview I&RS team members and teachers and review documentation for students who were provided interventions in general education as per I&RS between March 2013 and May 2013.

Finding 14: The district did not consistently conduct vision/hearing screenings and forward results and a health/medical summary to the child study team for every student referred to the Child Study Team. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.4(j).

Required Action: The district must ensure vision and audiometric screenings are conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation verifying receipt of the health summary, including the vision and hearing screening, for students referred to the child study team between March 2013 and May 2013.

Finding 15: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement

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from the classroom teacher. Noncompliance was due to a lack of consistent implementation of district procedures.

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 regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between March 2013 and May 2013.

Finding 16: 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. Specifically, functional assessments did not consistently include a structured observation in other than a testing session. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).

Required Action: The district must ensure all components of the functional assessment are conducted as part of the initial evaluations process. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the district's procedures for implementing the requirements in the citation listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to interview staff and review evaluation reports developed between March 2013 and May 2013 for students referred for special education and related services. For assistance with correction of noncompliance, the district is referred to the sample report form for speech-language evaluations which is located at: www.state.nj.us/education/speced/forms.

Finding 17: The district did not consistently determine continued eligibility within three years of the previous eligibility date for students eligible for special education and related services. Noncompliance was due to a lack of consistent implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.8 (e); and 20 U.S.C. §1414(a)(2)(B)(ii) and (d); and 34 CFR §300.324(b)1.

Required Action: The district must ensure reevaluations are conducted within required timelines. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will

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conduct an on-site visit to interview staff and review evidence of determination of continued eligibility for students identified during monitoring along with the signature page from eligibility meetings held as part of the reevaluation process between March 2013 and May 2013. Names of the students whose triennial reevaluation timelines were not met will be provided to the district by monitor.

Carl D. Perkins

Finding 18: The district is not offering a coherent sequence of courses for many of their CTE programs that are being supported with Perkins funds. It appears that the district is offering a variety of electives without regard to sequencing for program completion.

Citation: N.J.A.C. 6A: 19-3.1.6 (i) Program Requirements.

Required Action: In the future, the district must ensure that a coherent sequence of courses is offered for approved CTE programs supported with Perkins funding. The course sequence should consist of those courses identified in the approved program reapproval application. Programs and course sequence information should be available for students, teachers, guidance counselors, administrators and parents.

Finding 19: Three of the district's CTE programs supported with Perkins funds are past due for reapproval. The Mechanical Drawing Program was due for reapproval in FY 2010-2011. The Fine Studio Arts and Prepress Desktop Publishing programs were both due for reapproval in FY 2011-2012.

Citation: N.J.A.C. 6A: 19-3.2 Program Approval.

Required Action: In the future, the district must ensure the program reapproval applications are submitted in a timely manner in accordance with the CTE Five Year reapproval schedule. Programs not reapproved will be deleted from the OCTE approved program list and will no longer be eligible for Perkins funding.

Finding 20: The district has not established advisory boards for any of their approved CTE programs.

Citation: Perkins: P.L. 109-270§134 (b) (5) & N.J.A.C. 6A:19-3.1 Program Requirements.

Required Action: The district must establish an advisory board for each approved CTE program. The advisory board must have membership representation as indicated in the New Jersey Administrative Code cited above and the program approval applications. Each advisory board must meet at least twice per project period. Once the advisory board has been established, the district must submit a copy of the advisory board minutes to their NJDOE Perkins program officer. Programs without evidence of a functioning

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advisory board will not be considered approved programs and will not be eligible for FY 2014 Perkins funding.

Finding 21: The following equipment purchased with FY 2011-2012 Perkins funds was not properly numbered with inventory tags and was made available to the general school population without priority procedures for CTE program utilization.

- An iPad cart containing 20 iPads was approved for use in the 2D Art Lab (Fine Arts Program) However, the equipment was being used in the Music Technology Classroom, and inventory tags were not present.
- An iPad cart with 20 iPads was located in the HS Media Center as identified. However, the equipment was available for general school use, not restricted for primary CTE use and did not contain inventory tags.

Citation: Perkins: P.L. 109-270 § 135 (b) 7, Perkins One Year Grant Application Guidelines July 1, 2011-June 30, 2012 Section A: 4.4 Supplement Not Supplant and Section D:1.5.7 Equipment.

Required Action: The district must place visible numbered identification tags on equipment and must ensure that equipment purchased with Perkins funds is utilized primarily in the CTE programs for which it was approved.

Finding 22: A Smart Board and projector purchased with Perkins funds could not be located or verified by district personnel.

Citation: Perkins: P.L. 109-270 § 135 (b) 7, Perkins One Year Grant Application Guidelines July 1, 2011-June 30, 2012 Section A: 4.4 Supplement Not Supplant and Section D:1.5.7 Equipment.

Required Action: The cost of the Smart Board and projector which could not be located are disallowed. The district must reverse charge this expense and charge the purchase to another funding source. The district must also amend the FY 2011 Perkins Final Report to reflect this cost as unexpended and return these funds to the NJDOE.

Finding 23: The district does not have CTSOs for any of their approved programs. Perkins funds were approved to support CTSO advisors for the Future Business Leaders of America (FBLA) and Journalism CTSO. However, the district did not establish a fully functioning FBLA chapter, does not have an approved Journalism CTE program, and a Journalism Club is not a recognized CTSO, as a result, Perkins funds cannot be used to support these programs.

Citation: N.J.A.C 6A:19-3.1.6 Program Requirements; N.J.A.C. 6A19-3.3 Career and Technical Student Organizations.

Required Action: The district must establish official CTSO chapters with the state CTSO organizations for all approved programs. The district should contact their Perkins

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program officer for assistance in identifying the appropriate CTSO for its approved programs.

Finding 24: The Perkins grant for the 2012-2013 school year had been approved in July 2012, yet as of December 18, 2012 approved items have not been ordered or received for student use.

Citation: Perkins: P.L. 109-270 § 135 (b) 7, Perkins One Year Grant Application Guidelines, Section C: Timelines.

Required Action: The district's Perkins Project Director should facilitate/expedite the ordering of supplies and other approved items to fulfill the one-year grant activities to support CTE students/programs during the 2012-2013 school year.

Race to the Top

There were no findings for the Race to the Top grant.

Administrative

Finding 25: The district does not have internal control policies and procedures to prevent contracting with disbarred vendors.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

Required Action: The district should update internal control policies to prevent errors from potentially occurring.

Finding 26: The district does not have formal written policies for requesting reimbursement from the EWEG or System for Administering Grants Electronically system. However, the monitoring team did verify the district's practice for requesting reimbursement through inquiries about the district's internal controls.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

Required Action: The district must have a formal board policy concerning the reimbursement of grant funds. The district must submit a copy of its written policy to the NJDOE for review.

Finding 27: The district has no evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law (PSCL) [N.J.S.A. 18A:18A:10(a)], a board of education may place its order with a vendor offering the lowest price, including delivery charges, that best meets the requirements of the board of education.

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However, for all federal funds, districts need to review 34 CFR Part 80.36 on procurement requirements. The federal procurement regulations under this section do not include all the exemptions allowed under the PSCL and therefore, these federal regulations require districts to competitively contract or bid all goods and services under the bid threshold, whether exempt under PSCL or not. The federal rules do include provisions for procurement by “noncompetitive proposals,” but only under certain circumstances.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

Required Action: The district should review 34 CFR Part 80.36 and use open and competitive procedures where at all possible. The district should also analyze and include documentation in its files that demonstrates the district ensured the costs were reasonable.

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 Anthony Hearn via phone at (609) 633-2492 or via email at anthony.hearn@doe.state.nj.us.