



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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHRISTOPHER D. CERF
Commissioner

June 21, 2013

Dr. Dina Elliott, Superintendent
Cumberland County Vocational Board of Education
601 Bridgeton Avenue
Bridgeton, NJ 08302

Dear Dr. Elliott:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Cumberland County Vocational 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 January 28, 2013. 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 Cumberland County Vocational 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:Cumberland County Vocational BOE Cover Letter/consolidated monitoring
Enclosures

Distribution List

Christopher D. Cerf

David Corso

Justin Barra

Marie Barry

Susan Martz

Karen Campbell

Peggy McDonald

Kimberly Murray

Anthony Hearn

Richard Stepura

Stephen M. Eells

**STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NJ 08625-0500**

CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
601 BRIDGETON AVENUE
BRIDGETON, NJ 08302
PHONE: (856) 451-9000



New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JUNE 2013**

District: Cumberland County Vocational School District
County: Cumberland
Dates On-Site: January 28 and 29, 2013
Case #: CM-018-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 126,472
IDEA Basic	98,621
Title IIA	4,879
Carl D. Perkins	66,026
Total Funds	<u>\$ 295,998</u>

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

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 Cumberland County Vocational 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; Title IIA; Carl D. Perkins and IDEA for the period July 1, 2011 through January 28, 2013.

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, Carl D. Perkins and IDEA from July 1, 2011 through January 28, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA AND CARL D. PERKINS FUNDS

Title I Projects

The district is using its FY 2012-2013 Title I funds to implement a targeted assistance program in its schools. Primarily, the district provides tutoring, in-class support and professional development in mathematics to staff during the summer.

IDEA Projects (Special Education)

The FY 2012-2013 IDEA Basic funds are being used for services to support the students with disabilities enrolled full-time in the Students Training in Vocational Education (STRIVE) program. The district is utilizing funds to support a secretary for the child study team, as well as an instructional aide for one of the STRIVE classrooms. Additionally, IDEA funds are used for contracted related services and expenses associated with the extended school year program.

Carl D. Perkins

The district currently has 21 approved Career and Technical Education (CTE) Programs. Eight of the district's programs are designated as programs of study. In FY 2011-12 and FY 2012-13 grant funds have been used to support end of program assessments, industry-standard supplies, Skill USA competitive events and equipment.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district used economic status as one of the criteria for eligibility to participate in the Title I program. In addition, the notification letter to parents of Title I students did not include the criteria necessary for student's to exit the program or information on the interventions the school is using to address the students' academic needs. Districts must use "multiple, educationally objective criteria to identify students for participation in the Title I program, not economic criteria. The identification criteria, as well as the exit criteria must be included on the school's notification letter to parents. This information is necessary for parents to understand their child's academic deficiencies, and the anticipated level of academic achievement for their child.

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 the multiple measures it uses to identify students for eligibility. The letter must also include the reason for identification, as well as clearly defined exit criteria. The district's notification letters must be updated for FY 2012-2013 to include more specificity regarding what services the children will receive. The revised letter must be submitted to the NJDOE for review before the district issues it to parents.

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

Finding 2: The district does not have the required supporting documents to verify the activity of staff charged to the Title I, Title IIA or IDEA grants at schools. The documentation must reflect what the staff is doing, when and where and must match their funded percentage.

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 each staff member whose salary is 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).

Title IIA

There were no findings for the Title IIA grant.

IDEA (Special Education)

Finding 3: The district's notices of meetings for students eligible for special education and related services did not consistently identify all of the purposes of a meeting when multiple purposes were planned, including that transition planning would be discussed. Noncompliance was due to a lack of 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 ensure parents are provided notice of a meeting that contains all required components, early enough to ensure the parent has an opportunity to attend, and that this documentation is maintained in student files. 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 conduct an on-site visit to interview staff and review copies of invitations for meetings conducted between April 2013 and July 2013.

Finding 4: The district did not consistently provide written notice to parents containing all required components. Specifically, written notice of decisions made at the reevaluation planning meeting for students evaluated for special education and related services did not include the options considered and why those options were rejected. In addition, the district did not consistently document the provision of written notice for reevaluation planning and eligibility meetings when parents were not in attendance, including a request for written consent when proposing to conduct assessments as part of a reevaluation. Noncompliance was due to a lack of 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.

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

Required Action: The district must ensure parents are provided written notice of 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 child study team members 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 copies of written notice of proposed actions following eligibility and reevaluation planning meetings conducted between April 2013 and July 2013.

Finding 5: The district did not consistently document provision of 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. Noncompliance was due to a lack of 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 the provision of copies of evaluation reports not less than 10 days prior to the determination of eligibility. To demonstrate implementation of the procedures, 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 conduct an on-site visit to interview staff and review documentation of provision of evaluation reports for evaluations conducted between April 2013 and July 2013.

Finding 6: The district did not consistently convene reevaluation planning meetings with required participants for students eligible for special education and related services. Noncompliance was due to a lack of implementation of district procedures.

Citation: N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure reevaluation planning meetings are conducted with required participants and documentation of attendance is maintained in the student record. 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 conduct an on-site visit to interview staff and review documentation of signatures of participation for reevaluation planning meetings conducted between April 2013 and July 2013.

Finding 7: The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services.

Specifically, IEPs for students eligible for special education and related services did not consistently include:

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

- a specific description of the provision of related services, including location and whether the service would be provided individually or in a small group format; and
- documentation of participation in statewide assessments, including accommodations and/or modifications, when required.

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

Citation: N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); N.J.A.C. 6A:14-4.3(c); 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 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 the specific students whose IEPs were identified as noncompliant. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs and a random sample of additional IEPs for meetings conducted between April 2013 and July 2013. 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 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 consistently include:

- the potentially beneficial or harmful effects which a placement in general education may have on students with disabilities or other students in the class.

In addition, rationales for removal were not individualized. Noncompliance was due to a lack of implementation of district procedures.

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

Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding 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 that rationales are individualized based on the needs of each student. 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 IEPs for the specific students with IEPs that were identified as noncompliant. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs and a random sample of additional IEPs for meetings conducted between April 2013 and July 2013. Names of the students

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Carl D. Perkins

Finding 9: The district did not have recruiting materials directed to enhance student participation in CTE programs deemed nontraditional based on gender.

Citation: P.L. 109-270 Citation § 134 (b) (10).

Required Action: In the future, the district must implement activities such as utilizing recruiting materials to enhance student participation and completion of nontraditional CTE programs.

Administrative

Finding 10: The district does have internal control policies and procedures to prevent contracting with disbarred vendors. 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 36, Procurement.

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

Finding 11: The district does have formal written policies for requesting reimbursement from the Electronic Web Enabled Grant or System for Administering Grants Electronically systems. 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 12: 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. 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

**CUMBERLAND COUNTY VOCATIONAL SCHOOL DISTRICT
CONSOLIDATED MONITORING REPORT
JUNE 2013**

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.