



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

CHRIS CHRISTIE  
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*Lt. Governor*

CHRISTOPHER D. CERF  
*Commissioner*

April 1, 2013

Mr. Patrick Spagnoletti, Superintendent  
Roselle Park Board of Education  
510 Chestnut Street  
Roselle Park, NJ 07204

Dear Mr. Spagnoletti:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Roselle Park 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 November 30, 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 Roselle Park 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/LR/dk:Roselle Park BOE Cover Letter/consolidated monitoring  
Enclosures

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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**District:** Roselle Park School District  
**County:** Union  
**Dates On-Site:** December 10, 11 and 12, 2012  
**Case #:** CM-064-12

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 330,663
IDEA Basic	452,173
IDEA Preschool	15,562
Title IIA	47,915
Title III	48,477
Race To The Top	26,334
Total Funds	<u><u>\$ 921,124</u></u>

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 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 and Race to the Top). 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 Roselle Park 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; Title III; IDEA Basic and Preschool and Race to the Top for the period July 1, 2011 through November 30, 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, Title III, IDEA Basic and Preschool, and Race to the Top from July 1, 2011 through November 30, 2012. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

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

**Title I Projects**

Title I funds were expended to support supplemental language arts and mathematics programs, professional development, and supplies for Title I instruction.

**IDEA Projects (Special Education)**

The majority of the FY 2011- 2012 IDEA Basic funds were used to fund salaries for special education staff. In addition, a portion of IDEA funds supported contracted services through the Union County Educational Services Commission (UCESC).

**Race To The Top**

The district plans on using the Race to the Top grant for professional services, and supplies. No funds had been expended at the time of the monitoring.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** The district does not have supporting documents to verify the activity of Title I teachers as required by federal law. The documentation must reflect what the staff is doing, when and where and it must match their funded percentage. This documentation is necessary to verify that funded staff are actually performing allowable grant activities.

**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 verify the time and activity of staff charged to the grant. The district must submit a list of FY 2012-2013 Title I funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review.

**Finding 2:**

**Condition:** The FY 2012-2013 Title I eligibility participation letter did not clearly state the multiple measures, including both entrance and exit criteria, used to identify Title I eligible students. Without this information, parents are unable 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.

**Citation:** ESEA §1115: *Targeted Assistance Program*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Required Actions:** In its Title I participation letter, the district must include the multiple measures used to identify the students, as well as clearly defined exit criteria. The district must provide a copy of its revised FY 2012-2013 Title I participation letter to the NJDOE for review.

**Finding 3:**

**Condition:** The district did not provide evidence that multiple measures were consistently applied to determine which students were eligible to receive Title I services. The monitors were unable to verify if the district is actually serving its lowest performing students and that all students receiving services actually met the eligibility criteria.

**Citation:** ESEA §1115: *Targeted Assistance Programs*.

**Required Action:** The district must establish a tracking mechanism for proper Title I student identification. This mechanism must include documentation of which criteria were applied and how the student either met or did not meet the criteria.

**Finding 4:**

**Condition:** The district does not have a parental involvement program that reflects the requirements of Title I. In FY 2012-2013, there is no evidence the district's parental involvement policy and the school's school-parent compact were developed in conjunction with Title I parents. The exclusion of parents in the development of these documents does not offer them the opportunity for full participation in their child's educational program.

**Citation:** ESEA §1118: *Parental Involvement*.

**Required Action:** The district must include the associated stakeholder groups in the development of the parental involvement policy and school-parent compact. The district must provide evidence of development with parents of the Title I students for the 2012-2013 school year to the NJDOE for review.

**Finding 5:**

**Condition:** The district contracts with the UCESC to provide nonpublic services for a lump sum of \$7,138 instead of a per-pupil amount and an hourly rate not to exceed amount. Payment in a lump sum amount, rather than a unit amount, does not provide the necessary detail to ensure the district is submitting payment for services only to its resident nonpublic students and what the services entail.

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

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Required Action:** The FY 2012-2013 contract with UCESC must be revised to itemize the lump sum of \$7,138 on a per-pupil amount and/or hourly rate not to exceed amount. The district must provide supporting documentation for payments rendered in the 2012-2013 school year. The documentation must detail the services performed with the costs for each of these services. This information must be sent to the NJDOE for review.

**Title IIA**

A review of the expenditures charged to Title IIA grant yielded no findings.

**IDEA (Special Education)**

A review of the expenditures charged to Title IIA grant yielded no findings.

**Special Education Programs**

**Finding 6:**

**Condition:** The district did not consistently convene meetings with required participants in attendance. Child study team members did not attend identification meetings, as required and general education teachers did not attend IEP meetings for students placed in separate settings. 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 identification and IEP meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team 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. In addition, a monitor from the NJDOE will conduct an on-site visit to interview staff and review the participant page from IEPs developed between February 2013 and April 2013.

**Finding 7:**

**Condition:** The district did not conduct a meeting within 20 calendar days of receipt of a written request for evaluation for special education and related services or for speech-language services to determine if an evaluation was warranted. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Required Action:** The district must ensure a meeting is conducted within 20 calendar days of receipt of a written request for evaluation to determine if an evaluation is warranted. 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 the dated initial request for evaluation for students referred for special education and related services and for students referred for speech-language services and the participant signatures from the resulting meetings conducted between February 2013 and April 2013.

**Finding 8:**

**Condition:** The district did not consistently provide parents of students eligible for special education and related services and students eligible for speech-language services notice of a meeting for eligibility and IEP meetings. Additionally, the district's notices of meetings for students referred and/or eligible for speech-language services did not include all required components. 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 in writing that contains all required components early enough to ensure the parent has an opportunity to attend. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists 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 copies of notices of IEP meetings conducted between February 2013 and April 2013.

**Finding 9:**

**Condition:** The district did not include a statement of any individual modifications to be provided in the administration of district wide assessments in IEPs of students eligible for special education and related services and speech-language services. Noncompliance was due to a lack of compliant district procedures.

**Citation:** N.J.A.C. 6A:14-4.10(a)1; 20 U.S.C. §1414(d)(1)(A)(i)(VI)(aa); and 34 CFR §300.320(a)(6)(i).

**Required Action:** The district must ensure that IEP documentation indicates a statement of any individual modifications to be provided to the student in the administration of district wide assessments. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff and review IEPs developed between February 2013 and April 2013 for students eligible for speech-language services.



**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Finding 10:**

**Condition:** The district did not consistently inform parents of proposed actions through provision of written notice containing all required components for students referred and/or eligible for speech-language services. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** 20 U.S.C. §1414(b)(1)(c)(4)(A); 34CFR §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 a 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 interview staff and review copies of written notice for meetings conducted between February 2013 and April 2013.

**Finding 11:**

**Condition:** The district did not consistently document interventions in general education setting(s) to students exhibiting academic or behavioral difficulties prior to referring the student for an evaluation. In addition, when interventions were provided through the Intervention and Referral Service (I&RS) team, the district did not maintain documentation of the effectiveness of the interventions. Noncompliance was due to a lack of compliant district procedures.

**Citation:** N.J.A.C. 6A:14-3.3(b); 20 U.S.C. §1413(f)(2); and 34 CFR §300.226(b).

**Required Action:** 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 measure the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and staff 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 for students who were provided interventions in general education between February 2013 and April 2013.

**Finding 12:**

**Condition:** 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 or speech-language services. Specifically, the district did not include the review of prior interventions and teacher interviews. Noncompliance was due to a lack of implementation of district procedures.

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**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 all initial evaluations. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists regarding the district's procedures for implementing the requirements in the citation listed above. The district is referred to the sample report form for speech-language evaluations which is located at [www.state.nj.us/education/speced/forms](http://www.state.nj.us/education/speced/forms). Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students evaluated between February 2013 and April 2013.

**Finding 13:**

**Condition:** The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher. Noncompliance was due to a lack of 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 and 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. A monitor from the NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports developed between February 2013 and April 2013.

**Finding 14:**

**Condition:** The district did not consistently conduct reevaluations within three years of the previous classification date for students currently eligible for special education and related services. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A: 14-3.7(i) and 14-3.8(a) 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 time lines with required participants in attendance. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff and review signatures from eligibility meetings held as part of the reevaluation process between February 2013 and April 2013.

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Finding 15:**

**Condition:** The district did not consistently provide copies of evaluation report(s) to parents at least 10 days prior to the determination of initial and reevaluation eligibility when assessments were conducted for students referred for special education and related services and for students referred for speech-language 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 parents are provided copies of evaluation report(s) 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. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of provision of evaluation report(s) to parents for students evaluated for special education and related services and speech-language services between February 2013 and April 2013.

**Finding 16:**

**Condition:** The district did not include required considerations and statements in the Present Levels of Academic Achievement and Functional Performance section of the IEP for students eligible for special education and related services and for students eligible for speech-language services. 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); 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 considerations and statements. 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. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: [www.state.nj.us/education/specialed/forms](http://www.state.nj.us/education/specialed/forms). A monitor from the NJDOE will conduct an on-site visit to interview staff and review IEPs developed between February 2013 and April 2013.

**Finding 17:**

**Condition:** The district did not consistently document a statement describing the consideration of Extended School Year (ESY) with a description of the program when ESY will be provided in the IEPs of students eligible for speech-language services. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14-4.10(a).

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

**Required Action:** The district must ensure IEP documentation indicates a statement describing the consideration of ESY with a description of the program when it is determined that ESY will be provided. 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. In addition, a monitor from the NJDOE will conduct an on-site visit to interview staff and review IEPs developed between February 2013 and April 2013.

**Finding 18:**

**Condition:** The district did not provide written notice of graduation within required time lines to parents or adult students eligible for special education and related services. In addition, the district did not consistently provide to students eligible for special education and related services a summary of academic achievement and functional performance, containing all required components prior to graduating and/or exiting. Noncompliance was due to a lack of consistent implementation of the district procedures.

**Citation:** N.J.A.C. 6A:14-4.11(b)2,4; 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

**Required Action:** The district must ensure parents or adult students are provided written notice of graduation containing all required components and a summary of academic achievement and functional performance prior to graduation or exiting. 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. A monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of written notice of graduation and the summary of academic performance and functional achievement for students who will graduate in June 2013.

**Finding 19:**

**Condition:** The district did not consistently document consideration of placement in the least restrictive environment in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings. Specifically, IEPs did not consistently include activities to transition the students placed in separate settings to a less restrictive environment. Noncompliance was due to a lack of implementation of district procedures.

**Citation:** N.J.A.C. 6A:14-4.2 (a)4.

**Required Action:** The district must ensure that when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding 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 for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

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 that 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 an on-site visit to interview staff and review the revised IEPs along with IEPs of student placed in separate settings whose IEP meetings were conducted between February 2013 and April 2013. Names of the students with IEPs who were identified as noncompliant will be provided to the district by the special education monitor.

**RACE TO THE TOP**

A review of the expenditures charged to the Race to the Top grant yielded no findings.

**Administrative**

**Finding 20:**

**Condition:** On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) *Public School Contracts Law*.

**Required Action:** Purchase orders should be issued to all vendors prior to goods or services being provided.

**Finding 21:**

**Condition:** Monitors noted several instances where payments exceeded the purchase order amount without documented authorization. Increasing purchase orders and related payments without proper authorization is an internal control weakness and a violation of the New Jersey Accountability Regulations.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.A.C. 6A:23A-6.10 *Approval of amounts paid in excess of approved purchase orders; board policy*.

**Required Action:** The district must adopt a policy establishing the approval process for any remittance of payment for invoice amounts greater than the approved purchase order. The policy shall require the school business administrator (SBA) to identify, and

**ROSELLE PARK SCHOOL DISTRICT  
CONSOLIDATED MONITORING REPORT  
APRIL 2013**

investigate, if necessary, the reason for any increase to the purchase order. If it is found that such an increase is warranted, the SBA shall either approve a revision to the original purchase order with the reason noted, approve the issuance of a supplemental purchase order for the difference, or cancel the original purchase order and issue a new purchase order.

**Recommendation 1:** Although the district does not have formal written policies for requesting reimbursement from the Electronic Web Enabled Grant system, the district's practices for requesting reimbursement were verified through questions concerning 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.

**Recommended Action:** The district must have a formal board policy concerning the reimbursement of grant funds and should submit this to the NJDOE for review.

**Recommendation 2:** The district does not have a purchasing manual that details procedures for the procurement of goods and services.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions.

**Recommended Action:** The district should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

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 Steven Hoffmann via phone at (973) 621-2750 or via email at [steven.hoffmann@doe.state.nj.us](mailto:steven.hoffmann@doe.state.nj.us).