



State of New Jersey

DEPARTMENT OF EDUCATION
PO Box 500
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November 22, 2005

TO: Chief School Administrators
Charter School Lead Persons

FROM: Lucille E. Davy
Acting Commissioner

SUBJECT: Guidance regarding N.J.A.C. 6A:23B pursuant to P.L. 2005, c.132

This memo provides additional clarification in response to questions raised regarding the travel regulations (N.J.A.C. 6A:23B) recently promulgated pursuant to P.L. 2005, c.132. The intent of the regulations is twofold: first, to require local boards of education and boards of trustees to take greater responsibility for district travel (funded by state, federal, or local dollars) through the development of a board policy consistent with the overarching requirements outlined in the regulations; and second, to provide assurance of the district's compliance with the policy the board developed.

As outlined in the regulations, each board must adopt a travel policy by December 31, 2005 that includes the applicable requirements in State OMB Circular Letter 06-02 (State Circular), which can be accessed on the web at www.state.nj.us/infobank/circular/cir0602b.htm, and Federal OMB Circular A-87 (Federal Circular), which can be accessed on the web at http://www.whitehouse.gov/omb/circulars/a087/a87_2004.pdf. Travel as defined in the State Circular, includes three types of travel events in which employees and board members may participate and for which they may be reimbursed: (1) conventions and conferences; (2) staff training and seminars; and (3) regular district business, which includes all regular district travel, including attendance at meetings, conferences and other gatherings not covered by the other two definitions. As stated in the regulations (N.J.A.C. 6A:23B-1.2(c)(3)), the board's policy must include, at a minimum, the applicable restrictions and requirements from these OMB circulars including, but not limited to:

- Types of travel (conventions/conferences, staff training and seminars, and regular district business, as listed/defined in section III of the State Circular);
- Methods of transportation (air travel and other methods as listed/defined in section VII of the State Circular);
- Mileage allowance (as authorized in section VII of the State Circular);
- Meal allowance (allowable per diem reimbursements as authorized for overnight travel in section IX and for daily trips in section X of the State Circular);
- Overnight travel (per diem reimbursements as authorized for lodging and meals in section IX of the State Circular); and
- Submission of supporting documentation including receipts, checks and vouchers (as required in section XIII of the State Circular).

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Travel using federal funds must also comply with the applicable requirements under the Federal Circular. Note that sections of either circular that conflict with New Jersey school law (N.J.S.A. 18A-1 et seq.) are not applicable to school districts and charter schools (e.g. issuance of travel charge cards).

As stated in the regulations, each board is responsible for maintaining detailed documentation on file that demonstrates compliance with the board's travel policy, including approvals, reports and receipts for all reimbursed expenses, as appropriate. While the department is not expanding the minimum chart of accounts to report by function/program a new object code for travel, beginning with the 2006-07 school year, boards are responsible for maintaining separate accounting for these expenditures to ensure compliance with the total amount of travel allotted for the district. This could include a separate/offline accounting of such expenditures and/or expanding the district's accounting system. In any case, the tracking system must be sufficient to demonstrate compliance with the board's policy and the department's regulations, and must provide auditable information.

Pursuant to N.J.A.C. 6A:23B-1.2(b), each board must include all travel, as defined above, in its policy and in its maximum amount allotted and tracked each year. However, a board may establish in its policy, for regular district business travel only, a threshold amount below which board approval is not required (e.g. an annual maximum amount per employee). In addition, boards may approve, at any time prior to the event, travel for multiple months as long as the board approval, as detailed in board minutes, itemizes the approval by event, cost, and number of employees and/or board members attending.

I hope this addresses any outstanding questions. If you have any additional questions, please do not hesitate to contact your county superintendent.

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c: Members, State Board of Education
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