



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Acting Commissioner

May 1, 2014

Mr. Raymond Brosel, Superintendent  
Voorhees Township Public Schools  
329 Route 73  
Voorhees, NJ 08043

Dear Mr. Brosel:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Voorhees 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, 2013 through March 30, 2014. 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 Voorhees 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 Joseph Kirchon at (856) 486-2160.

Sincerely,

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

RJC/JK/dk:Voorhees Twp. Cover Letter/consolidated monitoring  
Enclosures

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**VOORHEES TOWNSHIP BOARD OF EDUCATION**  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
MAY 2014**

**District:** Voorhees Public Schools  
**County:** Camden  
**Dates On-Site:** March 31 and April 1, 2014  
**Case #:** CM-019-13

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 226,080
IDEA Basic	711,304
IDEA Preschool	34,728
Title IIA	66,554
Title III	19,578
Title III Immigrant	22,711
Race to the Top	21,680
Total Funds	<hr/> <hr/> \$ 1,102,635

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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, 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 Voorhees Public Schools 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 II); Title III; Title III Immigrant; IDEA Basic and Preschool; and Race to the Top for the period July 1, 2013 through March 30, 2014.

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, 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, Title III Immigrant, IDEA Basic and Preschool, and Race to the Top from July 1, 2013 through March 30, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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

**Title I Projects**

The district is using its FY 2013-2014 Title I funds to implement a targeted assistance program in Osage Elementary School. Primarily, the district provides tutoring services through pull-out programs. Prior year funds were spent on similar programs.

**Title II Projects**

The district is using Title II funds for professional development and to support the salary of a teacher for class-size reduction.

**Title III Projects**

The district has approximately 40 English Language Learners (ELL) in an English as a Second Language program. Title III funds are used for the partial salary and benefits of a teacher. Title III Immigrant funds are used for extended day programs and iPads.

**IDEA Projects**

The FY 2014 IDEA Basic Funds are being used to provide services and materials to students at Kellman Academy and Voorhees Pediatrics. Nonpublic Preschool funds are used to provide speech-language services and physical therapy to students at local preschool and IDEA Basic funds are used for instructional aide salaries and to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities.

**Race to the Top**

Race to the Top funds were used for the implementation of new teacher and leader evaluation systems.

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**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:**

**Condition:** The district provides academic interventions through pull-out programs. The removal of students from core courses creates increased gaps in the skills and knowledge of academically at-risk students.

**Citation:** ESEA §1115(c) *Targeted Assistance Programs, Components of a Targeted Assistance Program*; USDE Policy letter October 6, 2008.

**Required Action:** The district should revise its Title I program to provide services to Title I students in language arts and mathematics that do not remove students from their core courses. Primary consideration should be given to providing extended learning time opportunities, such as before and after school and summer programs.

**Finding 2:**

**Condition:** There is no evidence the district's parental involvement policy was reviewed and board adopted since September 2007. The annual review and board adoption of the district/school-level Title I parental involvement policy provides families with the knowledge of the mechanisms the district has available for families to participate in their children's educational program.

**Citation:** ESEA §1118(a)(2): *Parental Involvement (Written Policy)*.

**Required Action:** The district must have both a written district parental involvement policy and school-level parental involvement policies that are evaluated annually. Copies of a recent board approved district parental involvement policy and school-level policy must be submitted to the NJDOE for review.

**Finding 3:**

**Condition:** The FY 2012-2013 school-parent compact outlined the responsibilities of the parents and school only. The compact did not include the roles and responsibilities of the students. The exclusion of the students' roles and responsibilities does not offer all parties an opportunity to understand their role in the shared responsibilities for student academic achievement.

**Citation:** ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

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**Required Action:** The district must include the roles and responsibilities for the school, parent, and student in the school-parent compact. The district must submit the revised FY 2013-2014 school-parent compact to the NJDOE for review.

**Title II**

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

**Title III**

**Finding 4:**

**Condition:** The district had a parental notification letter, but the letter did not outline all of the Title III parent notification requirements. Although the district had a parental notification letter for students identified as English Language Learners, there is no letter for parents that specifically outlines the requirements of Title III. The missing elements that need to be included in the parental notification letter are:

- why the student was identified;
- students' level of English proficiency;
- how such level was assessed;
- how the program will meet the needs of the child in attaining English and meeting state standards;
- program exit requirements;
- expected rate of transition out of the program; and
- how the program will meet the objectives of an individualized education program of a child with a disability.

The omission of these elements in the letter excluded parents from having a complete understanding of the program their children are entering.

**Citation:** ESEA 3302 *Parental Notification*.

**Required Action:** The district's Title III parental notification letter must be revised to include the specific requirements for Title III. A sample of this letter is located at: <http://www.state.nj.us/education/bilingual/title3/accountability/notification/title3par.htm>. The district must send a copy of the revised letter to the NJDOE for review.

**Finding 5:**

**Condition:** Title III Immigrant funds were used to fund an extended day program that enrolled 38 non-immigrant students out of the 52 total students in the program. This is a non allowable use for Title III Immigrant funds since Immigrant funds should benefit immigrant students exclusively. This limits other Title III Immigrant supplemental spending and restricts immigrant student access to needed services.

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**Citation:** ESEA 3115(g) *Supplement, Not Supplant*.

**Required Action:** The district must reverse the charges and use non-Title III/non-Title III Immigrant funds for the extended day program salaries. The district must send documentation of the adjusting journal entry to the NJDOE for review.

**IDEA Special Education**

**Finding 6:**

**Condition:** The district included students names on purchase orders for students educated in tuition placements; therefore, violating student confidentiality.

**Citation:** IDEA Regulations 34 CFR 99; N.J.A.C. 6A:32-7.

**Required Actions:** The district must revise procedures to ensure that confidentiality of student information is maintained and that only persons having educational responsibility for those students have access to this information. Revised procedures must be submitted to the NJDOE for review.

**Race to the Top**

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

**Administrative**

**Finding 7:**

**Condition:** The district does not have formal written 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 must update its procedures to demonstrate implementation of the internal control policies to prevent errors from potentially occurring.

**Finding 8:**

**Condition:** The district does not have formal written policies for requesting reimbursement from the Electronic Web Enabled Grant or System for Administering Grants Electronically systems.



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**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 update its policies and procedures to include a description of the specific process to be followed to request reimbursement of federal funds.

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 Joseph Kirchon via phone at (856) 486-2160 or via email at [joseph.kirchon@doe.state.nj.us](mailto:joseph.kirchon@doe.state.nj.us).