



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

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Governor

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Lt. Governor

CHRISTOPHER D. CERF
Commissioner

October 12, 2012

Dr. Patricia Camp, Superintendent
Delran Township Board of Education
52 Hartford Road
Delran, NJ 08075

Dear Dr. Camp:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Delran Township Board of Education**. The funding sources reviewed include titled programs for the Education Jobs Act of 2010 (Ed Jobs) in particular, and/or Elementary and Secondary Education (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2010 through July 19, 2012. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Ed Jobs monitoring reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Delran 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:Delran Twp. BOE Cover Letter/ Ed Jobs
Enclosures

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DELRAN TOWNSHIP SCHOOL DISTRICT
52 HARTFORD ROAD
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Education Jobs Fund Program
New Jersey K-12 Education

EDUCATION JOBS CONSOLIDATED MONITORING REPORT
OCTOBER 2012

District: Delran Township School District
County: Burlington
Dates On-Site: July 19 and 20, 2012
Case #: Ed Jobs-010-11

FUNDING SOURCES

Program	Funding Award
Ed Jobs	\$ 408,141
Title I	220,814
IDEA Basic	677,182
IDEA Preschool	23,714
Title IIA	56,728
Title III	17,926
Title III Immigrant	10,337
Total Funds	<u>\$ 1,414,842</u>

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BACKGROUND

The *Education Jobs Act of 2010 (Ed Jobs)* 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 Ed Jobs). 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 Delran Township School District to monitor the district's use of *Ed Jobs* 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: Ed Jobs; Title I; Title IIA; Title III and IDEA for the period July 1, 2010 through July 19, 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 Education Jobs Act, Title I, Title IIA, Title III and IDEA from July 1, 2010 through July 19, 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 AND IDEA FUNDS

Title I Projects

The district is using its FY 2011-2012 Title I, Part A funds to implement targeted assistance programs in the district. Primarily, the district provides after school and summer programs for its low-performing students to increase student achievement, as well as NJ ASK Prep and a supplemental remedial period at the middle school level.

IDEA Projects (Special Education)

The FY 2011-2012 IDEA Basic and Preschool funds are being used to reduce district tuition expenditures for students receiving special educational services in approved private schools for students with disabilities. In addition, funds are allocated for extended school year services for students who require education beyond the regular school year. Funds are also allocated for consultative and direct services, including occupational therapy, physical therapy, discrete trial and specialized evaluations. The district has allocated its nonpublic proportionate share for in-class resource services and additional speech-language therapy.

DETAILED FINDINGS AND RECOMMENDATIONS

Ed Jobs Act

Finding 1: The district's Cash Management Report does not match the records of the district.

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 accurately reflect cash drawn down versus cash expended and update any drawdown schedules submitted.

Title I

Finding 2: In the Title I required program notification letter to parents of Title I students, the district did not include the criteria for students to exit the program.

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

Required Action: In its Title I program notification letters to parents, the district must include the multiple measures used to identify the students and the reason for identification, as well as clearly defined exit criteria. The district notification letters must be updated for FY 2012-2013 to include more specificity regarding entrance/exit criteria. The letter must be submitted to the NJDOE for review before the district distributes it to parents.

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Finding 3: For the 2011-2012 school year, there is no evidence the district convened the required annual meeting for parents of students of children participating in the Title I program.

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

Required Action: The district must convene the annual meeting for parents of Title I students at all grade levels to inform them of the Title I program. Correspondence inviting parents to attend the annual meeting and documentation of the annual meeting (minutes and sign in sheets) must be submitted to the NJDOE for review and retained at the district.

Finding 4: The district's written parental involvement policy did not address all the required components such as how the district will do the following: involve parents in jointly developing the district parental involvement policy; provide the coordination, technical assistance, and other support necessary to assist Title I schools in planning and implementing effective parental involvement activities to improve student academic achievement and school performance; build the schools' and parents' capacity for strong parental involvement; coordinate and integrate parental involvement strategies under Title I with parental involvement strategies under other programs; conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served with Title I funds; and involve parents in the activities of schools served under the Title I program.

Citation: ESEA §1118 (a)(2) and (b)(1): *Parental Involvement (Local Educational Agency Policy)*.

Required Action: The district must develop a district written parental involvement policy developed in conjunction with parents, obtain board approval for the policy and distribute it to parents of Title I students. The distribution date must be consistent with the date reflected in the NCLB Consolidated Application on the Electronic Web Enabled Grant (EWEG) system. The Parental Involvement Title I, Part A Non-Regulatory Guidance can be found at: <http://www2.ed.gov/programs/titleiparta/parentinvguid.pdf> and additional information found in the NCLB Reference Manual.

Finding 5: The district did not develop a school-level Title I parental involvement policy in conjunction with parents of Title I students.

Citation: NCLB §1118(b): *School Parental Involvement Policy*, United States Department of Education's Title I, Part A Parent Involvement Non-Regulatory Guidance (Item D-1).

Required Action: The district must provide technical assistance to its schools in the development of school-level parental involvement policies and ensure its schools work with their stakeholder groups to develop a school-level parental involvement policy. For FY 2012-2013, each Title I school must distribute a school-level parental involvement

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policy to parents of students and send a copy of the policy to the NJDOE for review. The distribution date must be consistent with the date reflected in the NCLB Consolidated Application on the EWEG system. The Parental Involvement Title I, Part A Non-Regulatory Guidance can be found at: <http://www2.ed.gov/programs/titleiparta/parentinvguid.pdf> and additional information found in the NCLB Reference Manual.

Finding 6: There is no evidence the district notified all the nonpublic schools that enroll resident students of the right to equitable Title I services. (It is noted the district did have documentation of notification for some of the resident nonpublic schools, but non-resident districts were not contacted.)

Citation: ESEA §1120 *Participation of Children Enrolled In Private School.*

Required Action: For the 2012-2013 school year, the district must notify nonpublic schools, located both within and outside the district's boundaries, that enroll resident students of the opportunity for their eligible students to receive equitable services. In addition, the district must include the nonpublic enrollment numbers on the FY 2011-2012 NCLB Application in Step One of the Title I, Part A eligibility tab. The district must submit a copy of the letters and documentation of mailings, refusal forms and affirmation of consultations to the NJDOE. Information on equitable participation of nonpublic students for Title I can be found on the NJDOE website at: <http://www.state.nj.us/education/title1/leg/policy/equitable.shtml>

Finding 7: The district is not tracking expenditures by attendance areas to ensure that the expenses for Title I schools are consistent with each attendance area's allocation on Eligibility Page, Step 4 of the FY 2011-2012 NCLB Consolidated Application.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems; NCLB §9306(a)(5): *Other General Assurances (Assurances).*

Required Action: The district must track Title I school-level allocations reflected in the FY 2011-2012 NCLB Consolidated Application for Title I funds (Eligibility Page, Step 4). The tracking for FY 2011-2012 must be submitted to the NJDOE for review.

Finding 8: The district's accounting system does not have a mechanism to track mandatory reserves, such as School in Need of Improvement professional development and parental involvement, to ensure accuracy of final reports.

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

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Required Action: The district must track its restricted reserves to ensure and verify spending of restricted amounts. The district must submit a list of account numbers being used for this purpose with a description of the accounts to the NJDOE for review.

Title IIA

There were no findings for the Title IIA grant.

Title III and Title III Immigrant

There were no findings for the Title III or Title III Immigrant grants.

IDEA (Special Education)

There were no findings for the IDEA Basic and Preschool grant.

Administrative

Recommendation 1: The district has internal control policies and procedures to prevent contracting with disbarred vendors, but they are not being implemented.

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

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

Recommendation 2: Under the New Jersey's Public School Contracts Law (PSCL), districts are not required to advertise for bids or competitively contract the provision of goods and services by vendors on the state contract list. In accordance with the 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 exemptions allowed under the PSCL and therefore, it is our understanding these federal regulations require districts to competitively contract or bid all goods and services over 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.

The NJDOE has requested clarification from the federal government regarding vendors on the state contract list and we are still waiting for a definitive response. It is the department's position and recommendation to the federal government that such contracts do not need any additional documentation beyond the statutory requirement under N.J.S.A. 18A:18A:10(c) that prior to placing orders, the board of education shall document with specificity that the goods and services selected best meet the requirements of the board of education. See LFN 2010-3 issued January

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15, 2010 for more information on competitive contracting for districts and professional development services.

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

Recommended 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.