



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHRISTOPHER D. CERF
Acting Commissioner

March 13, 2012

Mr. Timothy Bell, Superintendent
Camden County Technical School District
343 Berlin-Cross Keys Road
Sicklerville, NJ 08081

Dear Mr. Bell:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Camden County Technical School 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 January 30, 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 Camden County Technical School 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:Camden Co. Tech. School BOE Cover Letter/ Ed Jobs
Enclosures

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CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT
343 BERLIN-CROSS KEYS ROAD
SICKLERVILLE, NJ 08081
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Education Jobs Fund Program
New Jersey K-12 Education

**EDUCATION JOBS CONSOLIDATED MONITORING REPORT
MARCH 2012**

District: Camden County Technical School District
County: Camden
Dates On-Site: January 30 and 31, 2012
Case #: Ed Jobs-014-11

FUNDING SOURCES

Program	Funding Award
Ed Jobs	\$ 766,399
Title I	1,261,315
IDEA Basic	702,715
Title IIA	141,664
Carl D. Perkins	434,367
Total Funds	<u>\$ 3,306,460</u>

**CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT
EDUCATION JOBS CONSOLIDATED MONITORING REPORT
MARCH 2012**

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 Camden County Technical 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; Carl D. Perkins; and IDEA for the period July 1, 2010 through January 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, review of student records, classroom visitations and interviews with instructional staff to verify implementation of IEPs, review of student class and related service schedules, interviews of child study team members and a speech-language specialist and an interview of the program administrator regarding the IDEA grant and 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, Carl D. Perkins, and IDEA from July 1, 2010 through January 30, 2012. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

**CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT
EDUCATION JOBS CONSOLIDATED MONITORING REPORT
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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 a school wide program in the district. A key component of the program includes ongoing professional development on instructional strategies and the common core curriculum with special emphasis on development of new teachers. The district also has two consultants (language arts and mathematics) who work directly with the teachers on techniques, coaching and modeling lessons. Mathematics and Language Arts Literacy (LAL) coaches are utilized to continue the skills taught from professional development in the classrooms. Reading and mathematics instruction is incorporated across the curriculum, within students' career courses. The district also offers LAL and mathematics tutoring during the school day and after school to low-performing students.

IDEA Projects (Special Education)

The district is using FY 2011-2012 IDEA Basic funds to finance the salaries of special education teachers and child study team members. Funds are also being used to purchase general supplies.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district's Title I, Part A expenditures were not supported by the Title I Unified Plan. Several Title I expenditures do not match the FY 2011-12 NCLB Consolidated Application, School in Need of Improvement (SINI) Title I Unified Plan, or District in Need of Improvement Plan (DINI), and their corresponding budgets (i.e., computers, calculators, supplies, etc.).

Citation: NCLB §1116(b)(3): *Academic Assessment and Local Educational Agency School Improvement (School Plan)*.

Required Action: The FY 2011-12 NCLB Consolidated Application, SINI and/or DINI plans must be revised, as appropriate, to reflect Title I eligible programs implemented and to justify Title I expenditures. The plan(s) must identify resources that will be allocated and reallocated to support the implementation of the strategies and programs in the Plan(s). The NCLB and/or School Improvement Committee must meet regarding the revisions to the plan(s). The district must upload the updated plan(s) into the FY 2011-2012 NCLB Consolidated Application on the Electronic Web Enabled Grant (EWEG) system and submit a copy of the plan(s) plus appropriate meeting documentation to the NJDOE for review.

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Finding 2: The district is not tracking expenditures by location to ensure that the expenses for Title I schools are consistent with each school'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; ESEA §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 2010-2011 Title I, as well as FY 2011-2012 must be submitted to the NJDOE for review.

Finding 3: The district supplanted state/local funds by charging expenses to the Title I grant for items such as staff funding for English and Mathematics teachers, Advanced Placement Exams, lanyards and new mathematics textbooks, all of which are district obligations that should be supported with state/local funds.

Citation: ESEA Section 1120A(b) *Fiscal Requirements, Federal Funds To Supplement, Not Supplant, Non-federal Funds*.

Required Action: The district must reverse the expenditures for the non-allowable costs and identify state/local funds to support these expenditures. The district must submit documentation of the adjusting entries to the NJDOE for review.

Title IIA

There were no findings in Title IIA.

Carl D. Perkins

There were no findings in Carl D. Perkins.

IDEA (Special Education)

Finding 4: The school did not demonstrate that it met the standards of Maintenance of Effort and must provide the necessary financial information in EWEG to show it met the requirement and that substantiates the figures as shown in the IDEA grant.

Citation: Maintenance of Effort - *Funds provided to an LEA under Part B of the Act must not be used to reduce the level of expenditures for the education of children with disabilities made by the LEA from local funds below the level of those expenditures for the preceding fiscal year. 34 CFR §300.203 (a-b)*.

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Required Action: The school must provide all the information into EWEG and provide all supporting information to the NJDOE for review.

Finding 5: The school provided an excess cost computation, but it was not with the most current information. The computation must be revised to reflect the most up-to-date information.

Citation: Use of Amounts – *Amounts provided to the LEA under Part B of the Act must be used only to pay the excess costs of providing special education and related services to children with disabilities. 34 CFR §300.202(a-b).*

Required Action: The school must provide an Excess Cost Calculation to the county office in accordance with the guidance in 34 CFR §300.818, Appendix A and provide all supporting information to the NJDOE for review.

Finding 6: The district misclassified the purchase of three printers into the instructional general supplies category. The equipment should be classified under non-instructional supplies and material, 200-600.

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 revise the grant application and corresponding accounting records to reclassify expenses according to their function. The district must amend the FY 2012 IDEA grant application to reflect allowable expenditures according to the established procedures.

Administrative

Recommendation 1: The district does not have internal control policies and procedures to prevent contracting with disbarred vendors. The district should update internal control policies to prevent potential errors from occurring.

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

Recommendation 2: The district does not have formal written policies for requesting reimbursement from the EWEG system; however, the district's practice for requesting reimbursement was 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.

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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 3: Under the New Jersey's Public District 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 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.