



State of New Jersey
DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

CHRISTOPHER D. CERF
Commissioner

October 24, 2012

Mr. Francisco Duran, Superintendent
Trenton Board of Education
108 North Clinton Avenue
Trenton, NJ 08609

Dear Mr. Duran:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by **Trenton 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 17, 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," Trenton 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 Patricia Lagarenne at (609) 771-2168.

Sincerely,

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

RJC/PL/dk:Trenton BOE Cover Letter/ Ed Jobs
Enclosures

Distribution List

Christopher D. Cerf
Bari Erlichson
David Corso
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Samuel Stewart
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DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NJ 08625-0500

TRENTON PUBLIC SCHOOLS
108 NORTH CLINTON AVENUE
TRENTON, NJ 08609
PHONE: (609) 656-4900



Education Jobs Fund Program
New Jersey K-12 Education

EDUCATION JOBS CONSOLIDATED MONITORING REPORT
OCTOBER 2012

District: Trenton Public Schools
County: Mercer
Dates On-Site: July 18 and 19, 2012
Case #: Ed Jobs-039-11

FUNDING SOURCES

<u>Program</u>	<u>Funding Award</u>
Ed Jobs	\$ 7,789,683
IDEA Basic	3,572,549
IDEA Preschool	80,671
Carl D. Perkins	212,623
	<hr/>
Total Funds	<u>\$ 11,655,526</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 Trenton Public Schools 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; IDEA; and Carl D. Perkins (Perkins) for the period July 1, 2010 through July 17, 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, 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, IDEA and Carl D. Perkins from July 1, 2010 through July 17, 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 IDEA AND CARL D. PERKINS FUNDS

IDEA Projects

The majority of the FY 2012 IDEA funds were used to reduce district tuition expenditures for students receiving special educational services in other public school districts and approved private schools for students with disabilities. FY 2012 IDEA funds were also used to support professional development for special education teachers regarding classroom management skills and behavioral supports in the classroom. Additionally, the nonpublic proportionate share of the grant was used to provide educational supplies and materials for students with disabilities attending nonpublic schools in the district.

Carl D. Perkins Projects

The district's FY 2011 - 2012 Perkins Grant supports seven programs in the Architecture and Construction, Arts, A.V. and Technology, Business Management/Administration, Hospitality and Tourism, Human Services, Manufacturing and Marketing clusters.

The funds provided industry-standard supplies and resources to align career and technical learning to New Jersey Core Curriculum Content Standards, support career and technical student organizations activities, academic tutoring, professional development and technical equipment for student use.

DETAILED FINDINGS AND RECOMMENDATIONS

Ed Jobs Act

A review of the expenditures charged to the Ed Jobs grant yielded no findings.

Carl D. Perkins

Finding 1: Dell computers and Macbooks were purchased for the Career and Technical Education (CTE) program(s). However, the warranty from Dell and Applecare consists of three year warranty coverage. Warranties beyond the current grant year are non-allowable costs.

Citation: Perkins§135 (a)&(b)1-12B, Perkins One Year Grant Application Guidelines July 1, 2011 - June 30, 2012, page 46.

Required Action: The cost of one year warranty coverage for the Dell computers and Macbooks must be calculated and included while the remaining two years of coverage must be paid with district or other funds. In the upcoming two years, the cost of each of the remaining two years of coverage can be included in the applications for the FY 2013 and FY 2014 grant cycles. An adjustment must be made to the FY 2012 Perkins Final Report to list only the cost of one year warranty coverage as expended.

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Finding 2: According to the Office of Career and Technical Education records, there are currently 11 approved CTE programs identified in the district. Seven of which appear to be active at this time and currently there are only two active and functional Advisory Boards that met at least twice in the FY 2012 grant cycle. Documentation including agendas, meeting dates and sign in sheets for each of these meetings should be kept.

Citation: Perkins§134 (b)5, Perkins One Year Grant Application Guidelines July 1,2011-June 30, 2012, page 55.

Required Action: The approved CTE programs must conduct active Advisory Boards for each approved program/program of study and meet at least two times each year.

IDEA

Finding 3: The district contracted with Dynamic Therapeutic Services for speech therapy, occupational therapy and physical therapy services, as well as speech, occupational and physical therapy evaluations. The contract listed the hourly cost for the therapy services at \$95.00 per hour, but did not disclose an agreed upon cost for the evaluations. A review of the purchase orders revealed that \$525.00 was paid for each evaluation.

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 ensure the contracts with professional service/consultants providers are complete and accurate as to the detail of the activity and cost for services. Payments made for such service must match the contract as negotiated.

Finding 4: Educational supplies and materials were purchased through the nonpublic proportionate share of the IDEA grant and provided to students with disabilities who attend a nonpublic school in the district, even though no service plans existed for those students.

Citation: IDEA Regulations 34 CFR §300.130-300.144.

Required Action: The district will meet with the nonpublic school to acquire the educational supplies and materials purchased for the nonpublic students. The district will also work with the nonpublic school to ensure service plans are developed to reflect the needs of the students with disabilities who attend the nonpublic school. Furthermore, the district will develop a procedure to ensure service plans of students who attend nonpublic schools in the district are updated annually. A monitor from the NJDOE will conduct an on-site visit to verify the completion of the required action.

Finding 5: District staff with assigned educational responsibility did not implement each student's IEP as written for the extended school year (ESY) program. Noncompliance was due to a lack of district procedures to ensure IEPs were provided to teaching staff prior to the commencement of ESY services.

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Citation: N.J.A.C. 6A:14-3.7(a)1-4 and 20 USC 1412(a)(5); 34 CFR §300.119.

Required Action: The district must ensure district staff members with assigned educational responsibilities have access to their students' IEP and all programs and services identified in IEPs are fully implemented. In order to demonstrate correction of noncompliance, the district must provide training for child study team members and all related service providers regarding the district's procedures regarding access to IEPs. Additionally, the district must be able to provide documentation that each teacher and provider, as applicable, has been informed of his/her specific responsibilities related to implementing IEPs. A monitor from the NJDOE will conduct an on-site visit to verify the implementation of the required action.

Finding 6: The district did not consistently document in the IEPs of students eligible for special education and related services the relevant factors considered determining whether a student requires an ESY. Noncompliance was due to a lack of implementation of district procedures.

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

Required Action: The district must ensure consideration of ESY is documented in the IEP. 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. Additionally, the district must conduct annual review meetings to review/revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to review the revised IEPs, along with the IEPs for students whose annual review meetings were conducted between January 2013 and June 2013. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

Finding 7: 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 the following:

- Identification meetings;
- Reevaluation planning meetings;
- Eligibility meetings; and
- IEP meetings.

Additionally, the district's notices of meetings did not consistently inform the parent of all intended purposes of the meeting when a meeting was conducted for more than one purpose. 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 that contains all required components, early enough to ensure the parent has an opportunity to

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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. Additionally, a monitor from the NJDOE will conduct an on-site visit to review copies of notices of identification, reevaluation planning, eligibility and IEP meetings that occurred between October 2012 and February 2013.

Finding 8: The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following eligibility and reevaluation planning meetings for students eligible for special education and related services and eligible for speech and language services. Noncompliance was due to a lack of implementation of district procedures.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §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 written notice of a meeting that contains all required components within 15 calendar days of the meeting and the notices are maintained in the student file. In order to demonstrate correction of noncompliance, the district must provide training for child study team members and 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 review copies of notices of eligibility and reevaluation planning meetings that were conducted between October 2012 and February 2013.

Finding 9: The district did not obtain parental consent or maintain documentation of attempts to obtain parental consent when planning to conduct reevaluation assessments. Noncompliance was due to a lack of implementation of district procedures.

Citation: N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); and 34 CFR §300.300(a).

Required Action: The district must ensure records of informed parental consent to conduct assessments are maintained in students' files. If the parent does not respond to a request for consent to conduct reevaluation assessments, the district must maintain documentation of attempts to obtain consent in students' files. In order to demonstrate correction of noncompliance, the district must ensure implementation of the district's procedures. To demonstrate correction, a monitor from the NJDOE will conduct an on-site visit to review documentation of parental consent, or attempts to obtain consent, to conduct reevaluation assessments for students eligible for special education and related services and speech-language services whose meetings were held between October 2012 and February 2013.

Finding 10: The district did not provide copies of evaluation report(s) to parents at least 10 days prior to the determination of eligibility. Noncompliance was due to a lack of implementation of district procedures.

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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 the provision of copies of evaluation report(s) to parents 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 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 review documentation of the provision of evaluation report(s) to parents for students evaluated for special education and related services and speech-language services between October 2012 and February 2013.

Finding 11: The district did not obtain parental consent to waive reevaluation prior to the expiration of eligibility 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:14-2.3(a)1 and 20 U.S.C. §1414(c); 34 CFR §300.300(c)(1) and(2)

Required Action: The district must ensure written parental consent to waive reevaluation is obtained prior to expiration of eligibility for students currently eligible for special education and related services. The district must also ensure written consent is maintained in students' files. 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. Additionally, a monitor from the NJDOE will conduct an on-site visit to review documentation of parental consent to waive reevaluation that was obtained between October 2012 and June 2013.

Finding 12: The district did not consistently ensure the required participants were in attendance at the following meetings for students eligible for speech-language services and for students eligible for special education and related services:

- Identification meetings;
- Reevaluation planning meetings;
- Eligibility meetings; and
- IEP meetings.

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 meetings are conducted with required participants and that documentation of attendance is maintained in students' files. In order to demonstrate correction of noncompliance, the district must conduct training for

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speech-language specialists and child study team members regarding the procedures. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to review copies of IEP participant's signature page from identification, reevaluation planning, eligibility and IEP meetings for students eligible for speech and language services and students eligible for special education and related services whose IEP team meetings were conducted between October 2012 and February 2013.

Finding 13: The district did not consistently document 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, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- Supplementary aids and services considered;
- An explanation of why the supplementary aids and services were rejected; and
- For those students placed in separate settings, activities to transition the student 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)8(i),(ii) and (iii).

Required Action: The district must ensure 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 for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and 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 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 review the revised IEPs, along with the IEPs for students whose annual review meetings were conducted between January 2013 and June 2013. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor.

Finding 14: The district did not consistently provide to students, beginning at age 14, written invitations to meetings where post-school transition was being discussed. Noncompliance was due to a lack of implementation of the district procedures.

Citation: N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2).

Required Action: The district must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. In order to demonstrate correction of noncompliance, the district must conduct

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training for child study team members regarding the procedures for implementing the requirements in the citations listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between October 2012 and February 2013.

Finding 15: The district did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP. Noncompliance was due to a lack of implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.7(e)11.

Required Action: The district must ensure transition is discussed at each IEP meeting for students age 14 or above, and decisions are documented in the IEP. 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. Additionally, the district must conduct annual review meetings to review/revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to review the revised IEPs along with IEPs for students whose annual review meetings were conducted between October 2012 and February 2013. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

Finding 16: The district did not consistently maintain documentation of the description, frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS). Noncompliance was due to a lack of implementation of 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 I&RS team documentation includes the description, frequency, duration and a description of the effectiveness of the interventions provided in the general education setting. 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. Additionally, a monitor from the NJDOE will conduct an on-site visit to review I&RS documentation for students referred to the child study team who were provided interventions in general education between October 2012 and February 2013.

Finding 17: The district did not consistently conduct meetings within 20 calendar days of receipt of a written request for a speech-language evaluation 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).

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation. In order to demonstrate

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correction of noncompliance, the district must conduct training for speech-language specialists regarding the district's procedures. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to review copies of the dated initial request for evaluation for students referred for speech and language services and the signed participation pages from the resulting meetings conducted between October 2012 and February 2013.

Finding 18: 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. Additionally, a monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for speech and language services whose eligibility meetings were held between October 2012 and February 2013.

Finding 19: The district did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services. Noncompliance was due to a lack of implementation of district procedures.

Citation: N.J.A.C. 6A:14-3.4(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 the initial evaluations process. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members regarding the district's procedures for implementing the requirements in the citations listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to review evaluation reports developed between October 2012 and February 2013 for students referred for special education and related services.

Finding 20: The district did not consistently conduct reevaluations within three years of the previous classification date 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.

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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. 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 citations listed above. A monitor from the NJDOE will conduct an on-site visit to review the signed participation page from eligibility meetings held as part of the reevaluation process between October 2012 and February 2013 for students eligible for special education and related services and students eligible for speech-language services.

Administrative

Recommendation 1: 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 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.

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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 Patricia Lagarenne via phone at (609) 777-2168 or via email at patricia.lagarenne@doe.state.nj.us.