



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

CHRIS CHRISTIE
Governor

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Lt. Governor

CHRISTOPHER D. CERF
Commissioner

December 5, 2012

Mr. Brian Loughlin, Superintendent
Middlesex County Vocational and Technical Schools
112 Rues Lane
East Brunswick, NJ 08816-1070

Dear Mr. Loughlin:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by **Middlesex County Vocational and Technical Schools 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 May 2, 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," Middlesex County Vocational and Technical Schools 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:Middlesex Co. Voc. and Tech. BOE Cover Letter/ Ed Jobs
Enclosures

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Education Jobs Fund Program
New Jersey K-12 Education

**EDUCATION JOBS CONSOLIDATED MONITORING REPORT
DECEMBER 2012**

District: Middlesex County Vocational and Technical Schools
County: Middlesex
Dates On-Site: May, 2, 3 and 4, 2012
Case #: Ed Jobs-044-11

FUNDING SOURCES

Programs	Funding Award
Ed Jobs	\$ 463,306
Title I	374,116
Title IIA	57,190
Carl D. Perkins	477,303
IDEA	<u>552,771</u>
Total Funds	<u>\$ 1,924,686</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, Carl D. Perkins 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 Middlesex County Vocational and Technical 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; Title I; Title IIA; Carl D. Perkins and IDEA for the period July 1, 2010 through May 2, 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 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 Ed Jobs Act, Title I, Title IIA, Carl D. Perkins, and IDEA from July 1, 2010 through May 2, 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, IDEA AND CARL D. PERKINS FUNDS

Title I Projects

The district used its FY 2011-2012 Title I, Part A funds to implement targeted assistance programs. Primarily, the district provides for its low-performing students extended time in Pre-Algebra classes, supplemental classes of READ 180, tutoring, and Mathematics and English for Practical Applications.

IDEA Projects (Special Education)

The majority of funds were used for salaries and benefits of special education teachers. The district also allocated a portion of the funds for instructional supplies.

Carl D. Perkins

The grant supports career and technical education (CTE) programs in three high schools located in Perth Amboy, East Brunswick and Piscataway and two academies located in Woodbridge and Edison. The district has a total of 33 secondary programs of which five are programs of study aligned to articulation agreements at postsecondary institutions such as Middlesex Community College and other colleges in the region. The CTE programs support Career and Technical Student Organizations (CTSO) and align with Standard 9.4 of New Jersey Career and Technical Education Standards.

DETAILED FINDINGS AND RECOMMENDATIONS

Ed Jobs Act

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

Title I

Finding 1: Time and activity sheets for employees charged to the NCLB and the IDEA grants should include additional information which includes acknowledgment that a percentage of the salary is charged to the respective grant and include the location where the employee worked.

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 verify the time and activity of staff charged to the grants. The district must submit a list of FY 2012 IDEA and Title I funded staff, salaries, funding percentages and time sheets that match funding percentage to the NJDOE for review.

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Finding 2: The district failed to issue a purchase order prior to services being rendered (confirming order). The district's policy and state regulations require that a properly executed purchase order be issued prior to services being rendered.

Citation: N.J.S.A 18A:18A(2)(v) *Public School Contracts Law*.

Required Action: The district must implement a process to ensure purchase orders are issued prior to receiving goods and services from vendors.

Finding 3: The district is not tracking expenditures by attendance areas in its accounting system to ensure 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. The district must submit an updated schedule of expenses by location to the NJDOE for review.

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 4: The district has clear and distinguishable identification criteria for its Title I students, but has minimal evidence to confirm the Title I students meet the multiple measures established by the district.

Citation: ESEA §1115(B): *Targeted Assistance Programs (Eligible Children from Eligible Population)*.

Required Action: The district must establish a mechanism to clearly reflect the identification criterion and the supporting data elements for all of its Title I students served in its Title I funded schools.

Finding 5: The district did not develop school-level Title I parental involvement policies for its Title I funded schools.

Citation: ESEA §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: Each Title I school must have a school-level parental involvement policy. The district should provide technical assistance to its schools in the development of school-level parental involvement policies and ensure that its schools work with their stakeholder groups to develop the policies. Each school must distribute a school parental

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involvement policy to parents of the Title I students and send a copy to NJDOE for review.

Finding 6: The district's use of Title I, Part A funds to fund a portion of the guidance counselor's salary and associated benefits supplants state and local funds since these purchases are district obligations.

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

Required Action: The district must reverse these charges and allocate state/local funds, rather than using Title I funds to support these expenditures. The district must provide evidence of the journal entry to reverse the expenditure to NJDOE for review.

Title IIA

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

Carl D. Perkins

A review of the expenses charged to the Carl D. Perkins grant yielded no findings.

IDEA (Special Education)

Finding 7: The district did not consistently provide parents written notice that contains all required components following identification and reevaluation planning meetings for students eligible for special education and related 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 notice of a meeting in writing that contains all required components. In order to demonstrate correction of noncompliance, the district must provide training for child study team members regarding the procedures for implementing the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to review notices following identification and reevaluation planning meetings held between June 2012 and September 2012.

Finding 8: The district did not consistently 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 compliant district procedures.

Citation: N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

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Required Action: The district must ensure parents are provided copies of evaluation report(s) not less than 10 days prior to the determination of eligibility. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citation listed above and conduct training for child study team members on implementation of the procedures. Additionally, a monitor from the NJDOE will conduct an on-site visit to review documentation of provision of evaluation report(s) to parents for students assessed to determine initial eligibility and continued eligibility as part of the reevaluation process between June 2012 and September 2012.

Finding 9: The district did not consistently convene IEP team meetings with required participants for students 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(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The district must ensure IEP team meetings are conducted with required participants and documentation of attendance or written parental consent to excuse a member of the team are maintained in student's records. 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 files for students whose IEP team meetings were conducted between June 2012 and September 2012.

Finding 10: The district did not conduct vision/hearing screenings and health/medical summaries for every student referred to the child study team for evaluation. Noncompliance was due to a lack of compliant district procedures.

Citation: N.J.A.C. 6A:14-3.4(j).

Required Action: The district must ensure a vision and audiometric screening is conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citation listed above and conduct training for child study team members on implementation of the procedures. Additionally, a monitor from the NJDOE will conduct an on-site visit to review copies of vision and audiometric screenings and health/medical summaries provided to case managers for students referred to the child study team between June 2012 and September 2012.

Finding 11: The district did not 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 compliant district procedures.

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Citation: N.J.A.C. 6A:14-3.3(c).

Required Action: The district must ensure I&RS documentation includes the description, frequency, duration and effectiveness of the interventions provided in the general education setting. In order to demonstrate correction of noncompliance, the district must revise their procedures to ensure compliance with the citation listed above and conduct training for the intervention and referral services committee and 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 for students who were provided interventions in general education between June 2012 and September 2012.

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.