



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

ROCHELLE R. HENDRICKS
Acting Commissioner

December 21, 2010

Dr. Patrick Martin, Superintendent
Township of Union Board of Education
2369 Morris Avenue
Union, NJ 07083

Dear Dr. Martin:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Township of Union Board of Education**. The funding sources reviewed include titled programs for the American Recovery and Reinvestment Act (ARRA) in particular, and/or No Child Left Behind Act (NCLB), the Individuals with Disabilities Education Act (IDEA) and State Fiscal Stabilization Funds (Education Stabilization Fund and Government Stabilization Fund). The review covered the period July 1, 2009 through June 30, 2010. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued ARRA monitoring reports will be posted on the department's website at <http://www.nj.gov/education/arra/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Township of Union 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 school 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 Ronald Fisher at (609) 777-3723.

Sincerely,

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

RJC/LDM/Township of Union BOE Cover Letter
Enclosures

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TOWNSHIP OF UNION BOARD OF EDUCATION
2369 MORRIS AVENUE
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American Recovery & Reinvestment Act 2009
New Jersey K-12 Education

**ARRA MONITORING REPORT
DECEMBER 2010**

District: Township of Union Public School District
County: Union
Dates On-Site: February 22 through 25, 2010
Case #: ARRA-079-09

FUNDING SOURCES

Program	Funding Award
State Fiscal Stabilization Fund - Education Stabilization Fund	\$4,329,129
State Fiscal Stabilization Fund - Government Services Fund	170,026
ARRA - Title I	462,591
ARRA - Title I SIA, Part A	-
Total ARRA Funds	<u>\$4,961,746</u>
 Title I	 \$723,896
Title I SIA Part A	28,781
Total Non-ARRA Funds	<u>\$752,677</u>
Total Funding	<u>\$5,714,423</u>

**TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
ARRA MONITORING REPORT
DECEMBER 2010**

BACKGROUND

The *American Recovery and Reinvestment Act of 2009 (ARRA)* and other federal laws require local education agencies (LEAs) to provide programs and services to their schools based on the requirements specified in each of the authorizing statutes (ESEA, IDEA and ARRA). 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 Township of Union Board of Education to monitor the district's use of ARRA 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: State Fiscal Stabilization Funds (SFSF) including the Education Stabilization Fund (ESF) and Government Services Fund (GSF); Title I; Title I SIA, Part A; ARRA-Title I; and ARRA-Title I SIA, Part A for the period July 1, 2009 through February 22, 2010. The monitoring also included a review of the district's most recent ARRA section 1512 and SFSF cash management quarterly reports to determine whether ARRA expenditures, jobs estimates and related information were reported accurately.

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 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 following dollar amounts of expenditures were reviewed for each program monitored for the period of July 1, 2009 through February 22, 2010:

- ESF expenditures totaling \$2,440,071 were reviewed;
- GSF expenditures totaling \$94,459 were reviewed;
- ARRA-Title I expenditures totaling \$228,696 were reviewed;
- Title I expenditures totaling \$384,731 were reviewed; and
- Title I SIA funds had not been expended at the time of our review.

**TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
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GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS

ARRA-Title I and Title I and Title I SIA, Part A

The district operates targeted assistance programs in three of its 10 schools. One of the funded schools has been designated as a School in Need of Improvement (SINI). The district plans to utilize their funds for the following activities at the three targeted assistance schools:

- Academic Achievement Program (AAP) - Students who qualify for the program based on district criteria will receive additional support throughout the school day. Support will include supplemental instruction in mathematics and/or language arts in addition to the standard classroom instruction. The supplemental instruction will be three times a week for each content area.
- Title I multi-station computer lab - equipment to be purchased includes laptop and desktop computers, projectors, smart pads and instructional software to assist with both in-class and pull-out instruction. The computers will also increase student use of Success Maker and Waterford Early Reading applications.
- After School Homework Program - The after school homework program is a supplemental program to reinforce the curriculum and instruction in all content areas.
- Diagnostic Reading Assessments (DRA) - Middle school students who are identified as struggling in language arts are administered the DRA for leveling. Teachers will analyze student data, as well as document the student progress. Students who fall one full grade below their current grade level are provided additional reading instruction through the AAP.

Student progress will be measured through assessments. The students were given a pretest and will have a post test to determine the effectiveness of the program and the academic progress of the students. Additional assessments include: Waterford and Success Maker progress reports, NJ ASK, district benchmarking, and a schoolwide mapping program. The teachers will regularly participate in data analysis to determine the success of the implemented programs and discuss additional interventions and strategies to meet the needs of these students.

The district's expectations for success will be measured through the NJASK and a decrease in Title I students serviced as an increased number of students meet program exit criteria.

**TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
ARRA MONITORING REPORT
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DETAILED FINDINGS AND RECOMMENDATIONS

ARRA-Title I and Title I and Title I SIA, Part A

Finding 1:

Condition: The district's Title I Targeted Assistance program is not clearly identifiable.

Citation: NCLB §1115(c) *Targeted Assistance Programs, Components of a Targeted Assistance Program.*

Required Action: The district must update its Title I program to reflect the operation of a Title I Targeted Assistance program with emphasis placed on providing extended learning opportunities (before/after school programs, summer or transitional program) for its identified Title I students. The program description must include the multiple measures used to identify participating Title I students, how students will be assessed, and the frequency of these assessments. Lastly, the description must provide the criteria used to enter and exit students in the Title I program. The district must submit the updated program description to the NJDOE for review.

Finding 2:

Condition: The district used ARRA-Title I funds to purchase laptop and desktop computers, projectors, smart pads and instructional software for a computer lab in a targeted assistance school. The purchase of equipment with ARRA-Title I funds for a computer lab in a targeted assistance environment is unallowable, as the district cannot ensure that only Title I eligible students will have exclusive use of the facility.

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

Required Action: The district must re-designate the equipment to ensure that only Title I eligible students have use of the equipment. If the district does not re-designate the equipment then it must reverse these expenditures of ARRA-Title I funds, by using state and local funds to absorb the cost.

Finding 3:

Condition: The district used ARRA-Title I funds to conduct an after school homework program which was designed to reinforce the curriculum and instruction in all content areas. Title I funded activities must be geared towards assisting identified low-performing students in achieving proficiency in mathematics and language arts literacy exclusively.

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

TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
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Required Action: The district must revise the program goals and content areas to address remediating and reinforcing instruction for low performing students in the areas of mathematics and language arts literacy only. If the district does not limit the content areas to mathematics and language arts literacy and chooses to address all content areas, then state and local funds will be required in lieu of federal funds to support the program.

Finding 4:

Condition: The district's Title I Parent Notification Letter did not contain all the required elements. The district is required to inform parents of its Title I program selection criteria, why the child met the selection criteria and the course of action that the school has determined to remediate the child.

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

Required Action: The district must include in its parent notification letters the multiple measures used to identify the students, as well as clearly defined exit criteria. The district must provide a copy of its revised Parent Notification Letter to the NJDOE for review.

Finding 5:

Condition: The district did not complete its Title I Unified Plan. The plan submitted did not address how the school/district plans to address the pervasive priority problems that have caused a school to be designated as a SINI.

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

Required Action: The district must ensure that it addresses all of the elements contained in the Title I Unified Plan. The district is also required to attend the Title I Unified training workshops sponsored by the NJDOE.

Finding 6:

Condition: The district did not provide documentation that it distributed its written parental involvement policy to the parents or guardians of identified Title I students.

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

Required Action: The district must submit documented evidence to the NJDOE as to how and when its written parental involvement policy was distributed. Additionally, the distribution date of the parent involvement policy letter must be consistent with the distribution date reflected in its NCLB Consolidated Application on Electronic Web Enabled Grants system (EWEG).

TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
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Finding 7:

Condition: The district did not provide documentation to substantiate the contents of its required Annual Title I parent meeting.

Citation: NCLB §1118(c)(1) (2): *Parental Involvement (Policy Involvement)*.

Required Action: For future Annual Title I Parent meetings, the district must document and maintain the meeting agenda, sign-in sheets and minutes.

Finding 8:

Condition: The district did not provide documentation to substantiate how it effectively involves the parents or guardians of its identified Title I students in assisting with their children meeting academic proficiency.

Citation: NCLB §1118(e)(1) (2): *Parental Involvement (Building Capacity for Involvement)*.

Required Action: The district must ensure that its required parent involvement reserve is spent on parental involvement activities that correlate to the identified priority problems of the district, in an effort to help these parents meet the needs of their low-performing students. The district must provide evidence of convening the required parent involvement activities to the NJDOE for review.

Finding 9:

Condition: The district did not provide documentation of its consultation with non-public school officials.

Citation: NCLB §1120(b): *Participation of Children Enrolled in Private Schools (Consultation)*.

Required Action: For future consultation meetings the district must document and maintain the invitational letters sent to private school officials inviting them to its annual consultation meeting. The district must also maintain meeting notes to ensure that the services provided to the non-public schools meet the statutory requirements.

Financial Management and Reporting

Finding 10:

Condition: The district does not maintain formal written policies and procedures covering periodic review of suspended/disbarred vendors and reimbursement requests for federal funds from the EWEG system.

Citation: EDGAR Part 80.20 - Standards for Financial Management Systems and New Jersey Administrative Code 6A:23A-6.6 - Standard Operating Procedures for Business Functions.

TOWNSHIP OF UNION PUBLIC SCHOOL DISTRICT
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Required Action: The district must develop and maintain complete written policies and procedures which as part of internal controls provides reasonable assurance that the following objectives are being achieved: effectiveness and efficiency of operations, reliability of financial reporting and compliance with applicable laws and regulations.

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 Ronald Fisher at (609) 777-3723 or via email at ronald.fisher@doe.state.nj.us.