



State of New Jersey

DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPEL
Commissioner

December 3, 2015

Mr. Michael Dicken, Superintendent
Gloucester County Vocational-Technical School District
1360 Tanyard Road
Sewell, NJ 08080

Dear Mr. Dicken:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Gloucester County Vocational-Technical Board of Education. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2014 through April 29, 2015. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at www.state.nj.us/education/finance/jobs/monitor/consolidated.

Utilizing the process outlined in the attached "Procedures for LRA/Agency Response, Corrective Action Plan and Appeal Process," the Gloucester County Vocational-Technical 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 Carla Spates at (609) 984-5968.

Sincerely,

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

RJC/CS/dk:Gloucester County Voc.-Tech. BOE Cover Letter /consolidated monitoring
Enclosures

www.nj.gov/education

STATE OF NEW JERSEY
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PO BOX 500
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GLOUCESTER COUNTY VOCATIONAL-TECHNICAL SCHOOL DISTRICT
1360 TANYARD ROAD
SEWELL, NJ 08080
PHONE: (856) 468-1445



New Jersey K-12 Education

CONSOLIDATED MONITORING REPORT
DECEMBER 2015

District: Gloucester County Vocational-Technical School District
County: Gloucester
Dates On-Site: April 28 and 29, 2015
Case #: CM-020-14

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 104,808
Title II, Part A	11,327
IDEA Basic	209,613
Carl D. Perkins	213,491
Total Funds	<u>\$ 539,239</u>

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BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require that districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., ESEA, IDEA, Race to the Top, and Carl D. Perkins). 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 Gloucester County Vocational-Technical School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs were meeting the intended purposes and objectives, as specified in the 2014-2015 grant 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: Title I, Part A (Title I); Title II, Part A (Title II); Carl D. Perkins (Perkins); and IDEA Basic for the period July 1, 2014 through April 29, 2015.

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 school personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants that were reviewed included: Title I, Title II, Carl D. Perkins and IDEA Basic from July 1, 2014 through April 29, 2015. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL OVERVIEW OF USES OF TITLE I, TITLE II, IDEA AND CARL D. PERKINS FUNDS

Title I

The district's FY 2014-2015 application indicated that the district was running a targeted assistance program. Prior year funds were spent on providing tutoring services through extended year programs.

Title II

The district used its FY 2015 Title II funds for professional development. All the professional development was done by EIRC and included understanding by design and the use of McRel's administration evaluation tool training that the district was piloting.

IDEA Projects (Special Education)

The district used FY 2015 IDEA Basic funds to provide professional development opportunities for staff. In addition, funds were used to purchase instructional supplies and equipment for use with special education students.

Carl D. Perkins

The district has 18 Career and Technical Education (CTE) programs, seven which are programs of study. The FY 2015 Perkins funds were used to support technical skills assessments, travel and registration for career and technical student organizations, and professional services for the dance program.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district did not have a viable Title I program, and was unable to articulate how it used the Title I funds to provide services to the district's eligible, identified academically at-risk Title I students.

Citation: BSEA §1115: *Targeted Assistance Programs.*

Required Action: The district's must submit a CAP providing evidence to confirm it was operating a viable, Title I program, as well as to providing services to the district's eligible, identified academically at-risk Title I students. The CAP will be reviewed by the Title I Office and the Office of Fiscal Accountability and Compliance.

Finding 2: The district did not provide evidence that multiple, educationally related objective criteria were applied to determine which students were eligible to receive Title I services. As described, the current Title I eligibility is based on one measure – Lexile scores through

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Achieve 3000 and mathematics levels through state assessments. The monitors were unable to verify if the district was actually serving its lowest-performing students based on multiple measures.

Citation: ESEA §1115: *Targeted Assistance Programs*.

Required Action: The district must establish multiple, educationally related objective criteria and a tracking mechanism for proper Title I student identification. This mechanism must include documentation of which criteria were applied and how the student either met or did not meet the criteria.

Finding 3: The district's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification, the remediation actions the school is using, and the option for parents to opt-out of Title I services. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

Citation: BSEA §1115: *Targeted Assistance Schools*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

Required Action: The district must revise its Title I participation letter to include the multiple, educationally related, objective criteria used to identify students for Title I services, and the criteria used to exit students from the Title I program. The district must provide a copy of its revised FY 2016 Title I participation letter to the NJDOE for review.

Finding 4: The district did not provide evidence of convening an annual Title I parent meeting in the beginning of the year. The district provided a meeting agenda for a parent meeting occurring in December; however, only one parent signed in and, the minutes provided, did not specifically address the legislative requirements of the Title I annual parent meeting. Failing to conduct an annual meeting to explain the Title I legislation and the district's Title I programs in the beginning of the school year does not allow parents of identified Title I students to be informed and vested in the Title I process from the start.

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

Required Actions: The district must convene its FY 2016 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of the year and submit evidence of said meeting to the NJDOE for review (i.e., invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

Finding 5: The district purchased 66 laptop computers, 30 graphing calculators, one LCD projector with software, and a smart response system with a receiver in the 2014-2015 grant year, but was unable to articulate how these purchases were being used to provide services to Title I students that were above and beyond the services received by non-Title I students. If the

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district decides to integrate the use of this technology into its Title I program, it must submit a formal plan to show how they will be used exclusively by the Title I students.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments*. NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The district must submit to the NJDOE a plan that explains how the technology listed above was restricted for the use by Title I students. The plan also must document how the use of this technology was supplemental to other district initiatives.

Finding 6: The district's use of Title I funds to pay for the stipends and benefits of teachers and administrators as literacy coaches, as well as a data analysis consultant supplanted state/local funds.

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

Required Action: The district's must allocate state/local funds rather than using Title I funds to support these expenditures. The district must provide evidence of the adjusting accounting entry for the expenditures to the NJDOE for review.

Finding 7: The district's use of Title I funds for registration costs for a Literacy Consortium supplanted state/local funds. This expenditure was unallowable, as the district was not able to articulate how these services benefited identified Title I students, only.

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

Required Action: The district's must allocate state/local funds rather than using Title I funds to support these expenditures. The district must provide evidence of the adjusting accounting entry for the expenditures to the NJDOE for review.

Title II

A review of the expenditures charged to the Title II grant yielded no findings.

IDEA (Special Education)

Finding 8: The district expended funds for 188 laptop computers totaling \$96,945.96. A review of the locations for these laptops indicates that this is a non-allowable cost since it is supplanting, not supplementing, costs for students with disabilities.

Citation: IDEA Regulation 34 CFR 300.202 and 301. (*Assistance to States for the Education of Children With Disabilities and Preschool Grants for Children With Disabilities*).

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Required Action: The district must develop a procedure to ensure that future purchases with IDEA funds are dedicated solely to the use by students with disabilities, and are intended to supplement special education programs. The district must send documentation of the above to the NJDOE for review.

Finding 9: The district did not document all required considerations and statements in each IEP for students eligible for special education and related services. Specifically, IEPs did not consistently include:

- Liaison for postsecondary transition resources; and
- Goals and objectives for all pull-out subjects.

Citation: N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f), 4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

Required Action: The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with a random sample of additional IEPs developed at meetings conducted between March 2016 and May 2016, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: www.statenj.us/education/specialed/forms.

Finding 10: The district did not consistently complete all required components of the evaluation process for students referred for special education and related services. Specifically, initial evaluations did not include the following:

- Written parental consent to conduct an initial evaluation;
- A minimum of two child study team assessments; and
- All components of a functional assessment (specifically, observation of the student in other than a testing setting).

Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b), 3.3(e) and 3.4, w.4(f)4(1-vi); 20 U.S.C. §1414(b)(1-3); 1412(a)(6)(b); and 34 CFR §300.304(b)(1).

Required Action: The district must ensure that all components of the evaluation process are conducted for students referred for an initial evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an

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on-site visit to interview staff, review initial evaluations conducted between March 2016 and May 2016, and to review the oversight procedures.

Finding 11: The district did not have in place a special education parent advisory group to provide input to the district on issues concerning students with disabilities.

Citation: N.J.A.C. 6A:14-1.2 (h).

Required Action: The district must ensure a special education parent advisory group is available in the district. In order to demonstrate correction of noncompliance, the district must organize and establish a parent advisory group. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the list of members of the special education parent advisory group and any agenda for meetings held subsequent to the monitoring visit.

Finding 12: The district did not consistently convene identification, reevaluation planning, eligibility and annual review meetings with required participants for students eligible for special education and related services.

Citation: N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); 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 student's records. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation, including sign in sheets, for meetings conducted between March 2016 and May 2016, and to review the oversight procedures.

Carl D. Perkins

Finding 13: The district's use of FY 2013-2014 Perkins funds totaling \$24,421.32 to pay for travel expenditures related to the district leadership team (12 persons) attendance at the National Academy Foundation Leadership Conference in New Orleans supplanted state/local funds.

Citation: P. L. 109 §§ 135(a): *Local Uses of Funds (General Authority)* and (b)(1): *Requirements for Uses of Funds*; Carl D. Perkins One-Year Grant Application Guidelines, July 1, 2014 – June 30, 2015 (Perkins Guidelines), Section A, 1.2: *Perkins Grant Overview (Use of Funds by Local Entities)*.

Required Action: The district must remit the unallowable costs to the NJDOE.

Finding 14: The district did not provide evidence that students were given the opportunity to participate in Structured Learning Experiences for all approved programs.

Citation: P. L. 109 §§ 135(b)(3): *Requirements for Uses of Funds Perkins*. N.J.A.C. 6A:19-4: Structured Learning Experiences.

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Required Action: The district must offer CTE students opportunities to explore career interests through participation in structured learning experiences linked to the New Jersey Core Curriculum Content Standards in approved CTE programs.

Finding 15: During the FY 2013-2014 and FY 2014-2015 project periods, the district charged the Perkins grant for multi-year (five year) software access to Career Plus Instructional Units. The district was authorized only to charge the cost from September 1, 2013 and October 1, 2014 through the project period ending on June 30, 2014 and 2015, respectively. Conversely, any cost associated with coverage beyond the applicable grant year is a non-allowable cost and should have been charged to the subsequent project period, as follows:

Grant	PO	Start	End	Charge	Disallowed
2013-2014	266-14	9/1/2013	8/31/2018	\$24,995.00	\$20,795.80
2014-2015	3008-15	10/1/2014	9/30/2019	\$30,529.00	\$25,949.65
Total					\$46,745.45

Citation: 2 CFR §225 (OMB A-87), Attachment A, Section C.3.a.: *Basic Guidelines (Allocable costs)*. 34 CFR § 80.23: Period of availability of funds.

Required Action: The district must remit to the NJDOE \$20,795.80 representing costs that did not benefit the 2013-2014 project period, as well as \$25,949.65, the costs that did not benefit the 2014-2015 project period.

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 Carla Spates via phone at (609) 984-5968 or via email at carla.spates@doe.state.nj.us.