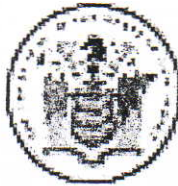


STATE OF NEW JERSEY  
DEPARTMENT OF EDUCATION  
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MONMOUTH COUNTY VOCATIONAL SCHOOL DISTRICT  
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*New Jersey K-12 Education*

CONSOLIDATED MONITORING REPORT  
APRIL 2015

**District:** Monmouth County Vocational School District  
**County:** Monmouth  
**Dates On-Site:** April 2, 3 and 4, 2014  
**Case #:** CM-041-13

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 93,956
Title II, Part A	38,413
IDEA Basic	269,897
Race To The Top	8,166
Carl D. Perkins	493,575
Total Funds	<u>\$ 904,007</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 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, 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 Monmouth County Vocational 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 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: Title I, Part A (Title I); Title II, Part A (Title II); IDEA Basic; Race to the Top; and Carl D. Perkins (Perkins) for the period July 1, 2012 through April 4, 2014.

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 reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as conducted interviews with program administrators and other district personnel as required. Additionally, the IDEA grant review included 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, and interviews of child study team members and speech-language specialists.

**EXPENDITURES REVIEWED**

The grants that were reviewed included Title I, Title II, IDEA Basic, Race to the Top, and Carl D. Perkins for the period July 1, 2012 through April 4, 2014. 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, TITLE II, IDEA, RACE TO THE TOP AND CARL D. PERKINS FUNDS**

**Title I**

The district operates a targeted assistance program at its Title I funded school: Monmouth County Vocational Technical Center. The district identified Mathematics for youth at risk of dropping out as a priority problem.

**Title II**

The district used its Title II allocation to partially fund two teachers for Class Size Reduction.

**IDEA (Special Education)**

Fiscal year 2014 IDEA funds were used for salaries of staff who work with students with disabilities. The remainder of the IDEA funds were used to enhance technology education with equipment and supplies for programs supporting students with disabilities.

**Race to the Top**

The district used Race to the Top funds for online teacher evaluation systems and professional development to accompany this.

**Carl D. Perkins**

The district used Perkins funds to support Career and Technical Educational (CTE) programs throughout the district's six career academies and three specialty schools located in Neptune, Freehold, Wall, Lincroft, Sandy Hook, and Long Branch. The district has a total of 31 NJDOE approved secondary programs, classified under 13 of 16 career clusters. There are six programs of study aligned to articulation agreements with postsecondary institutions. The CTE programs support Career and Student Organizations and align with Standard 9.4 of New Jersey Career and Technical Education Standards.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The district did not fully comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with Title I funds must complete a semi-annual certification attesting to their performance of Title I related duties. Employees with less than 100 percent of their salary paid with Title I funds must complete monthly personal activity reports.

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**Citation:** 2 CFR 225, Appendix B, Section 8(h): *Compensation for personnel services (Support of salaries and wages).*

**Required Action:** The district must ensure employees submit detailed personal activity reports that have been verified by supervisors, as required.

**Finding 2:** The district used income eligibility as a criterion for student participation in its Title I program. Criteria used to identify low-performing students for Title I services must be based upon multiple educationally related and objective criteria.

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

**Required Action:** The district must revise its criteria for identifying participating students in its Title I program. The established criteria must consist of multiple educationally related and objective criteria. The district must provide a copy of its revised selection criteria for Title I services to the NJDOE for review.

**Finding 3:** The district could not provide evidence that its special needs students being supported by a Support Instructor are receiving services above and beyond their IEPs. Title I services must supplement existing educational programs by providing extended learning opportunities to identified low-performing students attending Title I funded schools based upon multiple educationally related criteria.

**Citation:** ESEA §1115(B): *Targeted Assistance Programs (Eligible Children from Eligible Population);* and ESEA §1120A(b)(1): *Federal Funds to Supplement, Not Supplant, Non-Federal Funds.*

**Required Action:** The district must provide a copy of the narrative describing its Title I program for its Title I funded schools to the NJDOE for review.

**Finding 4:** The district could not provide evidence as to when its Title I written parental involvement policy was distributed. Per the legislative requirement, parents/guardians of Title I students have a right to be involved in the development of the written parental involvement policy, as well as be informed of ways they can further engage themselves in the academic performance and achievement of their children.

**Citation:** ESEA §1118(b): *Parental Involvement (School Parental Involvement Policy).*

**Required Action:** The district must ensure that its Title I school distributes its written parent involvement policy to parents/guardians of the Title I students and send a copy to the NJDOE for review.

**Finding 5:** The district could not provide documented evidence of a school-parent compact that met the legislative requirements. Title I schools must provide a mechanism to ensure that

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the parents/guardians of participating students are informed of the roles and responsibility of the school, parents/guardians, and students in achieving academic success.

**Citation:** ESEA §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

**Required Action:** The district must devise and distribute its Title I school-parent compacts to the participating students and parents/guardians in all of its Title I funded schools. The compacts must reflect the legislative requirements by including how each of the following: the school, parent, and students will share in the responsibility for improved student academic achievement. The district must provide a copy of the distributed school-parent compacts to the NJDOE for review.

**Finding 6:** The district could not provide documented evidence that its Title I school convened the annual Title I parent meeting. The parents/guardians of identified Title I students are entitled to be informed about the school's participation in Title I program, legislative requirements, and ways in which they can be involved in helping their child/children succeed academically.

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

**Required Action:** The district's Title I school must convene the annual Title I parent meeting for the parents/guardians of participating Title I students. The district must submit documentation of the meeting (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) 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 7:** According to N.J.A.C. 6A:14-4.7(h), in a full time vocational education program, all responsibility for programs and services for special education students rests with the receiving district board of education. It was determined during monitoring that Monmouth County Vocational Technical School's (MCVTS) full time special education students are case managed by their sending school districts and treated as shared time students. However, MCVTS has developed a plan to assume full responsibility for the full time special education students for the 2014-2015 school year.

**Citation:** N.J.A.C. 6A:14-4.7(h).

**Required Action:** The district must ensure that policies and procedures are implemented to ensure that when a special education student attends their district full time, the district assumes all responsibilities for that student. In order to demonstrate correction of noncompliance, the district must implement newly developed procedures for full time

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special education students for the 2014-2015 school year. The district must also develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and to review the procedures.

**Race to the Top**

A review of the expenditures charged to the Race to the Top grant yielded no findings.

**Carl D. Perkins**

**Finding 8:** The district used its FY 2013-2014 Perkins funds totaling \$34,070.05 to pay for various pieces of exercise equipment used by students during physical education classes at Communications High School.

**Citation:** P. L. 109-270 §311(a): *Fiscal Requirements, Supplement not supplant.*

**Required Action:** The district must develop a process to ensure that Perkins funds will only be used to support approved CTE programs. On March 31, 2014, the district reappropriated Perkins funds earmarked for this expenditure and paid for the exercise equipment with state/local funds.

**Administrative**

There were no administrative findings.

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 Lori Ramella via phone at (609) 984-0937 or via email at [lori.ramella@doe.state.nj.us](mailto:lori.ramella@doe.state.nj.us).

State of New Jersey  
Department of Education  
Office of Fiscal Accountability and Compliance

PROCEDURES FOR LEA/AGENCY RESPONSE  
CORRECTIVE ACTION PLAN AND APPEAL PROCESS

**Board of Education Response:**

Pursuant to N.J.A.C. 6A:23A-5.6, the following actions shall occur:

- (a) Any school district or county vocational school district that has been subject to an audit or investigation by the Department of Education, Office of Fiscal Accountability and Compliance (OFAC) shall discuss the findings of the audit or investigation at a public meeting of the district board of education no later than 30 days after receipt of the findings.
- (b) Within 30 days of the public meeting required in (a) above, the district board of education shall adopt a resolution certifying that the findings were discussed in a public board meeting and approving a corrective action plan to address the issues raised in the findings. The resolution shall be submitted to the OFAC within 10 days of adoption by the board of education.
- (c) The findings of the OFAC audit or investigation and the board of education's corrective action plan shall be posted on the district's web site, if one exists.

If the board of education disputes any of the findings of the audit or investigation, it may file a written appeal with the OFAC of any disputed finding(s) within 10 days of adoption of the resolution. Seeking an appeal of the findings does not preclude adherence to the provisions of (a), (b), and (c) listed above.

**Corrective Action Plan:**

The corrective action plan is to be used when the LEA/Agency is in agreement with any of the findings. To contest a finding, the appeal process must be used. After the appeal is settled, a corrective action plan must be filed for any finding upheld during the appeal process.

The corrective action plan must be prepared by completing the attached form. The LEA/Agency must submit the following information:

- Recommendation number
- Corrective action (approved by the board)
- Method of implementation
- Person responsible for implementation
- Completion date of implementation

If the corrective action plan is acceptable, a letter will be sent to the LEA/Agency indicating that it has been accepted.

If the corrective action plan is not acceptable, a letter will be sent to the LEA/Agency indicating whether further clarification is required or further action is necessary.

**Appeal Process:**

The appeal process is used to contest disputed findings.

Within 10 days of the board's adoption of the resolution approving an appeal of the findings of the audit or investigation, a written request by the LEA/Agency to review the disputed finding(s), recommendation(s), or questioned costs must be submitted to the OFAC Director. The Request for Appeal must indicate the finding(s) in question.

The Request for Appeal must be in writing and the LEA/Agency must present any supporting documentation for the appeal. Subsequent to the submission of the Request for Appeal, the OFAC Director will issue a written decision.

If the final determination made by the Director, is still unsatisfactory to the LEA/Agency, the LEA/Agency may file a Petition of Appeal pursuant to N.J.A.C. 6A:3-1.3.