



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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Acting Commissioner

August 8, 2014

Mr. Robert Glowacky, Chief School Administrator
Warren County Technical School
1500 Route 5 7
Washington, NJ 07882

Dear Mr. Glowacky:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Warren County Technical School 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, 2012 through March 31, 2014. 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 <http://www.state.nj.us/education/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Warren County Technical School 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:Warren County Technical School BOE Cover Letter/consolidated monitoring
Enclosures

Distribution List

David C. Hesse
Robert Bumpus
Susan Martz
Marie Barry
Michael Yapple
Karen Campbell
Peggy McDonald
Kimberly Murray
Steven Hoffmann
Rosalie Lamonte
Stephen M. Eells

**STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NJ 08625-0500**

WARREN COUNTY TECHNICAL SCHOOL
1500 ROUTE 57
WASHINGTON, NJ 07882
PHONE: (908) 689-0122



New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
AUGUST 2014**

District: Warren County Technical School
County: Warren
Dates On-Site: May 6 and 7, 2014
Case #: CM-056-13

FUNDING SOURCES

Program	Funding Award
Title I, Part A	\$ 83,533
IDEA Basic	110,482
Title II, Part A	19,001
Carl D. Perkins	34,739
Total Funds	<u>\$ 247,755</u>

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

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 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 Warren County Technical School 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; and Carl D. Perkins for the period July 1, 2012 through March 31, 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, 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 district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants reviewed included Title I, Title II, IDEA Basic, and Carl D. Perkins from July 1, 2012 through March 31, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

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

Title I Projects

Title I funds were expended to establish a Targeted Assistance Program serving the needs of all students who meet the criteria for being deemed academically at risk in the areas of mathematics, language arts, and biology.

IDEA Projects

The district utilized the FY 2012-2013 and FY 2013-2014 IDEA Basic funds for contracting with Warren County Special Services School District for child study team services, such as a speech therapist, social worker, learning disabilities teacher consultant, and school psychologist. In addition, the district utilized funds for instructional supplies for students and non-instructional supplies for the child study team.

Carl D. Perkins

The district was approved to use the Carl D. Perkins grant funds to operate 21 Career and Technical Education (CTE) programs/programs of study. For school year 2012-2013, the district's Perkins federal allocation was \$26,481, and the reserve allocation was \$16,314.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The Title I participation letter informing the Title I parents/guardians of the Title I program did not clearly state the multiple measures, including both entrance and exit criteria, and interventions. Without this information, parents/guardians are unable to understand the reasons for their child being selected to participate in the Title I program, and what is needed for their child to exit the program.

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

Required Actions: In its Title I participation letter, the district must include the multiple measures including both entrance and exit criteria used to identify the students and interventions. The district must provide a copy of its revised FY 2014-2015 Title I participation letter to the NJDOE for review.

Finding 2: The district did not have a parental involvement program that reflected the requirements of Title I. There was no evidence the district's parental involvement policy was reviewed and board adopted since February 2013 and no evidence that the district's parental involvement policy was developed in conjunction with parents. The annual review and current

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

board adoption allow parents/guardians and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and parents of Title I students.

Citation: ESEA §1118(a)(2): *Parental Involvement (Written Policy)*.

Required Action: The district must have a written district parental involvement policy evaluated annually with current board adoption. Copies of a recent board approved district parental involvement policy must be submitted to the NJDOE for review. Evidence of the annual review must be documented with meeting agenda, sign in sheets and minutes and should be indicated at the bottom of the document. For FY 2014-2015, Title I parents and associated stakeholders must be included in the development process.

Finding 3: For FY 2013-2014, the district did not provide evidence that the school-parent compact was developed in conjunction with Title I parents/guardians. The absence of parent participation in developing these required documents excludes parents/guardians from more active participation in their child's educational program.

Citation: ESEA §1118: *Parental Involvement*.

Required Action: The district must provide evidence to the NJDOE that Title I parents/guardians were included in the development process for FY 2014-2015. Evidence would consist of agenda, sign in sheets and minutes.

Finding 4: For FY 2013-2014, the district provided evidence of convening an annual Title I parent meeting on January 8, 2014, which is late in the project period. Conducting an annual meeting late in the project period does not allow sufficient time for parents/guardians 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 Action: The district must convene its FY 2014-2015 annual Title I meeting for the parents/guardians of its identified Title I students no later than mid-October and submit evidence including the invitational letter/flyer, agenda, meeting minutes, and sign in sheets of said meeting to the NJDOE for review.

Finding 5: The district did not provide evidence that the Parents' Right-to-Know Highly Qualified Teacher (HQT) letter was generated and distributed to parents/guardians in FY 2013-2014. The Parents' Right-to-Know HQT letter informs all parents in the school of their right to ask about the qualifications of their child's teachers.

Citation: ESEA §1111(h)(6): *State Plans: Reports (Parents' Right-to-Know)*.

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

Required Action: The FY 2014-2015 Parents' Right-to-Know HQT letter will need to be generated and sent to the parents of all students who attend Warren County Technical School.

Finding 6: The district's web page needs to be updated to include the current versions of the parent involvement policy and the Parents' Right-to-Know HQT letter.

Citation: ESEA §1111(h)(2)(E): *Public Dissemination.*

Required Action: The district must update the website to reflect current versions of the parental involvement policy and Parents' Right-to-Know HQT letter. In addition, the information needs to be linked to the ESEA-NCLB Targeted Assistance Services tab.

Finding 7: The district used its FY 2013-2014 Title I, Part A funds to pay for DVDs with the generic non-academic topic areas of handling stress, coping with change, and coping with disruptive life changes (\$284.85).

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

Required Action: The district must reverse the charge for this unallowable expenditure and allocate state/local funds, rather than Title I funds. The district must provide documentation of the adjusting journal entry 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: In both the 2012-2013 and 2013-2014 grant years, the district did not enter into properly executed contracts with independent consultants and agencies paid through the IDEA grant.

Citation: EDGAR, PART 80—*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

Required Action: The district must enter into a contract with all agencies or consultants where services are paid through the IDEA grant. Contracts must include a per-service or hourly rate and a not to exceed amount. In addition, all contracts must be approved by board resolution.

Finding 9: The district did not consistently provide to students eligible for special education and related services written notice of graduation and the summary of academic achievement and functional performance prior to graduating or exiting.

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

Citation: N.J.A.C. 6A:14-4.11(b)1.4; and 20 U.S.C. §1414(c)(5)(B); and 34 CFR §300.305(e)(3).

Required Action: The district must ensure written notice of graduation and a summary of academic achievement and functional performance is provided to parents or adult students prior to graduating or exiting. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review copies of notice of graduation and copies of the summary of academic achievement and functional performance provided to students graduating or exiting at the conclusion of the school year, and to review the oversight procedures.

Finding 10: The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2(x), 3.7(e)13; 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 training for child study team members and 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, review copies of invitations to students for IEP meetings where transition was being discussed for meetings conducted between September 2014 and December 2014, and to review the oversight procedures.

Finding 11: The district did not consistently provide notice of a meeting to parents of students referred and/or eligible for special education and related services.

Citation: N.J.A.C. 6A:14-2.3(k)1-5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action: The district must provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have an opportunity to attend. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, and review copies of notice of a meeting for meetings conducted between September 2014 and December 2014, and to review the oversight procedures.

Finding 12: The district did not have a policy for the participation of students with disabilities in district wide assessments.

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

Citation: 34 CFR §300.160.

Required Action: The district must revise policies and procedures to ensure students with disabilities participate in district wide assessments or an appropriate alternative, and are provided with accommodations and modification. The policy must include the provision of alternate assessments for those children who cannot participate in the regular assessment. If the district reports publicly on the district wide assessment, the district must also report with the same frequency and in the same detail as it reports on the assessment of nondisabled children. 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. In addition, a monitor from the NJDOE will conduct an on-site visit to review the policy.

Carl D. Perkins

Finding 13: The district did not have a current articulation agreement approved, signed and dated annually by the lead administrator (superintendent or college president).

Citation: Perkins 135(b)(2)d 134 3(A).

Required Action: All current articulation agreements with postsecondary institutions must be updated, and not be older than 12 months.

Finding 14: The district does not have a Safety and Health Plan for their hazardous CTE programs.

Citation: N.J.A.C. 6A:19-6.5(a).

Required Action: The district must immediately develop a CTE Safety and Health Plan. For guidance on the development of this plan, please contact the CTE Safety and Health Coordinator, Howard Garey howard.garey@doe.state.nj.us.

Finding 15: The district does not have a record retention policy.

Citation: GEPA §437, EDGAR 80.42.

Required Action: The district must immediately develop a record retention policy.

Finding 16: The district does not have policies/procedures that address the procurement, recording, custody, use, maintenance, and disposition of Perkins equipment.

Citation: OMB Circular A-87; EDGAR 80.32.

Required Action: The district must immediately develop a policies and procedures manual related to the above finding.

**WARREN COUNTY TECHNICAL SCHOOL
CONSOLIDATED MONITORING REPORT
AUGUST 2014**

Finding 17: The district expended Perkins funds for instructional salaries, and instructional supplies as part of the FY 2012-2013 Perkins Secondary Consolidated grant for the following programs that were not operating: 46.0401, Building/Property Maintenance; 52.1201, Management Information Systems, General; 12.0500, Cooking and Related Culinary Arts, General; and 15.1301, Drafting and Design Technology/Technician, General.

Citation: Perkins§135 (a) and (b) 1-12.

Required Action: The district must provide a justification as to why Perkins funds were expended for CTE programs that were not operating.

Administrative

Finding 18: On several occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

Citation: EDGAR, PART 80-*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems. N.J.S.A. 18A:18A(2)(v) *Public School Contracts Law*.

Required Action: Purchase orders should be issued to all vendors prior to goods or services being provided.

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 Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@doe.state.nj.us.