



State of New Jersey

DEPARTMENT OF EDUCATION
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Commissioner

September 23, 2016

Dr. David Gentile, Superintendent
Millville Public Schools
110 North Third Street
Millville, NJ 08332

Dear Dr. Gentile:

SUBJECT: Consolidated Monitoring Appeal

The Elementary and Secondary Education Act (ESEA) and other federal laws require state education agencies, such as the New Jersey Department of Education (NJDOE), to 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. In January 2016, the NJDOE issued a Consolidated Monitoring Report to the Millville Public Schools. Subsequently, the district appealed finding numbers 7, 8, 9, 11, 12, 13, 22, and 23.

Finding 7: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district made purchases over the micro purchase limit (small purchase) and did not have secondary quotes as required as noted on PO 1611571-Dell, PO 1611492-NCS Pearson, and PO 1611016-Scholastic Educ., Inside Sales. The district must update its internal controls to ensure that all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Finding 8: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district made purchases under the small purchase rules and did not select the lowest quote. Further, the district did not provide any documentation on why the lowest quote was not acted upon as noted on PO 1611571-Dell, and PO 611492-NCS Pearson. The district must update its internal controls to ensure that all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Finding 9: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. To bypass federal procurement requirements, the district made purchases over the Simplified Acquisition Threshold from Dell computers over a 30-day period through a series of purchase orders. The district must update its internal controls to ensure that all procurement rules are followed. The district must submit updated procedures to the NJDOE for review, including its process for training staff on the new procedures.

Finding 11: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district's expenditure on individual memberships did not follow the guidelines as required under 2 CFR §200.454. A membership for an entity is allowable but individual memberships are not allowable because if an individual leaves the organization, the membership is the property of that individual, not the district. The appeal is denied, however, no further action is required because the project period has ended.

Dr. David Gentile
Page 2
September 25, 2016

Finding 12: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district has disputed Finding 12 identifying the use of Title II funds in the amount of \$6,825.00 to pay for salaries during the summer of FY 2015 based on the documentation provided. The district has stated that the funds were to complete curriculum work. It is a district responsibility to maintain curricula that meets the standards set forth in N.J.A.C 6A:8-3.1. Therefore, use of funds for the purpose of writing curriculum supplants state and district funding. Further, the district has agreed to the acceptable use of professional development activities that meet NCLB criteria as delineated on the Professional Development Tab for Title IIA on the 2015-2016 NCLB application. Therefore, the appeal is denied; however, no further action is required because the project period has ended.

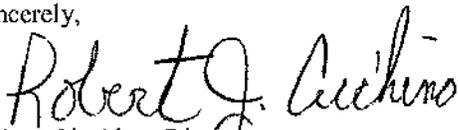
Finding 13: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district has disputed Finding 13 identifying the use of Title II funds in the amount of \$6,250.00 for the district's tutoring program in FY 2015. Use of professional development funds are primarily for teachers and administrators to improve their practices. The district has agreed to the acceptable use of professional development activities that meet NCLB criteria as delineated on the Professional Development Tab for Title IIA on the 2015-2016 NCLB application. Therefore, the appeal is denied; however, no further action is required because the project period has ended.

Finding 22: The NJDOE has reviewed Millville Public School's appeal and final determination is pending submission of documentation. In order to make a determination, the district must submit a Revenue Report from the district general ledger for the FY 2014-2015 and FY 2015-2016 Perkins grants. Please submit no later than October 3, 2016.

Finding 23: The NJDOE has reviewed Millville Public School's appeal and has found no basis to overturn the finding. The district general ledger and approved budget in EWEG for FY 2014-2015 and FY 2015-2016 provided by the district during the consolidated monitoring did not reconcile. The district's procedure to ensure amounts awarded through the Perkins grant are recorded appropriately in district financial records will be reviewed during the CAP follow-up visit.

Accordingly, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approve a corrective action plan which addresses the issues identified on the Consolidated Monitoring Report and submit it to the NJDOE by October 3, 2016. If you have any questions, please contact Carla Spates at (609) 984-5909.

Sincerely,



Robert Cicchino, Director
Office of Fiscal Accountability and Compliance

RJC:CS:Millville Appeal Letter of Response 2016

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