



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

ANGELICA ALLEN-McMILLAN, Ed.D.
Acting Commissioner

May 13, 2021

Mr. Michael Coscia, Board President
Board of Education
Passaic County Technical Institute
45 Reinhardt Road
Wayne, NJ 07470

Dear Mr. Coscia:

SUBJECT: Passaic County Technical Institute – Carl D. Perkins Audit
OFAC Case #SG-0001-20

The New Jersey Department of Education, Office of Fiscal Accountability and Compliance, has completed a fiscal audit of federal funds disbursed by the **Passaic County Technical Institute** (referred to hereinafter as "PCTI" or "district"). The funding sources reviewed include federal and state funding through the Carl D. Perkins secondary and postsecondary grants. The review covered the period July 1, 2019 through June 30, 2020. The results of the audit are detailed in the attached report of examination. Please provide a copy to each board member for his/her review.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," PCTI 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 findings in dispute. 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. Please 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's website. The submission of an appeal does not preclude adherence to the provisions of N.J.A.C. 6A:23A-5.6, et seq.

www.nj.gov/education

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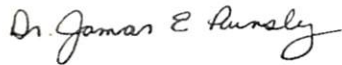
Mr. Michael Coscia

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May 13, 2021

Should you have any questions, please contact Lisa D. McCormick, Manager of the Single Grants/Audit Unit at (609) 206-4347 or via email at Lisa.McCormick@doe.nj.gov.

Sincerely,



Dr. Jamar E. Purnsley, Director
Office of Fiscal Accountability and Compliance

JEP/LDM/hp: Passaic County Technical Institute Cover Letter
Enclosures

c: Daryl Minus-Vincent
Julie Bunt
Martin Egan
Erskin Glover
Lisa D. McCormick
Kathleen Paquette
Kesha Drakeford
Kathryn Holbrook
Stephen M. Eells
John Maiello
Richard Giglio
James Cerullo, CPA

**STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
PO BOX 500
TRENTON, NJ 08625-0500**

**PASSAIC COUNTY TECHNICAL INSTITUTE
45 REINHARDT ROAD
WAYNE, NJ 07470
PHONE: (973) 790-6000**

**REPORT ON EXAMINATION
CARL D. PERKINS AUDIT
FOR THE PROJECT PERIOD:
JULY 1, 2019 TO JUNE 30, 2020**

DISTRICT: Passaic County Technical Institute
COUNTY: Passaic

AUTHORIZED REPRESENTATIVE: John Maiello
PROGRAM DIRECTOR: John Maiello

PERSONS CONTACTED:
Elizabeth Meier, Accountant
Sandra Castro, Executive Secretary to Assistant Superintendent for Curriculum & Instruction

FUNDING SOURCE(S):

GRANT	AWARD
SECONDARY - #PERK 3995-20	\$ 913,070.00
POSTSECONDARY - #POSTSEC 3995-20	81,120.00
TOTAL	\$ 994,190.00

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

BACKGROUND

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) requires grantees to provide career and technical education (CTE) programs and services to secondary and postsecondary students based on the authorizing statutes contained therein¹. In accordance with Section 112(a)(3)(C) and (D) of the Perkins Act², the New Jersey Department of Education (NJDOE) monitors and evaluates subrecipients' implementation/effectiveness of CTE programs and compliance with all applicable Federal laws/departmental guidelines.

As part of this oversight, NJDOE monitored the Passaic County Technical Institute (PCTI) in FY 2012-2013. During the onsite visit, the monitoring team conducted a review of programmatic records and documentation, as well as various purchases orders. As a result, the monitoring team determined that Carl D. Perkins (Perkins) funds were targeted to support over **30** of the district's funded career and technical education (CTE) programs and were used in a manner that fulfilled the requirements of the Perkins legislation. Additional oversight has included annual audits conducted by PCTI's Independent Public Accountant (IPA). In each school year since NJDOE monitored the district, the IPA audit yielded no material internal control deficiencies or questioned costs.

The district currently has **35** department approved CTE secondary programs - more than **15** of which are designated as programs of study (POS). In FY 2019-2020, the Perkins secondary and secondary reserve awards was \$786,564 and \$126,506, respectively. Of the total \$913,070, the department approved PCTI to expend the funding primarily to acquire industry-standard instructional equipment. The district was approved to expend the remainder for various instructional supplies and site licenses as well as for teacher professional development and related travel.

Additionally, PCTI currently has **two** department approved CTE postsecondary programs. The district's FY 2019-2020 Perkins postsecondary award was \$81,120, which the district was approved to expend on software to support student technical skills assessments and instructional supplies.

¹ On July 31, 2018, The Strengthening CTE for the 21st Century Act - more commonly referred to as Perkins V - became law (Pub. L. 115-224) replacing Perkins IV. Some provisions of Perkins V went into effect during the 2019-2020 school year, which served as a transition year for the new law. Full implementation of Perkins V began in the 2020-2021 school year.

² Perkins IV and Perkins V are collectively referred to as the Perkins Act herein.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

EXECUTIVE SUMMARY

The NJDOE, Office of Fiscal Accountability and Compliance conducted a remote audit of PCTI's use of Perkins secondary and postsecondary funds and related program plans, where applicable, to determine whether:

1. the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes; and
2. the funds were spent in accordance with the program requirements, Federal and state laws, and applicable regulations.

The scope of work performed consisted of a review of records including, but not necessarily limited to:

1. accounting records
2. annual audits and inspections
3. articulation agreements
4. board minutes
5. policies and procedures
6. CTE program applications or renewal applications
7. CTE health and safety plans
8. grant applications and related performance reports
9. a sample of purchase orders, along with the related invoices, contracts, quotes, etc.
10. reimbursement requests
11. final expenditure reports

The Auditor-in-Charge also: conducted interviews with district personnel and the program administrator regarding the Perkins grants to the extent applicable; conducted internal control reviews; and completed a virtual inspection of Perkins funded equipment and computers.

The Perkins subgrants reviewed during the examination included the Federally funded secondary and secondary reserve grants, as well as the state funded postsecondary grant from July 1, 2019 through June 30, 2020. The total amount awarded for the period covered by our examination totaled \$994,190; of which, PCTI expended \$981,187 for non-personnel costs consistent with PCTI's approved budget in the department's Electronic Web-Enabled Grant (EWEG) system. The unexpended funds of \$13,003 were released to the department.

Our examination revealed no indication of questioned costs or material internal control deficiencies. The examination did, however, disclose seven non-compliance matters and program specific issues.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

Generally, our testing of selected transactions disclosed the PCTI Perkins secondary and postsecondary expenditures were allowable and allocable in accordance with applicable laws and regulations. However, we detected a number of non-compliance matters and program specific compliance issues as more fully described below.

FINDINGS AND RECOMMENDATIONS

The Findings and Recommendations are disaggregated in the following subsections in continuous numerical order:

1. those resulting in questioned costs;
2. other non-compliance matters; and
3. program specific compliance issues.

QUESTIONED COSTS

A review of the expenditures charged to the Perkins secondary and postsecondary grants yielded no questioned costs.

OTHER NON-COMPLIANCE MATTERS

Finding One: Several district board policies relating to internal controls were not provided for examination or require revision.

During the audit, PCTI's policies and procedures related to its fiscal operations and internal controls were requested for examination.³ The district furnished the documents requested, with the exception of the written procedures listed on the next page.

³ PCTI's administrative personnel began a review of the district's written policies and procurement procedures in consultation with a consultant *prior to* the commencement of our audit. District personnel indicated that they plan to complete this review by June 2021 at which time the revised policies and procedures will be forwarded to the district Board of Education for approval.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

- Determining the allowability of costs in accordance with Subpart E – Cost Principles of this part and the terms and conditions of the Federal award, as set forth by Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UGG), 2 C.F.R. § 200.302(b)(7);
- The mandatory disclosure of all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award pursuant to UGG, 2 C.F.R. § 200.213. Such disclosures must occur in a timely manner and be submitted in writing to the United States Department of Education or NJDOE; and

An examination of the documents provided also revealed that revisions *including, but not limited to*, the following policies:

- The Reimbursement of Federal and Other Grant Expenditures Policy should be modified to replace references to 1) the No Child Left Behind Act with Elementary and Secondary Education Act (ESEA) and 2) the Carl D. Perkins Career and Technical Education Improvement Act of 2006 with The Strengthening CTE for the 21st Century Act.
- Although the district did not have a specific policy addressing contracts for goods or services funded by Federal grants, other district policies covered the topic in part. Such policies, however, failed to mention: 1) applicability – contracts or purchase orders over \$25,000 unless the district chooses a lower threshold; 2) refer to the System for Award Management (SAM) which is utilized for searching debarred/suspended vendors and is accessible at www.sam.gov; and 3) compliance must be demonstrated by written evidence. Examples of evidence include printouts from SAM, imprints from an ink stamp, or Avery labels affixed to purchase orders memorializing performance of this verification.
- The Expenditures for Non-Employee Activities, Meals and Refreshments Policy should be modified to reflect current New Jersey Office of Management and Budget (NJ OMB) circular letter citations.
- The Vocational-Technical Education Policy should be modified to reflect current New Jersey Administrative Code (N.J.A.C.) citations.
- The Title I Fiscal Responsibilities Policy should be modified to incorporate: 1) references to the Elementary and Secondary Education Act of 1965, as amended by ESEA; 2) current legislative citations; and 3) applicable language outlining the process for ensuring compliance with the supplant not supplant provision of ESEA.

PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020

AUDIT RESULTS

Pursuant to UGG, 2 C.F.R. § 200.303, LEAs must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entities are managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. The internal controls should be in compliance with guidance in the “Standards for Internal Control in the Federal Government” (Green Book) issued by the Comptroller General of the United States, and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission.

Moreover, the district’s own policy on Internal Controls stipulates “The school district shall evaluate business processes annually and allocate available resources appropriately in an effort to establish a strong control environment pursuant to the requirements of N.J.A.C. 6A:23A-6.5.”

Recommendation

PCTI must prepare written policies and procedures and revise existing versions as necessary for conformity with state regulations and UGG, 2 C.F.R. § 200 et seq.

Finding Two: The district submitted a reimbursement request for Perkins expenditures that was inconsistent with Federal and departmental requirements.

During the 2019-2020 project period, PCTI submitted a total of 18 Reimbursement Requests. Each time, district personnel certified via NJDOE’s EWEG system that by submitting the Reimbursement Request, the funds requested had either already been expended by the grantee or were to be expended in compliance with the Cash Management Improvement Act (CMIA) and Education Department General Administrative Regulations (EDGAR). PCTI further certified that the funds requested were being expended according to program requirements.

On June 11, 2020, PCTI submitted a Federal Secondary reimbursement request, in part, for a payment to Wenger Corp. The department subsequently processed a check dated June 25, 2020 for automatic disbursement to the district. The expenditure, however, was not liquidated until August 27, 2020 – *two months later*. PCTI should have only claimed expenditures it was able to pay by June 30, 2020 for reimbursement purposes.

The disposition of this payment was contrary to the [NJDOE Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#) which stipulates that a subgrantee may request reimbursement only for (a) expenditures that have already occurred or (b) will occur within three (3) business days of receipt of funds.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

Federal requirements also provide that cash advances be limited to immediate program needs and the time elapsing between the receipt of funds and their expenditure must be minimized. UGG, 2 C.F.R. § 200.305(b) permits cash advances to a grantee only if the grantee has procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the grantee and has financial management systems that meet the standards for fund control and accountability.

Recommendation

PCTI must implement procedures to ensure adequate cash management and compliance with CMIA, departmental requirements, as well as those of UGG, 2 C.F.R. § 200.305.

Finding Three: The district failed to adhere to the provisions of the “Stevens Amendment”.

In FY 2019-2010, PCTI issued purchase order (PO) number 002033 to Wards Science to acquire biomedical instructional supplies. An examination of related bid solicitation documents revealed the omission of certain disclosures required by Federal law aimed at ensuring accountability and transparency in Federal grant spending.

Specifically, the Department of Defense and Labor, Health and Human Services, and Education Appropriations Act, 2019 and Continuing Appropriations Act, 2019, Pub. L. No. 115-245, div. B, title V, Sec. 505, 132 Stat. 2981 (Sept. 28, 2018) - colloquially referred to as the “Stevens Amendment” - requires grant recipients to do the following:

“When issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all grantees receiving Federal funds included in this Act, including but not limited to State and local governments and recipients of Federal research grants, shall clearly state—

- (1) the percentage of the total costs of the program or project which will be financed with Federal money;
- (2) the dollar amount of Federal funds for the project or program; and
- (3) percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.”

Recommendation

PCTI must develop procedures to ensure compliance with the disclosure requirements set forth by the Stevens Amendment.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

Finding Four: PCTI did not review vendors for suspension/debarment.

As noted previously, PCTI issued PO number 002033 to Wards Science to acquire biomedical instructional supplies. An examination of supporting purchasing documents disclosed the vendor certified that it was not included on the any state or Federal list of suspended, debarred or disqualified parties in order to participate in the district's competitive bidding process. However, there was no evidence, nor any indication the district verified that **all** vendors with transactions exceeding the Federal threshold were not prohibited from receiving Federal funds before the district sought the provision of materials and/or services.

According to UGG, 2 C.F.R. § 200.213, non-Federal entities (LEAs) are subject to non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 C.F.R. part 180. These regulations restrict awards, sub awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

Recommendation

Consistent with UGG, 2 C.F.R. § 200.213, PCTI must develop and maintain complete written policies and internal control procedures to ensure verifications are performed to identify any vendors suspended or debarred from participation in Federal programs.

Finding Five: A physical inventory of equipment was not conducted in the previous two years.

The audit disclosed that a physical inventory of equipment had not been performed in the last two years and reconciled to the district's accounting records. According to district personnel, the last physical inventory occurred on June 30, 2013.

UGG, 2 C.F.R. § 200.313(d)(2) requires management to establish property management standards and procedures for equipment acquired with Federal funds and Federally-owned equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place. Such standards, as a minimum, are to meet the following requirements: (1) maintenance of equipment records that include a description of the equipment, a serial number or other identification number, the source of the equipment (including FAIN⁴), who holds title, the acquisition date and cost of the equipment, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the equipment, and any ultimate disposition data

⁴ Federal Award Identification Number (FAIN)

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

including the date of disposal and sale price of the equipment; and (2) requires a physical inventory of all Federally owned equipment be taken and the results reconciled with the accounting records at least once every two years.

Recommendation

PCTI must establish procedures that provide reasonable assurance that all Federally-funded equipment and related records are maintained in compliance with Federal and state regulations including conducting a biennial physical inventory of equipment that is reconciled to its accounting records, as required by UGG, 2 C.F.R. § 200.313(d).

PROGRAM SPECIFIC NON-COMPLIANCE ISSUES

Finding Six: Evidence of current CTE safety and health plans was not presented during the examination.

The district did not provide CTE Safety and Health Plans for its approved CTE programs in hazardous occupations as requested for inspection. In FY 2019-2020, PCTI had a number of department approved CTE programs requiring a CTE Safety and Health Plan, such as:

- Carpentry/Carpenter (460201)
- Cooking & Related Culinary Arts, General (120500)
- Cosmetology/Cosmetologist, General (120401)
- Nursing Assistant/Aide and Patient Care Assistant/Aide (513902)
- Welding Technology or Welder (480508)

N.J.A.C. 6A:19-6.4(a) requires all LEAs operating CTE programs, POS, cooperative education experience, and/or apprenticeship training in a hazardous occupation to organize, adopt, and implement a written Career and Technical Education Safety Health Plan describing the LEA's policies and procedures used to protect students and staff from safety and health risks in the CTE classroom or at a school-sponsored cooperative education experience or apprentice training worksite.

Recommendation

The district must develop policies and procedures to ensure that its CTE safety and health plans are fully implemented, properly maintained and readily available upon the department's request.

**PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020**

AUDIT RESULTS

Finding Seven: PCTI did not ensure compliance with certain other departmental guidelines while administering the grant.

In addition to the preceding finding, it was determined PCTI failed to comply with certain implementing regulations and program specific requirements of the department's Perkins Grant Application Guidelines (Guidelines). For example, the district's POs were not issued with all the required information, such as CIP codes and the intended location of equipment, personal computers and/or other portable devices as required in Section 8.3.3 on page 26 of the Guidelines.

EDGAR, 34 C.F.R. § 76.700 requires a sub-grantee, like PCTI, to comply with the state plan and applicable statutes, regulations, and approved applications, and to use Federal funds in accordance with those statutes, regulations, plans and applications.

Recommendation

PCTI must implement procedures to ensure personnel assigned to administer the Perkins grant comply with the program specific requirements applicable to each project period.

PASSAIC COUNTY TECHNICAL INSTITUTE
CARL D. PERKINS SECONDARY AND POSTSECONDARY GRANTS
FISCAL YEAR 2019-2020

SCHEDULE OF RECOVERY DUE TO SEA

The district's corrective action plan is to be submitted to OFAC personnel as follows:

Mail paper copies to:

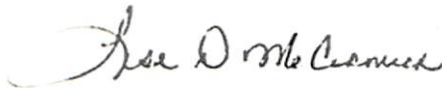
Dr. Jamar E. Purnsley, Director
Office of Fiscal Accountability and Compliance
State of New Jersey
Department of Education
PO Box 500
Trenton, NJ 08625-0500

Email scanned copies to:

Jamar.Purnsley@doe.nj.gov

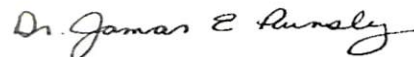
Lisa.McCormick@doe.nj.gov

Submitted by:



Lisa D. McCormick, Manager
Office of Fiscal Accountability and Compliance

Approved by:



Dr. Jamar E. Purnsley, Director
Office of Fiscal Accountability and Compliance

Auditor

Kathryn Holbrook

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

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

LEA/Agency 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 New Jersey Department of Education (NJDOE), 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 the findings were discussed in a public board meeting and approving a corrective action plan (CAP) to address the issues raised in the findings. A copy of the resolution and the approved CAP and/or appeal shall be submitted to the OFAC within 10 days of adoption by the district board of education.
- (c) The findings of the OFAC audit or investigation and the district board of education's CAP shall be posted on the school district's website, if one exists.

These regulations notwithstanding, all grantees are required to develop and submit to a corrective action plan to NJDOE, following receipt a report of examination that indicates noncompliance detected through a monitoring visit or fiscal audit, as provided for in the department's Perkins Grant Application Guidelines.

Corrective Action Plan:

The CAP is to be used when the LEA/Agency agrees with the findings in the report of examination and submitted to OFAC personnel as outlined on the previous page. The CAP must be prepared by completing the attached form and contain 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.

To contest any of the findings, the appeal process must be used.

Appeal Process:

If the board of education disputes any of the findings of the audit or investigation, an appeal may be made by petitioning the Commissioner of Education, pursuant to N.J.A.C. 6A:3-1.1 et seq., Office of Controversies and Disputes. Information on the appeal process can be accessed on the NJDOE internet site by visiting <https://www.state.nj.us/education/cd/faq/index.shtml#q3>. The submission of an appeal of a finding(s) does not preclude adherence to the provisions of (a), (b) and (c) listed above.

John Maiello
Acting Superintendent

Ted Szczawinski
Assistant Superintendent for
Curriculum & Instruction

June 4, 2021

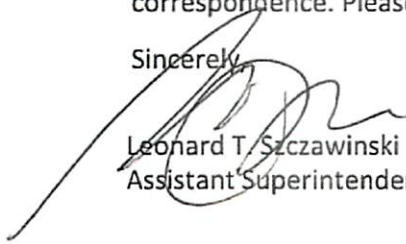
Dr. Jamar E. Purnsley, Director
Office of Fiscal Accountability and Compliance
State of New Jersey
Department of Education
PO Box 500
Trenton, NJ 08625-0500

Dr. Purnsley:

SUBJECT: Passaic County Technical Institute – Carl D. Perkins Audit - OFAC Case #SG-0001-20

As required, pursuant to N.J.A.C. 6A:23A-5.6, the Passaic County Vocational School District has made the following audit and subsequent corrective action plan publicly available for review and the findings in this report discussed at a public board meeting on May 27, 2021. Please find the attached resolution certifying that the findings were discussed in a public meeting, a corrective action plan was approved and is in the process of being posted on the district website. A copy of the resolution and the approved corrective action plan are attached to this correspondence. Please direct any communications to my attention.

Sincerely,


Leonard T. Szczawinski
Assistant Superintendent for Curriculum

C: John Maiello
Rich Giglio
Christine Kahawty
Mae Remer



**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

NAME OF SCHOOL DISTRICT Passaic County Vocational School District

COUNTY Passaic

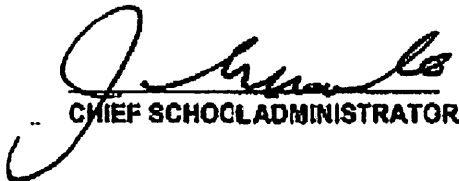
TYPE OF EXAMINATION Carl D. Perkins Audit

DATE OF BOARD MEETING May 27, 2021

CONTACT PERSON Ted Szczawinski

TELEPHONE NUMBER 973-389-4190

RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
One	PCVSD must update Board policies related to internal controls for compliance with Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (UGG), 2 C.F.R. § 200.302(b)(7); and mandatory disclosure pursuant to UGG, 2 C.F.R. § 200.213.	Revise BOE policies and procedures (including purchasing manual) to ensure compliance with Federal and State requirements. Revisions shall include, among other things, addition of policies regarding mandatory disclosure and cost allowability as well as updating citations. Train relevant staff on new/ revised policies, as needed.	Assistant Superintendent for Curriculum and Instruction, Coordinator of Purchasing / Bidding	October 31, 2021


CHIEF SCHOOL ADMINISTRATOR

6/14/21
DATE


BOARD SECRETARY/SCHOOL BUSINESS ADMINISTRATOR

6/14/21
DATE

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

NAME OF SCHOOL DISTRICT Passaic County Vocational Schools

COUNTY Passaic

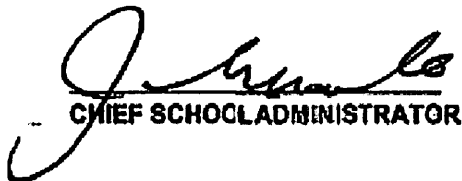
TYPE OF EXAMINATION Carl D. Perkins Audit

DATE OF BOARD MEETING May 27, 2021

CONTACT PERSON Ted Szczawinski

TELEPHONE NUMBER 973-389-4190

RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Two	PCVDS must implement procedures to ensure adequate cash management and compliance with CMA departmental requirements as well as those of OGG, 2 C.F.R.200.305	Implement procedures to ensure only liquidated transactions are included in a request for reimbursement and that all requests are filed by the prescribed deadlines. Train relevant district personnel on revised reimbursement request procedures as well as Federal and NJDOE cash management requirements.	Accountant, Asst. Business Administrator	October 31, 2021


CHIEF SCHOOL ADMINISTRATOR

6/14/21
DATE


BOARD SECRETARY/SCHOOL BUSINESS ADMINISTRATOR

6/14/21
DATE

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

NAME OF SCHOOL DISTRICT Passaic County Vocational School District

COUNTY Passaic

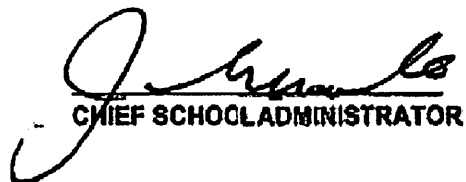
TYPE OF EXAMINATION Carl D. Perkins Audit

DATE OF BOARD MEETING May 27, 2021

CONTACTPERSON Ted Szczawinski

TELEPHONE NUMBER 973-389-4190

RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Three	PCVSD must develop procedures to ensure compliance with the disclosure requirements set forth by the Stevens Amendment.	Implement procedures that ensure that prior to issuing requests for proposal, bid solicitations and other documents related to a funded program are reviewed for compliance with the disclosure requirements of the Stevens Amendment.	Coordinator of Purchasing /Bidding, Business Administrator	October 31, 2021


CHIEF SCHOOL ADMINISTRATOR

6/14/21
DATE


BOARD SECRETARY/SCHOOL BUSINESS ADMINISTRATOR

6/14/21
DATE

**NEW JERSEY DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
CORRECTIVE ACTION PLAN**

NAME OF SCHOOL DISTRICT Passaic County Vocational School District

COUNTY Passaic

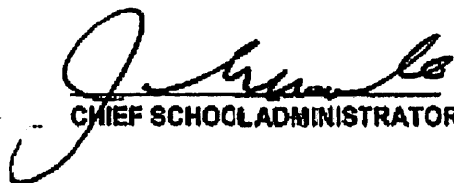
TYPE OF EXAMINATION Carl D. Perkins Audit

DATE OF BOARD MEETING May 27, 2021

CONTACTPERSON Ted Szczawinski

TELEPHONE NUMBER 973-389-4190

RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Four	PCVSD must review vendors for suspension/debarment. According to UGG, 2 C.F.R. § 200.213, non-Federal entities (LEAs) are subject to non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 C.F.R. part 180	Implement procedures to ensure adherence to district's internal controls and policies regarding UGG, 2 C.F.R. § 200.213. Train business office personnel on how to vet vendors for debarment/suspension and how to document vetting.	Coordinator of Purchasing /Bidding, Business Administrator	October 31, 2021


CHIEF SCHOOL ADMINISTRATOR

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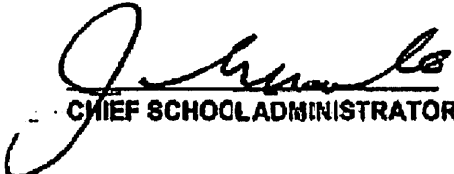
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CONTACTPERSON Ted Szczawinski

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RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Five	A physical inventory of equipment needs to be conducted annually.	A physical inventory of equipment will be performed each year and reconciled to the district's accounting records for Carl D. Perkins and all federally funded purchases.	Assistant Superintendent for Curriculum and Instruction/ Business Administrator	October 31, 2021


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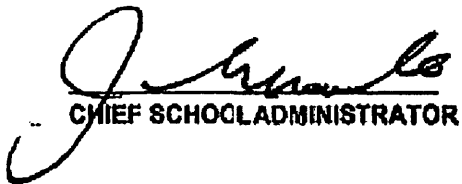
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RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Six	Update and reassign committee members for the oversight of the CTE Safety and Health Plans	All relative CTE programs, POS, Cooperative Education Coordinators, Adult School Director and/or Apprenticeship Training supervisors of hazardous occupations will participate as members of the Career and Technical Education Safety Health Plan committee and the CTE Safety Health Plan policies and procedures will be updated through regularly scheduled meetings.	Assistant Superintendent for Curriculum and Instruction/ Business Administrator	October 31, 2021


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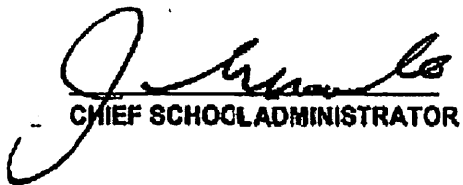
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RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
Seven	Comply with all departmental guidelines while administering the grant.	Ensure compliance with departmental guidelines while administering the grant, CIP codes will be required on purchase orders and the intended location of equipment. Personal computers and/or other portable devices will be included in grant documents and crossed referenced through the physical inventory kept on record.	Assistant Superintendent for Curriculum and Instruction/ Business Administrator	October 31, 2021


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