

CORRECTIVE ACTION PLAN

NAME OF SCHOOL: Office of Home Instruction  
TYPE OF AUDIT: New Jersey Department of Education, Newark Internal Audit Unit (NJDOE-NIAU)  
DATE OF ADVISORY BOARD MEETING: September 25, 2012  
CONTACT PERSON: Office of Home Instruction Supervisor  
TELEPHONE NUMBER: 973 733-6851 or 7308

Abbreviations:

NPS-OSE - Newark Public Schools, Office of Special Education  
NPS-OHI - Newark Public Schools Office of Home Instruction  
NPS\_OOD- Out of District  
ERESC - Essex Regional Education Services Commission  
NJAC- New Jersey Administrative Code

FINDING NUMBER	RECOMMENDATION	METHOD OF IMPLEMENTATION	PERSON(S) RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE
1	The auditor recommends the district provide the NJ Essex County Department of Education Office with written notification of students placed on home instruction and renewal notifications as required by N.J.A.C. 6A:14-4.8 (a)1.	A Clerk was assigned to assist with the processing of Out of District and Home Instruction packets. She was trained in the process for submitting packets to the Essex County Supervisor for Child study Teams, Mark Lanzi. A log of all submissions to the Essex County Executive County Office was established and all packets are followed-up on. When the packets return to the Office of Special Education they are inspected for a stamp and signature and then filed.	Supervisor of Special Education	February 1, 2012

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2	Contracts with home instruction vendors should be executed prior to services being provided and all vendor agreements should be supported by an executed contract. The date executed should be indicated on all contracts.	To mitigate the occurrence of services rendered prior to an executed contract, all home instruction contracts, as well as any other district issued contract, will now be initiated by the Purchasing Department. As this occurs, all contracts will be in accordance with established guidelines. A requisition will be required to initiate the procurement process. Purchase Orders will be processed upon final execution of the contract. District policies are distributed to employees and vendors advising them that services may not commence prior to having an executed contract. The district can detect but can not prevent an employee from circumventing district policies and procedures. Purchasing reviews invoice and purchase order dates to detect services rendered prior to issuance of a purchase order and takes the necessary steps to notify the employee and respective supervisor.	Director of Purchasing	February 1, 2012

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3	Deficiencies were noted in contracts with home instruction vendors. The auditor recommends 1) open-end contracts must include maximums; 2) action forms should be completed for all contracts; 3) purchase orders should not exceed contract not-to-exceed amounts; 4) all contracts should be reviewed by the legal dept.; 5) contracts should be centrally located and initiated from Purchasing; 6) home instruction contracts should have an hourly rate established; 7) contracts should not be signed with signature stamps.	Home instruction contracts over the bid threshold had been processed through the Special Education Department. Departments will no longer process and execute contracts. In the future, all home instruction contracts will be processed through the purchasing department. 1) The contracts will indicate maximums on the resolutions; 2) Action forms will be completed for all contracts in excess of the bid threshold; 3) Peoplesoft contract module (newly implemented) will contain maximum amounts payable. The Accouts Payable system will not be able to generate a payment in excess of that amount nor can a PO be created in excess of that amount; 4, 7) All contracts will follow the normal workflow which includes legal review before securing district approvals via original signature; 6) All home instruction contracts will include an hourly rate.	Director of Purchasing	February 1, 2012
4	The auditors recommend that all home instruction expenditures be charged to the correct fiscal year.	Prior to payment, verify that the Office of Special Education entered the receipts against the correct purchase order to ensure expenditures are expensed in the year in which they are incurred.	Supervisor of Accounts Payable	March 1, 2012

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5	The auditors recommend that purchase orders for home instruction services are issued prior to services being rendered.	See finding and recommendation #2 above	Director of Purchasing	February 1, 2012
6	The Auditors recommended that NPS-OHI and NPS-OSE match home students with instructors who are certified in the appropriate content areas, and to periodically request that vendors submit documentation showing that their instructors are properly certified.	1. Determine (using past years' data) the number of students authorized for home instruction services within each of the specific groupings such as the elementary grades, secondary grades, special needs, and ELL groupings, in order to assess where there is and has been the greatest need for services, and therefore instructors.	Supervisor of Home Instruction	February 1, 2012
		2. Determine the number of home instructors within each required area of content certification and determine where there is need for change through either decreasing or increasing the number of staff in those areas.	OAS Deputy Chief Academic Officer Supervisor of Home Instruction	February 1, 2012

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		3. Request from the vendors annually a spreadsheet which requires information on each of the vendors' instructional staff area of certifications, if they will be used to provide services for the upcoming school year.	Supervisor of Home Instruction Director/Supervisor of Special Education	July 1, 2012
7	The auditor recommends that vendor billings for home instruction include students served, date of service(s), and daily hours worked. The Supervisor of Home Instruction should ensure services rendered were required and should review all billings prior to approval for payment. Also, on a test basis, verify hours billed. Revise contracts to specify required documentation for payment.	1. All Home Instruction contracts will be initiated from Purchasing. Contracts will be attached to each Purchase Order and accessible to Accounts Payable staff. New contracts will specify required documentation for payment.	Director of Purchasing	July 1, 2012
		2. Prior to payment, verify that invoices, purchase orders and contracts agree.	Supervisor of Accounts Payable	March 1, 2012

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		3. Require that all vendors that interact with the Office of Home Instruction provide a chart with specific information (student name, dates of service, instructor's name and hours of instruction) that will allow for verification of billable hours as well as a sign-off which will be provided to the Office of Purchasing to be used in rendering payment. Bi-annually require the review of vendor sign-off sheets for their staff from the actual student parents/guardians.	Supervisor of Home Instruction	September 1, 2012
8	The District must ensure that the students receive no less than the minimum hours of instruction required by NJAC.	1. Schedule instructors with no more than 4 students at a time to allow for a full daily teaching schedule with flexibility to fit in periods of instruction to make up time created by student and/or teacher absences.	Supervisor of Home Instruction & Scheduling Assistant / Coordinator	September 1, 2012
		2. Clearly communicate in writing to the families and students of the parental/guardian the requirements and their responsibility for availability in the home.	Supervisor of Home Instruction, Supervisor/Director of Special Education, Director of Health Services, Regional Superintendent/ Special Assistants	March 1, 2012

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9	Fully and accurately complete the "Home Instruction Schedule" as required by N.J.A.C. 6A:14-4.8(3) with clear indication of hours of service, printed name and signature of authorized chaperone/guardian. Provide final approval of schedule as evidenced by signature of Supervisor of Home Instruction.	1. Creation of new forms that allow for the accurate inclusion of N.J.A.C. required information.	Supervisor of Home Instruction	January 1, 2012
		2. Review of all forms utilized in the Office of Home Instruction that require review and Supervisor/Coordinator signature to assure alignment with the schedule.	Supervisor of Home Instruction	January 1, 2012

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10	The District should revise current scheduling procedures to maximize the capacity of existing home instruction staff. Staff not assigned a full daily schedule should be used to cover for unavailable teachers to ensure students receive required hours of instruction. In addition the district should review the feasibility of outsourcing all home instruction services as it could result in cost savings.	1. Discussion with the Coordinator of ERES about the feasibility of and capacity to provide services to the district.	Supervisor of Home Instruction	February 1, 2012
		2. Establish and implement a regular meetings between the hours of 8:10 - 8:30 a.m. to assess staff absences and redirect staff to cover instruction for those students.	Supervisor of Home Instruction	September 1, 2012
		3. Daily review of staff absences.	Clerk & Supervisor of Home Instruction	April 1, 2012



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11	The People Soft system should be revised to ensure all staff work a full day as required by contract.	The changes required to made in People Soft to address the auditors recommendation would require extensive changes to the districts accounting and personnel internal reporting structure, including new job codes and chart of account changes. The district is not able to automate those changes at this time. The district will look at the feasibility of using Kronos to capture the different employee schedules.	Director of Payroll and Labor Relations	January 1, 2013
12	Auditors recommend that the Office of Home Instruction develop a departmental organization chart and detailed policies and procedures which clearly state in writing what work needs to be done and who is responsible for its completeness.	1. Communication and meetings with the other pertinent District Offices of Special Education and Health Services, which serve as referral paths for home instruction services.	Supervisor of Home Instruction	January 1, 2012
		2. Review of previous departmental structural and documents to facilitate the development of an organizational chart and/or operational procedures which clearly delineates directions, responsibilities and responsible parties.	Supervisor of Home Instruction	February 1, 2012

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13	The employee working in the title of Teacher Home Instructor should be providing instructional services versus administrative services. If this individual is to continue in an administrative role he should be moved to an appropriate job title.	Reschedule the employee to be in the field.	Supervisor of Home Instruction	September 1, 2012
14	The Office of Home Instruction should maintain accurate lists of students eligible for home instruction. Billings from vendors should be compared to the list monthly. Documentation supporting a student's placement in home instruction should be maintained and be readily available.	1. Weekly review of the Student Roster spreadsheet to ensure that all students are listed with accurate demographic information.	Clerk & Supervisor of Home Instruction	January 1, 2012
		2. Weekly review and cross reference of the Student Referral spreadsheet sent from the office of Health Services.	Office of Health Services Clerk Office of Home Instruction Clerk	January 1, 2012

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		3. Weekly review and cross reference of the Student Referral spreadsheet sent from the office of Special Education.	Office of Special Education Clerk, Office of Home Instruction Clerk	March 1, 2012
		4. NPS contracted vendors must be required and directed to submit a monthly spreadsheet with specific information so that verification can be provided to office of Special Education who authorizes payments to the vendors.	Supervisor of Home Instruction, Director/Supervisor of Special Education	July 1, 2012
		5. Review previous files housed to date and create a filing system which meets the internal needs of the office to manage paperwork and allows effective and efficient access to documents.	Clerk & Supervisor of Home Instruction	February 1, 2012
15	The auditors recommend that the district ensure that notices of home instruction service contracts are published in an official newspaper as required by N.J.S.A. 18A.18A-5a (1).	All Professional services awards will be published monthly.	Director of Purchasing	Present

