



State of New Jersey

DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DAVID C. HESPE
Commissioner

September 8, 2016

Ms. Tacia Johnson, Board President
Montague Township School District
475 Route 206
Montague, NJ 07827

Dear Ms. Johnson:

SUBJECT: Montague Township School District – Attorney Billing Practice Review
OFAC Case #INV-033-16

The Department of Education, Office of Fiscal Accountability and Compliance (OFAC) completed a review of the process and methodology utilized by the Montague Township School District's Board of Education (Board) to award a legal services contract for the Montague Township School District (District). As a result of the review, the OFAC has identified material issues of noncompliance with the N.J.S.A. 18A:18A-5a.1 and N.J.A.C. 6A:23A-5.2(a)3. The issues of noncompliance are detailed in the attached Report of Examination. Please provide a copy to each board member.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Montague Township School District 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 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 District's website. Should you have any questions, please contact Thomas C. Martin, Manager, Investigations Unit, at (609) 633-9615.

Sincerely,

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

RJC/E:\ffrangella\Montague\INV-033-16\Report\Closing Letter.docx
Attachments

c: Robert Bumpus
Thomas C. Martin
Rosalie S. Lamonte
Janice L. Hodge
Michael Yaple
Stephen Eells

www.nj.gov/education

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MONTAGUE ELEMENTARY
SCHOOL

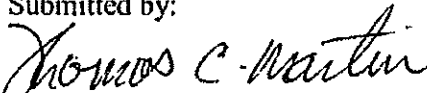
CONCLUSION

The OFAC review determined the District did not adhere to the provisions of N.J.S.A. 18A:18A-5a.1 and N.J.A.C. 6A:23A-5.2(a)3 concerning its legal costs exceeding the statewide average.

RECOMMENDATIONS

The District shall prepare a Corrective Action Plan indicating the measures it will implement to ensure compliance with the applicable provisions of the N.J.S.A. 18A:18A-5a.1 and N.J.A.C. 6A:23A-5.2(a)3.

Submitted by:


Thomas C. Martin, Manager
Investigations Unit

Approved by:


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

Investigator:
Francesco Frangella

STATE OF NEW JERSEY
DEPARTMENT OF EDUCATION
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE
INVESTIGATIONS UNIT

MONTAGUE TOWNSHIP SCHOOL DISTRICT
ATTORNEY BILLING PRACTICE REVIEW
OFAC CASE #INV-033-16

REPORT OF EXAMINATION
SEPTEMBER 2016

INVESTIGATIVE SUMMARY

On August 16, 2016, the New Jersey Department of Education, Office of Fiscal Accountability and Compliance (OFAC) completed a limited review of the Montague Township School District (District) Board of Education (Board) attorney billing practices. The review was prompted by concerns that the District's legal fees exceeded 130 percent of the statewide average per pupil.

In August of 2016, the OFAC investigator initiated an investigation into the concerns and conferred with District's Business Administrator (BA). The investigator also reviewed relevant documents including Board minutes, purchase orders, payments, and Taxpayers' Guide to Educational Spending (TGES).

On June 27, 2016, the Board, through resolution, appointed the firm of Dagget & Kraemer, Esq. as Board counsel at the rate of \$160.00 per hour. The OFAC review disclosed the District awarded the contract without following competitive contracting requirements by not advertising for RFP's or another comparable process. The District also did not advertise in an official newspaper the supporting reasons for the award.

Contracting for the Board's legal services falls under the professional services exemption of N.J.S.A. 18A:18A-5a.1, which exempts services from bid requirements. However, N.J.A.C. 6A:23A-5.2(a)5, requires school districts to utilize a deliberative and efficient process that ensures the district receives the highest quality services at a fair and competitive price or through a shared services agreement.

Whenever a district utilizes competitive contracting to acquire legal services, the district is required to publish a notice of the availability of the request for proposal (RFP) documentation in the district's official newspaper at least 20 days prior to the proposal submission date. Additionally, if a district awards a contract by utilizing the professional services exemption or competitive contracting, the district must announce the award by publishing a notice in its official newspaper. The notice shall include, but not be limited to, the nature, duration, and the dollar amount of the contract. It shall also include the name of the vendor and a statement that the resolution and contract are on file and available for public inspection in the office of the secretary of the board of education.

In addition, a review of the TGES disclosed the District's legal fees exceeded 130 percent of the statewide average per pupil. According to the BA, the District did not follow the provisions of N.J.A.C. 6A:23A-5.2(a)3 which requires that districts with legal costs that exceed 130 percent of the statewide average per pupil amount should establish procedures and, if not established, provide evidence that such procedures result in a reduction of costs. The procedures should include a limitation on number of contact persons with the authority to contact attorney, criteria to prevent the unnecessary use of counsel for routine management decisions or readily available information, a provision that requests for legal advice be in writing, a provision to maintain a log of all legal contact.

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.

RESOLUTION

WHEREAS, the Office of Financial Accountability and Compliance (OFAC) of the New Jersey Department of Education has conducted a limited review of the Montague Township Board of Education's (BOE) attorney billing practice with a report dated September 2016; and

WHEREAS, the OFAC report found that the BOE's legal expense has exceeded the 130% of the statewide per pupil average (SPPA) for the school years 2013-2014 and 2014-2015; and

WHEREAS, the legal expense for the District during the 2013-2014 school year for services rendered by prior BOE counsel Cherie Adams, Esq. was nearly triple the baseline figure of 130% of the SPPA; and

WHEREAS, the legal expense for the District for the 2014-2015 school year was about double the baseline figure of 130% SPPA utilizing the services of present BOE counsel Gary Kraemer, Esq. and present special litigation counsel Daniel Perez, Esq., a significant reduction to the fees charged by Adams, yet still above the 130% of SPPA; and

WHEREAS, neither of the school business administrators employed by the BOE during this period (neither of whom is still employed by the BOE) alerted the BOE that the 130% threshold was being neared in either school year; and

WHEREAS, the BOE policy 3327 and bylaw 9126 address the concerns raised in the OFAC report; and

WHEREAS, the BOE appointed Gary Kraemer, Esq. as special counsel in April 2015 following public advertising for the position and interviews with interested candidates; and

WHEREAS, the BOE retained Mr. Kraemer as legal counsel at the hourly rate of \$160.00 per hour which was competitive with rates charged by the BOE's other attorney; and

WHEREAS, the BOE appointed Mr. Kraemer as interim legal counsel at the same hourly rate as previously charged on May 27, 2015 following the resignation of Cherie Adams, Esq., and

WHEREAS, the BOE intends to continue taking reasonable measures to control the District's legal expense to the greatest extent possible; and

WHEREAS, the District's legal expense of nearly triple the 130% SPPA baseline figure in 2013-2014 was charged by Cherie Adams, Esq. who is no longer retained by the District; and

WHEREAS, a large portion of the District's legal expense for the 2014-2015 school year (significantly reduced from the legal expense incurred with Cherie Adams, Esq. as BOE legal counsel) was incurred in defending new BOE members on ethics charges maliciously brought against them by members or supporters of the prior BOE voted out of office, and also in

Reviewing and correcting improper procedures (Sunshine Law and the District's send-
receive relationships in particular) that had developed under prior counsel Cherie
Adams, Esq.;

NOW THEREFORE, Be it Resolved as follows:

1. The Board bylaw 9126 is hereby ratified, and the present practice followed by
this Board since May 2015 (Cherie Adams, Esq. resignation) that contact with
Board legal counsel regarding Board and school district issues is limited to the
Board president, chief school administrator, and school business
administrator/board secretary.
2. The School Business Administrator shall review and track legal bills and shall
give written notice to the Board at any time that the annual expense for legal
services reaches 80% of the SPPA for legal services, so that appropriate
measures may be undertaken.
3. Administrative personnel shall continue the present practice requesting legal
services from Board counsel for information that is readily available to them such
as School District Policies or Bylaws.
4. The Board policy 3327 is hereby ratified and the present practice followed
since May 2015 (Cherie Adams, Esq. resignation) that requests to Board counsel
for legal advice shall be submitted in writing.
5. The Board president, chief school administrator, and school business
administrator shall maintain logs to document contacts with Board legal counsel
including dates and lengths of contacts for periodic review to determine that
requests for legal advice are necessary.

6. At least every three (3) years the Board will solicit RFP's from attorneys who may be interested in serving as legal counsel to the School District, and this will be addressed for all professionals in the District's Policy Manual.

Motion EM 2nd GP (TJ) (GA) (DC) (SK) (EM) (GP) (LS)

Date of Adoption: November 1, 2016

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

SCHOOL DISTRICT NAME: Montague Township School District COUNTY Sussex

TYPE OF EXAMINATION: Attorney Billing Practice Review

DATE OF BOARD MEETING: November 1, 2016 and October 24, 2016

CONTACT PERSON: Janice Hodge, CSA

TELEPHONE NUMBER 973-293-7131, ext. 203

FAX NUMBER: 973-293-3391

RECOMMENDATION NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
1. 18A:18A-5(a)(1)	At minimum of every three years the BOE will solicit RFP's from attorney's who may be interested in serving as legal counsel for the District	Amend BOE Policy #3327 to require RFP's at least every three years from professionals interested in providing services to the District	Tacia Johnson, BOE President	ONGOING
			INDIVIDUAL	COMPLETION

Janice Hodge
Janice Hodge, CSA 11/12/16
Chief School Administrator Date

(presently vacant position; District in midst of search process for replacement)
Board Secretary/Business Administrator Date

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

RECOMMENDED NUMBER	CORRECTIVE ACTION	METHOD OF IMPLEMENTATION	RESPONSIBLE FOR IMPLEMENTATION	DATE OF IMPLEMENTATION
2. 6A:23A-5.2(a)(3)	<ol style="list-style-type: none"> 1. Continue present practice/policy of limiting contacts with BOE legal counsel to the District CSA, BOE Pres., and District SBS/BS 2. Continue present practice/policy for requests to BOE legal counsel to be in writing. 3. Continue present practice of not requesting legal services for information readily available in School District Policies/Bylaws. 4. SBA to review and track annual expense for legal services and give written notice to BOE when such expense reached 80% of SPPA so that appropriate measures may be undertaken. 5. BOE Pres., CSA, and SBA/BS to maintain logs of contacts with legal counsel including dates and length of contacts for periodic review. 	<ol style="list-style-type: none"> 1. Memo to BOE members and District administration, explaining the limitation. 2. Memo to BOE President and District CSA and SBA of the necessity for written request. 3. Memo to BOE President, CSA, and SBA that legal services should not be requested for readily available information. 4. Memo to SBA informing him of the duty to track annual legal expense. 5. Memo to BOE President, CSA, and SBA/BS informing of the requirement to maintain contact log. 	<ol style="list-style-type: none"> 1. BOE President 2. BOE President. 3. BOE President 4. SBA/BS 5. BOE President, CSA, and BA/BS 	All Ongoing

James L. Hodge
~ James Hodge, Chief School Administrator

11/12/14 Date

Board Secretary/Business Administrator

Date



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

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

KIMBERLEY HARRINGTON
Acting Commissioner

November 18, 2016

Ms. Tacia Johnson, Board President
Montague Township School District
475 Route 206
Montague, NJ 07827

Dear Ms. Johnson:

SUBJECT: Montague Township School District – Attorney Billing Practice Review
OFAC Case #INV-033-16

The Department of Education, Office of Fiscal Accountability and Compliance has received and reviewed the corrective action plan (CAP) prepared and submitted by the Montague Township School District in response to the investigative report dated September 8, 2016. The CAP is considered complete and acceptable; therefore, the examination file is closed.

As part of the corrective action process, the Sussex County Office of Education will be provided a copy of the CAP to monitor the District's progress in implementing the plan.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Cicchino".

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

RJC/I:\ffrangella\Montague\INV-033-16\CAP\CAP Closeout.docx

c: Robert Bumpus
Michael Yaple
Rosalie S. Lamonte
Thomas C. Martin
Francesco Frangella



GARY A. KRAEMER
gkraemer@kandclaw.com

JOSEPH M. CORAZZA**
jcorazza@kandclaw.com
**Member of NJ and NY Bars

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Sparta, New Jersey 07871
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October 14, 2016

Robert J. Cicchino, Director
Office of Fiscal Accountability and Compliance
Department of Education
P.O. Box 500
Trenton, NJ 08625-0500

Re: Montague Township School District – Attorney Review Billing Practice
OFAC Case No.: INV-033-16

Dear Mr. Cicchino:

I am the attorney for the Montague Township Board of Education, which is the subject of the above captioned OFAC investigation.

The Board of Education will be addressing the OFAC Report at its next regular public meeting on October 24, 2016, but in order to do so with the necessary insight and information, the Board has asked that I obtain some clarification from you regarding what is meant by the reference in the first paragraph of the OFAC Report to the District's legal fees exceeding "130 percent of the statewide average per pupil." The last paragraph on the bottom of the same first page of the report in the first sentence similarly indicates that a review of the TGES disclosed the District's legal fees "exceeded 130 percent of the statewide average per pupil."

Does the 130 percent benchmark figure reference the statewide average of total spending per pupil in the Taxpayers' Guide to Education Spending 2016, or is it just 130 percent of the statewide average per pupil for legal fees? The Taxpayers' Guide to Education Spending 2016 which is on the DOE website indicates that for the last school year for which fees are available, 2014-2015, the statewide average of total spending per pupil is \$19,652.00. 130 percent of that figure is \$25,548.00. Is this the figure the OFAC Report references as the standard which Montague Township was found to have exceeded?

If the benchmark referenced in the OFAC Report is 130 percent of the statewide average for legal fees, would you please indicate what that statewide average per pupil figure is for legal fees, and advise where that figure is contained in the TGES. Thank you.

Yours truly,
KRAEMER & CORAZZA

By: GARY A. KRAEMER

GAK/bb
Cc: Tacia Johnson, Montague BOE President



GARY A. KRAEMER
gkraemer@kandclaw.com

JOSEPH M. CORAZZA**
jcorazza@kandclaw.com
**Member of NJ and NY Bars

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Sparta, New Jersey 07871
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www.kandclaw.com

November 14, 2016

Robert J. Cicchino, Director
Office of Fiscal Accountability and Compliance
Department of Education
P.O. Box 500
Trenton, NJ 08625-0500

Re: Montague Township School District – Attorney Review Billing Practice
OFAC Case No.: #INV-033-16

Dear Director Cicchino:

As a follow up to my letter to you dated November 10, 2016, enclosed please find the signed CAP and Resolution in connection with the above captioned matter. Thank you.

Yours truly,
KRAEMER & CORAZZA

By:  GARY A. KRAEMER

GAK/bb
Cc: Robert L. Bumpus, Assistant Commissioner
Cc: Rosalie S. Lamonte, Sussex County Executive Superintendent
Cc: Janice Hodge, Montague Township CSA
Cc: Tacia Johnson, BOE President

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

SCHOOL DISTRICT NAME: Montague Township School District COUNTY Sussex

TYPE OF EXAMINATION: Attorney Billing Practice Review

DATE OF BOARD MEETING: November 1, 2016 and October 24, 2016

CONTACT PERSON: Janice Hodge, CSA

TELEPHONE NUMBER 973-293-7131, ext. 203

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1. 18A:18A-5(a)(1)	At minimum of every three years the BOE will solicit RFP's from attorney's who may be interested in serving as legal counsel for the District	Amend BOE Policy #3327 to require RFP's at least every three years from professionals interested in providing services to the District	Tacia Johnson, BOE President	ONGOING
			INDIVIDUAL	COMPLETION

Janice Hodge
Janice Hodge, CSA
11/12/16

Chief School Administrator _____ Date _____

(presently vacant position; District in midst of search process for replacement)
Board Secretary/Business Administrator

Date _____

**NEW JERSEY DEPARTMENT OF EDUCATION
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Janice Hodge
Janice Hodge, Chief School Administrator

11/2/14

Date

Board Secretary/Business Administrator

Date

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

SCHOOL DISTRICT NAME: Montague Township School District COUNTY Sussex

TYPE OF EXAMINATION: Attorney Billing Practice Review

DATE OF BOARD MEETING: November 1, 2016 and October 24, 2016

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Janice Hodge
 Janice Hodge, CSA
 11/12/16
 Chief School Administrator

(presently vacant position. District in midst of search process for replacement)
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~Janice Hodges, Chief School Administrator

Janice Hodges

11/21/14

Date

Board Secretary/Business Administrator

Date