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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
July 2019

**District:** Edison Township School District  
**County:** Middlesex  
**Dates On-Site:** May 7, 8 and 9, 2019  
**Case #:** CM-003-19

**Funding Sources**

Program	Funding Award
Title I, Part A	\$1,260,731
IDEA Basic	4,187,102
IDEA Preschool	124,907
Title II, Part A	421,849
Title III	92,631
Title III Immigrant	110,275
Title IV, Part A	76,022
Total Funds	<u><u>\$6,273,517</u></u>

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

**Background**

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The Every Student Succeeds Act (ESSA) 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 (ESSA and IDEA). 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**

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The NJDOE visited the Edison Township Public Schools 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); Title III; Title III Immigrant, Title IV, Part A (Title IV), IDEA Basic and Preschool for the period July 1, 2018 through April 30, 2019.

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**

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The grants reviewed included Title I, Title II, Title III, Title III Immigrant, Title IV, IDEA Basic and Preschool from July 1, 2018 through April 30, 2019. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**General District Overview of Uses of Title I and IDEA Funds**

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**Title I Projects**

The district is using its fiscal year 2018-2019 Title I funds to implement a schoolwide program in one elementary school, and targeted assistance programs in five other Title I schools. Primarily,

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

the district provides supplemental instructional opportunities through extended day and extended year programs.

**Title II-A Projects**

The Edison Township School District used the Title II-A allocation to fund three full-time staff development trainers, one 21<sup>st</sup> century skills trainer, learning leader stipends, and attendance at literacy conferences.

**Title III and Title III Immigrant Projects**

Edison Township School District has over 400 English language learners (ELLs) and immigrant children and youth. The school district offers bilingual programs part-time in two elementary schools to Spanish- and Gujarati-speaking students. There are 8-magnet schools which implement Hi-intensity ESL programs. The method of ESL instruction is primarily push-in. According to the Chief Academic Officer, Debra Gulick, Title III funds are primarily used for a community outreach program, C.A.R.E., and a summer literacy program. Title III Immigrant funds are primarily used for an adult ESL program.

**Title IV-A Projects**

The Edison Township School District budgeted their Title IV-A allocation for bullying and harassment prevention activities and programs, a middle school STEM Academy, school-based mental health services and supports such as staff development on Narvan, wellness and nutrition, professional development in the use of technology for teachers and instructional leaders for 21<sup>st</sup> century skills, and software to allow interventionists and supervisors to use assessment data to identify trends and work with students.

**IDEA Projects (Special Education)**

The FY 2019 IDEA funds are being used to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities, to partially fund occupational therapy services and physical therapy services to students with disabilities and are also being used for professional development, instructional supplies and materials for staff members supporting students with disabilities. Additionally, IDEA funds are being expended to support students with service plans in nonpublic settings.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

The district did not provide evidence of established entrance and exit criteria used to determine Title I student eligibility in the Middle and High School. The monitors were unable to verify the process used to select and serve Title I students.

**Citation:**

ESEA §1115: Targeted Assistance Schools

**Required Action:**

The district must establish entrance and exit criteria and a tracking mechanism for proper Title I student identification. This mechanism must include documentation of the use of multiple, educationally related, objective criteria to identify students for eligibility to receive Title I services.

**Finding 2:**

The district is using Title I funds to support the Middle and High School by operating an AVID (Advancement Via Individual Determination) college prep program for highly motivated students with average and medium to high standardized test scores. This program is open to students who meet the AVID criteria and does not support students most academically at risk.

**Citation:**

ESEA §1115: Targeted Assistance Schools.

**Required Action:**

The district must use state and/or local funds, rather than federal funds, to provide this program for all students. The district must update its Title I program to reflect the operation of a Title I Targeted Assistance program in accordance with the required eight components of a targeted assistance program. The district must submit a detailed description of its updated Title I program with emphasis on providing supplemental services to identified participating students. The program description must include the multiple measures used to identify participating Title I students, how students will be assessed, and the frequency of these assessments. Lastly, the description must provide the criteria used to enter and exit students in the program. The district must submit the updated program description to the NJDOE for review.

**Recommendation:**

The district should consider applying for schoolwide status in all five of its targeted assistance schools in order to upgrade the academic program for all students.

**Finding 3:**

The notification letters sent to the parents/guardians of identified Title I students in the Elementary Schools did not include clearly defined entrance and exit criteria. The parents/guardians of identified Title I students must be informed of the multiple educationally related criteria used to identify their child/children for Title I services.

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

**Citation:**

ESEA §1115: Targeted Assistance Schools; ESEA §1118(c): Parental Involvement (Policy Involvement).

**Required Action:**

Each school's parent notification letters must include clearly defined entrance and exit criteria. The school must provide a copy of its revised parent notification letter for FY 2019-2020 to the NJDOE for review.

**Finding 4:**

The district did not provide both district level and school-level Title I parent and family engagement policies for all six Title I schools.

**Citation:**

ESEA §1116(a)(2): Parent and Family Engagement (Written Policy); ESEA §1116(b): Parent and Family Engagement (School Parent and Family Engagement Policy).

**Required Action:**

The district must have both a written district parent and family engagement policy and school-level parent and family engagement policy developed with parental input. Both policies must be evaluated annually. The district should provide technical assistance to its schools in the development of school-level parent and family engagement policies and ensure that its schools work with their stakeholder groups to develop the policies and review it annually. The district must submit copies of a recent board approved district parent and family engagement policy and school-level policies to the NJDOE for review. The district must also submit evidence of engaging parents in the development and review of the policies (meeting agendas, sign-in sheets, minutes), and evidence of the board's adoption of the district level policy (board meeting minutes).

**Finding 5:**

The district's Title I schools did not provide information to parents in multiple languages. Schools are required to provide information to parents of students participating in Title I programs in a language that is understandable and in a uniform format, including alternative formats upon request.

**Citation:**

ESEA §1116(b)(1): Parent and Family Engagement (School Parent and Family Engagement Policy); ESEA §1116(d)(2)(D): Parent and Family Engagement (Shared Responsibilities for High Student Academic Achievement).

**Required Action:**

The school must have all required documents translated into a language that is understandable to the parents of the students served. The documents that must be in

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

multiple languages are the District/School Parent and Family Engagement Policy, Parent-School Compact, Title I Parent Notification Letter, and the Parents' Right to Know Letter, at a minimum.

**Finding 6:**

The school provided limited evidence of an active stakeholder committee involved in the development of the Annual School Plan at Lindenau Elementary School. There was no evidence, such as meeting notes, agendas and sign in sheets, that the full committee was consulted in the development and implementation of the Title I Annual School Plan.

**Citation:**

ESEA 1114(b)(2)(B)(ii): Plan Development.

**Required Action:**

The school must convene and/or consult with its stakeholder committee for input and peer review before changes are made to the Annual School Plan. These meetings and consultations must be documented with an agenda, sign in sheets and minutes, and uploaded as part of the Annual School Plan.

**Finding 7:**

The district could not provide evidence that the following schools convened an annual Title I parent meeting: Washington, Thomas Jefferson, Herbert Hoover, and Edison High School. Not conducting an annual meeting to explain the Title I legislation and the district's Title I programs in the beginning of the year does not allow parents of identified Title I students to be informed and vested in the Title I process from the beginning.

**Citation:**

ESEA §1116(c): Parental and Family Engagement (Policy Involvement).

**Required Action:**

The district must ensure that its Title I schools convene an annual Title I meeting, at the beginning of the school year, to inform all parents of the legislative requirements, and the school's Title I program.

**Finding 8:**

There was no evidence that the district distributed a school-parent compact for the current school year in the following schools: Benjamin Franklin, Thomas Jefferson, Herbert Hoover, and Edison High School. Additionally, the school-parent compact provided for Washington was dated 2015-2016.

**Citation:**

ESEA §1116(d): Parent and Family Engagement (Shared Responsibilities for High Student Academic Achievement).

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

**Required Action:**

The district must ensure that each Title I school has a school-parent compact that is developed with the input of parents and distributed directly to parents of students participating in the Title I program. The district must submit copies of the school-parent compact and evidence of the involvement of parents and families, of Title I students, in its development to the NJDOE for review.

**Finding 9:**

The district provided evidence of distribution of the required Parents Right to Know Letter; however, the letter referenced the *No Child Behind Act of 2001 (NCLB)* instead of the *Elementary and Education Act of 1965 (ESEA)*, as amended by the *Every Student Succeeds Act of 2015 (ESSA)*.

**Citation:**

ESEA §1112(e): Local Educational Agency Plans: (Parents Right-to-Know)

**Required Action:**

Beginning with the FY 2019-2020 *ESEA* project period, the district must update the Parents Right to Know Letter, as well as all other *ESEA* correspondence, to include references to *ESEA* rather than *NCLB*.

**Finding 10:**

The district's use of Title I funds for a Jets AVID Day, which included tickets to a future Jets game, is an unallowable cost.

**Citation:**

2 CFR §200.438 Cost Principles: Subpart E (Entertainment Costs)

**Required Action:**

The district must reverse the Title I costs for the tickets purchased for the Jets AVID Day, and allocate state/local funds for these costs. The district must provide evidence of the adjusting entry to the NJDOE for review. The schools' 2018-2019 Title I final expenditure report must also reflect this reversal.

**Title II-A**

**Finding 11:**

The STEM Academy for Young Kids did not receive their allocation.

**Citation:**

E.S.E.A. §1117, §2103(b)(2)(E), and §8501

**Required Action:**

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

Contact the STEM Academy for Kids and follow procedures to consult and provide services.

**Finding 12:**

Research to support each activity must be more specific to the intervention requested and include research studies supporting the intervention. For more information about Choosing Evidence-based Practices, see the link in the district resources on the [NJDOE \*Choosing Evidence-Based Practices\* ESSA web page](#). Levels of evidence are 1. Strong – (Experimental Study) 2. Moderate – (Quasi-experimental) 3. Promising – (Correlational Study with Controls), or 4. Demonstrates a Rationale (logic Model).

**Citation:**

E.S.E.A. §8101(21)(A)

**Required Action:**

Provide research/evidence for the needs that have been identified. Stakeholders should note relevant evidence-based activities, when evidence is available, that will have the likelihood of working in the local context. When *strong evidence* or *moderate evidence* is not available *promising evidence* may suggest that an intervention should *demonstrate a rationale* for how they will achieve their intended goals and be examined to understand how they are working.

Please review the optional District Professional Development Plan template to ensure that the PD plan contains the same elements and is signed by the superintendent prior to uploading to the NJDOE website.

**Title III and Title III Immigrant**

**Finding 13:**

Title III requires school districts to ensure that funded teachers have met requirements for teacher certification as appropriate for the instruction they are delivering. The district's use of Title III funds to pay for teacher salaries totaling \$12,478.50 is not an allowable use of funds because appropriate certifications were not provided.

**Citation:**

ESEA §3116(c) Teacher Certification.

**Required Action:**

The district must reverse the expenditure of Title III funds for teacher salaries and submit documentation of the adjusting entry to the NJDOE for review or submit evidence of ESL certification for each of the staff who did not meet the certification requirement in the summer ESL literacy program.



**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

**Recommendation:**

The district must retain staff certification records of all employees.

**Finding 14:**

All districts in New Jersey must screen and test students for English language learner (ELL) identification as per N.J.A.C. 6A:15:1.3. As ELL screening is a state requirement, Title III funds must be used to supplement, not supplant, state requirements. The district's use of Title III funds to pay for teacher salaries totaling \$15,912.50 to assess incoming students during summer months supplanted state and local funds because screening is a state requirement.

**Citation:**

ESEA §3115(g) Supplement not supplant.

**Required Action:**

The district must reverse the expenditure of Title III funds for teacher salaries and submit documentation of the adjusting entry to the NJDOE for review.

**Finding 15:**

LEAs must use Title III Immigrant funds to pay for activities that provide enhanced instructional opportunities for immigrant students and their families. An LEA must use Title III Immigrant funding for separate and distinct purposes than Title III funding. The district's use of Title III Immigrant funds is not in accordance with the allowable uses in the law and code for approved programs and services to address the unique needs of immigrant students and their families. The expenses totaling \$2,471.52 are not distinct and unique for immigrant children and youth.

- 2 Georgian-English/English Georgian Dictionary and Phrasebook \$36.85 PO 19-04796-C Order Date 1/7/19
- 75 ESL Reading Smart/Reading Mate Program License \$1,425.00 PO 19-01131-C Order Date 8/15/18
- 20 Scholastic News Grade 5/6 \$126.50 PO 19-01134-C Order Date 8/15/18
- 30 Scholastic Action Magazine \$313.17 PO 19-01133-C Order Date 8/15/18
- 30 Easy English News \$570.00 PO 19-01132 Order Date 8/15/18

**Citation:**

ESEA §3115(e) Allowable Use.

**Required Action:**

The district must reverse the expenditure of Title III Immigrant funds for supplies and submit documentation of the adjusting entry to the NJDOE for review.

**Finding 16:**

LEAs must use Title III Immigrant funds to pay for activities that provide enhanced instructional opportunities for immigrant students and their families. An LEA must use Title III Immigrant

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

funding for separate and distinct purposes than Title III funding. The district's use of Title III Immigrant funds to pay for the software database ELLevation totaling \$9,300.00 is not an allowable use (Requisition #6104, Date 2/7/18). The expense is not distinct and unique for immigrant children and youth.

**Citation:**

ESEA §3115(e) Allowable Use.

**Required Action:**

The district must reverse the expenditure of Title III Immigrant funds for supplies and submit documentation of the adjusting entry to the NJDOE for review.

**Recommendation:**

Districts should ensure allowable activities specifically support the needs of children, youth, and their families who are new to the country and the U.S. school system.

**Finding 17:**

The district's use of Title III Immigrant funds to pay for teacher salaries for adult ESL classes is not an allowable use because the teacher certification provided did not substantiate ESL certification for six of the instructors paid totaling \$4,800.00.

**Citation:**

ESEA §3115(g) Allowable Use.

**Required Action:**

The district must reverse the expenditure of Title III Immigrant funds for teacher salaries and provide documentation of the adjusting entry to the NJDOE for review or submit evidence of ESL certification for each of the staff who do not meet the certification requirement in the adult ESL literacy program.

**Recommendation:**

The district must retain staff certification records of all employees.

**Finding 18:**

The notification letters sent to the parents/guardians of identified ELLs did not include all the required components of the parent notification letter. The district presented a template parent notification letter but did not provide evidence of dated entrance notification letters to parents of ELLs in English and languages other than English, which reflect the linguistic need of the families of Edison's ELL school community. Evidence of exit notification were provided in English only but did not fully meet the requirements. The district must ensure the notification letter fully meets the Title III Parent Notification Requirements, including distributing the notification to parents in an understandable and uniform format and, to the extent practicable, in a language the parents understand; description of method instruction that will be used to serve ELLs, other methods of instruction, and how those methods may differ in content and

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

instructional goals, etc.; expected rate of transition into classroom not tailored for ELL students. For exit notification, the district must provide parents/guardians the score report used to determine exit status.

**Citation:**

ESEA §1112(e) Parent Notification.

**Required Action:**

The district's Title III parent notification letter needs to fully describe all ELL program types and indicate the students' expected rate of transition into a mainstream classroom in a format understandable to the parent. The district must retain a copy for each notification letter. In addition, the district must implement outreach activities to parents to help them participate in their children's education.

**Finding 19:**

The district was unable to provide evidence demonstrating how ELLs are served in non-public schools and how their English language proficiency progress is measured. Purchase orders which verified that instructional supplies and services purchased for non-public schools with Title III funds are being spent in accordance with authorized use of funds were not provided.

**Citation:**

ESEA §8501 Non-public Use of Funds.

**Required Action:**

In addition to consultation with non-public schools, the district must maintain documentation of services and monitor how ELLs are progressing (e.g. track assessment data).

**Title IV-A**

**Finding 20:**

E.S.E.A. Section 4106(d) requires LEAs that receive a minimum of \$30K to *develop a comprehensive needs assessment and create a plan* that addresses each of the three categories. This required *Needs Assessment* was not created. Please be conscious that the Needs Assessment committee should consist of Stakeholders, including at least one student.

**Citation:**

E.S.E.A. Section 4106(d)

**Required Action:**

The district must conduct a comprehensive needs assessment of the local educational agency or agencies proposed to be served under this subpart in order to examine needs for improvement of:

(A) access to, and opportunities for, a well-rounded education for all students;

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

- (B) school conditions for student learning in order to create a healthy and safe school environment; and
- (C) access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

**Finding 21:**

Research to support each activity must be more specific to the intervention requested and include research studies supporting the intervention. For more information about Choosing Evidence-based Practices, see the link in the district resources on the [NJDOE Choosing Evidence-Based Practices ESSA web page](#). Levels of evidence are 1. Strong – (Experimental Study) 2. Moderate – (Quasi-experimental) 3. Promising – (Correlational Study with Controls), or 4. Demonstrates a Rationale (logic Model).

**Citation:**

E.S.E.A. §8101(21)(A)

**Required Action:**

Provide research/evidence for the needs that have been identified. Stakeholders should note relevant evidence-based activities, when evidence is available, that will have the likelihood of working in the local context. When *strong evidence* or *moderate evidence* is not available *promising evidence* may suggest that an intervention should *demonstrate a rationale* for how they will achieve their intended goals and be examined to understand how they are working.

**IDEA (Special Education)**

A review of expenditures charged to the IDEA grant yielded no findings.

**Administrative**

**Finding 22:**

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:**

Uniform Grant Guidance 2 C.F.R. 200.302; 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.

**Finding 23:**

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

The board minutes contained some but not all the required information such as funding source, account number, position, annual/funded salary and percentage charged for federally funded positions. Also, the board minutes contained - for stipend compensation - some but not all of the required information such as account number, position, hourly rate, number of hours and not to exceed amount.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302

**Required Action:**

The district should update its internal controls to ensure that the board minutes contain the required information.

**Finding 24:**

The district did not comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with Title I funds must complete a semi-annual certification attesting to their performance of Title I related duties, and employees with less than 100 percent of their salary paid with Title I funds must complete monthly personal activity reports.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302

**Required Action:**

The district must ensure that employees submit personal activity reports that have been verified by supervisors, as required.

**Finding 25:**

The district is charging Title IV expenditures to the incorrect program code in the general ledger. Title IV is being charged to program code 261; a code between 280 and 289 should be used for Title IV.

**Citation:**

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

**Required Action:**

The district must establish accounts using appropriate program codes in the general ledger.

**Finding 26:**

The district failed to adhere to New Jersey Public School Contracts Law (PSCL) and federal regulations when purchasing certain professional development services over the bid threshold. The district failed to have a competitive process as required.

**Edison Township School District  
Collaborative Monitoring Report  
July 2019**

**Citation:**

N.J.S.A. 18A:18A-4 *Contracts and agreements requiring advertising*, Uniform Grant Guidance 2 C.F.R. 200.302

**Required Action:**

The district must comply with current federal and state procurement regulations.

**Finding 27:**

The district's purchasing manual that details procedures for the procurement of goods and services is outdated.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302. N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions.

**Required Action:**

The district should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

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.nj.gov](mailto:steven.hoffmann@doe.nj.gov).