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Department of Education  
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**Highland Park School District**  
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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2020

**District:** Highland Park School District  
**County:** Middlesex  
**Dates On-Site:** December 3, 4 and 5, 2019  
**Case #:** CM-013-20

**Funding Sources**

Program	Funding Award
Title I, Part A	\$338,548
IDEA Basic	532,881
IDEA Preschool	13,644
Title II, Part A	70,639
Title III	22,778
Title III, Immigrant	14,509
Title IV, Part A	18,385
Total Funds	<u><u>\$1,011,384</u></u>

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**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 state education agencies such as the New Jersey Department of Education (NJDOE) to monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

**Introduction**

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The NJDOE visited the Highland Park School District 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, 2019 through November 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 were Title I, Title II, Title III, Title III Immigrant, Title IV, IDEA Basic and Preschool from July 1, 2019 through November 30, 2019. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**General District Overview of Uses of Federal Funds**

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**Title I Projects**

The district is using its 2019-2020 Title I funds to implement targeted assistance programs in two elementary schools as well as the high school and a schoolwide program in the middle school.

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

**Note:** The district was granted schoolwide status for its three targeted assistance schools, which was to be in effect for the 2019-2020 school year. However, the district's schoolwide status was rescinded due to the district not meeting the highly qualified paraprofessional requirement in those schools. The district was formally notified of this change during the monitoring visit and was informed that our office would work with them to make any necessary programmatic changes.

### **Title II-A Projects**

The Highland Park's Title II-A funds are used to pay teachers to prepare to present professional development opportunities that highlight best practices and align with the district plan; coaches that work with teachers in a co-teaching model to help teachers reach their highest potential; Social Emotional Learning practices such as *Restorative Justice*, Responsive Training, Language Arts Literacy and Mathematics workshops and for an online professional development platform. The local nonpublic school uses their equitable share of the Title II-A allocation for professional development on differentiation and best practices for mathematics and English Language Arts by receiving professional development from consultants and by attending workshops.

### **Title III Projects**

Title III funds are used for salaries and supplies.

### **Title III Immigrant Projects**

Title III Immigrant funds are used for salaries and supplies.

### **Title IV-A Projects**

The Highland Park's Title IV-A ESEA allocation is used to purchase the student-centered and choice-driven FUSE curriculum of STEM Challenges. Students choose the challenges they want to work on and progress at their own pace, working alone or with others. Challenges are based in STEAM topics such as 3D design and printing, robotics, architecture, music mixing, animation and more. The district also hires Educational consultants to provide ongoing job-embedded training for teachers and administrators on the incorporation of blended learning and using one-to-one devices. The local nonpublic school uses their equitable share of the Title IV-A allocation for STEM materials.

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**IDEA Projects (Special Education)**

The FY 2019 IDEA funds are being used for staffing and substitutes for extended school year (ESY) classes, child study team summer work on evaluations and case management, out of district tuitions, field trip admission fees and transportation costs for the Community Based Instruction (CBI) group, consultation for behavioral supports, related services, professional development, and instructional supplies for the CBI program. Additionally, preschool funds are used for a classroom aide and non-public funds are used to fund services provided by the New Jersey Commission for the Blind and Visually Impaired.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

The district does not have clear and distinguishable identification criteria for its Title I students, and included students of color and socio-economic status as two of the entrance criteria for the high school. Therefore, ineligible students benefited from services that should have been for the lowest-performing students in the school. In targeted assistance programs, districts must identify and target Title I services to students who are most academically at risk for not attaining proficiency on challenging state academic standards assessments.

**Citation:**

ESEA §1115: *Targeted Assistance Schools*

**Required Action:**

The district must establish clear and distinguishable identification criteria based upon multiple educationally related criteria for its identified Title I students. The district must establish clear and distinguishable identification criteria based solely upon multiple educationally related objective criteria for identifying its Title I students to be served in its Title I funded schools. The district must submit the revised FY 2019-2020 entrance and exit criteria to the NJDOE for review.

**Finding 2:**

The district was unable to provide documentation of a distinct Title I program at the high school. The district is proposing the following programs:

- HS Tutoring-is available to all students on an as needed basis throughout the school year;
- Academic Coaching-coaches will meet with students a minimum of twice per month to discuss grade(s) and strategies for improvement and to help provide support academically, organizationally and emotionally;

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- AP Bootcamp-targets students who are not currently in honors or AP and are earning a C or higher. This program does not support students most academically at risk;
- Video production-a local filmmaker works with students on interviewing skills, editing media skills and research.

**Citation:**

*ESEA §1115: Targeted Assistance Schools*

**Required Action:**

The district must revise its Title I program for students at the high school after conducting a comprehensive needs assessment. Primary consideration should be given to providing extended learning time opportunities such as before-and-after-school and summer programs. The school will need to determine how they will use these funds to service their low-performing students and submit its plan for a Title I program to the NJDOE for review.

**Recommendation:**

The school district's leadership team should reach out to the Office of Supplemental Educational Programs to receive targeted technical assistance regarding designing and implementing Targeted Assistance Programs.

**Finding 3:**

The notification letters sent to the parents/guardians of identified Title I students 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.

**Citation:**

*ESEA §1115: Targeted Assistance Schools; 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'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 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.

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**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 provided limited evidence of convening an annual Title I parent meeting. The documentation provided showed four parents attended a districtwide Title I meeting that did not target parents and families of identified Title I students.

**Citation:**

*ESEA §1116(c)(1): Parent and Family Engagement (Policy Involvement).*

**Required Action:**

The district must ensure that each of 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. Each school must upload documentation of the meetings (e.g., invitational letter/flyer, agenda, meeting minutes, and sign in sheets) as part of the Annual School Plan.

**Finding 6:**

There is no evidence that the school district provides any outreach to engage parents and families of students (including nonpublic) receiving Title 1 services. The district's and individual school's web pages also do not contain required notifications for parent and family engagement. Per the legislative requirement, LEAs must conduct meaningful outreach, programs and activities for all parents and families of Title 1 students.

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**Citation:**

*ESEA §1116(a): Parent and Family Engagement ESEA §1117(a)(1)(b): Participation of Children Enrolled in Private Schools.*

**Required Action:**

For the 2019-2020 school year, the district must ensure that its written parent and family engagement policy is fully distributed to all parents/guardians of its identified Title I students, including those attending non-public schools. The district must also determine how they will engage parents and families of Title I students on the academic performance and achievement of their children.

**Recommendation:**

The district will be provided with a contact from another school district who may be able to assist the district with establishing activities regarding the engagement of parents and families of students. Additionally, the district should review the webinar “parental notification requirements for school districts” on the [NJDOE’s Title I, Part A website](https://www.nj.gov/education/title1/program/parent/): <https://www.nj.gov/education/title1/program/parent/>.

**Finding 7:**

The district’s Title I schools did not provide information regarding the ELL parent notification letter to parents in multiple languages. Schools are required to provide information to parents of participating students in a language that is understandable and in a uniform format and to the extent practicable in a language that the parents understand.

**Citation:**

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

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

**Finding 8:**

The district’s use of Title I funds for a bus to transport two students to freshman orientation at the high school is an unallowable cost.

**Citation:**

*2 CFR §200.403 Cost Principles: Subpart E (Allowability)*

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**Required Action:**

The district must reverse the Title I costs for bussing these students to the high school. The district must provide evidence of the adjusting journal entry to the NJDOE for review.

**Finding 9:**

The district's policy for the Educational Stability for Children in Foster Care includes incorrect information regarding the LEA Point of Contact (POC). The policy states that the LEA POC cannot be the same as the McKinney-Vento liaison. This regulation applies only to the state-level POC. Additionally, the policy does not address the following for children in foster care:

- How the LEA will promptly provide, arrange, and fund transportation for the duration of time a student is in foster care;
- How the LEA will ensure that the processing of tuition reimbursement is conducted in such a way as to avoid any barriers to enrollment;
- How the LEA will ensure immediate enrollment upon receipt of a school notification letter from the Department of Children and Families; and
- How the LEA will ensure immediate records transfers for children in foster care.

**Citation:**

*ESEA §1112 (c): Local Educational Agency Plans (Assurances)*

**Required Action:**

The district must revise its policy for the Educational Stability for Children in Foster Care to include all elements listed above. The district must submit copies of a recent board approved district educational stability policy to the NJDOE for review.

**Finding 10:**

The district did not provide evidence of meaningful and ongoing consultation with nonpublic school officials. The district was also unable to articulate how programs/services will be provided to identified nonpublic students.

**Citation:**

*ESEA §1117: Participation of Children Enrolled in Private Schools*

**Required Action:**

The district must implement and maintain documentation to verify that consultation with nonpublic officials are timely, ongoing and meaningful, covered all appropriate topics, and resulted in program designs that had a reasonable expectation of success.



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**Recommendation:**

The district should review the NJDOE and/or USDE guidance on the provision of equitable services to eligible nonpublic school children at <https://www.nj.gov/education/nonpublic/federal/>.

**Title II-A**

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

**Title III**

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

**Title III Immigrant**

A review of the expenditures charged to the Title III immigrant grant yielded no findings.

**Title IV-A**

A review of the expenditures charged to the Title IV-A grant yielded no findings.

**IDEA (Special Education)**

**Finding 1:**

The district did not consistently document in the IEPs of students removed from the general education setting for more than twenty percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment (LRE).

Specifically, IEPs did not consistently include:

- supplementary aids and services considered and an explanation of why the supplementary aids and services were rejected;
- the comparison of the benefits provided in the general education class and the benefits provided in the special education class;
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class; and
- for students in a separate setting (for all or part of a school day), the district did not consistently set forth activities necessary to move the student to a less restrictive placement.

**Citation:**

N.J.A.C. 6A:14-4.2 (a) 8(i), (ii) and (iii), N.J.A.C. 6A:14-4.2 (a) 4

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**Required Action:**

The district must ensure that when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than twenty percent of the school day. The district must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct a visit to interview staff, review the revised IEPs, a random sample of additional IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant were provided to the district by the special education monitor.

**Finding 2:**

The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for speech-language services.

**Citation:**

N.J.A.C. 6A: 14-3.8(a)

**Required Action:**

The district must ensure reevaluations are conducted within required timelines with required participants in attendance. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review documentation of eligibility meetings held as part of the reevaluation process between December 2020 and March 2021, and review the oversight procedures.

**Finding 3:**

The district did not consistently ensure that required participants, specifically general education teachers, were in attendance at meetings for students eligible for speech-language services.

**Citation:**

N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a)

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**Required Action:**

The district must ensure that meetings are conducted with required participants, specifically general education teachers, and that documentation of attendance is maintained in student files. In addition, the district must ensure that written parental consent to excuse general education teachers is obtained and that documentation of the excusal is maintained in student files. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff and review meeting documentation for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Administrative**

**Recommendation 1:**

The school does not have a purchasing manual that details procedures for the procurement of goods and services.

**Citation:**

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

**Recommended 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 (609) 376-3593 or via email at [steven.hoffmann@doe.nj.gov](mailto:steven.hoffmann@doe.nj.gov).