

**State of New Jersey  
Department of Education  
PO Box 500  
Trenton, NJ 08625-0500**

**Trenton Public School District**  
108 North Clinton Avenue  
Trenton, NJ 08609  
Phone: (609) 656-4900



*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2020

**District:** Trenton Public School District  
**County:** Mercer  
**Dates On-Site:** January 14, 15 and 16, 2020  
**Case #:** CM-021-20

**Funding Sources**

---

Program	Funding Award
Title I, Part A	\$6,401,201
IDEA Basic	4,269,476
IDEA Preschool	91,699
Title II, Part A	833,089
Title III	750,215
Title III Immigrant	158,281
Title IV, Part A	585,731
Carl D. Perkins	246,340
Total Funds	<u>\$13,336,032</u>

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Background**

---

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**

---

The NJDOE visited the Trenton Public 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); Carl D. Perkins Grant, and IDEA Basic and Preschool for the period July 1, 2019 through December 31, 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**

---

The grants reviewed included Title I, Title II, Title III, Title III Immigrant, Title IV, Carl D. Perkins and IDEA Basic and Preschool from July 1, 2019 through December 31, 2019. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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

---

**Title I Projects**

During the 2019-2020 school year, the district identified the following needs to be addressed with Title I, Part A funds: 1) Strengthening educational outcomes in mathematics for all students 2) Strengthening educational outcomes in English language arts for all students; 3) Decreasing

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

chronic absenteeism in all grade levels; and 4) Increasing vocabulary skills and strong academic language for English learners (ELs).

As listed in the FY 2020 Elementary and Secondary Education Act (ESEA) Consolidated Subgrant Application, the district operates Title I schoolwide programs in seventeen (17) of its twenty (20) Title I-funded schools, which are: Gregory Elementary School, Martin Luther King Jr. Elementary School; Grant Elementary School; Luis Munoz-Rivera Elementary School; Columbus Elementary School; Parker Elementary School; Mott Elementary School; Joyce Kilmer Elementary School; Washington Elementary School; Robbins Elementary School; Franklin Elementary School; P.J. Hill Elementary School; Wilson Elementary School; Grace A. Dunn Middle School; Hedgepeth-Williams Middle School; Trenton Central High School; and Daylight/Twilight High School. The three (3) remaining Title I-funded schools listed as operating Title I targeted assistance programs, are Monument; Harrison Elementary School; and Trenton Central High School – 9<sup>th</sup> Grade Academy.

**Please Note:** District staff provided information on changes in grade configurations, school names and new school openings, as well as information to verify that the students attending the three (3) targeted assistance schools came from school attendance centers, previously designated as Title I schoolwide programs. Given this information, as well as a review of NJDOE records, the Title I monitor will work with staff from the Office of Grants Management (OGM) to update each school’s designation to schoolwide (SW), in the district’s FY 2020 ESEA Consolidated Subgrant Application. Within 30 days of notification by the NJDOE of the schoolwide program status change, each of the three (3) above referenced schools must complete and submit its Annual School Plan (ASP) via the ASPSP link in [NJ Homeroom](#).

**Overarching Recommendation:**

It is recommended the district ensure all references to No Child Left Behind (NCLB) are removed and replaced with the Elementary and Secondary Education Act (ESEA), as this pertains to all posted information on the district’s website.

**Title II-A Projects**

The Trenton School District uses their Title II-A ESEA allocation for professional development to support programs such as *Generation Ready*, an instructional framework of job-embedded coaches offering support to teachers in math and literacy, professional development to support teachers with teaching science and collaborating with the Carver Foundation to develop a College & Career culture to inform teachers how to help students identify and pursue college and career opportunities.

**Title III Projects**

Title III funds were used for salaries, professional development, parent programs, and materials and supplies.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Title III Immigrant Projects**

Title III Immigrant funds were used for supplies and materials.

**Title IV-A Projects**

The Trenton School District uses their Title IV-A ESEA allocation for:

- Activities to support well-rounded students that include a pilot college readiness program for the ninth grade academy to help prepare students for postsecondary opportunities; expansion of the National Inventors Hall of Fame programs and First Legos programs to multiple schools; STEM invention kits, software licenses, student lab materials, and afterschool coding clubs to increase girls' interest in STEM; and collaborating with a local organization to support the creative and intellectual growth of Trenton Public School students by focusing on the arts education curricula.
- Activities to support safe and healthy students which include mentoring student athletes to help them manage academic programs and athletic commitments; providing job-embedded coaching and other forms of support and training for school leaders, counselors and school leadership teams on mindfulness and social, emotional learning; an afterschool curriculum that includes mindfulness restorative practice programs to promote and encourages positive social behaviors; and an afterschool wellness program with events that focus on healthy eating, healthy lifestyles, and an increase in physical activity education, and
- Activities to support the effective use of technology funds for professional development in order to build a core group of expert staff to use Google Education Suites throughout the district.

**IDEA Grant**

The FY 2020 IDEA funds are being used to reduce district tuition expenditures for students receiving special education services in approved private schools for students with disabilities and are also being used for professional development, instructional supplies and materials for staff members supporting students with disabilities. Funds are also being used for instructional supplies for students with disabilities. Additionally, IDEA funds are being expended to support students in the general education setting through Coordinated Early Intervening Services (CEIS).

**Carl D. Perkins Projects**

The district has the following Career and Technical Education (CTE) programs: Photographic/Film/Video Technology (100201); Cosmetology (120401); Cooking/Culinary Arts (120500); Physical Fitness Technician (310507); Construction Trades (460000); Health Service/Allied Health (510000); Nursing Assistant (513902); Finance (520801); and Sales/Marketing (521801). Perkins funds are used to provide stipends for CTE teachers and

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

instructional material for use in programs. Perkins funds are also used to provide PD to CTE teachers and to purchase consumable office supplies in connection with programs administration.

## **Detailed Findings and Recommendations**

---

### **Title I**

#### **Finding 1:**

In general, the Title I Annual School Plans (ASPs) for each Title I schoolwide program school did not address all essential components articulated in the Title I, Part A legislation. Of significant note were the following omissions:

1. A lack of documentation to certify that the comprehensive needs assessment process, plan development and plan evaluation were conducted through the involvement of all relevant stakeholders, especially parents/families and community members, during the entire school year (i.e., *as submitted, ALL Annual School Plans (ASPs) were completed during the months of April – June 2019*); and
2. A lack of budget detail to show how all applicable funds (i.e., *state/local; Title I Intervention Reservation; Title I School Allocation; Title I Reallocated Allocation; Other Federal Allocations; and School Improvement*) are budgeted for programs and/or services outlined in each ASP).

#### **Citation:**

34 CFR 200.25: *Improving Basic Programs Operated by Local Educational Agencies (Schoolwide programs in general)*; ESEA §1114(b)(2): *Schoolwide Programs (Components of a Schoolwide Program – Plan)*

#### **Required Action:**

The district must establish processes to ensure the Annual School Plans (ASPs) for ALL applicable schools are completed and submitted in their entirety, developed with the involvement of all relevant stakeholder group representatives throughout the school year, and include budget details that show how ALL applicable funds are budgeted to support the identified programs and/or services.

#### **Finding 2:**

As written, the district's parental and family engagement policy included only the ESEA legislative requirements for such engagement. This policy does not establish or describe the district's expectations and objectives for meaningful parental and family engagement.

#### **Citation:**

ESEA §1116(a)(2): *Parent and Family Engagement*

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must revise its district-level parental and family engagement policy to include specific details on how it will meaningfully and actively engage parents and families in their children’s academic programs.

**Finding 3:**

The district was unable to provide evidence that the Title I parent-school compact was distributed to parents and families at Trenton Central High School. In addition, the district was unable to provide evidence that the annual Title I meeting was held at this school. All Title I-funded schools must have a mechanism to ensure parents and families are informed of the roles and responsibilities of the school, parents and families and students in achieving academic success. The exclusion of parents and families in the development of the parent-school compact and annual Title I meeting resulted in these stakeholders being excluded from active participation in their children’s educational programs in Trenton Central High School.

**Citation:**

ESEA §1116(c) and (d): *Policy Involvement and Shared Responsibilities for High Student Academic Achievement*

**Required Action:**

Within thirty (30) business days of receipt of the Collaborative Monitoring Report the district must distribute the parent-school compact for Trenton Central High School, as well as ensure the school holds its annual Title I Meeting.

**Finding 4:**

Traditionally, the district uses Title I funds for one-time events during the year to bring together parents and children. From the evidence presented by the district, it appears these individual, one-time events do not meaningfully engage parents and children “by connecting” the events to the academic programs being implemented in district schools.

**Citation:**

ESEA §1116(c): *Policy Involvement*

**Required Action:**

The district must establish processes to ensure the involvement of parents and families in an organized, ongoing, timely and, therefore, meaningful way in their children’s academic programs. These processes must articulate the ways in which all parental and family engagement activities include goals and objectives that connect the specific activity to the district’s academic programs.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Finding 5:**

The district's contract with a third-party provider for services to participating eligible nonpublic resident students did not articulate the following information: pupil economic eligibility status and pupil selection/identification criteria.

**Citation:**

ESEA §1117(b)(1) (E and F): *Participation of Children Enrolled in Private Schools (Consultation)*

**Required Action:**

The district must ensure its contract, with a third-party provider for equitable services to resident nonpublic school students, reflects the following 1) student eligibility date 2) the way(s) in which the needs of the Title I eligible children were identified 3) the services that will be provided to eligible students from Trenton 4) how, where, and by whom the services will be provided and 5) the way(s) in which services will be assessed and used to enhance/modify services provided in the future. Within 30 business days of receipt of the Collaborative Monitoring Report, the district must submit verification of the above information to the Office of Supplemental Educational Programs for review and feedback.

**Finding 6:**

The district did not provide documentation to verify that consultation with nonpublic school officials began at a sufficient time prior to the beginning of the FY 2020 ESEA project period. In addition, it appears that historically reaching, agreement between the public and nonpublic school officials on how to provide equitable and effective programs for eligible resident nonpublic school students does not occur during consultation. Rather, nonpublic school officials submit requests during the school year regarding the provisions of programs/services specified by them.

**Citation:**

ESEA §1117(b)(1) (A-L): *Participation of Children Enrolled in Private Schools*

**Required Action:**

1. The district must establish written processes for its Title I, Part A program, to outline the following:
2. The steps the district will take to ensure nonpublic school consultation for a given project year begins no later than March of the previous year;
3. The responsibilities of both the public school and nonpublic school officials in agreeing to the provision of specific programs/services occurs prior to the end of the consultation process; and

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

4. The uniform utilization of the Nonpublic Affirmation of Consultation and Nonpublic School Participation Refusal forms found on the NJDOE website at [Consultation Toolkit](#).

**Recommended Action:**

To enhance the nonpublic school consultation process the district should consider providing a needs assessment template to the nonpublic school officials to ensure: 1) the needs of resident nonpublic school students are identified; 2) agreement occurs regarding the types of programs/services that will be implemented to address the identified needs. An example can be accessed at [ESEA - Nonpublic Schools Planning Template](#).

**Finding 7:**

The district did not provide evidence to verify that Title I-funded services for eligible nonpublic resident students was provided in a timely manner. Based on the provided documentation, the equitable services for the eligible nonpublic resident students did not begin until November 2019.

**Citation:**

ESEA §1117(a)(3)(A): *Participation of Children Enrolled in Private Schools (Equity)*

**Required Action:**

The district must establish processes to ensure that the provision of equitable services to resident nonpublic school students, staff, and parents/families begins at the same time as programs/services begin for public school students.

**Finding 8:**

The district was unable to provide documentation of how expenditures from its Title I reserve for homeless students was tracked and what actual services were provided, as well as the time frame in which these services occurred.

**Citation:**

The McKinney-Vento Act §722(g)(1)(I)(ii): *Grants for state and local activities for the education of homeless children and youths (State plan)*. ESEA §1115(b)(2)(E): *Targeted Assistance Schools (Eligible Children – Homeless Children)*. ESEA §1113(c)(3)(A): *Eligible School Attendance Areas (Allocations – Reservation)*.

**Required Action:**

The district must document the service(s) provided to students experiencing homelessness using funds from the Homeless reserve as articulated in the district's FY 2020 ESEA Consolidated Subgrant Application, as well as how expenditures from this reserve are tracked. Within thirty (30) business days of receipt of the Collaborative



**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

Monitoring Report, the district must submit this documentation to the Office of Supplemental Educational Programs for review and feedback.

**Finding 9:**

As articulated in the district's FY 2020 ESEA Consolidated Subgrant Application, the Needs Assessment indicated Title I funds would be used to address the following identified need:

- Enhanced instructional services to English Learning Students

Unfortunately, the selected allowable uses and budgeted costs did not align with the above referenced identified need. Without a direct connection among identified need(s), selected allowable uses and budgeted costs, there is no evidence that implemented programs/services are necessary and reasonable for the proper and efficient performance and administration of the district's Title I-funded programs.

**Citation:**

ESEA §1112 *Local Educational Agency Plans*; 2 CFR §200.404 *Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)*

**Required Action:**

The district must: 1) revise its comprehensive needs assessment in its FY 2020 ESEA Consolidated Subgrant Application to eliminate this identified need or 2) revise its Title I program plan and budget to include selected allowable uses and budgeted costs that tie directly to this identified need.

**Finding 10:**

The district did not provide evidence of district-level policies and procedures regarding the Educational Stability of Children in Foster Care. The district did not provide evidence that a staff person had been designated as the Foster Care liaison.

**Citation:**

ESEA §1111; §1112 *Educational Stability for Children in Foster Care*

**Required Action:**

The district must establish policies and procedures regarding the Educational Stability of Children in Foster Care, designate a staff person as the Foster Care liaison, and post this information on its website.

**Recommended Action:**

The district is encouraged to access the NJDOE website [Educational Stability for Children in Foster Care](#) for specific information regarding the establishment of its

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

Educational Stability policies and procedures, as well as the responsibilities of the district Foster Care liaison.

**Finding 11:**

The district did not provide evidence regarding the processes/procedures to address the following military or college recruiter requirements:

- Method(s) of distribution of the Military Opt-Out form to parents and their children
- Process(es) for maintaining a record of parents and students who requested to opt-out
- Verification process/system to show students' information was sent to military or college recruiters when requested.

**Citation:**

ESEA §8528 *Armed Forces Recruiter Access to Students and Student Recruiting Information*

**Required Action:**

The district must establish specific processes to ensure it meets all military or college recruiters' requirements as articulated in ESEA.

**Finding 12:**

The district was unable to provide evidence to verify that 100% of its instructional paraprofessionals met highly qualified requirements.

**Citation:**

ESEA §1111(g)(2)(M) *Other Plan Provisions: Assurances*; 34 CFR §200.58 (*Qualifications of Paraprofessionals*)

**Required Action:**

Within thirty (30) business days of receipt of the Collaborative Monitoring Report, the district must submit a list of all instructional paraprofessionals in each Title I-funded school, which includes the first and last initial of each paraprofessional, as well as the qualifications of each paraprofessional, to the Office of Supplemental Educational Programs for review and feedback.

**Title II-A Programs**

**Finding 1:**

The Trenton School District received a Title II-A allocation of \$833,089 and as of the monitoring visit had only requested \$84,739. The district must request timely reimbursement to make the appropriate payment to contractors in accordance with the contract provisions.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Citation:**

2 CFR-200.303: *Internal Controls*

2 CFR 200.305: *Payment*

**Required Action:**

The district must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the district is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). The district will provide evidence of payments and internal control documentation that indicates the frequency of when reimbursement requests will be submitted.

**Finding 2:**

The Trenton School District is required to engage in ongoing consultation with stakeholders to improve the local activities in order to meet the purpose of Title II, Part A and to coordinate such implementation with other related strategies, programs and activities being conducted in the community.

**Citation:**

*ESEA §2102(b)(3)(A-C)*

**Required Action:**

The district must provide a list of meeting dates and an agenda of stakeholder meeting dates for the remainder of this school year and planned dates for the 2020-2021 school year. If any meetings have taken place by the time of the follow-up visit, sign-in sheets must be provided and include a summary of survey results if applicable.

**Title III**

**Finding 1:**

The district did not use Title III funds in a supplemental manner when it funded sheltered instruction professional development and purchasing the Wilson Reading Program for bilingual classes.

**Citation:**

ESEA 3115(g)

**Required Action:**

The district must fund this training with state and local funds.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Finding 2:**

The district provided food at parent advisory committee meetings that were not reasonable and allocable.

**Citation:**

2CFR 200

**Required Action:**

The district can only provide light meals and refreshments that are reasonable costs.

**Title III Immigrant**

**Finding 1:**

The district was unable to provide an accurate list of immigrant students by country of birth, district enrollment date and date of first enrollment in a U.S. school.

**Citation:**

ESEA 3115(g)

**Required Action:**

The district must provide an accurate list of immigrant students who were included to generate Title III immigrant funds to ensure they were appropriately counted.

**Title IV-A Programs**

**Finding 1:**

The District received an allocation of \$585,731 and as of the on-site monitoring visit had not requested any reimbursement.

**Citation:**

2 CFR-200.303: *Internal Controls*

2 CFR 200.305: *Payment*

**Required Action:**

The district must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the district is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). The district will provide evidence of payments and internal control documentation that indicates the frequency of when reimbursement requests will be submitted.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Finding 2:**

Districts that receive a Title IV-A program allocation of at least \$30,000 must conduct a comprehensive needs assessment prior to receiving its allocation. A subsequent needs assessment to examine its needs for improvement of the activities must be conducted at least once every three years.

**Citation:**

*ESEA §4106(d): Needs Assessment*

**Required Action:**

The district must create a Comprehensive Needs Assessment in collaboration with stakeholders. If the district consults with stakeholders and concludes that some or all Title IV, Part A funds should be transferred to another title, the Needs Assessment must reflect the reason for transferring the funds. The *National Center on Safe Supportive Learning Environments* has created a free [Title IV, Part A Needs Assessment Tool](https://safesupportivelearning.ed.gov/title-iv-part-lea-needs-assessment-tool) for districts and schools that wish to use it. The tool can be found at: <https://safesupportivelearning.ed.gov/title-iv-part-lea-needs-assessment-tool>.

**Finding 3:**

The local educational agency, or consortium of such agencies, shall engage in continuous consultation with the stakeholder entities to improve the local activities in order to meet the purpose of Title IV, Part A and to coordinate such implementation with other related strategies, programs and activities being conducted in the community. Students are required to participate in the discussions and decisions regarding the use of the Title IV, Part A funds.

**Citation:**

*ESEA §4106(c)(1-2): Consultation*

**Required Action:**

The district must provide a list of meeting dates and an agenda of stakeholder meeting dates for the remainder of this school year and planned dates for the 2020-2021 school year. If any meetings have taken place by the time of the follow-up visit, sign-in sheets must be provided. Include a summary of survey results if applicable.

**IDEA Program**

**Finding 1:**

The district did not consistently maintain documentation of the frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS) process.

**Citation:**

N.J.A.C. 6A:14-3.3(c)

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must ensure that interventions are provided in the general education setting for students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. In addition, the district must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner that the team identifies and maintains documentation of the frequency, duration and effectiveness of the interventions. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff and develop an oversight mechanism to ensure compliance with requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview I&RS team members and teachers and review documentation for students who were provided interventions in general education between December 2020 and March 2021, and review the oversight procedures.

**Finding 2:**

The district did not consistently provide parents of students eligible for special education and related services notice of a meeting.

**Citation:**

N.J.A.C. 6A:14-2.3(k)

**Required Action:**

The district must provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have an opportunity to attend. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review meeting documentation for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 3**

The district did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation to determine if an evaluation was warranted.

**Citation:**

N.J.A.C. 6A:14-3.3(e)

**Required Action:**

The district must ensure that identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are in attendance. 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 citation listed above. A monitor from the

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

NJDOE will conduct a site visit to interview staff, review documentation from meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 4:**

The district did not consistently conduct vision and hearing screenings and health summaries for students referred for an initial evaluation to the child study team.

**Citation:**

N.J.A.C 6A:14-3.4(j)

**Required Action:**

The district must ensure that upon receipt of a written referral to the child study team, the school nurse shall review and summarize available health and medical information regarding the student and shall transmit the summary to the child study team for the identification meeting. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review documentation from meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 5:**

The district did not consistently ensure that the required participants were in attendance at the annual review, reevaluation planning, eligibility and IEP team meetings for students eligible for speech language services and for students eligible for special education and related services. Specifically, the district did not consistently document the attendance and participation of general education teachers and special education teachers. Additionally, the district did not consistently ensure that the full child study team was in attendance at identification meetings for students referred for special education and related services.

**Citation:**

N.J.A.C. 6A:14-2.3(k)1(i-vii)

**Required Action:**

The district must ensure that meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student files. In order to demonstrate correction of noncompliance the district must conduct training for child study team members and 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

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

visit to interview staff and review meeting documentation for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 6:**

The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services.

**Citation:**

N.J.A.C. 6A:14-3.4(f)4

**Required Action:**

The district must ensure that all components of the functional assessment are conducted as part of the initial evaluation process. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review initial evaluation reports completed between December 2020 and March 2021, and review the oversight procedures.

**Finding 7:**

The district did not consistently ensure that the initial evaluation consisted of a minimum of two assessments conducted by members of the child study team and were used to determine eligibility for special education and related services.

**Citation:**

N.J.A.C. 6A:14-2.5(b)6

**Required Action:**

The district must ensure that a minimum of two members of the child study team conduct evaluations when determining eligibility as part of an initial evaluation. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review initial evaluation reports completed between December 2020 and March 2021, and review the oversight procedures.

**Finding 8:**

The district did not consistently conduct all assessments for which written parental consent was obtained during initial evaluation and reevaluation planning meetings for students referred and/or eligible for special education and related services.

**Citation:**

N.J.A.C. 6A:14-2.3(a)



**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must ensure that all assessments for which parental consent to conduct was obtained are completed and used to determine eligibility for special education and related services. 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 requirement in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review evaluation reports for students evaluated between December 2020 and March 2021, and review the oversight procedures.

**Finding 9:**

The district did not consistently provide copies of evaluation reports to parents at least 10 business days prior to the determination of initial eligibility or continued eligibility for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**Citation:**

N.J.A.C. 6A:14-3.5(a)

**Required Action:**

The district must ensure parents are provided copies of evaluation reports not less than 10 business days prior to the determination of eligibility. In order to demonstrate correction of noncompliance the district must provide training for child study team members and 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 evidence that evaluation reports have been provided to parents for students evaluated between December 2020 and March 2021, and review the oversight procedures.

**Finding 10:**

The district did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

**Citation:**

N.J.A.C. 6A:14-2.3(k)2x

**Required Action:**

The district must ensure that each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review copies of invitations to IEP meetings to

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

students age 14 and above for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 11:**

The district did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP. Specifically, the district did not consistently include a statement of the student's strengths, interests and preferences in the IEP.

**Citation:**

N.J.A.C. 6A:14-3.7(e)11

**Required Action:**

The district must ensure that transition is discussed at each IEP meeting for students age 14 or above, and that decisions are documented in the 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 citation 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 site visit to interview staff, review a random sample of IEPs developed between December 2020 and March 2021, and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

**Finding 12:**

The district did not consistently document in the IEPs of students removed from the general education setting for more than twenty (20) 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:

- the supplementary aids and services considered and an explanation of why the supplementary aids and services were rejected;
- a 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 those students placed in separate settings, activities to transition the student to a less restrictive environment.

**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

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**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 placement are documented in the IEP for each student removed from general education class for more than twenty (20) 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 citation 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 those specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct a visit to interview staff, review the revised IEPs, review a random sample of additional IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant were provided to the district by the special education monitor.

**Finding 13:**

The district did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related services and 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. In order to demonstrate correction of noncompliance the district must conduct training for child study team members and 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 14:**

The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services. Specifically, IEPs did not consistently include a statement of how the student's disability affects his or her involvement and progress in the general curriculum.

**Citation:**

N.J.A.C. 6A:14-3.7(e)1i

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must ensure that each IEP contains all required components. 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 citation 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 those students whose IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct a site visit to interview staff, review the revised IEPs, along with IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

**IDEA Program Recommendations**

The district is operating two Life Skills classes at the secondary level. The district anticipated the programming needs of these students when designing the newly opened high school by including two fully equipped Life Skills classroom in the building. For the 2019-2020 school year one classroom is located within the high school and the other classroom is housed at the Daylight/Twilight building. The second classroom at the high school remains unoccupied. Students are placed in the programs randomly. The monitors observed a great disparity in the resources provided at the two classrooms. The classroom at Daylight/Twilight does not contain the same resources and instructional opportunities that are afforded students placed at the high school. It is strongly recommended that the district relocate the Life Skills classroom at Daylight/Twilight to the dedicated Life Skills classroom at the high school.

**Carl D. Perkins**

**Finding 1:**

The district does not have a current signed articulation agreement for Cooking and Related Culinary Arts, General (CIP 120500) program of study and Health Services/Allied Health/Health Sciences, General (CIP 510000) program of study.

To be eligible for Perkins funding the district must have at least one Career and Technical Education program of study. The district is not eligible for FY20 Perkins funds until a current articulation agreement, that has been signed and dated, is on file for this program. The articulation agreement must be updated annually and must be effective throughout the program year for which the grantee seeks Perkins funding.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Citation:**

Perkins Act § 135 (b)(1-9): Local uses of funds (Requirements for uses of funds) and 122 (c)(1)(A) and (C): State Plan (Plan contents) and FY2020 Perkins Guidelines, Revised May 18, 2018, (Section 3, page 7)

**Required Action:**

The district must ensure that they have a current signed and dated articulation agreement on file for all approved CTE programs of study. The articulation agreement must be signed annually by the district superintendent and college president.

**Finding 2:**

The district did not have evidence for FY2020 of no longer continuing to operate approved Career Readiness and Technical Education Programs of the following:

- Nursing Assistant/Aide and Patient Care Assistant Aide program (CIP 513902);
- Electrician program (CIP 460302);
- Physical Fitness Technician program (CIP310507).

**Citation:**

Perkins Act § 135 (b)(1-9): Local uses of funds (Requirements for uses of funds) and 122 (c)(1)(A) and (C): State Plan (Plan contents) and FY20 Perkins Guidelines, Revised May 18, 2018, (Section 3, page 7).

**Required Action:**

For the FY 2020, the district must submit in *CTE Career and Technical Education Data Management System (CTE DMS)*, deletion requests of no longer operating a CTE program(s) or program(s) of study. The district must follow-up with a letter to district's program officer in the Office of Career Readiness.

**Finding 3:**

The district did not provide sufficient evidence in the integration of approved academics with CTE programs through a coherent sequence of courses, course curricula or syllabi for CTE programs and/or programs of study such as; missing course curricula and board approval dates; missing CTE standards (i.e. Digital arts; Digital Arts/Animation Studio; Speech & Broadcasting/Audio production; Video production II; Photography curriculum; Animation; Construction; and Culinary.

**Citation:**

Perkins Act § 135(b)I-9: *Perkins Act §135(b)1-9: Local Uses of Funds (Requirements for Uses of Funds*

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must review all course curricula, syllabi for each CTE program and programs of study to ensure alignment of integration of approved academics with CTE programs through a coherent sequence of courses of each CTE program and/or program of study. The district also must contact its program officer and career cluster lead for technical assistance. Lastly, the district must provide evidence of board approval of curriculum and submit documentation to the district's program officer in the Office of Career Readiness.

**Finding 4:**

The district did not provide evidence of opportunities for participation in structured learning experiences (SLE) for all students enrolled in approved CTE programs.

**Citation:**

*Perkins Act §135(b)1-9: Local Uses of Funds (Requirements for Uses of Funds); and N.J.A.C. 6A:19-4: Structured Learning Experiences.*

**Required Action:**

The district must offer students enrolled in Career and Technical Education programs opportunities to explore all aspects of their career programs through participation in structured learning experiences linked to the New Jersey Student Learning Standards in all approved CTE programs. The district must contact its Perkins program officer for technical assistance.

**Finding 5:**

The district did not provide evidence of student performance data analysis and proof of conducting evaluations of CTE programs and review of CTE student performance data annually.

**Citation:**

*Perkins Act §135(b) (1-9): Local Uses of Funds (Requirements for Uses of Funds).*

**Required Action:**

The district must ensure that program data is reviewed annually and CTE program performance is also evaluated annually, based on the review of relevant CTE program data. Evidence that a review and evaluation was conducted must be maintained by the district for monitoring purposes.

**Finding 6:**

The district did not consistently provide evidence that materials and/or procedures to increase and support nontraditional student participation were developed and implemented.

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Citation:**

*Perkins Act §135(b) 1-9: Local Use of Funds (Requirements for Use of Funds)*

**Required Action:**

The district must conduct activities or implement strategies to increase participation and success of nontraditional students and other special population students in CTE programs. The district is advised to contact its Perkins Program officer for resources and assistance with developing appropriate strategies.

**Finding 7:**

The district did not have evidence that advisory boards were established and actively operating with appropriate membership affiliations for each of their approved CTE programs.

**Citation:**

*Perkins Act §134(b)(5): Local plan for career and technical education; program (Contents). N.J.A.C. 6A:19-3.1: Development, Approval, and Delivery of Career and Technical Education Program requirements.*

**Required Action:**

The district must ensure there are at least two advisory board meetings held each project period for all approved CTE programs. The advisory boards must include the required membership as indicated in the New Jersey Administrative Code listed above. The district must maintain sufficient evidence that the meetings took place, including sign in sheets with the name and signature of those in attendance at the meeting indicating the name, organizational affiliation of each member in attendance. Once the advisory boards have been established the district must submit a copy of the advisory board minutes and sign in sheets to their Perkins program officer. Programs without evidence of a functioning advisory board will not be considered approved programs.

**Finding 8:**

The district did not provide evidence that the school district submitted CTE program(s) or program(s) of study information relating to the one-year funding application to the Workforce Development Board (WDB).

**Citation:**

*Perkins Act §134(b)(5) Local plan for career and technical program (Content. Perkins One-Year Grant Application Guidelines, July 01, 2019 – June 30, 2020 (Perkins Guidelines), Section 5.3: Workforce Development Board (WDB).*

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must provide to the appropriate WDB a copy of the completed one-year grant application and spending plan for review/comment.

**Finding 9:**

The district did not provide evidence that professional development related career and technical education was provided for all CTE teachers.

**Citation:**

*Perkins Act § 134(b)4 and Perkins § 135(b)5*

**Required Action:**

The district must create opportunities for all CTE teachers to receive professional development specifically related to career and technical education. The district must ensure that completed sign-in sheets, as well as agendas are maintained for professional development activities supported by Perkins grant funds.

**Finding 10:**

The district did not provide evidence of a copy of the CTE safety and health plan. All district boards of education operating Career and Technical Education (CTE) programs shall develop and implement a written CTE safety and health plan.

**Citation:**

N.J.A.C. 6A:19-6.4

**Required Action:**

The district board of education must organize, adopt and implement a written career technical education safety and health plan for operating each approved career and technical education program and program of study. The plan should describe the safety and health policies and practices being used in the district to protect students and staff from safety and health risks on and offsite. Please forward to the district's program officer in the Office of Career Readiness, a memo from the district chief school administrator confirming that the career and technical education health and safety plan was adopted and approved by the district board of education.

**Overall Citation:**

In accordance with *EDGAR, 34 CFR § 76.700: Compliance with statutes, regulations, State plan and applications, sub-grantees, such as Trenton Public School District are required to comply with the state plan and applicable statutes, regulations, and approved applications, and to use federal funds in accordance with those statutes, regulations, plan and applications.*



**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The district must implement procedures to ensure personnel assigned to administer the Perkins grant comply with the program specific requirements applicable to each project period. The district must submit a description of its internal controls process to the NJDOE for review.

**Recommended Action:**

The district should take advantage of technical assistance provided throughout the year, by the Office of Career Readiness. For technical assistance, the district should contact its program officer in the Office of Career Readiness.

**Administrative**

**Finding 1:**

The monitors noted that through January 14, 2020 the district had expended little of their Federal funding for FY 2019/2020. The following is a summary of the year to date expenditures.

<b>Award</b>	<b>Total Allocation</b>	<b>Expended To January 14, 2020</b>	<b>Percent Expended</b>
Title I (Non-blended)	\$1,494,355	\$102,488	7%
Title II	\$833,089	\$184,426	22%
Title III	\$750,215	\$42,881	6%
Title III Immigrant	\$158,281	\$13,559	9%
Title IV	\$585,731	\$0	0%
Perkins	\$246,340	\$10,385	4%

Failure to expend additional funds in accordance with the approved grant applications could result in the permanent loss of Federal funds.

On November 25, 2019, the district issued a memorandum to district administrators and principals with the subject line: ‘Purchasing Freeze.’ Details in this memorandum included the following information: *“Purchases with grant funds may continue to be processed until January 31, 2020. The processing of grant funds cutoff date is firm as the items need to be received to ensure that our students receive the benefit of the purchase.”*

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Citation:**

2 CFR §200.302, *Financial Management*; 2 CFR §200.303 *Internal Controls*

**Required Action:**

The district must establish, maintain and implement effective internal controls over the Federal award to provide reasonable assurance that the district is managing the Federal award in compliance with **ALL** Federal statutes, regulations and terms and conditions of the Federal award. Given the fact the FY 2020 ESEA project period is 7/1/19 – 9/30/20, the district cannot implement policies that prevent purchases with grant funds after January 31, 2020, especially with eight (8) months remaining in the FY 2020 ESEA project period. The district must implement policies to ensure the processing of grant funds occurs until at least March 31, 2020.

**Recommended Action:**

In order to avoid the potential loss of funds, where possible, the district should identify and charge appropriate expenditures to these grants by the end of their respective project period. The district must also implement internal controls to provide assurance that necessary internal controls are in place to prevent future lapsed funds in all program areas. The district should consider providing district administrators and principals with additional and continual training focused on the ‘purchase order life cycle.’

**Finding 2:**

Certain board approved policies and standard operating procedures maintained by the district were not compliant with Federal regulations or were out-of-date and in need of revision.

**Citation:**

Uniform Grant Guidance, 2 C.F.R. § 200.303 and N.J.A.C. 6A:23A-6.6

**Required Action:**

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

**Finding 3:**

The district did maintain time and activity records, however, they did not comply with all required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with federal funds must complete a semi-annual certification attesting to their performance of related duties and employees with less than one hundred (100) percent of their salary paid with federal funds must complete monthly personal activity reports.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302

**Trenton Public School District  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

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

**Finding 4:**

The district budgeted Title I, Part A, Title II, Part A, and Title III, funds for the provision of ‘light meals and refreshments’ for various programs under each title. These budgeted costs, however, did not align with federal and state requirements for ‘light meals and miscellaneous refreshments,’ nor follow the district’s own Standard Operating Procedures Manual, that defined by listed costs, what constitutes ‘light meals and refreshments’: *Breakfast at \$7.00; Lunch at \$10.00; and Dinner at \$15.00*. As an example, the district reserved a total of \$62,460 as its 1% LEA Parent and Family Engagement Required Reserve. Of this amount, \$46,695 of Title I, Part A funding was budgeted for ‘miscellaneous refreshments.’ The budgeted amount of \$46,695 represents 75% of the total 1% Required Reserve, which is excessive in nature and does not represent a reasonable and necessary cost.

**Citation:**

2 CFR §200.404 *Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)*;  
N.J.A.C. 6A:23A-5.8 *District Board of education Expenditures for Non-Employee Activities, Meals, and Refreshments*

**Required Action:**

The district must review and revise the budgeted costs for ‘light meals and refreshments’ for Title I, Part A, Title II, Part A, and Title III, to ensure all costs for ‘light meals and miscellaneous refreshments’ adhere to the requirements set forth in the above listed citations, as well as the information contained in the district’s Standard Operating Procedures Manual with regard to ‘light meals and refreshments.’

**Recommended Action:**

The district should consider providing technical assistance/training to all applicable district staff regarding what food items constitute ‘light meals and miscellaneous refreshments’ for all ESEA grant programs (i.e., Title I, Part A; Title II, Part A; Title III, and Title IV, Part A).

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).