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Pennsauken Township School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
March 2021

District: Pennsauken Township School District
County: Camden
Dates Monitored: January 26, 27 and 28, 2021
Case #: CM-04-21

Funding Sources

Program	Funding Award
Title I, Part A	\$1,727,503
Title I SIA	85,200
Title II	260,548
Title III	78,894
Title III Immigrant	16,727
Title IV	161,029
IDEA Basic	1,691,530
IDEA Preschool	46,921
ESSER	1,282,342
Perkins V	38,583
Total Funds	<u><u>\$5,389,277</u></u>

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Background

The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to districts within their local jurisdiction. The provision of these programs and services is based on the requirements as specified in each of the pertinent authorizing statutes (ESSA, IDEA or other federal law(s)).

The laws further require that state education agencies, in this case, the New Jersey Department of Education (NJDOE) to monitor the implementation and execution of federal programs by the sub recipients. The monitors thereby determine whether the funds are being properly used by the district for their intended purposes and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited the Pennsauken Township School District (district) to monitor the district's use of federal funds. It also monitors related program plans, as applicable, to determine whether the school's programs are meeting the intended purposes and objectives, as specified in the current year's applications and authorizing statutes.

The goal of the monitoring is to determine whether the funds were spent in accordance with the program's requirements, federal and state law and applicable regulations.

The on-site visit included: staff interviews and document and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title I SIA; Title II, Title III, Title III immigrant, Elementary & Secondary School Emergency Relief Fund (ESSER), IDEA Basic and Preschool and the Perkins V grant for the period July 1, 2020 through December 31, 2020.

The scope of work performed included the review of documents and documentation which included:

- accounting records
- annual audits
- board minutes
- current school policies and procedures
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEPs)
- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

Expenditures Reviewed

The grants reviewed included Title I, Title I SIA, Title II, Title III, Title III Immigrant, Title IV, ESSER, IDEA Basic and Preschool and the Perkins V grant from July 1, 2020 through December 31, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General Overview of Uses of Federal Funds

Title I Projects

The district is using its fiscal year 2020-2021 Title I funds to implement a targeted assistance program in one high school and schoolwide programs in the other seven Title I schools. Primarily, the district provides supplemental instructional opportunities through push-in and pull-out programs and extended day and extended year programs.

Title I SIA Projects

Title I – SIA funds are budgeted for extended day/extended year instructional staff salaries. The program focuses on the needs of students who are not on track to meet graduation requirements due to:

- not demonstrating proficiency on the State assessment (2019-20) or
- not successfully completing requisite courses (2020-21)

Title II Projects

Title IIA funds are being used to support the salaries of specific academic subject area coaches who work with teachers individually and in groups, including in the classroom.

Title III Projects

The district uses Title III funds for professional development, salaries, supplies and professional and technical services.

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Title III Immigrant Projects

The district uses Title III Immigrant funds for English language acquisition classes for parents of immigrant students.

Title IV Projects

Title IVA funds are being amended for use in a range of enrichment and academic support activities including robotics and prioritizing the needs of students who are identified as struggling in the remote learning environment.

IDEA Grant

The majority of the FY 2020 IDEA Basic funds are being used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. The nonpublic funds are used to provide therapeutic counseling and instructional aides.

There were no findings with the IDEA grant.

Perkins V

During SY 20-21, the district is implementing seven CTE programs (Carpentry, Cosmetology, Culinary Arts, HVAC, Welding, Electrical Construction and Fire Science) and two programs of study (Criminal Justice and Automotive).

Perkins V funds are being utilized to address several key areas identified by the Comprehensive Local Needs Assessment (CLNA). Work-Based Learning experiences are a key area of focus to come out of the CLNA. A Work-Based Learning Coordinator will be funded through Perkins V to continue to develop the Work-Based Learning opportunities for students as the district's programs expand and mature.

Additionally, funds are being utilized to provide support for teachers in terms of professional development around the area of differentiation particularly for students with disabilities and English language learners.

The district has allocated Perkins V funds to develop a mentoring program to provide support to specific student populations to help with retention and recruitment. While the program will be used to support all students, nontraditional students will be a key focus of the program.

Perkins V funds have also been allocated to provide support to size, scope and quality of the programs. These expenditures include the purchase of equipment and supplies to expand capacity of programs and support remote learning.

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Detailed Findings and Recommendations

Title I

Finding 1:

The district did not provide evidence of established entrance and exit criteria used to determine Title I student eligibility in the 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
- The district must provide a copy of its established entrance and exit criteria, for its Title I program, to the NJDOE for review

Finding 2:

The district did not provide evidence that notification letters were sent to the parents/guardians of identified Title I students for A.E. Burlington HS. 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 §1118(c): *Parental Involvement (Policy Involvement)*.

Required Action:

- The district must distribute parent notification letters to the parents/guardians of identified students. The notification letter must include clearly defined entrance and exit criteria
- The school must provide a copy of its parent notification letter for 2020-2021 to the NJDOE for review.

Finding 3:

The district did not provide school-level Title I parent and family engagement policies for all eight Title I schools. Additionally, there was no evidence that the district policy was reviewed since 2015. The annual review and current board adoption allow parents and other stakeholders to impact the parental involvement process and identify the unique needs of the Title I schools and Title I parents.

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Citations:

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 policies 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 provide evidence of the board's adoption of the district level policy (board meeting minutes).

Finding 4:

The district did not complete the Annual School Plan for all seven of its Title I schoolwide schools. In a Title I schoolwide program, the school must use Title I funds and services to upgrade the entire educational program while continuing to provide services to its lowest performing students. The Annual School Plan becomes the mechanism for the school to document its efforts to meet the purpose and intent of the Title I legislation and how the Title I funds will be used to support the program.

Citation:

ESEA §1114(b): *Schoolwide Programs: Components of a Schoolwide Program*.

Required Action:

- The district must ensure each school's 2020-2021 Annual School Plan reflects the current programs being delivered in each school and includes interventions for addressing the needs of the full continuum of students (including students with disabilities and gifted and talented students).
- Annual School Plans must be completed for all Title I schoolwide schools in the Annual School Planning System (ASPS) no later than April 2, 2021
- The district must contact the NJDOE if additional time is needed

Title I SIA

Finding 1:

The district did not show evidence of a completed Annual School Plan (ASP) for FY 2018-19, 2019-20 or 2020-21 for the Targeted Support and Improvement (TSI) school.

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Citation:

ESEA §1111(d) 2 (B): Targeted Support and Improvement Plan

Required Action:

- The district shall ensure the development of the FY 2020-21 ASP in the Annual School Planning System (ASPS) including all required components and its implementation. The plan must be developed jointly with a broad group of stakeholders and be based on a comprehensive needs assessment informed by data (including student performance against long-term goals) and evidence-based interventions.
- The district shall ensure the alignment of the SIA budget detail in the ASP and the ESEA Consolidated/Title I SIA application in EWEG.

Recommended Actions:

- Members of the ASP Team and the Primary ASP District Reviewer should review all ASP resources embedded in the ASPS under “Getting Started/Resources” and participate in the 2021-22 ASP professional learning opportunities offered by the New Jersey Department of Education (NJDOE), Office of Comprehensive Support Network (CSN).
- Members of the ASP Team and the Primary ASP District Reviewer should contact the ASP Helpdesk at help.asp@doe.nj.gov to receive technical assistance on the use of the ASPS and support with the development of the 2020-21 ASP prior to the launch of the 2021-22 ASP (anticipated March 2021).
- The ASP Team and the Primary ASP District Reviewer should ensure the priority performance needs of the identified TSI subgroup of “White” (if still applicable), are prioritized in planning and implementing SIA programs and services.

Title II

The review of Title II expenditures yielded no findings.

Title III

The review of the Title III grant yielded no findings.

Title III Immigrant

Finding 1:

The district was unable to provide adequate documentation of students who were counted, reported, and funded as immigrant students.

Citation:

ESEA §3115(g)

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Required Action:

- The district must identify and accurately report students to the New Jersey Department of Education who are immigrant students
- This reporting shall be by their country/place of birth, their district enrollment date and date of their first enrollment in a United States school
- The district must identify any students who were inadvertently reported as immigrants and provide such evidence to the New Jersey Department of Education.

The funds that were allocated for any students, who are not immigrants, must be reallocated.

Title IV

The review of the Title III grant yielded no findings.

IDEA Program

Finding 1:

The district did not consistently provide parents of students eligible for special education and related services notice of a meeting that contained all required components. The district did not consistently provide parents of students eligible for special education and related services with sufficient notice of the meeting which contained all required components. Specifically, the notices did not consistently include a list of the anticipated participants and did not include a statement advising the parent that other appropriate individuals could be invited at the discretion of the parent.

Citation:

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

Required Action:

- The district must ensure that parents are provided with sufficient notice of a meeting that contains all required components
- The notice must be given early enough to ensure that the parent has an opportunity to attend
- In order to demonstrate correction of noncompliance the district must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above

A monitor from the NJDOE will conduct a site visit to:

- interview staff
- review copies of notices of meetings for meetings conducted between April 2021 and June 2021 and review the oversight procedures

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Finding 2:

The district did not consistently document that required participants, specifically general education teachers, were in attendance at the annual review, the reevaluation planning meeting, and the eligibility and IEP meetings for students eligible for special education and related services who are in out of district placements.

Citations:

N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a)

Required Action:

- The district must ensure that meetings are conducted with the required participants and that documentation of attendance and/or written parental consent to excuse a member of the team, if applicable, are maintained in student files
- 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, including sign-in sheets, for meetings conducted between April 2021 and June 2021 review the oversight procedure
- review the oversight procedures

Perkins V

The review of Perkins V expenditures yielded no findings.

Administrative

Finding 1:

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.

Citations:

Uniform Grant Guidance 2 C.F.R. 200.300; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law

Required Action:

- The district must issue purchase orders to all vendors prior to goods or services being provided

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Finding 2:

The district charged several expenditures related to federal grants incorrect general ledger codes. For example, equipment with a cost in excess of \$2,000 were incorrectly charged to non-supplies in the general ledger.

Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Required Action:

The district must charge expenditures to the appropriate general ledger account in accordance with the Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Finding 3:

The district formally appointed some but not all individuals charged to the federal programs, by board resolution.

Citation:

Uniform Grant Guidance (UGG) 2 C.F.R. 200.302

Required Action:

All staff charged to federal grants should be reappointed annually by board resolution

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Finding 4:

The district 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 grant related duties. Employees with less than 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.

Required Action:

- The school must ensure that all federally funded employees submit personal activity reports as required

Finding 5:

The district did not provide detailed schedules, by individual, of salaries that agreed with the expenditures charged to the programs in the general ledger.

Citation:

Uniform Grant Guidance (UGG) 2 C.F.R. 200.302

**Pennsauken Township School District
Collaborative Monitoring Report
March 2021**

Required Action:

- The school must maintain records that account for the salary amounts charged to the federal grants, by individual

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.