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Perth Amboy School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
May 2021

District: Perth Amboy School District
County: Middlesex
Dates Monitored: February 23, 24 and 25, 2021
Case #: CM-06-21

Funding Sources

Program	Funding Award
Title I, Part A	\$4,205,284
Title II	672,992
Title III	776,882
Title III Immigrant	80,545
IDEA - Basic	3,039,175
IDEA - Preschool	62,052
ESSER	2,904,336
Digital Divide	377,469
Total Funds	<u>\$12,118,735</u>

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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 Perth Amboy 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 II, Title III, Title III Immigrant, Elementary & Secondary School Emergency Relief Fund (ESSER), Digital Divide and IDEA Basic and Preschool for the period July 1, 2020 through January 31, 2021.

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

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

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- interview of the program administrator regarding the IDEA grant

Expenditures Reviewed

The grants reviewed included Title I, Title II, Title III, Title III Immigrant, ESSER, Digital Divide and IDEA Basic and Preschool from July 1, 2020 through January 31, 2021. 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 Perth Amboy Public School District serves grades K-12 and operates Title I schoolwide programs in all its Title I-funded schools. During the 2020-2021 school year, the district programmed and budgeted its Title I, Part A allocation in the following areas: 1) instructional materials and supplies; 2) extended day/year programs; 3) data coach support in the core academic subjects of English language arts and mathematics; and 4) parent and family engagement.

The district is commended for providing a multitude of Title I-funded extended day/year programs to students and ongoing workshop and training opportunities to parents. These programs and services are strength areas for the district, especially given the correlation to student subgroups making growth targets in English language arts and mathematics. In addition, the district is commended on its focused work to establish ongoing and effective processes that ensure nonpublic school students, and their teachers and parents benefit from Title I-funded services.

Title II Projects

The district is using Title IIA funds for professional development in the areas of mathematics, language arts and social-emotional learning.

Title III Projects

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

Title III Immigrant Projects

The district uses Title III Immigrant funds workshops related to issues impacting immigrant families and to fund an academic afterschool program for students new to the country who have interrupted formal education.

IDEA Grant

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

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disabilities, professional development, for evaluations and for supplies and materials. The nonpublic funds are used to provide supplemental instruction, speech services, professional development, and instructional materials for students.

There were no findings for the IDEA grant.

Detailed Findings and Recommendations

Title I

Finding 1:

The district did not provide documented evidence of its notification to parents and adult students (18 of age or older) concerning information disclosed to military recruiters, postsecondary institutions, or prospective employers, when requested.

Per ESEA legislation, parents must be notified that districts routinely disclose names, addresses, and telephone numbers to military recruiters, postsecondary institutions, or prospective employers, subject to a parent's request not to disclose such information without prior written consent.

The notification must advise parents of how to opt-out of the public, nonconsensual disclosure of this information and the method and timeline within which to do so.

Citation(s):

ESEA §8528(a)(2): Armed Forces Recruiter Access to Students and Student Recruiting Information Consent

Required Action(s):

The district must immediately distribute the required notification regarding the disclosure of students' names, addresses and telephone numbers, upon request, to military recruiters, postsecondary institutions, and/or prospective employers.

The notification must include information on how parents may opt-out of this public, nonconsensual disclosure of information, as well as the method and timeline within which to do so.

The district must keep on file the signatures of parents who have requested not to disclose such information.

The district must submit with its corrective action plan documented evidence of the distribution of this notification.

Additional Recommended Action(s):

The NJDOE recognizes and acknowledges that the COVID-19 pandemic presented the district with many unforeseen challenges during the 2019-2020 school year. Inevitably, these circumstances impacted the district's Title I, Part A program, including the comprehensive needs

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assessment (CNA) process, as well as the development of Annual School Plans (ASPs) in all applicable schools. The following recommendations are presented to assist the district in continuing to meet these challenges by further strengthening and enhancing its Title I, Part A programs and services:

- **Comprehensive Needs Assessment** – It is recommended the district include more specific information regarding grade levels, target populations, performance targets, and the identification of data sources in the comprehensive needs assessment conducted for the district's ESEA Application, as well as those for all Annual School Plans (ASPs). In this way, all comprehensive needs assessment information is in alignment, and shows a clearer connection to data driven decision-making and the importance of stakeholder engagement.
- **Annual School Plan (ASP)** – It is recommended, whenever possible, to include more than one (1) parent and more than one (1) community member as representatives on all ASP stakeholder planning teams. This improves stakeholder engagement by ensuring these relevant stakeholders more actively participate in the development, implementation, and evaluation of all Annual School Plans (ASPs). Additionally, stakeholder engagement in the ASP process should happen throughout the entire school year, as much as possible, rather than occur in a one- or two-month timeframe. Lastly, one or more students must serve as stakeholders in the development, implementation, and evaluation of the ASP for Perth Amboy High School.
- **Nonpublic School Consultation** – It is recommended the district ensure the most current Nonpublic Refusal of Funded Services form is used with all nonpublic schools and that all sections of the Affirmation of Consultation forms are completed in their entirety. This information can be found on the Nonpublic School Services "[Federally Funded Programs & Services](https://www.nj.gov/education/nonpublic/federal/)" webpage at <https://www.nj.gov/education/nonpublic/federal/>.
- **Parental Notifications** – It is recommended the district review the updated parent and family engagement resources and policy templates on the Title I website at [Title I, Part A Parent Family Engagement](#).
- **Educational Stability for Children in Foster Care** – It is recommended the district review the updated policy information found on the Title I "[Educational Stability for Children in Foster Care](https://www.nj.gov/education/foster/)" webpage at <https://www.nj.gov/education/foster/>.

Title II

The review of the Title II grant yielded no findings.

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Title III

Finding 1:

The district did not meet the Title III requirement that districts monitor, for two years, the progress made by exited former English Language Learners (ELLs) on content and achievement standards.

Citation:

ESEA §3121

Required Action:

Perth Amboy must develop and implement a protocol for monitoring the academic progress of ELLs who have exited by:

- Creating a written standard operation procedure for supervisors and general education teachers to monitor students in content area classes
- Creating a written procedure to identify the criteria by which a student would re-enter a language program within two years if they do not demonstrate progress in general education classes due to English language proficiency level
- Use the Department's sample Former ELL Monitoring tool as a model to create a district form to implement and collect data on the student's progress (Source: Under the [Program Resources](#) tab)

Recommendations:

Citations:

ESEA §3115(g), §3116(c), §1112(e), §3115(c)

Perth Amboy School District uses Title III funds for allowable expenses. Still, there is an opportunity to use funds more effectively to support English language learners (ELLs).

The district should:

- Use English language proficiency indicator data and performance report data to identify trends in language domains, grade levels, and schools (and classrooms) for students who are not meeting ESSA indicators
- Create a professional development plan for general education teachers to learn how to make content accessible, including sheltered strategies
- Create pathways for paraprofessionals to gain bilingual/bicultural certification to address the bilingual teacher shortage, in coordination with Title II and Title IV funds

Title III Immigrant

The review of the Title III Immigrant grant yielded no findings.

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Recommendations:

Citation:

§3115(c), ESEA §3115(e), §3115(g)

Recommended Actions:

Perth Amboy School District uses Title III funds for allowable expenses. Still, there is an opportunity to use funds more effectively to support immigrant children and youth to acclimate to a new U.S. school.

The district should:

- Use all allocated funds within the current fiscal year and reduce carryover of funds from year to year
- Consider creating a program to support a cohort of parents of immigrant children and youth to gain leadership and English language fluency skills. In addition act as community leaders who establish a rapport with other parents, share school related information, gain buy-in with and exchange, school related information
- Consider using a model similar to Las Comadres Model which creates an environment of sisterhood, trust, support and education

IDEA Program

Finding 1:

The district did not consistently provide parents of students eligible for special education and related services notice of meetings that contained all required components.

Specifically, the notices did not consistently:

- include an accurate list of participants
- contain an accurate description of the purpose of the meeting
- include requests for parental consent to excuse an IEP team member
- indicate that evaluation reports were provided at least ten days prior to eligibility meetings, when evaluations were conducted

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 consider and 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.

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

- interview staff
- review notice of a meeting provided for meetings conducted between July 2021 and October 2021
- review the oversight procedures

Finding 2:

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

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 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 staff 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 July 2021 and October 2021
- review the oversight procedures

Finding 3:

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

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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 July 2021 and October 2021
- review the oversight procedures

Administrative

Finding 1:

As of the date of the monitoring visit (February 25, 2021), the district had not filed or paid their New Jersey TPAF and FICA reimbursement for FY 2019-2020. The report and payment were due October 1, 2020.

Citation:

N.J.S.A. 18A:66-90

Required Action:

The school must file and remit funds due for the 2018/2019 New Jersey TPAF and FICA reimbursements. Future reimbursements must be filed timely.

Recommendation 1:

The district 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.