

**State of New Jersey  
Department of Education  
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**Guttenberg School District**

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*New Jersey K to 12 Education*

**Collaborative Monitoring Report  
May 2021**

**District:** Guttenberg School District  
**County:** Hudson  
**Dates Monitored:** March 3 and 4, 2021  
**Case #:** CM-07-21

**Funding Sources**

Program	Funding Award
Title I, Part A	\$ 811,982
Title II	100,270
Title III	38,157
Title III Immigrant	10,887
Title IV	59,797
IDEA - Basic	248,565
IDEA - Preschool	9,396
ESSER	651,041
Total Funds	<u><u>\$1,930,095</u></u>

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**Background**

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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**

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The NJDOE visited the Guttenberg 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, Title IV, Elementary & Secondary School Emergency Relief Fund (ESSER), 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)

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- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

**Expenditures Reviewed**

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The grants reviewed included Title I, Title II, Title III, Title III Immigrant, Title IV, ESSER, 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**

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**Title I Projects**

The Guttenberg School District is a single attendance, PK-8 district and operates a Title I schoolwide program in its single, Title I-funded school. During the 2020-2021 school year, the district programmed and budgeted its Title I, Part A allocation in the following areas: 1) parent and family engagement; 2) instructional staff for in-class support programs; 3) extended day/year programs; 4) increased learning time; 5) professional development; and 6) instructional materials and supplies.

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.

**Title II Projects**

The district is using Title IIA funds for class size reduction, and for professional development in the areas of language arts and mathematics.

**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 funds for salaries, supplies, and purchased services.

**Title IV Projects**

The district is using Title IVA funds for afterschool counseling interventions, additional curriculum resources to update the social studies program, and technology to support remote learning.

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**IDEA Grant**

The majority of the FY2021 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, classroom materials, and contracted related and child study team services.

There were no findings with the IDEA grant.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

The district uploaded its Homeless Services policies and procedures rather than its Educational Stability for Children in Foster Care transportation policies and procedures to its FY 2021 ESEA Consolidated Subgrant Application.

**Citation:**

ESEA §1112(c)(5)(B) Assurances – Written Policies and Procedures

**Required Action(s):**

The district must amend its FY 2021 ESEA Consolidated Subgrant Application to upload a current, Board approved copy of its written, Educational Stability for Children in Foster Care transportation policies and procedures. Per ESEA legislation, these policies and procedures must delineate how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded in a cost-effective manner for the duration of the children’s time in foster care.

**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 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

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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. For the Perth Amboy High School, one or more secondary students must serve as stakeholders on the school's ASP stakeholder planning team. 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, it is recommended the district develop school-level procedures to ensure the ongoing monitoring and evaluation of each ASP. In doing so, each school can use this information to update and/or enhance the programs, services, and/or activities implemented through each ASP; as well as communicate this information with all relevant stakeholders.

**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 website 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**

To further enhance district policies regarding the 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](#)" webpage: <https://www.nj.gov/education/foster/>.

**Title II**

The review of Title II grant yielded no findings.

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**Title III**

The review of the Title III grant yielded no findings.

**Recommendation:**

The district should update the monitored student exit form to reflect the current state assessment, New Jersey Student Learning Assessment (NJSLA), rather than Partnership for Assessment of Readiness for College and Careers (PARCC) which is no longer used in New Jersey.

**Title III Immigrant**

**Finding 1:**

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

**Title IV**

The review of the Title IV grant yielded no findings.

**IDEA Program**

**Finding 1:**

The district did not consistently provide parents of students referred and/or eligible for special education and related services and students referred and/or eligible for speech-language services notice of a meeting for identification, eligibility, reevaluation planning and annual review meetings.

**Citations:**

N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a)

**Required Actions:**

The district must provide parents notice of a meeting in writing early enough to ensure they have an opportunity to attend.

In order to demonstrate correction of noncompliance, the district school 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 citations listed above.

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

- interview staff
- review copies of notices of meetings conducted between September 2021 and November 2021

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- review the oversight procedures

**Finding 2:**

The district did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for special education and related services to determine if an evaluation was warranted.

**Citations:**

N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b)

**Required Actions:**

The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for 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(s) listed above.

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

- interview staff
- review documentation from identification meetings conducted between September 2021 and November 2021
- review the oversight procedures

**Finding 3:**

The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- supplementary aids and services considered and an explanation of why they are not appropriate
- comparison of the benefits provided in the regular 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

**Citation:**

N.J.A.C. 6A:14-4.2 (a)8(iii) and 3.7(k)

**Required Action:**

The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required

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decisions regarding the placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day.

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(s) 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:

- to interview staff
- review the revised IEPs
- review a random sample of IEPs developed at meetings conducted between September 2021 and November 2021
- review the oversight procedures

The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

**Administrative:**

The administrative/fiscal review yielded no findings.

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).