

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

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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
May 2021

**District:** Millville School District  
**County:** Cumberland  
**Dates Monitored:** March 9, 10 and 11, 2021  
**Case #:** CM-08-21

**Funding Sources**

Program	Funding Award
Title I, Part A	\$2,526,791
Title I SIA	1,425,493
Title II	113,948
Title III	19,337
Title III Immigrant	2,810
Title IV	263,033
IDEA - Basic	1,837,814
IDEA - Preschool	31,797
Perkins V	69,839
ESSER	1,647,718
Total Funds	<hr/> <u>\$7,938,580</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 Millville 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, Title IV, Elementary & Secondary School Emergency Relief Fund (ESSER), Perkins V and IDEA Basic and Preschool for the period July 1, 2020 through February 28, 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 I SIA; Title III, Title III Immigrant, Title IV, ESSER, Perkins V, and IDEA Basic and Preschool from July 1, 2020 through February 28, 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 district operates schoolwide programs in all of its Title I funded schools. Primarily, the district provides supplemental instructional opportunities through tutoring, and extended year programs. The district also provides programming for parent and family engagement activities.

**Title I SIA Projects**

Title I – SIA funds are used for supplemental instructional materials and supplies, including technology, and for contracting with external partners for a variety of services including professional development for teachers and supplemental supports for students. Allocations were also used to support salaries and benefits of personnel for coaching and intervention activities.

**Annual School Plan (ASP)**

It is recommended, to ensure all allocations of SIA funds are listed within the SMART Goals sections, in addition to the Budget section of the ASP and in alignment with the ESEA application.

**Title II Projects**

The district uses Title IIA funds to provide professional development of administrators on using the Danielson system and for materials for teacher professional development.

**Title III Projects**

The district uses Title III funds for supplies and salaries.

**Title III Immigrant Projects**

The district uses Title III Immigrant funds for supplies.

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**Title IV Projects**

The district utilizes Title IVA funds for a number of activities related to arts integration, robotics, a mobile STEM lab and math manipulatives to support remote learning. The district also held a virtual Equity Summit which provided professional learning on culturally responsive teaching, and social emotional learning. Neighboring districts were invited to attend.

**IDEA Projects**

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 consultants, summer professional development, summer child study team evaluations and Community Based Instruction. The FY 2021 IDEA Preschool funds are used to partially fund an in-class resource teacher, including employee benefits.

There were no findings with the IDEA grant.

**Perkins V**

The District FY 20/2021 Perkins V funds are being used at Millville High school to operate Perkins V federal funded program and programs of study offered to students participating in Career and Technical Education (CTE) in Cultural Arts Program, and three programs of study are offered: Automotive Technology; Computer Science/Programming General; Engineering Technology General.

CTE students are offered opportunities to achieve certifications prior to graduation. The district has articulation agreements with post-secondary institutions to provide students with opportunities for education beyond high school. Advisory Board members provide the district feedback on how to adjust and improve the curriculum to meet the changing requirements due to the pandemic.

**Detailed Findings and Recommendations**

**Title I, Part A**

**Finding 1:**

The district did not complete Annual School Plan's for all of its non-categorized 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 focus on 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.

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**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 May 31, 2021. The district must contact the NJDOE if additional time is needed.

**Finding 2:**

The district did not submit evidence of a policy for the Educational Stability for Children in Foster Care that addresses the following:

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

**Citation:**

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

**Required Action:**

The district must have a written policy for the Educational Stability for Children in Foster care to include all elements listed above. The district must submit copies of a recent board approved district educational stability policy to the NJDOE, as part of the corrective action plan, for review.

**Title I SIA**

Review of Title 1 SIA expenditures yielded no findings.

**Title II**

**Finding 1:**

Documentation of stakeholder participation was not provided.

**Citation:**

ESEA §2102(b)(D)

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**Required Action:**

It is understood that due to the global pandemic, in-person sign in sheets are not available. However, the district may submit meeting minutes or printouts of attendees from Zoom meetings to satisfy this requirement.

**Title III**

A review of the Title III grant yielded no findings.

**Title III Immigrant**

**Finding 1:**

The district was provided documentation of students who were counted, reported, and funded as immigrant students. However, there were two students who did not meet the federal definition of an immigrant student since their entry date into a US school was more than three years ago.

**Citation:**

ESEA §3115(g)

**Required Action:**

The district must:

- identify and report students to the NJDOE (by providing an updated list of immigrant students) who are immigrant students by accurately providing their country/place of birth, district enrollment date and date of first enrollment in a United States school
- Submit an updated list of immigrant students to the NJDOE within 60 days after the district's receipt of this report
- The district must identify the two students who were inadvertently reported as immigrants and provide such evidence to the NJDOE
- Reallocate the funds that were allocated for the students who are not immigrants

**Title IV**

**Finding 1:**

Documentation of stakeholder participation was not provided.

**Citation:**

ESEA §2102(b)(D)

**Required Action:**

It is understood that due to the global pandemic, in-person sign in sheets are not available. However, the district may submit meeting minutes or printouts of attendees from virtual meetings to satisfy this requirement.

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**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 with all the required components for identification, eligibility, reevaluation planning, redetermination of eligibility and IEP meetings.

Notices did not consistently include the purpose of the meeting and the proposed participants.

**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, with 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 speech-language specialists 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 copies of invitations for meetings conducted between July 2021 and October 2021
- review the oversight procedures

**Finding 2:**

The district did not consistently provide parents or adult students written notice of graduation containing all required components prior to graduation.

**Citation:**

N.J.A.C. 6A:14-4.11(b)1

**Required Action:**

The district must ensure that parents or adult students are provided with written notice of graduation containing all required components prior to graduation.

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.

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

- interview staff
- review written notice of graduation provided for a sample of students who are graduating/exiting at the conclusion of the 2020-2021 school year
- review the oversight procedures

**Finding 3:**

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 and for students referred for speech-language services.

Initial evaluation reports did not consistently include:

- observations of the student in a non-testing setting
- parent interview
- teacher interview

**Citations:**

N.J.A.C.6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5) and 34 CFR §300.306(c)(i)

**Required Actions:**

The district must ensure all components of the functional assessment are conducted as part of all initial evaluations.

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 citations listed above.

Monitors from the NJDOE will conduct a site visit to:

- interview staff
- review initial evaluation reports for students evaluated between July 2021 and October 2021
- review the oversight procedures

**Finding 4:**

The district did not consistently document all required considerations and statements in the Individualized Education Programs (IEPs) of students eligible for special education and related services and of students eligible for speech-language services.

IEPs developed for students eligible for special education and related services did not consistently include the specific location for related services. IEPs developed for students eligible for speech-language services did not include supports for school personnel and a



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statement of how the student's parents will be regularly informed of their student's progress towards annual goals and objectives.

**Citations:**

N.J.A.C. 6A:14-3.7(e) 1-17 and (f); 20 U.S.C. §1414(d)(3)(A)(B) and 34 CFR §300.324(a)(1)(2)

**Required Actions:**

The district must ensure each IEP contains the required considerations and statements. 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(s) listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant.

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

- interview staff
- review the revised IEPs
- review a sample of IEPs for students whose annual review meetings were conducted between July 2021 and October 2021
- 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 5:**

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, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently identify the supplementary aids and services considered and an explanation of why they are not appropriate.

**Citations:**

N.J.A.C. 6A:14-4.2 (a) 4, 8(iii) and 3.7(k)

**Required Actions:**

The district must ensure that when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than twenty percent of the school day.

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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:

- interview staff
- review the revised IEPs
- review a random sample of IEPs developed at meetings conducted between July 2021 and October 2021
- 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 6:**

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)5(ii)

**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 requirement in the citation listed above.

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

- interview staff
- review a random sample of student invitations for transition IEP meetings conducted between July 2021 and October 2021
- review the oversight procedures

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**Perkins V**

**Finding 1:**

The district provided most of the required documentation for eligibility. However, the documentation is limited in the following areas:

- Approved CTE programs that are recognized programs of study (POS)
- Automotive Technology Articulation Agreement between the higher institution, UNOH, and the district. The Articulation Agreement the district provided was dated 3/12/19 and 2/22/19 respectively signed by UNOH and the district
- Missing from UNOH Articulation Agreement is the current annual period 20/2021  
The district provided a cover letter dated March 12, 2021 “to Whom it May Concern”

**Citations:**

Perkins Act §135(b)1-6, Sec. 135. Local use of funds, Carl D. Perkins Career and Technical Education Act of 2002 as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century, N.J.A.C. 6A:19 Career and Technical Education and Programs and Standards

**Required Action:**

Articulation agreements must be updated annually and signed by the lead administrators of the secondary and postsecondary institutions, or by lead administrator designee, if the lead administrator has given, he/she/they the authority to work in this capacity such as a Dean. The secondary must be the Chief School Administrator/Superintendent.

**Recommendation:**

The district should upload any current articulation agreements, Industry Valued Credentials (IVC's) or Apprenticeship information in NJDOE Data Home in [NJDOE Homeroom \(https://homeroom.state.nj.us/\)](https://homeroom.state.nj.us/). Click on CTEDMS Career Education and Technology Management Data System link, so that approved programs of study could be recognized as POS in CTE DMS. The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance.

**Finding 2:**

The district had limited documentation for some course descriptions of CTE curricula.

**Citations:**

Perkins Act §135(b)1-6, N.J.A.C. 6A:19 Career and Technical Education Programs and Standards, N.J.A.C. 6A:8 Standards and Assessments, Sub Chapter 3 Implementation of the New Jersey Student Learning Standards, 6A:8-3.1 Curriculum and instruction.

**Required Action:**

The district must ensure all course curriculum are align with New Jersey Student Learning Standards (SLS) and the curriculum must be board approved. CTE webpages [New Jersey Student Learning Standards \(nj.gov/education/cccs/\)](http://nj.gov/education/cccs/) and [2020 NJSLS](#)

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[\(nj.gov/education/cccs/2020/\)](http://nj.gov/education/cccs/2020/) provide links to 2020 NJ SLS, information regarding curriculum implementation dates, and COVID-19 Guidance Adopted 2020 New Jersey Student Learning Standards. The district may contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance.

**Finding 3:**

The district provided majority of the required documentation for review of local use section of Perkins V approved federal funds. However, the district provided no evidence showcasing the implementation of planned activities outlined in the local Comprehensive Local Needs Assessment (CLNA) for FY21. Specifically, proof of how the district provided career information and a range of career development activities in collaboration with local workforce development boards, other local workforce agencies and other partners.

**Citations:**

Perkins Act §135(b)1-6 Carl D. Perkins Career and Technical Education Act of 2006 as Amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act N.J.A.C. 6A:19 Career and Technical Education Programs and Standards.

**Recommendation:**

Recommended documents of evidence:

- Addition of Industry Valued Credentials (IVCs)
- Middle school awareness
- Current Articulation Agreements
- Implementation of recruitment efforts
- The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance

**Finding 4:**

Requirements for use of funds. The district provided limited evidence of the requested documentation for review in this section. Therefore, there is not a clear and understanding of the implementation of activities carried out by the district listed below:

- Implementation of mechanism and activities of shows how the middle grades College and Career Awareness requirement was delivered and integrated with other subjects (i.e. math, science, arts)
- Documentation that supports and ensures how student graduation plans are linked to the state's high school college- and career-ready accountability framework, focus on goals around Perkins V indicators and employability skills

**Citations:**

Perkins Act §135(b)1-6, Carl D. Perkins Career and Technical Education Act of 2006 as Amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, N.J.A.C. 6A:19 Career and Technical Education Programs and Standards

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**Recommendation:**

The district should review below the *Compliance Requirement and Legal Authority* to ensure sufficient evidence is identified for meeting the compliance and implementation of the approved Perkins V federal funded program and programs of study: (1) provide career exploration and career development activities through an organized, systematic framework designed to aid students, including in the middle grades, before enrolling and while participating in a career and technical education program, in making informed plans and decisions about future education and career opportunities and programs of study, which may include:

- introductory courses or activities focused on career exploration and career awareness, including non-traditional fields
- readily available career and labor market information, including information on
  - (i) occupational supply and demand
  - (ii) educational requirements.
  - (iii) other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and
  - (iv) employment sectors, programs and activities related to the development of student graduation and career plans
- career guidance and academic counselors that provide information on postsecondary education and career options
- any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields
- providing students with strong experience in, and comprehensive understanding of, all aspects of an industry. The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance
- The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance

**Finding 5:**

The district provided documentation regarding registration and payment of the required training of a Work-Base Learning (WBL) coordinator through New Jersey Safe Schools Program (NJSSP). All four course registrations/payments were provided. No samples of certificates of completion were provided. Further, the district has not provided any other documentation/evidence listed in the bullet points below to determine implementation of compliance for providing professional development in FY21 for approved Perkins federal funded CTE programming. Documentation that supports demonstration of Professional Development (PD) of CTE staff:

- Evidence of the implementation of an on-going process to incorporate high-quality professional development for administrators, teachers and counselors related to addressing gaps and disparities specific to CTE
- District-wide PD plan/master faculty schedule of PD
- PD plan for approved CTE programs and/or Programs of Study (POS) CTE staff

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- Certificate of attendance at CTE workshops and conferences
- CTE Conference or workshop materials for PD offered by LEA: sign-in sheet(s), agendas, and related conference and/or workshop materials
- Identify specialized personnel used to operate eligible CTE Programs and/or POS

**Citations:**

Perkins Act §135(b)1-6, Carl D. Perkins Career and Technical Education Act of 2006 as Amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, N.J.A.C. 6A:19, Career and Technical Education Programs and Standards, N.J.A.C. 6A:8 Standards and Assessment, Subchapter 3 Implementation of the New Jersey Student Learning Standards, 6A:8-3.2 Career Education and Counseling

**Required Action:**

The district must ensure that documentation be provided on any training that may have occurred during FY21 specifically for Perkins federal funded CTE programs personnel. The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance.

**Finding 6:**

The district provided a Cumberland county partner contact list of individuals. The district also provided meeting minutes, email invitations, agendas, thank you emails and contact advisory committee member list for the required advisory committees for each approved CTE program. The district provided limited documentation/evidence to support sufficient/full compliance in this section.

**Citations:**

Perkins Act §135(b) 3-4, Perkins Act §135(b)1-6, Carl D. Perkins Career and Technical Education Act of 2006 as Amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, N.J.A.C. 6A:19, Career and Technical Education Programs and Standards

**Recommendation:**

The district should ensure additional support documentation shows:

- Activities to prepare special populations for high-skill, high-wage or in-demand industry sectors or occupations that will lead to self-sufficiency
- The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance

**Finding 7:**

The district provided copies of journal entries from a single student reflecting on the Student Learning Experience (SLE). Documentation was provided in student information regarding name, program, company, supervisor, contact number and future. Graduate student surveys were provided. Moreover, the district provided a copy of the CTE Safety and Health plan 2014. Administrative code requires that this plan be updated and approved by the district board of

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education every 5 years and encompasses all district CTE programs in hazardous occupations. The district provided no additional support documentation to support implementation of Work-Based Learning (WBL) activities such as:

- The work-based learning opportunities are provided to students participating in CTE programs and how the LEA work with representatives from employers to develop or expand work-based learning opportunities, as applicable, as well as flexibility of traditional in-class, in-person instruction that includes hybrid and virtual learning
- Business/Agency Agreement Forms
- Individualized Student Training Plans
- Worksite Evaluation (every 10 days) Forms
- Employment Working Certificates
- Members of special populations will not be discriminated against based on their status as members of special populations and provide equal access for special populations to CTE courses, programs, and programs of study (such as a signed statement of assurance and/ or contract, entry requirements, prerequisite in play for CTE programs, accommodations, modifications, etc.)
- show students participating in CTE are provided with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school, as practicable
- Copy of current safety and health plan that encompasses all district CTE programs in hazardous occupations
- Board of Education minutes and resolution adopting and approving each plan

**Citations:**

Perkins Act §135(b)1-6 Local Uses of Funds Carl D. Perkins Career and Technical Education Act of 2006 as Amended by Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, N.J.A.C. 6A:19 Career and Technical Education Programs and Standards And Sub Chapter Safety and Health Standards,6A:19-6.1 Applicability and implementation of safety and health standards for career and technical education, 6A:19-6.2 Safety and health standards: adoption by reference

**Required Action:**

The district must ensure and provide evidence of implementation of Work-Based Learning (WBL) activities of FY 20/2021. The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance.

**Finding 8:**

The district did not provide supporting documents to verify the activities of one of the district's employees who was paid \$775.00 with Perkins funds during the period August 12-18, 2020. As a result, it could not be determined if the charge was reasonable, necessary or allocable to the federal award. Furthermore, all costs must be adequately documented to be considered allowable in accordance with federal cost principles.

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**Citation(s):**

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UGG), 2 CFR § 200.403: Factors affecting allowability of costs.

**Required Action:**

The district must reverse the charge and provide documentation of the reversal to the department. Going forward, the district must verify the time and activity of staff charged to federal grants. The documentation must reflect what the staff is doing, when and where. The documentation must also identify the department approved program or program of study which benefited from the activity.

**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. 200.302; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

**Required Action:**

Purchase orders should be issued to all vendors prior to goods or services being provided.

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).