

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

Estell Manor Public School District

128 Cape May Avenue
Estell Manor, New Jersey 08319
Phone: (609) 476-2267



New Jersey K to 12 Education

Collaborative Monitoring Report
July 2021

District: Estell Manor Public School District
County: Atlantic
Dates Monitored: May 11, 12 and 13, 2021
Case #: CM-11-21

Funding Sources

Program	Funding Award
Title I, Part A	\$55,167
Title II	16,934
Title IV	19,501
IDEA - Basic	65,129
IDEA - Preschool	1,698
ESSER	34,931
Total Funds	<hr/> <u>\$193,360</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 Estell Manor Public 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 IV, Elementary & Secondary School Emergency Relief Fund (ESSER), IDEA Basic and Preschool for the period July 1, 2020 through April 30, 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

The grants reviewed included Title I, Title I, Title II, Title IV, Title III, ESSER, IDEA Basic and Preschool from July 1, 2020 through April 30, 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 Estell Manor School District is a one-school district that serves grades K–8 and operates a Title I targeted assistance program. During the 2020-2021 school year, the district programmed and budgeted its Title I, Part A allocation for activities in the following areas:

- 1) extended day/year programs; and
- 2) professional development activities.

Please Note: Over the last several years, the Estell Manor School District has experienced significant turnover in the following school administration positions: chief school administrator, business administrator, ESEA project director, and curriculum director. Staff currently holding these positions have done so for one (1) year or less. Unfortunately, the prior administration did not establish policies and procedures regarding the implementation of Title I, Part A funded programs and services or the grants management process regarding the usage of all FY 2021 ESEA funds awarded to the district. This type of information would have provided the current district administration officials an historical perspective on how the district identified specific needs and how the district had planned to address these needs using FY 2021 Title I, Part A funds. As a result, the current administration officials were unable to clearly articulate how identified needs were selected or why Title I, Part A funds were used for particular programs and budgeted costs as articulated in the district’s FY 2021 ESEA Consolidated Subgrant Application.

Title IIA Projects

The district transferred all Title IIA funds to Title I

Title IVA Projects

The district transferred all Title IVA funds to Title I

IDEA Grant

The FY 2021 IDEA Basic and Preschool funds are used for tuition for students attending out-of-district placements.

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There were no findings with the IDEA grant.

Detailed Findings and Recommendations

Title I, Part A

Finding 1:

The district did not provide documented evidence to show it implemented a viable, Title I, Part A targeted assistance program for eligible academically at-risk students, their teachers, and their parents during the 2020-2021 school year.

Citation:

ESEA §1115(b) Targeted Assistance Schools – Targeted Assistance School Program

Required Actions:

The district must establish policies and procedures to ensure that at the beginning of the 2021-2022 ESEA project period (July 1, 2021), the district implements a viable, Title I, Part A targeted assistance program for eligible children identified as failing or most at risk of failing to meet the challenging, State academic standards. The 2021-2022 Title I, Part A targeted assistance program must meet all legislative requirements as articulated in ESEA §1115(b). A copy of these policies and procedures must be submitted as part of the district's Corrective Action Plan (CAP).

Recommended Actions:

The following recommendations are presented to assist the district in creating and implementing a viable Title I, Part A program, as well as other ESEA title programs for which the district receives an allocation of funds:

- The district administration should review the ESEA legislation, to gain an enhanced understanding of the rules and regulations for each title program under ESEA
- The district administration should share this information to the entire staff of the district, as well as to parents and families and other relevant community members

The district administration officials should establish policies and procedures to be approved by its Board of Education in the following areas:

- Completion and evaluation of the Comprehensive Needs Assessment (CNA), to include the following elements:
- Data Collection – the identification and analysis of both quantitative and qualitative data
- Stakeholder Engagement - the establishment of a team of all relevant stakeholders to actively participate in the CNA process (e.g., administration

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officials, instructional staff, non-instructional staff, support personnel, parents and other community members)

- Progress Monitoring (Evaluation) – the mechanisms by which the district will continually monitor (evaluate) progress toward established program outcomes
- Completion and submission of all future ESEA Consolidated Subgrant Applications to occur through the collaborative work of the ESEA Program Coordinator and the School Business Administrator
- Ongoing monitoring of the Title I-funded programs and services (as well as all other titles) for effectiveness and fidelity of implementation
- Monthly submission of reimbursement requests through the EWEG system

Finding 2:

The district did not provide documented evidence that it conducted a CNA to include the active participation of all representative stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, other community members). The CNA did not identify target populations, specific causes of needs based on data analysis, specific school performance targets, or prior year outcomes. Rather, the CNA seemed to repeat many of the same elements that had appeared in the CNAs in the district’s ESEA Applications from the last several years, with no direct connection to data analysis. Since the CNA is an ongoing process, not a one-time event, the district must institute processes to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families.

Citation:

ESEA §1112(c)(6) Local Educational Agency Plans - Assurances

Required Actions:

Since the CNA is an ongoing process the district must institute processes to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families. As part of the CAP the district must submit evidence of established processes to ensure:

- The CNA includes a thorough analysis of both quantitative and qualitative data in order to identify specific needs for students, staff and/or parents and families
- The CNA process involves all relevant stakeholders, to include: administrators, instructional staff, non-instructional staff, support personnel, parents, families and other community members

Recommended Action(s):

It is important to note that the CNA serves as the basis for which all budgeted costs are determined to be necessary, reasonable, and allocable to the Title I, Part A grant program (as well as to all other ESEA title programs). Consequently, it is recommended the

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district institute the following steps for the development of a more robust annual CNA that clearly articulates the identified needs not only for the FY 2022 ESEA project period, but also for all subsequent ESEA project periods:

- Assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA
- Include more specific and quantifiable details for each identified need. This may be accomplished by providing more exact and specific information regarding each identified need (e.g., target populations, grade levels, performance targets, academic and non-academic outcomes, root causes of the needs, evaluation of prior year outcomes, etc.)
- Ensure the active engagement of parents and families, as well as other community members in the development, implementation, and ongoing monitoring of the CNA
- Incorporate a formal evaluation process as part of the CNA to strengthen the progress monitoring elements (evaluation) required in ESEA

Finding 3:

The district did not provide evidence documenting the date(s) it held the required annual Title I, Part A, meeting for parents and families of participating children. This documentation should include: the meeting agenda, the invitational letter/flyer, meeting minutes and applicable sign-in sheets.

Per the ESEA legislation, a Title I-funded school must convene an annual meeting on a date at the beginning of the school year. The purpose of this meeting is to inform parents and families of the school's Title I, Part A program(s), the Title I, Part A legislative requirements and the ways in which parents, and families, can be actively engaged in helping their children succeed academically.

Citation:

ESEA §1116(c) Parent and Family Engagement: Policy Involvement

Required Action(s):

The district must develop policies and procedures to ensure that its annual, Title I meeting, is held at the beginning of the 2021-2022 school year. A copy of these policies and procedures must be submitted as part of the district's CAP.

Upon holding the annual, 2021-2022 Title I meeting, the district must keep on file the following documentation as evidence of this meeting having been held: the invitational letter/flyer, the meeting agenda, the meeting's minutes and sign-in sheets or a list of staff and parents who attended the meeting. Each piece of documentation must include the exact date on which the district held the required FY 2022 Annual Title I meeting.

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Recommended Action(s):

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended the district administrators and staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Programs at titleone@doe.nj.gov.

Finding 4:

The district did not provide documented evidence that it had a Board approved district-school level policy or that this policy was widely distributed to parents and families. In addition, the district did not provide documented evidence to show how it actively engaged parents and families in the development of the district-school level parent and family engagement policy.

Citation:

ESEA §1116 (a)(2) Local Educational Agency Policy – Written Policy; ESEA §1116(b)(1): School Parent and Family Engagement Policy

Required Action(s):

The district must develop and distribute a Board approved district-school level policy to parents and families at the beginning of the 2021-2022 school year. The district must establish policies and procedures to ensure the district-school level parent and family engagement policy is reviewed and distributed annually and that parents and families are involved actively in its development. Upon issuance of the district-school level parent and family engagement policy the district must maintain the following documentation on file:

- The district-school level parent and family engagement policy that certifies the date on which the policy was instituted
- Information certifying the exact date(s) on which the policy was widely distributed to parents and families
- Information certifying the method(s) by which the district-school level parent and family engagement policy was widely distributed through various mediums to parents and families (i.e., posted to district’s website, contained in student handbook, etc.)
- Information detailing the ways in which the district actively engaged parents and families in the ongoing monitoring and implementation of its district-school level parent and family engagement policy. Per ESEA legislation, parents and families must be involved in the development of the written district-school level parent and family engagement policy, as well as being informed of ways they can further participate in the academic performance and achievement of their children

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As part of the CAP the district must submit a copy of its policies and procedures regarding the annual review and distribution of the district-school level parent and family engagement policy.

Finding 5:

The district did not provide evidence that it had a Board approved school-parent compact, that parents and families were involved actively in the development of the compact, or how the district widely distributed the compact to parents and families. Per ESEA legislation, the school-parent compact must outline how parents, the entire district staff, and students will share the responsibility for improved student academic achievement and the means by which the district and parents will build and develop a partnership to help children achieve the challenging, State academic standards. The exclusion of parents and families in the development of the school-parent compact resulted in these stakeholders being excluded from active participation in their children's educational programs.

Citation:

ESEA §1116(d)(2): Parent and Family Engagement (Shared responsibilities for High Student Academic Achievement)

Required Action(s):

The district must develop and distribute a Board approved school-parent compact at the beginning of the 2021-2022 school year. The district must establish policies and procedures to ensure the school-parent compact is reviewed and distributed annually and that parents and families are actively involved in the ongoing monitoring and continued development and implementation of all elements of the school-parent compact.

The development and distribution of a school-parent compact must:

- Describe the school's responsibility to provide high-quality curriculum and instruction. This is to be done in a supportive and effective learning environment that enables the children served to meet State academic standards. It must further provide the ways in which each parent will be responsible for supporting their children's learning, volunteering in their child's classroom and participating, as appropriate, in decisions relating to the education of their children and the positive use of extracurricular time.
- Address the importance of communication between teachers and parents on an ongoing basis through:
 - Parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement
 - Frequent reports to parents on their children's progress
 - Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities

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- Ensuring regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand

As part of the CAP the district must submit a copy of its policies and procedures regarding the annual review and distribution of the school-parent compact and the active involvement of parents in the monitoring, development, and implementation of the school-parent compact.

Finding 6:

The district did not provide documented evidence the Parents Right-to-Know letter was distributed to parents at the beginning of the 2020-2021 school year. Per ESEA legislation, all districts are required to notify parents at the beginning of each school year of their ‘Right-to-Know’ the professional qualifications of their children’s classroom teachers and paraprofessionals. Parents may request, and the district will provide, information regarding the professional qualifications of the student’s classroom teachers. including:

- Upon such request the district shall provide the following information regarding the student’s teacher(s):
 - That the teacher has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction
 - (If applicable) that the teacher is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived
 - That the teacher is teaching in his/her certificated field of discipline
 - If the child is provided services by paraprofessionals, the district will provided the qualifications of those paraprofessionals

Citation:

ESEA §1112(e)(1)(A) Parents Right to Know – Information for Parents

Required Action(s):

At the beginning of the 2021-2022 school year, the district must develop and distribute a Title I, Part A Parents Right-to-Know letter on school letterhead that shows the date. The purpose of the letter is to inform parents of their right to request information about the qualifications of their children’s teachers.

The Parents Right-to-Know letter must meet the following requirements:

- Issued in English and other applicable languages that represent languages spoken in the school community
- Issued in an understandable format
- Issued in a timely manner

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The district must develop policies and procedures to ensure that the Parents Right-to-Know letter is distributed annually, at the beginning of each school year. These policies and procedures must be submitted as part of the district's CAP.

Finding 7:

The district did not provide documented evidence that the Title I, Part A parental notification letter informing parents of their child's eligibility for services was distributed in English and other languages representative of those spoken in the school community.

Per ESEA legislation, the parental notification letter regarding children's eligibility for services should be sent after the student selection process is completed and must include the Title I A entrance and exit criteria for the parent's child(ren). Additionally, the parental notification letter must be distributed in multiple languages and in an understandable format.

Citation:

ESEA §1116(c)(4) Parent and Family Engagement – Policy Involvement

Required Action(s):

At the beginning of the 2021-2022 school year, the district must distribute a Title I, Part A parental notification letter on school letterhead that shows the date regarding the student's eligibility for services. The letter should also provide that there is the option for parents to refuse Title I, Part A services for their children.

In the letter, the district may provide contact information for district staff member(s) so that parent(s) may contact district staff if they would like to discuss their decision to refuse Title I, Part A services.

If a parent does refuse services the parent's signature must be kept on file by the district.

The district must establish policies and procedures to ensure the annual distribution of the parent notification letter regarding student eligibility for services. These policies and procedures must be submitted as part of the district's CAP.

Finding 8:

The district did not provide documented evidence regarding the Educational Stability policies and procedures enacted under ESEA as follows:

- The name of the staff member who serves as the Educational Stability Coordinator
- In the district's FY 2021 ESEA Consolidated Subgrant Application, the required upload of a current Board approved copy of its written transportation procedures to 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

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- The district’s Educational Stability policies were not in effect as of December 10, 2016 (per ESEA legislation). Rather, the policies presented were adopted on January 23, 2017
- The policies did not reflect the correct requirements as articulated in ESEA legislation

Citations:

ESEA §1112 Educational Stability for Children in Foster Care; ESEA §1112(c)(5)(B) Assurances – Written Policies and Procedures

Required Action(s):

The district must immediately develop Educational Stability for Children in Foster Care policies and procedures, which were to be in place as of December 10, 2016. These policies and procedures must be reviewed and approved annually by the Board of Education. The district must upload to its FY 2022 ESEA Consolidated Subgrant Application a Board approved copy of its written transportation procedures to 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. The Educational Stability for Children in Foster Care policies and procedures must be submitted as part of the district’s CAP.

Recommended Action(s):

The district is encouraged to access the NJDOE website [Educational Stability for Children in Foster Care](#) for specific information regarding the establishment of its Educational Stability policies and procedures and share this information with all staff members.

Finding 9:

The district did not provide documented evidence that it met the Title I, Part A requirements for equitable services with nonpublic schools. It appeared there were nonpublic schools outside the district’s boundaries that provided educational services to Estell Manor resident students. Based on established entrance criteria, these students would have been eligible for Title I-funded service but did not receive these mandated services during the 2020-2021 school year.

Citation:

ESEA §1117 Participation of Children Enrolled in Private Schools; ESEA §8501 Participation by Private School Children and Teachers

Required Action(s):

The district must develop and implement policies and procedures for the 2021-2022 school year, to ensure it meets all ESEA legislative requirements regarding equitable services for nonpublic school students. These nonpublic school policies and procedures must be submitted as part of the district’s CAP.

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For the 2021-2022 school year, the district must contact nonpublic schools both inside and outside the district's boundaries to initiate consultation for equitable services that must begin at the start of the FY 2022 ESEA project period. The district can identify nonpublic schools outside its boundaries by reviewing district data (i.e., Aid-in Lieu report, Transportation Summary report) that identify students in the district's Title I-Part A attendance area(s), who attend nonpublic schools beyond the district's boundaries [ESEA section 1117(a)(4)(A) and (c)(1)]. The district must send these nonpublic schools consultation letters to initiate ongoing, timely, and meaningful consultation for equitable, Title I, Part A services. The district must maintain copies of these letters on file, as well as the agenda, meeting minutes, and sign-in sheets or lists of attendees to document the initial consultation meeting. For more specific information and access to all nonpublic school forms and templates, the district must view the [ESSA Nonpublic Toolkit](#).

Finding 10:

The district did not provide the required time and activity reports or teachers' schedules for two teachers, who were to work in an extended day/year program. The amount of Title I, Part A funds budgeted for the salaries and benefits of these two teachers totaled \$48,801. Without the required time and activity reports or teachers' schedules, it was impossible to determine whether these two teachers' positions were allowable under the Title I, Part A grant program. Documentation of time and activity reports must reflect what Title I-funded staff are doing, when and where they are working, and must match the staff member's funded percentage of time providing the Title I-funded services. This documentation is necessary to verify that Title I-funded staff are performing allowable Title I, Part A activities.

Citation:

2 CFR §200.430 Cost Principles: Subpart E (Compensation – personal services)

Required Action(s):

The district must establish policies and procedures as part of its Standard Operating Procedures to ensure ALL staff funded with Title I, Part A monies complete and submit the required time and activity reports, as well as maintain corresponding schedules to show the amount of time these individuals spend providing Title I, Part A funded services to the identified, academically at-risk students. These policies and procedures must be submitted as part of the district's CAP.

Recommended Action(s):

It is recommended that both program and fiscal staff work collaboratively to establish a mechanism that ensures all Title I, Part A budgeted salary costs accurately reflect the total number of Title I-funded staff members in all future, ESEA Consolidated Subgrant Applications.

Finding 11:

The district did not provide documented evidence to support the amount of \$6,366 in Title I, Part A funds budgeted for an outside consultant to provide technical and professional services to teachers. The district did not provide applicable quotes, purchase orders, and invoices to demonstrate that an outside consultant actually provided professional development and training

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to the Title I-funded teachers. Without this documentation, it was impossible to determine which teachers were to be provided the professional development and training or whether the associated costs were allowable under Title I, Part A.

Citation:

2 CFR §200.318 General Procurement Standards; §200.320 Methods of Procurement to be Followed; §200.404 and §200.405 Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)

Required Action(s):

The district must establish policies and procedures as part of its Standard Operating Procedures to ensure **all** professional development and/or training services to be funded with Title I, Part A monies are allowable in a targeted assistance program. In addition, policies and procedures must be established to address all required elements of both State and Federal procurement requirements. The district must submit these policies and procedures as part of its CAP.

IDEA Program

Finding 1:

The district did not consistently convene meetings with all required participants at identification meetings for students referred for special education and related services. Specifically, meetings did not include the participation of a school social worker.

Citation:

N.J.A.C 6A:14-2.3(k)1(i-vii), 2(i-x); 3.3(e)

Required Actions:

The district must ensure all identification meetings are conducted with required participants and documentation of participation is maintained in students' records. 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 meeting documentation, including the sign in sheets, for identification meetings conducted between September 2021 and December 2021
- review the oversight procedures

Finding 2:

The district did not ensure child study team participation at the planning conference for students transitioning from an early intervention program to preschool.

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Citation:

N.J.A.C. 6A:14-3.3(e)1

Required Actions:

The district must ensure at least one child study team member attends the planning conference for students transitioning from an early intervention program to preschool and documentation of participation is maintained in students' records.

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 meeting documentation, including the sign in sheets, for transition planning conferences conducted between September 2021 and December 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 special education and related services.

Citation:

N.J.A.C. 6A:14-3.3(e)1

Required Actions:

The district must ensure reevaluations are conducted within three years of the previous classification date for students eligible for special education and related services.

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 eligibility documentation for reevaluations conducted between September 2021 and December 2021 review the oversight procedures.

Finding 4:

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

IEPs for students eligible for special education and related services did not consistently include:

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- courses of study for students turning 14 during the implementation period of the IEP
- documentation of the need for accommodations and modifications in nonacademic and extracurricular activities
- location of related services
- description of the program of adult support provided to students in the general education
- classroom and whether those services will be provided by a certified teacher or a paraprofessional
- IEPs for students eligible for speech language services did not consistently include the location of related services

Citations:

N.J.A.C. 6A:14-3.7(e) 1-17, and (f)

Required Actions:

The district must ensure each IEP contains the required considerations and statements.

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. Additionally, 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 September 2021 and December 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. Specifically, IEPs did not consistently include:

- the supplementary aids and services considered and an explanation of why they are not appropriate
- a comparison of the benefits provided in the general education class and the benefits provided in the special education class

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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 any student 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 20 percent of the school day. 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 citations listed above.

To demonstrate that the district has corrected the specific instances of noncompliance pertaining to specific students, 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 September 2021 and December 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.

Administrative

Finding 1:

The district failed to formally appoint 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.

Finding 2:

A Title IV expenditure for equipment with a cost in excess of \$2,000 was incorrectly charged to supplies in the general ledger.

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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:

As of the date of the monitoring visit, May 11, 2021 the district had not drawn down any of their federal fund allocations.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.305

Required Action:

The district must establish and maintain effective internal control over federal awards that ensures compliance with federal statutes and regulations. It is recommended that federal fund drawdowns be made monthly, but never less than quarterly.

Finding 4:

As of the date of the monitoring visit, May 11, 2021 ESSER funding had not been budgeted in the district's general ledger nor had any of the grant been expended.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.300.

Required Action:

The district should set up the appropriation for the ESSER grant in the general ledger. In addition, the district should implement a plan to expend the funds in accordance with the grant's terms.

Recommendation 1:

The district does not have a purchasing manual that details procedures for the procurement of goods and services.

Citations:

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.

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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.