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Bridgeton City School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
July 2021

District: Bridgeton City School District
County: Cumberland
Dates Monitored: May 4, 5 and 6, 2021
Case #: CM-14-21

Funding Sources

Program	Funding Award
Title I, Part A	\$3,899,186
Title I SIA	401,922
Title II	503,085
Title III	304,818
Title III Immigrant	42,489
Title IV	481,541
IDEA Basic	1,844,489
IDEA Preschool	70,887
ESSER	2,659,354
Perkins V	64,555
Total Funds	<u><u>\$10,272,326</u></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 Bridgeton City 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 visit included: staff interviews and document and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title I SIA; Title II, Title III, Title III immigrant; Elementary & Secondary School Emergency Relief Fund (ESSER); IDEA Basic and Preschool and the Perkins V grant for the period July 1, 2020 through 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 SIA; Title II, Title III, Title III Immigrant; Title IV; ESSER; IDEA Basic and Preschool and the Perkins V grant from July 1, 2020 through 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 district is using its Title I, Part A funds to implement schoolwide programs in **all of** its schools. Primarily, the district is providing supplemental instructional opportunities through in-class support and extended year programs. The district is also using Title I funds to support increased use of technology and parent and family engagement programs.

Title I - SIA Projects

The Title I – SIA funds are budgeted for extended-day/year programs, professional development and supplemental instructional materials and supplies, including technology.

Title IIA Projects

The district uses Title IIA funds for class size reduction, professional development across the curriculum and teacher recruitment, particularly in the PreK–2 grade span.

Title III Projects

The district uses Title III funds for supplies, materials, salaries, professional development, and parent events.

Title III Immigrant Projects

The district uses Title III Immigrant funds for tutorials, salaries, parent support, supplies, and professional and technical services.

Title IVA Projects

The district uses Title IVA funds for robotics and STEM activities, walkie talkies for security, anti-bullying and trauma-informed programs, and professional development concerning the use of technology in remote learning.

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IDEA Grant

The majority of the FY 2020 IDEA basic and preschool funds are being used to reduce district tuition costs for students receiving special educational services in approved private schools for students with disabilities. IDEA funds are also being used for supplies and materials to support students with disabilities in the classroom. The nonpublic funds are used to provide supplemental instruction and related services to students with disabilities who attend nonpublic schools located within the district. Additionally, 15% of the total IDEA allocation goes toward providing Comprehensive Coordinated Early Intervening Services (CCEIS). The district uses CCEIS funds for a district wide behavior consultant to support general education teachers as well as struggling learners in the general education setting.

There were no findings for the grant.

Perkins V

Funds are used for professional development for engineering teacher, as well as purchase of supplies and technology equipment to meet the needs of staff support.

Detailed Findings and Recommendations

Title I

A review of the Title I grant yielded no findings.

Title I - SIA

Finding 1:

The district did not provide documented evidence that the development of its Annual School Plans (ASPs) for each Title I - SIA funded school involved the participation of parents, community members and students (Per ESEA legislation, if the ASP relates to a secondary school, all relevant stakeholders, including students, must actively participate in the development, implementation, and evaluation of the applicable ASPs) as stakeholders on the ASP planning teams.

Citations:

ESEA §1111(d)(1)(B) and ESEA §1111(d)(2)(B) Schoolwide Improvement Activities

Required Action:

As the district continues to implement and monitor the ASPs for the FY 2022 ESEA project period, parents, community members and students (secondary school) must be included as active participants on the ASP planning teams for each Title I- SIA funded school.

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Title II

A review of the Title II grant yielded no findings.

Title III

A review of the Title III grant yielded no findings.

Title III Immigrant

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

Title IV

A review of the Title IV grant yielded no findings.

IDEA Program

Finding 1:

The district did not consistently provide parents of students eligible for special education and related services notice of a meeting that included all required components. Specifically, notice of meetings of students who are placed in an out of district placement did not indicate all participants.

Citation:

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

Required Action:

The district must provide parents notice of a meeting in writing early enough to ensure they have an opportunity to attend.. To demonstrate correction of noncompliance the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview staff
- review meeting documentation, including invitations, for meetings conducted between October 2021 and January 2022
- review the oversight procedures

Finding 2:

The district did not consistently document required participants were in attendance at identification, annual review, reevaluation planning, eligibility and IEP meetings for students referred and/or eligible for special education and related services.

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Additionally, it was determined during the virtual monitoring that further review of participants at meetings is necessary. A determination could not be made by the monitoring team regarding compliance with general education teacher attendance for out of district students. A determination could not be made because conflicting sign in sheets were presented to monitors for meetings held that reflected a general education teacher present, as well as a general education teacher not present for the same meetings. As a result, an onsite visit is required to further review files of students who attend out of district placements to determine compliance with this area

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 IEP team is maintained in student files. To demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview staff
- review meeting documentation, including sign-in sheets, for meetings conducted between October 2021 and January 2022
- review the oversight procedures
- determine compliance with general education teacher attendance for students placed in an out of district placement

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, including students placed in separate settings, consideration of placement in the least restrictive environment (LRE).

Specifically, IEPs did not consistently include:

- the comparison of the benefits provided in the general education 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

Citations:

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

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Required Action:

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 the general education setting for more than 20 percent of the school day.

To demonstrate correction of the 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 individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students whose IEPs were identified as noncompliant. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

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

- interview staff
- review documentation from IEP meetings held between October 2021 and January 2022
- review the oversight procedures

Perkins V

Finding 1:

The district failed to provide documentation of eligibility for the Health Science Program of Study (POS). Currently, this application is in the Career and Technical Education Data Management System (CTE-DMS) system with a status of, “In Progress” meaning the district is currently working on the Health Science program of study application. This is the only program of study at the district. The Health Science Career Cluster last went through program approval in 2019. This program of study at their district has not been approved since 8/10/2010.

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 21st Century, N.J.A.C. 6A:19 Career and Technical Education and Programs and Standards.

Required Action:

The program of study application currently in the CTE-DMS system must be completed and submitted to the Office of Career Readiness Health Science Career Cluster to review the application and give final approval.

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Recommendation:

The district should keep on file the final career cluster approval letters from the Office of Career Readiness, upload any current articulation agreements, Industry Valued Credentials (IVC's or Apprenticeship information in NJDOE Data Home in NJDOE Homeroom (<https://homerom.state.nj.us/>). The district should contact its NJDOE Program Officer in the Office of Career Readiness for technical assistance.

Finding 2:

The district did not provide a current articulation agreement for the 2020-2021 school year for the Health Science POS.

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 21st Century, N.J.A.C. 6A:19 Career and Technical Education and Programs and Standards.

Required Action:

The district must complete the articulation agreement for the 2020-2021 school year. The articulation agreement 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/them the authority to work in this capacity such as a Dean. The secondary must be the Chief School Administrator/Superintendent.

Recommendations:

The district should upload any current articulation agreements, Industry Valued Credentials (IVC's) or Apprenticeship information in NJDOE Data Home in NJDOE Homeroom (<https://homerom.state.nj.us/>). Click on CTE-DMS 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 3:

The district provided their district-wide professional development (PD) plan/master faculty schedule of professional development and the professional development plan for approved Career and Technical Education (CTE) programs and/or POS staff. However, the district did not provide sufficient evidence of certificates of attendance at workshops and conferences through professional development initiatives as outline in the Comprehensive Local Needs Assessment (CLNA) for CTE teachers related to CTE related training.

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Citation:

Perkins V Act §135(b)(2) 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 21st Century, N.J.A.C. 6A:19 Career and Technical Education and Programs and Standards.

Required Action:

The district must keep accurate records and copies of certificates of completion for workshops and conferences that CTE instructors attend for professional development purposes to ensure staff are meeting requirements. The district must ensure documentation be provided on any training that may have occurred during fiscal year (FY)21 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 4:

The district provided most of the documentation as evidence for both the CLNA advisory meetings and the individual CTE program and/or POS advisory committee meetings. The district provided:

- a partner contact list of individuals and stakeholders
- meeting minutes
- email invitations
- agendas
- thank you emails
- contact advisory committee member list for the required advisory committees for each approved CTE program and/or POS

The district did not provide evidence to support sufficient/full compliance in this section regarding the discussion of planning to transition CTE programs to CTE POS.

Citations:

Perkins V Act §135(b)(2) 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 21st Century, N.J.A.C. 6A:19 Career and Technical Education and Programs and Standards.

Required Action:

During all meetings, whether for the CLNA and/or individual program advisory committee meetings CTE programs and/or POS advisory committee meetings, the district must keep accurate meeting minutes and discuss all necessary topics to meet the required planning purposes of Perkins V legislation to assist in meeting all the requirements and fulfilling the gaps and disparities outlined in the CLNA. The district should contact its NJDOE program officer in the Office of Career Readiness for technical assistance.

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Finding 5:

The district provided no evidence to verify the implementation of any type of work-based learning (WBL) activities and experiences for FY 2020-2021, such as a simulated workplace experience that provide an immersive experience in a protected education settings that replicates work place tools, processes and/or environment for all students enrolled in approved Career and Technology Education (CTE) programs. However, the district submitted as support documentation an undated memo that referenced the Pandemic/Covid19 as justification as to why there was no implementation of WBL activities and experience opportunities offered to students in approved CTE programs.

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 21st Century Act, N.J.A.C. 6A:19 Career and Technical Education Programs and Standards and Sub Chapter, N.J.A.C. 6A:8 Standards and Assessment.

Required Action:

The district must ensure, moving forward, evidence of implementation of WBL activities and experience. The district should contact its NJDOE Program Officer and WBL State Coordinator in the Office of Career Readiness for technical assistance.

Recommendation:

The district should review New Jersey Safe Schools Program (NJSSP) or CTE students regarding work-based learning opportunity that could be offered to CTE students in approved CTE programs and other applicable WBL information on the [Structured Learning Experiences Administrative Code, Statutes, and Regulations](http://www.nj.gov/education/cte/sle/code.html) webpage: [nj.gov/education/cte/sle/code.html](http://www.nj.gov/education/cte/sle/code.html).

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.

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Finding 2:

The district did not comply with all required timekeeping standards for federally funded grants. Employees with 100 percent of their salaries, paid with federal funds, must complete a semi-annual certification attesting to their performance of grant related duties. Employees with less than 100 percent of their salaries, paid with federal funds must complete monthly personal activity reports.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.302

Required Action:

The district must enhance their personal activity reports for federally funded employees to comply with the required format.

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.