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Atlantic City School District

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New Jersey K to 12 Education

Collaborative Monitoring Report July 2022

District: Atlantic City School District

County: Atlantic

Dates Monitored: April 26, 27, 28 and 29, 2022

Case Number: CM-05-22

Funding Sources:

Program	Funding Award	
Title I, Part A	7,596,719	
Title I SIA	2,473,402	
Title II, Part A	587,202	
Title III	303,353	
Title III Immigrant	71,540	
Title IV, Part A	715,515	
IDEA Part B, Basic and Preschool	2,066,920	
CARES ESSER I	3,977,177	
CRRSA ESSER II (includes all subgrants)	16,343,464	
ARP ESSER (includes all subgrants)	35,721,057	
ARP IDEA Basic and Preschool	430,865	
Perkins V	59,607	
Total Funds	70,346,821	

Background

The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA) and other federal education laws require local education agencies (LEAs - school districts and charter schools) to provide programs and services to schools within their local jurisdiction. The provision of these programs and services is based on the pertinent authorizing statutes specified in each of the federal education laws.

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 subrecipients. 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 Atlantic City School District (ACSD or district) virtually, except where noted, to monitor the district's use of federal funds. The NJDOE also examined 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 requirement of each program, federal and state laws, and applicable regulations. The monitoring of ACSD included staff interviews, as well as, the review of documents and records related to the requirements of these programs:

- Title I, Part A (Title I);
- Title I SIA;
- Title II, Part A (Title II-A);
- Title III;
- Title III Immigrant;
- Title IV, Part A (Title IV-A);
- IDEA Part B Basic and Preschool;
- Coronavirus Aid Relief, and Economic Security Act, Elementary and Secondary School Emergency Relief (ESSER) Fund (CARES ESSER I);
- Coronavirus Response and Relief Supplemental Appropriations ESSER Fund (CRRSA ESSER II) and applicable subgrants;
- American Rescue Plan Act (ARP) ESSER and applicable subgrants; and
- ARP IDEA Basic and Preschool.

The scope of work performed included the review of records and documentation which included:

- accounting records
- annual audits
- board minutes
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

The scope of work performed also included interviews with:

- instructional staff to verify implementation of Individualized Education Programs (IEPs)
- child study team members and speech-language specialists
- the program administrator regarding the IDEA grant

As previously noted, the district expended CARES ESSER I, CRRSA ESSER II and ARP ESSER funds to purchase educational technology. It warrants mentioning that the district ordered 4,500 Chromebooks several months in advance to mitigate supply chain delays. Of these devices, approximately 3,300 are currently unused, pending assignment in the fall of 2022. The department performed a physical inspection of a sample of the devices already placed in service, as well as other equipment, without exception. Moreover, the department will inspect a sample of additional Chromebooks following assignment in the fall or during the corrective action plan (CAP) follow-up process.

Expenditures Reviewed

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic and Preschool, Perkins V, ARP IDEA Basic and Preschool from July 1, 2021 through March 31, 2022. In addition, CARES ESSER I, CRRSA ESSER II, ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through March 31, 2022. A sampling of purchase orders and/or salaries and wages was selected from each program reviewed for examination.

General Overview of Uses of Federal Funds

Title I Projects

The purpose of Title I, Part A is to provide all children with significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. ACSD operates Title I schoolwide programs in all its Title I-funded schools. During the 2021-2022 school year, Title I, Part A funds are used primarily for increased learning time through extended day and year programs. In addition, Title I, Part A funds are being expended for instructional materials and supplies, and professional development. Such funds also have been budgeted for parent and family engagement, STEAM, and social emotional learning.

Title I - SIA Projects

The School Improvement Award (SIA) is allocated to districts with schools identified as needing comprehensive support and improvement (CSI) or targeted support and improvement (TSI). The SIA exclusively supports evidence-based practices, as defined by ESSA, which demonstrate a statistically significant effect on improving student outcomes, as reflected in studies with strong, moderate, or promising evidence of effectiveness. The Title I SIA funds are budgeted in seven of Atlantic City Board of Education's schools (three comprehensive support and improvement and four targeted support and improvement). These funds are used primarily for adaptive software, Social and Emotional Learning programs, salaries for extended day/year programs and math coaches, as well as stipends for leadership teams, data teams, training/professional development, and extended day programs.

Title II-A Projects

The purpose of the Title II, Part A (Title II-A) program is to build systems of support for excellent teaching and learning while increasing student achievement consistent with the challenging State academic standards. ACSD uses Title II-A funds for evidence-based activities and strategies to support effective instruction and leadership to improve student achievement across all schools. Title II-A funds aid in selecting and implementing assessments to evaluate and support teachers, principals and school leaders in English language arts, mathematics, science, and social studies. Finally, professional development programs to promote high-quality instruction and instructional leadership have also been implemented with these funds.

Title III Projects

The purpose of the Title III program is to improve the education of English learners (ELs) by helping them learn English and meet challenging state academic content and student academic achievement standards. ACSD uses its Title III funds to enhance instructional efficacy and effectiveness for students identified as ELs.

Title III Immigrant Projects

The purpose of Title III Immigrant funds is to provide enhanced instructional opportunities for immigrant students and their families. ACSD uses its Title III Immigrant funds to support the transition of new immigrant families into the U.S. school experience, including providing "newcomer" tool kits, extended learning opportunities, and resources and mentor for families to navigate and acclimate to their new life experience.

Title IV Projects

Title IV, Part A (Title IV-A) funds are used primarily to provide all students with access to a well-rounded education, improve school conditions for student learning, and incorporate the use of technology to improve the academic and digital literacy of all students. ACSD uses Title IV-A funds for student support by providing visual and performing arts education. The district believes the arts are a gateway for academic success. Professional development programs to train teachers on ways to use various technology programs for effective instruction in the classroom are implemented with Title IV-A funds.

IDEA Grant

The purpose of the IDEA grant is to provide federal entitlement funds to assist with the excess costs of providing special education and related services to students with disabilities. The IDEA Basic funds are used to reduce district tuition costs for students receiving special education services in approved private schools for students with disabilities, as well as the purchase of instructional supplies for students with disabilities. Nonpublic allocations are used for teacher assistants and supplemental services. The preschool allocation is used for the purchase of instructional supplies.

Perkins V

Perkins V is a federal education program that invests in secondary and postsecondary career and technical education (CTE) programs. It is dedicated to increasing learner access to high-quality CTE programs of study with a focus on program improvement; alignment across grades 5–12, postsecondary and workforce; and economic development.

The FY 2022 Perkins V funds at Atlantic City H.S. to operate Perkins V federally funded programs and programs of study (POS) offered to students participating in Career and Technical Education (CTE). In particular, the NJDOE Office of Career Readiness (OCR) approved the district to operate a program and POS under the following Classification of Instructional Program (CIP) Codes:

Program		CIP	OCR Approval
or POS	Name	Code	Date
POS	Radio & Television	090701	3/10/2022
POS	Radio & Television Broadcasting Technology/Technician	100202	3/14/2022
POS	Cooking and Related Culinary Arts General	120500	4/12/2022
Program	Apparel and Textiles /General	190901	2/18/2020

In addition, the district has current, Dual Credit Articulation Agreements with Atlantic Cape Community College that lists multiple CTE academic, dual courses.

CARES ESSER I

The purpose of the CARES ESSER I funding is to address the impact COVID-19 has had, and continues to have, on elementary and secondary schools. The public schools CARES ESSER I allocation is being used for personal protective equipment (PPE), cleaning and sanitization supplies, protective shields, educational technology such as Chromebooks and related warranties and software licenses, supplies and technology for support staff and digitization of records. The nonpublic school allocation is budgeted primarily for support services.

CRRSA ESSER II

The purpose of CRRSA ESSER II funding is to provide money to LEAs to assist in safely reopening schools, measuring and effectively addressing significant learning loss, and testing, repairing, and upgrading projects to improve air quality in buildings. CRRSA ESSER II funds are being spent for education technology such as Chromebooks and related warranties, MacBooks with Apple Care, iPADs and Smart TVs, digital creative curriculum cloud, PPE and professional development.

ARP ESSER

The purpose of ARP ESSER funding is to assist LEAs in preparing for and responding to the impact of COVID-19 on educators, students, and families. Additional uses of funds include, but are not limited to:

- 1. hiring new staff and avoiding layoffs; and
- 2. addressing learning loss through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs.

ARP ESSER funds are being primarily used for education technology such as Chromebooks and software, mobile carts for computing devices and projectors, behavioral consultant services, PPE and professional development consultants. Funds are also budgeted for improving school building conditions, interventions to address learning loss, intramural sports and clubs to foster student engagement and health and wellness.

ARP IDEA

ARP IDEA is a supplemental award to the IDEA, Part B funds, intended to support districts in the recovery from the impact of the COVID-19 pandemic, to reopen schools safely and sustain safe operations.

ARP IDEA Basic funds are being used for behavioral consultation services. Funds are also budgeted for adaptive software and instructional supplies. The nonpublic allocation is used for supplies to support interventions. ARP IDEA Preschool funds have been budgeted for professional development consultants.

Detailed Findings and Recommendations

The Detailed Findings and Recommendations are disaggregated into the following sections:

- 1. Multiple Grants Section findings necessitating the reversal of charges for multiple grants due to the lack of adequate supporting documentation;
- 2. Grant Specific Programmatic and Fiscal Section findings directly attributable to the federal awards covered during the monitoring; and
- 3. Administrative Section crosscutting administrative findings may be found in this section.

Multiple Grants Section

There are no findings, which warrant mention in this section.

Grant Specific Programmatic and Section

Title I

Finding 1:

The Annual School Plan (ASP) development teams throughout the district do not consistently include all stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, other community members, and students, when applicable).

Citation(s):

ESEA §1114(b)(2): Schoolwide Programs – Schoolwide Program Plan

Required Action(s):

As part of its CAP, the district must submit evidence of established processes to ensure parents/families and community members, are included on the schoolwide planning team and in the decision-making process for how Title I, Part A funds will be spent in the district.

Recommended Action(s):

The district should provide technical assistance to school-level staff regarding the completion of the ASP, to ensure consistency throughout the district. There were inconsistencies noted during the monitoring visit regarding stakeholder engagement representatives.

Title I SIA

Finding 1:

The LEA did not provide documented evidence that the development of each ASP involved the participation of parents and families (non-staff), and an outside community representative(s) as stakeholders on the Annual School Planning team. Pursuant to ESEA legislation, all relevant stakeholders, including parents and families, outside community members, and secondary students from served high schools, must participate actively in the development of the ASP.

At the time of Collaborative Monitoring, Chelsea Heights E.S., New York Ave. School, Dr. Martin Luther King Jr. School Complex, Pennsylvania Ave. School, Uptown School Complex, Brighton Ave. School, and Atlantic City H.S. did not have the required community member representation. In addition, Uptown School Complex and Brighton Ave. School did not have the required parental representation. LEA and school personnel advised that all CSI and TSI schools will involve parent and community members moving forward and some of the schools have already added these stakeholders to their ASP stakeholder team.

Citation(s):

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

Required Action(s):

The LEA must ensure the participation of parents and families (non-staff), students (secondary school), and community representative(s) as stakeholders on the 2022-2023 ASP planning teams.

Recommended Action(s):

- 1. Ensure SIA funds are used exclusively to support interventions, programs, and improvement activities of strategies that demonstrate a statistically significant effect on improving student outcomes or other relevant outcomes based on:
 - Tier 1 Strong evidence from at least 1 well-designed and well-implemented experimental study;
 - Tier 2 Moderate evidence from at least 1 well-designed and wellimplemented quasi-experimental study; or
 - Tier 3 -Promising evidence from at least 1 well-designed and wellimplemented correlational study with statistical controls for selection bias.

- LEA leadership and school planning teams should continue their collaboration with the Department's regional support team on the development of all components of the 2022-2023 ASP, with particular attention being given to the revised SMART Goals panel. Optimal completion of this section will facilitate better alignment of SIA-funded resources with evidence-based activities, strategies, or programs.
- 3. Ensure when allocating Title I SIA funds for Social Emotional Learning and other school climate programs that there is a clear link to Tier I (Strong), Tier II (Moderate), and/or Tier 3 (Promising) evidence-based research to make certain the costs are "allocable" as required by the Uniform Grant Guidance, 2 C.F.R .§200.405 Allocable costs.
- 4. LEA leadership and school planning teams should continue their collaboration with the department's regional support team to ensure all ASP 2021-2022 panels are in "Complete" status and all Certification panels are in final "Approved" status.
- 5. The SIA/SIA Carryover budget detail in the ASP must align with the SIA/SIA Carryover budget detail in the Title I SIA application in the Electronic Web-Enabled Grant system (EWEG) by function/object code. If there are any SIA/SIA Carryover fiscal compliance findings/recommendations included in this report, they must also be corrected and included in the overall alignment of SIA and SIA Carryover funds in the ASP and Title I SIA application in EWEG.
- 6. It is strongly recommended that sufficient detail be included in the budget "description" section of the Title I SIA application in EWEG which identifies the school(s) utilizing the SIA funds by each function/object code and aligns directly with the ASP budget.

Title II-A

The review of the district's 2021-2022 Title II, Part A programs yielded no findings.

Title III

The review of the district's 2021-2022 Title III program yielded no findings. It is worthy to note the district is implementing exemplary practices to support students who are learning English as a second language. The district is exploring ways in which students will connect to the curriculum through lived experiences and simultaneously earn credits toward graduation requirements.

ACSD is assessing, and more intentionally designing, how the New Jersey Administrative Code permits students to master the standards through individualized experiences, specifically for students identified as ELs and newly arrived immigrants in New Jersey. This effort by the school

district is instrumental to ensure equity in academic success and pathways toward graduation for a student population who has a lower graduation rate throughout the state.

TITLE IV-A

The review of the district's 2021-2022 Title IV, Part A programs yielded no findings.

IDEA Program:

Finding 1:

The district did not consistently provide parents of students referred and/or eligible for special education and related services notice of a meeting that included the purpose of the meeting.

Citation(s):

20 U.S.C. §1414(b)(1) Evaluations, parental consent and reevaluations; 34 C.F.R. §300.304(a) Evaluation procedures and N.J.A.C. 6A:14-2.3(k) Parental consent, notice, participation and meetings

Required Action(s):

The district must provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have an opportunity to attend. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above.

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

- interview staff
- review copies of meeting invites sent to parents between September 2022 and December 2022
- review the oversight procedures

Finding 2:

The district did not consistently obtain written parental consent for students referred and/or eligible for special education and related services. The district did not consistently obtain parental consent prior to conducting assessments as part of an initial evaluation, prior to the implementation of the initial IEP and prior to waiving the three-year reevaluation process.

Citation(s):

N.J.A.C. 6A:14-2.3(a) Parental consent, notice, participation and meetings

Required Action(s):

The district must obtain written parental consent prior to conducting assessments as part of an initial evaluation, prior to implementation of the initial IEP and prior to waiving the three-year reevaluation process. In order to demonstrate correction of noncompliance the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview staff
- review copies of written notice for meetings conducted between September 2022 and December 2022
- review oversight procedures

Finding 3:

The district did not consistently maintain documentation of the description, frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Services (I&RS).

Citation(s):

N.J.A.C. 6A:14-3.3(c) Location, referral and identification

Required Action(s):

The district must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner that the team identifies and maintains documentation of the description, frequency, duration and effectiveness of the interventions. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and I&RS staff and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview I&RS team members and teachers
- review documentation for students who were referred and provided interventions in general education between September 2022 and December 2022
- review oversight procedures

Finding 4:

The district did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for an initial evaluation for students referred for special education

and related services.

Citation(s):

N.J.A.C. 6A:14-2.5(b)6 Protection in evaluation procedures; 3.3(e) Location, referral and identification; and 3.6(b) Determination of eligibility for speech-language services.

Required Action(s):

The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for an initial evaluation. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above.

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

- interview staff
- review documentation from identification meetings conducted between September 2022 and December 2022
- review the oversight procedures

Finding 5:

The district does 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. For students eligible for special education and related services, initial evaluation reports did not consistently contain observations outside of the testing situation or a teacher interview. For students eligible for speech-language services, initial evaluation reports did not consistently contain parent interviews.

Citation(s):

20 U.S.C. §1414(b)(4) and (5) Evaluations, eligibility determinations, individualized education programs, and educational placements; 34 C.F.R. §300.306(c)(i) Determination of eligibility; and N.J.A.C. 6A:14-3.4(f)4(i-vi) Evaluation

Required Action(s):

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.

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

- interview staff
- review initial evaluation reports for students evaluated between September 2022 and December 2022
- review the oversight procedures

Finding 6:

The district does not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining a written educational impact statement from the classroom teacher.

Citation(s):

N.J.A.C. 6A:14-2.5(b)6 Protection in evaluation procedures and 3.6(b) Determination of eligibility for speech-language services

Required Action(s):

The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a written statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above.

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

- interview staff
- review initial evaluation reports for students evaluated between September 2022 and December 2022
- review the oversight procedures

Finding 7:

The district does not consistently document all required considerations and statements in the Individualized Education Programs (IEPs) of students eligible for special education and related services. Specifically, IEPs developed did not consistently document:

- parental concerns
- documentation of measurable goals and objective for social studies, science, occupation therapy and speech therapy
- frequency, location and duration of special education program
- age 14 transition components

Citation(s):

20 U.S.C. §1414(d)(3)(A)(B) IEP team; 34 C.F.R. §300.324(a)(1)(2) Development, review and revision of IEP; and N.J.A.C. 6A:14-3.7(e) 1-17 and (f); Individualized education program

Required Action(s):

The district must ensure each IEP contains required considerations and statements. 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 citations listed above. To demonstrate correction of the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose 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 2022 and December 2022
- 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 8:

The district did not consistently provide students eligible for special education and related services with written notice of graduation containing all required components within required timelines.

Citation(s):

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

Required Action(s):

The district must ensure that parents/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 listed above.

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

- interview staff
- review written notice of graduation provided to students with disabilities who graduated at the conclusion of the 2021-2022 school year
- review the oversight procedures

Finding 9:

The district does not consistently convene meetings with required participants for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

Citation(s):

20 U.S.C. §1414(d)(1)(B) Individualized education program team; 34 C.F.R. §300.321(a) IEP team; and N.J.A.C. 6A:14-2.3(k)1(i-vii), 2(i-x) Procedural Safeguards, and 3.3(e) Location, referral and identification

Required Action(s):

The district must ensure all meetings are conducted with required participants and documentation of participation is maintained in student records. 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.

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

- interview staff
- review meeting documentation, including the sign in sheets, for meetings conducted between September 2022 and December 2022
- review the oversight procedures

Finding 10:

The district does not consistently conduct annual review meetings within required timelines for students eligible for special education and related services.

Citation(s):

N.J.A.C. 6A:14-3.7(i) Individualized education program

Required Action(s):

The district must ensure that IEP meetings are conducted annually or more often if necessary, to review and revise the IEP. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and

develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview staff
- review documentation from annual review meetings conducted between September 2022 and December 2022
- review the oversight procedures

Finding 11:

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

Citation(s):

N.J.A.C. 6A:14-3.3(e) Location, referral and identification

Required Action(s):

The district must ensure at least one child study team member attends planning conferences for students transitioning from an early intervention program to preschool and documentation of that 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 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 2022 and December 2022
- review the oversight procedures

Finding 12:

The district does not have a special education parent advisory group to provide input to the district on issues concerning students with disabilities.

Citation(s):

N.J.A.C. 6A:14-1.2 (h) District eligibility for assistance under IDEA Part B

Required Action(s):

The district must ensure a special education parent advisory group is in place. In order to demonstrate correction of noncompliance, the district must organize and establish a parent advisory group.

A monitor from NJDOE will conduct a site visit to:

- review the list of members of the special education parent advisory group
- review agendas for meetings

Finding 13:

The district does not conduct Child Find activities to locate and identify students age 3 through 21 who may need special education services.

Citation(s):

N.J.A.C. 6A:14-3.3 Location, referral and identification

Required Action(s):

The district must ensure Child Find information is posted and made available to parents throughout the community who may suspect their child is in need of special education services. In order to demonstrate correction of noncompliance, the district must develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

A monitor from NJDOE will conduct a site visit to:

- interview staff
- review child documentation
- review oversight procedures

IDEA Grant

Finding 1:

The district does not consistently document nonpublic IDEA services in Individualized Service Plans (ISP). As a result, it could not be determined whether appropriate services are being provided or whether proper accounting of the expenditure of IDEA funds is occurring.

Citation(s):

34 C.F.R. §300.130 Parentally placed private school children with disabilities

Required Action(s):

IDEA nonpublic services must be listed in the ISPs and documented services must match the services listed in the approved IDEA grant application. The district must develop procedures to ensure ISPs document services provided through IDEA funds. A special education monitor will conduct activities to verify the development and implementation of the procedures.

Perkins V Program

The review of the district's 2021-2022 Perkins V programs yielded no findings.

Perkins V Grant

The review of the district's 2021-2022 Perkins V grant yielded no findings.

CARES ESSER I

A review of the district's CARES ESSER I grant for fiscal years 2020-2021 and 2021-2022 yielded no findings.

CRRSA ESSER II

The review of the district's 2021-2022 CRRSA ESSER II grant and subgrants yielded no findings.

ARP ESSER

The review of the district's 2021-2022 ARP ESSER grant and subgrants yielded no findings.

ARP IDEA

The review of the district's 2021-2022 ARP IDEA grant yielded no findings.

Administrative Section

Finding 1:

The district did not have formal written procedures which address Uniform Grant Guidance requirements, such as:

- determining the allowability of costs in accordance with federal cost principles the and the terms and conditions of the federal award; and
- the mandatory disclosure of all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(7) Financial Management and 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles; and §200.113 Mandatory disclosures

Required Action(s):

The district must implement a process to ensure that appropriations of all federal grants are recorded appropriately in the financial records.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of every finding and implementation of all required actions and recommendations contained in this report.

If you have any questions, please contact Lisa D. McCormick via phone at (609) 376-3608 or via email at lisa.mccormick@doe.nj.gov.