

**State of New Jersey
Department of Education
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Roselle Public Schools

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New Jersey K to 12 Education

**Collaborative Monitoring Report
November 2022**

District: Roselle Public Schools
County: Union
Dates Monitored: July 26, 27, 28 and 29, 2022
Case Number: CM-11-22

Funding Sources:

Program	Funding Award
Title I, Part A	994,586
Title I SIA	0
Title II, Part A	150,743
Title III	97,852
Title III Immigrant	13,411
Title IV, Part A	116,300
IDEA Part B, Basic and Preschool	1,571,178
CARES ESSER I	900,765
CRRSA ESSER II (includes all subgrants)	3,277,997
ARP ESSER (includes all subgrants)	7,674,696
ARP IDEA Basic and Preschool	197,471
Perkins V	7,590
Total Funds	15,002,589

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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 Roselle Public Schools (RPS 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 district'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 requirements of each program, federal and state laws, and applicable regulations. The monitoring of RPS 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 II, Part A (Title II-A);
- Title III;
- Title III Immigrant;
- Title IV, Part A (Title IV-A);
- IDEA Part B - Basic and Preschool;
- Perkins V;
- 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.

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

- 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 grants

In addition, a sampling of computing devices and equipment purchased with federal funds was selected and physically examined without exception.

Expenditures Reviewed

The grants and programs reviewed included Title I, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic and Preschool, Perkins V and ARP IDEA Basic and Preschool from July 1, 2021 through June 28, 2022. In addition, CARES ESSER, CRRSA ESSER II and ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through June 28, 2022. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed.

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.

RPS serves grades PK–12 and operates a schoolwide program in all seven schools with Title I, Part A funds. During the 2021-2022 school year, the district programmed and budgeted its Title I, Part A allocation for activities in the following areas:

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1. in-class support programs;
2. instructional materials and supplies;
3. pull-out programs;
4. extended day/year programs;
5. parent and family engagement;
6. other uses including supplies and uniforms for homeless students; and
7. physical therapy, occupational therapy, and speech therapy for homeless students with section 504 plans.

Title II-A Projects

Title II, Part A (Title II-A) funds are used primarily for building systems of support for excellent teaching and learning while increasing student achievement consistent with the challenging State academic standards. RPS used its Title II-A funds for the reduction of class size by recruiting, hiring, and retaining effective teachers. High-quality personalized professional development and in-service training for school personnel also have been implemented with Title II-A funds.

Title III Projects

The purpose of Title III funds 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. RPS used its Title III funds for supplies, professional development, extended day and summer programs, community/family/parent programs and instructional supplies.

Title III Immigrant Projects

The purpose of Title III Immigrant funds is to provide enhanced instructional opportunities for immigrant students and their families. RPS used its Title III Immigrant funds for instructional supplies.

Title IV-A 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. RPS uses its Title IV-A funds for accelerated learning programs for Science, Technology, Engineering, and Mathematics (STEM). Title IV-A funds were utilized for mentoring and counseling services available to students before or after school.

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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 majority of the FY 2022 IDEA basic and preschool funds were used to reduce district tuition costs for students receiving special educational services in out of district placements. IDEA funds were also used for instructional and classroom supplies, counseling services, and technology for students with disabilities, as well as professional development for staff working with students with disabilities. Finally, IDEA funds were used for two coordinators for child study team and special education services.

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 NJDOE Office of Career Readiness (OCR) approved the district to operate a Program of Study (POS) under the following Classification of Instructional Program (CIP) Code:

Program or POS	Name	CIP Code	OCR Approval Date
POS	CTE POS in Health Services/Allied Health/Health Sciences, General aligned to the Health Science career cluster	51.0000	February 19, 2010

The lack of a contemporaneous OCR Approval Date above is addressed through Perkins V, Finding 1.

The department approved RPS to expend the FY 2022 award primarily for:

1. stipends for CTE Teacher to provide student support aimed at increasing access and equity;
2. end of course assessments for courses taken by students through a dual enrollment program;
3. transportation of students to work-based learning settings; and
4. professional development for high school guidance counselors.

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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.

CARES ESSER I funds were utilized for educational technology such as Chromebooks, iMACs, tablets and mobile hotspots, personal protective equipment, cleaning and sanitizing supplies, telecommunication services, and portable Ultraviolet-C disinfection machines. The district was also approved to expend funds to train staff on how to implement distance learning.

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.

RPS uses CRRSA ESSER II funds for educational technology such as instructional software, student licenses for access to social and emotional learning (SEL), Chromebooks and laptops, portable air cleaning machines, filter replacement sets, mental health and therapy services, and leadership professional development.

In addition, RPS budgeted some of its main allocation for COVID-19 testing and preparedness, SEL programs to support students, hiring a new English as a Second Language Teacher, summer and after school programs for student academic and SEL support. Also, the district budgeted its subgrant funds for student learning acceleration activities, professional development to train faculty and staff on strategies for accelerated instruction and learnings, and mental health support and services.

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.

The ARP ESSER main allocation is used for, among other things, personnel costs relating to professional development of staff in English Language Arts (ELA), Mathematics and Social Studies, summer instructional coaching and SEL lessons, and consultants to perform massage therapy for staff, pet therapy, an equity audit, and instructional coaching. ARP ESSER funds have also been expended for instructional and non-instructional supplies. Most notably, RPS

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has budgeted funds for heating, ventilation, and air conditioner (HVAC) upgrades at Abraham Clark H.S.

At the time of the monitoring, RPS had not allocated any expenditures to the related subgrants in its accounting records.

ARP IDEA

At the time of the monitoring, RPS had not allocated any expenditures to its ARP IDEA Basic and Preschool awards in its accounting records.

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.

Grant Specific Programmatic and Fiscal Section

Title I

Finding 1:

The district provided evidence of its district-level parent and family engagement policy; however, the policy incorrectly referred to Section 1118 of the No Child Left Behind Act (NCLB), rather than Section 1116 of ESEA. It is important for the district to have a policy in place in order to establish expectations and objectives for meaningful parent and family involvement. The content and effectiveness of the policy should be evaluated annually to ensure the academic quality of the district. Pursuant to ESEA legislation, parents and families must be involved in the development of the written district-level parent and family engagement policy, as well as be informed of the ways in which they can further participate in the academic performance and achievement of their children.

Citation(s):

ESEA §1116(a)(2) Local Educational Agency Policy: Written Policy

Required Action(s):

The district must ensure that it reviews and updates its district-level parent and family engagement policy to include all currently applicable ESEA citations. The district must

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submit a copy of the updated district-level parent and family engagement policy with the corrective action plan (CAP), for review by staff in the Office of Supplemental Educational Programs (OSEP). In addition, the district must post the updated district-level parent and family engagement policy on its website.

Recommended Action(s):

To further enhance knowledge regarding policies and procedures related to parent and family engagement, it is recommended that 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 2:

The district provided evidence of its notification to parents and adult students (18 years of age or older) concerning information disclosed to military recruiters, postsecondary institutions, or prospective employers, when requested; however, the notification included incorrect ESEA section citations. Pursuant to ESEA legislation, parents must be notified that districts routinely disclose names, addresses, and telephone numbers to military recruiters, postsecondary institutions, or prospective employers, subject to a parent's request not to disclose such information without prior written consent. The notification must advise parents of how they can opt-out of the public, nonconsensual disclosure of this information and the method and timeline within which to do so.

Citation(s):

ESEA §8528(a)(2) Armed Forces Recruiter Access to Students and Student Recruiting Information: Consent

Required Action(s):

For the FY 2023 school year, the district must distribute the required notification, including accurate ESEA citations, regarding the disclosure of students' names, addresses, and telephone numbers, upon request, to military recruiters, postsecondary institutions, or prospective employers. The dated notification must include details on how parents may opt-out of this public, nonconsensual disclosure of information, as well as the method and timeline within which to do so. The district must submit a copy of the notification with the CAP, for review by staff in OSEP. In addition, the district must post this notification on its website in an easily accessible location.

Finding 3:

The district did not provide documented evidence that the development of its Annual School Plan (ASP) involved the participation of parents and families, outside community representatives, and one or more secondary students as stakeholders on the ASP planning team. Pursuant to ESEA legislation, all relevant stakeholders, including parents and families,

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outside community members, and secondary students, must actively participate in the development, implementation, and evaluation of the school's ASP.

Citation(s):

ESEA §1114(b)(2) Schoolwide Program Plan

Required Action(s):

As the district continues to implement and monitor its ASP throughout the remainder of the FY 2023 ESEA project period, parents and families, outside community members, and one or more secondary students must be included as active participants in the ASP team meetings. The district must submit evidence with its CAP of the active participation of parents and families, outside community members, and one or more secondary students on the ASP planning team.

Recommended Action(s):

It is recommended that the district institute policies and procedures to ensure the active and ongoing involvement of parents and families, outside community representatives, and one or more secondary students in the development, implementation, and evaluation of the school's ASP. These groups bring a perspective to the ASP process that is critical to its ongoing success and ultimately, improved academic achievement for all students. In addition, stakeholder engagement in the ASP process should happen throughout the entire school year, as much as possible, rather than occur in a one-or two-month timeframe. For the 2022-2023 school year, the district must ensure the active and ongoing participation of these representative stakeholder groups in the school's ASP process and institute opportunities for ongoing and regular stakeholder engagement throughout the entire school year.

Finding 4:

The district's policy for the Educational Stability for Children in Foster Care includes incorrect information for the LEA Point of Contact (POC). The policy indicates the name of an employee who no longer is employed by the district.

Citation(s):

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

Required Action(s):

The district must submit a copy of the updated Educational Stability for Children in Foster Care policy with the CAP, for review by staff in OSEP. In addition, the district must post the updated Educational Stability for Children in Foster Care policy on its website.

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As part of its CAP submission, the district must include a copy of these policies and/or procedures to delineate how the district will meet the military opt-out notification requirement for the FY 2023 school year. Staff from OSEP will review this information.

Additional Recommendation:

The following recommendation is presented to assist the district in continuing to strengthen and enhance its Title I, Part A programs and services:

Annual School Plan (ASP)

It is recommended the district ensure that its schoolwide schools regularly schedule ASP team meetings, at least quarterly, during the school year. In addition, the principal of each school should review the identified SMART goals in their respective ASP, to ensure they are specific, measurable, attainable, relevant, and time bound. To further enhance knowledge regarding the Annual School Planning process, it is recommended that district administrators and school principals and their staff review the ASP resources available on the [NJDOE ASP website](#).

Finding 5:

The district spent Title I, Part A funds for gaming club purchases totaling \$933.72 (purchase orders 222333 - \$708.72 and 222337 - \$225.00). The expenditures identified do not appear to be consistent with budgeted costs in the district's FY 2022 ESEA Consolidated Grant Application. Further, the district was unable to show a connection to the academic or non-academic needs of students and these costs. Nor was the district able to demonstrate compliance with the applicable Uniform Grant Guidance requirements which stipulate that charges to federal awards must be, among other things:

1. necessary, reasonable, and allocable to the federal award; and
2. adequately documented.

Citation(s):

Uniform Grant Guidance, §200.404 and §200.405 Cost Principles: Subpart E – Reasonable Costs and Allocable Costs

Required Action(s):

The district is required to provide copies of the following documents to the Office of Fiscal Accountability and Compliance (OFAC) through the Collaborative Federal Monitoring (CFM) Homeroom Application:

- an updated general ledger for the period July 1, 2021 through September 30, 2022 which shows the reversal of \$933.72; and
- underlying spreadsheets evidencing exclusion of this amount from the corresponding FY 2022 Final Expenditure Report (FER).

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The district must submit this documentation within thirty (30) days from the date of this ROE. In the event the district has already submitted its FER for review by NJDOE, the district must remit the sum of \$933.72 (refer to the [Schedule of Recoveries Due to SEA](#)) consistent with the same timeframe mentioned.

Finding 6:

The district was asked to provide accounting and payroll records to support the compensation paid to staff members with federal funds. A review of the submitted documentation disclosed the district improperly charged duplicate payroll costs of \$544.51 disbursed to its staff on May 15, 2022.

Pursuant to the Uniform Grant Guidance, charges to federal awards must be, among other things:

1. necessary, reasonable, and allocable to the federal award;
2. adequately documented; and
3. based on records that accurately reflect the work performed.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.430(i) Standards for Documentation of Personnel Expenses and §200.403(g) Factors affecting allowability of costs

Required Action(s):

The district is required to provide copies of the following documents to OFAC through the CFM Homeroom Application:

- an updated general ledger for the period July 1, 2021 through September 30, 2022 which shows the reversal of \$544.51; and
- underlying spreadsheets evidencing exclusion of this amount from the corresponding FY 2022 FER.

The district must submit this documentation within thirty (30) days from the date of this ROE. In the event the district has already submitted its FER for review by NJDOE, the district must remit the sum of \$544.51 (refer to the [Schedule of Recoveries Due to SEA](#)) consistent with the same timeframe mentioned.

Finding 7:

The district spent \$366.76 in Title I, Part A funds for masks and sanitizers (purchase order 223112) to prevent the spread of the COVID-19 among students during its implementation of a Title I summer program. This expenditure is more appropriately allocated to the district's CRRSA ESSER II or ARP ESSER grant.

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Citation(s):

CRRSA Act §313(d) Uses of Funds; ARP Act §2001(e) Uses of Funds; and Uniform Grant Guidance, 2 C.F.R. §200.405(a) Allocable costs

Required Action(s):

Going forward, the district must use its CRRSA ESSER II or ARP ESSER grant funds for the acquisition of supplies to prevent, prepare for, and respond to COVID-19.

Title II-A

Finding 1:

The district budgeted Title II-A funds for salaries and benefits totaling \$86,220.00 for one teacher and selected recruiting, hiring, and retaining effective teachers as the allowable use in the grant application. The board of education (board) meeting minutes submitted for examination reflect approval to fund 100% of S. Robinson's salary with Title II, Part A funds. The district furnished one time and activity report (TAR) for this staff member which covered the entire school year, instead of TARs or semi-annual certifications.

Employees whose salaries are paid 100 percent with federal funds must complete semi-annual certifications attesting to their performance of grant related duties. Employees with less than 100 percent of their salaries, paid with federal funds must complete monthly TARs.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.430(i) Standards for Documentation of Personnel Expenses and §200.403(g) Factors affecting allowability of costs

Required Action(s):

The district must require its employees who are paid, in whole or in part, with federal funds to prepare TARs or certifications twice a year or on a monthly basis, respectively. As part of the CAP process, the district is required to upload copies of the TARs or certifications completed by its Title II-A staff for the 2022-2023 school year through the CFM Homeroom Application.

Title III

The review of the district's 2021-2022 Title III programs yielded no findings.

Title III Immigrant

The review of the district's 2021-2022 Title III Immigrant programs yielded no findings.

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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 conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services and for students referred for speech-language services.

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 that all components of the functional assessment are conducted as part of the initial evaluation process. 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 conducted between February 2023 and May 2023
- review the oversight procedures

Finding 2:

The district did not consistently ensure that all required participants were in attendance at annual review, reevaluation planning, eligibility and IEP meetings for students eligible for special education and related services. Specifically, general education and special education teachers did not consistently participate in meetings.

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) Parental consent, notice, participation and meetings

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Required Action(s):

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. 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 meeting documentation, including sign-in sheets, for meetings conducted between February 2023 and May 2023
- review the oversight procedures

Finding 3:

The district did not consistently document in the IEPs of students removed from the general education setting for more than twenty percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment (LRE). Specifically, the students' IEPs did not consistently include:

- the supplementary aids and services considered and an explanation of why the supplementary aids and services were rejected;
- 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; and
- for students in separate settings, activities to transition the student to a less restrictive environment.

Citation(s):

N.J.A.C. 6A:14-4.2 (a)8(i-iii), N.J.A.C. 6A:14-4.2 (a)4 Placement in the least restrictive environment

Required Action(s):

The district must ensure that when determining the educational placement of a 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 twenty percent of the school day. The district must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document the activities in the student's IEP.

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In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the 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 with IEPs that were identified as noncompliant. Names of the students with noncompliant IEPs will be provided by the special education monitor.

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

- interview staff
- review documentation for students who were provided interventions in general education between December 2022 and May 2023
- review the oversight procedures

Finding 4:

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(s):

N.J.A.C. 6A:14-3.8(a) Reevaluation

Required Action(s):

The district must ensure that reevaluations are conducted within required timelines. 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 of eligibility meetings held as part of the reevaluation process between February 2023 and May 2023
- review the oversight procedures

Finding 5:

The district did not consistently conduct vision and hearing screenings for students referred to the child study team for a special education evaluation.

Citation(s):

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

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Required Action(s):

The district must ensure that vision and audiometric screenings are conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. 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
- including the vision and hearing screenings, for students referred between February 2023 and May 2023
- review the oversight procedures

Finding 6:

The district did not consistently obtain written parental consent prior to the implementation of an initial IEP for students eligible for special education and related services.

Citation(s):

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

Required Action(s):

The district must ensure that prior to implementing an initial IEP, written parental consent is obtained. 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 of initial IEPs developed between February 2023 and May 2023
- review the oversight procedures

Finding 7:

The district did not consistently conduct multidisciplinary initial evaluations for students referred for special education and related services by ensuring the evaluation included at least two assessments conducted by at least two members of the child study team.

Citation(s):

N.J.A.C. 6A:14-3.4(f) Evaluation

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Required Action(s):

The district must ensure that when a student is referred for an initial evaluation for special education and related services, the initial evaluation includes at least two assessments conducted by at least two members of the child study team. 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 of initial evaluations conducted between February 2023 and May 2023
- review the oversight procedures

Finding 8:

The district did not consistently have at least one evaluator at eligibility/IEP meetings who participated in the evaluation process for students referred for special education and related services.

Citation(s):

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

Required Action(s):

The district must ensure that, when conducting eligibility meetings, at least one child study team member who participated in the evaluation is present. 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 of initial evaluations conducted between February 2023 and May 2023
- review the oversight procedures

Perkins V

Finding 1:

The district operates a CTE POS in Health Services/Allied Health/Health Sciences, General CIP 51.0000 (Health Services) at the Abraham Clark H.S. The district was required to complete and

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submit a renewal application to NJDOE requesting approval of this POS on or before June 30, 2015. During the monitoring, NJDOE's CTE Data Management System (CTEDMS) showed the district's application to renew its POS was "In Progress."

Pursuant to N.J.A.C. 6A:19-3.2, an LEA that receives Perkins funds to support a CTE program must meet the requirements of N.J.A.C. 6A:19-3.1 and apply to NJDOE for initial program approval and re-approval every five years. LEAs are informed of their responsibility for monitoring the status of program applications on page 1 of the Perkins Grant Application Guidelines (April 1, 2021).

Citation(s):

N.J.A.C. 6A:19-3.1 Program requirements and N.J.A.C. 6A:19-3.2 Program approval and re-approval

Required Action(s):

The district must complete the application for renewal of its POS, Health Services, within thirty (30) days from the date of this ROE. Specifically, the district's authorized official must log into CTEDMS, select the "Finish" button on the right-hand side of each application section. Once Section 6 is finished, the application status will show "Complete", and the district's authorized official will then be able to submit the application for review by OCR. In the event the district experiences technical issues with CTEDMS, the district should email cte.help@doe.nj.gov for technical assistance.

Recommended Action(s)

The district should establish procedures to review the approval status of all NJDOE approved CTE programs and POS on an annual basis and complete all program applications in a timely manner.

Finding 2:

The district did not submit required documentation for its CTE POS, Health Services, that specifically demonstrates strategies and activities were implemented to prepare special populations with the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency. This lack of documentation prevents a determination as to whether equal access to high-quality CTE courses was available for all CTE students participating in its POS.

Citations(s):

Perkins V Act §134(c)(2)(E) Comprehensive Needs Assessment: Requirements and N.J.A.C. 6A:19-3.3 Programs and services for students with specialized needs

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Required Action(s):

The district must demonstrate implementation of and evidence relating to the following, along with its CAP:

- the development of written procedures that address the provision of accommodations, modifications, and supportive services for all student groups in CTE approved POS;
- a written entry process/coordination plan between CTE program and case manager for special populations; and
- strategies and activities which prepared special populations for high-skill, high-wage or in-demand industry sectors or occupations that will lead to self-sufficiency in its POS, Health Services.

Finding 3:

The district did not provide for examination records evidencing that applicable CTE educators participated in professional development activities aligned with its POS, Health Services.

Citation(s):

New Jersey State Department of Education Comprehensive Local Needs Assessment Guide and Template, pg. 76

Required Action(s):

The district must demonstrate CTE professional development is provided for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals involved with the CTE POS, Health Services. Such evidence consisting of and/or demonstrating the following, must be submitted with the district's CAP:

- the district's implementation of an on-going process to incorporate high-quality professional development for administrators, teachers and counselors, paraprofessionals to addressing gaps and disparities specific to approved CTE programs and/or POS;
- a Professional Development (PD) plan for district staff involved in approved CTE programs and/or POS;
- certificates of attendance by district staff at workshops and conferences; and
- conference or workshop materials for PD offered by LEA (e.g., sign-in sheet(s), agendas, and related conference/workshop materials).

Finding 4:

The district failed to provide evidence of opportunities for student membership in a Career and Technical Student Organization (CTSO), for its CTE POS.

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Citation(s):

N.J.A.C. 6A:19-3.1 (a)(6)(viii) Program requirements

Required Action(s):

As part of the CAP, the district must submit evidence of a CTSO membership agreement through the CFM Homeroom Application.

CARES ESSER I

Finding 1:

The district submitted documentation for its window repair at Abraham Clark H.S. A copy of correspondence evidencing prior written approval of the project by the NJDOE Office of School Facilities was not among the records furnished for examination. Projects of this nature necessitate such authorization and adherence to all other applicable provisions of the Uniform Grant Guidance.

In addition, the district must comply with, among other things:

- all federal regulations regarding construction; and
- applicable federal, state, and local standards and policies (e.g., building codes or specifications for HVAC systems, which may be consistent with standards identified by the EPA, CDC, or World Health Organization).

Citation(s):

Education Department General Administrative Regulations (EDGAR) 34 C.F.R. §§76.600 Where to find construction regulations and 75.600-75.618 Construction; Uniform Grant Guidance, 2 C.F.R. §§200.403 Factors affecting allowability of costs and 200.404 Reasonable costs; 2 C.F.R. §200.439(b)(3) Equipment and other capital expenditures; and N.J.A.C. 6A:26-3.2 School facilities projects

Required Action(s):

The district must submit copies of correspondence submitted to NJDOE by its engineering firm for this project and the resultant correspondence from NJDOE. The required documents must be submitted to OFAC through the CFM Homeroom Application as part of the CAP process.

CRRSA ESSER II

Finding 1:

The district submitted a purchase orders evidencing the expenditure of CRRSA ESSER and other federal funds for various computing devices and electronic equipment, absent a log detailing

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the items acquired. The district must list all equipment items, as well as any electronic devices that are less expensive to track than to replace, on inventory records, which are purchased with federal grant funds until transfer, replacement, or disposition takes place.

Pursuant to the Uniform Grant Guidance, the inventory records must include the following information, at a minimum:

1. Description of the item/property;
2. Serial number, model number, or other identification number (bar code or local identifying number);
3. Funding source of the item/property;
4. Title holder (name of funding title/grant);
5. Acquisition date;
6. Acquisition cost of the item/property;
7. Records showing maintenance procedures to keep item/property in good condition;
8. Percentage of federal participation in the cost of the item/property;
9. Location, use, and condition of the item/property, and date information was reported; and
10. All pertinent information on the ultimate transfer, replacement or disposition (including date of disposal and the sale of the item/property, if applicable) when the item/property is retired from service.

With respect to item 2, LEAs should utilize numbers which correspond directly or that can be referenced, to those recorded on the vendor's shipping or packaging slips in order to facilitate effective:

- Implementation of internal controls over the equipment and computing devices purchased with federal funds; and
- Monitoring and audits.

The district is required to update the inventory listings for new purchases of equipment and computing devices and the purging of items. A physical inventory of equipment item/property must be taken, and the results reconciled with the inventory property records at least once every two (2) years. Any loss, damage, or theft must be investigated and fully documented by local law enforcement officials.

The Uniform Grant Guidance allows the use of equipment no longer needed for the original project program on other activities currently or previously supported by federal funds. Otherwise, the disposition of equipment acquired with federal grant funds must be in accordance with the grant requirements. In the absence of specific instructions of the federal grant, equipment valued at \$5,000 or less may be retained, sold or otherwise disposed of with no further federal obligation.

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Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.313(d) Equipment; §200.403(a) and §200.403(g) Factors affecting allowability of costs; and [Office of Grants Management, General Federal Entitlement Grant Guidance](#)

Required Action(s):

The district is required to submit a report of all computing devices purchased with CRRSA ESSER funds and all other federal awards to OFAC through the CFM Homeroom Application within thirty (30) days from the date of this ROE.

Finding 2:

The district transferred CRRSA ESSER funds totaling \$52,875.00 to line item 400-732, in which zero funds were previously budgeted, without filing an amendment application.

Citation(s):

EDGAR, 34 C.F.R. §76.700 Compliance with the U.S. Constitution, statutes, regulations, stated institutional policies and regulations and [ESSER I, II, and III Funding – Grant Specific Information](#)

Required Action(s):

The district must be sure to file an amendment application to obtain approval for the use of CRRSA ESSER funds in a previously unopened line item or reverse the related appropriation and expenditures. The district must submit records showing this correction to OFAC within (30) days from the date of this ROE.

ARP IDEA

At the time of the monitoring, the district had not allocated any expenditures to its 2021-2022 ARP IDEA Basic and Preschool grants. A review of RPS' expenditures attributable to these grants will be performed in conjunction with the CAP process.

Administrative Section

Finding 1:

The district did not have formal written procedures that address Uniform Grant Guidance requirements including, but not limited to:

- determining the allowability of costs in accordance with federal cost principles, and the terms and conditions of the federal award;
- the mandatory disclosure of all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award; and
- minimizing the time elapsing between the transfer of funds from the department

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and the district's disbursement of payments to vendors for goods and services (cash management or draw-down procedures).

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(6)-(7) Financial Management; 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles; and §200.113 Mandatory disclosures

Required Action(s):

The district must develop and adopt written procedures which address relevant provisions of the Uniform Grant Guidance. The district may opt to utilize a vendor for the preparation of the procedures.

Finding 2:

The amounts appropriated for one or more federal grants in the district's accounting records could not always be reconciled with corresponding amounts awarded in the EWEG system.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302 Financial Management

Required Action(s):

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

Finding 3:

On more than one occasion, 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.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(4) Financial Management and N.J.S.A. 18A:18A(2)(v) Definitions "Purchase Order"

Required Action(s):

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

Finding 4:

The district charged a number of expenditures to incorrect line items (also referred to as expenditure categories). For example, the costs associated with grant administration (100-100) and a virtual field trip (200-500) were recorded under the line items indicated in the

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parentheses. The costs should have been charged to line items 200-100 and 100-300 respectively.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302 Financial Management and UMCOA

Required Action(s):

The district must follow the UMCOA when charging expenditures in the general ledger.

Finding 5:

The district is not submitting reimbursement requests for one or more federal awards on a monthly or at least quarterly basis.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal Payment; [Office of Grants Management, General Federal Entitlement Grant Guidance](#); and [Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

Required Action(s):

The district is required to submit reimbursement requests on a monthly basis, or at least quarterly. In addition, the district is responsible for maintaining supporting documentation for seven (7) years and for making it available to the NJDOE, the United States Department of Education, and/or their authorized representatives upon request.

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.

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Schedule of Recoveries Due to SEA

Finding	Amount
Title I, Finding 4	\$933.72
Title I, Finding 5	544.51
Total	\$1,478.23

Instructions for the district's electronic remittance of this payment will follow under separate cover.