

State of New Jersey  
Department of Education  
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**Logan Township School District**

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New Jersey K to 12 Education

Collaborative Monitoring Report  
May 2023

**District:** Logan Township School District  
**County:** Gloucester  
**Dates Monitored:** March 21, 22, 23 and 24, 2023  
**Case Number:** CM-02-23

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	70,315
Title I SIA	0
Title II, Part A	18,413
Title III	0
Title III Immigrant	0
Title IV, Part A	0
IDEA Part B, Basic and Preschool	252,229
CRRSA ESSER II (includes all subgrants)	344,494
ARP ESSER (includes all subgrants)	828,604
Perkins V	0
<b>Total Funds</b>	<hr/> <b>1,514,055</b> <hr/>

Logan Township School District  
Collaborative Monitoring Report  
May 2023

## **Background**

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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**

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The NJDOE visited the Logan Township School District (LTSD 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 LTSD included staff interviews, as well as the review of documents and records related to the requirements of these programs:

- Title I, Part A;
- Title II, Part A;
- Title IV, Part A;
- IDEA Part B - Basic and Preschool;
- Coronavirus Response and Relief Supplemental Appropriations ESSER Fund (CRRSA ESSER II) and applicable subgrants; and
- American Rescue Plan (ARP) ESSER and applicable subgrants.

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

- accounting records
- annual audits
- board of education (board) meeting minutes
- grant applications program plans and needs assessments
- grant awards

Logan Township School District  
Collaborative Monitoring Report  
May 2023

- 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

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

### **Expenditures Reviewed**

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The grants and programs reviewed included Title I, Title II-A and IDEA Basic and Preschool from July 1, 2022 through February 28, 2023. In addition, CRRSA ESSER II and ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through February 28, 2023. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

### **General Overview of Uses of Federal Funds**

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#### **Title I, Part A Projects**

The purpose of the Title I, Part A program is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Logan Township is a PreK—8 school district and operates targeted assistance programs in its three (3) Title I-funded schools. During the 2022-2023 school year, the district utilizes its Title I, Part A allocation of funds for three Interventionist positions to provide educational services in an in-class instructional support program.

#### **Title II-A Projects**

The purpose of Title II, Part A (Title II-A) is to:

1. increase student achievement consistent with the challenging State academic standards;
2. improve the quality and effectiveness of teachers, principals, and other school leaders;

Logan Township School District  
Collaborative Monitoring Report  
May 2023

3. increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
4. provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

LTSD used their Title II-A funds to reduce class size to a level that is evidence-based. A Classroom Aide was hired to support the teacher and improve student learning.

### **Title IV-A Projects**

LTSD transferred its Title IV, Part A (Title IV-A) funds to its Title I, Part A programs.

### **IDEA**

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 FY 2023 IDEA Basic funds are allocated for tuition for students attending approved private schools for students with disabilities. A preschool classroom aide is also funded through the Basic portion of the grant. Preschool allocations included the purchase of instructional supplies for students with disabilities.

### **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.

LTSD uses its CRRSA ESSER II funds to pay the salaries and employee benefits of a math interventionist and two teachers in full and in part, respectively.

In addition, CRRSA Learning Acceleration (CLA) funds are being used for virtual professional development (PD) sessions and reading and writing subscriptions for district staff and students. CLA funds are also budgeted for summer learning academies for the provision of student instruction in Mathematics and English Language Arts.

CRRSA Mental Health funds are being expended primarily for the salary and benefits of an Art Teacher to help students manage their emotions through art expression and PD.

### **ARP ESSER II**

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:

Logan Township School District  
Collaborative Monitoring Report  
May 2023

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.

LTSD uses its ARP ESSER funds for Classroom Aides, compensation for a Nurse to perform contact tracing, increased transportation costs, subscriptions to online PD, hotspots, and various other instructional supplies. ARP ESSER funds are also budgeted for educational technology, such as smartboards and computing devices, increased transportation costs and other instructional supplies.

ARP ESSER subgrant funds are budgeted for uses including, but not limited to:

1. the salary of an Interventionist to maintain the district's intervention program to address student academic needs, as well their social and emotional needs;
2. a virtual summer school program for student academic support;
3. beyond the school day activities to support students socially and emotionally, such as afterschool clubs focused on various activities; and
4. mental health supports for students through art therapy courses.

## **Detailed Findings and Recommendations**

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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. The programmatic findings precede the fiscal findings unless otherwise denoted by an asterisk (\*).
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 Fiscal Section**

#### **Title I, Part A**

##### **Finding 1:**

The district provided evidence of its district-level parent and family engagement policy; however, it was outdated and contained references to an ESEA citation from the No Child Left Behind Act (NCLB), rather than ESEA (e.g., Section 1118 rather than Section 1116). Under the

Logan Township School District  
Collaborative Monitoring Report  
May 2023

Elementary and Secondary Education Act (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA), ESEA Section 1118 now relates to fiscal requirements and Section 1116 relates to requirements for parent and family engagement.

**Citation(s):**

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

**Required Action(s):**

Annually, the district must actively engage parents and families, along with district representatives, in the ongoing monitoring, implementation, and revision of its district-level parent and family engagement policy. The district must ensure the district-level parent and family engagement policy contains the date on which the policy was board approved, as well as maintain records to show the date on which the policy was widely distributed to parents and families.

In addition, the district must institute processes and procedures for the method(s) by which the policy will be widely distributed through various venues to parents and families (e.g., posted to school's website, contained in student handbook, etc.). As part of the submission of its corrective action plan (CAP), the district must submit a copy of its updated district-level parent and family engagement policy.

**Recommended Action(s):**

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

**Finding 2:**

The district did not provide evidence of a board approved school-level parent and family engagement policy for each Title I-funded school or that each policy was widely distributed to parents and families. In addition, the district did not provide evidence to show how it actively engaged parents and families in the development of each school-level parent and family engagement policy. Pursuant to ESEA legislation, parents and families must be involved in the development of the written school-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. The district currently has one policy covering all schools.

Logan Township School District  
Collaborative Monitoring Report  
May 2023

**Citation(s):**

ESEA §1116(b)(1) Parent and Family Engagement: School Parent and Family Engagement Policy

**Required Action(s):**

The district must ensure that each Title I-funded school has a written school-level parent and family engagement policy that is board approved, annually. These school-level parent and family engagement policies must be developed and reviewed with the active engagement of parents and families, as well as be widely distributed to parents and families on an annual basis. In this way, parents and families are afforded opportunities to become effective partners in the district's ongoing parent involvement process. As part of the submission of its CAP, the district must submit copies of school-level parent and family engagement policies for each Title I-funded school.

**Finding 3:**

The district did not provide evidence of a board approved school-parent compact for each of its Title I-funded schools. In addition, the district did not provide evidence that parents and families were actively involved in the development of each school-parent compact or how each school widely distributed its school-parent compact to parents and families. Pursuant to ESEA legislation, the school-parent compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement. In addition, the school-parent compact must identify the means by which the school and parents will build and develop a partnership to help children achieve the challenging, State academic standards.

**Citation(s):**

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

**Required Action(s):**

The district must ensure it has a board approved school-parent compact in place for each of its Title I-funded schools. In addition, the district must include parents and families in the ongoing monitoring and continued development and implementation of all elements of each board approved school-parent compact. The development and distribution of a school-parent compact must:

1. describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the served children to meet the challenging, State academic standards, and the ways in which each parent will be responsible for supporting their children's learning. The school-parent compact also must detail the ways parents can volunteer in their child's classroom; and participate, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and

Logan Township School District  
Collaborative Monitoring Report  
May 2023

2. address the importance of ongoing communication between teachers and parents through, at a minimum—
  - a. parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement;
  - b. frequent reports to parents on their children’s progress;
  - c. reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities; and
  - d. regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand.

As part of the submission of its CAP, the district must submit copies of the school-parent compacts for each Title I-funded school, as well as a description specifying how it includes parents and families in the ongoing monitoring and continued development and implementation of all elements of the school-parent compacts.

**Finding 4:**

At the time of the monitoring visit, the district reserved one dollar (\$1) of Title I, Part A funds for services to students experiencing homelessness, as articulated on Eligibility Step 4 in the Title I, Part A section of the FY 2023 ESEA Consolidated Subgrant Application. One dollar does not represent a sufficient amount of Title I, Part A funds to reserve to implement services for students experiencing homelessness. Pursuant to ESEA legislation, the Title I, Part A reserve amount should be based on a needs assessment and count of homeless children and should be sufficient in nature to address their unique needs.

**Citation(s):**

ESEA §1113 (c)(3)(A)(i) Allocations: Reservation of Funds

**Required Action(s):**

The district must submit an amendment to its FY 2023 ESEA Consolidated Subgrant Application to reserve a sufficient amount of Title I, Part A funds for services to students experiencing homelessness. The district also will need to provide information in the amendment application as follows:

1. an explanation of the methods used to identify specific needs of homeless children and youths;
2. how the Title I Homeless Reserve allocation would be used for services to homeless children and youths; and
3. how the district’s Title I program would be coordinated with the McKinney-Vento program.



Logan Township School District  
Collaborative Monitoring Report  
May 2023

The FY 2023 ESEA Amendment Application must be completed no later than June 30, 2023.

## **Title II-A**

The review of the district's 2022-2023 Title II-A programs yielded no findings.

## **IDEA Program**

### **Finding 1:**

The district did not consistently document in the Individualized Education Programs (IEPs) of students removed from the general education setting for more than twenty (20) percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- a comparison of the benefits provided in the general education class and the benefits provided on the special education class;
- the potentially beneficial or harmful effects which placement in the general education class may have on the student with disabilities or other students in the class; and
- for those students placed in separate settings, district activities to transition the student to a less restrictive environment.

### **Citation(s):**

N.J.A.C. 6A:14-4.2 (a)8(iii) Placement in the least restrictive environment and 3.7(k) Individualized education program

### **Required Action(s):**

The district must ensure that when determining the educational placement of a child with a disability, the Individualized Education Program (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 (20) 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 them in each IEP.

To demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation(s) listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students with IEPs that were

Logan Township School District  
Collaborative Monitoring Report  
May 2023

identified as noncompliant. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor.

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

- interview staff
- review the revised IEPs
- review a random sample of IEPs developed at meetings conducted between September and December 2023
- review the oversight procedures

**Finding 2:**

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

- supports the student may require to participate in extracurricular and nonacademic activities
- age 14 post-school transition components
- the location of the provision of related services
- the frequency and duration of consultative services
- length of school day in IEPs developed for preschool disabled students

IEPs developed for students eligible for speech-language services did not consistently include supports the student may require to participate in extracurricular and nonacademic activities.

**Citation(s):**

N.J.A.C. 6A:14-3.7(e)1-17 Individualized education program

**Required Action(s):**

The district must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students 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.

Logan Township School District  
Collaborative Monitoring Report  
May 2023

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 and December 2023
- review the oversight procedures

**Finding 3:**

The district did 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. Specifically, general education teachers were not consistently in attendance.

**Citation(s):**

N.J.A.C. 6A:14-2.3(k) Parental consent, notice, participation and meetings 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 students' 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 and December 2023
- review the oversight procedures

**Finding 4:**

The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the general education 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 of for speech-language services

Logan Township School District  
Collaborative Monitoring Report  
May 2023

**Required Action(s):**

The district must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. 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 referred for speech-language services whose eligibility meetings were held between September and December 2023
- review the oversight procedures

**Finding 5:**

The district did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and for students referred for speech-language services. Initial evaluation reports did not consistently contain observations in a non-testing setting and teacher interview.

**Citation(s):**

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 citation listed above.

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

- interview staff
- review initial evaluation reports for students evaluated between September and December 2023
- review the oversight procedures

**Finding 6:**

The district did not consistently provide to students beginning at age 14 written invitations to meetings where post-school transition was being discussed.

Logan Township School District  
Collaborative Monitoring Report  
May 2023

**Citation(s):**

N.J.A.C. 6A:14-2.3(k)1(iii) Parental consent, notice, participation and meetings

**Required Action(s):**

The district must ensure that each student with an IEP who is age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. In order to demonstrate correction of noncompliance, the school 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 invitations to IEP meetings to students age 14 and above for meetings conducted between September and December 2023
- review the oversight procedures

**Finding 7:**

The district does not have a written, board approved policy regarding seclusion of a student.

**Citation(s):**

N.J.A.C. 18A:46-13.6 and P.L. 2017, Chapter 291 Use of seclusion techniques on students with disabilities

**Required Action(s)**

The district must develop and adopt a written policy which addresses the requirements of N.J.A.C.18A:46-13.6. In order to demonstrate compliance, the district must conduct training for relevant staff and develop an oversight mechanism to ensure compliance with the requirements the citation listed above.

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

- review the written board approved policy
- review seclusion training materials and attendance
- visit the seclusion area
- review the oversight procedures

**ARP ESSER**

The review of the district's ARP ESSER grant and all applicable subgrants yielded no findings.

Logan Township School District  
Collaborative Monitoring Report  
May 2023

## Administrative Section

### Finding 1:

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions, absent copies of the requisite *written procedures* to implement such policies. Examples include, but are not necessarily limited to:

- determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award; and
- the mandatory disclosure of all violations of Federal criminal law involving fraud (pertinent information relating to fraud follows), bribery, or gratuity violations potentially affecting the Federal award.

Pursuant to ESEA legislation, each recipient of a grant or subgrant under ESEA must display, in a public place, the hotline contact information of the Office of Inspector General of the Department of Education (USDEOIG) so that any individual who observes, detects, or suspects improper use of taxpayer funds can easily report such improper use.

Federal guidance relating to the prevention of fraud is accessible from [USDEOIG Brochures](#); scroll past multiple tables to the Brochures, Flyers & Posters (Download Free) section. Use this link, [For K-12: Preventing Fraud and Corruption in Federal Education \(2021\)](#), to access a video training presentation.

#### Citation(s):

ESEA §9203 Preventing Improper Use of Taxpayer Funds; Uniform Grant Guidance, 2 C.F.R. §§200.302(b)(6)-(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 develop, revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations and references to current legislation, where appropriate. The district may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.

### Finding 2:

On a few occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). State regulations require that a *properly executed* purchase order be issued *prior* to the purchase of goods or the rendering of services.

Logan Township School District  
Collaborative Monitoring Report  
May 2023

**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 3:**

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

Pursuant to the Uniform Grant Guidance, LEAs must minimize the time elapsing between the receipt of funds from NJDOE for reimbursement purposes and the payment of grant expenditures. To this end, the department’s guidance on reimbursement requests authorizes LEAs to claim expenditures that:

1. *have already been paid; or*
2. will be paid within three (3) days of receipt of its reimbursement check.

In order to comply with number 2 above, the district should only request the reimbursement of expenditures for invoices in hand and determined to be accurate.

**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 U.S. 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](mailto:lisa.mccormick@doe.nj.gov) .