

State of New Jersey  
Department of Education  
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**Asbury Park School District**

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New Jersey K to 12 Education

Collaborative Monitoring Report  
April 2024

**District:** Asbury Park School District  
**County:** Monmouth  
**Dates Monitored:** January 9, 10, 11 and 12, 2024  
**Case Number:** CM-03-24

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	1,274,827
Title I SIA	373,600
Title II, Part A	81,076
Title III	46,369
Title III Immigrant	11,595
Title IV, Part A	125,421
IDEA Part B, Basic and Preschool	798,975
ARP ESSER (includes all subgrants)	16,387,787
Perkins V	30,061
<b>Total Funds</b>	<hr/> <b>19,129,711</b> <hr/>

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

## **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 Asbury Park School District (APSD 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 APSD 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, Part A (Title III);
- Title III Immigrant;
- Title IV, Part A (Title IV-A);
- IDEA Part B - Basic and Preschool;
- American Rescue Plan (ARP) ESSER and applicable subgrants; and
- Perkins V.

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

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

- grant awards
- payroll records
- purchase orders

The scope of work also included interviews with appropriate district staff regarding the administration of the aforementioned programs/grants. In addition, a sampling of computing devices and equipment purchased with Federal funds was selected and physically examined without exception.

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic, IDEA Preschool and Perkins V from July 1, 2023 through November 30, 2023. In addition, ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through November 30, 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 Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

APSD is a Pre-K to 12 school district and operates schoolwide programs in its four (4) Title I-funded schools. In FY 2024, the district is utilizing its allocation of Title I funds in the following areas: instructional materials and supplies; increased learning time; parent and family engagement; and supplies for homeless students.

### **Title I SIA Projects**

The School Improvement Award (SIA) is allocated to districts with schools identified as needing comprehensive support and improvement (CSI/CII), targeted support and improvement (TSI), or additional targeted support and improvement (ATSI). 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.

APSD has four (4) ATSI schools in the 2023-2024 school year. District leadership was notified in January 2024 that these four schools would be CSI schools beginning in the 2024-2025 school year. FY 2024 SIA funds are budgeted primarily for:

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

1. professional development;
2. the implementation of credit recovery programs;
3. Positive Behavioral Interventions and Support (PBIS) and Second Step programs; and
4. supplemental instructional materials and supplies to address English Language Arts, Math, Social Emotional and Learning (SEL), and Climate and Culture.

In FY 2024, the district uses SIA funds to purchase instructional materials and budgeted stipends to implement activities beyond the contractual school day, including extended learning programs for students.

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

The purpose of 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;
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.

APSD uses its Title II-A funds to provide high-quality, personalized professional development which includes effective instructional leadership for all educators. Programs to teach children with disabilities and English are also implemented with Title II-A funding.

### **Title III Projects**

The purposes of the Title III, Part A and Title III, Immigrant program include the following:

1. help ensure that multilingual learners (MLs), including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English;
2. assist all English learners, including immigrant children and youth, to achieve high levels in academic subjects so that all MLs can meet the same challenging, State academic standards that all children are expected to meet;
3. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching MLs, including immigrant children and youth;
4. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare MLs,

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

including immigrant children and youth, to enter all English instructional settings;  
and

5. promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of MLs.

**Note:** The term multilingual learner is synonymous with “English learner” or “English language learner.” Sources which are cited from the United States Department of Education may still reference the use of the term English learner or EL. The NJDOE recognizes that multilingual learners may enter New Jersey’s schools with a level of proficiency in a world language other than English. The NJDOE will use “Multilingual Learner” and “ML,” respectively, to shift to asset-based language and honor a student’s primary language.

In FY 2024, APSD uses its Title III funds for Teacher professional development and an extended day program, compensation for a Parent Liaison and supplies.

### **Title III Immigrant Projects**

The purposes of the Title III Immigrant program include:

1. family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children;
2. recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth;
3. provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth;
4. identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds;
5. basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services;
6. other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and
7. activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.

In FY 2024, APSD uses its Title III Immigrant funds for professional development for Teachers of immigrant students and the acquisition of curricular materials for immigrant students.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

## **Title IV-A Projects**

The purpose of Title IV-A is to improve students' academic achievement by increasing the capacity of LEAs to:

1. provide all students with access to a well-rounded education;
2. improve school conditions for student learning; and
3. improve the use of technology in order to improve the academic achievement and digital literacy of all students.

APSD uses its Title IV-A funds primarily for student services supporting social and emotional needs. The district has contracted the YMCA<sup>1</sup> to provide comprehensive support to its students and parents. In addition, the district implemented the iReady computer platform with Title IV-A funding. The platform provides instructional professional development for staff that helps teachers present all students with a path to proficiency and growth in Reading and Mathematics.

## **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 2024 IDEA Basic funds are being used to reduce district tuition costs for students receiving special education services in approved private schools for students with disabilities. Additionally, funds are used for a behavioral consultant, professional services, instructional supplies for special education programs supporting students with disabilities and supplies for child study teams.

Preschool funds are used for supplies for special education classrooms and behavioral consultants to support preschool students with disabilities. Nonpublic allocations are used to provide occupational, physical therapy and supplemental instruction to nonpublic students.

## **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.

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<sup>1</sup> The acronym "YMCA" stands for Young Men's Christian Association.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

APSD uses its ARP ESSER funds mainly for heating, ventilation and air conditioning upgrades at multiple schools and related architectural fees, tuition costs, educational technology such as computing devices and software licenses, and instructional supplies and materials.

ARP ESSER subgrant funds are being used for Teacher stipends for STEAM<sup>2</sup> and after school enrichment programs; coaches and consultants for professional development services; student counseling services; SEL and wellness initiatives for students; and a workplace mentoring program. Also, subgrant funds are budgeted for uses including, but not limited to hiring Teachers for a Summer Academic Club to provide tutoring and credit recovery, an English language learner (ELL) Summer Newcomer Program, and an advance program to address learning loss.

### **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 (POS) with a focus on program improvement and alignment across grades 5–12, postsecondary programs, and workforce and economic development.

The FY 2024 Perkins V funds are being used at Asbury Park H.S. to operate Perkins V POS offered to students participating in CTE. On January 5, 2024, the NJDOE Office of Career Readiness (OCR) approved the district to operate its Engineering, General POS under CIP<sup>3</sup> code 140101.

The district was approved to expend funds to address the following:

1. district disparities or gaps in CTE student performance;
2. stipends for a translator for EL student assessments; a science tutor for CTE students; and personnel to assist with finding work-based learning opportunities, which include supporting students in the middle grades before enrolling and while participating in CTE activities;
3. targeted content professional development to address the Comprehensive Local Needs Assessment (CLNA) and work with specialized populations; and
4. acquisition of instructional supplies/services to allow hands-on experiences for improvement in CTE students' performance.

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<sup>2</sup> The acronym "STEAM" stands for Science, Technology, Engineering, Arts and Mathematics.

<sup>3</sup> The acronym "CIP" stands for under Classification of Instructional Program.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

**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 correction, or the reversal of charges due to the lack of adequate supporting documentation, for multiple grants.
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**

**Title I SIA, Perkins V, ARP ESSER and ARP Mental Health**

**Finding 1:**

A review of the district’s supporting documentation for reimbursement requests (RRs) disclosed a few discrepancies necessitating correction. In particular, the district:

1. inadvertently claimed the same purchase order (PO) twice in a couple of instances;
2. did not properly reduce expenditures by a disbursement adjustment (Disb. Adj.); and
3. claimed expenditures in excess of actual program costs due to clerical error.

Grant	RR Nbr.	PO Nbr.	Vendor	Amount	RR Check Received
Title I SIA	1	24A00513	Project Lead the Way	3,200.00	10/27/23
Perkins V	1	24A00513	Project Lead the Way	3,200.00	2/28/24
ARP ESSER	9	24Y01309	Dell Inc.	29,554.00	9/27/23
ARP ESSER	11	24Y01309	Dell Inc.	29,554.00	12/06/23
ARP Mental Health	5	23D01252	Counselor On (Disb. Adj.)	-2,250.00	7/27/23
ARP Mental Health	7	N/A	N/A	15,901.00	10/27/23

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

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

In addition, the Uniform Grant Guidance provides that 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:



Asbury Park School District  
Collaborative Monitoring Report  
April 2024

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.

Further, the district is required to submit reimbursement requests on a monthly basis particularly for ESSER funding streams. 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.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.305 Federal Payment and 200.400 Factors affecting allowability of costs and [Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#) and [ESSER I, II, and III Funding — Grant Specific Information](#)

**Required Action(s):**

District staff advised they will correct the aforementioned discrepancies by reducing the expenditures:

1. claimed on their next Title I SIA and ARP Mental Health RRs by \$3,200.00 and \$13,651.00 (-\$2,250.00 + \$19,501.00) respectively; and
2. reported on the district's ARP ESSER Final Expenditure Report (FER) by \$29,554.00.

The district is required to submit copies of RR supporting documentation for Perkins V and ARP Mental Health within thirty (30) days following correction of the errors identified. In addition, the district must furnish copies of their accounting records and spreadsheet which details the composition and reconciliation of costs reported on the ARP ESSER FER upon completion.

The aforementioned documentation must be submitted to the Office of Fiscal Accountability and Compliance (OFAC) through the Collaborative Federal Monitoring (CFM) Homeroom Application within the established timeframes. If the district is unable to submit this documentation, the CFM Team Lead will provide the district with specific instructions for the remittance of \$46,405.00 (\$3,200.00 + \$13,651.00 + \$29,554.00) via separate correspondence.

**Title I, Title I SIA, Title IV-A and ARP ESSER**

**Finding 1:**

The district expended Title I, Title I SIA, Title IV-A and ARP ESSER funds to buy equipment, such as a Promethean Board (PB), four televisions and various computing devices. During the

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

monitoring visit, the district did not furnish a copy of a fixed asset equipment which lists, among other items, the PB with a unit cost of \$4,152.59 for examination.

Consistent with NJDOE guidelines, equipment items are any instrument, machine, apparatus, or set of articles that exceeds the capitalization threshold of \$2,000 per unit and meets all of the following criteria:

1. it retains its original shape, appearance, and character with use;
2. it does not lose its identity;
3. it is nonexpendable; that is, if the item is damaged or some of its parts are lost or worn out, it is more feasible to repair the item than to replace it with an entirely new unit; and
4. under normal conditions of use, including reasonable care and maintenance, it can be expected to serve its principal purpose for at least one year.

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.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

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.

**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 must include the PB on its fixed asset report and submit the report to OFAC through the CFM Homeroom Application within thirty (30) days from the date of this report of examination (ROE).

## **Grant Specific Programmatic and Fiscal Section**

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

**Finding 1:**

The district did not provide evidence of a 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 the Elementary and Secondary Education Act<sup>4</sup> (ESEA), 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.

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<sup>4</sup> This Federal education law was reauthorized by the Every Students Succeeds Act on December 10, 2015.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

**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. 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 corrective action plan (CAP), the district must submit copies of school-level parent and family engagement policies for each Title I-funded school.

**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 at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

**Finding 2:**

The district did not provide evidence of a school-parent compact for Asbury Park H.S. In addition, the district did not provide evidence that parents and families were actively involved in the development of the school-parent compact, or how the school widely distributed its school-parent compact to parents and families.

Pursuant to ESEA, the school-parent compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and how 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 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, continued development and implementation of all elements of each board approved school-parent compact. The development and distribution of a school-parent compact must:

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

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
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 a copy of the school-parent compact for Asbury Park H.S., as well as a description specifying how it includes parents and families in the ongoing monitoring, continued development and implementation of all elements of the school-parent compact.

**Finding 3:**

In reviewing the Annual School Plans (ASP) for the district, the following items were noted:

1. In some instances, the stakeholder team members were listed as “TBD.”
2. For the High School, there was no evidence that the required student representative, parent, and community member attended any of the meetings during the year.
3. Instances where the meetings were not held quarterly.

**Citation(s):**

ESEA §1114(b) Schoolwide Programs: Components of a Schoolwide Program

**Required Action(s):**

As part of the submission of its CAP, the district must submit a copy of the processes and/or procedures the LEA established to ensure that for the 2024-2025 school year:

1. The stakeholder team includes all required, representative stakeholder members, including at least one parent (more than one parent is preferable) and an outside

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

community member(s) not affiliated with the school, and that an effort is made to ensure all required stakeholders are present at all meetings; and

2. Meetings are held at different times throughout the year. It is recommended that meetings are held quarterly, at a minimum.

**Recommended Action(s):**

To further enhance knowledge regarding the completion of the ASP, it is recommended the district's administrators and staff review the [ASP Resources page](#) in NJ Homeroom.

**Finding 4:**

The district did not provide documented evidence that it met the Title I requirements for consultation for equitable services with nonpublic schools. The district informed monitors that they do not reach outside of the district's boundaries in an effort to locate resident students.

**Citation(s):**

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

**Required Action(s):**

For the 2024-2025 school year, the district must develop and implement processes and/or procedures to ensure it meets all ESEA legislative requirements regarding equitable services for nonpublic school students. As part of the submission of its CAP, the district must submit evidence of these processes and/or procedures.

For the 2024-2025 school year, the district must contact nonpublic schools both inside and outside the district's boundaries to initiate consultation for equitable services that must begin at the start of the FY 2025 ESEA project period. The district can identify nonpublic schools outside its boundaries by reviewing district data (e.g., Aid-in Lieu report, Transportation Summary report) that identify students in the district's Title I attendance area(s), who attend nonpublic schools beyond the district's boundaries [ESEA §§1117(a)(4)(A) and (c)(1)].

Additionally, the district must send these nonpublic schools consultation letters to initiate ongoing, timely, and meaningful consultation for equitable Title I services. The district must maintain copies of these letters on file, as well as the agenda, meeting minutes, and sign-in sheets or lists of attendees to document the initial consultation meeting. For more specific information and access to all nonpublic school forms and templates, the district should view the [ESSA Nonpublic Toolkit](#).

**Finding 5:**

The district did not provide sufficient evidence of its notification to parents and adult students (18 years of age or older) concerning information disclosed to military recruiters, postsecondary

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

institutions, or prospective employers, when requested. Rather, the district provided board policy 9713 Recruitment by Special Interest Groups in lieu of the information requested.

Pursuant to ESEA legislation, parents must be notified that schools routinely disclose names, addresses, email 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 to 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 2024-2025 school year, the district must develop and implement processes and/or procedures to ensure it meets all ESEA legislative requirements concerning information disclosed to military recruiters, postsecondary institutions, or prospective employers. As part of the submission of its CAP, the district must submit evidence of these processes and/or procedures.

Additionally, for the 2023-2024 project period, the district must distribute the required notification regarding the disclosure of students' names, addresses, email addresses, and telephone numbers, upon request, to military recruiters, postsecondary institutions, or prospective employers. The notification must include information 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 maintain on file a record of parents and students who request to "opt-out" from the nonconsensual disclosure of information. As part of the submission of its CAP, the district must submit a copy and verify distribution of this letter. In addition, the district must post this notification on its website in an easily accessible location.

**Recommendation(s):**

The district must ensure that the local point of contact for the Educational Stability Liaison is the same person identified in district policy 2415.30 Educational Stability for Children in Foster Care, as well as the contact listed in the county district school (CDS) database, and on the district's website. Currently, the person listed is not consistent across all data points.

The fiscal review of the district's 2023-2024 Title I programs yielded findings are addressed more broadly in the Administrative Section.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

**Title I SIA**

**Finding 1:**

The district issued purchase order (PO) #24A00498 to CDW-G in the amount of \$6,986.18 on August 31, 2023 for a Promethean Board and various electronics and accessories. Of this figure, \$2,833.59 was spent for four (4) televisions and one (1) television stand. The district, however, was unable to establish a connection between these items and the implementation of an evidence-based intervention, as required by ESEA legislation.

Pursuant to the Uniform Grant Guidance, charges to Federal awards must be, among other things, necessary, reasonable, and allocable to the Federal award. The use of Title I SIA funds for such purposes is inconsistent with this federal cost principle and therefore, is unallowable. Local funds should be utilized for purchases of this nature.

**Citation(s):**

ESEA §8101(21)(B) Evidence-Based: Definition For Specific Activities Funded Under This Act, Uniform Grant Guidance, 2 C.F.R. §§200.400 Factors affecting allowability of costs and 200.405 Allocability of costs

**Required Action(s):**

The district is required to provide copies of accounting records showing the reallocation of the PO identified for \$2,833.59 from Title I SIA to Fund 11 or Fund 15. Since the district already claimed reimbursement for this expenditure, the district must reduce the sum of actual expenditures claimed on a subsequent RR by \$2,833.59 and furnish copies of the RR supporting documentation evidencing this offset. The required documents must be submitted to OFAC through the CFM Homeroom Application within thirty (30) days from the date of this report of examination (ROE).

**Finding 2:**

APSD did not show evidence of allocating Title I SIA and Title I SIA carryover funds completely and accurately in the ASP budget for 2023-2024<sup>5</sup>. The SIA and SIA Carryover funds allocated in the ASPs are not aligned with the function/object codes of the Title I SIA and SIA carryover funds in the EWEG system. Additionally, when this report was written, \$97,300.00 needed to be allocated in the SIA application in EWEG.

**Citation(s):**

ESEA §1111(d)1(B) Comprehensive Support and Improvement and ESEA §1003(e) School Improvement

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<sup>5</sup> It is noted that the district was delayed in allocating and aligning all funds in the Title I SIA application in the Electronic Web-Enabled Grant (EWEG) system and in the Annual School Plan System (ASPS) due to the timing of the EWEG SIA reallocation module.



Asbury Park School District  
Collaborative Monitoring Report  
April 2024

**Required Action(s):**

- The district must fully complete/amend the 2023-2024 ASPs for schools (as applicable) and reallocate the SIA carryover funds in the Title I SIA portion of the ESEA Consolidated application in EWEG.
- The district must ensure accurate and aligned allocation of all Title I SIA and Title I SIA carry-over funds for schools that need modifications based on the reasons noted above or as a result of any fiscal findings that impact ASP plans.

Any SIA/SIA Carryover fiscal findings/recommendations included in this report and/or any reversed funds or changes to programs due to such fundings, must also be corrected and included in the overall alignment of SIA funds in the ASP in EWEG systems.

- The district must monitor internal controls and address any deficiencies to ensure practices and protocols explicitly align with information presented in the ASPs and the EWEG/SIA application, and that all use of SIA funds is in concurrence with ESEA citations and the NJDOE's most recent guidance on allowable uses.

**Recommendation(s):**

1. The district allotted \$10,000.00 at the High School for guest speakers, supplies, and services. While the research on the use of guest speakers to enhance student engagement is considerable, more research is needed to determine a direct correlation to the improvement of student achievement. A better use of SIA funds would be to apply them to research-based strategies and interventions that show evidence of a strong effect on improving the academic achievement of the target population. However, to ensure that the selection of guest speakers is in alignment with the priority performance needs of the target population, it is recommended that the district adhere to the following criteria:
  - Potential speakers should be vetted with the appropriate district leadership including but not limited to the Superintendent, appropriate academic content Director(s), and the NJDOE Office of Comprehensive Support Regional Support Team Lead.
  - Topics for discussion should be selected for their alignment with programs implemented at the school including Black History Month, SEL Day, Autism Awareness Month, and Teen Pregnancy, as well as with the needs of the target population to enhance and deepen student learning of the NJSLS<sup>6</sup>.
  - Programs that use guest speakers should also have well-designed follow-up activities that align with the curriculum, NJSLS, and the topic(s) addressed by the guest speakers.

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<sup>6</sup> The acronym "NJSLS" stands for New Jersey Student Learning Standards.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

- An evaluation of the speaker whether goals and objectives were met and the impact on student learning and engagement should follow the conclusion of the event. The evaluation or feedback should include student perceptions, and an analysis of subsequent student work to determine if speaker topics strengthened student learning or if areas need improvement.
2. The district budgeted funds for the research-based program, PBIS, to teach and reinforce new skills to increase appropriate behavior and preserve a positive classroom climate. An essential component of the program is using incentives and rewards to recognize students who have achieved a goal for positive behavior. (For example, Bradley Elementary School budgeted \$43,400.00 for PBIS incentive programs.) While SIA funds may be used to purchase incentives, the district needs to ensure that the rewards adhere to the following criteria:
- The total allocation for rewards/incentives cannot exceed 5% of the school's total SIA allocation.
  - Rewards/incentives must be an essential component of a research-based strategy or intervention.
  - Rewards must be given for academic achievement or behavior improvement.
  - They must be educationally relevant and of nominal value.
  - Articles of clothing and other personal items (T-shirts, jackets, caps, pants, backpacks, etc.) cannot be purchased with SIA funds as a reward or incentive.
  - Entertainment, cash rewards, and branded items advertising a product cannot be used as an incentive if purchased with SIA funds.
  - Incentives cannot be purchased with SIA funds if the intent is to reward attendance or to encourage participation in a program.

### **Title II-A**

The review of the district's 2023-2024 Title II-A programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

### **Title III**

The review of the district's 2023-2024 Title III programs yielded no programmatic findings. The fiscal review of these programs resulted in the finding below:

#### **Finding 1:**

The district encumbered PO #24A00576 in the amount of \$12,980.00 for the provision of ELL services to students at Our Lady of Mount Carmel School (OLMCS), a nonpublic school. Of this figure, \$6,160.00 was paid out as of the monitoring visit. Copies of the employee's monthly time records to support the payment for services based on a per diem rate were provided for

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

examination. The documentation, however, lacked mention of the employee's daily start and end times of work.

During the CFM Fiscal Breakout session held on January 10, 2024, the district was advised to require the nonpublic school employee to immediately commence recording the start and end times worked.

Pursuant to the Uniform Grant Guidance, charges to Federal awards for personnel costs 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.

In order to avoid potential monetary findings, timesheets must be prepared by personnel paid on an hourly and per diem basis. Such timesheets must reflect what grant-funded staff are doing, as well as when and where they are working, including start/end times to assess the reasonableness of sums paid. This documentation is necessary to verify that grant funded staff are performing activities allowable under each Federal award.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.430(i) Standards for Documentation of Personnel Expenses, and 200.400 and 403(g) Factors affecting allowability of costs

**Required Action(s):**

The district must submit copies of timesheets to the OFAC for the OLMCS employee or any grant-funded staff member whose compensation is allocated to Title III for the period February through May 2024. The district must upload the required documents for examination via the CFM Homeroom Application by June 30, 2024.

**Title III Immigrant**

The review of the district's 2023-2024 Title III Immigrant programs yielded no programmatic findings and the following Recommended Action(s):

**Recommended Action(s):**

To ensure the quality of data submitted to report students identified as immigrant children and youth, the district should provide training for all program and data entry staff who support immigrant students, including training on the definition of Immigrant as defined in the NJSMART [SID handbook](#), p. 111.

In addition, the district must ensure that all expenses charged to the grant are allowable and distinct from Title III, Part A and Title III Immigrant monies adhere to the supplement, not supplant requirement.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

**Title IV-A**

The review of the district's 2023-2024 Title IV-A programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

**IDEA**

The review of the district's 2023-2024 IDEA programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

**Perkins V**

**Finding 1:**

As of the CFM visit, the district only provided evidence of one of two required CLNA stakeholder consultation meeting.

**Citation(s):**

Perkins V Act §133(d)-(e) Local application for career and technical education programs

**Required Action(s):**

The district must ensure that at least two CLNA stakeholder consultation meetings are conducted during FY 2024. The district is required to consult with stakeholders to obtain their input on the CLNA process, assess community workforce needs, to ensure POS align to local industry needs, relevant standards, curriculum, industry-recognized credentials, and current technologies.

**Finding 2:**

The district did not provide evidence of work-based learning (WBL) activities during FY 2024 for eligible CTE students participating in their Engineering, General POS. Such documentation includes business/agency agreement forms, individualized student learning plan(s), and worksite evaluations.

**Citation(s):**

N.J.A.C. 6A:19-3.1(a)(6)(vii) Program requirements and N.J.A.C. 6A:19-4.1 Requirements of structured learning experiences

**Required Action(s):**

The district must submit evidence of WBL opportunities completed by CTE students participating in its approved POS. Evidence of support documents must be uploaded

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

through the CFM Homeroom Application for review as part of the district's CAP. Moreover, the district must utilize NJ SMART to upload the required WBL data during the applicable reporting window.

**Recommended Action(s):**

For technical assistance, the district is encouraged to contact both its NJDOE OCR Program Officer and the NJDOE Work-Based Learning State Coordinator. The district is also encouraged to review the [New Jersey Department of Education Work-Based Learning Handbook](#).

**Finding 3:**

The district did not provide evidence of their efforts during FY 2024 to increase student achievement in CTE programs through relationships with the local Workforce Development Board (WDB) and other partners. Pursuant to Perkins V legislation, these relationships should be designed to facilitate the process of updating and aligning their POS with skills that are in demand in the State, regional, or local economy.

**Citation(s):**

Perkins V Act §135(b)(5)(A)-(D) Local Uses of Funds: Requirements for Uses of Funds

**Required Action(s):**

The district must submit documentation of activities with the local WDB and other partners, as well as their feedback, which are aimed at increasing the achievement of students participating in CTE programs. The documentation must be uploaded through the CFM Homeroom Application for review as part of the district's CAP.

**Administrative Section**

**Finding 1:**

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions. Copies of the requisite written procedures to implement such policies, however, were not provided for review as requested. 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

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

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. §200.214 Suspension and debarment, 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.

**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:**

A number of purchase order voucher packets were selected and examined during monitoring. The district was unable to provide evidence that bids were obtained for various purchase orders (POs). Examples include PO numbers 24A00088 and 24A00247. These POs exceeded the threshold necessitating bids or quotes in accordance with:

1. the New Jersey Public School Contracts Law (PSCL) and district policy; or
2. procurement standards under Uniform Grant Guidance.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

When the Federal and State legislation and regulations governing procurement are in conflict, the most restrictive prevails. Federal procurement standards do not include all exemptions allowed under the PSCL, specifically, professional services.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.317 - 327 Procurement Standards and N.J.S.A. 18A:18A-37(a) Award of purchases, contracts, or agreements

**Required Action(s):**

The district must adhere to the PSCL or applicable provisions of the Uniform Grant Guidance, whichever is most restrictive, when obtaining goods and services.

**Finding 4:**

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000.00. Such purchase orders meet one of a number of definitions of a covered transaction in 2 C.F.R. §180.220. Before entering into covered transactions, these regulations require the district to determine whether the vendor is not debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The covered transactions tested lacked any indication that verifications of this nature are being performed. Verifications may be accomplished by:

1. checking the SAM Exclusions maintained by the General Services Administration and available at [SAM.gov | Home](https://sam.gov);
2. collecting a certification from the entity; or
3. adding a clause or condition to the covered transaction with that entity (2 C.F.R. section 180.300).

Copies of written evidence demonstrating performance of the requisite verifications must be maintained. In addition to items 1 and 2 above, other examples of evidence include printouts of search results from SAM, imprints from an ink stamp, or Avery labels affixed to purchase orders memorializing performance of this verification.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment

**Required Action(s):**

The district is required to implement procedures to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000.00. In addition, the district must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

Asbury Park School District  
Collaborative Monitoring Report  
April 2024

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).