

**State of New Jersey
Department of Education
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Camden City School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
May 2025

District: Camden City School District
County: Camden
Dates Monitored: February 4, 5, 6 and 7, 2025
Case Number: CM-06-25

Funding Sources:

Program	Funding Award
Title I, Part A	7,989,820
Title I SIA	1,435,400
Title II, Part A	400,634
Title III	176,799
Title III Immigrant	41,061
Title IV, Part A	753,028
IDEA Part B, Basic and Preschool	3,295,041
Perkins V	208,372
Total Funds	14,300,155

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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 Camden City School District (CCSD 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 CCSD 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; and
- Perkins V.

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

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

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- purchase orders

The scope of work also included interviews with appropriate district staff regarding the administration of the aforementioned programs/grants.

Expenditures Reviewed

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic, IDEA Preschool and Perkins V from July 1, 2024 through December 30, 2024. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

General Overview of Used of Federal Funds

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.

CCSD is a PreK–12 school district and operates schoolwide programs in each of its fifteen (15) Title I funded schools. In FY 2025, the district is using its Title I funds for the following:

1. salaries and benefits for family and operations coordinators;
2. salaries and benefits, in part, for certain administrative staff;
3. instructional materials and supplies;
4. increased learning time;
5. extended day/year programs;
6. parent and family engagement activities; and
7. social-emotional learning.

Title I SIA Projects

The School Improvement Award (SIA) is allocated to districts with schools identified as needing comprehensive support and improvement (CSI/CII), targeted support and improvement (TSI), or additional targeted support and improvement (ATSI). SIA is used exclusively for resources that are necessary to implement evidence-based practices, as defined by the Every Student Succeeds Act (ESSA), that demonstrate a statistically significant effect on improving student outcomes, as reflected in studies with strong, moderate, or promising evidence of effectiveness.

CCSD has SIA funds for ten schools designated as CSI/CII and ATSI, and SIA carryover for one school formerly designated as CII. FY 2025 SIA funds are budgeted for resources to implement evidence-based social-emotional learning strategies, climate and culture programs, extended learning opportunities, parent engagement workshops, and professional development.

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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.

CCSD has outlined plans in its FY 2025 ESEA Consolidated Subgrant Application to use Title II-A funds to enhance instruction and leadership, aiming to boost student achievement. The district focuses on evidence-based strategies in English Language Arts and STEM¹ programs by offering job-embedded and data-driven coaching, and professional development for educators.

Title III Projects

The purposes of the Title III, Part A and Title III, Immigrant programs 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, 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.

¹ The acronym “STEM” stands for Science, Technology, Engineering and Mathematics.

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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 2025, CCSD is using its Title III funds for the following:

- Provide stipends for staff to implement summer programs.
- Purchase subscription for ML multi-use data platform.
- Purchase supplies for the ML welcome center.
- Provide supplies for the monthly family meetings.

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 2025, CCSD is using its Title III Immigrant funds for the implementation of a newcomer summer program and family literacy program.

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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.

CCSD has outlined plans in its FY 2025 ESEA Consolidated Subgrant Application to use its Title IV-A funds to improve instruction through technology integration (devices, software, infrastructure), enhanced student/family support (specialists, mental health services, dropout prevention), and well-rounded educational opportunities (supplemental academic programs, visual/performing arts, career counseling).

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. FY 2025 IDEA Basic and Preschool funds are being used to reduce district tuition costs for students receiving special education services in approved private schools for students with disabilities. Additional funds are being used toward the salaries and professional development of staff who provide support to students with disabilities within the district. The nonpublic funds are being used to provide educational support for students with disabilities attending nonpublic schools located within the district.

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 programs of study (POS) at CCSD under the following Classification of Instructional Program (CIP) Codes:

CTE Program Name	CIP Code	OCR Effective Dates as POS
Building Construction Technology	460415	January 4, 2021
Autobody/Collision & Repair Technology/Technician	470603	February 8, 2021
Education, General	130101	February 8, 2021
Entrepreneurship/Entrepreneurial Studies	520701	February 8, 2021

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CTE Program Name	CIP Code	OCR Effective Dates as POS
Sales, Distribution, & Marketing Operations, General Marketing	521801	June 22, 2021
Health Services/Allied Health/Health Sciences	510000	March 14, 2022
Engineering, General	140101	June 20, 2023
Graphic Design	500409	September 19, 2023
Computer Systems Networking and Telecommunications	110901	October 2, 2023
Architectural Drafting and Architectural CAD/CADD	151303	December 29, 2023
Dance	500301	January 5, 2024
Radio & Television	090701	January 11, 2024

The department approved the district to expend the award primarily for:

1. non-instructional compensation;
2. various instructional and non-instructional supplies;
3. textbooks;
4. teacher professional development;
5. institutional affiliations;
6. curriculum/courses;
7. student technical skills assessments;
8. student field trips;
9. student tuition; and
10. site licenses.

The district is expending its FY 2025 Perkins V award in a manner consistent with these approved uses.

Detailed Findings and Recommendations

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.

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Multiple Grants Section

There are no findings which warrant mention in this section.

Grant Specific Programmatic and Fiscal Section

Title I

The review of the district's 2024-2025 Title I programs yielded the following programmatic findings, and a fiscal finding which is addressed more broadly, in the Administrative Section.

Finding 1:

There are inconsistencies in the development of the annual school plans (ASPs) for the district's non-categorized schools. In some instances, members of the schoolwide development teams did not consistently participate in several key meetings throughout the year. Some schools only held one meeting, and documentation throughout the ASPs was duplicated and/or not filled out when providing evidence. Additionally, the budget details did not account for how the schools spent their non-blended Title I funds.

Citation(s):

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

Required Action(s):

As part of the submission of its corrective action plan (CAP), the district must upload evidence of established processes to ensure parents/families and community members are included on the schoolwide planning team and participate in the decision-making process for how Title I funds will be spent.

Recommended Action(s):

The district should provide technical assistance to school-level staff regarding the completion of the ASP, to ensure consistency throughout the LEA.

Finding 2:

The district's 2024-2025 school-parent compact outlined the responsibilities of the parents and the school only. The compact did not include the roles and responsibilities of the students. The exclusion of the student's role and responsibilities did not offer all parties an opportunity to understand the shared responsibilities for student academic achievement.

Citation(s):

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

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Required Action(s):

The district must include the roles and responsibilities of the school, parent, and student in the school-parent compact. As part of the submission of its CAP, the district must provide a copy of its revised school-parent compact to NJDOE.

Title I SIA

The review of the district's 2024-2025 Title I SIA programs yielded the following programmatic recommendation, and a fiscal finding which is addressed more broadly, in the Administrative Section.

Recommendation(s):

FY 2024 SIA carryover was not initially budgeted accurately in all 2024-2025 ASPs. It should be noted that the district had to await the reallocated module in the SIA application in the Electronic Web-Enabled Grant (EWEG) system before it could accurately budget SIA carryover funds in the district's ASP. Once the funds were in EWEG, the district successfully added SIA carryover funds in the ASPs.

Citation(s):

ESEA §1003(e) School Improvement: Application

Recommended Actions(s):

For the remainder of FY 2025, and subsequently for FY 2026, we recommend the district complete the following actions:

- Develop and implement protocols to ensure that all SIA funds, including carryover, are reflected accurately and timely in each school's ASP.
- Continue to ensure that all SIA-funded resources support practices meeting the ESSA evidence-based standards (Strong, Moderate, or Promising) and NJDOE's SIA fiscal guidance document.
- Once the SIA Final Report in EWEG is complete (October 2025), make any necessary revisions to accurately add SIA carryover from FY25 into the FY26 ASPs using the funding source "SIA Carryover." Ensure that all SIA funds in the schools' ASPs align with the SIA funds in the Title I SIA application in the EWEG system.

Title II-A

The review of the district's 2024-2025 Title II-A programs yielded no programmatic findings, and a fiscal finding which is addressed more broadly, in the Administrative Section.

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Title III

The review of the district's 2024-2025 Title III programs yielded the following programmatic findings, and no fiscal findings:

Finding 1:

The district is required to adhere to the implementation of the standardized statewide home language survey (HLS).

Citation(s):

ESEA §3111(b)(2)(A) Formula Grants to States: Use of Fund, ESEA §3113(b)(2) State and Specially Qualified Agency Plans: Contents, ESEA §3115(c)(2) Subgrants to Eligible Entities: Required Subgrantee Activities and ESEA §1111(b)(2)(G) State Plans: Challenging Academic Standards and Academic Assessments

Required Action(s):

As part of the CAP, the district must update the HLS to mirror the statewide standardized HLS; see [Identification of Students as Multilingual Learners](#), Step 1. Questions on the HLS may not be altered and must be read verbatim, if administered verbally. Staff may clarify questions in an unbiased manner (e.g., use a district script, if available), but staff may not prompt or lead the parent to a response. The HLS must be retained in each student's school record, regardless of whether the student is ultimately identified as a ML.

Recommended Action(s):

Any additional questions necessary as part of the identification process can be included as part of the Records Review; see [Identification of Students as Multilingual Learners](#), Step 2. Also references to this student group should be updated from English language learners (ELLs) to MLs.

Finding 2:

The district did not provide evidence of parent notification and placement of MLs in Language Instruction Education Programs (LIEPs) within thirty (30) days.

Citation(s):

ESEA §§1112(e)(3), (e)(3)(A), (e)(3)(A)(viii) and (e)(4) Local Educational Agency Plans: Parents Right-to-Know and ESEA §3113(b)(2) State and Specially Qualified Agency Plans: Contents

Required Action(s):

As part of the submission of its CAP, the district must demonstrate that initial placement letters to parents meet the timeline for notification. Specifically, the district is required to provide a sample of ten (10) letters for students identified in the 2024-2025 school

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year already sent to parents (completed and dated with parent information) in a language comprehensible to them.

Recommendation(s):

The district should request its data vendor add a field, ELPScreenerDate, which is consistent with the new NJSMART data element. In this manner, the timeline for sending initial placement letters is clear from the date the screener is administered.

Finding 3:

The district did not submit evidence of how the LIEP is evaluated and the data used to provide and improve effective LIEPs that meet the needs of MLs.

Citation(s):

ESEA §3115(c) Subgrants to Eligible Entities: Required Subgrantee Activities,
§3111(b)(2)(D)(i) Formula Grants to States: Use of Funds and ESEA §1111(c)(4)(A)(ii)
State Plans: Statewide Accountability System

Required Action(s):

The district must create a protocol and procedure for assessing the effectiveness of the current LIEPs to determine whether the program designs implemented are the most appropriate for the current ML student group to achieve English language proficiency and academic success.

Recommendation(s):

The district may develop a procedure that requires staff to assess and evaluate the performance data of students and create a CAP, as needed, based on the findings from the evaluation. The district can use the statements under the [LIEP Plan Components](#) as a tool for assessing its capacity to support MLs. The district may also reference the [USDE English Learner \(EL\) Toolkit](#) Chapter 9, Evaluating the Effectiveness of a District's EL Program

Finding 4:

The district did not provide evidence of materials in a language comprehensible to the parent (e.g., report cards, progress reports) that are shared with all schools and staff in the district.

Citation(s):

ESEA §3115(a)(1) Subgrants to Eligible Entities: Purposes of Subgrants

Required Action(s):

The LEA must create a district-wide protocol to identify which required materials will be translated for parents who speak and/or read in a language other than English. As part of the CAP, the district must submit evidence of materials distributed to the parents.

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Recommendation(s):

The district is required to share a protocol with all [appropriate] staff regarding a list of required materials that must be provided in a language comprehensible to the parent, along with the steps for staff to accomplish this requirement (e.g., access to interpreter, translation services).

Title III Immigrant

The review of the district's 2024-2025 Title III Immigrant programs yielded the following recommendation, and no programmatic or fiscal findings.

Recommendation(s):

The district has carryover from the previous fiscal year. It is recommended that the district identify programmatic, allowable uses for expending the Title III Immigrant carryover funds.

Title IV-A

The review of the district's 2024-2025 Title IV-A programs yielded no programmatic findings, and fiscal findings which are addressed more broadly, in the Administrative Section.

IDEA

The review of the district's 2024-2025 IDEA programs yielded no programmatic findings, and fiscal findings which are addressed more broadly, in the Administrative Section.

Perkins V

The review of the district's 2024-2025 Perkins V programs yielded no programmatic and fiscal findings which are addressed more broadly, in the Administrative Section.

Administrative Section

Finding 1:

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions. Some of the policies omitted relevant Uniform Grant Guidance (UGG) citations (e.g., district's policy on travel) or lacked mention of pertinent requirements. For example, the district's policy on suspension and debarment does not reference:

- the applicability to contracts or purchase orders over \$25,000 unless the district chooses a lower threshold;
- the System for Award Management (SAM) which is utilized for searching debarred/suspended vendors and is accessible at [SAM.gov | Home](https://sam.gov); and
- the requirement to demonstrate compliance with written evidence.

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Moreover, the district did not submit the following written procedures:

- Mandatory Disclosure procedures which requires, among other things, that the district promptly disclose in writing to the Federal awarding agency or to NJDOE, all violations of Federal criminal law.
- Written cost allowability procedures necessary to implement the district's cost allowability policy. To be compliant, such procedures cannot simply reiterate the Federal requirements or policies or goals.

Rather, the procedures should be robust and clearly identify roles and responsibilities. They should also provide a series of steps to be followed for determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award. Steps that—

- offer a detailed description of activities;
- describe the process used throughout the entire grant life cycle, including the proper submission of applications and amendments in accordance with department instructions; and
- serve as guide and training tool for employees.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §§200.113 Mandatory disclosures, 200.214 Suspension and debarment, 200.302(b)(6)-(7) Financial management, §§200.400 – 200.476 Subpart E - Cost Principles, and 200.475 Travel costs

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:

The district is improperly using the same revenue code, 4411, for Title I and Title I SIA. The district should utilize a distinct revenue code, such as 4412, for Title I SIA.

Citation(s):

The Uniform Minimum Chart of Accounts for New Jersey Public Schools and Approved Private Schools for Students with Disabilities (UMCOA)

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Required Action(s):

The district is required to utilize the UMCOA to ensure the proper recording of revenues and expenditures in its accounting records.

Finding 3:

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 4:

The district is reminded to submit reimbursement requests for its Federal awards on a monthly basis, unless otherwise precluded from doing so pending the review and approval of a related amendment application by NJDOE.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal payment and [NJDOE 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. 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.

Advisory Notice

Preventing Improper Use of Taxpayer Funds

Pursuant to ESEA §9203(1), 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.

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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.

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.