

State of New Jersey  
Department of Education  
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**Stratford School District**

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New Jersey K to 12 Education

Collaborative Monitoring Report  
April 2025

**District:** Stratford School District  
**County:** Camden  
**Dates Monitored:** February 18, 19, 20 and 21, 2025  
**Case Number:** CM-07-25

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	198,891
Title I SIA	0
Title II, Part A	12,310
Title III	18,800
Title III Immigrant	1,252
Title IV, Part A	13,100
IDEA Part B, Basic and Preschool	307,488
Perkins V	0
<b>Total Funds</b>	<hr/> 551,841 <hr/>

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## **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 Stratford School District (SSD 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 SSD included staff interviews, as well as the review of documents and records related to the requirements of these programs:

- Title I, Part A (Title I);
- Title II, Part A (Title II-A);
- Title III, Part A (Title III);
- Title III Immigrant;
- Title IV, Part A (Title IV-A); and
- IDEA Part B - Basic and Preschool.

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
- purchase orders

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

### **Expenditures Reviewed**

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The grants and programs reviewed included Title I, Title II-A, Title III, Title III Immigrant, Title IV-A, and IDEA Basic and Preschool from July 1, 2024 through January 31, 2025. 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**

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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.

SSD is a PreK–8 school district and operates a targeted assistance program in both of its Title I funded schools. In FY 2025, the district is using its Title I funds to support the salaries and benefits of basic skills teachers, and teacher professional development.

#### **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.

SSD has outlined plans in its FY 2025 ESEA Consolidated Subgrant Application to use Title II-A funds to:

1. provide high-quality, personalized professional development;
2. in-service training sessions; and
3. promote high-quality instruction and instructional leadership.

#### **Title III Projects**

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

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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.

**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, SSD is using its Title III funds for the following:

- After school programming to support English growth/acquisition.
- Professional development workshops for English as a Second Language and mainstream staff.
- Family Nights.
- Salary for bus driver to transport ML students to ML summer programming.
- Extended day programming for ML students.
- Instructional supplies and materials for ML students.
- Translation.

### **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;

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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, SSD is using its Title III Immigrant funds for ML Family Nights.

#### **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.

SSD uses its Title IV-A funds for an after-school club that includes mentoring and counseling, and the beginning phase of an electronic sports program. Mentoring and counseling, including an online social and emotional learning program, are also implemented with Title IV-A funding.

#### **IDEA**

The purpose of the IDEA Grant is to provide federal entitlement funds to assist with the excess cost of providing special education and related services to students with disabilities. FY 2025 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. IDEA Preschool funds are being used to pay the salary of a teacher for preschoolers with disabilities.

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## **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**

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 no programmatic findings, and fiscal findings which are addressed below and more broadly, in the Administrative Section.

#### **Finding 1:**

An examination of the district’s Account Analysis for Title I disclosed that teacher salaries were incorrectly recorded under account numbers which lack location or school codes. Expenditures clearly spent at the school-level are required to be recorded at the school-level and those incurred for central administrative functions are recorded at the district-level. The coding and reporting of personnel and non-personnel expenditures impacts the Federal funds used to calculate the per-pupil expenditure figures that must be included on State and local report cards.

Also, unique subcodes are not being used to track the reserve for students experiencing homelessness. Amounts expended for this set-aside must be used for allowable program activities and accounted for separately to enhance the district’s ability to monitor unexpended balances, which may be carried forward, provided the funds are spent for their intended purpose or returned to the state.

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

ESEA §1111(h)(1)(C)(x) State Plans: Reports, Uniform Grant Guidance, 2 C.F.R.  
§200.302(b)(3) Financial management and 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 implement procedures to ensure:

1. the proper recording of expenditures in its accounting records and accuracy of fiscal information used for school level reporting as required under ESEA; and
2. reserves are accounted for separately.

**Title II-A**

The review of the district's 2024-2025 Title II-A programs yielded no programmatic findings or fiscal findings.

**Title III**

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

**Title III Immigrant**

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

**Title IV-A**

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

**IDEA**

The review of the district's 2024-2025 IDEA programs yielded no programmatic finding and a fiscal finding which is 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 citations including, but not necessarily limited to the district's policy on the reimbursement of Federal and other grant expenditures, and travel.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.305 Federal payment and 200.474 Travel

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**Required Action(s):**

The district must revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations, where appropriate. The district may opt to utilize a vendor for the revision of its board policies and procedures.

**Finding 2:**

After notification of its virtual monitoring visit, the district opted not to submit reimbursement requests for a number of grants in the event the department required the reversal of unallowable costs. The district is reminded to submit reimbursement requests on a monthly basis.

**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**

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**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.

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.

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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).