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Weymouth Township School District

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New Jersey K to 12 Education

Collaborative Monitoring Report May 2025

District:	Weymouth Township School District
County:	Atlantic
Dates Monitored:	April 1, 2, 3 and 4, 2025
Case Number:	CM-10-25

Funding Sources:

Program	Funding Award
Title I, Part A Title I SIA Title II, Part A Title III Title III Immigrant Title IV, Part A IDEA Part B, Basic and Preschool Perkins V	52,694 0 5,566 0 10,000 75,739 0
Total Funds	143,999

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 Weymouth Township School District (WTSD 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 WTSD 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 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

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 II-A, Title III, Title IV-A, and IDEA Basic and Preschool from July 1, 2024 through March 4, 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

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.

WTSD is a PreK–8 school district and operates a targeted assistance program its Title I funded school. The district utilizes its FY 2025 Title I funds primarily for instructional staff support using in-class and pull-out methods, as well as instructional materials and supplies.

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.

In FY 2025, WTSD uses its Title II-A funds to provide high-quality professional development across all subject areas, as well as support innovative curriculum initiatives, including the integration of AI-enabled¹ platforms.

Title III Projects

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

¹ "AI" stands for "Artificial Intelligence."

- 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, WTSD did not receive a Title III allocation. Even so, the district is still required to comply with the programmatic requirements of Title III, Part A.

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.

WTSD uses its Title IV-A funds to support the integration of multiple disciplines across the curriculum. These funds have enabled the implementation of the Wonders Science of Reading program, which targets students in need of additional literacy support. Additionally, Title IV-A funding is used to provide contracted services and resources for the school counselor, enhancing the overall support system for students' academic and emotional well-being.

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 Cape May County Special Services School District. IDEA Preschool funds are being used to purchase instructional supplies and classroom furniture for preschool students with disabilities.

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.

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 a fiscal finding which is addressed more broadly, in the Administrative Section.

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.

Title IV-A

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

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.

Administrative Section

Finding 1:

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions. Some of the policies examined lacked mention of Uniform Grant Guidance such as the district's policy on travel.

Moreover, the district did not provide the following board policies and/or written procedures:

- A board policy and written procedures requiring the district to promptly disclose in writing to the Federal awarding agency or NJDOE whenever it has credible evidence of the commission of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in connection with the Federal award (including any activities or subaward thereunder).
- A procedure requiring the district to disclose in writing any potential conflict of interest the district, as a non-Federal entity, has to the Federal awarding agency or NJDOE in accordance with the applicable Federal awarding agency policy.
- 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—

- o 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. §200.112 Conflict of interest, 2 C.F.R. §200.113 Mandatory disclosures, §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 provided a Title I Revenue Report for examination which did not accurately reflect the payments received as reported in the department's Electronic Web-Enabled Grant system and the balance of revenue due.

Citation(s):

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

Required Action(s):

The district must implement a process to ensure the dollar amount of all Federal grants are recorded appropriately in its financial records, including Revenue Reports. As part of the submission of its corrective action plan, the district is required to upload a revised Revenue Report which demonstrates the vendor has made the necessary adjustments to accurately capture all figures contained therein.

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 <u>NJDOE Policies and</u> <u>Procedures for Reimbursement of Federal and Other Grant Expenditures</u>

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.

Federal guidance relating to the prevention of fraud is accessible from <u>USDEOIG Brochures</u>; scroll past multiple tables to the Brochures, Flyers & Posters (Download Free) section. Use this link, <u>For K–12: Preventing Fraud and Corruption in Federal Education (2021)</u>, 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 <u>lisa.mccormick@doe.nj.gov</u>.