

**State of New Jersey
Department of Education
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Byram Township Schools

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New Jersey K to 12 Education

**Collaborative Monitoring Report
August 2025**

District: Byram Township Schools
County: Sussex
Dates Monitored: June 10, 11, 12 and 13, 2025
Case Number: CM-15-25

Funding Sources:

Program	Funding Award
Title I, Part A	34,255
Title I SIA	0
Title II, Part A	12,980
Title III	0
Title III Immigrant	0
Title IV, Part A	10,000
IDEA Part B, Basic and Preschool	211,465
Perkins V	0
Total Funds	<hr/> 268,700 <hr/>

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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 Byram Township Schools (BTS 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 LSS 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.

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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 June 17, 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.

BTS is a K–8 school district and operates a targeted assistance program in both of its Title I funded schools. The district utilizes its FY 2025 Title I funds primarily for an in-class instructional staff support program, 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, BTS uses its Title II-A funds to provide high-quality, personalized professional development (PD) across various subjects, as well as in-service training to enhance the skills and effectiveness of school personnel.

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;

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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, BTS 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.

BTS uses its Title IV-A funds to enhance programs and initiatives that support the well-rounded education of all students. The district leverages Title IV-A funds to provide high-quality, evidence-based PD in Mathematics and English Language Arts. The PD equips educators with the instructional strategies and tools necessary to improve student outcomes, and supports rigorous standards-aligned instruction, providing students with a well-rounded education.

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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 out of district placements. IDEA Preschool funds are being used to cover the costs of related services and evaluations 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 the programmatic findings below and a fiscal finding which is addressed more broadly, in the Administrative Section.

Finding 1:

The district did not provide documented evidence it conducted a comprehensive needs assessment (CNA) that included the active participation of all representative stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, outside community members). In addition, the CNA did not identify target populations, specific causes of needs based on data analysis, specific school performance targets, or prior year outcomes. Rather, the CNA seemed to repeat many of the same elements that had appeared in the CNAs in the district's ESEA Applications from the last several years, with no direct connection to data analysis. Since the CNA is an ongoing process, not a one-time event, the district must institute processes and/or procedures to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families.

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Citation(s):

ESEA §1112(c)(6) Local Educational Agency Plans: Assurances

Required Action(s):

Since the CNA is an ongoing process, the district must institute processes and/or procedures to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families. As part of the submission of its corrective action plan (CAP), the district must submit evidence of established processes and/or procedures to ensure:

- The CNA includes a thorough analysis of both quantitative and qualitative data to identify specific needs for students, staff, and/or parents and families.
- The CNA process involves all relevant stakeholders, to include administrators, instructional staff, non-instructional staff, support personnel, parents and families, and outside community members.

Recommended Action(s):

It is important to note that the CNA serves as the basis for which all budgeted costs are determined to be necessary, reasonable, and allocable to the Title I, Part A grant program (as well as to all other ESEA titled programs). Consequently, it is recommended the district institute the following steps for the development of a more robust annual CNA that clearly articulates the identified needs not only for the FY 2026 ESEA project period, but also for all subsequent ESEA project periods:

1. Assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA.
2. Include more specific and quantifiable details for each identified need. This may be accomplished by providing more exact and specific information regarding each identified need (e.g., target populations, grade levels, performance targets, academic and non-academic outcomes, root causes of the needs, evaluation of prior year outcomes, etc.).
3. Ensure the active engagement of parents and families, as well as outside community members in the development, implementation, and ongoing monitoring of the CNA.
4. Incorporate a formal evaluation process as part of the CNA to strengthen the required progress monitoring elements (evaluation) as articulated in ESEA.

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Finding 2:

The district did not provide evidence of a school-level parent and family engagement policy for each Title I-funded school. 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, or how each school widely distributed its school-level parent and family engagement policy to parents and families.

Pursuant to ESEA legislation, parents and families must be involved in the development of the written school-level parent and family engagement policy, as well as be informed of the ways in which they can further participate in the academic performance and achievement of their children.

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 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.

Finding 3:

The district did not provide evidence of a school-parent compact for each of its Title I-funded schools. In addition, the district did not provide evidence that parents and families were actively involved in the development of each school-parent compact, or how each school widely distributed its school-parent compact to parents and families.

Pursuant to ESEA legislation, the school-parent compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the challenging State academic standards.

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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 school-parent compact. The development and distribution of a school-parent compact must:

1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the served children to meet the challenging, State academic standards, and the ways in which each parent will be responsible for supporting their children's learning. The school-parent compact also must detail the ways parents can volunteer in their child's classroom; and participate, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
2. Address the importance of ongoing communication between teachers and parents, through at a minimum —
 - a) parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement;
 - b) frequent reports to parents on their children's progress;
 - c) reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities; and
 - d) regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand.

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

Finding 4:

The district did not provide evidence that the Title I, Part A Parents' Right-to-Know letter was prepared and distributed at the beginning of the 2024-2025 school year. In accordance with the ESEA, all districts are required to notify parents at the beginning of each school year of their

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‘Right to Know’ the professional qualifications of their children’s classroom teachers and paraprofessionals.

Pursuant to ESEA legislation, parents may request, and the district will provide information regarding the professional qualifications of the student’s classroom teachers, including at a minimum, the following:

1. Whether the student’s teacher—
 - a. has met State qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
 - b. is teaching under emergency or other provisional status through which State qualification or licensing criteria have been waived; and
 - c. is teaching in the field of discipline of the certification of the teacher.
2. Whether the child is provided services by paraprofessionals and, if so, their qualifications.

Citation(s):

ESEA §1112(e)(1)(A) Local Educational Agency Plans: Parents Right-to-Know

Required Action(s):

The district must create and distribute its Title I, Part A Parents Right-to-Know letter, on school letterhead, that includes a date of issuance and informs parents of their right to request information about the qualifications of their children’s teachers. The Parents’ Right-to-Know letter must meet the following requirements:

1. issued in English and other languages that represent the school community;
2. issued in an understandable format; and
3. issued in a timely manner.

A [sample letter](#) may be found on the Title I, Part A website. The district must submit a copy of the dated Parents’ Right-to-Know letter as part of the submission of its CAP.

Finding 5:

The district did not provide evidence that each school receiving Title I, Part A funds convened an annual, Title I meeting for parents and families of participating children. Pursuant to ESEA legislation, a Title I-funded school must convene an annual meeting at the beginning of the school year, to inform parents and families of the school’s Title I, Part A program(s), the Title I, Part A legislative requirements, and the ways in which parents and families can be engaged actively in helping their children succeed academically.

Citation(s):

ESEA §1116(c) Parent and Family Engagement: Policy Involvement

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Required Action(s):

The district must ensure every Title I-funded school holds annual, Title I, Part A meetings at the beginning of each school year (no later than the first week in October or earlier). To document these annual meetings, the district must maintain the following information on file:

1. invitational letter/flyer;
2. meeting agenda;
3. meeting minutes; and
4. sign-in sheets or a list of the names of staff and parents who attended the meeting.

Each piece of documentation must include the exact date on which the annual, Title I, Part A meeting was held. As part of the submission of its CAP, the district must submit evidence of processes and/or procedures in place to ensure the required annual, Title I, Part A meetings take place at the beginning of the 2025-2026 school year.

Finding 6:

The district did not provide evidence of its outreach to parents of English learners to inform them of the ways they can become involved in their children's education by:

- helping their child attain English proficiency;
- assisting their child to achieve at high levels within a well-rounded educational environment; and
- enabling their child to meet the challenging State academic standards.

Citation(s):

ESEA §1112(e)(3)(C) Local Educational Agency Plans: Parents Right-to-Know

Required Action(s):

For the 2025-2026 school year, the district must develop processes and/or procedures to ensure that the district implements effective means of outreach to parent of English learners. As part of the submission of its CAP, the district must submit evidence of those processes and/or procedures.

Finding 7:

The district did not inform parents/families of English learners that they have been identified as eligible for participation in the district's supplemental English Language services program. Pursuant to ESEA legislation, districts using Title I or Title III funds to provide a language instruction educational program as determined under Title III shall, not later than thirty (30) days after the beginning of the school year, inform parents and families of an English learner identified for participation or participating in such program of specific requirements.

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Citation(s):

ESEA §1112(e)(3)(A)-(B) Local Educational Agency Plans: Parents Right-to-Know

Required Action(s):

For the 2025-2026 school year, the district must develop and distribute a Parents Right-to-Know letter for Language Instruction, provided in the language of the home, as well as English, to all parents and families of English learner students. The notice must be properly dated (DD/MM/YYYY) to ensure compliance with the required timeframe. Notifications may include, but not be limited to mailed letters/notifications, email notifications, notifications sent home with students, etc. The district must keep documentation on file of the date of issuance of this letter/notification, as well as the methods of distribution to parents and families of English learners.

Finding 8:

The district did not provide evidence of the Title I, Part A parent notification letter that informs parents of their children's eligibility for services. Pursuant to ESEA legislation, the parent notification letter regarding their child's eligibility for services should be sent after the student selection process is completed and must include the Title I entrance and exit criteria for the parent's children.

Citation(s):

ESEA §1116(c)(4) Parent and Family Engagement: Policy Involvement

Required Action(s):

The district must, for the 2025-2026 school year, distribute its Title I, Part A parent notification letter for services, on school letterhead, to include a date of issuance and the option for parents to refuse Title I, Part A services for their children. In the letter, the district may provide contact information for the district staff member who parents may contact if they want to discuss their decision to refuse services. If a parent refuses services, the parent's signature must be kept on file by the district. In addition, the letter must be translated into multiple languages that are easily understandable by the parents.

Additional Recommendation(s):

In reviewing the Homeless Students Tab, which appears in the Program Specific tab in the Title I, Part A section of the 2024-2025 ESEA Consolidated Subgrant Application, the following items were noted:

- The district did not provide an explanation describing the types of Title I, Part A services provided to eliminate barriers to enrollment, attendance, and academic success.
- The district did not select the correct Needs Assessment methodology.
- The district did not select the correct Homeless Students Reserve method.

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For the 2025-2026 project period, the district must ensure that the explanation sufficiently describes the exact types of services provided to eliminate barriers to enrollment, attendance, and academic success. Just listing, for example, “funds are set aside for assistance” and “instructional supplies will be purchased” is not specific enough to know what type of ‘assistance’ is provided and what types of ‘supplies’ are purchased.

Without these specific details, it is impossible to determine how the district is removing barriers to enrollment, attendance, and academic success for students experiencing homelessness. This is accomplished by specifically describing the actions or steps the district will take to eliminate such barriers. For example, a more specific explanation would be as follows: *The district utilizes its Homeless Students reservation of funds to assist in removing barriers to enrollment for elementary level homeless students by paying postage to obtain birth certificates and acquiring required immunizations.* The district is encouraged to visit the [Education for Homeless Children and Youth Program](#) website for additional information.

The district should create a dedicated Title I, Part A information page on its website which should include all required parent notifications.

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.

Title III

The review of the district’s 2024-2025 Title III programs yielded the following programmatic findings.

Finding 1:

The district did not have English language proficiency screener scores for students who were identified as MLs.

Citation(s):

ESEA §3115(a)(2)(A) Subgrants To Eligible Entities: Purposes of Subgrants

Required Action(s):

As part of the CAP, the district must administer an [approved English language proficiency screener](#) and submit a list of all students identified as MLs with a corresponding English language proficiency (ELP) screener score..

Finding 2:

The district did not have a written process for monitoring former MLs, including:

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- documentation of correspondences, meetings, or formal documentation demonstrating monitoring of exited MLs (sample [Monitoring Tool](#));
- a data system to track the academic progress of former MLs;
- examples of follow up support for Former MLs that provide additional instructional supports; and
- a written process for re-identification and re-entry of former MLs.

Citation(s):

ESEA §3121(a)(2) Reporting: In General

Required Action(s):

As part of the CAP, the district must submit a written process for monitoring former MLs.

Recommended Action(s):

The district may wish to use the sample monitoring tool as a component of their monitoring of former MLs' process.

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 findings 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 contain incorrect Uniform Grant Guidance (UGG) citations (e.g., the district's policy on suspension and debarment) or lacked mention of pertinent requirements. For example, the district's policy on:

- Conflict of interest does not require the written disclosure of any potential conflict of interest to the Federal awarding agency or to NJDOE.
- Mandatory Disclosures omits the requirement to promptly disclose, in writing to the Federal awarding agency or to NJDOE, all violations of Federal criminal law stemming from conflict of interest violations.

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Moreover, the district did not provide 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. §200.112 Conflict of interest, §200.113 Mandatory disclosures, §200.214 Suspension and debarment, §200.302(b)(6)-(7) Financial management and §§200.400 – 200.476 Subpart E - Cost Principles

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 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.

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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 [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.