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Deerfield Township School District

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New Jersey K to 12 Education

**Collaborative Monitoring Report
June 2025**

District: Deerfield Township School District
County: Cumberland
Dates Monitored: April 14, 15, 16 and 17, 2025
Case Number: CM-11-25

Funding Sources:

Program	Funding Award
Title I, Part A	127,336
Title I SIA	46,521
Title II, Part A	25,553
Title III	0
Title III Immigrant	0
Title IV, Part A	0
IDEA Part B, Basic and Preschool	100,619
Perkins V	0
Total Funds	<hr/> 300,029 <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 Deerfield Township School District (DTSD 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 DTSD 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 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

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III, Title IV-A, IDEA Basic and Preschool from July 1, 2024 through March 14, 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.

DTSD is a PreK–8 school district and operates a schoolwide program in its Title I funded school. In FY 2025, the district is using its Title I funds for instructional materials and supplies, increased learning time, extended day/year programs, and instructional staff.

Title I SIA Projects

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

DTSD does not have any CSI, CII, ATSI, or TSI schools in 2024-2025. Deerfield Township E.S. was a CSI school in 2023-2024 and has SIA carryover funds available for use during 2024-2025. SIA carryover funds are budgeted for resources to implement evidence-based extended learning opportunities, supplemental literacy and math programs, and social-emotional learning strategies.

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;

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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.

DTSD utilizes Title II-A funds to enhance instructional quality by providing high-quality professional development across a range of subjects. This includes job-embedded coaching and teacher mentor training. Additionally, Title II-A funds are used to support programs designed to meet the needs of students with disabilities and multilingual learners.

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, 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, DTSD refused its Title III allocation of \$2,708. An LEA that has a Title III allocation of less than \$10,000 may join a consortium by following the guidelines for developing a Title III consortium. This is strongly encouraged so the LEA can access the funds.

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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.

In FY 2025, DTSD transferred its Title IV-A allocation of \$10,000 to Title I.

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. Additional funds are being used for contractual services, including those provided by a child study team director and a board-certified behavior analyst. IDEA Preschool funds are being used to cover the costs of child study team services 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 fiscal findings which are addressed below and more broadly, in the Administrative Section.

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Finding 1:

In FY 2025, the district issued purchase order (PO) number 250121 to Amazon for the acquisition of Olympic themed tee-shirts and transfer supplies. The associated cost of \$174.37 was charged to Title I. During the monitoring, the expenditure was deemed to be unnecessary for the operation of the district's Title I program and therefore, unallowable.

Pursuant to the Uniform Grant Guidance, the district is required to maintain records which demonstrate the costs charged to the grant are:

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

Citation(s):

Uniform Grant Guidance, Subpart E – Cost Principles 2 C.F.R. §200.403 Factors affecting allowability of costs, §200.404 Reasonable costs and §200.405 Allocable costs

Required Action(s):

After submission of its FY 2025 Title I Final Expenditure Report (FER), the district is required to submit copies of the following documentation via the Collaborative Federal Monitoring Homeroom Application:

1. Title I Account Analysis Detail (AAD) report for the period July 1, 2024 through September 30, 2025 which reflects the reversal of \$174.37 for the Title I expenditure identified;
2. Disbursement Adjustment report for the same period in item 1; and
3. an Excel spreadsheet evidencing exclusion of this expenditure from the corresponding FER.

Finding 2:

The district's AAD report for Title I lacked any indication that an appropriate account description and unique subcode is being used to track the Title I 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):

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 all reserves are identified with proper descriptions and accounted for separately through use of distinct subcodes.

Title I SIA

The review of the district's 2024-2025 Title I SIA programs yielded the following programmatic Recommendation(s) and no fiscal findings.

Recommendation(s):

The district should ensure ASP¹ planning team members, particularly parent(s) and community members(s) participate in at least one ASP planning meeting where attendance is documented and related records are retained.

Title II-A

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

Title III

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

Finding 1:

The district provided evidence of its established identification procedures for identifying students as MLs. However, the district's current procedures do not currently align with New Jersey's standardized statewide entrance procedure as required by ESEA. The district's identification of MLs outlined in its board policy, 2423 Bilingual Education (M), does not satisfy the required process.

Citation(s):

ESEA §3113(b)(2) State and Specially Qualified Agency Plans: Contents and N.J.A.C 6A:15-1 et seq. Bilingual Education

Required Action(s):

As part of the submission of its corrective action plan (CAP), the district must:

1. Update and submit a board approved policy which reflects the required procedures for [identification of a multilingual learner](#) in NJ. Specifically, the

¹ The acronym "ASP" stands for Annual School Plan.

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district must incorporate and implement NJDOE's prescribed multi-step process summarized as follows:

- a) Administer a standardized home language survey (HLS) to students in grades Pre-K to 12.
 - b) Conduct a Records Review for all student in grades Pre-K to 12 for which the HLS indicates "Proceed to Step 2".
 - c) Administer a NJ approved ELP screener for all students in grades K-12 for when the Records Review indicate "Proceed to Step 3".
2. Identify all Pre-K to grade 12 students who are MLs pursuant to N.J.A.C. 6A:15-1.3.
 3. Update the references to N.J.A.C. 6A:15 which align with the appropriate subsections of the administrative code.

The district's CAP must include a plan and timeline for completion of these required actions.

Recommendation(s):

The district should update its board policy 2423 to align with the written manual for identifying students as multilingual learners. The district's policy uses outdated language of N.J.A.C. 6A:15 (e.g., English language learners (ELLs)) instead of the updated, asset-based language used in the July 2023 version (e.g., multilingual learners (MLs)). While this does not impact the identification process, aligning the policy with the most current regulations is essential for consistency and to support this student group from an asset-based lens. The district should update the policy language and implement a regular review process to maintain compliance with future updates.

Additionally, it is recommended that the district update all policies, procedures, forms, and material related to MLs to align with N.J.A.C. 6A:15 and be consistent throughout all references to MLs at the LEA. A footnote regarding the change in language may be found at the bottom of page 3 and on NJDOE's webpage, [Identification of Multilingual Learners \(ML\) and Exiting Students from ML Status](#).

Also, the district included a subset of the allowable NJDOE language instruction educational programs (LIEPs) in its board policy. By explicitly identifying only a subset of the LIEPs, the district may limit the type of LIEP that is most appropriate to implement for MLs. The district should include the range of allowable programs defined at N.J.A.C. 6A:15-1.2 and described at N.J.A.C. 6A:15-1.4.

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Finding 2:

The district is required to identify all students who may be MLs and must maintain a roster indicating all students whose primary language is other than English. These requirements apply to every LEA.

Citation(s):

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 develop a plan and timeline for completion of the required actions outlined in this section. Specifically, the district must conduct a data quality assessment and identify which students require the entry of an ELP Screener Date. The district must contact its student information system vendor to ensure that this data element is added as a data point to be collected consistent with applicable NJSMART handbooks. The ELP Screener Date data element is mandatory for all students who took the ELP screener. This data element captures the date a student took the ELP Screener (e.g., WIDA Screener, MODEL). The data element must be filled in whether the student is eligible for LIEP placement or not (regardless of ELP score). The district must enter the data for students who took the ELP Screener, acceptable values and validation checks. Additional notes can be found in the [NJSMART SID Handbook](#).

Recommendation(s):

The district should review the NJSMART SID Handbook, as well as the [NJSMART State Assessment Registration Student Data Handbook](#), to identify which data elements are required for ML students. The handbooks are updated annually. The district should review the revision history pages in the handbooks to learn which data elements are new or have changed.

In addition, the district should review [NJSMART SID Management FAQ](#); this document is also updated regularly. The district should stay informed about communication sent from the NJDOE regarding changes to New Jersey's statewide data collection system (See [Broadcast](#)). These changes should be shared with all staff who are responsible for data systems which transfer information into the NJDOE's statewide data system.

Finding 3:

All LEAs are required to administer the annual ACCESS assessment to measure a ML's progress in achieving English proficiency. The district did not follow the protocols for students who transferred during the test window from another New Jersey LEA and who have not completed testing of all four domains.

Citation(s):

ESEA §1111(b)(2)(G) State Plan: Challenging Academic Standards and Academic Assessments

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Required Action(s):

By copy of this report of examination (ROE), this matter has been referred to the Office of Assessments for further review and any actions deemed appropriate. The district must contact the Office of Assessments regarding this finding within thirty (30) days from the date of this ROE and comply with any corrective actions required by their office in a timely manner.

As part of the submission of its CAP, the district must develop a plan and timeline for completion of the required actions outlined in this section. Specifically, the LEA must ensure the district test coordinator and any staff who administer the ACCESS screeners and tests complete the [New Jersey ACCESS for ELLs and WIDA Alternate ACCESS District Test Coordinator Training, 2024-2025](#). The district must create and/or revise ACCESS testing protocols to include procedures for students who transfer in the middle of the testing window. Test administrators should follow WIDA's guidance for test scheduling and timing, as outlined in the [WIDA Test Administrator Manual](#).

Recommended Action(s):

The district should review the information on [NJDOE's WIDA](#) webpage, particularly the requirements and resources section, as well as dropdown tabs. Also, the district should contact the NJDOE Office of Assessments at assessment@doe.nj.gov with any questions related to test set-up, administration, and individual student score reports of ACCESS.

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 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 property inventory mentions property records, but does not state such records must include, among other things:

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1. the source of funding for the property (including the FAIN²);
2. the title holder; and
3. the percentage of the Federal agency contribution towards the original purchase.

Moreover, the district's policy on internal controls adopted on October 26, 2023 contains outdated text which requires revision — the policy indicates the district's standard operating procedures will be updated in 2009.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.303 Internal controls, §200.313 Equipment and §200.475 Travel costs

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:

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

² The acronym "FAIN" stands for "Federal Acquisition Identification Number." It is a unique identifier assigned to each Federal award by U.S. Department of Education.

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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.