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Berlin Township School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
February 2026

District: Berlin Township School District
County: Camden
Dates Monitored: November 18, 19, 20 and 21, 2025
Case Number: CM-01-26

Funding Sources:

Program	Funding Award
Title I, Part A	290,458
Title I SIA	0
Title II, Part A	33,838
Title III	0
Title III Immigrant	1,105
Title IV, Part A	19,566
IDEA Part B, Basic and Preschool	173,705
Perkins V	0
Total Funds	<hr/> 518,672 <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 Berlin Township School District (BTSD 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 BTSD 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

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, 2025 through September 30, 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.

BTSD is a PreK–8 school district and operates a targeted assistance program in both of its Title I funded schools. The district utilizes its FY 2026 Title I funds primarily for instructional staff in-class support, 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.

BTSD has outlined plans in the ESEA application to use its Title II-A funds to provide high-quality personalized professional development to their staff. The district's professional learning program includes in-district training sessions, presentations by field experts, consultants, and out-of-district workshops designed to enable participating staff to deliver turnkey training to their colleagues. Additional opportunities include book studies, professional learning communities, and individualized learning aligned to staff interests as well as student and classroom needs.

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District administrators actively encourage professional collaboration and sharing, including coaching, peer observations, mentoring, turnkey training, and informal discussions, all aimed at fostering and strengthening teacher leadership.

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 2026, the LEA is participating in a Title III, Part A consortium because its individual Title III, Part A allocation is less than \$10,000. The LEA is not serving as the lead agency or fiscal agent; therefore, its funding expenditures do not appear in the New Jersey Grants Management System and are instead reflected in the lead agency’s budget. Nevertheless, the LEA is still required to meet all programmatic requirements associated with Title III, Part A.

Title III Immigrant Projects

The purposes of the Title III Immigrant program include:

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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.

BTSD has outlined plans in the ESEA application to use its Title III Immigrant funds to purchase classroom supplies for MLs, support translation and interpretation activities, and provide interpretation services for parents during meetings, conferences, and other school-related events.

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.

BTSD has outlined plans in the ESEA application to use its Title IV-A funds to provide activities to support safe and healthy students. Student assemblies focused on social emotional well-being and trauma-informed programs are planned for the students.

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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 2026 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 instructional supplies for students with disabilities. IDEA Preschool funds are being used to cover the costs for child study team services and instructional supplies 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 2025-2026 Title I programs yielded the programmatic findings below and no fiscal findings.

Finding 1:

The district did not provide evidence of a school-level parent and family engagement policy for each Title I-funded school, or that each policy was widely distributed to parents and families. 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. Rather, the district provided board policy number 6171.3 Title I – Improving Academic Achievement and Parent and Family Engagement.

While all required components were addressed in policy 6171.3, one policy that represents all schools does not meet Title I, Part A legislative requirements. The district must consider that each school has its own unique characteristics and demographics and therefore must develop

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and implement a specific policy for each Title I-funded school that addresses that school's unique needs. In addition, 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 corrective action plan (CAP), the district must submit copies of school-level parent and family engagement policies for each Title I-funded school, as well as evidence of processes and/or procedures established by the district to ensure parents and families are involved in the development of the written school-level parent and family engagement policy.

Finding 2:

The district did provide evidence that it convened an annual, Title I meeting for parents and families of participating children; however, the meeting did not take place until November 12. In addition, the documentation provided was not specific to each served school. 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

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:

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- 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 2026-2027 school year.

Recommended Action(s):

It was noted that very few parents attended the required annual Title I parent meeting. The NJDOE would like to recommend that the district consider changing their method(s) of outreach to receive a better response from parents. If transportation is a barrier, the district should consider meeting in a more centralized location (community center, church, etc.). If childcare is a barrier, the district should consider providing childcare, which would be allowable if there is an educational component. The district should also consider holding the meeting virtually, as well as in person. Additionally, the district should survey parents to see what time of day, or evening would best accommodate most attendees.

Finding 3:

The district did provide evidence of a “Notification of Initial Placement in ESL” letter; however, it did not contain certain required elements. Specifically, it did not:

- 1) Explain the method of instruction that will be used to serve the ML child, describe alternative methods of instruction available and clarify how those methods differ in content, instructional goals, and the use of English and a native language, when applicable to parents.
- 2) Inform parents of participating ML students with disabilities of how the instructional program will meet the objectives of the child’s individualized education program.
- 3) Provide parents with information regarding the child’s academic level.

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

Citation(s):

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

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Required Action(s):

For the 2026-2027 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 ML students. The notice must be properly dated to ensure compliance with the 30-day timeframe and contain all of the required elements. 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 including date of issuance of this letter/notification, as well as the methods of distribution to parents and families of MLs. As part of the submission of its CAP, the district must submit a copy of the notice that will be issued next school year.

Additional Recommendation(s):

The NJDOE recommends that BTSD add a dedicated Title I page to their district website. The information on that page should include, at a minimum, the following documents:

- 1) District level parent and family engagement policy;
- 2) School-level parent and family engagement policy;
- 3) School-parent compact; and
- 4) Parents' Right to Know Letter.

Title II-A

The review of the district's 2025-2026 Title II-A programs yielded no programmatic or fiscal findings.

Title III

The review of the district's 2025-2026 Title III programs yielded no programmatic or fiscal findings.

Title III Immigrant

The review of the district's 2025-2026 Title III Immigrant programs yielded no programmatic or fiscal findings.

Title IV-A

The review of the district's 2025-2026 Title IV-A programs yielded no programmatic or fiscal findings.

IDEA

The review of the district's 2025-2026 IDEA programs yielded no programmatic findings and a fiscal finding which is addressed more broadly, in the Administrative Section.

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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 board policy 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—

- 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, §200.302(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

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district may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.

Finding 2:

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.

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 me via phone at (609) 376-3608 or via email at lisa.mccormick@doe.nj.gov.