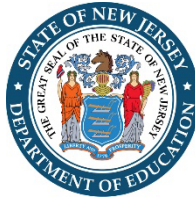


State of New Jersey
Department of Education
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Gloucester Township School District

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New Jersey K to 12 Education

**Collaborative Monitoring Report
September 2026**

District: Gloucester Township School District
County: Gloucester
Dates Monitored: March 31, April 1, 2 and 3, 2026
Case Number: CM-09-26

Funding Sources:

Program	Funding Award
Title I, Part A	1,959,542
Title I SIA	0
Title II, Part A	360,831
Title III	41,724
Title III Immigrant	11,790
Title IV, Part A	201,597
IDEA Part B, Basic and Preschool	2,064,972
Perkins V	0
Total Funds	4,640,456

Gloucester Township School District
Collaborative Monitoring Report
September 2026

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 Gloucester Township School District (GTSD 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 GTSD 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

Gloucester Township School District
Collaborative Monitoring Report
September 2026

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 February 27, 2026. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination. In addition, office furnishings purchased with Federal funds were physically examined without exception.

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.

GTSD is a PreK–8 district that operates a schoolwide programs in its six (6) Title I-funded schools. The district utilizes FY 2026 Title I funds primarily for instructional staff in-class support, instructional staff pull-out program, instructional materials and supplies, equipment, extended day/year programs, professional development activities, and parent and family engagement.

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.

GTSD uses Title II-A funds to build instructional consistency and strengthen educator effectiveness across its schools by aligning professional development with district priorities, state standards, and identified needs. The district coordinates Title II-A activities with other federal, state, and local initiatives through collaboration with supervisors and school leaders, helping to avoid duplication and maximize impact across its diverse student population.

Gloucester Township School District
Collaborative Monitoring Report
September 2026

A key focus of Title II-A funding is increasing principal capacity to conduct consistent observations and walkthroughs across all eleven (11) schools. This work is supported by strategic partnerships with curriculum providers such as Great Minds for programs like Wit & Wisdom. Through on-site coaching and data analysis tools, administrators and teachers examine classroom practices—including student engagement, and instructional delivery—to identify strengths and target areas for improvement.

Professional development is further aligned to the district's priorities in early literacy and Mathematics and is informed by observation and performance data. Additionally, the district uses CSI/TSI¹ identification to prioritize Title II-A funding, ensuring resources are directed to schools and areas with the greatest need.

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.

¹ Comprehensive Support and Improvement/Targeted Support and Improvement

Gloucester Township School District
Collaborative Monitoring Report
September 2026

In FY 2026, GTSD is utilizing Title III, Part A funds for salaries, classroom supplies, professional development, and extended day and summer programs.

Title III Immigrant Projects

The purposes of the Title III Immigrant program include:

1. family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children;
2. recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth;
3. provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth;
4. identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds;
5. basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services;
6. other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and
7. activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.

In FY 2026, GTSD is utilizing Title III, Part A funds for parent, family and community engagement, and the purchase of classroom supplies.

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 to improve the academic achievement and digital literacy of all students.

Gloucester Township School District
Collaborative Monitoring Report
September 2026

GTSD supports a variety of student enrichment activities across eleven (11) schools, including clubs and instructional technology resources designed to increase student engagement and support positive school climate initiatives. Title IV-A funds were used to support these activities and to purchase BrainPOP, an educational software platform that enhances classroom instruction through interactive learning activities and supports student engagement.

The district implemented initiatives under the Safe and Healthy Students content area to promote positive school climate, strengthen relationships among students and staff, prevent bullying, and support student wellness.

Under the Effective Use of Technology content area, the district utilized technology-based instructional resources and tools to enhance teaching and learning and support personalized educational experiences. Program effectiveness was evaluated using multiple data sources, including student participation rates, school climate indicators, discipline data, classroom walkthroughs, observations, and measures of student academic achievement.

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 are being used to offset district tuition costs for students receiving special education and related services in approved private schools for students with disabilities. Additional funds are being used to provide supplies, equipment, and related services for students with disabilities who are parentally placed in nonpublic schools.

FY 2026 IDEA Preschool funds are being used to provide related services to 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 and recommendations below and no fiscal findings.

Finding 1:

The district did not provide documented evidence that it conducted a robust review of the Comprehensive Needs Assessment (CNA). The CNA in the ESEA² Consolidated Subgrant Application repeats many of the same elements that had appeared in the CNAs in the district's ESEA Applications from the last several years. 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.

Citation(s):

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

Required Action(s):

As part of the submission of its corrective action plan (CAP), the district must submit evidence of established processes and/or procedures to ensure:

1. The CNA includes a thorough analysis of both quantitative and qualitative data to identify specific needs for students, staff, and/or parents and families; and
2. The CNA process involves all relevant stakeholders, including 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 Title programs). Consequently, it is recommended that 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 2027 ESEA project period, but also for all subsequent ESEA project periods:

² Elementary and Secondary Education Act

Gloucester Township School District
Collaborative Monitoring Report
September 2026

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).
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.

Finding 2:

In reviewing the Annual School Plans (ASP) for the district, the following items were noted:

1. Overall, there were inconsistencies between the names of the ASP development team members and those recorded on the meeting sign-in sheets. In some cases, individuals identified as team members in the ASP were not reflected on the sign-in sheets, and vice versa.
2. Some of the ASP development team meetings/agendas did not appear to support a robust conversation of the topics listed in the ASP.
3. Two schools (Blackwood E.S. and James W. Lilley E.S.) listed SMART goals that are not measurable. Specifically, the goals did not include a baseline or expected increase.
4. The budget summary pages in the ASPs did not align to the school-level Title I allocations reflected in the Eligibility Step 4 subtab of the ESEA Consolidated Subgrant Application in New Jersey Grants Management System.

Citation(s):

ESEA §1114(b) Schoolwide Programs: Schoolwide Program Plan

Required Action(s):

As part of the submission of its CAP, the district must submit a copy of the processes and/or procedures established by the district to ensure that, for the 2026-2027 school year:

1. ASP Development team members listed in the ASP agree with the meeting participants.
2. Team meetings support a robust conversation of the topic(s) listed on the meeting agenda(s).
3. All smart goals are specific, measurable, attainable, relevant, and time-bound; and

Gloucester Township School District
Collaborative Monitoring Report
September 2026

4. The budget totals align with the school-level allocations as listed on the Eligibility Step 4 subtab in the ESEA Consolidated Subgrant Application.

Recommended Action(s):

To further enhance knowledge regarding the completion of the ASP, it is recommended that the district's administrators and staff review the [ASP Resources page](#) in NJDOE Homeroom.

Additional Recommendation(s):

The following recommendations are presented to assist the district in continuing to strengthen and enhance its Title I, Part A programs and services:

1. The district must ensure that the ESEA Consolidated Subgrant Application is completed properly. The district did not properly budget the Homeless Students Reserve and the optional District-Wide Instructional Program Reserve.
2. The district must ensure that all evidence of consultation with the nonpublic schools is kept on file. The district was unable to locate copies of the nonpublic participation refusal affirmation forms for the 2025-2026 project period.

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 findings, the recommendation below and no fiscal findings.

Programmatic Recommendation(s):

The district has an established policy for identifying students as MLs that aligns with ESEA §3111(b)(2). However, NJDOE recommends strengthening the identification process to ensure that all eligible students are correctly identified as MLs and accurately entered into the [New Jersey Statewide Longitudinal Education Data System](#) (NJSLEDS) including recording a home language other than English as required and described on page 138 of the NJSLEDS Student Management Handbook when a student is identified as an ML.

Title III Immigrant

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

Gloucester Township School District
Collaborative Monitoring Report
September 2026

Finding 1:

In FY 2025-2026, the district received a Title III Immigrant allocation of \$6,683. During the monitoring, it was determined that the immigrant count was not accurately calculated based on the definition provided in NJSLEDS for immigrant status. Specifically, twenty-six (26) students were incorrectly included in the immigrant count and should not have been counted as immigrant students.

As result of the corrected count, the district did not meet the required 2% immigrant student increase threshold and therefore, was not eligible to receive a Title III Immigrant allocation. Accordingly, the district must return the full FY 2026 allocation of \$6,683.

At the time of the monitoring visit, the district had not expended any portion of the allocation and indicated that it would release the funds to NJDOE upon completion and submission of the applicable Final Expenditure Report (FER).

Citation(s):

ESEA §3115(e) Subgrants to Eligible Entities: Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth

Required Action(s):

The disposition of the district's FY 2026 Title III Immigrant allocation of \$6,683 will be addressed through the submission of the district's CAP and subsequent post-monitoring activities. If the district does not complete and submit its Final Expenditure Report (FER) as described above, the CFM Team Lead will provide separate written instructions outlining the procedures for remitting the funds to the NJDOE.

Also, as part of the CAP, the district must:

1. ensure the student information system vendor has a filter to identify students who may leave the district and re-enter the district at a later date and still meet the less than three cumulative years eligibility criteria.
2. provide training to data entry staff to properly report in NJSLEDS which students meet the federal immigrant definition; and
3. ensure immigrant funds are used to support separate and distinct activities for immigrant children and youth and their families only.

Title IV-A

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

IDEA

Gloucester Township School District
Collaborative Monitoring Report
September 2026

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

Administrative Section

Finding 1:

The district submitted board policies for examination which address certain Uniform Grant Guidance (UGG) provisions. Some of the policies examined did not reference applicable UGG citations such as the district's policy on travel or lacked mention pertinent requirements. For example, the district's policy on Mandatory Disclosures omits the requirement to promptly disclose, in writing to the Federal awarding agency or to NJDOE, all credible violations of Federal criminal law stemming from conflict of interest violations.

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

- 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, §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

Gloucester Township School District
Collaborative Monitoring Report
September 2026

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

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.