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Lindenwold Public School District

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New Jersey K to 12 Education

Collaborative Monitoring Report
May 2024

District: Lindenwold Public School District
County: Camden
Dates Monitored: April 9, 10, 11 and 12, 2024
Case Number: CM-09-24

Funding Sources:

Program	Funding Award
Title I, Part A	1,712,048
Title I SIA	456,300
Title II, Part A	175,426
Title III	233,286
Title III Immigrant	21,797
Title IV, Part A	83,398
IDEA Part B, Basic and Preschool	929,381
ARP ESSER (includes all subgrants)	10,718,787
Perkins V	0
Total Funds	14,330,423

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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 Lindenwold Public School District (LPSD 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 LPSD 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 III Immigrant;
- Title IV, Part A (Title IV-A);
- IDEA Part B - Basic and Preschool; and
- American Rescue Plan (ARP) ESSER and applicable subgrants.

The scope of work performed included the review of records and documentation which included:

- accounting records
- annual audits
- board of education (board) meeting minutes
- grant applications program plans and needs assessments
- grant awards

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- payroll records
- purchase orders

The scope of work also included interviews with appropriate district staff regarding the administration of the aforementioned programs/grants.

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic and IDEA Preschool from July 1, 2023 through March 12, 2024. In addition, ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through March 12, 2024. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

General Overview of Uses 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.

LPSD is a Pre-K to 12 school district and operates schoolwide programs in all of its schools. In FY 2024, the district is utilizing its allocation of Title I funds in the following areas:

1. salaries and benefits of basic skills teachers to supplement the instruction of low-performing students;
2. instructional materials and supplies;
3. extended day/year programs; and
4. parent and family engagement.

Title I SIA Projects

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

LPSD receives SIA for two schools, School Four and School Five, that will exit ATSI status at the end of the 2023-2024 school year. The district also received funds in January 2024 for two schools, Lindenwold H.S. and Lindenwold M.S., which were newly identified as CSI.

In FY 2024, the district uses SIA funds for personnel to facilitate instructional supports for English Language Learners and for instructional resources to implement evidence-based practices.

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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.

LPSD uses its Title II-A funds for class size reduction, in-service training for school personnel which includes literacy training. High quality instruction in English Language Arts, Mathematics, Science, Social Studies and Visual and Performing Arts are also implemented with Title II-A funding.

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

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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 2024, LPSD uses its Title III funds for the following:

- salaries;
- benefits;
- instructional supplies;
- supplies and materials;
- professional development; and
- programs for parents.

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 2024, LPSD uses its Title III Immigrant funds for educational technology for newcomers and instructional supplies.

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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.

LPSD uses its Title IV-A funds primarily for college and career guidance and counseling, Science Technology, Engineering and Mathematics, and Visual and Performing Arts programs. Healthy, active lifestyle support activities, such as Lindenwold High School's Teen Pep program which supports sexual health and education, are also implemented utilizing Title IV-A funds.

IDEA

The purpose of the IDEA grant is to provide federal entitlement funds to assist with the excess costs of providing special education and related services to students with disabilities. The FY 2024 IDEA Basic and Preschool funds are being used to reduce district tuition costs for students receiving special educational services in out of district placements. IDEA funds are also being used to support an additional child study team member for the Twilight program, which targets at risk students. Finally, IDEA funds are being used for physical and occupational therapy services at the preschool level.

ARP ESSER

The purpose of ARP ESSER funding is to assist LEAs in preparing for and responding to the impact of COVID-19 on educators, students, and families. Additional uses of funds include, but are not limited to:

1. hiring new staff and avoiding layoffs; and
2. addressing learning loss through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs.

LPSD uses its ARP ESSER funds mainly for:

1. heating, ventilation and air conditioning (HVAC) upgrade projects at Lindenwold M.S. and School 5;
2. salaries of instructional and support staff members;
3. instructional supplies and materials;
4. consultants to provide professional development for teachers and other staff members; and
5. transportation costs for students participating in extended day and school year

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programs during FY 2023 and 2024.

ARP ESSER subgrant funds are being used for teacher stipends for extended day/summer programs, salaries and benefits of English as a Second Language and instructional coaches, and mental health clinician services for students and staff members.

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 2023-2024 Title I programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

Title I SIA

The review of the district's 2023-2024 Title SIA programs yielded no programmatic or fiscal findings.

Title II-A

The review of the district's 2023-2024 Title II-A programs yielded no programmatic or fiscal findings.

Title III

The review of the district's 2023-2024 Title III programs yielded no programmatic or fiscal findings.

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Title III Immigrant

The review of the district's 2023-2024 Title III Immigrant programs yielded no programmatic or fiscal findings.

Title IV-A

The review of the district's 2023-2024 Title IV-A programs yielded no programmatic or fiscal findings.

IDEA

The review of the district's 2023-2024 IDEA programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

ARP ESSER and Related Subgrants

ARP ESSER, ARP Accelerated Learning, ARP Summer Learning and ARP Beyond the School Day

Finding 1:

The district provided board approvals for staff members whose contractual salaries are paid via the ARP ESSER main grant and all applicable subgrants which lacked mention of the employees' salary funding percentages and/or the specific funding sources (e.g., ARP Accelerated Learning Coaching and Educator Support Grant, referred to herein as ARP Accelerated Learning).

LEAs must adopt resolutions evidencing the board's authorization of staff to perform allowable grant-funded activities. With respect to salaried employees, the board minutes must clearly delineate: the account number; funding source; employee name; position title; annual salary; funded salary; and salary funding percentages. Subsequent changes in the employees' funding percentage need to be approved by the board as well.

In regard to staff performing activities outside of normal work duties, the board minutes must include, at a minimum: the account number; funding source; employee name; position title; activity; hourly rate; and a "not-to-exceed" amount.

Pursuant to the Uniform Grant Guidance, the total charge for an employee's compensation must, among other things, follow an appointment made in accordance with LEA's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable. In accordance with State statutes, "no teaching staff member shall be appointed, except by a recorded roll call majority vote of the full membership of the board approving him[/her]."

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Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.430 Compensation - personal services and N.J.S.A. 18A:27-1 Appointment of teaching staff members; vote required

Required Action(s):

The district must obtain approval from the board for all staff members designated to perform grant-funded activities. The corresponding board meeting minutes must include at a minimum the pertinent information summarized in this finding.

ARP Mental Health

Finding 1:

The district appropriated the New Jersey Tiered System of Supports Mental Health Support Staffing subgrant (ARP Mental Health) funds totaling \$1,920.00 and \$146.88 under corresponding line items 200-100 and 200-200. However, the district did not file an amendment application as required because no funds were previously budgeted in these line items.

Citation(s):

EDGAR, 34 C.F.R. §76.700 Compliance with the U.S. Constitution, statutes, regulations, stated institutional policies and regulations and [ESSER I, II, and III Funding – Grant Specific Information](#)

Required Action(s):

The district is required to file an American Rescue Plan Consolidated amendment application to obtain approval for the use of ARP Mental Health funds in previously unopened line items before June 14, 2024. The district must submit evidence that an amendment application was filed to the Office of Fiscal Accountability and Compliance within thirty (30) days from the date of this report of examination.

Administrative Section

Finding 1:

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions. Copies of the requisite written procedures to implement such policies, however, were not provided for review as requested or were inadequate. Examples include, but are not necessarily limited to:

- determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award; and
- the mandatory disclosure of all violations of Federal criminal law involving fraud (pertinent information relating to fraud follows), bribery, or gratuity violations potentially affecting the Federal award.

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Pursuant to ESEA legislation, 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.

Citation(s):

ESEA §9203 Preventing Improper Use of Taxpayer Funds; Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment, 2 C.F.R. §§200.302(b)(6)-(7) Financial management and 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles; and §200.113 Mandatory disclosures

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:

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.

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.