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New Jersey K to 12 Education

Collaborative Federal Desk Monitoring Report 2021

District: Woodbridge Township 23 5850
County: Middlesex
Report date: 6/30/2021

Funding Sources

Program	Funding Award
Title I, Part A	\$2,095,131
Title I- SIA	\$2,081,800
Title I- Reallocated	\$0
Title II, Part A	\$356,815
Title III	\$161,030
Title III Immigrant	\$11,549
Title IV	\$135,038
IDEA Basic	\$3,417,255
IDEA Preschool	\$113,383
ESSER	\$1,470,220
CRF	\$996,377
Total Funds	\$10.838.598

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Background

The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to districts within their local jurisdiction. The provision of these programs and services is based on the requirements as specified in each of the pertinent authorizing statutes (ESSA, IDEA or other federal law(s)).

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 sub recipients. 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 reviewed the LEA's application, documentation and policies and procedures to monitor the LEA's use of federal funds. It also monitors related program plans, as applicable, to determine whether the LEA'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 program's requirements, federal and state law and applicable regulations.

The desk monitoring review included: document and documentation reviews related to the requirements of the following programs: Title I, Part A; Title I, SIA; Title I, Reallocated; Title II, Part A; Title III; Title III Immigrant; Title IV; Elementary & Secondary School Emergency Relief Fund (ESSER); Coronavirus Relief Fund (CRF) and Individuals with Disabilities Education Act (IDEA) Basic and Preschool for the project period beginning July 1, 2020.

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

- accounting records
- annual audits
- board minutes
- current school policies and procedures
- grant applications' program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

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Expenditures Reviewed

The grants reviewed included Title I, Part A; Title I, SIA; Title I, Reallocated; Title II, Part A; Title III; Title III Immigrant; Title IV; ESSER; CRF and IDEA Basic and Preschool beginning July 1, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General Overview of Uses of Federal Funds

Title I-A

Woodbridge Township Public Schools is a PK–12 school district that operates Title I targeted assistance programs in its Title I-funded schools. During the 2020-2021 school year, the district utilized its Title I, Part A allocation for the following areas: 1) Instructional staff for in-class support programs; 2) instructional materials and supplies; 3) increased learning time; 4) parent and family engagement; 5) extended day/year programs; and 6) professional development activities.

Title I-SIA

Funds from this title were used for salaries, instructional materials, professional development and counselor services.

Title I-Reallocated

The LEA was not allocated Title I–Reallocated funds.

Title II-A

The district used Title II-A funds for professional development in the areas of math and English Language Arts.

Title III

During the 2020-2021 school year, the district utilized its Title III allocation for: 1) language instruction programs for newcomer and SLIFE students; 2) teacher salaries; 3) ESL translators; 4) supplemental teacher salaries; 5) WIDA and state guidelines training; 6) professional development for mainstream teachers with ELL students; 7) curriculum development; 8) tutorials for ELLs; 9) programs for parents and community members; 10) instructional; materials.

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Title III Immigrant

Woodbridge Public Schools used their Title III Immigrant Program funds to purchase curricular materials for newcomer immigrant students.

Title IV-A

The district used the Title IV-A funds for a variety of activities including support for a career exploration system, family workshops, and providing counseling services to students over the summer.

IDEA Basic

The FY 2021 IDEA Basic funds are budgeted for tuition costs, salaries for instructional aides, salary for a special education secretary, professional consultation to provide evaluations of disabled students, program review and record keeping, behavioral supports, professional development and instructional and non-instructional supplies. Proportionate Share funds have been budgeted to provide services for disabled students in nonpublic schools in Woodbridge Township.

IDEA Preschool

The LEA did not provide a description of the intended use of IDEA Preschool funds. However, review of the budget details determined that funds were to be used on out-of-district tuition costs, technology and supplies.

ESSER

ESSER projects include tutoring for students falling behind due to remote learning, remote learning software, professional development for staff on remote learning, cleaning supplies and desk shields.

CRF

CRF projects include remote learning software licenses and remote learning books.

Detailed Findings and Recommendations

As appropriate, evidence toward resolution of any “Required Actions” must be submitted within 45 calendar days of receipt of this report.

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Title I-A Programs

Finding 1:

The district-level parent and family engagement policy presented did not contain the date on which it was last reviewed, and Board adopted. In addition, the district-level parent and family engagement policy, as listed on the district's website, contained a reference to the No Child Left Behind Act (NCLB) complaint policy.

Citation: ESEA §1116 (a)(2): *Local Educational Agency Policy – Written Policy*

Required Action(s): Annually, the district must actively engage parents and families, along with district representatives, in the ongoing monitoring, implementation, and revision of its district-level parent and family engagement policy. The district must ensure the district-level parent and family engagement policy contains the date on which the policy was Board approved, as well as maintain records to show the date on which the policy was widely distributed to parents and families. In addition, the district must institute policies and procedures for the method(s) by which the policy will be widely distributed through various venues to parents and families (e.g., posted to district's website, contained in student handbook, etc.). Finally, the district must remove all references to NCLB in its district-level parent and family engagement policy.

Recommended Action(s):

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended the district's administrators and staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Programs at titleone@doe.nj.gov.

Finding 2:

The district did not provide evidence of a Board approved 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. Per 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.

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Citation: ESEA §1116(b)(1): *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 that is Board approved, annually. 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.

Finding 3:

The district did not provide evidence that the Title I, Part A parent notification letter that informs parents of their children's eligibility for services was distributed in English or other languages representative of the school community. Per ESEA legislation, the parent notification letter regarding children's eligibility for services should be sent after the student selection process is completed and must include the Title I entrance and exit criteria for the parent's children. In addition, the parent notification letter must be distributed in multiple languages and in an understandable format.

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

Required Action(s): At the beginning of each school year, the district must distribute its Title I, Part A parent notification letter regarding student eligibility for services, on school letterhead, to include a date of issuance and the option for parents to refuse Title I, Part A services for their children. In the letter, the district may provide contact information for the district staff member who parents may contact if they want to discuss their decision to refuse Title I, Part A services. If a parent refuses services, the parent's signature must be kept on file by the district. This letter must be distributed in multiple languages and in an understandable format for parents.

Finding 4:

The district provided evidence of its outreach to parents of English learners (EL); however, the letter presented was dated September 18, 2015. It is important to document and distribute this letter, not later than thirty (30) days after the beginning of the school year, to inform the parents of EL students of the ways they can become involved in their children's education by:

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

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Per ESSA 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: ESEA §1112(e)(3)(A)&(B) *Parents Right-to-Know: Language Instruction*

Required Action(s): The district must develop and distribute a Parents Right-to-Know letter for Language Instruction, provided in the language of the home, as well as English, to all parents and families of English learner students. Notifications may include, but not be limited to, mailed letters/notifications, email notifications, notifications sent home with students, etc. The district must keep documentation on file of the date of issuance of this letter/notification, as well as the methods of distribution to parents and families of English learners.

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:

- In addition to the district's published Educational Stability for Children in Foster Care policies being posted on the district's website, the district should make available the identity of the Educational Stability for Children in Foster Care liaison on its website and in its staff directory.
- The district provided student rosters that contained specific student identification information (i.e., students' full names, dates of birth, addresses, etc.). When providing such student information, the district should maintain student privacy, per the Family Educational Rights and Privacy Act (FERPA), by identifying students using student numbers or student initials (first name and last initial, first and last initials, assigned student numbers, etc.).
- For Title I, Part A, a district must contact nonpublic schools outside the district based on data (i.e., Aid-in Lieu report, Transportation Summary report) that indicate students in one of the Title I attendance areas attend a nonpublic school beyond the district's boundaries [ESEA section 1117(a)(4)(A) and (c)(1)]. The district must send consultation letters to these nonpublic schools and maintain copies of the letters on file. See sample information at [ESSA Nonpublic Toolkit](#).

Title I-A Fiscal

Review of Title I-A expenditures yielded no findings.

Title I-SIA

The review of Title I-SIA yielded no findings.

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Title I-Reallocated

The LEA was not allocated Title I-Reallocated funds.

Title II-A Program

The review of Title II-A yielded no findings.

Title II-A Fiscal

Finding 1:

The district charged software and professional development to learn how to use the software to the grant. The professional development expenditure is allowable. However, using Title II-A funds to purchase the software is not.

Citations: *ESEA* §2103(b): Allowable Uses

Required Action: The district must back out the charges for Software charged to Title II-A.

Title III Program

Finding 1:

The district did not submit evidence of procedures for supportive services. Students enrolled in Bilingual, ESL, and English language services' programs shall have full access to supportive services such as counseling, tutoring, and career guidance.

Citations: § *ESEA* §3115(d)(1-8): Supportive Services

Required Action: The district shall provide written procedures for ELL students to participate in supportive services.

Recommendations:

The district will share the written procedures for ELL students to participate in supportive services with ELL staff, school administrators, guidance counsellors, parents and all staff that work with ELL students.

Title III Fiscal

The review of Title III expenditures yielded no findings.

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Title III Immigrant Program

The review of Title III Immigrant programs yielded no findings.

Title III Immigrant Fiscal

The review of Title III Immigrant expenditures yielded no findings.

Title IV-A Program

The review of Title IV-A yielded no findings.

Title IV-A Fiscal

The review of Title IV-A expenditures yielded no findings

IDEA Basic

The review of IDEA Basic expenditures yielded no findings.

Note: At the time of this review (5/13/2021), the district has submitted one reimbursement request for Basic and/or Preschool IDEA funds. Additionally, LEA has created an amendment for the carryover; however, it has not been submitted.

Recommended Action:

LEA should submit reimbursement requests on a monthly basis.

IDEA Preschool

The review of IDEA Preschool expenditures yielded no findings.

ESSER

Finding 1:

The district procured goods and did not get multiple quotes for purchases over the Federal Acquisition Regulation.

Citation: 200 CFR 320, Methods of Procurement.

Required Action: The district shall develop procedures for purchasing that adhere to Federal Acquisition Regulation as required under 200 CFR 320.

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CRF

The review of CRF expenditures yielded no findings.

The NJDOE thanks you for your time and cooperation and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Barbara Haake, Office of Fiscal and Data Services via email at barbara.haake@doe.nj.gov.