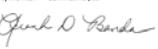**Integrity Monitor Firm Name: CohnReznick LLP**

Engagement: Integrity Monitoring Oversight of Coronavirus Relief Fund Allocations - Digital Divide Grants

Quarter Ending: December 31, 2020

No.	Recipient Data Elements	Integrity Monitor Response	NJDOE Comments
A.	**General Info**		
1.	Recovery Program Participant	New Jersey Department of Education	
2.	Federal Funding Agency (e.g., Section 5001 of CARES Act)	Section 5001 of CARES Act	
3.	State Funding (if applicable)	Not Applicable	
4.	Award Type	COVID-19 Recovery Funds - Digital Divide Grants	
5.	Award Amount	$50 million to support digital divide was allocated as follows: $44 million to close the digital divide in public schools, awarded to 262 LEAs and $6 million to support 719 nonpublic schools to close the digital divide in nonpublic schools.	
6.	Accountability Officer	Amanda Schultz	
7.	Brief Description, Purpose and Rationale of Integrity Monitor Project/Program	On July 17, 2020, Governor Murphy signed Executive Order 166 ("EO 166"), which established the COVID-19 Compliance and Oversight Task Force (the "Taskforce") and the Governor's Disaster Recovery Office (GDRO). Pursuant to EO 166, the Taskforce has issued guidelines ("IOM Guidelines") regarding the appointment and responsibilities of COVID-19 Integrity Oversight Monitors ("Integrity Monitors"). Integrity Monitors are intended to serve as an important part of the State's accountability infrastructure while working with Using Agencies in developing measures to prevent, detect, and remediate inefficiency and malfeasance in the expenditure of COVID-19 Recovery Funds.	
8.	Contract/Program Location (if applicable)	The Program provided assistance to Local Education Agencies (LEAs) in the 3 regions of New Jersey-North, Central and South	
9.	Amount Expended by Recovery Program Participant to Date	$48,967,816.00	
10.	Amount Provided to other State or Local Entities	$48,967,816.00	
11.	Completion Status of Contract or Program	The grant period ended on October 31, 2020, with Final Reporting due on 11/15/20; final reporting is still pending for subset of LEAs	
12.	Expected Contract End Date/Time Period	12/30/2020	
B.	**Monitoring Activities**		
13.	If FEMA funded, brief description of the status of the project worksheet	Not Applicable	

No.	Recipient Data Elements	Response	NJDOE Comments
14.	Quarterly Activities/Project Description (include with specificity activities conducted, such as meetings, document review, staff training, etc.)	The Integrity Monitor conducted a kickoff meeting on 12/2/20 with NJDOE personnel to confirm engagement scope and objectives, the level of coordination expected during the engagement, the Accountability Officer and primary points of contact, protocol for contacting Program staff and LEA personnel, and other project and administrative expectations. The Accountability Officer notified the LEAs of the project and pending contact from the Integrity Monitor. The Integrity Monitor made contact with the LEAs as an initial introduction and to start the risk assessment process and request initial documents. Upon initial kickoff, the following tasks were completed: • Coordinated with NJDOE on follow-up questions and requests essential for initial contact with the LEAs and completion of the risk matrix. • Selected the sample of LEAs for monitoring; coordinated with NJDOE in finalizing the sample. • Updated the risk matrix format to make it more conducive for information and data collection. • Provided copy of the risk matrix to NJDOE for review prior to coordination with the LEAs; • Confirmed and requested access to the system of record for the Digital Divide Program; • Submitted risk matrices to the LEAs for initial completion and document requests; • Reviewed risk matrix responses, performed additional research, and conducted follow-up with LEAs to complete risk matrices; • Assessed the risk of each associated process area and identified potential areas of high risk; • Documented potential process gaps; • Reviewed system data and coordinated with NJDOE and LEAs to gather required information to complete risk matrices; • Remained cognizant of any potential areas of fraud, waste and abuse for communication to NJDOE; • Coordinated with NJDOE to conduct system walkthrough; • Requested, received and reviewed support for NJDOE prior monitoring of LEAs; • Initiated compliance reviews of system data based on Program rules; • Conducted review of LEA purchases based on purchase order/invoice documents available in the grant management system (EWEG); • Requested support from LEAs as necessary; • Discussed initial testing results and observations with NJDOE and clarified our understanding of Digital Divide processes. • Requested, reviewed, and coordinated with NJDOE and LEAs regarding compliance with CARES Act, NJDOE MOU, EO166, Uniform Guidance, Treasury Guidance, NJDOE risk matrix, NJDOE and LEA policies and procedures; • Evaluated NJDOE and LEA internal controls; • Reviewed document retention policies and processes; • Developed testing procedures for purchases and distribution of devices; • Coordinated with LEAs to request support for the tracking and distribution of digital devices and for meeting the needs of their low income, English Learners, and Special Needs students; • Conducted expanded analysis of device purchases and LEA distribution activities; • Verified LEA application data and final report submission in EWEG; • Documented results and noted any process variances, gaps, and/or areas of improvement for follow-up discussion; • Completed LEA risk matrices and drafted quarterly report for submission to NJDOE; • Conducted preliminary walk through of quarterly report with Accountability Officer ; • Submitted risk matrices and draft quarterly report to NJDOE for review and approval; • Reviewed and coordinated with Accountability Officer on NJDOE responses to draft quarterly report; • Finalized quarterly report and submitted to Accountability Officer for final review; • Submitted final report to the State Treasurer.	
15.	Brief description to confirm appropriate data/information has been provided by recipient and what activities have been taken to review in relation to the project/contract/program.	The Integrity Monitor requested policies and procedures; program awards and expenditure data, contracts and memorandum of understanding, LEA contact information, organizational charts, monitoring and oversight plans, internal assessments, CARES Act Plans, audit reports and corrective action plans, monitoring reports, procurement policies and procedures, personnel resumes, Code of Conduct and Conflict of Interest policies and procedures, training policy and support, process workflows, distribution procedures, inventory listing, and LEA support for the receipt, distribution and tracking of purchased devices. Provided documents were reviewed to support risk assessment results, existence of internal controls, and effective implementation of activities to meet the needs of the Program.	
16.	Description of quarterly auditing activities that have been conducted to ensure procurement compliance with terms and conditions of the contracts and agreements.	Not Applicable	
17.	Has payment documentation in connection with the contract/program been reviewed? Please describe	Per Program requirements, grant recipients were required to upload invoices and purchase orders along with their final report. The Integrity Monitors verified existence and reviewed payment documentation for the LEAs included in the sample.	
18.	Description of quarterly activity to prevent and detect waste, fraud and abuse.	The Integrity Monitors discussed and assessed NJDOE processes related to grantee oversight and reimbursement approval and Program requirements as well as evaluated LEA purchasing and distribution processes. IM also tested LEAs distributions to ensure eligible pupils received needed devices purchased with Digital Divide Funds for the districts received the equipment and provided related reports.	
19.	Provide details of any integrity issues/findings	**1.** The Integrity Monitor verified the methods employed by NJDOE to ensure that philanthropic and ESSER funds are exhausted prior to expending Digital Divide funds. It was noted that the Digital Divide award calculation deducts CARES Act funding and Title I funding from the total District identified need to determine the remaining unmet need and the Digital Divide award amount and philanthropic donations are also accounted. Per confirmation with NJDOE, no additional checks are performed to verify the timing of expenditures to ensure philanthropic opportunities, as available, and CARES Act funding is expended prior to Digital Divide funds. **2.** The Integrity Monitor reviewed EWEG to verify the existence of the LEA DUNS number, SAM registration, and Entity Overview. It was noted that 20 of the 26 Districts did not have an uploaded copy of the "Entity Overview" page in EWEG. **3.** The Integrity Monitor reviewed EWEG to confirm that the FFATA certification and applicable disclosure were completed. o The FFATA certification was not completed for **five** of the 26 Districts.	**1.** The program did not require that districts expend any philanthropic support prior to the use of Coronavirus Relief Funds to close the digital divide – it required districts to incorporate information on committed philanthropic contributions identified through the Economic Development Authority's (EDA) Request for Proposal (RFP) into the final grant application. No respondents to EDA's RFP offered philanthropic support to districts to close the digital divide; there was therefore an offset of zero dollars in philanthropic support. Districts were also not required to expend all CARES Act ESSER funds for this program; the Department was required to exhaust the $10 million of its CARES Act ESSER State set-aside as it is calculated the total amount of CRF needed to close the digital divide for all districts. The $44 million in CRF was based on the total amount of need for districts ($54 million), minus the $10 million of ESSER State set-aside allocated to this project. This calculation was entirely at the State level in determining the funding sources for the program, no offset or documentation of such was required at the district level. Finally, grant allocations for Bridging the Digital Divide were determined by calculating districts' need, and reducing that total dollar amount by the other available funds a district had to close the digital divide, including both the availability of a portion of CARES Act Elementary and Secondary School Emergency Relief funds and Title I-A carryover funds (unspent Title I dollars from the prior year) to determine the cost of the district's remaining need. Because district allocations were already limited to the amount by which their need exceeded other available funding, even if it were a requirement that districts expend CARES ESSER Funds prior to utilizing Bridging the Digital Divide Grant, verification was unnecessary due to this already being incorporated into the award calculation. **2.** The DUNS numbers ensure that districts have appropriately registered with the federal government as an eligible grant recipient in order to facilitate accurate federal reporting. All districts must have a current DUNS number, which remains the same from year-to-year with a valid expiration date, in order to receive reimbursement. Typically, districts are required to initially submit their current DUNS expiration date either at the beginning of the project period or upon entry into the Department's reporting systems (for example, a new charter school). If districts do not update the expiration date for their DUNS number on a timely basis, the EWEG system does not allow reimbursement, and forces districts to complete the update in order to continue. No districts, therefore, can receive federal funding without a DUNS number with a valid expiration date, which verifies that they have met the requirements for SAM registration. As this grant window was within existing federal entitlement project periods, which already require a valid DUNS number and expiration date, the upload of the Entity Overview page was not needed for this grant program if the district received entitlement grant funds. All of the districts reviewed by the integrity monitor received entitlement funds and had valid DUNS numbers. In order to prevent confusion over this in the future, the Department is reviewing its process for verifying DUNS registration and developing program guidelines that reflect this verification process. **3.** The Office of Grants Management (OGM) will include the FFATA requirements as part of the new district performance reports, and as part of that process, will be reviewing district submissions in this EWEG tab and reaching out to districts to ensure that the appropriate FFATA information and certification are completed.

No.	Recipient Data Elements	Response	Comments
		4. The Integrity Monitor reviewed LEA costs based on documents uploaded to the Final Expenditure Report and/or provided by the LEA to verify that purchased items were approved for purchase based on the devices defined in the Device Need tab in EWEG. o 23 of 24 Districts tested included costs for items not listed as a Device Need based on the approved application in EWEG. The costs included charge carts, software licenses, device cases, extended warranties, headphones, headsets, white glove service, shipping, and other professional services. Per Digital Divide FAQ, the costs of hot spot services, software licenses, equipment accessories are not allowed, unless the items are sold as part of the device (included as a bundled cost). One District had not submitted a Final Report and could not be tested since documents and reporting could not be accessed in EWEG. Two Districts did not provide purchase order and invoice support, so costs were determined based on available data in EWEG. Per follow up with one district, PO support in the amount of $56,700 was provided for its tablet purchases, but support was not received for its additional Digital Divide purchases. One district was the victim of a cyber attack and was unable to respond to our request for additional support. Based on follow up with NJDOE, bundled costs were defined as costs included on the same purchase order. Using that definition, potentially unallowable costs in the amount of $153,036.53 were still identified across 11 of the 26 districts. In addition to unallowable costs for iPad cases, support was not provided for $6,760.25 in purchases for one district. The inventory listing provided by this district also did not account for any additional purchases. Including the $6,760.25 in unsupported costs increased the potential unallowable cost to $159,796.78. 4a. In all 24 cases where it was possible to review final reporting in EWEG, variance reporting was inconsistent with actual purchases. Current reporting provides a before and after look at the original device need, the items purchased, and the items received by the District, but reporting did not generally account for the purchases made that were not included as a device need in the approved application. Only a few cases were noted where additional devices were accounted for under the Additional Devices tab. 4b. Four Districts uploaded purchase orders to EWEG that are dated prior to the grant period; however, the Digital Divide funds were used to supplement other funding in all four cases, so purchase agreements may have been in place based on additional funding prior to receipt of the Digital Divide award. 4c. It was also noted that LEAs were reimbursed for hotspot service, purchased as a one-time cost for a defined period of months and as a monthly service. Hotspot service is identified as an unallowable cost per program guidance. Per follow up with NJDOE, it was confirmed that purchases of hotspot service was viewed as acceptable due to the difficulty in purchasing stand-alone hotspot devices. This change in Program policy was not reflected in any published guidance. We did not identify these costs as questioned costs in the totals above except in one case where carrier charges appeared to cover services beyond hotspot services. 5. The Integrity Monitor reviewed Device Variance reporting to confirm completion of District goals related to device purchases in addition to confirming purchases based on purchase orders and invoices provided. o Ten of 24 Districts tested appeared to meet or exceeded the Digital Divide approved award need based on variance reporting (i.e., purchased devices up to or in excess of the total approved in the award calculation). 5a. Although 99 to 100% of funds were expended by all 26 LEAs in the monitoring sample, 17 of the 24 Districts that reflected a device variance in EWEG either purchased items that were not originally identified as a device need in the approved application, did not purchase any of the items within a need category, or only purchased a percentage of the devices within a need category. 5b. 14 of 24 Districts did not meet the level of need approved in the calculation nor in the Device Need tab. Two districts reported that no devices had been received due to supply chain issues, and one district reported that only one device had been received. Device Variance reporting was not provided by two districts. Per additional follow up, seven districts confirmed that they either have not received their devices or have only recently received the devices but have not distributed them.	4. The Department will follow up with the 11 districts to determine if the expenditures for which they were reimbursed were truly unallowable under the Bridging the Digital Divide grant. Since devices are commonly bundled with other necessary accessories, more review of this is needed. Additionally, OGM is reviewing the reimbursement process to examine possible improvements to limit the possibility that the Department reimbursing districts for unallowable costs. 4a. The variance reporting system does allow for districts to identify the specific equipment that aligned with their implemented device program to best meet the needs of their students. To verify, we reviewed one of the districts tested for sampling and noted that the district included "hotspots" that were not identified as a need in the original application when submitting a request for payment. A high variance between the original application's device need and the actual received devices is not unexpected due to the supply chain disruptions and the expectation that districts continuously evaluate their actual student needs. The Department has exercised an appropriate level of flexibility in allowing districts to meet the needs of the students in order to prioritize connectivity to remote learning over adherence to the district's plan developed months ago. It is possible that the supply chain disruptions that have delayed district receipt of devices prevented districts from fully completing their device variance reporting; this information will be captured in the Department's performance report that it plans to deploy shortly. 4b. Pursuant to United States Department of Education guidance on CARES ESSER and United States Treasury CRF guidance, the use of these funds outside of the Department's program period would not cause an unallowable cost at the federal level. However, the Department will review these four districts' submissions to determine whether the information submitted by the district showed purchases that fall outside of the federal or state grant period and whether they should be reviewed for further monitoring. 4c. As noted, the program guidance identified that standalone service was not allowable, however, it is the Department's understanding that purchase of a hotspot device is nearly always inclusive of a year of service. This bundling is allowable and expected as this is routine in the purchase of standalone hotspot devices, and the deployment of devices to students is necessary to include the ability to connect to remote learning. Here, the only nonallowable expenditures would have been for re-upping or extending service alone, not when the service was bundled with the original purchase. 5. The awards were based on an estimated calculation; however, awardees were not limited to that number of devices if they negotiated better pricing or more efficient use of the award dollars. The award calculation was based on an estimated average cost, which allowed for flexibility within each district to identify the specific equipment that aligned with their implemented device program to best meet the needs of their students. 5a. Due to supply chain shortages and changing needs, districts were given flexibility procure the necessary devices to fit the needs of their student population. In future grant opportunities, OGM will clearly outline the flexibilities available to districts in situations where needs may rapidly change from the initial application. In this grant, districts were able to make application adjustments to meet the needs of the district, and similarly OGM has a specific amendment process for longer-term grants that provide district's the opportunity to make any necessary revisions to the original application. 5b. Unfortunately, the pandemic slowed manufacturing of technology devices and with need at an all-time high globally for devices. Please reference the Department's October 9th update broadcast stating, in part, "NJDOE recognizes that some school districts have experienced issues with securing digital devices due to issues with the available supply. The U.S. Department of Treasury issued guidance for states and local governments which recognized this difficulty and allowed for payments from the Coronavirus Relief Fund in instances in which there is a delay in delivery beyond the school district's control. Therefore, school districts are not required to wait until digital devices are received in order to submit reimbursements and should not delay in submitting reimbursements. Prompt submissions will ensure that all funds are benefitting New Jersey students." Based on this Treasury guidance, districts were permitted and advised to move forward with submitting reimbursement requests based upon ordered devices that were delayed in delivery.
		6. The Integrity Monitor followed up with NJDOE to verify the status of any training conducted with the Districts. o Per NJDOE, training was not conducted for this grant; however, the Digital Divide Team reached out to each of the Districts and provided instructions. o NJDOE provided copies of the email correspondence submitted to the Districts. o Given the number of potentially unallowable costs noted within the sample, this item is noted as a potential area for improvement going forward. 7. The Integrity Monitor verified the status of report submission by LEA, in EWEG, and the timeliness of report submission. o Final reporting was due on 11/15/20. o 25 of 26 Districts had submitted final reporting as of 12/11/20. One LEA had not submitted a final report. o 17 of 26 Districts did not submit final reporting by the due date. o As of 12/11/20, final reporting was in a disapproved status for two LEAs. 8. The Integrity Monitor verified reimbursement status in EWEG for the LEAs included in the monitoring sample. o All 26 districts have received final reimbursements. o Current processes allow for payment of reimbursement requests without requiring grantees to provide supporting documentation prior to payment, only to maintain documentation for potential future monitoring. o Of the total Digital Divide allocation of $11,131,559 for the districts sampled, total unexpended funds, based on expenditure reporting in EWEG, was $20,936. o 23 of the 24 LEAs tested received reimbursement for costs that may be unallowable. The current process of fully reimbursing grantees without requiring supporting documentation increases the potential for approving unallowable costs and requiring the repayment of grant funds. o It wasn't possible to test one LEA based on documents available in EWEG since the district has not submitted a final report and documents were not available.	6. Typically, Technical Assistance training sessions are provided for all grant programs. This grant, however, was unique in that it had a short turnaround from award to completion (less than 4 months), and the identified need to make funds available as soon as possible to accommodate likely implementation of at least part time virtual instruction. Given the importance of a student access to digital devices for remote learning as we approached a new school year, time was of the essence. Instead, of in-person or virtual Technical Assistance sessions, the Department released multiple guidance documents to districts, provided districts with one-on-one assistance and guidance. Additionally, the Department utilized the 21 county offices to provide outreach and reminders to districts regarding the program. 7. Quarterly reporting was not available due to the abbreviated grant period was from July 16th – October 31st which did not include multiple quarters for reporting. Following the close of the final report deadline on November 15, 2020, a compiled a list of districts who had not completed their final reports was developed and staff engaged in outreach to ensure that districts completed and submitted their final reports. Due to many simultaneous grant programs, some districts required several additional points of contact to remind them of the submission due dates. 8. Local educational agencies (LEAs) are highly regulated entities with a strong structure of financial laws in place, and school districts are prohibited by law from expending funds prior to the delivery of goods. LEAs are subject to annual independent auditing, the results of which place them at risk for the placement of a State monitor, among other actions, to oversee district operations, as well as regular Department-level auditing and monitoring of state and federal programs. The Department's reimbursement process for grants relies on this rigorous financial regulation. Typically, the expenditure reports, monitoring and single audit follow-ups includes request for documentation such as receipts and/or invoices. In this Bridging the Digital Divide Grant, the pandemic slowed manufacturing and delivery of technology devices in conjunction with an all -time high global need for devices. Please reference the Department's October 9th update broadcast stating, in part, "NJDOE recognizes that some school districts have experienced issues with securing digital devices due to issues with the available supply. The U.S. Department of Treasury issued guidance for states and local governments which recognized this difficulty and allowed for payments from the Coronavirus Relief Fund in instances in which there is a delay in delivery beyond the school district's control. Therefore, school districts are not required to wait until digital devices are received in order to submit reimbursements and should not delay in submitting reimbursements. Prompt submissions will ensure that all funds are benefitting New Jersey students." The shortage in the supply chain made it almost impossible to collect receipts as devices were not available. As a note, the United States Department of Education reviewed the Department's reimbursement policy and procedures within the prior year during routine federal monitoring and no deficiencies, findings or issues with the procedures were identified at that time.
		9. The Integrity Monitor reviewed the final report in EWEG to verify existence of invoice and PO details for the LEAs included in the monitoring sample. o Expenditure support was uploaded to EWEG for 24 of 26 LEAs; however, only 22 LEAs uploaded actual copies of purchase orders or invoices. o File errors were received for files uploaded for four districts. 10. The Integrity Monitor reviewed LEA documents uploaded to EWEG to confirm existence of the required closeout documents. 10a. 16 of 25 Districts did not provide Project Activity Plans. o Two Districts provided files that don't show any content. 10b. It wasn't possible to verify documents for one district since a final report has not been submitted. o Expenditure support was provided for 24 of 25. 10c. None of the districts provided equipment inventories. Any documents named "equipment inventory" in EWEG were actually copies of purchase orders. 10d. The Integrity Monitor requested and reviewed NJDOE procedures for conducting expenditure reviews. o The information provided only included a listing of grant applicants and associated data but did not provide details on how expenditure reviews are actually conducted. 10e. The Integrity Monitor coordinated with the LEAs to confirm the following: o Whether devices purchased with Digital Divide funds had been received; o The inventory listing of the devices received; o Existence of procedures for distribution of devices purchased with Digital Divide funds; o Outreach efforts completed and support; o Student tracking for distributed devices; and o Tracking for meeting the needs of low income, English learners, and Special Education populations. o 15 of 26 Districts confirmed receipt of all purchased items. Two districts confirmed partial receipt of purchased items. One district confirmed delivery of equipment on 12/11. o Of the 14 Districts that have received all devices and have distributed the devices, all 14 provided some variation of an inventory listing. o 16 Districts provided support for distribution procedures. o 14 Districts confirmed some level of outreach activities, and 14 districts provided support for those efforts. o 14 Districts provided support for the students and staff who received devices. o Only 8 Districts provided support for tracking the distribution of equipment and need satisfaction of low income, English learners, and Special Education populations.	9. It is possible that, given US Treasury guidance that districts may seek reimbursement prior to receipt of orders due to supply-chain disruptions, that districts do not yet have all applicable documentation. The new performance report will gather additional information to verify districts eligible expenditures. The Department's monitoring of districts to ensure they maintained appropriate documentation related to this grant program is currently underway; this will also be verified by district independent auditors during the annual audit at the conclusion of the 2020-2021 school year. 10. A Project Activity Plan is typically for a discretionary grant program that involves the implementation of a new instructional or student support project, rather than solely the purchase of devices, so it was not required for this program. 10a. Districts' naming convention on files could impact the ability to view the files, and the Department plans to resolve this issue by collecting additional information in the forthcoming performance report. 10b. One district did not yet submit a revised final report – for this and any district that did not do so, the Department is following up with the district to ensure the submission of a final report; however, these reports are solely for data collection and reporting, and no further funding will be provided based on those submissions. 10c. Equipment purchases, that is individual items over $2,001, were not allowable and unable to be budgeted. The "supplies" line item is the only appropriate budget area for this grant program and was the only allowable budget area for this grant program, thus equipment inventory documents were not required, and any documents uploaded as such were in error. 10d. The Department's automated grant application system (EWEG) utilizes system edits to prevent entry that conflicts with the grant program; therefore, very little manual review by a staff member was needed. The Department is in the process of implementing a process to streamline the development of emergency grant applications within EWEG, in concert with the policy reviews for the reimbursement process outlined above and will reallocate and deploy staff as necessary for follow-up. Once the emergency grant process is implemented, written procedures will be developed and documented to clearly outline the process. 10e. The Department is engaged in a multi-pronged approach to ensure districts' adherence to the program, including current monitoring of districts, implementation of a new performance report to gather additional information to verify district compliance, and required independent auditor review of district expenditures as part of the annual district audit for the 2020-2021 school year.
20.	Provide details on any other items of note that have occurred in the past quarter	Not Applicable	
21.	Provide details of any actions taken to remediate waste, fraud and abuse noted in past quarters	Not Applicable	
No.	Recipient Data Elements	Response	Comments
C.	Miscellaneous		
22.	Attach a list of hours (by employee) and expenses incurred to perform your quarterly integrity monitoring review	For the period of December 2, 2020 through December 30, 2020, the following individuals have expended a total of 418.8 hours: Name: Rochell Cottingham Sarah Cowan Anna Fomina Elsie Guevara Emily McCracken Brandi Saunders No billable expenses were incurred.	

23. Add any item, issue or comment not covered in previous sections but deemed pertinent to monitoring program.	Recommendations on potential actions to improve future Program performance include the following:	
	11. • Reimbursement requests should not be paid prior to reviewing supporting documentation. Not requiring that grantees provide support prior to payment increases the risk of payment of unallowable costs. 12. • NJDOE should conduct mandatory orientation and/or training prior to implementing new programs. Although general instructions were communicated to the LEAs via email, conducting a more detailed orientation or training session would have provided the opportunity for LEAs to ask questions in a group setting and may have reduced the potential for LEAs using Digital Divide funds for unallowable purchases. 13. • NJDOE should improve and document procedures for reviewing applications, expenditure requests, and reporting in EWEG, to reduce the potential for incomplete data, un-submitted documents, and corrupt files provided by grantees. Processes should also include timely follow up when exceptions are identified. 14. • NJDOE should implement processes to ensure Program funds meet required timing requirements. Digital Divide funds were designed to fill any remaining gap after philanthropic and ESSER funds were exhausted; however, checks were not in place to ensure that Digital Divide funds were not expended prior to exhausting these other funding sources. 15. • NJDOE should complete follow-up testing of the LEAs that either have not received or have not distributed their purchased devices, to help ensure purchases are completed and devices are received and distributed in accordance with Program guidelines. 16. • NJDOE should consider enhancements to EWEG to better track actual purchased items in system reporting as opposed to simply requiring grantees to confirm the total items purchased within a need category that may be inconsistent with actual purchases or incomplete in terms of the items purchased. If this is a training issue, NJDOE should provide training to the Districts and hold them accountable when reporting is identified as either inaccurate or incomplete. 17. • Although the Digital Divide Program had a limited time and scope, LEAs should consider improving processes related to the tracking of inventory, device distribution, outreach activities, and servicing the needs of the low income, English learners, and Special Education student populations. For inventory, even items below the equipment value that have a useful life of greater than one year, such as technology devices, Districts may want to implement a standard of tracking that includes a description of the item, a serial number or other identification number, the acquisition date, the cost, the location, use and condition of the item, current user assigned, and any ultimate disposition data including the date of disposal and sale price of the item, as applicable. 18. • NJDOE should update published guidance to reflect any changes in Program policy or guidance, to ensure complete and accurate information is provided to grant recipients. 19. • NJDOE should request an opinion and/or waiver, as required, before enacting changes to Program policy.	11. As set forth above, this grant program presented a unique one-time emergency when the regulating entity, United States Department of Treasury, specifically allowed for the payment of Coronavirus Relief Fund reimbursement prior to the delivery of goods when supply chain disruptions occurred due to the public health emergency. The Department's reimbursement process was reviewed by the United States Department of Education in 2019 and determined to be compliant. However, we are reviewing our reimbursement process to examine possible improvements to limit the possibility that the Department will reimburse districts for unallowable costs. 12. As set forth above, the need to quickly get devices to students prior to the start of the school year, and the volume of grant programs necessitated by the public health emergency, technical assistance sessions were not offered to school districts to assist with this grant application. Instead, of in-person or virtual Technical Assistance sessions, the Department released multiple guidance documents to districts, provided districts with one-on-one assistance and guidance. Additionally, the Department utilized the system of county offices to provide outreach and reminders to districts regarding the program. With the Bridging the Digital Divide grant in mind, the Department has since implemented a Technical Assistance session for another grant program with a short turnaround timeframe. The Department is utilizing the lessons learned from both of these grant programs to implement a process to quickly implement technical assistance sessions for emergency grants and other programs with small windows of time from opening to deadline. 13. In most cases, pursuant to OGM policy, grant applications in EWEG are developed over long periods of time with built-in edits that limit the possibility that applicants will submit incomplete data or unreadable files that prevent confirmation of allowable costs. The grants team is working to implement a process to streamline the development of emergency grant applications within EWEG, in concert with the policy reviews for the reimbursement process outlined above and will reallocate and deploy staff as necessary for follow-up. 14. The Department implemented a process throughout this grant program to conduct individual outreach to districts through both OGM and the county offices to encourage districts to meet deadlines whenever possible. However, given the importance of the issues involved, namely, ensuring access to remote instruction for New Jersey students, as well as the burden on districts for reporting within a short time period while grappling with numerous new grant programs and a public health emergency, the Department prioritized district completion of reports rather than denial of funding by granting extensions to districts. The Department will continue to review our process for setting deadlines for program requirements, reimbursement requests, and final reports to set achievable goals for districts and put the Department in the best position to support them. As set forth above, there were not philanthropic sources identified that districts would need to offset the grant funds for the Bridging the Digital Divide program, and the allocations to districts already deducted alternative funding that the district had available to close the digital divide. Therefore, checks were in place before allocating funds to districts, and were not necessary at the district level. The Department will ensure that should there be program requirements that require the exhaustion of other funds before utilizing new program funds be necessary in a future grant, the EWEG system or staff review will take place. 15. The Department has a multi-pronged approach in place to help ensure purchases are completed and devices are received and distributed in accordance with this program. In October, the NJDOE implemented a weekly survey to gather real-time information about district implementation of solutions to resolve the digital divide for students. This data collection informs regular outreach to districts to understand what barriers remain in place for connecting students with remote education. The Department has designed and already begun monitoring of the program. Additionally, the Department will be deploying a performance report within the EWEG system that will allow districts to, once supply chain disruptions are resolved and they receive devices, provide confirmation of receipt of devices. Finally, audit guidelines are being developed for the statutorily required annual independent audit of districts. 16. The Department plans to implement changes to EWEG that will require districts to more clearly specify the costs for which they are seeking reimbursement using grant program funds. The Department will continue to explore options for further implementation as recommended. 17. The Department of Education is working through the education technology office along with national partners on best practices for wide distribution of devices, including one-to-one devices that have become commonplace during the pandemic. In concert with this grant program, the Department developed the Virtual Learning Toolkit: Resources for Families and Teachers to provide information and supports for families and school districts at implementing remote learning. Our education technology professionals at the Department have remained available to provide one-to-one support districts as they implement these new far-reaching programs and we expect to continue updating our guidance to districts based on what we have learned. 18. The Department has a current policy for establishing and approving grant program policy that was revised within the past month including references to experience during the COVID-19 public health emergency. 19. The Bridging the Digital Divide Program is compliant with the United States Treasury's guidance on the CARES Act Coronavirus Relief Fund as well as the Memorandum of Understanding (MOU) with New Jersey Treasury, so an opinion or waiver was not required to implement any of the changes to the program policy. The Department will ensure that OGM's policies provide for a collaborative effort with related program offices and partner agencies to continue to ensure that changes to program policy are consistent with federal and state requirements.

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Date: December 30, 2020		