

State of New Jersey  
Department of Education  
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**Prospect Park Schools**

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New Jersey K to 12 Education

Collaborative Monitoring Report  
February 2025

**District:** Prospect Park Schools  
**County:** Passaic  
**Dates Monitored:** October 29, 30, 31 and November 1, 2024  
**Case Number:** CM-01-25

**Funding Sources:**

Program	Funding Award
Title I, Part A	690,883
Title I SIA	50,000
Title II, Part A	42,821
Title III	0
Title III Immigrant	5,960
Title IV, Part A	48,649
IDEA Part B, Basic and Preschool	279,462
Perkins V	0
<b>Total Funds</b>	<b>1,117,775</b>

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## **Background**

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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**

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The NJDOE visited the Prospect Park Schools (PPS 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 PPS 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); and
- IDEA Part B - Basic and Preschool.

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

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

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The scope of work also included interviews with appropriate district staff regarding the administration of the aforementioned programs/grants. In addition, a sampling of computing devices and equipment purchased with Federal funds was selected and physically examined without exception.

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, 2024 through September 30, 2024. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

## **General Overview of Used of Federal Funds**

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### **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.

PPS is using its FY 2025 Title I funds to implement a targeted support, schoolwide program in its Title I funded school. In particular, Title I funds are being used for the following:

1. salaries and benefits of basic skills teachers to supplement the instruction of low-performing students;
2. instructional materials and supplies;
3. extended learning programs;
4. professional development;
5. parent and family engagement activities; and
6. interventionist services to support the New Jersey Tiered System of Supports.

### **Title I SIA Projects**

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

PPS utilizes its FY 2025 SIA for one school designated as TSI. FY 2025 SIA funds are budgeted for professional development and related resources to implement evidence-based literacy strategies and resources for extended learning time.

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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.

PPS uses its Title II-A funding to provide high-quality, personalized professional development which includes effective instructional leadership for all educators. Programs to teach students with disabilities and multilingual learners 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 than English. The NJDOE will use “Multilingual

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Learner” and “ML,” respectively, to shift to asset-based language and honor a student’s primary language.

In FY 2025, PPS is a Title III consortium member. Title III funds are budgeted for the following and accounted for/expended by the lead agency on behalf of the consortium members:

- enhancing effective language instruction educational programs (LIEPs);
- professional development for English as a second language (ESL)/bilingual staff and mainstream staff who work with MLs;
- parent outreach for English learners to include ML family nights; and
- job embedded coaching support for ML staff.

### **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 2025, Title III Immigrant funds are budgeted for the following:

- training for teachers of immigrant students;
- instructional supplies and support materials for immigrant students; and
- tutoring services for immigrant students.

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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.

PPS uses its Title IV-A funds primarily to provide student services supporting social and emotional needs. The district has a robust Positive Behavior Intervention and Support program that addresses the social and emotional needs of all of its students. The district has planned character development assemblies and use data and feedback from their interventionists and school counselors to identify their focus. In addition, the district uses technology through Renaissance Learning to differentiate instruction and provide personalized learning for students.

## **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. FY 2025 IDEA Basic funds are being used to reduce district tuition costs for students receiving special educational services at approved private schools for students with disabilities. The district expended IDEA Preschool funds to partially pay the salary and benefits of a preschool teacher for instructing students with disabilities.

Nonpublic IDEA Basic funds are being used for the salary of a reading specialist to work with students with disabilities enrolled at a nonpublic school located in the district. The district is approved to utilize nonpublic IDEA Preschool funds for preschool classroom supplies.

## **Detailed Findings and Recommendations**

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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.

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## **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 2024-2025 Title I programs yielded the following programmatic finding and no fiscal findings:

#### **Finding 1:**

The district did not provide documented evidence that it met the Title I, Part A requirements for consultation for equitable services with nonpublic schools. The district did not provide evidence that it consulted with the nonpublic school within the district. There was also no evidence provided that the district sent letters to seek students who may be attending a nonpublic school outside the district's boundaries that enrolled the district's resident students.

#### **Citation(s):**

ESEA §§1117 Participation of Children Enrolled in Private Schools and 8501 Participation by Private School Children and Teachers

#### **Required Action(s):**

For the 2024-2025 school year, the district must develop and implement processes and/or procedures to ensure it meets all ESEA legislative requirements regarding equitable services for nonpublic school students. As part of the submission of its corrective action plan (CAP), the district must submit evidence of these processes and/or procedures.

For the 2024-2025 school year, the district must contact nonpublic schools both inside and outside the district's boundaries to initiate consultation for equitable services that must begin at the start of the FY 2025 ESEA project period. The district can identify nonpublic schools outside its boundaries by reviewing district data (e.g., Aid in Lieu report, transportation summary report) that identify students in the district's Title I attendance area(s) who attend nonpublic schools beyond the district's boundaries [ESEA Section 1117(a)(4)(A) and (c)(1)]. The district must send these nonpublic schools consultation letters to initiate ongoing, timely, and meaningful consultation for equitable, Title I services. The district must maintain copies of these letters on file, as well as the agenda, meeting minutes, and sign-in sheets or lists of attendees to document the initial consultation meeting. For more specific information and access to all nonpublic school forms and templates, the district may view the [ESSA Nonpublic Toolkit](#).

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### **Title I SIA**

The review of the district's 2024-2025 Title I SIA programs yielded no programmatic or fiscal findings.

### **Title II-A**

The review of the district's 2024-2025 Title II-A programs yielded no programmatic or fiscal findings.

### **Title III**

The review of the district's 2024-2025 Title III programs yielded the following programmatic findings and no fiscal findings:

#### **Finding 1:**

The district did not provide evidence of a written process to evaluate their Language Instruction Educational Programs (LIEPs) using district-level data (e.g., testing scores, English language proficiency growth, state assessments, etc.).

#### **Citation(s):**

ESEA §§3115(c) Subgrants to Eligible Entities: Required Subgrantee Activities and 3111(b)(2)(D)(i) Formula Grants to States: Uses of Funds

#### **Required Action(s):**

As part of the submission of its CAP, the district must provide a process that will be used to evaluate their LIEPs. The process must include:

- How LIEPs are designed to enable MLs to attain English, proficiency and parity of participation in the standard instructional program within a reasonable length of time.
- How LEA data supports ML student groups, such as long-term MLs and dually identified MLs and the data analyzed including:
  - the outcome of the most recent program evaluation analyzing data on ML progress and proficiency by grade span;
  - ML achievement in academic content classes;
  - ML attendance data;
  - ML drop out data; and
  - ML graduation rates.
- A written process for modifying or replacing the chosen LIEP model if data shows that MLs are not making progress within a reasonable period. The process should provide for the inclusion of division-level stakeholders and



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school administrators in setting up planning meetings and their participation in such meetings when they occur.

**Recommendation(s):**

The district may wish to use Chapter 9 of the [English Learner Tool Kit for State and Local Education Agencies](#) to develop a process to evaluate their LIEPs.

**Finding 2:**

The district did not have evidence that they trained special education, Bilingual-endorsed, and English as a Second Language (ESL)-endorsed teachers who work with MLs with disabilities including professional development on how disabilities affect language acquisition (e.g., sign-in sheets, agendas, PowerPoints).

**Citation(s):**

ESEA §3115(c)(2) Subgrants To Eligible Entities: Required Subgrantee Activities

**Required Action(s):**

As part of the submission of its CAP, the district must submit evidence that special education, Bilingual-endorsed, and ESL-endorsed teachers who work with MLs with disabilities will receive professional development on how disabilities affect language acquisition. This evidence can include a training/professional development plan, staff member job titles to be trained, proposed agendas, and training materials.

The district does have a consultant who will conduct training on February 18, 2025, with staff related to MLs with disabilities. Once this training occurs, the district must submit evidence of this professional development (e.g., sign-in sheet, agenda, handouts).

**Finding 3:**

The district did not have a written process to identify criteria to qualify its translation personnel.

**Citation(s):**

ESEA §3115(a)(1) Subgrants To Eligible Entities: Purposes of Subgrants

**Required Action(s):**

As part of the submission of its CAP, the district must submit the process used to qualify personnel used for translation purposes.

**Finding 4:**

The district did not have a process for updating their policies and information about their LIEPs.

**Citation(s):**

ESEA §3115(a)(1) Subgrants To Eligible Entities: Purposes of Subgrants

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**Required Action(s):**

As part of the submission of its CAP, the district must develop and submit a process for updating their policies and information about their LIEPs.

**Title III Immigrant**

The review of the district's 2024-2025 Title III Immigrant programs yielded the following programmatic finding and no fiscal findings:

**Finding 1:**

The district did not provide an accurate list of immigrant students. The list included some students who were in a United States school for more than three years and one student who was born in Guam which is part of the United States. The Federal definition of an immigrant student is one who has been born in another country, ages 3-21, and in a United States school for less than three years.

**Citation(s):**

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

**Required Action(s):**

As part of the submission of its CAP, the district must submit an accurate list of immigrant students based on the Federal definition above.

**Recommended Action(s):**

The district's FY 2025 ESEA Consolidated Subgrant Application for Title III Immigrant funds should be reviewed and updated in the Electronic Web-Enabled Grant system to accurately reflect how the district spends Title III Immigrant funds. The LEA should use district and state data (e.g., accountability profiles, performance reports) to identify the needs of immigrant children and youth. The analysis of the data should drive how the funds are used in an asset-based approach, including developing goals and outcomes to support academic achievement for immigrant children and youth. A needs assessment should be completed annually with the required [stakeholder engagement](#) to appropriately choose how to prioritize and spend Title III Immigrant Federal funds in a supplemental way.

**Title IV-A**

The review of the district's 2024-2025 Title IV-A programs yielded no programmatic or fiscal findings.

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## IDEA

The review of the district's 2024-2025 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 provisions. Some of the policies examined lacked mention of Uniform Grant Guidance (UGG) requirements pertinent to Federal awards and/or relevant citations. For example, the district's policy on:

- Mandatory Disclosures requires PPS to promptly disclose, in writing to the Federal awarding agency or to NJDOE, all violations of Federal criminal law except for the requirement to disclose conflict of interest violations.
- Record retention does not include applicable citations to UGG and the General Enforcement Provisions Act.

Moreover, the district did not submit the following written procedures:

- A procedure 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 pass-through entity 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.

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**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.112 Conflict of Interest, 200.113 Mandatory Disclosures, 200.302(b)(6)-(7) Financial management, 200.334 Record retention requirements and 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles

**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:**

After notification of its virtual monitoring visit, the district opted not submit to reimbursement requests for a number of grants or certain expenditures in the event the department required the reversal of unallowable costs. The district is reminded to submit reimbursement requests on a monthly basis.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal Payment; Office of Grants Management, General Federal Entitlement Grant Guidance; and Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures

**Required Action(s):**

The district is required to submit reimbursement requests on a monthly basis. In addition, the district is responsible for maintaining supporting documentation for seven (7) years and for making it available to the NJDOE, the United States Department of Education, and/or their authorized representatives upon request.

**Advisory Notice**

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**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.

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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](mailto:lisa.mccormick@doe.nj.gov).