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Department of Education  
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Ridgefield Park Public School District

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New Jersey K to 12 Education

Collaborative Monitoring Report  
July 2025

**District:** Ridgefield Park Public School District  
**County:** Bergen  
**Dates Monitored:** May 6, 7, 8 and 9, 2025  
**Case Number:** CM-03-25

**Funding Sources:**

Program	Funding Award
Title I, Part A	414,874
Title I SIA	0
Title II, Part A	58,040
Title III	37,601
Title III Immigrant	6,377
Title IV, Part A	47,727
IDEA Part B, Basic and Preschool	709,993
Perkins V	0
<b>Total Funds</b>	<b>1,274,612</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 Ridgefield Park Public School District (RPPSD 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 RPPSD included staff interviews, as well as the review of documents and records related to the requirements of these programs:

- Title I, Part A (Title I);
- Title II, Part A (Title II-A);
- Title III, Part A (Title III);
- Title III Immigrant;
- Title IV, Part A (Title IV-A); and
- IDEA Part B - Basic and Preschool.

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

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

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

### **Expenditures Reviewed**

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The grants and programs reviewed included Title I, Title II-A, Title III, Title III Immigrant, Title IV-A, and IDEA Basic and Preschool from July 1, 2024 through April 30, 2025. 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.

RPPSD is a PreK–8 school district and operates a targeted assistance program in its four Title I funded schools. The district utilizes its FY 2025 Title I funds primarily for instructional staff in its extended day/year programs, as well as instructional materials and supplies.

#### **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.

In FY 2025, RPPSD uses its Title II-A funds to:

1. provide high-quality, personalized professional development in English Language Arts and Mathematics; and
2. support in-service training for school personnel, delivered in collaboration with the Educational Leadership and Learning Center.

#### **Title III Projects**

The purposes of the Title III, Part A and Title III, Immigrant program include the following:

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1. help ensure that multilingual learners (MLs), including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English;
2. assist all English learners, including immigrant children and youth, to achieve high levels in academic subjects so that all MLs can meet the same challenging State academic standards that all children are expected to meet;
3. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching MLs, including immigrant children and youth;
4. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare MLs, including immigrant children and youth, to enter all English instructional settings; and
5. promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of MLs.

**Note:** The term multilingual learner is synonymous with “English learner” or “English language learner.” Sources which are cited from the United States Department of Education may still reference the use of the term English learner or EL. The NJDOE recognizes that multilingual learners may enter New Jersey’s schools with a level of proficiency in a world language other than English. The NJDOE will use “Multilingual Learner” and “ML,” respectively, to shift to asset-based language and honor a student’s primary language.

In FY 2025, RPPSD uses its Title III funds to:

1. provide salaries for staff to implement extended day English as a Second Language support;
2. purchase a software subscription to monitor student progress; and
3. purchase supplies for parent and family engagement activities.

### **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;

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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, RPPSD uses its Title III Immigrant funds to:

1. provide Know Your Rights workshops for families; and
2. purchase supplies for supplemental programs.

#### **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.

In FY 2025, RPPSD uses its Title IV-A funds to:

1. support well-rounded educational opportunities for all students;
2. provide education for students and families about the college application process, including how to complete FAFSA forms;
3. purchase instructional materials for STEM<sup>1</sup> and Physical Education to support the district's academic programs; and
4. support professional development on using digital tools like i-Ready and Newsela.

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<sup>1</sup> The acronym "STEM" stands for Science, Technology, Engineering and Mathematics.

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## IDEA

The purpose of the IDEA Grant is to provide federal entitlement funds to assist with the excess cost of providing special education and related services to students with disabilities. FY 2025 IDEA Basic and Preschool funds are being utilized to offset district tuition costs for students receiving special education and related services in out-of-district placements. Additional funds are directed towards the salary of a behaviorist, who is responsible for assessing and supporting students with disabilities. Nonpublic IDEA funds are being used to hire consultants, such as board certified behavior analysts, who work directly with students.

### 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.

### Multiple Grants Section

#### Title II-A, Title IV-A, IDEA Basic and IDEA Preschool

##### Finding 1:

The district improperly received early reimbursements of Federal funds when compared to actual expenditures paid based on its accounting records; refer to the following summary below:

Grant	Reimbursement Number	Line Number	Total Amount Reimbursed	Actual Expenditures	Amount Drawn Down Early
Title II-A	Two	200-300	49,324	43,245	6,079
Title IV-A	Two	100-600	15,733	10,160	5,573
IDEA Basic	Two	200-300	51,708	0	51,708
IDEA Basic	Three	100-300	98,270	61,345	36,925
IDEA Preschool	One	100-500	13,601	0	13,601
Total			228,636	114,750	113,886

Pursuant to the Uniform Grant Guidance, LEAs must minimize the time elapsing between the receipt of funds from NJDOE for reimbursement purposes and the payment of grant

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expenditures. To this end, the department's guidance on reimbursement requests authorizes LEAs to claim expenditures that:

1. *have already been paid*; or
2. will be paid within three (3) days of receipt of its reimbursement check.

In regard to number 2 above, the district should only request the reimbursement of expenditures for invoices in hand and determined to be accurate.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal payment and [NJDOE Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

**Required Action(s):**

After submission of its FY 2025 Final Expenditure Report (FER) for Title II-A, Title IV-A, IDEA Basic, and IDEA Preschool, the district is required to submit copies of the following documentation via the Collaborative Federal Monitoring (CFM) Homeroom Application:

1. Title II-A, Title IV-A, IDEA Basic and IDEA Preschool Account Analysis (AA) reports for the period July 1, 2024 through September 30, 2025 which:
  - a) support the expenditure and payment of funds drawn down early; and
  - b) substantiate the sum of expenditures reported by the district on its FERs.
2. Excel spreadsheets that reconcile the accounting reports from item 1b) to the amounts reported on the corresponding FER.

If the district is unable to submit this documentation, the CFM Team Lead will provide the district with specific instructions for the remittance of \$113,886 or any unsubstantiated amount via separate correspondence.

Finally, 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.

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## **Grant Specific Programmatic and Fiscal Section**

### **Title I**

The review of the district's 2024-2025 Title I programs yielded the following programmatic finding. The fiscal findings are addressed below and more broadly, in the Administrative Section.

#### **Finding 1:**

The district provided a copy of a Parents Right-to-Know for Language Instruction letter; however, the letter is missing many of the required components, including that the student was identified as eligible for participation in a Bilingual/English as a Second Language, English language services program.

Pursuant to ESEA legislation, LEAs using Title I or Title III Part A 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 in such a program.

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

ESEA §1112(e)(3)(A)-(B) Local Educational Agency Plans: Parents Right-to-Know

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

For FY 2026, the district must revise the notification to ensure that it includes all the required components listed below:

1. the reasons for the identification of their child as an English learner and in need of placement in a language instruction educational program;
2. the child's level of English proficiency, how such level was assessed, and the status of the child's academic achievement;
3. the methods of instruction used in the program in which their child is, or will be, participating and the methods of instruction used in other available programs, including how such programs differ in content, instructional goals, and the use of English and a native language in instruction;
4. how the program in which their child is, or will be, participating will meet the educational strengths and needs of their child;
5. how such program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation;



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6. the specific exit requirements for the program, including the expected rate of transition from such program into classrooms that are not tailored for English learners, and the expected rate of graduation from high school (including four-year adjusted cohort graduation rates and extended-year adjusted cohort graduation rates for such program) if funds under this part are used for children in high schools;
7. in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and
8. information pertaining to parental rights that includes written guidance —
  - a) detailing the right that parents have to have their child immediately removed from such program upon their request;
  - b) detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction, if available; and
  - c) assisting parents in selecting among various programs and methods of instruction, if more than one program or method is offered by the eligible entity.

As part of the submission of its corrective action plan (CAP), the district must submit a copy of its revised letter, including the required components.

**Finding 2:**

The district's AA report for Title I lacked any indication that an appropriate account description and unique subcode is being used to track the Title I reserves for parent and family engagement, and students experiencing homelessness. Amounts expended for these set-asides must be used for allowable program activities and accounted for separately to enhance the district's ability to monitor unexpended balances, which may be carried forward, provided the funds are spent for their intended purpose or returned to the state.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(3) Financial management and The Uniform Minimum Chart of Accounts for New Jersey Public Schools and Approved Private Schools for Students with Disabilities (UMCOA)

**Required Action(s):**

The district is required to implement procedures to ensure all reserves are identified with proper descriptions and accounted for separately through use of distinct subcodes.

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## **Title II-A**

The review of the district's 2024-2025 Title II-A programs yielded no programmatic findings, and fiscal findings which are addressed in the Multiple Grants Section, as well as the Administrative Section.

## **Title III**

The review of the district's 2024-2025 Title III programs yielded the following Recommended Action(s), and no programmatic or fiscal findings.

### **Recommended Action(s):**

The district will evaluate and implement [continuous improvement](#) strategies to increase effective outreach to parents of multilingual learners, including but not limited to those ensuring:

1. materials and communication are in a language comprehensible to the parent and families;
2. two-way communication which encourages parents' expertise and input; and
3. culturally responsive strategies which highlight families' linguistic and cultural strengths.

## **Title III Immigrant**

The review of the district's 2024-2025 Title III Immigrant programs yielded no programmatic findings, and fiscal findings which are addressed more broadly, in the Administrative Section.

## **Title IV-A**

The review of the district's 2024-2025 Title IV-A programs yielded no programmatic findings, and fiscal findings which are addressed in the Multiple Grants Section, as well as the Administrative Section.

## **IDEA**

The review of the district's 2024-2025 IDEA programs yielded no programmatic findings, and fiscal findings which are addressed in the Multiple Grants Section, as well as the Administrative Section.

## **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

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(UGG) requirements pertinent to Federal awards and/or relevant citations. For example, the district's policy on:

- Mandatory Disclosures omits the requirement to promptly disclose, in writing to the Federal awarding agency or to NJDOE, all violations of Federal criminal law except for the requirement to disclose conflict of interest violations.
- Travel, and suspension and debarment does not include applicable citations to UGG.

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

- A board policy requiring the district to disclose in writing any potential conflict of interest the district, as a non-Federal entity, has to the Federal awarding agency or NJDOE in accordance with the applicable Federal awarding agency policy.
- Written cost allowability procedures necessary to implement the district's cost allowability policy. To be compliant, such procedures cannot simply reiterate the Federal requirements or policies or goals.

Rather, the procedures should be robust and clearly identify roles and responsibilities. They should also provide a series of steps to be followed for determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award. Steps that—

1. offer a detailed description of activities;
2. describe the process used throughout the entire grant life cycle, including the proper submission of applications and amendments in accordance with department instructions; and
3. serve as guide and training tool for employees.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.112 Conflict of interest, 2 C.F.R. §200.113 Mandatory disclosures, §200.214 Suspension and debarment, §200.302(b)(6)-(7) Financial management and §200.475 Travel costs

**Required Action(s):**

The district must develop, revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations and references to current legislation, where appropriate. The district may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.

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**Finding 2:**

The district provided a Title I Revenue Account Analysis (RAA) report for examination which incorrectly includes revenue receipts of \$228,833 from the previous fiscal year. In addition, the IDEA Revenue Report (RR) did not show the correct Current Estimated Revenue amount of \$691,649 and Month to Date Receipts figure of \$675,707 as May 15, 2025. Nor did the district furnish the corresponding IDEA RAA as requested.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302 Financial management

**Required Action(s):**

The district must implement a process to ensure the dollar amount of all Federal grants are recorded appropriately in its financial records, including RAAs and RRs. As part of the submission of its CAP, the district is required to upload revised RAAs and RRs which demonstrates the district has made the necessary adjustments to exclude the prior fiscal year Title I receipts and include the IDEA Basic revenue figures identified in this finding.

**Finding 3:**

The district appropriated Title III Immigrant funds of \$3,375 under line item 100-100 although its budget approved in the NJ Grants Management System does not reflect any funds for this expenditure category. Similarly, the district transferred Title IV-A funds totaling \$334 from line item 200-300 to 200-600. The district did not file an amendment application as required for Title III Immigrant and Title IV-A because no funds were previously budgeted in line items 100-100 and 200-600, respectively.

**Citation(s):**

[ESEA Amendment Instructions](#) and UMCOA

**Required Action(s):**

Going forward, the district must file an amendment application in accordance with departmental guidelines and established deadlines.

**Finding 4:**

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

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**Required Action(s):**

Purchase orders should be issued to all vendors prior to goods or services being provided.

**Finding 5:**

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000. Such purchase orders meet one of a number of definitions of a covered transaction in 2 C.F.R. §180.220. Before entering into covered transactions, these regulations require the district to determine whether the vendor is not debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The covered transactions tested lacked any indication that verifications of this nature are being performed. Verifications may be accomplished by:

1. checking the System Award Management (SAM) Exclusions maintained by the General Services Administration and available at [SAM.gov | Home](https://sam.gov);
2. collecting a certification from the entity; or
3. adding a clause or condition to the covered transaction with that entity (2 C.F.R. section 180.300).

Copies of written evidence demonstrating performance of the requisite verifications must be maintained. In addition to items 1 and 2 above, other examples of evidence include printouts of search results from SAM, imprints from an ink stamp, or Avery labels affixed to purchase orders memorializing performance of this verification.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment

**Required Action(s):**

The district is required to implement procedures to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000. In addition, the district must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

**Finding 6:**

A number of purchase order voucher packets were selected and examined during monitoring. The district was unable to provide evidence that bids or quotes were obtained for various purchase orders (POs). Examples include, but are not limited to PO numbers 25-00735 and 25-00797. These POs exceeded the threshold necessitating bids and quotes in accordance with:

1. the New Jersey Public School Contracts Law (PSCL) and district policy; or
2. procurement standards under Uniform Grant Guidance.

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When the Federal and state legislation and regulations governing procurement are in conflict, the most restrictive prevails. Federal procurement standards do not include all exemptions allowed under the PSCL, specifically, professional services.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.317 - 327 Procurement Standards and N.J.S.A. 18A:18A-37(a) Award of purchases, contracts or agreement

**Required Action(s):**

The district must adhere to the PSCL or applicable provisions of the Uniform Grant Guidance, whichever is most restrictive, when obtaining goods and services.

**Finding 7:**

The district is reminded to submit reimbursement requests for its Federal awards on a monthly basis, unless otherwise precluded from doing so pending the review and approval of a related amendment application by NJDOE.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal payment and [NJDOE 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.

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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).