

State of New Jersey  
Department of Education  
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**Delsea Regional School District**

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New Jersey K to 12 Education

**Collaborative Monitoring Report**  
**April 2025**

**District:** Delsea Regional School District  
**County:** Gloucester  
**Dates Monitored:** February 25, 26, 27 and 28, 2025  
**Case Number:** CM-05-25

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	211,137
Title I SIA	0
Title II, Part A	33,138
Title III	0
Title III Immigrant	0
Title IV, Part A	14,949
IDEA Part B, Basic	560,343
Perkins V	89,248
<b>Total Funds</b>	<hr/> 908,815 <hr/>

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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 Delsea Regional School District (DRSD 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 DRSD 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 IV, Part A (Title IV-A);
- IDEA Part B - Basic; and
- Perkins V.

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.

### **Expenditures Reviewed**

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The grants and programs reviewed included Title I, Title II-A, Title III, Title IV-A, IDEA Basic, and Perkins V from July 1, 2024 through December 4, 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.

DRSD is a grade 7–12 school district and operates targeted assistance programs in both of its Title I funded schools. In FY 2025, the district is using its Title I funds for instructional materials.

#### **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.

DRSD uses its Title II-A funds to recruit, hire and retain effective teachers in English Language Arts and Mathematics. High-quality, personalized professional development, including in-service training sessions, are implemented with Title II-A funds as well.

#### **Title III Projects**

The purposes of the Title III, Part A and Title III, Immigrant programs 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, DRSD is part of a Title III consortium since their Title III allocation is less than \$10,000. The district is not the lead agency, nor the fiscal agent. Therefore, the consortium’s Title III funding is included in the lead agency’s FY 2025 ESEA Consolidated Subgrant Application. Even so, the district is still required to comply with the programmatic requirements of Title III, Part A.

#### **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.

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DRSD uses its Title IV-A funds for summer projects, including an irrigation system for a greenhouse. The summer projects focus on horticulture, STEM<sup>1</sup>, and marketing. Title IV-A funding also supports professional development for relationship-building skills, trauma-informed class management, health and safety practices, and drug and violence prevention programs and activities.

## 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 funds are being used to reduce district tuition costs for students receiving special education services in approved private schools for students with disabilities. Nonpublic funds are being used to provide educational support for students with disabilities who attend nonpublic schools located within the district.

## Perkins V

Perkins V is a Federal education program that invests in secondary and postsecondary career and technical education (CTE) programs. It is dedicated to increasing learner access to high-quality CTE programs of study with a focus on program improvement; alignment across grades 5–12, postsecondary and workforce; and economic development.

FY 2025 Perkins V funds are being used by DRSD to operate Perkins V federally funded programs of study (POS) offered to students participating in CTE. In particular, the NJDOE Office of Career Readiness (OCR) approved the district to operate POS under the following Classification of Instructional Program (CIP) Codes:

CTE Program Name	CIP Code	OCR Effective Dates as POS
Building Construction Technology	460415	December 20, 2017
Sales, Distribution, & Marketing Operations, General	521801	June 14, 2018
Marketing/Marketing Management, General	521401	June 14, 2018
Digital Arts	500102	July 7, 2019
Applied Horticulture/Horticulture Operations	010601	November 26, 2019
CAD/CADD Drafting and/or Design Technology/Technician	151302	February 8, 2021
Accounting	520301	December 26, 2021
Computer Programmer, General	110201	June 12, 2023
Web Page, Digital/Multimedia & Information Resources Design	110801	June 12, 2023

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

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CTE Program Name	CIP Code	OCR Effective Dates as POS
Computer Systems Networking and Telecommunications	110103	June 14, 2023
Engineering, General	140101	July 10, 2023
Radio & Television	090701	December 29, 2023
Music Technology	500913	January 2, 2024

The department approved the district to expend the award primarily for:

1. teacher professional development including stipends and registration fees;
2. various instructional supplies such as textbooks, subscriptions and program consumables;
3. educational technology equipment and devices, including a camera with accessories and a computer monitor;
4. district affiliations;
5. student technical skills assessments; and
6. site licenses.

The district is expending its FY 2025 Perkins V award in a manner consistent with these approved uses.

### **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**

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 a programmatic finding, and a fiscal finding which are addressed below.

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**Finding 1:**

The district provided evidence of its notification to parents and adult students (18 years of age or older) concerning information disclosed to military recruiters, postsecondary institutions, or prospective employers, when requested; however, the notification included outdated references to the No Child Left Behind Act of 2001 (NCLB) and incorrect ESEA section citations.

**Citation(s):**

ESEA §8528(a)(2) Armed Forces Recruiter Access to Students and Student Recruiting Information: Policy

**Required Action(s):**

For the 2025-2026 school year, the district must distribute the required updated notification, regarding the disclosure of students' names, addresses, email addresses, and telephone numbers, upon request, to military recruiters, postsecondary institutions, or prospective employers. The dated notification must include details on how parents may opt-out of this public, nonconsensual disclosure of information, as well as the method and timeline within which to do so.

As part of the submission of its corrective action plan (CAP), the district must submit a revised version of the notification that will be distributed next year. In addition, the district must post this notification on its website in an easily accessible location, in an understandable format, and in languages parents and families can understand.

**Additional Required Action and Recommendation:**

The following required action (item #1) and recommendation (item #2) are presented to assist the district in continuing to strengthen and enhance its Title I, Part A programs and services:

1. The district must revise its ESEA Consolidated Subgrant Application for the current project period to reflect the correct methodology used to calculate the homeless reserve. Currently, the application indicates method #2, but it should indicate method #5 (\$100 per student).
2. The NJDOE recommends that the district consider changing its method(s) of outreach in order to receive a better response from parents. It was noted during the virtual monitoring visit that no parents attended the annual Title I meeting or participated in the creation and/or modification of the district and school-level parent and family engagement policies and the school-parent compacts. If transportation is a barrier, the district should consider meeting in a more centralized location (community center, church, etc.). If childcare is a barrier, the district should consider providing childcare, which would be allowable if there is an educational component.

Additionally, the district should survey parents to see what time of day or evening would best accommodate the majority of attendees. Additional information,

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including a sample invitation and agenda for the Title I annual meeting may be found on the NJDOE Title I website at: [Parent and Family Engagement](#).

**Finding 2:**

During the monitoring, copies of board minutes evidencing the board's authorization of staff to perform allowable grant-funded activities were furnished as requested. The minutes, however, lacked pertinent information to facilitate an examination of underlying payroll records, such as the approved hourly rates and school name for each staff member, as well as the funding source.

With respect to salaried employees, the board minutes must clearly delineate: the account number; funding source; employee name; position title; annual salary; funded salary; and salary funding percentages. Subsequent changes in the employees' funding percentage need to be approved by the board as well.

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

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

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.430 Compensation - personal services, Education Department General Administrative Regulations (EDGAR), 34 C.F.R. §76.730(e) Records related to grant funds and N.J.S.A. 18A:27-1 Appointment of teaching staff members; vote required

**Required Action(s):**

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

**Title II-A**

The review of the district's 2024-2025 Title II-A programs yielded no programmatic findings, and a fiscal finding which is addressed more broadly, in the Administrative Section.



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### **Title III**

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

### **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 more broadly, in the Administrative Section.

### **IDEA**

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

### **Perkins V**

The review of the district's 2024-2025 Perkins V programs yielded programmatic findings, and fiscal findings which are addressed below and more broadly, in the Administrative Section.

#### **Finding 1:**

The district did not provide evidence of opportunities for student membership and participation in the CTSO,<sup>2</sup> SkillsUSA in the following approved POS:

- Music Technology (500913);
- Radio & Television (090701); and
- Web Page, Digital/Multimedia & Information Resources Design (110801).

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

Perkins V Act §135(b)(5)(O) Local Uses of Funds: Requirements for Uses of Funds and N.J.A.C. 6A:19-3.1(a)(6) Program requirements

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

As part of the submission of its CAP, the district must submit evidence of CTSO membership agreement in a SkillsUSA chapter appropriate for the POS identified above.

#### **Finding 2:**

The district did not provide for examination records evidencing professional development activities aligned with all of its approved CTE POS. Instead, DRSD provided limited records (e.g., agenda, MEA certificate) for one of its POS.

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<sup>2</sup> The acronym "CTSO" stands for "career and technical student organization."

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**Citation(s):**

Perkins V Act §135(b)(2) Local Uses of Funds: Requirements For Uses of Funds and New Jersey Department of Education Comprehensive Local Needs Assessment Guide

**Required Action(s):**

The district must demonstrate CTE professional development is provided for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and academic counselors, or paraprofessionals involved with its approved CTE POS. Such evidence consisting of and/or demonstrating the following, must be submitted with the district's CAP:

- the district's implementation of an on-going process to incorporate high quality professional development for administrators, teachers and counselors, paraprofessionals to addressing gaps and disparities specific to approved CTE POS;
- a Professional Development (PD) plan for district staff involved in approved CTE POS; and
- conference or workshop materials for PD offered by LEA (e.g., sign-in sheet(s), agendas, and related conference/workshop materials).

**Finding 3:**

The district was unable to provide documentation evidencing that CTE Advisory Committee meetings were held for any of its department approved CTE POS. LEAs are required to establish an advisory committee for each approved CTE POS, which must meet a minimum of two (2) times per school year. The purpose of the advisory committee is to provide assistance and recommendations for the continuous improvement of CTE programs. Each advisory committee shall include parents, students, CTE teachers licensed in the program area, school counseling staff, representatives of business and industry with content expertise in the program area, labor organizations, school district representatives of special populations, postsecondary institutions, and other interested individuals representing the appropriate programs.

**Citation(s):**

EDGAR, 34 C.F.R. §76.700 Compliance with the U.S. Constitution, statutes, regulations, stated institutional policies, and applications and N.J.A.C. 6A:19-3.1(a)(2) Program requirements

**Recommendation(s):**

The district should refer to the [NJDOE CTE Program Advisory Committee Handbook](#) for guidance and consider contacting its assigned program officer within the NJDOE OCR for further assistance.

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**Finding 4:**

DRSD did not adhere to certain implementing regulations and program specific requirements for the Perkins V grant. For example, the purchase orders (POs) examined did not include CIP codes or the intended location of equipment and computing devices. It warrants mentioning that a similar finding was previously cited in an audit report issued by OFAC on the district's FY 2020 Perkins grant.

**Citation(s):**

EDGAR, 34 C.F.R. §76.700 Compliance with the U.S. Constitution, statutes, regulations, stated institutional policies, and applications and Perkins Grant Application Guidelines, Section 6.6 Monitoring

**Required Action(s):**

The district must implement procedures to ensure personnel assigned to administer the Perkins V grant comply with the program specific requirements applicable to each project period.

**Administrative Section**

**Finding 1:**

The district submitted board policies for examination which address certain Uniform Grant Guidance provisions. Some of the policies omitted relevant Uniform Grant Guidance (UGG) citations (e.g., district's policy on travel) or lacked mention of pertinent requirements. For example, the district's policy on Mandatory Disclosure does not cite violations involving a conflict of interest as a mandatory disclosure.

Moreover, the district did not submit 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 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:**

On a few occasions, the district failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). State regulations require that a *properly executed* purchase order be issued *prior* to the purchase of goods or the rendering of services.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(4) Financial management and N.J.S.A. 18A:18A(2)(v) Definitions: Purchase Order

**Required Action(s):**

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

**Finding 3:**

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000.00. 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

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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 \$25,000.00. In addition, the district must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

**Finding 4:**

A number of PO voucher packets were selected and examined during monitoring. The district was unable to provide evidence that quotes were obtained for PO number 500319 The PO amount exceeded the threshold necessitating quotes in accordance with:

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

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 5:**

After notification of its virtual monitoring visit, the district opted not to submit reimbursement requests for a number of grants 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 and [NJDOE Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

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**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).