

State of New Jersey
Department of Education
PO Box 500
Trenton, New Jersey 08625-0500

Cape May City Elementary School

921 Lafayette Street
Cape May, New Jersey 08204
Phone: (609) 884-8485



New Jersey K to 12 Education

Collaborative Monitoring Report
June 2025

District: Cape May City Elementary School
County: Cape May
Dates Monitored: April 29, 30, May 1 and 2, 2025
Case Number: CM-12-25

Funding Sources:

Program	Funding Award
Title I, Part A	50,761
Title I SIA	0
Title II, Part A	2,928
Title III	0
Title III Immigrant	0
Title IV, Part A	10,000
IDEA Part B, Basic and Preschool	51,659
Perkins V	0
Total Funds	<hr/> 115,348 <hr/>

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Background

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

The NJDOE visited the Cape May City Elementary School (CMCES 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 CMCES 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); 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

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

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

Expenditures Reviewed

The grants and programs reviewed included Title I, Title II-A, Title III, Title IV-A, IDEA Basic and Preschool from July 1, 2024 through March 8, 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

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.

CMCES is a PreK–6 school district and operates a targeted assistance program in its Title I funded school. In FY 2025, the district is using its Title I funds for instructional staff in-class support, as well as instructional supplies and 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.

CMCES utilizes its Title II-A funds to enhance instructional quality by providing high-quality professional development in English Language Arts, Mathematics, and Technology. Targeted professional development to support multilingual learners is provided through partnerships with Stockton University and Rutgers University using Title II-A funds as well.

Title III Projects

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

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

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, CMCES did not receive a Title III allocation. 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.

CMCES utilizes its Title IV-A funds to enhance well-rounded educational opportunities for all students. These funds also support the implementation of an after-school academic program specifically designed to provide targeted interventions in English Language Arts and Mathematics for students requiring additional support. Furthermore, Title IV-A funds are being

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

used for instructional materials for STEM¹ education, Music, and American Sign Language, thereby enriching the district's academic and cultural programming.

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 from Cape May County Special Services School District. IDEA Preschool funds are being used to purchase classroom supplies and materials for preschool students with disabilities.

Detailed Findings and Recommendations

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 programmatic findings and fiscal findings which are addressed below and more broadly, in the Administrative Section.

Finding 1:

The district did not provide documented evidence that it conducted a comprehensive needs assessment (CNA) which included the active participation of all representative stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, outside community members). Also, the CNA seemed to repeat many of the same elements that had appeared in the CNAs in the district's ESEA Consolidated Subgrant Applications from the last several years, with no direct connection to data analysis. Since the

¹ The acronym "STEM" stands for Science, Technology, Engineering and Mathematics.

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

CNA is an ongoing process, not a one-time event, the district must institute processes and/or procedures to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families.

Citation(s):

ESEA §1112(c)(6) Local Educational Agency Plans: Assurances

Required Action(s):

As part of the submission of its corrective action plan (CAP), the district must submit evidence of established processes and/or procedures to ensure:

- The CNA includes a thorough analysis of both quantitative and qualitative data to identify specific needs for students, staff, and/or parents and families.
- The CNA process involves all relevant stakeholders including administrators, instructional staff, non-instructional staff, support personnel, parents and families, and outside community members.

Recommended Action(s):

It is important to note that the CNA serves as the basis for which all budgeted costs are determined to be necessary, reasonable, and allocable to the Title I, Part A grant program (as well as to all other ESEA title programs). Consequently, it is recommended the district institute the following steps for the development of a more robust annual CNA that clearly articulates the identified needs not only for the FY 2026 ESEA project period, but also for all subsequent ESEA project periods:

- Assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA.
- Include more specific and quantifiable details for each identified need. This may be accomplished by providing more exact and specific information regarding each identified need (e.g., target populations, grade levels, performance targets, academic and non-academic outcomes, root causes of the needs, evaluation of prior year outcomes, etc.).
- Ensure the active engagement of parents and families, as well as outside community members in the development, implementation, and ongoing monitoring of the CNA.
- Incorporate a formal evaluation process as part of the CNA to strengthen the required progress monitoring elements (evaluation) as articulated in ESEA.

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Finding 2:

The district did not provide evidence to show how it actively engaged parents and families in the development of the board approved district/school-level parent and family engagement policy. Pursuant to ESEA legislation, parents and families must be involved in the development of the written district/school-level parent and family engagement policy, as well as be informed of the ways in which they can further participate in the academic performance and achievement of their children.

Citation(s):

ESEA §1116(a)(1) Parent and Family Engagement: Local Educational Agency Policy and (b)(1) Parent and Family Engagement: School Parent and Family Engagement Policy

Required Action(s):

The district must ensure that it has a written district/school-level parent and family engagement policy that is board approved, annually. The district/school-level parent and family engagement policy must be developed and reviewed with the active engagement of parents and families, as well as be widely distributed to parents and families on an annual basis. In this way, parents and families are afforded opportunities to become effective partners in the district's ongoing parent involvement process. As part of the submission of its CAP, the district must submit copies of the processes and/or procedures in place to ensure compliance with this ESEA requirement.

Recommended Action(s):

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

Finding 3:

The district did not provide evidence that parents and families were actively involved in the development of the school-parent compact. Pursuant to ESEA legislation, the school-parent compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the challenging State academic standards.

Citation(s):

ESEA §1116(d) Parent and Family Engagement: Shared Responsibilities for High Student Academic Achievement

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Required Action(s):

The district must ensure it has a school-parent compact in place for its Title I-funded school. In addition, the district must include parents and families in the ongoing monitoring, continued development and implementation of all elements of the approved school-parent compact. The development and distribution of a school-parent compact must:

1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the served children to meet the challenging State academic standards, and the ways in which each parent will be responsible for supporting their children's learning. The school-parent compact also must detail the ways parents can volunteer in their child's classroom and participate, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time.
2. Address the importance of ongoing communication between teachers and parents through, at a minimum —
 - a. parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement;
 - b. frequent reports to parents on their children's progress;
 - c. reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities; and
 - d. regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand.

As part of the submission of its CAP, the district must submit copies of the processes and/or procedures in place that include a description specifying how the district includes parents and families in the ongoing monitoring, continued development and implementation of all elements of the school-parent compact.

Additional Recommendation(s):

It was noted that very few parents attended the required annual Title I parent meeting. The NJDOE would like to recommend that the district consider changing their method(s) of outreach in order to receive a better response from parents. If transportation is a barrier, the district should consider meeting in a more centralized location (e.g., 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. The district should also consider holding the meeting virtually, as well as in person. Additionally, the district should survey parents to see what time of day or evening would best accommodate the majority of attendees.

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Title II-A

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

Finding 1:

The district provided for examination purchase order (PO) number 25D00020 issued to Stockton University in the amount of \$600 for professional development through a consortium. The district, however, did not furnish copies of the corresponding invoice as requested. Rather, alternate documentation was furnished to substantiate the allowability of this expenditure. Even so, sound business practices and an effective system of internal controls necessitate the district's business office staff:

1. receive invoices from vendors prior to payments for goods and services;
2. maintain the invoices on file in accordance with state regulations governing retention of the LEA's financial records; and
3. produce invoices requested for examination during audits or monitorings by NJDOE.

Citation(s):

Uniform Grant Guidance, §200.302 Financial management, §200.303 Internal controls, and Subpart E – Cost Principles §200.403 Factors affecting allowability of costs

Required Action(s):

As a part of the submission of its CAP, the district is required to submit a copy of its PO for similar services in 2025-2026, and the corresponding invoice via the CFM Homeroom Application. If the district does not provide these records, the NJDOE may conduct a comprehensive review of non-payroll transactions charged to FY 2026 Title II-A awards to ensure the proper maintenance of invoices in conjunction with its CAP follow-up procedures.

Title III

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

Title IV-A

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

IDEA

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

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

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 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—

- 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.
- A stand-alone Purchasing Manual for incorporation by reference in the written cost allowability procedures and for use by district staff.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.112 Conflict of interest, 2 C.F.R. §200.113 Mandatory disclosures, §200.302(b)(6)-(7) Financial management, §§200.317 – 200.327 Procurement Standards 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.

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Finding 2:

The district is improperly using the same revenue code, 4420, for IDEA Basic and Preschool. The district should utilize a distinct revenue code, such as 4421, for IDEA Preschool

Citation(s):

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 utilize the UMCOA to ensure the proper recording of revenues and expenditures in its accounting records.

Finding 3:

The district transferred Title IV-A funds totaling \$2,000 from line item 100-100. Of this figure, \$1,000 was reallocated to 100-300 in which no funds were previously budgeted and \$1,000 was moved to 100-600. The cumulative amount transferred is equivalent to 20% of the total award. These circumstances – the appropriation of funds in an unopened line item and aggregate budgetary transfers of funds between line items in excess of 10% – are among several which necessitate the filing of an amendment application.

Citation(s):

[ESEA Amendment Instructions](#) and UMCOA

Required Action(s):

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

Finding 4:

The district's Subsidiary Ledger – All Accounts (SLAA) report for Title I could not be reconciled with corresponding state approved budget amounts in the EWEG system. Specifically, the SLAA report does not include a separate reserve of \$100 for students experiencing homelessness in line item 100-600. Please note that a unique subcode must be included in the account number utilized for this reserve. Amounts expended for this set-aside 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.

Additionally, the Title I Budget Report provided for examination did not include carryover of \$201.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(3) Financial management and UMCOA

Cape May City Elementary School
Collaborative Monitoring Report
June 2025

Required Action(s):

The district must implement a process to ensure that appropriations of all federal grants are recorded appropriately in its financial records. As part of the submission of its CAP, the district is required to run and upload copies of Budget Report and the supporting SLAA reports on the same date for Title I for the period July 1, 2024 through June 30, 2025 via the CFM Homeroom Application.

Finding 5:

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

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.

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.