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Department of Education
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East Newark School

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New Jersey K to 12 Education

Collaborative Monitoring Report
June 2025

District: East Newark School
County: Hudson
Dates Monitored: May 13, 14, 15 and 16, 2025
Case Number: CM-13-25

Funding Sources:

Program	Funding Award
Title I, Part A	275,089
Title I SIA	0
Title II, Part A	37,578
Title III	10,538
Title III Immigrant	7,221
Title IV, Part A	27,135
IDEA Part B, Basic and Preschool	75,638
Perkins V	0
Total Funds	433,199

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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 East Newark School (ENS 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 ENS 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

The grants and programs reviewed included Title I, Title II-A, Title III, Title III Immigrant, Title IV-A, IDEA Basic and Preschool from July 1, 2024 through April 11, 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.

ENS is a K–8 district that operates a schoolwide program model in its Title I-funded school. The district utilizes its FY 2025 Title I funds primarily for:

1. instructional staff to operate in-class support and pull-out programs;
2. instructional supplies and materials;
3. increased learning time; and
4. extended day/year programs.

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, ENS uses its Title II-A funds to recruit, hire, and retain highly effective teachers in English Language Arts and Mathematics. Additionally, these funds are utilized to support the recruitment of qualified individuals from other fields, including comprehensive health and physical education. Title II-A funds are also being used for high-quality, personalized professional development across various subjects, and in-service training to enhance the skills and effectiveness of school personnel.

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

In FY 2025, ENS uses its Title III funds for professional development on the Sheltered Instruction Observation Protocol, and parent and family engagement.

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, ENS is using its Title III Immigrant funds for the following:

1. Extended/day and afterschool programs.
2. Professional development for teachers and paraprofessionals in culturally responsive teaching, language acquisition strategies, and scaffolded instruction techniques to better support and engage immigrant learners in the classroom.
3. Materials, supplies, and technology to support immigrant students by providing culturally relevant resources, necessary learning tools, and access to language learning software, and digital aid to ensure language acquisition and comprehension.

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.

ENS utilizes its Title IV-A funds to enhance programs and activities that promote the safety and well-being of all students. The district's use of these funds has been instrumental in supporting bullying and harassment prevention initiatives. Additionally, Title IV-A resources are being used to acquire instructional materials for digital media, helping to address gaps in student readiness and support a well-rounded education.

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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 used to reduce district tuition costs for students receiving special education services in approved private schools for 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 the following programmatic findings and no fiscal findings.

Finding 1:

In reviewing the Annual School Plan (ASP) for ENS, the following items were noted:

1. There were only two stakeholder team meetings during the school year.
2. Board meeting minutes or sign-in sheets were not provided. A screen capture was furnished for one of the meetings, but it appears to be from the meeting invitation and does not suffice as evidence of attendance. A blank sign-in sheet was provided for the other meeting.

In summary, board meeting minutes and sign-in sheets with the participants' signatures must be maintained by the district as evidence to support that a robust conversation of the ASP has occurred.

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Citation(s):

ESEA §1114(b) Schoolwide Programs: Schoolwide Program Plan

Required Action(s):

As part of the submission of its corrective action plan (CAP), the district must submit a copy of the processes and/or procedures the district established to ensure that for the 2025-2026 school year:

1. Meetings are held at various times throughout the year. It is recommended that meetings are held quarterly, at a minimum.
2. Proper documentation is maintained to support all meetings, including copies of the agendas, meeting minutes, and sign-in sheets.

Recommended Action(s):

To further enhance knowledge regarding the completion of the ASP, it is recommended the district's administrators and staff review the [ASP Resources page](#) in NJ Homeroom.

Finding 2:

The district did not provide documented evidence that it conducted a comprehensive needs assessment (CNA) including the active participation of all representative stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, outside community members). Since the 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 CAP, the district must submit evidence of established processes and/or procedures to ensure:

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

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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 titled 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:

1. Assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA.
2. 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.).
3. Ensure the active engagement of parents and families, as well as outside community members in the development, implementation, and ongoing monitoring of the CNA.
4. Incorporate a formal evaluation process as part of the CNA to strengthen the required progress monitoring elements (evaluation) as articulated in ESEA.

Additional Recommendation and Action Required:

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

1. 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 to receive a better response from parents. 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. 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 most attendees.
2. When preparing the 2025-2026 ESEA Consolidated Subgrant Application in the Electronic Web-Enabled Grant system, please ensure that the correct information is entered in the Homeless Students tab. Specifically, the district must ensure:
 - a) The correct Needs Assessment methodology is selected.
 - b) The correct Homeless Students Reserve method is selected.

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- c) The narrative includes a detailed description on how the homeless reserve will be used for children and youths experiencing homelessness to support their enrollment, attendance, and academic success.

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 no programmatic or fiscal findings.

Title III Immigrant

The review of the district's 2024-2025 Title III Immigrant 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 or fiscal findings.

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.

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 suspension and debarment does not include or reference:

- proper citation of §200.214;
- the applicability to contracts or purchase orders over \$25,000 unless the district chooses a lower threshold; and
- the requirement to demonstrate compliance with written evidence.

Moreover, the district did not provide 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.

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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.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment, §200.302(b)(6)-(7) Financial management, §§200.400 – 200.476 Subpart E - Cost Principles, 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.

Finding 2:

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.