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Laurel Springs School

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New Jersey K to 12 Education

**Collaborative Monitoring Report
August 2025**

District: Laurel Springs School
County: Camden
Dates Monitored: May 27, 28, 29 and 30, 2025
Case Number: CM-14-25

Funding Sources:

Program	Funding Award
Title I, Part A	54,679
Title I SIA	0
Title II, Part A	12,904
Title III	0
Title III Immigrant	0
Title IV, Part A	16,196
IDEA Part B, Basic and Preschool	67,962
Perkins V	0
Total Funds	<hr/> 151,741 <hr/>

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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 Laurel Springs School (LSS 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 LSS 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

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

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Expenditures Reviewed

The grants and programs reviewed included Title I, Title II-A, Title III, 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

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.

LSS is a PreK–6 school district and operates a targeted assistance program its Title I funded school. The district utilizes its FY 2025 Title I funds primarily for an instructional staff pull-out program, instructional materials and supplies, increased learning time, and 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, LSS uses its Title II-A funds to provide high-quality, personalized professional development across various subjects, as well as for in-service training to enhance the skills and effectiveness of school personnel.

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;

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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, LSS 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.

LSS uses its Title IV-A funds to enhance programs and initiatives that support the safety and well-being of all students. These funds play a vital role in implementing bullying and harassment prevention efforts. Additionally, Title IV-A funds are being used to support the creation of wellness-focused extracurricular activities, such as a running club and yoga sessions, fostering both physical and mental health.

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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 funds are being used to reduce district tuition costs for students receiving special education services. IDEA Preschool funds are being used to cover the costs of behavioral consultant services 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 the programmatic finding below and a fiscal finding which is addressed more broadly, in the Administrative Section.

Finding 1:

The district did provide evidence that it convened an annual Title I meeting for parents and families of participating children; however, the meeting did not take place until November 14, 2024. Pursuant to ESEA legislation, a Title I-funded school must convene an annual meeting at the beginning of the school year, to inform parents and families of the school's Title I, Part A program(s), the Title I, Part A legislative requirements, and the ways in which parents and families can be engaged actively in helping their children succeed academically.

Citation(s):

ESEA §1116(c) Parent and Family Engagement: Policy Involvement

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Required Action(s):

The district must ensure that its Title I-funded school holds an annual, Title I, Part A meeting at the beginning of each school year (no later than the first week in October or earlier). To document the annual meeting, the district must maintain the following information on file:

1. invitational letter/flyer;
2. meeting agenda;
3. meeting minutes; and
4. sign-in sheets or a list of the names of staff and parents who attended the meeting.

Each piece of documentation must include the exact date on which the annual, Title I, Part A meeting was held. As part of the submission of its corrective action plan (CAP), the district must submit evidence of processes and/or procedures in place to ensure the required annual Title I, Part A meeting takes place at the beginning of the 2025-2026 school year.

Recommended Action(s):

It was noted that very few parents attended the required annual Title I, Part A 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.

Additional Recommendation(s):

The following recommendations are presented to assist the district in continuing to strengthen and enhance its Title I, Part A programs and services:

1. The NJDOE recommends that the district ensures that all required stakeholders participate in the development, implementation, and ongoing monitoring of the comprehensive needs assessment. Based on conversations with the district, they have indicated and substantiated that the requirements are being met, and noted that the district is very small and some of its procedures are informal. Moving forward, the district should maintain meeting minutes and agendas on file.
2. The NJDOE recommends that the district continues to enhance their services to all eligible English Learner students. The district has indicated that they are only in the second year of their program. The district should refer to the department's [Title III website](#) for additional resources.

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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.

Title III

The review of the district's 2024-2025 Title III programs yielded the following programmatic findings.

Finding 1:

The district did not have a written process for monitoring former MLs.

Citation(s):

ESEA §3121(a)(2) Reporting: In General

Required Action(s):

As part of the submission of its CAP, the district must submit a written process for monitoring former MLs.

Recommended Action(s):

The district may wish to use the [sample monitoring tool](#) as part of its written process for monitoring former MLs.

Finding 2:

The district did not have a written process for re-identification and re-entry of former MLs.

Citation(s):

ESEA §3121(a)(2) Reporting: In General

Required Action(s):

As part of the submission of its CAP, the district must submit the process used for the re-identification and re-entry of former MLs.

Newly exited students who are not academically progressing in classes where English is the primary language of instruction may be considered for re-entry to a Language Instruction Educational Program (LIEP) as follows:

1. After a minimum of one-half academic year and within two years of exit, the teacher delivering instruction in English may recommend retesting, provided approval is obtained from the principal.
2. A waiver of the minimum time limitation may be approved by the executive county superintendent upon request of the chief school administrator if the

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student is experiencing extreme difficulty in adjusting to classes where English is the primary language of instruction.

3. The recommendation for retesting shall be based on the teacher's documented observation of a student's academic performance and data-based determination that the student is experiencing difficulties due to problems in using the English language to communicate effectively with peers and adults; understand directions given by the teacher; and/or comprehend basic verbal and written materials.
4. The student shall be tested using a different form of the English language proficiency assessment than the one used to exit the student from the LIEP.
5. If the student scores below the department-determined cut score on the English language proficiency assessment, the student shall be reenrolled into an LIEP.

Title IV-A

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

IDEA

The review of the district's 2024-2025 IDEA programs yielded no programmatic findings and a fiscal finding which is 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 examined lacked mention of Uniform Grant Guidance (UGG) requirements pertinent to Federal awards and/or relevant citations. For example, the district's policy on:

- Mandatory Disclosures omits the requirement to promptly disclose, in writing to the Federal awarding agency or to NJDOE, violations of Federal criminal laws stemming from conflict of interest violations; and
- Travel, and Suspension and Debarment does not include applicable citations to UGG.

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. §200.113 Mandatory disclosures, §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.

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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.