

**State of New Jersey
Department of Education
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The Queen City Academy Charter School
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New Jersey K to 12 Education

**Collaborative Monitoring Report
August 2019**

District: Queen City Academy Charter School
County: Union
Dates On-Site: April 2 and 3, 2019
Case #: CM-006-19

Funding Sources

Program	Funding Award
Title I, Part A	\$176,145
IDEA Basic	62,397
Title II, Part A	17,863
Title III	22,211
Title IV	12,315
Total Funds	<hr/> <u>\$1,467,603</u>

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Background

The Elementary and Secondary Education Act (ESSA) and the Individuals with Disabilities Act (IDEA) and other federal laws require that districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., ESSA and IDEA). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by subrecipients and determine whether the funds are being used by the school for their intended purpose and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited Queen City Charter School to monitor the schools use of federal funds and the related program plans, where applicable, to determine whether the schools programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I; Title II, Part A; Title III; Title IV, Part A and IDEA Basic for the period July 1, 2018 through March 31, 2019.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech-language specialists and an interview of the program administrator regarding the IDEA grant, as well as current school policies and procedures. The monitoring team members also conducted interviews with school personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

Expenditures Reviewed

The grants reviewed included Title I, Title II, Title III, Title IV and IDEA Basic from July 1, 2018 March 31, 2019. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General District Overview of Uses of IDEA Funds

Title I Projects

The school operates a targeted assistance program and used its Title I funds for the following activities: teacher salaries for in-class, pull-out, and extended day/year activities; instructional supplies and materials; and professional development activities.

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Title II-A Projects

Queen City Charter School used Title II-A funds for professional development and the mentoring of teachers in the practices of literacy skills such as Guided reading and cueing systems. The district also used funds to support the recruitment of teachers for positions that are hard to fill.

Title III Projects

No Title III funds had been expended as of the date of the site visit.

Title IV-A Projects

Queen City Charter School used Title IV-A funds to support STEM activities such as *Project U.S.E.*, a boatbuilding experience and competition, youth mentoring programs and health activities.

IDEA Projects (Special Education)

The FY 2019 IDEA funds were used to partially fund the salary and benefits of two special education teachers.

Detailed Findings and Recommendations

Title I

Finding 1:

Although the school provided evidence of a school-parent compact, this evidence did not verify the school-parent compact was developed in conjunction with Title I parents and families. The absence of parent/family participation in developing these required documents excludes parents/families from more active participation in their children's educational programs.

Citation:

ESEA §1116(c)&(d): (Policy Involvement and Shared Responsibilities for High Student Academic Achievement)

Required Action:

For the FY 2019-2020 project period, the school must include families, parents, and students in the development of the required school-parent compacts. This work must be documented by a recorded agenda, meeting minutes, and sign-in sheets, which must be kept on file in the school and made available upon request of the New Jersey Department of Education (NJDOE).

Finding 2:

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The school provided evidence of distribution of the required Parents Right to Know Letter; however, the letter referenced the *No Child Behind Act of 2001 (NCLB)* instead of the *Elementary and Education Act of 1965 (ESEA)*, as amended by the *Every Student Succeeds Act of 2015 (ESSA)*.

Citation:

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

Required Action:

Beginning with the 2019-2020 *ESEA* project period, the school must update the Parents Right to Know Letter, as well as all other *ESEA* correspondence, to include reference to *ESEA* rather than *NCLB*.

Finding 3:

The selected professional development activities did not align with the identified academic needs. The Needs Assessment, as articulated in the school's FY 2019 *ESEA* Consolidated Subgrant Application, serves as the basis for determining whether proposed uses of Title I funds are necessary and reasonable. Without a direct connection to the Needs Assessment, professional development activities are not necessary and reasonable for proper and efficient performance and administration of the school's Title I program. As a result, unless the school's Needs Assessment is modified to show a direct alignment between these proposed activities and the identified academic needs, the proposed activities are unallowable.

Citation:

ESEA §1112 Local Educational Agency Plans; Uniform Grant Guidance Cost Principles for State, Local and Indian Tribal Governments (Necessary and Reasonable)

Required Action:

The school must revise its Needs Assessment in the FY 2019 *ESEA* Consolidated Subgrant Application, to show an alignment between identified academic needs and the proposed professional development activities or delete these proposed activities from the Program Plan and Title I Budget sections of the FY 2019 *ESEA* Consolidated Subgrant Application.

Recommended Action:

For the 2019-2020 *ESEA* project period, it is recommended the school ensure the information contained in the Needs Assessment is quantitative in nature. This may be accomplished by providing more exact and specific details regarding each identified need (e.g. grade levels, sub-populations, numbers or percentages of parents, etc.).

Finding 4:

The school's Saturday academy program focused on serving those students who were proficient or advanced proficient as measured by the state assessment. Since the school operates a targeted

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assistance program, it must focus Title I-funded services solely on academically at-risk students as identified by the school's established entrance criteria.

Citation:

ESEA §1115(c)(B): Targeted Assistance Schools: (Eligible Children from Eligible Population)

Required Action:

Since the school will operate a targeted assistance program during the 2019-2020 *ESEA* project period, **only identified, academically at-risk students may receive benefit of Title I-funded services**. Of course, all programs must be predicated upon the identification of specific needs as articulated in the school's Needs Assessment. To this end, examples of how the school may use Title I funds to prepare low-achieving students to participate successfully in advanced coursework, such as AP or IB courses, or gifted and talented programs, include the following:

1. Title I funds could be used to provide intensive summer school classes for low-achieving 5th and 6th grade students, to prepare them for the rigors of taking advanced courses in 7th and 8th grades.
2. Title I funds may be used to provide after-school tutoring for low-achieving students who currently take advanced courses.
3. Title I funds may be used to offer elective courses that would prepare low-achieving students to take advanced courses.
4. Title I funds may be used to provide professional development to Title I teachers regarding how to prepare low-achieving students to participate successfully in advanced coursework (gifted and talented programs).
5. Title I funds may be used to purchase or develop supplemental instructional materials aimed at improving the ability of low-achieving students to participate successfully in advanced coursework (gifted and talented programs).

Recommended Action:

The school is encouraged to consider transitioning to a Title I schoolwide program for the 2020-2021 school year. [Information on Schoolwide Programs](https://www.state.nj.us/education/title1/program/schoolwide.shtml) can be found here: <https://www.state.nj.us/education/title1/program/schoolwide.shtml> on the Department's website.

Finally, the school may want to consider the use of Title IV funds for the provision of gifted and talented programs to all students. The Title IV grant program authorizes a wide range of activities to improve student academic achievement by increasing the capacity of schools to: 1) Provide all students with a well-rounded education; and 2) Increase access to personalized, rigorous learning experiences supported by the use of technology to improve academic achievement and digital literacy of all students.

Finding 5:

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The school selected the following allowable uses in its Program Plan: *Equipment for Title I Program and Professional Development Activities*; however, the school's Needs Assessment, as articulated in the FY 2019 ESEA Consolidated Subgrant Application, did not identify specific needs aligned with either allowable use.

Citation:

2 CFR §200.404 and §200.405 Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)

Required Action:

The school must remove the selected allowable uses of *Equipment for the Title I Program and Professional Development Activities* from the Program Plan or revise the Needs Assessment to show a specific identified need for which Title I funds will be used to address these two selected allowable uses.

Finding 6:

The school selected the following allowable uses in its Program Plan: *Equipment for Title I Program and Parent and Family Engagement*; however, the Title I Budget did not include any budgeted costs for either allowable use.

Citation:

2 CFR §200.404 Cost Principles: Subpart E (Reasonable Costs)

Required Action:

The school must remove the selected allowable uses of *Equipment for the Title I Program and Parent and Family Engagement* from the Program Plan. For Parent and Family Engagement, although the school's Needs Assessment identified a specific need aligned with this selected allowable use, unless Title I funds are budgeted for this purpose, this allowable use must be deleted from the school's Program Plan and the Needs Assessment must be revised to delete Parent and Family Engagement as a need under Title I, Part A.

Finding 7:

The school did not provide the required supporting documents to verify the time and activity for the teachers whose salaries were supported with Title I funds, as required by federal law. This type of documentation must reflect what the staff is doing, when and where they are working, and it must match their funded percentage, as well as be signed by the staff member and supervisor. This documentation is necessary to verify that funded-staff are performing allowable Title I activities.

Citation:

2 CFR §200.404 Cost Principles: Subpart E (Compensation – personal services)

Required Action:

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The school must verify the time and activity of staff charged to the Title I grant, to reflect the actual time allotted to Title I activities with staff and supervisor signatures. The school must submit a list of FY 2019 Title I funded staff, salaries, funding percentages, and appropriate time sheets to the NJDOE for review. The district must revise the Title I budget section of its FY 2019 *ESEA* Consolidated Subgrant Application, to include Title I funding for the salary of Teacher 1 at an amount equivalent to 97% of the teacher's time spent on the provision of Title I services. In addition, the salary of Teacher 2 must be revised to include Title I funding at an amount equivalent to 90% of the teacher's time spent on the provision of Title I services.

Finding 8:

The school budgeted \$4,791 for "*scholar software programs*;" however, this was insufficient in its detail to determine whether these types of Instructional Materials and Supplies constitute an allowable use of Title I funds.

Citation:

2 CFR §200.453 Cost Principles: Subpart E (Materials and Supplies Costs)

Required Action:

The school must revise the description for "*scholar software programs*," to include more specific details on the exact types of Instructional Materials and Supplies that constitute software programs.

Title II

A review of the expenditures charged to the Title II grant yielded no findings.

Title III

A review of the expenditures charged to the Title III grant yielded no findings.

Title IV

A review of the expenditures charged to the Title IV grant yielded no findings.

IDEA (Special Education)

Finding 9:

The school did not consistently document required participants attended meetings for students eligible for speech-language services. Specifically, the general education teacher did not consistently attend annual review meetings.

Citation:

N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a)

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Required Action:

The school must ensure that meetings are conducted with required participants. In order to demonstrate correction of noncompliance, the school must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff and review meeting documentation for meetings conducted between September 2019 and December 2019 and review the oversight procedures.

Finding 10:

The school did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services. Specifically, IEPs did not consistently include the results of the most recent evaluations; did not consistently document an explanation of the extent, if any, to which the student shall not participate with nondisabled students in the general education class and in extracurricular and nonacademic activities; and, did not consistently include a statement of supports for school personnel.

Citation:

N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f) N.J.A.C. 6A:14-4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2)

Required Action:

The school must ensure that IEPs for students eligible for special education and services contain all required components. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct IEP meetings with an appropriately configured IEP team and revise the IEPs that were determined noncompliant. A monitor from the NJDOE will conduct a site visit to interview staff and review IEPs for meetings conducted between September 2019 and December 2019 and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the charter school by the special education monitor.

Finding 11:

The school did not consistently document in the IEPs of students eligible for special education and related services the relevant factors considered when determining whether a student requires an extended school year program (ESY).

Citation:

N.J.A.C. 6A:14-4.3(c)

Required Action:

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The school must ensure that consideration of ESY is documented in the IEP. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from NJDOE will conduct a site visit to interview staff, review the revised IEPs, a random sample of IEPs developed at meetings conducted between September 2019 and December 2019, and review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the school by the special education monitor.

Finding 12:

The school did not consistently complete transition planning for students ages 14 and above and document decisions in the IEP. Specifically, IEPs did not consistently include:

- a statement of the student's strengths, interests and preferences;
- the name or position of a staff person responsible to serve as liaison to post-secondary resources;
- the need for consultation with other agencies, if applicable, and a statement of needed interagency linkages and responsibilities.

Citation:

N.J.A.C. 6A:14-3.7(e)11

Required Action:

The school must ensure that transition is discussed at each IEP meeting for students age 14 or above, and that decisions are documented in the IEP. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant. A monitor from the NJDOE will conduct a site visit to interview staff, review a random sample of IEPs developed between September 2019 and December 2019, and review the oversight procedures.

Administrative

Finding 13:

The board minutes contained - for fully and partially funded employees - some but not all the required information such as account number, position, annual/funded salary and percentage charged. Also, the board minutes contained - for stipend compensation - some but not all of the

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required information such as account number, position, hourly rate, number of hours and not to exceed amount.

Citation:

Uniform Grant Guidance 2 C.F.R. 200.302.

Required Action:

The school should update its internal controls to ensure that the board minutes contain the required information.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@doe.nj.gov.