

**State of New Jersey  
Department of Education  
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**Classical Academy Charter School of Clifton**  
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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2020

**District:** Classical Academy Charter School of Clifton  
**County:** Passaic  
**Dates On-Site:** February 12, 2020  
**Case #:** FM-004-20

**Funding Sources**

Program	Funding Award
Title I, Part A	\$ 38,446
Title II	5,923
Title IV, Part A	10,000
IDEA Basic	17,854
Total Funds	<hr/> <u>\$72,223</u>

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Background**

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The Every Student Succeeds 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 purposes and achieving the overall objectives of the funding initiatives.

**Introduction**

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The NJDOE visited the Classical Academy Charter School of Clifton (the charter school) to monitor the school’s 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’s 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, Title IV and IDEA Basic for the period July 1, 2019 through January 31, 2020.

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 (IEPs), 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**

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The grants reviewed included Title I, Title II, Title IV and IDEA Basic from July 1, 2019 through January 31, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**General District Overview of Uses of Federal Funds**

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**Title I Projects**

The charter school serves grades 6–8 and operates a targeted assistance program. The established entrance and exit criteria for the charter school include teacher recommendations, teacher rating scales; and grades. During the 2019-2020 school year, the charter school programmed and budgeted its Title I, Part A allocation for the following activities: 1) instructional staff in-class support program; and 2) instructional materials and supplies.

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Please Note:** The school business administrator for Classical Academy Charter School of Clifton is new to this position in the charter school.

**Title II Projects**

The charter school plans to use their Title II-A allocation to train teachers on the use of differentiation and data tracking to work with and improve programs for at-risk students.

**Title IV Projects**

The charter school plans to use Title IV-A funds to strengthen the English Language Arts program by infusing writing into the curriculum; for bullying prevention workshops involving parents, teachers, students and school board members, and for Science, Technology, Engineering, Arts, & Math (STEAM) programs.

**IDEA Projects (Special Education)**

IDEA funds are utilized for the provision of classrooms supplies for special education classrooms as well as for professional development opportunities for teachers serving special education students. There were no findings with the IDEA grant.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

As articulated in the charter school’s FY 2020 ESEA Consolidated Subgrant Application, the Needs Assessment indicated Title I funds would address the following identified needs:

- “English Language Arts Literacy Supplementation through the implementation of an after-school tutoring program and the purchase of an online writing enhancement module for the entire student population.”

Unfortunately, the selected allowable uses of “In-Class Support” and “Instructional Supplies and Materials” for mathematics instruction did not align with the above referenced identified need. Without a direct connection among identified needs, allowable uses, and budgeted costs, there is no evidence that implemented activities are necessary and reasonable for proper and efficient performance and administration of the charter school’s Title I targeted assistance program.

**Citations:**

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

**Required Action:**

The charter school must establish policies and processes to ensure the information in the Needs Assessment of its FY 2021 ESEA Consolidated Subgrant Application accurately

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

reflects the identified need(s) for the academically at-risk students, as well as the needs of those students' teachers and parents. In addition, the charter school needs to ensure a more direct alignment of the identified academic needs, with the proposed allowable uses and associated budgeted costs.

**Recommended Action:**

Regarding the charter school's FY 2021 ESEA Consolidated Subgrant Application, the following recommended actions, per application section, were discussed with charter school staff:

- Needs Assessment:
  - Ensure information contained in the Needs Assessment is more specific and quantifiable in nature. This may be accomplished by providing more exact details for each identified need (e.g. grade levels, student groups, grade spans, etc.).
- Program Plan:
  - Expand the type of criteria used to identify students for entrance to and exit from the charter school's targeted assistance program model.
  - Describe the exact duties to be performed for instructional staff positions in both in-class support and pull-out programs.
- Budget:
  - Provide specific details to describe the type and quantity of "Instructional Materials and Supplies" to be funded with Title I, Part A monies. Listing "writing curriculum supports" is not sufficient detail to determine if this proposed cost is allowable under the Title I, Part A program.

**Finding 2:**

The charter school did not provide evidence of district-level policies and procedures regarding the Educational Stability of Children in Foster Care. The charter school did not provide evidence that a staff person had been designated as the Foster Care liaison.

**Citations:**

ESEA §1111; §1112 Educational Stability for Children in Foster Care

**Required Action:**

The charter school must establish policies and procedures regarding the Educational Stability of Children in Foster Care, designate a staff person as the Foster Care liaison, and post this information on its website. The name of the designee must be identified in the CDS file, with a printout available for review.

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Recommended Action:**

The charter school is encouraged to access the NJDOE website [Educational Stability for Children in Foster Care](#) for specific information regarding the establishment of its Educational Stability policies and procedures, as well as the responsibilities of the district Foster Care liaison.

**Title II**

The review of the Title II program yielded no findings.

**Title IV**

The review of the Title IV program yielded no findings.

**IDEA (Special Education)**

**Finding 1:**

The charter did not consistently provide parents of students referred and/or eligible for special education and related services, notice of a meeting for annual reviews, reevaluation planning, and eligibility meetings.

**Citations:**

N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a)

**Required Action:**

The charter must provide parents notice of a meeting in writing that contains all required components, early enough to ensure they have an opportunity to attend. In order to demonstrate correction of noncompliance, the charter must conduct training for child study team members 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, review meeting documentation for meetings to be conducted at a time to be determined later. A review of the oversight procedures will also take place at that later time.

**Finding 2:**

The charter did not consistently ensure that the required participants were in attendance at annual review, reevaluation planning, and eligibility meetings for students eligible for special education and related services.

**Citations:**

N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a)

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The charter must ensure that meetings are conducted with required participants and that documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student files. In order to demonstrate correction of noncompliance, the charter must provide training for child study team members 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, review meeting documentation, including the sign-in sheets, for meetings to be conducted at a time to be determined later. A review of the oversight procedures will also take place at that later time.

**Finding 3:**

The charter 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:

- Statement of how the student’s disability affects his/her involvement and progress in the general curriculum; and
- Strengths of the student.

**Citations:**

N.J.A.C. 6A:14-3.7(c)1 and 2

**Required Action:**

The charter must ensure that that each IEP contains all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the charter has corrected the individual instances of noncompliance, the charter 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, along with a random sample of IEPs developed at meetings to be conducted at a time to be determined later. A review of the oversight procedures will also take place at that later time. The names of the students whose IEPs were identified as noncompliant will be provided to the charter by the special education monitor.

**Finding 4:**

The charter did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education.

**Citations:**

N.J.A.C. 6A: 14-3.8(a) and 20 U.S.C. §1414(a)(2)

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The charter school must ensure reevaluations are conducted within required timelines. In order to demonstrate correction of noncompliance the charter school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review documentation of eligibility meetings held as part of the reevaluation process to be conducted at a time to be determined later. A review of the oversight procedures will also take place at that later time.

**Finding 5:**

The charter did not include the statement of transition from elementary to secondary in each IEP for students eligible for special education and related services.

**Citation:**

N.J.A.C. 6A:14-3.7(e)10

**Required Action:**

The charter must ensure that each IEP contains a statement of transition from elementary to secondary education. In order to demonstrate correction of noncompliance the charter 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 charter has corrected the individual instances of noncompliance the charter 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, along with a random sample of IEPs developed at meetings to be conducted at a time to be determined later. A review of the oversight procedures will also take place at that later time. The names of the students whose IEPs were identified as noncompliant will be provided to the district by the special education monitor.

**Finding 6:**

The charter does not employ child study team members who are employees of a local education agency. With the exception of a school social worker, primary child study team services are provided by contracted independent consultants.

**Citations:**

N.J.A.C 6A:14-3.1(B) and 5.1(a)1, 2, and 3

**Required Action:**

The charter must ensure that it employs or contracts with child study team members in accordance with the citations listed above. In order to demonstrate correction of

**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

noncompliance the charter must employ a learning disabilities teacher consultant, school psychologist, and speech therapist by way of hiring or contracting with a local education agency. A monitor from NJDOE will conduct a site visit to review child study team staffing and contracts.

**Administrative**

**Finding 1:**

The monitors noted that through February 12, 2020 the school had expended none of their federal funding for FY 2019/2020. The following is a summary of the year to date expenditures.

<b>Award</b>	<b>Total Allocation</b>	<b>Expended To February 12, 2020</b>	<b>Percent Expended</b>
Title I	\$38,446	\$0	0%
Title II	\$5,923	\$0	0%
Title IV	\$10,000	\$0	0%
IDEA Basic	\$17,854	\$0	0%

Failure to expend additional funds in accordance with the approved grant applications by their respective project period could result in the permanent loss of federal funds.

**Citation:**

UGG, 2 C.F.R. §200.302.

**Recommended Action:**

In order to avoid the potential loss of funds, where possible, the school should identify and charge appropriate expenditures to these grants by the end of their respective project period. The school must also implement internal controls to provide assurance that necessary internal controls are in place to prevent future lapsed funds in all program areas.

**Finding 2:**

The district failed to adopt a board resolution noting the submission and acceptance of federal funds.

**Citation:**

UGG, 2 C.F.R. §200.302.



**Classical Academy Charter School of Clifton  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

All federal grants should be formally accepted by board resolution.

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 (609) 376-3593 or via email at [steven.hoffmann@doe.nj.gov](mailto:steven.hoffmann@doe.nj.gov).