

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

**Freedom Prep Charter School**  
1000 Atlantic Ave.  
Camden, NJ 08104  
Phone: (856) 962-0766



*New Jersey K to 12 Education*

Collaborative Monitoring Report  
June 2020

**District:** Freedom Prep Charter School  
**County:** Camden  
**Dates On-Site:** January 27 and 28, 2020  
**Case #:** FM-010-20

**Funding Sources**

Program	Funding Award
Title I, Part A	\$1,106,321
Title III	25,045
IDEA Basic	187,130
IDEA Preschool	2,528
Total Funds	<hr/> <u>\$1,321,024</u> <hr/>

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Background**

---

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**

---

The NJDOE visited the Freedom Prep Charter School to monitor the school’s use of federal funds and the related program plans, where applicable, to determine whether the school’s 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 III, and IDEA Basic and Preschool for the period July 1, 2019 through December 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 (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**

---

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

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

---

**Title I Projects**

The Freedom Academy Charter School (the charter school) serves grades K-12 and operates a schoolwide program. During the 2019-2020 school year, the charter school programmed and budgeted its Title I,

Part A allocation for activities in the following areas: 1) instructional staff for in-class support and extended day/extended year programs; 2) instructional materials and supplies;

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

3) professional development; 4) parent and family engagement; and 5) college and career readiness.

**Title III Projects**

Title III funds are used for salaries, professional development, and parent programs.

**IDEA Projects (Special Education)**

The FY IDEA Basic funds are used for a social worker, an in-class teacher and paraprofessional at the elementary level to support students with disabilities. Preschool funds are used to support an in-class support teacher at the kindergarten level.

**Detailed Findings and Recommendations**

---

**Title I**

**Finding 1:**

The charter school did not provide documented evidence of its Annual Title I Meeting for parents and families of participating children, including showing the inclusion of:

1)invitational letter/flyer; 2) meeting agenda; 3) meeting minutes; and 4) sign-in sheets. Per the Education and Secondary Education Act (ESEA) legislation, a Title I-funded school must convene an annual meeting, 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:**

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

**Required Action:**

For the 2020-2021 school year, the charter school must convene its Annual Title I Parent meeting for parents and families of participating children to review documentation of annual reviews to be conducted within a period of time to be determined later. The charter school must keep on file documentation to verify the meeting's occurrence (i.e., invitational letter/flyer, meeting agenda, meeting minutes, and sign-in sheets). This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

**Finding 2:**

The charter school did not provide documented evidence of its district-school level parent and family engagement policy for the FY 2020 ESEA project period, to include when this policy was distributed to parents and families. Per 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 ways they can further participate in the academic performance and achievement of their children.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Citation:**

ESEA §1116 (a)(2): Local Educational Agency Policy: Written Policy; ESEA §1116(b)(1): School Parent and Family Engagement Policy

**Required Action:**

For the 2020-2021 school year, the charter school must engage parents and families in the development of a district-school level parent and family engagement policy. In addition, the charter school must ensure it distributes its written district-school level parent and family engagement policy to all parents and families of participating children. The charter school must keep on file documentation to verify parents and families were involved in the development of the written district-school level parent and family engagement policy, as well as documentation to verify distribution of this policy. This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

**Recommended Action:**

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

**Finding 3:**

The charter school did not provide documented evidence of the development and distribution of its school-parent compact. The school-parent compact must outline how parents, the entire charter school staff, and students will share the responsibility for improved student academic achievement and the means by which the charter school and parents will build and develop a partnership to help children achieve the challenging State academic standards. The exclusion of parents and families in the development of the school-parent compact resulted in these stakeholders being excluded from active participation in their children's educational programs.

**Citation:**

ESEA §1116(d)(2): Parent and Family Engagement (Shared responsibilities for High Student Academic Achievement).

**Required Action:**

For the 2020-2021 school year, the charter school must develop jointly, agree on, and distribute to parents and families of participating children its written school-parent compact. Parents and families shall be notified of the school-parent compact in an understandable and uniform format and, to the extent practicable, provided in a language they can understand. The charter school must keep on file documentation to verify the distribution of the school-parent compact to the parents and families of participating children. This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Recommended Action:**

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that the charter school staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Services at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

**Finding 4:**

The charter school provided evidence of the required Parent Right-to-Know letter; however, this letter was not dated, and the charter school did not provide evidence of the letter's distribution to all parents and families.

**Citation:**

ESEA §1112(e)(1): Parents Right to Know – Information for Parents

**Required Action:**

For the 2020-2021 school year, the charter school must distribute to all parents and families a dated Parent Right-to-Know letter and maintain documentation on file of this dated letter and its distribution. This documentation must be made available to the Office of Supplemental Educational Programs, upon request.

**Recommended Action:**

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that the charter school staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Services at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

**Finding 5:**

The charter school did provide evidence of district-level policies and procedures regarding the Educational Stability of Children in Foster Care; however, these policies and procedures were not dated. In addition, the charter school did not provide evidence that verified these policies and procedures were approved by its Board of Education.

**Citation:**

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

**Required Action:**

For the 2020-2021 school year, the charter school must update its district-level policies and procedures regarding the Educational Stability of Children in Foster Care to include the date on which such policies and procedures were adopted by the Board of Education. The charter school will maintain documentation on file of this approval and adoption by the Board of Education, and upon request, make such documentation available to the Office of Supplemental Educational Programs.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Recommended Action:**

The district 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.

**Finding 6:**

The charter school did not provide evidence regarding the processes and procedures to address with parents and adult students the following military or college recruiter requirements in a timely manner:

- Method(s) of distribution of the Military Opt-Out form to parents and their children
- Process(es) for maintaining a record of parents and students who requested to opt-out
- Verification process/system to show students' information was sent to military or college recruiters when requested.

**Citation:**

ESEA §8528-Armed Forces Recruiter Access to Students and Student Recruiting Information

**Required Action:**

For the 2020-2021 school year, the charter school must establish specific processes and procedures to ensure it meets all military and/or college recruiters' requirements as set forth in ESEA. The charter school must keep on file documentation of such processes and procedures to be implemented to address the military and/or college recruiters' requirements, and upon request, make this documentation available to the Office of Supplemental Educational Programs.

**Title III**

No program findings were identified.

**IDEA Grant**

No program findings were identified.

**IDEA Program**

**Finding 1:**

The charter school did not consistently document in the IEPs of students removed from the general education setting for more than twenty percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment (LRE). Specifically, IEPs did not consistently include:

- the supplementary aids and services considered and an explanation of why the supplementary aids and services were rejected

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

- a comparison of the benefits provided in the general education classroom and the benefits provided in the special education class for those students placed in separate settings, activities to transition the student to a less restrictive environment.

**Citations:**

N.J.A.C. 6A:14-4.2 (a)8(i),(ii) and (iii) , N.J.A.C. 6A:14-2 (a)4

**Required Action:**

The charter school must ensure that when determining the educational placement of a child with a disability, the IEP team considers the general education class first and that all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than twenty percent of the school day. 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. To demonstrate that the charter school has corrected the individual instances of noncompliance, the charter 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 the revised IEPs, along with a random sample of IEPs for students whose annual review meetings were conducted between December 2020 and March 2021, and review the oversight procedures. The names of the students with IEPs that are identified as noncompliant will be provided to the charter school by the special education monitor.

**Finding 2:**

The charter school did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

**Citation:**

N.J.A.C. 6A:14-2.3(k)1(iii)

**Required Action:**

The charter school must ensure that each student, age 14 or above, with an IEP, is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Finding 3:**

The charter school did not consistently conduct multi-disciplinary initial evaluations for students referred for speech-language services by obtaining a written educational impact statement from the classroom teacher.

**Citations:**

N.J.A.C. 6A:14-2.5(b)6 and 3.6(b)

**Required Action:**

The charter school must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a written statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the charter 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 NJDOE will conduct a site visit to interview staff, review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between December 2020 and March 2021, and review the oversight procedures.

**Finding 4:**

The charter school did not consistently provide to students who were eligible for special education and related services written notice of graduation and a summary of academic achievement and functional performance prior to graduating and/or exiting.

**Citation:**

N.J.A.C. 6A:14-4.11(b);4

**Required Action:**

The charter school must ensure students are provided with written notice of graduation and a summary of academic achievement and functional performance prior to graduation that addresses all required components. 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 citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff, review written notice of graduation and the summary of academic achievement and functional performance provided to students at the conclusion of the 2019-2020 school year, and review the oversight procedures.

**Finding 5:**

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



**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

parents of students eligible for speech-language services notice of a meeting for reevaluation planning meetings.

**Citation:**

N.J.A.C. 6A:14-2.3(k)

**Required Action:**

The charter school 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 school must conduct training for child study team members and 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, review meeting documentation for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 6:**

The charter school did not consistently document in the IEPs of students eligible for special education and related services, the relevant factors that were 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:**

The charter school must ensure that consideration of ESY is documented in the IEP. 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 citation listed above. To demonstrate that the charter 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, along with a random sample of IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the school by the special education monitor.

**Finding 7:**

The charter 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.

**Citation:**

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

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The charter 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 charter 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 charter 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 a meeting conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 8:**

The charter 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 measurable goals and objectives for science, social studies, counseling and occupational therapy. Additionally, the charter school did not consistently document student strengths for students eligible for speech-language services.

**Citations:**

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)

**Required Action:**

The charter school must ensure that IEPs for students eligible for special education and services and students eligible for speech-language services contain all required components. In order to demonstrate correction of noncompliance, the charter school must conduct training for child study team members and speech-language specialists who case manage and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the charter school has corrected the individual instances of noncompliance, the charter school must conduct IEP meetings and revise the IEPs that were determined noncompliant. A monitor from the NJDOE will conduct a site visit to interview staff, review the revised IEPs along with a random sample of IEPs developed at meetings conducted between December 2020 and March 2021, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the charter school by the special education monitor.

**Finding 9:**

The charter school did not consistently ensure that all required participants were in attendance at identification, initial eligibility, and reevaluation planning meetings for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**Citations:**

N.J.A.C. 6A:14-2.3(k)1(i-vii); N.J.A.C. 6A:14-2.3(k)1(i-vii)

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Required Action:**

The charter school 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 school must conduct training for child study team members and speech-language specialists who case manage 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 meeting documentation, including sign-in sheets, for meetings conducted between December 2020 and March 2021, and review the oversight procedures.

**Finding 10:**

The charter school did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for speech- language services. Evaluation reports did not consistently include an observation of the student in other than a testing setting and a parent interview.

**Citation:**

N.J.A.C. 6A:14-3.4(f)4(i-vi)

**Required Action:**

The charter school must ensure that all components of the functional assessment are conducted as part of all initial evaluations. In order to demonstrate correction of noncompliance, the charter 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, review initial evaluation reports for students evaluated between December 2020 and March 2021, and review the oversight procedures.

**Finding 11:**

The charter school did not ensure that case management responsibility was assigned to child study team members for students eligible for special education and related services. Case management responsibility were assigned to special education teachers.

**Citations:**

N.J.A.C. 6A:14-3.2 (a)-(c); N.J.A.C 6A:14-3.1(B) and 5.1(a)1, 2, and 3

**Required Action:**

The charter school must ensure that case management responsibilities are assigned to child study team members who are employees of a local education agency. In order to demonstrate correction of noncompliance, the charter school must develop policies and procedures to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct a site visit to interview staff and review child study team staffing and case management responsibilities.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Finding 12:**

The charter school did not consistently fully implement the IEPs for students eligible for special education and related services. Specifically, related services are not consistently provided at the frequency required by the IEP.

**Citations:**

N.J.A.C. 6A:14 -3.9; N.J.A.C. 6A:14-4.1

**Required Action:**

The charter school must ensure that all students eligible for special education and related services are provided the educational program required by the students' IEPs. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and district administrators and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate that the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings for specific students with IEPs that were not fully implemented to determine the compensatory services to be provided and document the decision in the IEP. A monitor from the NJDOE will conduct a site visit to interview staff, review the IEPs from the required annual review meetings, the schedule for the provision of compensatory services, and review the oversight procedures. Names of the students whose IEPs were not fully implemented will be provided to the school by the special education monitor.

**Finding 13:**

The charter school did not consistently provide interventions in general education for students exhibiting academic or behavioral difficulties prior to referring the student for an evaluation of eligibility for special education and related services. Instead, the school places general education students in special education classes as an intervention.

**Citation:**

N.J.A.C. 6A:14-3.3 (b)-(c)

**Required Action:**

The charter school must cease the practice of placing general education students in special education classes as an intervention for students exhibiting academic or behavioral difficulties. In order to demonstrate the correction of noncompliance, the charter school must:

- Review class lists and immediately remove any general education student placed in a special education class;
- Develop a process to ensure interventions are provided in general education for any student exhibiting academic or behavioral difficulties; and
- Conduct training and for administrators, teachers, and child study team members and develop an oversight mechanism to ensure compliance with the citations listed above.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

A monitor from the NJDOE will conduct a site visit to review class lists to ensure only students eligible for special education and related services are enrolled in special education classes, review the process developed to provide interventions in general education along with evidence of staff training, and review oversight procedures.

**Finding 14:**

The charter has exceeded the class size limits for students eligible for special education and related services.

**Citations:**

N.J.A.C. 6A:14-4.6 (m-p); N.J.A.C. 6A:14 -4.7 (c- g)

**Required Action:**

The charter school must ensure that classes for students eligible for special education and related services do not exceed the class size limits. In order to demonstrate correction of noncompliance, the charter school must conduct training for administrators 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 review class lists to ensure compliance and review the oversight procedures.

**Administrative**

**Finding 1:**

The monitors noted that through December 31, 2019 the school had expended little 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 December 31, 2019</b>	<b>Percent Expended</b>
Title I	\$1,106,321	\$187,915	17%
Title III	\$25,045	\$0	0%
IDEA Basic	\$187,130	\$32,532	17%
IDEA Preschool	\$2,528	\$0	0%

Failure to expend additional funds in accordance with the approved grant applications by June 30, 2020 could result in the permanent loss of federal funds.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Citation:**

Uniform Grant Guidance 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:**

Expenditures and salaries related to the grant are not being charged to the grant in the general ledger. Per management, expenditures have been charged to the general fund with the intention to make transfers at year end. Accordingly, monitors could not identify grant related expenditures.

**Citation:**

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

**Required Action:**

In order to accurately account for grant expenditures all related expenditures, salaries and benefits must be charged directly to grant accounts in the general ledger.

**Finding 3:**

The school failed to formally appoint all individuals charged to the federal programs by board resolution.

**Citation:**

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

**Required Action:**

All staff charged to federal grants should be reappointed annually by board resolution.

**Finding 4:**

Equipment purchased with federal funds did not have visible, permanently attached, numbered inventory tags indicating the federal funding source.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.313.

**Required Action:**

The school must place visible, permanently attached, numbered inventory tags with federal funding source on all equipment purchased with federal funds.

**Freedom Prep Charter School  
Collaborative Monitoring Report  
June 2020**

**Finding 5:**

The school did not comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with federal funds must complete a semi-annual certification attesting to their performance of grant related duties. Employees with less than 100 percent of their salary paid with federal funds must complete monthly personal activity reports.

**Citation:**

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

**Required Action:**

The school must ensure that employees submit personal activity reports that have been verified by supervisors, as required.

**Finding 6:**

The school lacked adequate board approved policies and standard operating procedures to ensure compliance with federal and New Jersey regulations.

**Citations:**

Uniform Grant Guidance 2 C.F.R. 200.300 and N.J.A.C. 6A:23A-6.

**Required Action:**

The district must prepare written policies and procedures or revise existing versions as necessary for conformity with state and federal regulations.

**Recommendation 1:**

The school does not have a purchasing manual that details procedures for the procurement of goods and services in accordance with federal regulations and New Jersey Public School Contracts Law.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.302; N.J.A.C. 6A:23A-6.6 Standard operating procedures for business functions; N.J.S.A. 18A:18A(2)(v).

**Recommended Action:**

The school should prepare and adopt a detailed purchasing manual to ensure compliance with current state and federal procurement regulations.

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).