

**State of New Jersey  
Department of Education  
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**North Star Academy Charter School**  
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*New Jersey K to 12 Education*

**Collaborative Monitoring Report  
June 2020**

**District:** North Star Academy Charter School  
**County:** Essex  
**Dates On-Site:** February 25 and 26, 2020  
**Case #:** FM-019-20

**Funding Sources**

Program	Funding Award
Title I, Part A	\$4,276,957
IDEA Basic	1,156,389
Total Funds	<u>\$5,433,346</u>

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**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 purpose and achieving the overall objectives of the funding initiatives.

**Introduction**

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The NJDOE visited the North Star Academy 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 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 and IDEA Basic for the period July 1, 2019 through December 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 were Title I and IDEA Basic from July 1, 2019 through December 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 is using its 2019-2020 Title I funds to implement a schoolwide program for the following activities: teacher salaries for in-class support, extended instructional time, and parent and family engagement.

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**Note:**

While the school did provide a copy of a Title I Schoolwide Plan, the template used was incorrect. The school was given 60 days, from the date of the monitoring visit, to fill out an Annual School Plan for 2019-2020 found in the Annual School Planning System located on NJDOE Homeroom.

**IDEA Projects (Special Education)**

IDEA funds are utilized for salaries and benefits for staff working directly or indirectly with students with disabilities.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

The school did not provide evidence that junior and senior students' names, addresses, and telephone listings were provided to military, college recruiters, and employers, upon request. The school also did not provide evidence of distributing the "opt-out" form to parents and adult students. Local Education Agencies (LEA) are to distribute these documents at the beginning of the school year, so parents or students can make timely and informed decisions.

**Citation:**

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

**Required Action:**

The school must ensure that parents and students, as applicable, are notified of these requirements and given the opportunity to exercise the "opt-out" using the form located on the [Student Records and Rights webpage](https://www.state.nj.us/education/ESSA/records/): <https://www.state.nj.us/education/ESSA/records/>

**Finding 2:**

The school did not provide a policy for the Educational Stability for Children in Foster Care that addresses the following:

- How the LEA will promptly provide, arrange and fund transportation for the duration of time a student is in foster care
- How the LEA will ensure that the processing of tuition reimbursement is conducted in such a way as to avoid any barriers to enrollment
- How the LEA will ensure immediate enrollment upon receipt of a school notification letter from the Department of Children and Families
- How the LEA will ensure immediate records transfers for children in foster care.

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**Citation:**

*ESEA §1112 (c): Local Educational Agency Plans (Assurances)*

**Required Action:**

The district must create a policy for the Educational Stability for Children in Foster care to include all elements listed above. The district must submit copies of a recent board approved district educational stability policy to the NJDOE for review.

**Recommendation 1:**

The Stakeholder/ Schoolwide Committee consists solely of board members. In order to ensure a more enhanced and meaningful engagement in the process of developing and implementing a schoolwide plan for improving student achievement, the school should consider adding parents and community members, who are not affiliated with the school, to this committee. Information about local stakeholder engagement can be found on the Department’s website in the [“Local Stakeholder Engagement Under \*The Every Students Succeeds Act \(ESSA\)\*”](https://www.state.nj.us/education/ESSA/guidance/njdoe/StakeholderGuidance.pdf) document (<https://www.state.nj.us/education/ESSA/guidance/njdoe/StakeholderGuidance.pdf>).

**Citation:**

*ESEA 1114(b)(2): Schoolwide Program Plan*

**Recommendation 2:**

While the school did provide evidence of a Title I meeting and a parent and family engagement policy, the information contained in both is outdated and contains references to No Child Left Behind (NCLB). The school should implement a process to ensure parents receive updated information regarding the ESSA moving forward. Resources and templates can be found on the [Title I, Part A: School/Family/Community Engagement](https://www.nj.gov/education/title1/program/parent/) webpage at: <https://www.nj.gov/education/title1/program/parent/>.

**Citation:**

*ESEA §1116(a)(2): Parent and Family Engagement (Written Policy); ESEA §1116(b): Parent and Family Engagement (School Parent and Family Engagement Policy)*

**IDEA (Special Education)**

**Finding 1:**

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

**Citation:**

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

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**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 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 September and December 2020, and review the oversight procedures.

**Finding 2:**

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

**Citation:**

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

**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 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, including the sign-in sheets, for meetings conducted between September and December 2020, and review the oversight procedures.

**Finding 3:**

The charter did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation or a speech-language evaluation to determine if an evaluation was warranted.

**Citation:**

N.J.A.C. 6A:14-3.3(e), 3.4(j)

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**Required Action:**

The charter must ensure that identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are in attendance. In order to demonstrate correction of noncompliance the charter 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 documentation from identification meetings conducted between September and December 2020, and review the oversight procedures.

**Finding 4:**

The charter did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and related services and students referred for speech-language services.

**Citation:**

N.J.A.C. 6A:14-3.4(f)4(i –vi), (g) 1-4

**Required Action:**

The charter must ensure all components of the functional assessment are conducted as part of all initial evaluations. In order to demonstrate correction of noncompliance the charter must conduct training for child study teams and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. Monitors from the NJDOE will conduct a site visit to interview staff, review initial evaluation reports for students whose eligibility meetings were held between September and December 2020, and review the oversight procedures.

**Finding 5:**

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

**Citation:**

N.J.A.C. 6A:14-2.5(b)6, 3.4(g)3 and d 3.6(b)

**Required Action:**

The charter must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a 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

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noncompliance the charter 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 referred for speech-language services whose eligibility meetings were held between September and December 2020, and review the oversight procedures.

**Finding 6:**

The charter did not consistently document in the IEPs of students removed from the general education setting for more than 20 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 for those students placed in separate settings, activities to transition the student to a less restrictive environment.

**Citation:**

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

**Required Action:**

The charter 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 20 percent of the school day. The charter must also ensure that for students placed in separate settings, the IEP team identifies activities to transition the student to a less restrictive environment and document them in each IEP. 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 whose IEPs 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 additional IEPs developed at meetings conducted between September and December 2020, and review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the charter by the monitor.

**Finding 7:**

The charter did not consistently conduct annual review meetings within required timelines for students eligible for special education and related services.

**Citation:**

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

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**Required Action:**

The charter must ensure that IEP meetings are conducted annually or more often if necessary, to review and revise the IEP. 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 documentation from annual review meetings conducted between September and December 2020, and review the oversight procedures.

**Finding 8:**

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

**Citation:**

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

**Required Action:**

The charter school must ensure reevaluations are conducted within required timelines. 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 documentation of eligibility meetings held as part of the reevaluation process between September and December 2020, and review the oversight procedures.

**Administrative**

**Finding 1:**

As of the date of the monitoring visit February 25, 2020, the school had not drawn down any of their federal fund allocations.

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.305

**Required Action:**

The school must establish and maintain effective internal control over federal awards that ensure compliance with federal statutes and regulations. It is recommended that federal funds drawdowns be made on a monthly basis but never less than quarterly.



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**Finding 2:**

The school does maintain policies and procedures. However, the following required policies were missing:

- A policy establishing the approval process for any remittance of payment for invoice amounts greater than the approved purchase order.
- A policy specific to federal grant awards including a process for drawdown of funds.

**Citation:**

N.J.A.C. 6A:23A-6.10; Uniform Grant Guidance 2 C.F.R. 200.300

**Required Action:**

The policies identified above should be drafted in accordance with federal and state regulation and formally adopted by board resolution.

**Finding 3:**

The school did not comply with all 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, and employees with less than 100 percent of their salary paid with federal funds must complete monthly personal activity reports. The school was preparing semi-annual personal activity reports for both fully funded and split funded staff.

**Citation:**

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

**Required Action:**

The school must ensure that split-funded employees submit personal activity reports on a monthly basis, as required.

**Finding 4:**

The school was not charging all grant related expenditures to the appropriate grant account in the general ledger. Some grant expenditures were being charged to the general fund with the intention of transferring them to a grant related account at a later date. As an example, grant related stipend salaries were being charged to the general fund.

In addition, federally funded staff were not being identified timely and properly charged to the grants. Monitors noted that certain employees were being identified as grant staff during the year and being charged retroactively against the grant. The school was also not consistent in the classification of grant related staff. For example, Title I staff was identified as fully funded on time and activity reporting, however, board minutes indicated they were 83% funded by Title I. This was the result of the school charging July and August salaries to general funds even though 100% of these staff members time was Title I related.

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**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 as they are incurred. Staff must be consistently identified as fully or split funded.

**Finding 5:**

The school failed to use complete general ledger account numbers as required by the Uniform Minimum Chart of Accounts for New Jersey Public Schools.

**Citation:**

The Uniform Minimum Chart of Accounts for New Jersey Public Schools; N.J.A.C. 6A:23A-16.2(f)

**Required Action:**

The school must implement general ledger account numbers using the minimum level of detail for expenditure accounts as required by New Jersey regulation.

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).