

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

Jersey City Global Charter School
255 Congress Street
Jersey City, NJ 07307
Phone: (201) 912-5298



New Jersey K to 12 Education

Collaborative Monitoring Report
January 2021

District: Jersey City Global Charter School
County: Hudson
Dates Monitored: November 17 and 18, 2020
Case #: CM-01-21

Funding Sources

Program	Funding Award
Title I, Part A	\$260,006
IDEA Basic	92,542
IDEA Preschool	1,158
Title II, Part A	11,967
Title III Immigrant	7,321
ESSER	157,623
Total Funds	<hr/> <u>\$530,617</u>

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Background

The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to districts within their local jurisdiction. The provision of these programs and services is based on the requirements as specified in each of the pertinent authorizing statutes (ESSA, IDEA or other federal law(s)).

The laws further require that state education agencies, in this case, the New Jersey Department of Education (NJDOE) to monitor the implementation and execution of federal programs by the sub recipients. The monitors thereby determine whether the funds are being properly used by the district for their intended purposes and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited the Jersey City Global Charter School (school) to monitor the school's use of federal funds. It also monitors related program plans, as 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.

The goal of the monitoring is to determine whether the funds were spent in accordance with the program's requirements, federal and state law and applicable regulations.

The on-site visit included: staff interviews and document and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); Title III Immigrant, Elementary & Secondary School Emergency Relief Fund (ESSER) and IDEA Basic and Preschool for the period July 1, 2020 through October 31, 2020.

The scope of work performed included the review of documents and documentation which included:

- accounting records
- annual audits
- board minutes
- current school policies and procedures
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

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The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEPs)
- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

Expenditures Reviewed

The grants reviewed included Title I, Title II, Title III Immigrant, ESSER and IDEA Basic and Preschool from July 1, 2020 through October 31, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

General Overview of Uses of Federal Funds

Title I Projects

The School serves grades K–8 and operates a Title I schoolwide program. During the 2020-2021 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; and
- 3) parent and family engagement.

Title II-A Projects

Title II-A funds are used for professional development services.

Title III Immigrant Projects

The School serves a diverse population of students speaking Spanish or various Indian languages, including Tamil, Gujarati, Telegu, Marathi. The number of students and families arriving from a different country needing language instruction services and assistance to acclimate to their new community and school environment are growing. Federal funds received under Title III Immigrant will be used to implement a parent academy which focuses on the specific needs of families arriving to the U.S. Topics may include “Know Your Rights” workshops, citizenship classes, and use of technology.

IDEA Grant

The FY 2021 IDEA Basic funds are used to pay contracted service providers for Child Study Teams services and related services.

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Detailed Findings and Recommendations

Title I

Finding 1:

During the beginning of the 2020-2021 school year, the district provided parent and family engagement services solely through a virtual ‘Parent Academy’ program. In the district’s FY 2021 Education and Secondary Education Act (*ESEA*) Consolidated Subgrant Application, \$5,000 in Title I, Part A funds was budgeted for childcare services and \$5,000 for miscellaneous refreshments for in-person parent and family engagement services. As of the dates of the collaborative monitoring visit (11/17/20 and 11/18/20), the entire parent and family engagement program was implemented through a virtual platform. Given the virtual provision of the parent and family engagement program, the school did not provide childcare services and miscellaneous refreshments. Consequently, the \$10,000 in Title I, Part A budgeted costs did not constitute allowable uses of Title I, Part A funds.

Citations:

ESEA §1112 Local Educational Agency Plans; 2 CFR §200.404 and §200.405 Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)

Required Action:

The school must revise the Title I, Part A budget in its FY 2021 *ESEA* Consolidated Subgrant Application, to budget the \$10,000 for allowable parent and family engagement services or other allowable Title I, Part A services.

Recommended Action:

It is recommended that both program and fiscal staff work collaboratively on future, *ESEA* Consolidated Subgrant Applications, especially regarding completion of the Title I, Part A budget section, as well as all other titles’ budget sections. In these joint discussions, both program and fiscal staff must ensure all budgeted costs, per title, are aligned to the district’s identified needs and allowable uses as articulated in each title’s program plan.

Finding 2:

The school budgeted \$90,426 in Title I, Part A funds for the salaries and FICA benefits of two (2) paraprofessionals, as articulated in the FY 2021 *ESEA* Consolidated Subgrant Application.

Based on a virtual interview with district administrators, as well as a review of time and activity reports and Board minutes, it was determined the school used Title I, Part A funds for the salaries of seven (7) paraprofessionals.

Four (4) of the paraprofessionals were employed for the in-class support program, two (2) paraprofessionals for the extended day/year program, and one (1) paraprofessional for the Title I Virtual Summer Academy.

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Consequently, the Title I, Part A budget in the district's FY 2021 *ESEA* Consolidated Subgrant Application did not represent accurately the total number of Title I-funded paraprofessionals or their total salaries and benefits under the 100-100 Instructional FICA Only budget line.

Citations:

ESEA §1112 *Local Educational Agency Plans*; 2 CFR §200.404 and §200.405 *Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)*; 2 CFR §200.430 *Cost Principles: Subpart E (Compensation – personal services)*

Required Action:

The school must revise the Title I, Part A budget in its FY 2021 *ESEA* Consolidated Subgrant Application, to accurately budget Title I, Part A funds for seven (7) paraprofessionals instead of only two (2) paraprofessionals.

Finding 3:

Based on a review of the June 9, 2020 Board minutes, it was determined that staff member M. Barrios was approved to be hired as a paraprofessional in the school's Title I Virtual Summer Academy. The district did not provide documentation to verify that M. Barrios met the highly qualified requirements for paraprofessionals as articulated in the *ESEA*, as amended by *ESSA*.

Citations:

ESEA §1112(c)(6) *Local Educational Agency Plans - Assurances*; 2 CFR §200.404 and §200.405 *Cost Principles: Subpart E (Reasonable Costs and Allocable Costs)*

Required Action:

The school must submit to the Office of Supplemental Educational Programs documentation to certify that M. Barrios met the *ESEA* highly qualified requirements for paraprofessionals and, therefore, was eligible to be funded (salaries and benefits) with Title I, Part A funds.

Finding 4:

In its FY 2021 *ESEA* Consolidated Subgrant Application, the school budgeted \$102,268 in Title I, Part A funds for the salaries and benefits of twenty-six (26) teachers for the school's extended day/year program. Based on a review of the school's submitted documentation (e.g., time and activity reports and Board minutes), it was determined that only twelve (12) staff members were approved to be hired for the school's extended day/year program. The following staff members were listed and approved in the submitted Board minutes as working in the school's extended day/year programs:

- J. Abrams
- E. Estrada
- K. Lewis
- M. Mack
- J. Sommers
- B. Thomas
- K. Turner
- V. Romero
- C. Vickers
- K. Grande
- A. Nasir
- M. Wilborne-Mack

Please Note: Approved Board minutes must clearly delineate the names of all staff members whose salaries and benefits will be funded with Title I, Part A funds for the percentage of time they provide allowable Title I, Part A services. Time and activity documentation must reflect what Title I-funded staff are doing, when and where they are working, and must match the staff member's funded percentage of time providing the Title I-funded services. This documentation is necessary to verify that Title I-funded staff are performing allowable Title I, Part A activities.

Citation:

2 CFR §200.430 *Cost Principles: Subpart E (Compensation – personal services)*

Required Action:

The school must submit to the Office of Supplemental Educational Programs copies of Board minutes that certify the fourteen (14) additional staff members whose salaries and benefits were listed in the district's FY 2021 *ESEA* Application as being funded with Title I, Part A monies. In addition, the school must submit the time and activity reports for each of these 14 staff members. If the school is unable to provide this supporting documentation, the school must amend its FY 2021 *ESEA* Application to show only twelve (12) staff members' salaries and benefits funded with Title I, Part A monies.

Recommended Action:

It is recommended that both program and fiscal staff work collaboratively, to establish a mechanism that ensures all Title I, Part A budgeted salary costs accurately reflect the total number of Title I-funded staff members in all future, *ESEA* Consolidated Subgrant Applications. In addition, it is recommended that the school institute policies and procedures to ensure all Board minutes clearly delineate the names and position titles of all staff members whose salaries and benefits are funded with Title I, Part A monies.

Finding 5:

The school did not upload its Educational Stability for Children in Foster Care transportation policies and procedures to its FY 2021 *ESEA* Consolidated Subgrant Application.

Citation:

ESEA §1112(c)(5)(B) *Assurances –Written Policies and Procedures*

Required Action:

The school must immediately amend its FY 2021 *ESEA* Consolidated Subgrant Application to upload a current, Board approved copy of its written transportation procedures to delineate how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded in a cost-effective manner for the duration of the children's time in foster care [ESEA §1112 (c)(5)(B)].

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Recommendation 1:

Recommended Actions:

It is recommended the school ensure the information contained in the Needs Assessment is more specific and quantifiable in nature. This may be accomplished by providing more exact and specific details regarding each identified need (e.g., grade levels, student groups, root causes of the needs, etc.).

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that school administrators and 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.

Title II-A

The review of Title II-A expenditures yielded no findings.

Title III Immigrant

The review of Title III Immigrant expenditures yielded no findings.

Recommendation 1:

Citations:

ESEA §1115(g): Use of funds

Required Action:

The Title III Immigrant funds have not been expended. Technical assistance was provided to ensure the school expends funds with allowable expenses. The school will ensure:

- List of immigrant students include only students who match the federal definition and are counted in NJSMART;
- The EWEG needs assessment and allocations support program implementation specific to allowable uses under Title III Immigrant;
- Documentation of use of funds clearly states purpose and aligns with allowable uses; and
- Monies are expended and reimbursements are reconciled on a monthly basis, or at minimum quarterly.

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IDEA Program

Finding 1:

The school does not employ child study team members who are employees of the school or contracted through a local education agency. 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 school must ensure that it employs or contracts with child study members in accordance with the citation(s) listed above.

To demonstrate correction of noncompliance, the school must:

- Employ a Learning Disabilities Teaching-Consultant, School Psychologist, and Social Worker by hiring the staff members directly or contracting with a local education agency; and
- Develop an oversight mechanism to ensure compliance with the requirements in the citation(s) listed above.

A monitor from the NJDOE will conduct a site visit to:

- Interview staff;
- Review documentation verifying the hiring or contracting of child study team staff; and
- Review the oversight procedures.

Finding 2:

The school 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, eligibility, reevaluation planning and annual review meetings.

Citations:

N.J.A.C. 6A:14-2.3(k)3,5; 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a).

Required Action:

The school must provide parents notice of a meeting, in writing, early enough to ensure they have an opportunity to attend.

In order to demonstrate correction of noncompliance, the 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(s) listed above.

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A monitor from the NJDOE will conduct a site visit to:

- Interview staff
- Review copies of notices of meetings conducted between April 2021 and June 2021
- Review the oversight procedures.

Finding 3:

The school did not consistently convene meetings with required participants 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), 2(i-x); 3.3(e); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action:

The school must ensure all meetings are conducted with required participants and documentation of participation is maintained in students' records.

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(s) 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 April 2021 and June 2021
- Review the oversight procedures.

Finding 4:

The school did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for special education and related services or speech-language services to determine if an evaluation was warranted.

Citations:

N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b)

Required Action:

The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation.

In order to demonstrate correction of noncompliance, the 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(s) listed above.

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A monitor from the NJDOE will conduct a site visit to:

- Interview staff
- Review documentation from identification meeting conducted between April 2021 and June 2021
- Review the oversight procedures.

Finding 5:

The school did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an 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 school must ensure 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 school must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation(s) 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 between April 2021 and June 2021;
- Review the oversight procedures.

Finding 6:

The school 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 for students referred for speech-language services. Initial evaluation reports did not contain:

- observations in non-testing setting
- parent interview
- teacher interview
- a review of prior interventions documented by the teacher(s) or others who work with the student, and other informal measures

Citations:

N.J.A.C.6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).

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Required Action:

The school must ensure all components of the functional assessment are conducted as part of all initial evaluations. In order to demonstrate correction of noncompliance, the 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(s) listed above. The school is referred to the sample report form for speech-language evaluations which is located on the “[Special Education Legal Protection & Responsibilities](https://www.nj.gov/education/specialed/form/)” webpage (<https://www.nj.gov/education/specialed/form/>).

Monitors from the NJDOE will conduct a site visit to:

- interview staff
- review initial evaluation reports for students evaluated between April 2021 and June 2021
- review the oversight procedures

Finding 7:

The school did not consistently document all required considerations and statements in the Individualized Education Programs (IEPs) of students eligible for speech-language services.

IEPs developed did not consistently include:

- participation in district wide assessments
- approved accommodations and modification on district wide assessments
- student’s status in speech-language performance, including how the student’s disability affects involvement and progress in general education
- other academic and functional needs that result from the student’s disability

Citations:

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

Required Action:

The school must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the 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(s) listed above
- to demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant

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A monitor from the NJDOE will conduct a site visit to:

- interview staff
- review the revised IEPs;
- review a sample of IEPs for students whose annual review meetings were conducted between April 2021 and June 2021 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. For assistance with correction of noncompliance, the school is referred to the state IEP sample forms which are located on the “[Special Education Legal Protection & Responsibilities](https://www.nj.gov/education/specialed/form/)” webpage (<https://www.nj.gov/education/specialed/form/>).

Finding 8:

The school did not consistently ensure that students eligible for special education and related services are provided educational programming, specifically In Class Support, as required by the students Individualized Education Program (IEP).

Citation:

N.J.A.C. 6A:14-4.1(a)

Required Actions:

The school must ensure that all students with disabilities are provided the educational program required by 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(s) listed above
- to demonstrate that the school has corrected the individual instances of noncompliance, the school 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
- review the schedule for the provision of compensatory services
- review the oversight procedures

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Finding 9:

The school 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. Specifically, IEPs did not consistently include:

- supplementary aids and services considered and an explanation of why they are not appropriate
- comparison of the benefits provided in the general education class and the benefits provided in the special education class
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class

Citations:

N.J.A.C. 6A:14-4.2 (a)8(iii) and 3.7(k)

Required Action:

The school must ensure, when determining the educational placement of a child with a disability, the Individualized Education Program (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 school 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 school must:

- conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation(s) 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 the revised IEPs
- review a random sample of IEPs developed at meetings conducted between April 2021 and June 2021
- 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.

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Administrative

Finding 1:

For employees charged to federal grants, the board minutes contained some, but not all of the required information such as funding grant, account number, position, annual/funded salary and percentage charged.

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.

Finding 2:

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

Citation:

Uniform Grant Guidance (UGG) 2 C.F.R. 200.302

Required Action:

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

Finding 3:

As of the date of the monitoring visit November 17, 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.

Finding 4:

The school has charged several expenditures to the incorrect program general ledger accounts. For example, purchases of certain equipment were charged to supplies.

Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

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Required Action:

The school must follow the Uniform Minimum Chart of Accounts when charging expenditures in the general ledger.

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.