

**State of New Jersey
Department of Education
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Camden's Promise School

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New Jersey K to 12 Education

**Collaborative Monitoring Report
June 2021**

School: Camden's Promise Charter School
County: Camden
Dates Monitored: March 23 and 24, 2021
Case #: CM-09-21

Funding Sources

Program	Funding Award
Title I, Part A	\$1,654,024
Title II	166,356
Title III	20,729
Title III Immigrant	2,842
Title IV	140,768
IDEA Basic	581,221
IDEA Preschool	15,819
Total Funds	\$2,581,759

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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 schools 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 school for their intended purposes and achieving the overall objectives of the funding initiatives.

Introduction

The NJDOE visited Camden's Promise 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 I SIA; Title II; Elementary & Secondary School Emergency Relief Fund (ESSER) and IDEA Basic and Preschool for the period July 1, 2020 through February 28, 2021.

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
- 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

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Expenditures Reviewed

The grants reviewed included Title I; Title I SIA; ESSER; Title II; and IDEA Basic and Preschool from July 1, 2020 through February 28, 2021. 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 PK–12 and operates a Title I schoolwide program. During the 2020-2021 school year, the school programmed and budgeted its Title I, Part A allocation for activities in the following areas:

- 1) instructional staff for in-class support programs;
- 2) parent and family engagement; and
- 3) instructional materials and supplies.

Title II-A Projects

The school used Title IIA funds for professional development, primarily in the areas of positive behavioral interventions and supports, math, language arts and remote learning.

Title III Projects

The school uses Title III funds for professional development, salaries, and supplies.

Title III Immigrant Projects

The school uses Title III Immigrant funds for salaries, and supplies.

Title IV-A Projects

The school utilized Title IV-A funds for a diverse range of activities such as early college (College Now), STEAM (Science, Technology, Engineering, Arts, Mathematics) including an aquarium program and robotics, and antibullying and other social emotional learning initiatives.

IDEA Grant

The FY 2021 IDEA Basic funds are used to pay Child Study Team staff, contracted service providers for related services, and child study team supplies, tests and protocols.

The review of IDEA grant yielded no findings.

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Detailed Findings and Recommendations

Title I

Finding 1:

The school did not upload its Educational Stability for Children in Foster Care policies and procedures, to include transportation procedures, to its FY 2021 ESEA Consolidated Subgrant Application. Per ESEA legislation, each school is required to provide to the New Jersey Department of Education (NJDOE) a current, Board approved copy of the written transportation procedures for children in foster care. These transportation policies and procedures must 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.

Citation:

ESEA §1112 (c)(5)(B) Local Educational Agency Plans – Assurances

Required Action(s):

The school must ensure it uploads its Educational Stability for Children in Foster Care policies and procedures, to include a copy of the current, Board approved written transportation procedures for children in foster care, to the school’s FY 2022 ESEA Consolidated Subgrant Application.

Recommended Action(s):

The 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.

Finding 2:

The school did not provide documented evidence to show an established, Board approved school-school level policy in place at the beginning of the FY 2021 school year. Per ESEA legislation, this policy must be in place at the beginning of each school year. In addition, parents and families must be involved in the development of the written school-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.

Citations:

ESEA §1116 (a)(2): Local Educational Agency Policy: Written Policy

ESEA §1116(b)(1): School Parent and Family Engagement Policy

Required Action(s):

The school must ensure it institutes policies and procedures to ensure a school-school level policy is in place at the beginning of the FY 2022 school year.

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Recommended Action(s):

To further enhance knowledge regarding policies and procedures related to parent and family engagement, it is recommended that the 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.

Finding 3:

The school provided documented evidence of a Board approved school-parent compact; however, the compact included outdated information (i.e., references to New Jersey Core Curriculum Content Standards, highly qualified teachers, etc.). Per ESEA legislation, as a component of the school-level parent and family engagement policy, the school must develop, in collaboration with parents, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the New Jersey Student Learning Standards (NJSLS).

Citation:

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

Required Action(s):

At the beginning of the FY 2022 school year, the school must ensure it has in place a Board approved school-parent compact that meets all ESEA legislative requirements. Information related to school-parent compacts may be found 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.

Finding 4:

The school provided evidence that it distributed its parent notification letter to parents of English learners on the school's language instruction program; however, several required ESEA requirements were missing from the letter, such as:

- How the program will meet the specific needs of the child in attaining English and meeting the New Jersey Student Learning Standards (NJSLS)
- The language instruction program's exit requirements
- The expected rate of transition into a classroom not tailored for English learners

Per ESSA legislation, schools using Title I or Title III funds to provide a language instruction educational program as determined under Title III shall, not later than thirty (30) days after the beginning of the school year, inform parents and families of an English learner identified for participation or participating in such program of specific requirements.

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Citation:

ESEA §1112(e)(3): Parents Right to Know – Language Instruction

Required Action(s):

The school must revise its Parents Right-to-Know Letter for Language Instruction to include the above listed information and re-distribute this letter to all parents and families of English learners. The school must submit documented evidence of the revised Parents Right-to-Know letter for Language Instruction with submission of its Corrective Action Plan (CAP).

Finding 5:

The school did not provide documented evidence of its notification to parents and adult students (18 of age or older) concerning information disclosed to military recruiters, postsecondary institutions, or prospective employers, when requested. Per ESEA legislation, parents must be notified that schools routinely disclose names, addresses and telephone numbers to military recruiters, postsecondary institutions, or prospective employers, subject to a parent's request not to disclose such information without prior written consent. The notification must advise parents of how to opt-out of the public, nonconsensual disclosure, of this information and the method and timeline within which to do so.

Citation(s):

ESEA §8528(a)(2): Armed Forces Recruiter Access to Students and Student Recruiting Information – Consent

Required Action(s):

The school must immediately distribute the required notification regarding the disclosure of students' names, addresses, and telephone numbers, upon request, to military recruiters, postsecondary institutions, or prospective employers. The notification must include information on how parents may opt-out of this public, nonconsensual disclosure of information, as well as the method and timeline within which to do so. The school must maintain on file a record of parents and students who request to "opt-out" from the nonconsensual disclosure of information. Documentation to verify the distribution of this letter must be submitted with the school's CAP.

Finding 6:

The school did not provide documented evidence that the development of its Annual School Plan (ASP) involved the participation of parents and families, outside community representatives, and one or more secondary students as stakeholders on the ASP planning team. Per ESEA legislation, all relevant stakeholders, including parents and families, outside community members, and secondary students, must actively participate in the development, implementation and evaluation of the school's ASP.

Citation

ESEA §1114(b)(2) Schoolwide Program Plan

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Required Action(s):

As the school continues to implement and monitor its Annual School Plan (ASP) throughout the remainder of the FY 2021 ESEA project period, parents and families, outside community members, and one or more secondary students must be included as active participants in the ASP team meetings. The school must submit evidence with its CAP of the active participation of parents and families, outside community members, and one or more secondary students on the ASP planning team.

Recommended Actions:

It is recommended that the school institute policies and procedures to ensure the active and ongoing involvement of parents and families, outside community representatives, and one or more secondary students in the development, implementation, and evaluation of the school's ASP. These groups bring a perspective to the ASP process that is critical to its ongoing success and, ultimately, improved academic achievement for all students. In addition, stakeholder engagement in the ASP process should happen throughout the entire school year, as much as possible, rather than occur in a one- or two-month timeframe. For the 2021-2022 school year, the school must ensure the active and ongoing participation of these representative stakeholder groups in the school's ASP process and institute opportunities for ongoing and regular stakeholder engagement throughout the entire school year.

Additional Recommended Action(s):

The NJDOE recognizes and acknowledges that the COVID-19 pandemic presented the school with many unforeseen challenges during the 2019-2020 school year. Inevitably, these circumstances impacted the school's Title I, Part A program, including the comprehensive needs assessment (CNA) process, as well as the development of the Annual School Plan (ASP). The following recommendations are presented to assist the school in continuing to address and meet these challenges by further strengthening and enhancing its Title I, Part A programs and services.

Comprehensive Needs Assessment:

It is recommended the school include more specific information regarding grade levels, target populations, specific school performance targets, prior year outcomes, and the identification of data sources in the comprehensive needs assessment conducted for the school's ESEA Application, as well as that for the Annual School Plan (ASP). In this way, all comprehensive needs assessment information is in alignment, and shows a clearer connection to data driven decision-making and the importance of stakeholder engagement.

Title II

The review of Title II grant yielded no findings.

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Title III

The review of Title III grant yielded no findings.

Title III Immigrant

The review of Title III Immigrant yielded no findings.

Title IV

The review of Title IV grant yielded no findings.

IDEA Program

Finding 1:

The school did not consistently convene meetings with required participants for students referred and/or eligible for special education and related 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 Actions:

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

To demonstrate correction of noncompliance, the character 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 meeting documentation, including the sign in sheets, for meetings conducted between June 2021 and November 2021
- review the oversight procedures

Finding 2:

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)

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Required Actions:

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.

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 June 2021 and November 2021
- review the oversight procedures

Finding 3:

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 and teacher interview.

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)

Required Actions:

The school must ensure all components of the functional assessment are conducted as part of all initial evaluations. 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 citations listed above.

Monitors from the NJDOE will conduct a site visit to:

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

Finding 4:

The school did not consistently ensure that the Individualized Education Programs (IEPs) of students eligible for special education accurately document the program provided. Specifically, IEPs do not accurately reflect the program provided to students placed in the in-class supplemental program.

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Citation:

N.J.A.C. 6A:14-4.6(a)

Required Actions:

The school must ensure that the IEPs of students with disabilities accurately reflect the special education related services provided. To demonstrate the correction of noncompliance the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

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

- interview staff
- review a random sample of IEPs developed at meetings conducted between June 2021 and November 2021
- review the oversight procedures

Finding 5:

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 and a comparison of the benefits provided in the general education class and the benefits provided in the special education 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.

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:

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- interview staff
- review the revised IEPs
- review a random sample of IEPs developed at meetings conducted between June 2021 and November 2021
- review the oversight procedures

The names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor.

Finding 6:

The 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 school must ensure that each student with an IEP age 14 or above 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 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 June 2021 and November 2021
- review the oversight procedures

Finding 7:

The school did not consistently document in the IEP all required age 14 transition components. Specifically, IEPs did not consistently include:

- courses of study
- identification of the staff member(s) responsible to serve as the liaison to post-secondary resources and make referrals to the resources as appropriate
- statement of interagency linkages and responsibilities

Citations:

N.J.A.C. 6A:14-3.7(e)11(i)13

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Required Action:

The school must ensure the IEP contains the required considerations and statements. 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 June 2021 and November 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.

Administrative

Finding 1:

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

Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools.

Required Action:

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

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.

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Finding 3:

On several occasions, the school did not obtain multiple quotes for purchases as required by New Jersey Public School Contracts Law (PSCL) and school policy.

Citation:

N.J.S.A. 18A:18A-37 Award of purchases, contracts or agreements.

Required Action:

The school must comply with current N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

Finding 4:

The amounts appropriated for several federal grants in the school's accounting records could not always be reconciled with corresponding amounts awarded in the Electronic Web Enabled Grant system (EWEG).

Citation:

Uniform Grant Guidance 2 C.F.R. 200.300

Required Action:

The school must implement a process to ensure that amounts awarded through a grant are recorded appropriately in the financial records.

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 Actions:

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

Finding 6:

The school is charging Title III and Title III Immigrant expenditures to the same program code (241) in the general ledger. Each of these programs should be assigned a separate program code in the school's general ledger.

Citation:

Uniform Minimum Chart of Accounts for New Jersey Public Schools

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Required Actions:

The school should assign separate program codes to Title III and Title III Immigrant. The codes should be in the 240-249 series.

Finding 7:

The school could document that they followed required procedures to increase purchase orders as required by N.J.A.C. 6A:23A-6.10 "Approval of amounts paid in excess of approved purchase orders".

Citation:

N.J.A.C. 6A:23A-6.10

Required Actions:

Increases to purchase orders should be done in compliance with current regulations. Specifically, copies of revised purchase orders should be retained.

Finding 8:

The school did not provide detailed schedules, by individual, of salaries that agreed with the expenditures charged to the programs in the general ledger.

Citation:

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

Required Action:

The school must maintain records that account for the salary amounts charged to the federal grants, by individual.

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.