

State of New Jersey  
Department of Education  
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**Environment Community Opportunity Charter School**

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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
July 2021

**District:** Environment Community Opportunity Charter School  
**County:** Camden  
**Dates Monitored:** May 26 and 27, 2021  
**Case #:** CM-16-21

**Funding Sources**

Program	Funding Award
Title I, Part A	\$288,410
Title IV	9,692
ESSER	184,872
IDEA Basic	67,986
IDEA Preschool	3,072
Total Fund	<hr/> <u>\$554,032</u>

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**Background**

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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) 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**

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The NJDOE visited the Environment Community Opportunity 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 IV, Elementary & Secondary School Emergency Relief Fund (ESSER) and IDEA Basic and Preschool for the period July 1, 2020 through April 30, 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

The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify
- implementation of Individualized Education Programs (IEPs)

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- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

**Expenditures Reviewed**

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The grants reviewed included Title I, Title I SIA; ESSER, Title II, and IDEA Basic and Preschool from July 1, 2020 through April 30, 2021. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**General Overview of Uses of Federal Funds**

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**Title I Projects**

The school is using its FY 2020-2021 Title I, Part A funds to implement a targeted assistance program. Primarily, the school provides supplemental instructional opportunities through extended learning opportunities.

**Title IV Projects**

FY 2021 Title IVA funds are being used primarily to support a whole school behavior and academic success positive behavioral support initiative through Expeditionary Learning.

**IDEA Grant**

The FY 2021 IDEA Basic funds are used to pay for consultants conducting child study team, occupational, and speech therapy evaluations for student in grades K-8. Funds are also used for salaries of a speech therapist and a child study team supervisor. The FY 2021 IDEA Preschool funds are used for speech evaluations of kindergarten students and testing supplies.

There were no findings with the IDEA Grant.

**Detailed Findings and Recommendations**

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**Title I**

The review of Title I grant yielded no findings.

**Title IV**

The review of Title IV grant yielded no findings.

**IDEA Program**

**Finding 1:**

The charter school did not consistently conduct multidisciplinary initial evaluations for students

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referred for speech-language services by obtaining a written educational impact statement from the classroom teacher.

**Citation:**

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

**Required Actions:**

The charter 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 charter 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 July 2021 and December 2021
- review the oversight procedures

**Finding 2:**

The school does not employ child study team members who are employees of a local education agency. The Learning Disabilities Teacher-Consultant (LDT-C) and School Social Worker services are provided through contracts with NJDOE approved clinics and agencies.

**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 all child study team members are employees of a district board of education. The school must secure the services of an LDT-C, School Psychologist, and Social Worker through a contract or joint agreement with a local school district, educational services commission, jointure commission or special services school district to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct a site visit to interview staff and review employment documentation for the child study team members.

**Finding 3:**

The charter school does not have a special education parental advisory group to provide input to the school on issues concerning students with disabilities.

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**Citation:**

N.J.A.C. 6A:14-1.2 (h).

**Required Action:**

The school must ensure a special education parent advisory group is available in the school. To demonstrate correction of the noncompliance the charter school must organize and establish a parent advisory group.

A monitor from NJDOE will conduct a site visit to interview staff, review the list of members of the special education parent advisory group, and agendas for meetings held subsequent to the monitoring visit.

**Administrative**

**Finding 1:**

The school failed to formally appoint individuals receiving stipend from the Title I grant by board resolution.

**Citation:**

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

**Required Action:**

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

**Finding 2:**

On several occasions, the school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). District policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citations:**

Uniform Grant Guidance 2 C.F.R. 200.302; N.J.S.A. 18A:18A(2)(v) Public School Contracts Law.

**Required Action:**

Purchase orders must be issued to all vendors prior to goods or services being provided.

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).