

State of New Jersey  
Department of Education  
PO Box 500  
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**Maria L. Varisco-Rogers Charter School**

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New Jersey K to 12 Education

Collaborative Monitoring Report  
June 2023

**Charter School:** Maria L. Varisco-Rogers Charter School  
**County:** Essex  
**Dates Monitored:** April 18, 19, 20 and 21, 2023  
**Case Number:** CM-04-23

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	609,218
Title I SIA	0
Title II, Part A	41,451
Title III	100,730
Title III Immigrant	2,353
Title IV, Part A	0
IDEA Part B, Basic and Preschool	139,625
CRRSA ESSER II (includes all subgrants)	1,334,193
ARP ESSER (includes all subgrants)	2,917,748
Perkins V	0
<b>Total Funds</b>	<b>5,145,318</b>

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

## **Background**

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The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA) and other Federal education laws require local education agencies (LEAs - school districts and charter schools) to provide programs and services to schools within their local jurisdiction. The provision of these programs and services is based on the pertinent authorizing statutes specified in each of the Federal education laws.

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 subrecipients. The monitors thereby determine whether the funds are being properly used by the charter school for their intended purposes and achieving the overall objectives of the funding initiatives.

## **Introduction**

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The NJDOE visited the Maria L. Varisco-Rogers Charter School (MLVR or charter school) virtually, except where noted, to monitor the charter school's use of Federal funds. The NJDOE also examined related program plans, as applicable, to determine whether the charter 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 requirements of each program, Federal and state laws, and applicable regulations. The monitoring of MLVR included staff interviews, as well as the review of documents and records related to the requirements of these programs:

- Title I, Part A (Title I);
- Title II, Part A (Title II-A);
- Title III, Part A (Title III);
- Title IV, Part A (Title IV-A);
- IDEA Part B - Basic and Preschool;
- Coronavirus Response and Relief Supplemental Appropriations ESSER Fund (CRRSA ESSER II) and applicable subgrants; and
- American Rescue Plan (ARP) ESSER and applicable subgrants.

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

- accounting records
- annual audits
- board of trustees (board) meeting minutes

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

The scope of work performed also included interviews with:

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

In addition, a sampling of computing devices and equipment purchased with Federal funds was selected and physically examined without exception.

### **Expenditures Reviewed**

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The grants and programs reviewed included Title I, Title II-A; Title III and IDEA Basic and Preschool from July 1, 2022 through March 27, 2023. In addition, CRRSA ESSER II and all applicable subgrants were reviewed from commencement of the related project period through March 27, 2023. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

### **General Overview of Uses of Federal Funds**

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#### **Title I, Part A Projects**

The purpose of the Title I program is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The LEA is a K—8 charter school and operates a schoolwide program in its Title I-funded school. During the 2022-2023 school year, the LEA is utilizing its Title I allocation of funds in the following areas:

1. contracted Instructional Paraprofessionals;
2. instructional materials and supplies;
3. extended day/year programs;
4. professional development;
5. parent and family engagement;
6. social-emotional learning;

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

7. increased learning time, and
8. Science, Technology, Engineering and Mathematics (STEM)/STEAM<sup>1</sup> activities.

### **Title II-A Projects**

The purpose of Title II-A is to:

1. increase student achievement consistent with the challenging State academic standards;
2. improve the quality and effectiveness of teachers, principals and other school leaders;
3. increase the number of teachers, principals and other school leaders who are effective in improving student academic achievement in schools; and
4. provide low-income and minority students greater access to effective teachers, principals and other school leaders.

MLVR has identified several needs within their charter school including, increasing staff professional development in understanding the New Jersey Learning Standards and in improving their English Language Arts (ELA), Mathematics, Science, and Social Studies hybrid instruction. In addition, MLVR transferred \$36,000.00 of their original Title II-A allocation of \$77,451.00 to Title III.

### **Title III Projects**

The purpose of Title III is to:

1. help ensure that English learners, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English;
2. assist all English learners, including immigrant children and youth, to achieve at high levels in academic subjects so that all English learners can meet the same challenging, State academic standards that all children are expected to meet;
3. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching English learners, including immigrant children and youth;
4. assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare English learners, including immigrant children and youth, to enter all English instructional settings; and

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<sup>1</sup> The acronym STEAM consists of STEM, plus an "A" for "Arts."

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

5. promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of English learners.

MLVR uses its Title III funds for professional development in Sheltered Instruction Observation Protocol, a Teacher's salary and workshops for parents and family members of English learners.

### **Title III Immigrant Projects**

The purpose of Title III Immigrant funds is to provide enhanced instructional opportunities for immigrant students and their families. MLVR uses its Title III Immigrant funds for curricular materials for ELA/Writing, Mathematics, Science, Social Studies, and STEAM that provide native language scaffolds for port of entry students.

### **Title IV-A Projects**

MLVR transferred all of their Title IV-A funds to Title III programs.

### **IDEA**

The purpose of the IDEA grant is to provide federal entitlement funds to assist with the excess costs of providing special education and related services to students with disabilities. The FY 2023 IDEA Basic funds are being expended for a Special Education Teacher's salary and benefits.

### **CRRSA ESSER II**

The purpose of CRRSA ESSER II funding is to provide money to LEAs to assist in: safely reopening schools; measuring and effectively addressing significant learning loss; and testing, repairing, and upgrading projects to improve air quality in buildings.

MLVR uses its CRRSA ESSER II funds to pay for, among other things: the salaries and employee benefits of two enrichment Teachers in Mathematics and ELA, as well as for an afterschool program; compensation for the services of Paraprofessionals through a third party provider; protective student desk barriers; speech language services and evaluations for two students; educational technology such as Chromebooks and software licenses for students and personal protective equipment.

In addition, CRRSA Learning Acceleration (CLA) funds are being used for summer learning academies. CLA funds are also budgeted to pay Teachers to work afterschool with students in order to provide enrichment in Mathematics and Language Arts Literacy, address student learning loss and run the STEM and Performing Arts clubs.

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

CRRSA Mental Health funds are budgeted primarily for stipends for two (2) school counselors and three (3) administrators to implement Family/Group Support Program events, as well as for five (5) Teachers to help the social workers during the provision of these student, parent and events.

## **ARP ESSER II**

The purpose of ARP ESSER funding is to assist LEAs in preparing for and responding to the impact of COVID-19 on educators, students, and families. Additional uses of funds include, but are not limited to:

1. hiring new staff and avoiding layoffs; and
2. addressing learning loss through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs.

MLVR budgeted ARP ESSER funds for, among other things:

1. multiyear salaries and benefits of four additional enrichment Teachers to assist students with learning loss in ELA and Mathematics, a Social Worker to provide mental health services and a Parent Liaison to assist with parent needs;
2. leasing of additional Chromebooks for students; and
3. educational software for afterschool programs to provide enrichment to students.

ARP ESSER subgrant funds are budgeted for uses including, but not limited to:

1. stipends for a Learning Coach and professional development/training for staff;
2. educational field trips, speakers for presentations to students, instructional supplies, school cleaning supplies and services;
3. instructional supplies, textbooks/workbooks and consumable items; and
4. service providers to meet with parents after hours throughout the school year regarding mental health and consultants to students with workshops related to mental health as well.

## **Detailed Findings and Recommendations**

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The Detailed Findings and Recommendations are disaggregated into the following sections:

1. Multiple Grants Section – findings necessitating the reversal of charges for multiple grants due to the lack of adequate supporting documentation.
2. Grant Specific Programmatic and Fiscal Section – findings directly attributable to the Federal awards covered during the monitoring. The programmatic findings precede the fiscal findings unless otherwise denoted by an asterisk (\*).

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

3. Administrative Section – crosscutting administrative findings may be found in this section.

### **Multiple Grants Section**

There are no findings which warrant mention in this section.

### **Grant Specific Programmatic and Fiscal Section**

#### **Title I, Part A**

##### **Finding 1:**

The charter school did not provide evidence of a board approved charter school/school-level parent and family engagement policy or that the policy was widely distributed to parents and families. In addition, the charter school did not provide evidence to show how it actively engaged parents and families in the development of the charter school/school-level parent and family engagement policy. Pursuant to ESEA legislation, parents and families must be involved in the development of the written charter school/school-level parent and family engagement policy, as well as be informed of the ways in which they can further participate in the academic performance and achievement of their children.

##### **Citation(s):**

ESEA §11116 (a)(1) and (b)(1) Parent and Family Engagement: Local Educational Agency Policy and School Parent and Family Engagement Policy

##### **Required Action(s):**

The charter school must ensure that it has a written charter school/school-level parent and family engagement policy that is board approved, annually. The charter school/school-level parent and family engagement policy must be developed and reviewed with the active engagement of parents and families, as well as be widely distributed to parents and families on an annual basis. In this way, parents and families are afforded opportunities to become effective partners in the charter school's ongoing parent involvement process. As part of the submission of its corrective action plan (CAP), the charter school must submit a copy of the board approved charter school/school-level parent and family engagement policy. In addition, the charter school must submit copies of the processes and/or procedures in place to ensure compliance with this ESEA requirement.

##### **Finding 2:**

The charter school did provide evidence that it convened an annual, Title I meeting for parents and families of participating children; however, the meeting did not take place until March 23, 2023. Pursuant to ESEA legislation, a Title I-funded school must convene an annual

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

meeting at the beginning of the school year, to inform parents and families of the charter school's Title I program(s), the Title I legislative requirements, and the ways in which parents and families can be engaged actively in helping their children succeed academically.

**Citation(s):**

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

**Required Action(s):**

The charter school must ensure that it holds an annual, Title I meeting at the beginning of each school year (no later than the first week in October or earlier). To document this annual meeting, the charter school must maintain the following information on file:

1. invitational letter/flyer;
2. meeting agenda;
3. meeting minutes; and
4. sign-in sheets or a list of the names of staff and parents who attended the meeting.

Each piece of documentation must include the exact date on which the annual, Title I meeting was held. As part of the submission of its CAP, the charter school must submit evidence of processes and/or procedures in place to ensure the required annual, Title I meeting takes place at the beginning of the 2023-2024 school year.

**Finding 3:**

In reviewing the Annual School Plan (ASP), the following items were noted:

1. The stakeholder team did not include any community members, even though the charter school certified that all stakeholder engagement group requirements were met;
2. The charter school held seven stakeholder team meetings during the year, yet parents were only present at one meeting;
3. SMART Goal number three (3) was not measurable. It reads “Increase/show growth in Grades K—8 Reading levels during the 2022-2023 school year for English Language Learners.” As written, the goal does not include a quantifiable metric to be reached for student growth in reading levels for grades K—8 (e.g., percent, percentile, score); and
4. The budget totals do not align to the school-level allocation as listed on the Eligibility Step 4 subtab in the ESEA Consolidated Subgrant Application.

**Citation(s):**

ESEA §1114(b) Schoolwide Programs – Components of a Schoolwide Program



Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Required Action(s):**

As part of the submission of its CAP, the LEA must submit evidence of processes and/or procedures in place to ensure that for the 2023-2024 school year:

1. The stakeholder team includes all required, representative stakeholder members, including at least one parent (more than one parent is preferable) and outside community member(s), and that an effort is made to ensure all required stakeholders are present at all meetings;
2. All SMART goals are specific, measurable, attainable, relevant, and timebound; and
3. The budget totals align to the school-level allocation as listed on the Eligibility Step 4 subtab in the ESEA Consolidated Subgrant Application.

**Required Action(s):**

To further enhance knowledge regarding the completion of the ASP, it is recommended the LEA's administrators and staff review the ASP Resources page in NJ Homeroom.

**Finding 4:**

The charter school did not provide documented evidence that it conducted a comprehensive needs assessment (CNA) to include the active participation of all representative stakeholder groups (e.g., administrators, instructional staff, non-instructional staff, support personnel, parents, other community members). The CNA did not identify target populations, specific causes of needs based on data analysis, specific school performance targets, or prior year outcomes. Rather, the CNA seemed to repeat many of the same elements that had appeared in the CNAs in the charter school's ESEA Applications for the last several years, with no direct connection to data analysis. Since the CNA is an ongoing process, not a one-time event, the charter school must institute processes and/or procedures to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families.

**Citation(s):**

ESEA §1112(c)(6) Local Educational Agency Plans - Assurances

**Required Action(s):**

Since the CNA is an ongoing process, the charter school must institute processes and/or procedures to ensure its annual CNA includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families. As part of the submission of its CAP, the charter school must submit evidence of established processes and/or procedures to ensure:

- The CNA includes a thorough analysis of both quantitative and qualitative data to identify specific needs for students, staff and/or parents and families; and

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

- The CNA process involves all relevant stakeholders including administrators, instructional staff, non-instructional staff, support personnel, parents, families and other community members.

**Recommended Action(s):**

It is important to note that the CNA serves as the basis for which all budgeted costs are determined to be necessary, reasonable, and allocable to the Title I grant program (as well as to all other ESEA title programs). Consequently, it is recommended the LEA institute the following steps for the development of a more robust annual CNA that clearly articulates the identified needs not only for the FY 2024 ESEA project period, but also for all subsequent ESEA project periods:

- assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA;
- include more specific and quantifiable details for each identified need. This may be accomplished by providing more exact and specific information regarding each identified need (e.g., target populations, grade levels, performance targets, academic and non-academic outcomes, root causes of the needs, evaluation of prior year outcomes, etc.);
- ensure the active engagement of parents and families, as well as other community members in the development, implementation, and ongoing monitoring of the CNA; and
- incorporate a formal evaluation process as part of the CNA to strengthen the progress monitoring elements (evaluation) required in ESEA.

**Title II-A**

The review of the charter school’s 2022-2023 Title II-A programs yielded no findings.

**Programmatic Recommendation(s):**

MLVR’s needs assessment identifies several of the charter school’s needs, including the need for teachers to obtain professional development in various subject areas. However, the professional development plan and professional development expenditures do not reflect that their Title II-A funds are being used to meet the identified needs. The needs assessment identifies that teachers require further professional development to “master the NJSLS for ELA and Mathematics”, to “master the WIDA English Language”, for English Language Arts instruction, mathematics instruction, STEAM curriculum instruction, and for diversity, inclusion and equity in curriculum. The evidence provided reflects that Title II funding has only been used to address the “English Language Arts instruction” professional development need and to renew organization membership fees. The evidence does not reflect that the Title II funds are being used to fully address the learning needs of teaching staff and/or administrative staff within the charter school.

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Citation(s):**

ESEA §2103(b)(3)(E) and (F) Local Uses of Funds: Types of Activities

**Recommended Action(s):**

It is recommended that MLVR utilize their Title II-A funds to better align their professional development plan with their identified needs assessment. It is also recommended is that MLVR review the allowable uses of funds for [Title II, Part A](#). For additional assistance, please contact the Office of Supplemental Educational programs at [titleiia@doe.nj.gov](mailto:titleiia@doe.nj.gov).

**Title IV-A Projects**

MLVR transferred their Title IV-A funds to its Title III programs.

**IDEA Program**

**Finding 1:**

The charter school does not employ child study team members who are employees of a local education agency. School psychologist and Learning Disabilities Teacher-Consultant services are provided by contracted independent consultants.

**Citation(s):**

N.J.A.C. 6A:14-3.1(b) General requirements and 5.1(a)1, 2 and 3 General requirements

**Required Action(s):**

The charter 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 charter school must employ a Learning Disabilities Teaching-Consultant and School Psychologist through hiring the staff members directly or contracting with a local education agency. The charter school must 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 documentation verifying the hiring of child study team staff
- review the oversight procedures

**Finding 2:**

The charter school does not consistently provide parents of students referred and/or eligible for special education and related services and students referred and/or eligible for

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

speech-language services notice of a meeting for identification, eligibility, reevaluation planning and annual review meetings.

**Citation(s):**

N.J.A.C. 6A:14-2.3(k) Parental consent, notice, participation and meetings

**Required Action(s):**

The charter school must provide parents with notice of a meeting in writing early enough to ensure they have an opportunity to attend. 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 copies of notices of meetings conducted between November 2023 and February 2024
- review the oversight procedures

**Finding 3:**

The charter school does not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for students referred for special education and related services or for students referred for speech-language services.

**Citation(s):**

N.J.A.C. 6A:14-2.5(b)6 Protection in evaluation procedures; 3.3(e) Location, referral and identification and 3.6(b) Determination of eligibility for speech-language services

**Required Action(s):**

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

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

- interview staff
- review documentation from identification meetings conducted between November 2023 and February 2024
- review the oversight procedures

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Finding 4:**

The charter school does not consistently convene identification, eligibility, IEP, and reevaluation 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.

**Citation(s):**

N.J.A.C. 6A:14-2.3 Parental consent, notice, participation and meetings

**Required Action(s):**

The charter 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 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, including the sign in sheets, for meetings conducted between November 2023 and February 2024
- review the oversight procedures

**Finding 5:**

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

The 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

**Citation(s):**

N.J.A.C. 6A:14-3.7(e)1-17 and (f) Individualized Education Program

**Required Action(s):**

The charter school must ensure each IEP contains the required considerations and statements. To demonstrate correction of noncompliance, the charter school must conduct training for speech-language specialists and develop an oversight mechanism to

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

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 whose IEPs were identified as noncompliant. Names of the students whose IEPs were identified as noncompliant will be provided to the charter school by the special education monitor.

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 November 2023 and February 2024
- review the oversight procedures

**Finding 6:**

The charter school does not consistently conduct reevaluations within three (3) years of the previous classification date for students eligible for special education and related services.

**Citation(s):**

N.J.A.C. 6A:14-3.8(a) Reevaluation

**Required Action(s):**

The charter school must ensure that reevaluations are conducted within the required timelines. 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 documentation of eligibility meetings held as part of the reevaluation process between November 2023 and February 2024
- review the oversight procedures

**Finding 7:**

The charter school does not consistently follow appropriate procedures to evaluate students referred for a speech-language evaluation. Speech-language specialists conducted screenings of individual students to determine if an evaluation was warranted after referrals were received but prior to conducting the required identification meeting and obtaining parental consent.

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Citation(s):**

N.J.A.C. 6A:14-2.3(a) Parental consent, notice, participation and meeting, 3.3(e)5 Location, referral and identification and 3.4(a-h) Evaluation

**Required Action(s):**

The charter school must discontinue the practice of screening individual students prior to initiating the evaluation process. 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 citations listed above.

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

- interview staff
- review documents of students referred for speech-language services between November 2023 and February 2024
- review the oversight procedures

**Administrative Section**

**Finding 1:**

The charter school did not have formal written procedures which address Uniform Grant Guidance requirements; examples include, but are not necessarily limited to:

- determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award; and
- the mandatory disclosure of all violations of Federal criminal law involving fraud (pertinent information relating to fraud follows), bribery, or gratuity violations potentially affecting the Federal award.

Pursuant to ESEA legislation, each recipient of a grant or subgrant under ESEA must display, in a public place, the hotline contact information of the Office of Inspector General of the Department of Education (USDEOIG) so that any individual who observes, detects, or suspects improper use of taxpayer funds can easily report such improper use.

Federal guidance relating to the prevention of fraud is accessible from [USDEOIG Brochures](#); scroll past multiple tables to the Brochures, Flyers & Posters (Download Free) section. Use this link, [For K-12: Preventing Fraud and Corruption in Federal Education \(2021\)](#), to access a video training presentation.

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

In addition, the charter school's policy pertaining to the submission of reimbursement requests refers to the Excluded Parties List System in lieu of the current System for Award Management (SAM).

**Citation(s):**

ESEA §9203 Preventing Improper Use of Taxpayer Funds; Uniform Grant Guidance, 2 C.F.R. §§200.302(b)(6)-(7) Financial management and 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles; §200.113 Mandatory disclosures; and 2 C.F.R. §§200.317 – 327 Procurement Standards

**Required Action(s):**

The charter school must develop, revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations and references to current legislation, where appropriate. The charter school may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.

**Finding 2:**

The board meeting minutes provided for examination lacked mention that the charter school agreed to:

1. submit applications and/or amendment applications for certain grants/subgrants, including the dollar amount of federal award; and
2. accept the funds upon subsequent approval of the applications.

In the case of ESEA titled programs, CRRSA ESSER II and ARP ESSER grants/subgrants, the charter school's board meeting minutes mentioning the submission of the corresponding Consolidated Grant Applications did not list the dollar amount of all grants/subgrants separately.

**Citation(s):**

All Consolidated Grant Applications; refer to the Submit tab (Board Authorization) in the Electronic Web-Enabled Grant (EWEG) system

**Required Action(s):**

While completing each Consolidated Grant Applications in EWEG, the charter school must enter the actual or anticipated date of a board resolution, approving the submission of the grant application and acceptance of grant funds, following subsequent approval. The board resolution must be kept on file for audit or monitoring purposes.



Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Finding 3:**

A review of the charter school’s submitted documentation disclosed no indication of board approvals for the funding of:

- staff salaries, in whole or in part, by CRRSA ESSER II; and
- wages incurred and charged to Title I and the CRRSA ESSER Learning Acceleration subgrant for staff members who worked afterschool with students.

LEAs must adopt resolutions evidencing the board’s authorization of staff to perform allowable grant funded activities. With respect to salaried employees, the board minutes must clearly delineate: the account number; funding source; employee name; position title; annual salary, funded salary and salary funding percentages. Subsequent changes in the employee’s funding percentage need to be approved by the board as well.

In regard to staff performing activities outside of normal work duties, the board minutes must include, at a minimum: the account number; funding source; employee name; position title; activity; hourly rate and a “not-to-exceed” amount.

Pursuant to the Uniform Grant Guidance, the total charge for an employee’s compensation must, among other things, follow an appointment made in accordance with LEA’s laws and/or rules or written policies and meets the requirements of Federal statute, where applicable. In accordance with State statutes, “no teaching staff member shall be appointed, except by a recorded roll call majority vote of the full membership of the board of [trustees] approving him[/her].”

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.430 Compensation – personal services and N.J.S.A. 18A:27-1 Appointment of teaching staff members; vote required

**Required Action(s):**

The charter school must obtain approval from their board for staff members to perform grant-funded activities. The corresponding board meeting minutes must include at a minimum, the pertinent information summarized in this finding.

**Finding 4:**

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000.00. Such purchase orders meet one of a number of definitions of a covered transaction in 2 C.F.R. §180.220. Before entering into covered transactions, these regulations require the charter school to determine the vendor is not debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The covered transactions tested lacked any indication that verifications of this nature are being performed. Verifications may be accomplished by:

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

1. checking the SAM Exclusions maintained by the General Services Administration and available at [SAM.gov | Home](https://sam.gov);
2. collecting a certification from the entity; or
3. adding a clause or condition to the covered transaction with that entity (2 C.F.R. section 180.300).

Copies of written evidence demonstrating performance of the requisite verifications must be maintained. In addition to items 1 and 2 above, other examples of evidence include printouts of search results from SAM, imprints from an ink stamp, or Avery labels affixed to purchase orders memorializing performance of this verification.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment

**Required Action(s):**

The charter school is required to implement procedures to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000.00. In addition, the charter school must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

**Finding 5:**

The charter school is not submitting reimbursement requests for one or more federal awards on a monthly, or at least quarterly basis.

Pursuant to the Uniform Grant Guidance, LEAs must minimize the time elapsing between the receipt of funds from NJDOE for reimbursement purposes and the payment of grant expenditures. To this end, the department's guidance on reimbursement requests authorizes LEAs to claim expenditures that:

1. *have already been paid*; or
2. will be paid within three (3) days of receipt of its reimbursement check.

In order to comply with number 2 above, the charter school should only request the reimbursement of expenditures for invoices in hand and determined to be accurate.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal Payment, [Office of Grants Management, General Federal Entitlement Grant Guidance](#) and [Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

Maria L. Varisco-Rogers Charter School  
Collaborative Monitoring Report  
June 2023

**Required Action(s):**

The charter school is required to submit reimbursement requests on a monthly basis, or at least quarterly. In addition, the charter school is responsible for maintaining supporting documentation for seven (7) years and for making it available to the NJDOE, the U.S. Department of Education, and/or their authorized representatives upon request.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of every finding and implementation of all required actions and recommendations contained in this report.

If you have any questions, please contact Lisa D. McCormick via phone at (609) 376-3608 or via email at [lisa.mccormick@doe.nj.gov](mailto:lisa.mccormick@doe.nj.gov).