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Department of Education
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Jersey City Global Charter School

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New Jersey K to 12 Education

Collaborative Monitoring Report
June 2025

Charter School: Jersey City Global Charter School
County: Hudson
Dates Monitored: March 18, 19, 20 and 21, 2025
Case Number: CM-09-25

Funding Sources:

| Program | Funding Award |
|----------------------------------|----------------------|
| Title I, Part A | 300,962 |
| Title I SIA | 0 |
| Title II, Part A | 19,312 |
| Title III | 0 |
| Title III Immigrant | 0 |
| Title IV, Part A | 0 |
| IDEA Part B, Basic and Preschool | 87,833 |
| Perkins V | 0 |
| Total Funds | <hr/> 408,107 <hr/> |

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Background

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

The NJDOE visited the Jersey City Global Charter School (JCGCS 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 JCGCS 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); and
- IDEA Part B - Basic and Preschool.

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

- accounting records
- annual audits
- board of education (board) meeting minutes
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders

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The scope of work also included interviews with appropriate charter school staff regarding the administration of the aforementioned programs/grants.

Expenditures Reviewed

The grants and programs reviewed included Title I, Title II-A, Title III, Title IV-A, and IDEA Basic and Preschool from July 1, 2024 through January 30, 2025. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

General Overview of Used of Federal Funds

Title I, Part A Projects

The purpose of Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

JCGCS is a PreK–8 charter school that operates a school-wide program model. The charter school uses its FY 2025 Title I funds primarily for:

1. instructional staff in-class support;
2. instructional materials and supplies;
3. increased learning time;
4. extended day/year programs;
5. professional development activities; and
6. parent and family engagement.

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.

JCGCS has outlined plans in its FY 2025 ESEA Consolidated Subgrant Application to use Title II-A funds to promote high-quality instruction and instructional leadership.

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Title III Projects

The purposes of the Title III, Part A and Title III, Immigrant program include the following:

1. help ensure that multilingual learners (MLs), 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 high levels in academic subjects so that all MLs 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 MLs, 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 MLs, including immigrant children and youth, to enter all English instructional settings; and
5. promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of MLs.

Note: The term multilingual learner is synonymous with “English learner” or “English language learner.” Sources which are cited from the United States Department of Education may still reference the use of the term English learner or EL. The NJDOE recognizes that multilingual learners may enter New Jersey’s schools with a level of proficiency in a world language other than English. The NJDOE will use “Multilingual Learner” and “ML,” respectively, to shift to asset-based language and honor a student’s primary language.

In FY 2025, JCGCS refused its Title III allocation of \$3,241. Even so, the charter school is still required to comply with the programmatic requirements of Title III, Part A.

Title IV-A Projects

The purpose of Title IV-A is to improve students’ academic achievement by increasing the capacity of LEAs to:

1. provide all students with access to a well-rounded education;
2. improve school conditions for student learning; and
3. improve the use of technology in order to improve the academic achievement and digital literacy of all students.

In FY 2025, JCGCS transferred its Title IV-A allocation of \$19,851 to Title I.

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IDEA

The purpose of the IDEA Grant is to provide Federal entitlement funds to assist with the excess cost of providing special education and related services to students with disabilities. FY 2025 IDEA Basic funds are being used to contract with agencies offering child study team educational services to students with disabilities. Preschool funds are being used to purchase instructional supplies for students with disabilities.

Detailed Findings and Recommendations

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

1. Multiple Grants Section – findings necessitating correction, or the reversal of charges due to the lack of adequate supporting documentation, for multiple grants.
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 (*).
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

The review of the charter school's 2024-2025 Title I programs yielded the following programmatic recommendation(s), and fiscal findings which are addressed below and more broadly, in the Administrative Section.

Recommendation(s):

These recommendations are presented to assist the charter school in continuing to strengthen and enhance its Title I, Part A programs and services:

- The NJDOE recommends the charter school ensure the identified needs in the ESEA Consolidated Subgrant Application accurately reflect specific academic needs of students who are not achieving State academic standards. At the time of the monitoring visit, the identified needs listed specific expenditures and/or programs (e.g., "NJCU Teacher Interns").
- The NJDOE recommends 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

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Consolidated Subgrant Applications. In addition, it is recommended that the charter school institute policies and procedures to ensure all board meeting 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 1:

During the monitoring, the charter school provided for examination purchase order (PO) number P202500137 in the amount of \$21,894. The PO was issued to Linkit! on July 1, 2024 and is reflected on the charter school's Expenditure Account Detail (EAD) report. However, a copy of the vendor's corresponding invoice was not furnished as requested. This is not an isolated occurrence as noted in Title I Finding 2.

The charter school also furnished P202400360 dated June 20, 2024 for the same dollar amount and vendor. The EAD lacks any indication that this PO was voided due to the issuance of P202500137 less than two weeks later. This raises concern that the aforementioned POs are duplicative.

Pursuant to the Uniform Grant Guidance, the charter school is required to maintain records which demonstrate the costs charged to the grant are:

1. necessary, reasonable, and allocable to the Federal award; and
2. adequately documented.

Citation(s):

Uniform Grant Guidance, Subpart E – Cost Principles 2 C.F.R. §200.403 Factors affecting allowability of costs, §200.404 Reasonable costs and §200.405 Allocable costs

Required Action(s):

The charter school is required to submit copies of the following documentation to the Office of Fiscal Accountability and Compliance (OFAC) via the Collaborative Federal Monitoring (CFM) Homeroom Application within thirty (30) days of the issuance of this report of examination (ROE):

1. Title I EAD reports for the period July 1, 2023 through September 30, 2024;
2. an Excel spreadsheet reconciling the expenditures from item 1 to the charter school's FY 2024 Title I Final Expenditure Report;
3. records which adequately explain and document why the issuance of PO P202500137 was necessary; and
4. invoices obtained by the charter school from Linkit! for POs P202400360 and P202500137.

Otherwise, the charter school is required to reverse the FY 2025 Title I expenditure of \$21,894, and upload copies of the following records as part of the submission of its CAP:

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1. updated Title I EAD reports for the period July 1, 2024 through September 30, 2025 evidencing the reversal;
2. Disbursement Adjustment report for the same period in item 1; and
3. an Excel spreadsheet reconciling the expenditures from item 1 to the charter school's FY 2025 Title I Final Expenditure Report.

Finding 2:

The charter school provided for examination POs 202500106 and P202500108 issued to Catapult Learning, LLC in the amounts of \$27,550 and \$61,000, respectively. In a manner consistent with Finding 1, the charter school did not furnish copies of corresponding invoices as requested. Rather, alternate documentation such as activity logs, presentation handouts, staff attendance sign-in sheets were furnished to demonstrate that services were rendered in order to substantiate the associated costs. Even so, the recurrence of such an anomaly is unacceptable. Sound business practices and an effective system of internal controls necessitate the charter school business office staff:

1. receive invoices from vendors prior to payments for goods and services;
2. maintain the invoices on file in accordance with state regulations governing retention of the LEAs' financial records; and
3. produce invoices requested for examination during audits or monitorings by NJDOE.

Citation(s):

Uniform Grant Guidance, §200.302 Financial management, §200.303 Internal controls, and Subpart E – Cost Principles §200.403 Factors affecting allowability of costs

Required Action(s):

The charter school is required to contact its vendor, obtain copies of all invoices for the POs identified in this finding, and submit copies of the records to OFAC via the CFM Homeroom Application within thirty (30) days of the issuance of this ROE.

If the charter school does not provide these records, OFAC will conduct a comprehensive review of non-payroll transactions charged to FY 2026 Title I awards to ensure the proper maintenance of invoices in conjunction with its CAP follow-up procedures.

Title II-A

The review of the charter school's 2024-2025 Title II-A programs yielded no programmatic or fiscal findings.

Title III

The review of the charter school's 2024-2025 Title III programs yielded the following programmatic recommendation(s).

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Recommendation(s):

The charter school is encouraged to accept Title III funds from future allocations. By refusing these funds, eligible Title III students do not receive the benefit of Federally funded services that will improve these students' academic achievement. Below are resources the charter school can use related to using their Federal funds:

- [Allowable uses for Title III and Title III Immigrant Federal Funding](#) provides examples for how these title monies can be spent to support multilingual learners progress toward English language proficiency.
- Other examples on using Federal funds can be viewed on the NJDOE's webpage, [Maximizing Federal Funds](#).

If the charter school's annual, Title III, Part A allocation is less than \$10,000, the charter school has the option to join a consortium in which the charter school contributes its Title III, Part A allocation to a lead LEA that acts as the fiscal agent for these funds. For assistance on how to set up or be a part of a consortium, see [Title III Funding Consortium](#).

IDEA

The review of the charter school's 2024-2025 IDEA programs yielded no programmatic findings and fiscal findings which are addressed more broadly, in the Administrative Section.

Administrative Section

Finding 1:

The charter school submitted board policies for examination which address certain Uniform Grant Guidance provisions. Some of the policies contain incorrect Uniform Grant Guidance (UGG) citations (e.g., charter school's policy on suspension and debarment) or lacked mention of pertinent requirements. For example, the aforementioned policy does not reference the applicability to contracts or purchase orders over \$25,000 unless the charter school chooses a lower threshold.

Moreover, the charter school did not provide written cost allowability procedures necessary to implement the charter school's cost allowability policy. To be compliant, such procedures cannot simply reiterate the Federal requirements or policies or goals.

Rather, the procedures should be robust and clearly identify roles and responsibilities. They should also provide a series of steps to be followed for determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award. Steps that—

- offer a detailed description of activities;

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- describe the process used throughout the entire grant life cycle, including the proper submission of applications and amendments in accordance with department instructions; and
- serve as guide and training tool for employees.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment, §200.302
(b)(6)-(7) Financial management and Subpart E - Cost Principles §§200.400 – 200.476

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 the Federal award; and
2. accept the funds upon subsequent approval of the applications.

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.

Finding 3:

On a few occasions, the charter school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). State regulations require that a *properly executed* purchase order be issued *prior* to the purchase of goods or the rendering of services.

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Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(4) Financial management and N.J.S.A. 18A:18A(2)(v) Definitions: Purchase Order

Required Action(s):

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

Finding 4:

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000. 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 whether 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:

1. checking the System Award Management (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. In addition, the charter school must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

Finding 5:

A number of purchase order voucher packets were selected and examined during monitoring. The charter school was unable to provide evidence that bids or quotes were obtained for various purchase orders (POs). Examples include but are not limited to PO numbers 202500101 and 202500108, respectively. These POs exceeded the threshold necessitating bids and quotes in accordance with:

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1. the New Jersey Public School Contracts Law (PSCL) and charter school policy; or
2. procurement standards under Uniform Grant Guidance.

When the Federal and state legislation and regulations governing procurement are in conflict, the most restrictive prevails. Federal procurement standards do not include all exemptions allowed under the PSCL, specifically, professional services.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §§200.317 - 327 Procurement Standards and N.J.S.A. 18A:18A-37(a) Award of purchases, contracts or agreement

Required Action(s):

The charter school must adhere to the PSCL or applicable provisions of the Uniform Grant Guidance, whichever is most restrictive, when obtaining goods and services.

Finding 6:

The charter school is reminded to submit reimbursement requests for its Federal awards on a monthly basis, unless otherwise precluded from doing so pending the review and approval of a related amendment application by NJDOE.

Citation(s):

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal payment and [NJDOE Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

Required Action(s):

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

Advisory Notice

Preventing Improper Use of Taxpayer Funds

Pursuant to ESEA §9203(1), 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.

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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.