



State of New Jersey

DEPARTMENT OF EDUCATION

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TRENTON, NJ 08625-0500

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*Governor*

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*Lt. Governor*

DAVID C. HESPE  
*Commissioner*

February 4, 2015

Dr. Antoinette Dendtler, School Lead  
Environmental Community Opportunity Charter School  
817 Carpenter Street  
Bridgeview Complex  
Camden, NJ 08102

Dear Dr. Dendtler:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Environmental Community Opportunity Charter School**. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2013 through December 15, 2014. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for Charter Schools Response, Corrective Action Plan and Appeal Process," the Environmental Community Opportunity Charter School Board of Trustees is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your school's website.

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Frank Basso at (609) 984-5909.

Sincerely,

Robert J. Cicchino, Director  
Office of Fiscal Accountability and Compliance

RJC/FB/dk:Environmental Community Opportunity Charter School Cover Letter/consolidated monitoring  
Enclosures

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**ENVIRONMENTAL COMMUNITY OPPORTUNITY CHARTER SCHOOL**  
817 CARPENTER STREET  
CAMDEN, NJ 08102  
PHONE: (856) 963-2627



*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**District:** Environmental Community Opportunity Charter School  
**County:** Camden  
**Dates On-Site:** November 15 and 16, 2014  
**Case #:** CM-015-14

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 204,140
IDEA Basic	53,882
IDEA Preschool	2,972
Title II, Part A	1,568
Total Funds	<hr/> <hr/> \$ 262,562 <hr/> <hr/>

**ENVIRONMENTAL COMMUNITY OPPORTUNITY CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
FEBRUARY 2015**

**BACKGROUND**

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, IDEA, Race to the Top, and Carl D. Perkins). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

**INTRODUCTION**

The NJDOE visited the Environmental Community Opportunity Charter School to monitor the school's use of federal funds and the related program plans, where applicable, to determine whether the school's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes, and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I); Title II, Part A (Title II); IDEA Basic and Preschool for the period July 1, 2013 through December 15, 2014.

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech language specialists and an interview of the program administrator regarding the IDEA grant, as well as current school policies and procedures. The monitoring team members also conducted interviews with school personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

**EXPENDITURES REVIEWED**

The grants that were reviewed included Title I, Title II, IDEA Basic and Preschool from July 1, 2013 through December 15, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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**GENERAL OVERVIEW OF USES OF TITLE I, TITLE II, TITLE III AND IDEA FUNDS**

**Title I Projects**

The school is using its FY 2014-2015 Title I funds to implement a targeted assistance program. Primarily, the school provides supplemental instructional opportunities through in-class support (Response To Intervention). The school is also planning to run an extended day program in the spring. Prior year funds were spent on similar programs.

**Title II Projects**

The school did not receive Title II funds in FY 2013-2014. Title II funds for FY 2014-2015 have yet to be expended. The school will commit Title II funds to professional development activities in accordance with the District Professional Development Plan.

**IDEA Projects (Special Education)**

The FY 2014-2015 IDEA funds are being used to partially fund a special education teacher, a child study team supervisor, and consultants to provide related services and child study team services.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

A review of the Title I program yielded no findings.

**Finding 1:** The school failed to submit a timely TPAF/FICA reimbursement report for FY 2013-2014. The report was due October 1, 2014 and was filed on or about November 6, 2014. The liquidation of \$33,341.75 was paid after the state imposed 45 day liquidation period and is not allowed to be charged to the FY 2013-2014 final report

**Citation:** N.J.S.A. 18A:66-90, *Reimbursement of TPAF/FICA*; EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 23, Period of Availability of Funds.

**Required Action:** The late payment of FY 2013-2014 encumbered amount is being referred to the Office of Fiscal Accountability and Compliance for follow up.

**Title II**

A review of the expenditures charged to the Title II grant yielded no findings.

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**IDEA (Special Education)**

**Finding 2:** The school did not have in place a special education parent advisory group to provide input to the school on issues concerning students with disabilities.

**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. In order to demonstrate correction of noncompliance, the school must organize and establish a parent advisory group. A monitor from NJDOE will conduct an on-site visit to interview staff and review the list of members of the special education parent advisory group and agendas for meetings held subsequent to the monitoring visit.

**Finding 3:** The school did not document all required considerations and statements in each IEP.

IEPs for students eligible for special education and related services did not consistently include:

- methods for evaluating progress on academic goals and objectives; the specific amount of time that the special education teacher will be in the classroom for students receiving in-class support services; and
- documentation of the consideration of the need for extended school year services.

IEPs for students eligible for speech-language services did not include a specific location for providing services.

**Citation:** N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f), 4.10(a); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

**Required Action:** The school must ensure each IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and the speech-language specialist and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, to demonstrate correction of individual instances of noncompliance, the school must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs along with a random sample of IEPs developed at meetings conducted between March 2015 and May 2015, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor. For assistance with correction of noncompliance, the school is referred to the state IEP sample form which is located at: [www.statenj.us/education/specialed/forms](http://www.statenj.us/education/specialed/forms).

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**Finding 4:** The school did not consistently document the following in the IEPs of students removed from the general education setting for more than 20 percent of the day:

- the supplementary aids and services considered, and/or an explanation of why they were rejected;
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- the potentially beneficial or harmful effects which a placement (general education) may have on the student with disabilities or the other students in the class.

**Citation:** N.J.A.C. 6A:14-4.2 (a)8(i),(ii) and (iii), 4.2(a)4.

**Required Action:** The school must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. 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 citations 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 the specific students that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs along with a random sample of IEPs developed at meetings conducted between March 2015 and May 2015, and to 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 5:** The school did not consistently convene meetings for reevaluation planning and the annual review to develop an IEP, with required participants for students eligible for special education and related services.

**Citation:** N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(4); and 34 CFR §300.321(a).

**Required Action:** The school must ensure meetings are conducted with required participants and that documentation of attendance is maintained in student records. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation, including sign in sheets, for meetings conducted between March 2015 and May 2015, and to review the oversight procedures.

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**Finding 6:** The school did not consistently conduct reevaluations within three years of the previous classification date for students currently eligible for special education and related services and for students currently eligible for speech-language services.

**Citation:** N.J.A.C. 6A: 14-3.8(a) and 20 U.S.C. §1414(a)(2).

**Required Action:** The school must ensure reevaluations are conducted within required time lines. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and the speech-language specialist and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review time lines for students due for reevaluation between March 2015 and May 2015, and to review the oversight procedures.

**Administrative**

**Finding 7:** The school did not have the required supporting documents to verify the activity of staff charged to the Title I and IDEA grants, but did have the supporting schedules. The documentation must reflect what personnel are doing and must match their funded percentage. This documentation is necessary to verify that grant funded personnel are performing responsibilities consistent with the intent and purpose of the grant.

**Citation:** OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services)*.

**Required Action:** The school must verify the time and activities of staff charged to the grant and submit one timesheet for FY 2014-2015 to the NJDOE for review.

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 Frank Basso via phone at (609) 984-5909 or via email at [frank.basso@doe.state.nj.us](mailto:frank.basso@doe.state.nj.us) .