



State of New Jersey

DEPARTMENT OF EDUCATION  
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TRENTON, NJ 08625-0500

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Commissioner

January 5, 2016

Mrs. Riscee Langhorne, School Administrator  
Kingdom Charter School of Leadership  
121 West Church Street  
Blackwood, NJ 08012

Dear Mrs. Langhorne:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Kingdom Charter School of Leadership. 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, 2014 through November 16, 2015. 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 Kingdom Charter School of Leadership Board of Trustees is required, pursuant to N.J.A.C. 6A:23A-22.7, 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-22.7, 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 Carla Spates at (609) 984-5968.

Sincerely,

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

RJC/CS/dk: Kingdom CS/consolidated monitoring  
Enclosures

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DEPARTMENT OF EDUCATION  
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**KINGDOM CHARTER SCHOOL OF LEADERSHIP**  
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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
JANUARY 2016**

**District:** Kingdom Charter School of Leadership  
**County:** Camden  
**Dates On-Site:** November 16, 17, and 18, 2015  
**Case #:** CM-012-15

**FUNDING SOURCES**

Program	Funding Award
Title I, Part A	\$ 56,505
Title II, Part A	802
IDEA Basic	108,921
Total Funds	<u>\$ 166,228</u>

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**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 and IDEA). The laws further require 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 Kingdom Charter School of Leadership 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); and IDEA Basic for the period July 1, 2014 through November 16, 2015.

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 district 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 reviewed included Title I, Title II, and IDEA Basic from July 1, 2014 through November 16, 2015. 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 AND TITLE II AND IDEA FUNDS**

**Title I**

The school is using its FY 2015-2016 Title I funds to implement a schoolwide program. Primarily, the school is using its allocation to support the salaries of the school principal and an academic interventionist.

**Title II**

The school is using its FY 2015-2016 Title II funds to implement a schoolwide program. Primarily, the school is using its allocation to support the salaries of the school principal and an academic interventionist who leads professional development for all teachers.

**IDEA (Special Education)**

The FY 2015-2016 IDEA funds are being used for purchased professional and technical services (consultants to provide related services and child study team services).

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The school did not properly procure funds under the Uniform Guidance which requires purchases over \$3,000 (Simplified Acquisition Threshold) to have formal quotes or bids. The contracts for services with Renaissance School Services and American Reading Company exceeded the maximum allowable amount and needs to be formally quoted or bid.

**Citation:** 2 CFR§200.320: Methods of procurement.

**Required Action:** The school must begin the process of seeking formal quotes or bids for the services offered by Renaissance School Services and American Reading Company, or reverse the charges for to these two vendors, which were incurred in violation of the Uniform Grant Guidance. The school must submit either documentation of its quote/bid process or the adjusting journal entry to the NJDOE for review.

**Finding 2:** The school did not disclose that a competitive bid was funded through federal funds as required under the Steven's Amendment.

**Citation:** Public Law 100-463, Section 8136: Department of Defense Appropriations Act, Steven's Amendment.

**Required Action:** The school must develop procedures to disclose the inclusion of the Stevens Amendment in future bid packages. The school must send a copy of these procedures to the NJDOE for review.

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**Finding 3:** The school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order) for supplies from American Reading Company. The invoice was dated August 14, 2015 and the purchase order was issued September 18, 2015. School policy and state regulations require a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

**Citation:** 2 CFR §200.302: Standards for financial and program management systems. N.J.S.A. 18A: 18A(2)(v) Public School Contracts Law.

**Required Action:** The school must develop procedures to issue purchase orders to all vendors prior to goods or services being provided.

**Title II**

**Finding 4:** The school did not have district-based or school-based professional development plans. All schools and districts in New Jersey are required to create an annual district professional development plan and all schools are required to create a school-level professional development plan. Activities in the school-level plans must be consistent with the district professional development plan. The district-level and school-level plans must align with New Jersey's definition of Professional Development and Professional Development Standards for Teachers and the New Jersey Standards for Professional learning.

**Citations:** ESEA §2122: *Local Applications and Needs Assessment*. N.J.A.C. 6A:9-15.5: School-Level Professional Development Planning Requirements. N.J.A.C. 6A:9-15.6: District-Level Professional Development Planning Requirements

**Required Action:** The school must create a professional development plan that is consistent with professional development funded activities. The school must submit the professional development plans to the NJDOE for review.

**IDEA (Special Education)**

**Finding 5:** The school did not consistently provide parents of students eligible for special education and related services notice of meetings.

**Citation:** N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(b)(1); and 34 CFR §300.304(a)

**Required Action:** The school must ensure parents are provided notice of a meeting in writing, containing all required components, early enough to ensure the parent has an opportunity to attend. 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 meeting documentation for meetings conducted between March 2016 and May 2016, and to review the oversight procedures.

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**Finding 6:** The school did not consistently provide parents written notice containing all required components, within 15 calendar days following meetings for students eligible for special education and related services.

**Citation:** 20 U.S.C. §1414(b); 34 CFR §300.503(a-c); and 34 CFR §300.504) and N.J.A.C. 6A:14-2.3(f) and 2.3(g).

**Required Action:** The school must ensure parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the school must provide 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 an on-site visit to interview staff, review copies of written notice provided to parents following meetings conducted between March 2016 and May 2016, and to review the oversight procedures.

**Finding 7:** The school did not consistently ensure that the required participants were in attendance at identification and IEP meetings 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 and/or written parental consent to excuse a member of the team is maintained in student's 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 meeting documentation, including sign-in sheets, for meetings conducted between March 2016 and May 2016, and to review the oversight procedures.

**Finding 8:** 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 include:

- all required measurable annual goals and objectives (including method of evaluating progress); and
- specific location of related services.

**Citation:** N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); 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 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

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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 additional IEPs developed at meetings conducted between March 2016 and May 2016, 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).

**Finding 9:** 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 consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- supplementary aids and services considered;
- explanation of why the supplementary aids and services were rejected;
- comparison of the benefits provided in the regular class and the benefits provided in the special education class; and
- 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); and N.J.A.C. 6A:14-4.2 (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 the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise the 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 additional IEPs developed at meetings conducted between March 2016 and May 2016, 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 10:** The school did not consistently maintain documentation of the frequency and duration of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS).

**Citation:** N.J.A.C. 6A:14-3.3(c).

**Required Action:** The school must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner that the team identifies and maintains documentation of the frequency, and duration of the interventions. In order to demonstrate

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correction of noncompliance, the school must conduct training for administrators and members of the I&RS team 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 for students who were provided interventions in general education between March 2016 and May 2016, and to review the oversight procedures.

**Finding 11:** The school did not conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation or a speech-language evaluation to determine if an evaluation was warranted.

**Citation:** N.J.A.C. 6A:14-3.3(e), 3.4(j).

**Required Action:** The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and required participants are in attendance. In order 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. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation from identification meetings conducted between March 2016 and May 2016, and to review the oversight procedures.

**Finding 12:** The school did not consistently conduct all required sections of the functional assessment as a component of an initial evaluation for students referred for special education and related services.

**Citation:** N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(1)-(3), 1412(a)(6)(b); and 34 CFR 300.304(b)(1).

**Required Action:** The school must ensure all components of the functional assessment are conducted as part of the initial evaluation process. 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 initial evaluation reports completed between March 2016 and May 2016, and to review the oversight procedures.

**Finding 13:** 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 the NJDOE will

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conduct an on-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.

**Administration**

**Finding 14:** The school did not have formal written internal control policies and procedures to prevent contracting with disbarred vendors.

**Citation:** 2 CFR §200.317: Procurement.

**Required Action:** The school must have formal policies and procedures to prevent errors from contracting with disbarred vendors. The school must submit a copy of these policies and procedures to the NJDOE for review.

**Finding 15:** The school did not have formal written internal control policies and procedures for requesting reimbursement from the Electronic Web-Enabled Grant or System for Administering Grants Electronically systems.

**Citation:** 2 CFR §200.302(b)(3): Financial.

**Required Action:** The school must have a formal board policy concerning the reimbursement of grant funds.

**Finding 16:** The school did not provide evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law (PSCL) [N.J.S.A. 18A:18A-10(c)], a board of education may place its order with a vendor offering the lowest price, including delivery charges, that best meets the requirements of the board of education. However, for all federal funds, districts need to review 2 CFR §200.317: Procurement Standards requirements. The federal procurement regulations under this section do not include all the exemptions allowed under the PSCL and therefore, these federal regulations require schools to competitively contract or bid all goods and services under the bid threshold, whether exempt under PSCL or not. The federal rules do include provisions for procurement by “noncompetitive proposals,” but only under certain circumstances.

**Citation:** 2 CFR §200.317: Procurement Standards; N.J.S.A. 18A:18A-10(c): Public School Contracts Law.

**Required Action:** The school should review 2 CFR §200.317: Procurement Standards and use open and competitive procedures where at all possible. The school should also analyze and include documentation in its files demonstrates the district ensured the costs were reasonable.

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.

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If you have any questions, please contact Carla Spates via phone at (609) 984-5909 or via email at [carla.spates@doe.state.nj.us](mailto:carla.spates@doe.state.nj.us) .