



State of New Jersey
DEPARTMENT OF EDUCATION
PO Box 500
TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor
KIM GUADAGNO
Lt. Governor

KIMBERLEY HARRINGTON
Acting Commissioner

January 18, 2017

Ms. Andrea Surratt, Principal
Camden Community Charter School
415 North 9th Street
Camden, NJ 08102

Dear Ms. Surratt:


The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the Camden Community Charter School. The funding source reviewed was the Individuals with Disabilities Education Act. The review covered the period July 1, 2015 through November 30, 2016. 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/compliance/monitor/>.

Utilizing the process outlined in the attached "Procedures for Charter School Response, Corrective Action Plan and Appeal Process," the Camden Community 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 Carla Spates at (609) 984-5909.

Sincerely,


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

RJC CS I: Camden Comm. Charter School BOE Cover Ltr.consolidated monitoring.doc
Enclosures

www.nj.gov/education

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CAMDEN COUMMUNITY CHARTER SCHOOL
415 North 9th Street
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JANUARY 2017**

District: Camden Community Charter School
County: Camden
Dates On-Site: November 30, 2016
Case #: CM-013-16

FUNDING SOURCES

Program	Funding Award
IDEA Basic	\$ 135,600
Total Funds	<u>\$ 135,600</u>

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

BACKGROUND

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require that districts provide programs and services based on the requirements specified in each of the authorizing statutes (i.e., ESEA, IDEA, 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. Due to the impending implementation of new ESSA regulations, only IDEA and Special Education will be reviewed during consolidated monitoring.

INTRODUCTION

The NJDOE visited the Camden Community 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 IDEA Basic and Special Education programs for the period July 1, 2015 through November 30, 2016.

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, and current district policies and procedures. The monitoring team members reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews, as well as, interviews with program administrators and other school personnel as required. Additionally, the IDEA grant reviews included 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, and interviews of child study team members and speech-language specialists.

EXPENDITURES REVIEWED

The IDEA Basic grant review included a sampling of purchase orders taken from the entire population and later identified as to the IDEA grant for the period July 1, 2015 through November 30, 2016.

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

GENERAL DISTRICT OVERVIEW OF USES OF IDEA GRANT FUNDS

IDEA Projects

The FY 2017 Individuals with Disabilities Education Act (IDEA 2004) Basic funds are being used to provide related services (speech therapy, occupational therapy and physical therapy) for students with disabilities.

DETAILED FINDINGS AND RECOMMENDATIONS

IDEA Grant

A review of the expenditures charged to the IDEA grant determined there were no findings to report.

IDEA (Special Education)

Finding 1: The school did not document all required considerations and statements in each IEP for students eligible for special education and related services. IEPs did not include:

- identification of the post-secondary liaison for students turning age 14; and
- required goals and objectives for all academic subjects taught in a pull-out replacement setting.

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 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 and a random sample of additional IEPs developed at meetings conducted between March 2017 and June 2017, 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.nj.gov/education/specialed/form.

Finding 2: 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, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

- the supplementary aids and services considered, and/or an explanation of why they were rejected; and
- a comparison of the benefits provided in the regular class and the benefits provided in the special education class.

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

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 that were identified as noncompliant. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, review a random sample of additional IEPs developed at meetings conducted between March 2017 and June 2017, 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 3: The school did not consistently provide parents of students eligible for special education and related services and students eligible for speech-language services notice of a meeting for identification, reevaluation planning, and eligibility/IEP 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 provide parents notice of a meeting in writing containing all required components; early enough to ensure they have an opportunity to attend. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review meeting documentation for meetings conducted between March 2017 and June 2017, and to review the oversight procedures.

Finding 4: The school did not consistently provide parents written notice containing all required components, including a request for consent when required, within 15 calendar days following identification, reevaluation planning and eligibility meetings for students eligible for special education and related services and eligible for speech and language 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).

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

Required Action: The school must ensure parents are provided written notice following a meeting containing 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 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 an on-site visit to interview staff, review copies of written notice sent to parents following meetings conducted between March 2017 and June 2017, and to review the oversight procedures.

Finding 5: The school did not consistently provide to students beginning at age 14, written invitations to meetings where post-school transition was being discussed.

Citation: N.J.A.C. 6A:14-2.3(k)2x; and 34 CFR §300.322(a)(2).

Required Action: The school must ensure each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed. 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 copies of invitations to IEP meetings to students age 14 and above for meetings conducted between March 2017 and June 2017, and to review the oversight procedures.

Finding 6: The school did not consistently ensure the required participants were in attendance at meetings for students eligible for speech-language services and 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 documentation of attendance and/or written parental consent to excuse a member of the team is maintained in student files. In order to demonstrate correction of noncompliance, the school must provide 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 an on-site visit to interview staff, review meeting documentation, including the sign in sheets, for meetings conducted between March 2017 and June 2017, and to review the oversight procedures.

Finding 7: The school did not consistently maintain documentation of the description, frequency, duration and effectiveness 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).

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

Required Action: The school must ensure when the I&RS team identifies interventions to meet the needs of a struggling learner that the team identifies and maintains documentation of the nature, description, frequency, and duration of the interventions and measures the effectiveness. In order to demonstrate correction of noncompliance, the school must conduct training for administrators and I&RS staff 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 I&RS team members and teachers, review documentation for students who were provided interventions in general education between March 2017 and June 2017, and to review the oversight procedures.

Finding 8: The school did not document teachers were informed of their responsibilities regarding implementation of IEPs of students eligible for special education and related services and students eligible for speech language services.

Citation: N.J.A.C. 6A:14-3.7(a)2-3; 20 U.S.C. §1412(a)(5); and 34 CFR §300.119.

Required Action: The school must ensure teachers have access to student IEPs and review their responsibilities regarding implementation of those IEPs. In order to demonstrate correction of noncompliance, the school must develop procedures to ensure teachers who have instructional responsibility for students with disabilities have been informed of their responsibilities in implementing the IEP and that the school maintains documentation verifying such. The procedures must include an oversight mechanism to ensure continued compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of teacher review of IEPs, and to review the oversight procedures.

Finding 9: The school did not consistently conduct multi-disciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher.

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

Required Action: The school must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher detailing the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the school must conduct training for 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 an on-site visit to interview staff, review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between March 2017 and June 2017, and to review the oversight procedures.

Finding 10: The school did not consistently conduct all required sections of the functional assessment as a component of initial evaluations for students referred for special education and

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

related services. Specifically, evaluation reports did not consistently include an observation of the student in other than a testing setting.

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); 34 CFR 300.304(b)(1).

Required Action: The school must ensure all components of the functional assessment are conducted as part of all initial evaluations. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students evaluated between March 2017 and June 2017, and to review the oversight procedures.

Finding 11: The school did not consistently conduct reevaluations within three years of the previous classification date for students eligible for special education and related 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 timelines with required participants in attendance. 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 citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of eligibility meetings held as part of the reevaluation process between March 2017 and June 2017, and to review the oversight procedures.

Finding 12: 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 conduct an on-site visit to interview staff and review the list of members of the special education parent advisory group and any agendas for meetings held subsequent to the monitoring visit.

Finding 13: The school did not have Child Find procedures in place for the location and referrals of school-aged students who may have a disability.

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

**CAMDEN COMMUNITY CHARTER SCHOOL
CONSOLIDATED MONITORING REPORT
JANUARY 2017**

Required Action: The school must ensure Child Find procedures are in place to ensure the location and referral of school-aged students who may have a disability. In order to demonstrate correction of noncompliance, the school must conduct training for school personnel 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 and review Child Find documentation, and review the oversight procedures.

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 Carla Spates via phone at (609) 984-5909 or via email at carla.spates@doe.state.nj.us.