



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

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*Lt. Governor*

CHRISTOPHER D. CERF  
*Commissioner*

September 4, 2013

Ms. Richelle Baugh, School Administrator  
Camden's Pride Charter School  
879 Beideman Avenue  
Camden, NJ 08105

Dear Ms Baugh:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Camden's Pride 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, 2011 through June 24, 2013, 2013. 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 Camden's Pride 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 Anthony Hearn at (609) 633-2492.

Sincerely,

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

RJC/LR/dk:Camden's Pride Charter School Cover Letter/consolidated monitoring  
Enclosures

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*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
SEPTEMBER 2013**

**District:** Camden's Pride Charter School  
**County:** Camden  
**Dates On-Site:** June 24 and 25, 2013  
**Case #:** CM-009-12

**FUNDING SOURCES**

Program	Funding Award
Title I	\$ 217,709
IDEA Basic	52,238
IDEA Preschool	1,062
Title IIA	674
Total Funds	<u>\$ 271,683</u>

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**BACKGROUND**

The Elementary & 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 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 Camden's Pride 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 IIA; and IDEA for the period July 1, 2011 through June 24, 2013 and planned expenses for the current year (2012-2013).

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 IIA and IDEA from July 1, 2011 through June 24, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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**GENERAL DISTRICT OVERVIEW OF USES OF TITLE I AND IDEA FUNDS**

**Title I Projects**

The school used its FY 2012-2013 Title I funds to implement a schoolwide program. Primarily, the district provided supplemental instructional opportunities through in-class support, extended day and extended year programs. The school also used Title I funds to support increased use of technology (iPads) and professional developments.

**IDEA Projects (Special Education)**

The FY 2013 IDEA funds were used to fund child study team administrative salaries and contracted services (evaluations, case management and consultation) through Salem County Special Services School District.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The school does not have the required supporting documents to verify the activity of staff charged to the Title I grants at the school. The documentation must reflect what the staff is doing and when (time slots) and must match their funded percentage. This documentation is necessary to ensure grant funded staff are actually performing grant-related responsibilities.

**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 identify staff members whose salaries are supported in whole or in part with Title I funds and verify the time and activity of staff charged to the grant. The school must submit a revised list of FY 2012-2013 funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review.

**Finding 2:** The school does not have a comprehensive equipment inventory for items purchased with Title I funds. The inventory is necessary to ensure grant funded equipment is easily identifiable.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 32, Equipment.

**Required Action:** The school must develop a system to track equipment purchased with federal grants. Although the state threshold for reporting equipment is \$2,000 in the Electronic Web Enabled Grant (EWEG) system, the school may have its own lower threshold. The school must track any amount that is less expensive to track than it is to replace. The inventory must include a list of all items with the corresponding tag number, cost, location, purchase date, grant source that funded the purchase and a

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description of the item. The school must submit a comprehensive inventory of all equipment purchased to the NJDOE for review.

**Finding 3:** The school does not have a parental involvement program that reflects the requirements of the Title I legislation. The school did not convene the annual Title I Parent Meeting or develop the school-level Title I parental involvement policy. The exclusion of parents in the development of these documents does not offer them the opportunity for full participation in their child's educational program.

**Citation:** ESEA §1118: *Parental Involvement*.

**Required Action:** For the 2013-2014 school year, the school must convene the annual Title I parent meeting no later than October 15, 2013. The school must also engage parents in the development of the school-level parental involvement policy. The school must submit documentation of both the annual meeting and the process to engage parents in the development of the parental involvement policy, as well as an invitation, agenda and meeting notes to the NJDOE for review. Acceptable documentation includes copies of information and policies

**Title IIA**

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

**IDEA (Special Education)**

**Finding 4:** The school did not demonstrate that it met the standards of maintenance of effort. All necessary financial information needs to be entered into New Jersey's System for Administering Grants Electronically (SAGE) to show it met the requirement and substantiates the figures as shown in the IDEA grant.

**Citation:** 34 CFR §300.203 (a-b). Maintenance of Effort - Funds provided to an LEA under Part B of the Act must not be used to reduce the level of expenditures for the education of children with disabilities made by the LEA from local funds below the level of those expenditures for the preceding fiscal year.

**Required Action:** The school must enter maintenance of effort information into the SAGE system and provide all supporting information to the NJDOE for review.

**Finding 5:** The school did not consistently implement each student's IEP as written. Specifically:

- speech-language services were not provided as required by the IEP; and
- IEPs indicated that services would be provided in a pull-out resource program; however that program was not provided during the 2012-2013 school year.

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**Citation:** N.J.A.C. 6A:14-3.74.1(a); 20 USC 1414(d)(A)(IV); and 34 CFR §300.320(a)(4) .

**Required Action:** The school must ensure each student determined eligible for special education and related services or eligible for speech–language services receives all programs and services identified in the IEP. 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. To demonstrate the school has corrected the individual instances of noncompliance, the school must review all student IEPs and verify the programs and services identified in the IEP are implemented as written. For students whose IEPs were identified as noncompliant, and for students whose programs are not being implemented as written, the school must determine with parent input, the need for compensatory services. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation demonstrating the provision of compensatory services, implementation of IEPs developed for the 2013-2014 school year, and the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor.

**Finding 6:** The school did not consistently provide parents with notice of a meeting that contains all required components for students eligible for special education and related services and for students eligible for speech-language services. Additionally, notice of IEP meetings did not inform the parent of their right to invite others with expertise to the meetings.

**Citation:** N.J.A.C. 6A:14-2.3(k); 20 U.S.C. §1414(d)(1)(B)(i); and 34 CFR §300.322.

**Required Action:** The school must ensure parents are provided with notice of meetings that contains all required components. 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 notices for meetings conducted between September 2013 and January 2014, and to review the oversight procedures.

**Finding 7:** The school did not consistently provide written notice to parents containing all required components.

**Citation:** N.J.A.C. 6A:14-2.3(f), (g), and (h); 20 U.S.C. §1415(b)(3) and(4); and 34 CFR §300.503.

**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 speech-language specialists regarding the procedures for implementing the requirements in the citations listed above. In addition, a monitor from the NJDOE will conduct an on-

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site visit to interview staff, review copies of written notice sent to parents following meetings conducted between September 2013 and January 2014, and review the oversight procedures.

**Finding 8:** The school did not consistently provide copies of evaluation reports to parents at least 10 days prior to the eligibility meeting for students evaluated for special education and related services.

**Citation:** N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(a).

**Required Action:** The school must ensure the provision of copies of evaluation reports to parents not less than 10 days prior to the eligibility meeting. 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 documentation of provision of reports to parents referred for evaluation between September 2013 and January 2014, and review the oversight procedures.

**Finding 9:** The school did not consistently obtain written parental consent for implementation of the initial IEP for students eligible for special education and related services.

**Citation:** N.J.A.C. 6A:14-2.3(a)2; 20 U.S.C. §1414(a)(1)(D) and 1414(c); and 34 CFR §300.300(b).

**Required Action:** The school must ensure written parental consent to implement the initial IEP is obtained prior to implementation. 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 copies of initial IEPs developed between September 2013 and January 2014, and review the oversight procedures.

**Finding 10:** The school did not consistently conduct an annual IEP team meeting for each student eligible for special education and related services.

**Citation:** N.J.A.C. 6A:14-3.7(i); 20 U.S.C. §1414(d)(4)(B); and 34 CFR §300.324(b)(1).

**Required Action:** The school must ensure IEP team meetings are conducted annually, or more often if necessary, to review, revise and determine the programs and placement of each classified student. 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. Additionally, the school must review the IEPs of all students receiving special education and related services and ensure they are current. The school must conduct annual review



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meetings to review/revise IEPs for the specific students whose IEPs were identified as noncompliant during monitoring along with any other IEPs that are not current. A monitor from the NJDOE will conduct an on-site visit to interview staff, review revised IEPs, review IEPs developed between September 2013 and January 2014, and 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 11:** The school did not consistently convene meetings to determine eligibility with the required participants, for students eligible for special education and related services and for students eligible for speech-language services.

**Citation:** N.J.A.C. 6A:14-2.3(k)1; 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a)(I).

**Required Action:** The school must ensure meetings are conducted with required participants and that documentation of attendance is maintained in students' files. 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, including sign in sheets, for meetings conducted between September 2013 and January 2014.

**Finding 12:** The school did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services and speech-language services. Specifically, IEPs developed for students eligible for special education and related services did not consistently document the following:

- location of the provision of related services;
- amount of time the in-class resource teacher is in the general education classroom;
- statement of how progress towards annual goals will be measured; and
- statement of how the student's disability affects his/her involvement and progress in the general curriculum.

In addition, IEPs developed for students eligible for speech-language services did not consistently document the following:

- statement of how progress toward annual goals will be measured; and
- inclusion of the strengths of the student in the statement of Present Levels of Academic Achievement and Functional Performance.

**Citation:** N.J.A.C. 6A:14-3.7(c), (e) , 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 that each IEP contains all required components. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and speech-language specialists and

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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 IEPs for 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, review IEPs developed for students whose annual review meetings were conducted between September 2013 and January 2014, and review the oversight procedures. For assistance with correction of noncompliance, the charter 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). The names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor.

**Finding 13:** The school did not consistently document in the IEPs of students eligible for special education and related services the relevant factors considered in determining whether a student requires an extended school year program (ESY) with a description of the ESY program when provided.

**Citation:** N.J.A.C. 6A:14-4.3(c); 20 U.S.C. §1412(a)(1); 34 CFR §106.

**Required Action:** The school must ensure consideration of ESY is documented in the IEP. 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. Additionally, the school must conduct IEP meetings to review/revise IEPs for the specific students whose IEPs were identified as noncompliant during the monitoring. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, review IEPs of students whose annual review meeting were conducted between September 2013 and January 2014, and 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 14:** 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).

**Required Action:** The school must ensure when the I&RS team identifies interventions to meet the needs of a struggling learner, the team identifies and maintains documentation of the 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 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 I&RS team member and teachers, review documentation for students who were provided interventions in general education between September 2013 and January 2014, and review the oversight procedures.

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**Finding 15:** The school did not conduct identification meetings within 20 calendar days of receipt of a written request for an evaluation to determine eligibility for special education and related services.

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

**Required Action:** The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are 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 from meetings conducted between September 2013 and January 2014, and review the oversight procedures.

**Finding 16:** The school did not consistently conduct vision/hearing screenings and health/medical summaries for every student referred to the child study team for evaluation.

**Citation:** N.J.A.C. 6A:14-3.4(j); 3.3(g) and (h).

**Required Action:** The school must ensure vision and audiometric screenings are conducted for every student referred to the child study team with a copy of the results maintained in students' files, along with available health/medical summaries. 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 and review documentation verifying receipt of the health summary, including the vision and hearing screening, for students referred to the child study team between September 2013 and January 2014, and review the oversight procedures.

**Finding 17:** The school did not consistently conduct multidisciplinary 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 written statement from the general education teacher that details 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, reviews initial evaluation reports for students referred for speech-

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language services whose eligibility meetings were held between September 2013 and January 2014, and review the oversight procedures.

**Finding 18:** 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 and students referred for speech-language services.

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

**Required Action:** The school must ensure all components of the functional assessment are conducted as part of the initial evaluations process. 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 copies of evaluation reports prepared for students evaluated between September 2013 and January 2014, and review the oversight procedures.

**Finding 19:** The school did not maintain written certification for each child study team evaluator as to whether his/her report reflects the conclusion of eligibility of students evaluated for special education and related services.

**Citation:** N.J.A.C. 6A:14-3.4(h)5.

**Required Action:** The school must maintain the written certification of each child study team evaluator as to whether his/her evaluation report reflects the conclusion of eligibility of each student evaluated. 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 and review documentation from eligibility meetings conducted for students between September 2013 and January 2014, and review the oversight procedures.

### **Financial Management and Reporting**

**Finding 20:** A review of the school's fiscal records indicated the following issues regarding internal control and procurement:

- failing to secure vendor certification prior to payment of invoices;
- failing to charge expenses to the grant as they are incurred;
- charging incorrect staff to the Title I and IDEA grants (prior year staff were charged and then adjusted out of the grant);
- issuing purchase orders that do not match the amount charged to the grant;

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- approving financial statements that label the school as operating a targeted assistance program, rather than a schoolwide program;
- paying a lump sum to a provider prior to the services being rendered (IDEA); and
- paying invoices prior to issuing a purchase order.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement and Section 20, Standards for financial management systems. N.J.S.A 18A:18A(2)(v) *Public School Contracts Law*.

**Required Action:** The school needs to address all these issues and the necessary corrective action they are implementing to prevent these errors from occurring.

**Administrative**

**Finding 21:** The school does not have internal control policies and procedures to prevent contracting with disbarred vendors.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The school must update internal control policies to prevent errors from potentially occurring.

**Finding 22:** The school does not have formal written policies for requesting reimbursement from the EWEG or SAGE systems. However, the monitoring team did verify the school's practice for requesting reimbursement through inquiries about the school's internal controls.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 20, Standards for financial management systems.

**Required Action:** The school must have a formal board policy concerning the reimbursement of grant funds. The school must submit a copy of its written policy to the NJDOE for review.

**Finding 23:** The school has no evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law [N.J.S.A. 18A:18A:10(a)], 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 34 CFR Part 80.36 on procurement requirements. The federal procurement regulations under this section do not include all the exemptions allowed under the PSCL and therefore, these federal regulations require districts to competitively contract or bid all goods and services under the bid threshold, whether exempt

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under PSCL or not. The federal rules do include provisions for procurement by “noncompetitive proposals,” but only under certain circumstances.

**Citation:** EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

**Required Action:** The school should review 34 CFR Part 80.36 and use open and competitive procedures where at all possible. The school should also analyze and include documentation in its files that demonstrates the school 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.

If you have any questions, please contact Anthony Hearn via phone at (609) 633-2492 or via email at [anthony.hearn@doe.state.nj.us](mailto:anthony.hearn@doe.state.nj.us).