



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

CHRIS CHRISTIE
Governor

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CHRISTOPHER D. CERF
Commissioner

June 7, 2013

Ms. Megan Lane, School Administrator
Paul Robeson Charter School for Humanities
643 Indiana Avenue
Trenton, NJ 08638

Dear Ms. Lane:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Paul Robeson Charter School for Humanities**. 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, 2012 through January 9, 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 Paul Robeson Charter School for Humanities 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 Lori Ramella at (609) 984--0937.

Sincerely,

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

RJC/LR/dk:Paul Robeson C.S. for Humanities Cover Letter/consolidated monitoring
Enclosures

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PAUL ROBESON CHARTER SCHOOL FOR HUMANITIES
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JUNE 2013**

District: Paul Robeson Charter School For Humanities
County: Mercer
Dates On-Site: January 9 and 10, 2013
Case #: CM-027-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 235,131
Title IIA	1,739
IDEA Basic	82,828
Race to the Top	24,369
Total Funds	<u>\$ 344,067</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, 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 Paul Robeson Charter School for Humanities 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; Title IIA; Race to the Top, and IDEA for the period July 1, 2012 through January 9, 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, Race to the Top, and IDEA from July 1, 2012 through January 9, 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, TITLE IIA, IDEA, AND RACE TO THE TOP FUNDS

Title I Projects

The school operates a Title I Schoolwide program. The school has identified English Language Arts and Mathematics for all students as its priority problems.

Title IIA Projects

The school is using its FY 2011-2012 funds to provide professional development for teachers. For FY 2012-2013, no funds have been spent as of the dates of the monitoring visit.

IDEA Projects (Special Education)

The school was awarded \$82,828 in Basic IDEA funds for the 2011-2012 school year. A total of \$20,036 was expended to support the salary of a special education teacher. In August 2012, the school applied and was approved to carry over \$61,867 in IDEA funds to the 2012-2013 school year. The school's FY 2012-2013 IDEA Basic funds will be used to support the salaries of related services providers and child study team members. Additionally, IDEA funds will also be used to purchase Easy IEP, an IEP program.

Race to the Top Projects

The school officials were not aware of the Race to the Top grant funds. They intend to meet with the Race to the Top Project Manager to discuss the grant and use of funds.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: On almost all occasions, the school failed to issue a purchase order prior to services being rendered (confirming order). State regulations require that a properly executed purchase order be issued prior to services being rendered. It is imperative that purchase orders are issued by the purchasing agent authorizing a purchase transaction with a vendor to provide or perform goods and services to the school in an effort to reduce duplication of goods and services, ultimately reducing the likelihood of overpayment to vendors.

Citation: N.J.S.A 18A:18A(2)(v) *Public School Contracts Law*.

Required Action: The school must implement a process to ensure that purchase orders are issued prior to receiving goods and services from vendors.

Finding 2: The school does not have the required supporting documents to verify the time and activity of Title I staff as required by federal law. The documentation must reflect what the staff

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is doing, when and where and must match their funded percentage. Employees salaries and wages that are paid in whole or part with federal funds must document his/her time spent working within the grant program to ensure that charges applied to the grant program reflects an accurate account of the employee's time and effort devoted to the grant program.

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 adjust the staff time and activity records to reflect the percentage of the staff members' salary that is funded by the grant for FY 2012-2013.

Finding 3: The school began to spend money on schoolwide expenditures prior to being granted schoolwide status. Prior to September 1, 2012, the school ran a Targeted Assistance Program. During that time, the school expended Title I funds for programs and services that either benefited non-Title I students or benefited the entire school. The school used Title I funds for the following unallowable expenditures:

- FedEx and Staples expenses for personal services, do not meet the intents and purposes of the Title I grant;
- Achievement Network, Graja Associates, and Stephen Feder expenses for student testing and data analysis; and
- Young Scholars Institute expenses for services offered to all students in the school.

Citation: ESEA §1120A (b) (1): *Federal Funds to Supplement, Not Supplant, Non-Federal Funds*.

Required Action: The nature of this finding has been referred to the Office of Fiscal Accountability and Compliance (OFAC) for further review.

Finding 4: The school could not provide evidence as to when it's Title I written parental involvement policy was distributed. The lack of evidence of the dissemination of this policy excludes parents from the opportunity for full participation in their child's educational program.

Citation: NCLB §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: For FY 2012-2013, the school must ensure that its Title I written parental involvement policy is distributed to all parents/guardians of school students. The school must provide documented evidence to the NJDOE for review.

Finding 5: The school could not provide evidence of having school-parent compacts. 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: NCLB §1118(d): *Parental Involvement (Shared Responsibilities for High Student Academic Achievement)*.

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Required Action: The Title I school-parent compact must be amended to reflect the legislative requirements. The compacts must include each of the following: the school, parent, and students will share in the responsibility for improved student academic achievement. The school must distribute the updated compact to the students and parents for FY 2012-2013 and send a copy of the school-parent compact to the NJDOE for review.

Finding 6: The school could not provide evidence of convening its Annual Title I parent meeting. The exclusion of parents in this meeting does not offer them the opportunity for full participation in their child's educational program.

Citation: NCLB §1118(c)(1): *Parental Involvement (Policy Involvement)* .

Required Action: The school must convene its FY 2012-2013 Annual Title I meeting for the parents/guardians and submit evidence of said meeting to the NJDOE for review (invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

Title IIA

Finding 7: The school provided professional development using Title IIA funds. However, the documentation necessary to verify the implementation of these funded professional development activities, such as agendas, sign in sheets, and staff rosters were not provided.

Citation: ESEA 2122: *Local Applications and Needs Assessment*.

Required Action: The school must provide documentation for all FY 2012 and planned FY 2013 Title IIA expenditures to the NJDOE for review.

IDEA

Finding 8: The school does not have the supporting documents to verify the activity of IDEA staff as required by federal law. The documentation must reflect what the staff is doing, when and where and must match their funded percentage.

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 activity of staff charged to the grant. The school must submit a list of FY 2012-2013 IDEA funded staff, salaries, funding percentages and time sheets to date to the NJDOE for review (including administrative staffing).

Finding 9: The school charged the incorrect fund account code for instructional salaries (241 versus 250-259 account code).

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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 improve internal controls and communication between the grants office and the program office when developing a budget and establishing accounts in the accounting system to ensure the proper description of activities for the grant.

Finding 10: The school did not have the required board approval identifying the personnel funded through the IDEA grant and the percentage of funding.

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 ensure that all staff members charged to the grant are approved in the board minutes. The school must submit a list of FY 2012-2013 funded staff, salaries, funding percentages and a sample time sheet to date to the NJDOE for review.

IDEA

Finding 11: The school's notices of reevaluation planning, eligibility and IEP meetings did not consistently inform the parent of all intended purposes of a meeting when a meeting was conducted for more than one purpose. Noncompliance was due to a lack of consistent implementation of school procedures.

Citation: *Provision and Content of Notice of a Meeting* N.J.A.C. 6A:14-2.3(k)3,5; 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 that contains all required components early enough to ensure a parent has an opportunity to attend. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of notices of reevaluation planning, eligibility and IEP meetings that occurred between April 2013 and July 2013.

Finding 12: The school did not provide copies of evaluation reports to parents at least 10 days prior to the determination of eligibility. Noncompliance was due to a lack of implementation of school procedures.

Citation: *Provision of Evaluation Reports to Parents* N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a).

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Required Action: The school must ensure the provision of copies of evaluation reports to parents not less than 10 days prior to the determination of eligibility. In order to demonstrate correction of noncompliance, the school must conduct training for the child study team members regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of the provision of evaluation reports to parents for eligibility meetings conducted between April 2013 and July 2013.

Finding 13: The school did not obtain parental consent to waive reevaluation prior to expiration of eligibility for students currently eligible for special education and related services. Noncompliance was due to lack of implementation of school procedures.

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

Required Action: The school must ensure written parental consent to waive reevaluation is obtained prior to the expiration of eligibility for students currently eligible for special education and related services. The school must also ensure written consent is maintained in the students' files. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members regarding the procedures for implementing the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of parental consent to waive reevaluation that was obtained between March 2013 and July 2013.

Finding 14: The school did not conduct a meeting within 20 calendar days of receipt of a written request for evaluation for a speech-language evaluation to determine if an evaluation was warranted. Noncompliance was due to a lack of implementation school procedures.

Citation: *Initial Evaluation Meeting Timelines and Participants* N.J.A.C. 6A:14-2.5(b)6; 3.3(e) and 3.6(b).

Required Action: The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for an evaluation. In order to demonstrate correction of noncompliance, the school must conduct training for the speech-language specialist regarding the school's procedures. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review files of students referred for speech-language services and the participant page from the resulting meetings conducted between April 2013 and July 2013.

Finding 15: The school did not consistently conduct vision/hearing screenings and health/medical summaries for every student referred to the child study team for evaluation. Noncompliance was due to a lack of consistent implementation of school procedures.

Citation: *Vision and Hearing Screenings and Health Summaries* N.J.A.C. 6A:14-3.4(j).

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Required Action: The school must ensure that 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 regarding the procedures for implementing the requirements in the citation listed above. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review files of students who were referred for an identification meeting between March 2013 and July 2013.

Finding 16: 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 for students referred for speech-language services. Noncompliance was due to a lack of consistent implementation of school procedures.

Citation: *Initial Evaluation: Functional Assessments* N.J.A.C. 6A:14-3.4(f)4(i-vi); 20 U.S.C. §1414(b)(4) and (5); and 34 CFR §300.306(c)(i).

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 speech-language specialists regarding the school's procedures for implementing the requirements in the citation listed above. In addition, to demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of functional assessments. For assistance with correction of noncompliance, the school is referred to the sample report form for speech-language evaluations which are located at www.state.nj.us/education/speced/forms.

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. Noncompliance was due to a lack of consistent implementation of school procedures.

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

Required Action: The school must ensure that a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a 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 regarding the procedures for implementing the requirements in the citation listed above. Additionally, to demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between March 2013 and July 2013.

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Administrative

Finding 18: The school does not have internal control policies and procedures to prevent coding errors from occurring.

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

Recommended Action: The school should develop a formal written policy regarding the coding of fund account codes.

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 Lori Ramella via phone at (609) 984-0937 or via email at lori.ramella@doe.state.nj.us.