



State of New Jersey

DEPARTMENT OF EDUCATION

PO BOX 500

TRENTON, NJ 08625-0500

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Commissioner

July 15, 2013

Mr. Harvin T. Dash, Principal/Executive Director
East Orange Community Charter School
99 Washington Street
East Orange, NJ 07017

Dear Mr. Dash:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the East Orange Community 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 March 31, 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 East Orange 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 Steven Hoffmann at (973) 621-2750.

Sincerely,

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

RJC/SH/dk:E.OrangeComm.CS School Cover Letter/consolidated monitoring
Enclosures

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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
JULY 2013**

District: East Orange Community Charter School
County: Essex
Dates On-Site: April 9 and 10, 2013
Case #: CM-051-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 365,240
IDEA Basic	121,443
Title IIA	28,548
Race to the Top	29,967
Total Funds	<u>\$ 545,198</u>

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BACKGROUND

The Elementary & Secondary Education Act (ESEA) and the Individuals with Disabilities Education 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 East Orange 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 following programs: Title I; Title IIA; IDEA Basic; and Race to the Top for the period from July 1, 2011 through March 31, 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, IDEA Basic and Race to the Top from July 1, 2011 through March 31, 2013. A sampling of purchase orders and/or salaries was taken from each program reviewed.

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GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA AND RACE TO THE TOP FUNDS

Title I Projects

Title I funds were used to support teacher salaries and benefits, purchased services, and supplies.

IDEA Projects (Special Education)

The school is utilizing their IDEA funds to provide inclusion instruction to students in need of special services within a normal classroom environment. In addition, the school is utilizing these funds to purchase handheld technological instruments/devices for students and teachers to reinforce daily classroom activities. This technology will include software for individual use on laptop computers in mobile units within inclusion classes.

Race to the Top

Race to the Top funds are being used for transition to the common core state standards and instructional improvement systems.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1:

Condition: The school provided limited evidence of an active Stakeholder Committee involved in the development of the Schoolwide Plan. There were sign-in-sheets, but no agendas or minutes provided. The school provided no evidence the stakeholders were consulted about changes being made to the plan. In addition, activities in the school's plan did not correspond with the activities for which the school is using its Title I funds. The dates reflected in the plan represented several years. It was hard to discern what is relevant to the current year, as it was evident the plan was not reviewed or updated for the current year. By admission, the school considers the Schoolwide Plan a living document and therefore, is constantly making revisions in isolation without stakeholder review or buy-in. The school is constantly implementing the new changes during the current year without NJDOE review or approval. The Schoolwide Plan is the mechanism for the school to document its efforts to meet the purposes and intents of the Title I legislation, and how the Title I funds will be used to support the program. Proposed changes to the Schoolwide Plan must be presented to the NJDOE for review and approval before being executed. Once the plan is approved, it must be implemented throughout the entire academic year and evaluated before the school considers revisions for the subsequent year.

Citation: ESEA §1114(b): *Schoolwide Programs: Components of a Schoolwide Program*; ESEA §1114(b)(2)(B)(ii): *Plan Development*.

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Required Action: For the 2013-2014 school year, the school will be designated as a Title I targeted assistance program, and may use Title I funds to provide supplemental instructional services to identified low-performing students. The school may reapply to operate a Title I schoolwide program in the 2014-2015 school year. During the 2013-2014 school year, the school must engage its Stakeholder Committee to conduct a comprehensive needs assessment, which will become the basis for the school's 2014-2015 Title I Schoolwide Plan. The school must add parent representatives to the Stakeholder Committee, who are not current member of the Board of Trustees. The school must document all stakeholder meetings with agendas, sign-in-sheets and approved minutes. Changes to the membership of the Stakeholder Committee must be documented in the minutes and noted on the sign-in-sheets.

Finding 2:

Condition: The school was unable to provide evidence that 100 percent of its teachers and paraprofessionals met the highly qualified teacher (HQT) requirement. The school did issue the required Parents Right to Know letter; however, the letter on the school's web page is dated June 4, 2012 and the hard copy presented is dated August 2012. The school did not issue the Parents Right to Know follow-up letter as required when a child has been assigned, or has been taught for four or more consecutive weeks by a teacher and/or paraprofessional who is not highly qualified as required by ESEA.

Citation: ESEA §1111(h)(6).

Required Action: For the 2013-2014 school year, the school must issue the Parents Right to Know letter at the beginning of the school year. The school must also issue the Parents Right to Know letter to parents of follow up with the of students currently being taught for four consecutive weeks by teacher(s)/paraprofessional(s) who do not meet the highly qualified requirement. This practice must be repeated in the future whenever this circumstance occurs regardless of the progression of the academic year.

Finding 3:

Condition: The school does not have a parental involvement program that reflects the requirements of the Title I legislation. For the 2012-2013 school year, the required parent meeting was not held until January 10, 2013, as evident by the documents presented. Additionally, there is no evidence the school's parental involvement policy and the school-parent compact were developed in conjunction with Title I parents/guardians. The exclusion of parents/guardians in the development of these documents does not offer them the opportunity for full participation in their child's educational program.

Citation: ESEA §1118(c)(1) and (2): *Parental Involvement*.

Required Action: The school must hold its annual parent meeting before November 1st each year. The school must provide evidence of inclusion of the associated stakeholder

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groups in the development of the parental involvement policy and school-parent compact. The school policy presented was last reviewed on April 22, 2008. The school must provide evidence of the involvement of parents and families in the development and annual review process. In addition, the policy must be reviewed annually by the Board of Trustees. The school must provide the NJDOE with evidence of the development of these documents with parents/guardians of the Title I students for the 2013-2014 school year, as well as evidence of Board of Trustees review. These documents are to be distributed to parents/guardians annually before or during the annual parent meeting. In addition, this collaboration must continue each year before the annual parental meeting with the necessary documentation (letters/flyers, dated agenda, dated sign-in-sheets and typed minutes) on file at the school.

Finding 4:

Condition: The school did not provide evidence of developing the required Title I School-Parent Compact. The ESEA requires all Title I schools to jointly develop a School-Parent Compact with parents/guardians of participating students. The parent compact must include a section on the schools/teachers responsibility to the student and family, the parent's responsibility, and an optional student's responsibility section. This document must be reviewed by a stakeholder committee and distributed annually.

Citation: ESEA §1118 *Parental Involvement*.

Required Action: The school must include the associated stakeholder groups in the development of the School-Parent Compact. This document must be finalized before the annual Parent Meeting and presented at that meeting. The school must provide evidence of the development, with parents/guardians of the Title I students, for the 2013-2014 school year to the NJDOE for review.

Finding 5:

Condition: The school did not provide information to parents/guardians in multiple languages. The school is required to provide information to parents/guardians of students participating in Title I, Part A programs in a language that is understandable and in a uniform format, including alternative formats upon request.

Citation: ESEA §1118(b)(1): *Parental Involvement*.

Required Action: The school must have all required documents translated into a language that is understandable to the parents/guardians of the students served. The documents that must be in multiple languages are, at a minimum, the District/School Parental Involvement Policy, School-Parent Compact and the Parents Right to Know Letter. The school must submit copies of these documents to the NJDOE for review before the beginning of the 2013-2014 school year.

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Finding 6:

Condition: The school's web page contains some of the required documents; however, the documents posted are not in multiple languages. The Parents Right to Know letter on the web page is dated June 4, 2012 and the hard copy presented is dated August 2012. The web page is missing the parental notification letter, which must be sent to parents/guardians of children being taught by teachers and/or paraprofessionals who have not met the HQT requirement. In addition, there was no evidence the letter was sent in 2012-2013.

Citation: ESEA §1111(h)(2)(E): *Public Dissemination*.

Required Action: The school must, at a minimum, review and update its parent involvement web page to include required notifications and documents annually to meet the ESEA broader dissemination requirement.

Title IIA

Finding 7:

Condition: The review of the FY 2011-2012 Title IIA expenditures revealed evidence the school incorrectly charged non-allowable activities (i.e., conference meetings with Title I staff, attending roundtable meeting, shopping for Title I annual meeting, etc.) as professional and technical services under the Title II Part A grant. Furthermore, the evidence showed a consultant as rendering the non-allowable activities.

Citation: NCLB 1112, 1119, 2122-2123.

Required Action: The school must show evidence that allowable activities under Title II Part A are consistent and focus on preparing, training, and recruiting high-quality teachers and principals. The school must ensure Title IIA resources are used to implement programs and activities that are aligned with statutory and regulatory requirements.

IDEA (Special Education)

Finding 8:

Condition: The school did not consistently provide notice of a meeting for identification, eligibility, and IEP meetings to parents of students referred and/or eligible for special education and related services and students referred and/or eligible for speech-language services. In addition, for students referred and/or eligible for speech-language services, the school's notices of meetings did not consistently include all required components.

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Citation: 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, in writing, that contains 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 speech-language specialists regarding the procedures for implementing the requirements in the citation listed on the previous page. The school must implement an oversight mechanism to regularly review the school's special education data system to ensure forms for provision of notice include required components. In addition, this oversight mechanism must include a review of dates of issuance of notice of a meeting to ensure each child study team member and speech-language specialist is providing notice of a meeting in sufficient time to ensure parent participation. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of the provision and content of notice of a meeting for meetings conducted between September 2013 and December 2013, and review the oversight procedures.

Finding 9:

Condition: The school did not consistently inform parents of proposed actions through provision of written notice for identification, initial eligibility, initial IEP, IEP, and reevaluation planning meetings for students referred and/or eligible for speech-language services. In addition, written notice of identification, eligibility, IEP, and reevaluation planning meetings did not consistently include all required components for students referred and/or eligible for speech-language services. The notice did not consistently include the short procedural safeguards statement and options considered and rejected.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a) and N.J.A.C. 6A:14-2.3(f) and 2.3(g)1-7.

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 citation listed above. The school must implement an oversight mechanism to regularly review the school's special education data system to ensure forms for provision of written notice include required components. In addition, this oversight mechanism must include a review of dates of issue of written notice of a meeting to ensure each child study team member and speech-language specialist is providing written notice within 15 days of the meeting. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of the provision and content of written notice for meetings conducted between September 2013 and December 2013 and review the oversight procedures.

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Finding 10:

Condition: The school did not consistently provide parents with copies of special education rules (N.J.A.C. 6A:14), and due process hearing rules (N.J.A.C. 6A:14-2.7) when a determination was made to conduct or not to conduct an initial evaluation for students referred for speech-language services.

Citation: 20 U.S.C. §1414(b)(1)(c)(4)(A); 34 CFR §300.304(a)(4); and 34 CFR §300.305(a) and N.J.A.C. 6A:14-2.3(i).

Required Action: The school must ensure parents are provided copies of special education rules and due process hearing rules when a determination is made to conduct or not to conduct an initial evaluation. 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 citation listed above. The school must implement an oversight mechanism to ensure parents are consistently provided copies of special education rules and due process hearing rules. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of the provision of the citations listed above at identification meetings conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 11:

Condition: The school did not consistently provide copies of evaluation reports to parents at least 10 days prior to the determination of initial eligibility or the determination of continued eligibility for students referred and/or eligible for special education and related services.

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

Required Action: The school must ensure parents are provided copies of evaluation reports not less than 10 days prior to the determination of eligibility. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members regarding procedures for implementing the requirements in the citation listed above. The school must implement an oversight mechanism to regularly review documentation of the school's provision of copies of evaluation reports to parents 10 days prior to eligibility meetings. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of evaluations conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 12:

Condition: The school did not consistently convene meetings with required participants for students referred and/or eligible for speech-language services.

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Citation: N.J.A.C. 6A:14-2.3(k)1(i-vii); 20 U.S.C. §1414(d)(1)(B); and 34 CFR §300.321(a).

Required Action: The school must ensure all 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 speech-language specialists regarding the procedures for implementing the requirements in the citation listed above. The school must implement an oversight mechanism to regularly review documentation of participants at meetings. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation from meetings conducted between September 2013 and December 2013 and to review the oversight procedures.

Finding 13:

Condition: The school did not consistently document in IEPs for students eligible for special education and related services or speech-language services, how each student with a disability will participate in school-wide assessments, general education assessments for the student's grade, or an alternate assessment. In addition, the school did not consistently document in IEPs for students eligible for speech-language services how each student with a disability will participate in statewide assessments and any appropriate accommodations and modifications.

Citation: N.J.A.C. 6A:14-3.7(e)7(i); 20 U.S.C. §1412(a)(16)(A); and 34 CFR §300.160(a) and (f).

Required Action: The school must ensure IEP documentation indicates how each student with a disability will participate in school-wide and state-wide assessments and that each IEP contains a statement of any individual modifications to be provided the student in the administration of those assessments as required to meet the students' needs. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and speech-language specialists regarding the procedures for implementing the requirements in the citations listed above. The school must implement an oversight mechanism to regularly review IEPs for consistent inclusion of documentation of participation in state-wide and school-wide assessments and any appropriate accommodations and modifications. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of participation in school and state-wide assessments for IEPs developed at meetings conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 14:

Condition: The school did not include required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services.

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The following considerations and required statements were missing or noncompliant in IEPs for students eligible for speech-language services:

- How the student's disability affects performance in the general curriculum;
- Strengths of the student;
- Other academic and functional needs of the student;
- Language needs of a student with limited English proficiency;
- Communication needs;
- For a student who is deaf or hard of hearing, opportunities for direct communication with peers and professional personnel;
- The need for assistive technology devices and services;
- Measurable goals and objectives, and a statement of how goals will be measured;
- Support for school personnel; and
- Consideration of Extended School Year and a description of the program when provided.

The following required components were missing or noncompliant in IEPs for students eligible for special education and related services:

- Measurable goals and objectives and a statement of how goals will be measured.

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 develop IEP documents that include all considerations and required statements. In addition, the school must ensure each student's IEP includes documentation of these considerations and required statements. In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and speech-language specialists regarding the procedures for implementing the requirements for the laws and regulations listed above. To demonstrate the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant. The school must also implement an oversight mechanism to regularly review IEPs for consistent inclusion of, and documentation of, considerations and required statements. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the revised IEPs, along with IEPs for students whose annual review meetings are conducted between September 2013 and December 2013, and to review the oversight procedures. Names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor.

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Finding 15:

Condition: The school did not conduct a meeting within 20 calendar days of receipt of a written request for evaluation for speech-language services to determine if an evaluation was warranted.

Citation: 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 evaluation and that required participants are in attendance. In order to demonstrate correction of noncompliance, the school must conduct training for speech-language specialists regarding the school's procedures. The school must implement an oversight mechanism to regularly review documentation regarding referrals and meeting dates. To demonstrate implementation of the procedures, a monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation from meetings conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 16:

Condition: 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 related services and for students referred for speech-language services.

Citation: N.J.A.C. 6A:14-3.4(f)4(i-vi); and (g)20U.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 all initial evaluations. 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 citations listed above. The school is referred to the sample report form for speech-language evaluations which is located at: www.state.nj.us/education/speced/forms. The school must implement an oversight mechanism to regularly review evaluation reports to verify all required sections of the functional assessment are conducted as a component of initial evaluations. The NJDOE will conduct an on-site visit to interview staff and review initial evaluation reports for students evaluated between September 2013 and December 2013, and to review the oversight procedures.

Finding 17:

Condition: 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.

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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 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 citations listed above. The school must implement an oversight mechanism to regularly review evaluations for the inclusion of an educational impact statement from the classroom teacher. Additionally, a monitor from the NJDOE will conduct an on-site visit to review initial evaluation reports for students referred for speech-language services whose eligibility meetings were held between September 2013 and December 2013, and to review the oversight procedures.

Finding 18:

Condition: The school did not consistently ensure students found eligible for speech-language services met the eligibility criteria.

Citation: N.J.A.C. 6A:14-3.6(b)1-3; 20 U.S.C. §1401(3); and 34 CFR §300.306(b).

Required Action: The school must ensure the criteria set forth in N.J.A.C. 6A:14-3.6(b) are used to determine eligibility for speech-language services. 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. The school must implement an oversight mechanism to regularly review eligibility documentation to ensure students found eligible for speech-language services meet the eligibility criteria. A monitor from the NJDOE will conduct an on-site visit to interview staff and review documentation of eligibility for eligibility meetings conducted between September 2013 and December 2013, and to review the oversight procedures.

Finding 19:

Condition: The school did not maintain documentation of the frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS) process.

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

Required Action: The school must ensure interventions are provided in the general education setting for students exhibiting academic and or behavioral difficulties prior to referring the student for an evaluation. In addition, the school must ensure when the I&RS team identifies interventions to meet the needs of a struggling learner, the team

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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 regarding the procedures for implementing the requirements in the citation listed above. The school must implement an oversight mechanism to regularly review documentation of the frequency, duration, and effectiveness of interventions provided in the general education setting. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview I&RS team members and teachers and review documentation for students who were provided interventions in the general education setting between September 2013 and December 2013, and to review the oversight procedures.

Finding 20:

Condition: The school does not have a policy for the participation of students with disabilities in school-wide assessments. An interview with school administration indicated that the school implements assessments to all students in grades K, 1 and 2.

Citation: 34 CFR §300.160.

Required Action: The school must revise its policies and procedures to ensure students with disabilities participate in school-wide assessments. The policy must include the provision of accommodations and modifications and the provision of alternate assessments for those children who cannot participate in the regular assessment. If the school reports publicly on the school-wide assessment, the school must also report with the same frequency and in the same detail as it reports on the assessment of non-disabled children. A monitor from the NJDOE will conduct an on-site visit to review this policy revision to ensure the policy meets the requirements set forth in the citation listed above.

Race to the Top

A review of the expenditures related to the Race to the Top grant yielded no findings.

Administrative

Finding 21:

Condition: The school does not comply with required timekeeping standards for federally funded grants. Employees with 100 percent of their salary paid with Title I funds must complete a semi-annual certification attesting to their performance of Title I related duties, and employees with less than 100 percent of their salary paid with Title I must complete monthly personal activity reports.

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

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Required Action: The school must ensure employees submit detailed personal activity reports that have been verified by supervisors, as required.

Finding 22:

Condition: On several occasions the school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). School policy and state regulations require that a properly executed purchase order be issued prior to the purchase of goods or the rendering of services.

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

Required Action: The school must institute the necessary internal controls to ensure purchase orders are issued to all vendors prior to goods or services being provided.

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 Steven Hoffmann via phone at (973) 621-2750 or via email at steven.hoffmann@doe.state.nj.us.