



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

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

DAVID C. HESPE  
Acting Commissioner

August 19, 2014

Mr. Chifonda Henry, School Administrator  
Knowledge A to Z Charter School  
1725 Park Boulevard  
Camden, NJ 08103

Dear Mr. Henry:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Knowledge A to Z 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, 2013 through May 22, 2014. 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 Knowledge A to Z 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:Knowledge A to Z Charter School Cover Letter/consolidated monitoring  
Enclosures

Distribution List

David Hesse  
Robert Bumpus  
Susan Martz  
Karen Campbell  
Peggy McDonald  
Kimberly Murray  
Anthony Hearn  
C. Ann Volk  
Stephen M. Eells

**STATE OF NEW JERSEY  
DEPARTMENT OF EDUCATION  
PO BOX 500  
TRENTON, NJ 08625-0500**

**KNOWLEDGE A TO Z CHARTER SCHOOL**  
1725 PARK BLVD.  
CAMDEN, NJ 08103  
PHONE: (856) 375-1140



*New Jersey K-12 Education*

**CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**District:** Knowledge A to Z Charter School  
**County:** Camden  
**Dates On-Site:** May 22 and 23, 2014  
**Case #:** CM-060-13

**FUNDING SOURCES**

	Program	Funding Award
Title I, Part A		\$ 260,051
IDEA Basic		253,863
IDEA Preschool		1,248
	Total Funds	<hr/> <hr/> <u>\$ 515,162</u>

**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**BACKGROUND**

The Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, 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 Knowledge A to Z 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) and IDEA Basic and Preschool for the period July 1, 2013 through May 22, 2014.

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 and IDEA Basic and Preschool from July 1, 2013 through May 22, 2014. A sampling of purchase orders and/or salaries was taken from each program reviewed.

**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

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

**Title I Projects**

The school used its FY 2013-2014 Title I funds to implement a targeted assistance program. Primarily, the school provides tutoring services through in-class support, pullout programs, and extended year programs. Prior year funds were spent on similar programs.

**IDEA Projects**

The FY 2013-2014 IDEA Basic and Preschool funds were used to purchase child study team services from Camden's Promise Charter School.

**DETAILED FINDINGS AND RECOMMENDATIONS**

**Title I**

**Finding 1:** The school had entrance and exit criteria for Title I student identification, but incorrectly included poverty measures (free and/or reduced lunch) as one of the entrance criteria. Title I schools must have multiple, educationally related, objective criteria to identify the low-performing students for supplemental services.

**Citation:** ESEA §1115: *Targeted Assistance Programs.*

**Required Action:** The school must remove poverty as one of its entrance criteria for Title I student identification. The school must submit the revised FY 2014-2015 entrance and exit criteria to the NJDOE for review.

**Finding 2:** The school did not provide evidence that the established entrance and exit criteria were consistently applied to determine Title I student eligibility. The monitors were unable to verify the process used to select and serve Title I students.

**Citation:** ESEA §1115: *Targeted Assistance Programs.*

**Required Action:** The school must establish a tracking mechanism for proper Title I student identification. This mechanism must include documentation of the use of multiple, educationally related, objective criteria to identify students for eligibility to receive Title I services.

**Finding 3:** The school's Title I parental notification letter did not include the multiple, educationally related, objective entrance and exit criteria used for Title I student identification, the remediation actions the school is using and the option for parents to opt-out of Title I services. This information is necessary for parents to understand the reasons their child was selected to participate in the Title I program, and what is needed for their child to exit the program.

**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**Citation:** ESEA §1115: *Targeted Assistance Schools*; ESEA §1118(c): *Parental Involvement (Policy Involvement)*.

**Required Action:** The school must revise its Title I participation letter to include the multiple, educationally related, objective criteria used to identify students for Title I services, and the criteria used to exit students from the Title I program. The school must provide a copy of its revised FY 2014-2015 Title I participation letter to the NJDOE for review.

**Finding 4:** The school did not provide evidence of convening its annual Title I parent meeting. Not conducting an annual meeting to explain the Title I legislation does not allow parents of identified Title I students to be informed and vested in the Title I program.

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

**Required Actions:** The school must convene the FY 2014-2015 annual Title I meeting for the parents/guardians of its identified Title I students in the beginning of the year. The school must submit evidence of convening this meeting to the NJDOE for review (invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

**Finding 5:** There was no evidence that the school's parental involvement policy was reviewed and board adopted for the 2013-2014 school year. The annual review and board adoption of the district/school-level Title I parental involvement policy provides families with the knowledge of the mechanisms the school has available for families to participate in their children's educational program.

**Citation:** ESEA §1118(a)(2): *Parental Involvement (Written Policy)*.

**Required Action:** Copies of a recent board approved school parental involvement policy must be submitted to the NJDOE for review.

**Finding 6:** The school did not provide information to parents in multiple languages. The school is required to provide information to parents of students participating in Title I 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 of the students served. The documents that must be in multiple languages are the District/School Parental Involvement Policy, Parent-School Compact and the Right to Know Letter, at a minimum. The school must submit copies of these documents to the NJDOE for review.

**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**Finding 7:** The school's use of Title I funds for Common Core, Terra Nova, 100 Book Challenge, mentoring and office supplies supplants state/local funds.

**Citation:** OMB Circular A-87, Attachment B, *Cost Principles for State, Local and Indian Tribal Governments*, ESEA Section 1120A(b) *Fiscal Requirements, Federal Funds To Supplement, Not Supplant, Non-federal Funds*.

**Required Action:** The school must reverse the expenditure of Title I funds for these activities and identify state/local funds to support the above mentioned programs. The school must send documentation of the adjusting journal entry to the NJDOE for review.

**IDEA Special Education**

**Finding 8:** 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 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 to ensure compliance with the requirements in the citation listed above. Additionally, a monitor from the NJDOE will conduct an on-site visit to interview staff, review evaluation reports for students referred for speech-language services whose eligibility meetings were held between November 2014 and January 2015, and to review the oversight procedures.

**Finding 9:** The school did not consistently document all required considerations and statements in each IEP. Specifically, IEPs developed for students eligible for special education and related services did not consistently include:

- method(s) of evaluating progress on related service goals and objectives;
- location of the provision of related services and how the related services will be delivered; and
- criteria used to determine if the student achieved the related service goal.

In addition, IEPs for students eligible for speech-language services did not include:

- participation in statewide assessment;
- location of the provision of speech services and how the services will be delivered; and
- method(s) of evaluating progress on speech-language service goals and objectives.

**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**Citation:** N.J.A.C. 6A:14-3.7(c)1-11, (e) 1-17, and (f); N.J.A.C. 6A:14-4.10(a); 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 all required components. 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 conduct annual review meetings and revise the IEPs for specific students whose IEPs were identified as noncompliant. A monitor from NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, along with IEPs for students whose annual review meetings were conducted between November 2014 and January 2015, and to review the oversight procedures. The names of the students whose IEPs were identified as noncompliant will be provided to the school by the monitor.

**Finding 10:** The school did not consistently provide parents notice of a meeting for students referred and/or eligible for speech-language services.

**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 provide parents notice of a meeting in writing early enough to ensure they have an opportunity to attend. 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 copies of notices of meetings conducted between November 2014 and January 2015, and to review the oversight procedures.

**Finding 11:** The school did not consistently provide parents written notice that contains all required components, within 15 calendar days following eligibility and reevaluation planning meetings for students eligible for special education and related services and for students eligible for speech-language services.

**Citation:** P20 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 that 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 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 written notice provided to parents following meetings conducted between November 2014 and January 2015, and to review the oversight procedures.



**KNOWLEDGE A TO Z CHARTER SCHOOL  
CONSOLIDATED MONITORING REPORT  
AUGUST 2014**

**Administrative**

**Finding 12:** The school was unable to provide evidence of competitively contracting for the provision of goods and services by vendors. In accordance with the Public School Contracts Law (PSCL) [N.J.S.A. 18A:18A:10(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 and charter schools 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 and charter schools to competitively contract or bid all goods and services under the bid threshold, whether exempt under PSCL or not. The federal rules do include provisions for procurement by “noncompetitive proposals,” but only under certain circumstances.

**Citation:** 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) .