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**KIPP: Cooper Norcross – Camden**

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*New Jersey K to 12 Education*

Collaborative Monitoring Report  
February 2021

**District:** KIPP: Cooper Norcross - Camden  
**County:** Camden  
**Dates Monitored:** January 5 and 6, 2021  
**Case #:** CM-02-21

**Funding Sources**

Program	Funding Award
Title I, Part A	\$ 1,603,616
ESSER	1,093,566
Title III	45,883
IDEA Basic	323,274
IDEA Preschool	7,984
Total Funds	<u><u>\$3,074,323</u></u>

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## **Background**

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The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to schools within their local jurisdiction. The provision of these programs and services is based on the requirements as specified in each of the pertinent authorizing statutes [ESSA, IDEA or other federal law(s)].

The laws further require that state education agencies, in this case, the New Jersey Department of Education (NJDOE) to monitor the implementation and execution of federal programs by the sub recipients. The monitors thereby determine whether the funds are being properly used by the school for their intended purposes and achieving the overall objectives of the funding initiatives.

## **Introduction**

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The NJDOE visited the KIPP: Cooper Norcross - Camden (school) to monitor the school's use of federal funds. It also monitors related program plans, as applicable, to determine whether the school's programs are meeting the intended purposes and objectives, as specified in the current year's applications and authorizing statutes.

The goal of the monitoring is to determine whether the funds were spent in accordance with the program's requirements, federal and state law and applicable regulations.

The on-site visit included: staff interviews and document and documentation reviews related to the requirements of the following programs: Title I, Part A (Title I), Title III, Elementary & Secondary School Emergency Relief fund (ESSER) and IDEA Basic and Preschool for the period July 1, 2020 through November 30, 2020.

The scope of work performed included the review of documents and documentation which included:

- accounting records
- annual audits
- board minutes
- current school policies and procedures
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders
- student records

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The scope of work performed also included:

- classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEPs)
- interviews of child study team members and speech-language specialists
- interview of the program administrator regarding the IDEA grant

### **Expenditures Reviewed**

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The grants reviewed included Title I, ESSER, Title III, and IDEA Basic and Preschool from July 1, 2020 through November 30, 2020. A sampling of purchase orders and/or salaries was taken from each program reviewed.

### **General School Overview of Uses of Federal Funds**

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#### **Title I Projects**

The school serves grades K–9 and operates a Title I schoolwide program. During the 2020-2021 school year, the district transferred 100 % of its Title II, Part A and Title IV, Part A allocations to Title I, Part A. This action increased the total Title I, Part A funding amount to \$1,535,622 (original allocation was \$1,322,253). The school programmed and budgeted its entire Title I, Part A allocation solely for the salaries and benefits of the following identified positions:

- Secondary teachers, co-teachers, principals in residence, teachers in residence, and assistant school leaders under the In-Class Support allowable use category;
- School office manager under the Parent and Family Engagement allowable use category;
- School counselor under the College and Career Readiness allowable use category; and
- Social workers, school guidance counselor, and homeless services under the Other allowable use category.

Since FY 2018, the school’s ESEA applications detail the transfer of approximately 100% of Title II, Part A and Title IV, Part A allocations into Title I, Part A, to be used solely for salaries and benefits, with little to no funding being utilized for enhanced, extended, or new academic and/or non-academic programs and services for students and/or parents and families.

It is important to note the purpose of the Title I, Part A grant program is to provide all children “significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps” so they can meet the challenging state academic standards. [ESEA §1001, 20 U.S.C. 6301] The purpose of a Title I, Part A schoolwide program is to serve as a comprehensive reform strategy designed to utilize Title I, Part A funds to upgrade the entire educational program of each schoolwide school by focusing programs and services on the lowest-performing students. [ESEA §1114(a)(1), 20 U.S.C. 6314] Given these program purposes, supplemental Title I, Part A funds must be used to:

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- Enhance existing programs/services and/or extend programs/services through the use of evidence-based interventions and strategies to improve student outcomes, including academic achievement, not just serve as a source of funding for the salaries of administrator and staff positions within the district.

A review of data from the school's performance reports for the last three years (e.g., FY 2017, FY 2018, and FY 2019) gleaned the following information:

- The school did not meet the ELA proficiency rate for federal accountability in FY 2018 and FY 2019 and did not meet the mathematics proficiency rate for federal accountability in FY 2019.
- For both ELA and math, the school was well below the state proficiency rate for federal accountability in both fiscal years (2018 and 2019).
- The school did not meet overall ELA and mathematics participation and performance targets in FY 2018 and FY 2019.
- The school did not meet overall Visual and Performing Arts participation targets and performance in FY 2018 and FY 2019.
- The school experienced an increase in chronic absenteeism for both FY 2018 and FY 2019. Currently, 31% of the total student population experiences chronic absenteeism, which was confirmed during interviews with school staff.

**Recommended Actions:**

Given the above-mentioned Title I, Part A program purposes, as well as the school's performance data, it is recommended that the school establish policies and procedures to ensure an active engagement of all relevant stakeholders in the required comprehensive needs assessment (CNA) process (to include parents and other community members).

Since the CNA serves as the basis for determining whether all programs and services, along with associated budgeted costs, are necessary, reasonable, and allocable, it is recommended the school focus efforts to collect and thoroughly analyze both quantitative and qualitative data to better describe root causes and more readily identify and articulate the specific needs for the school's students, staff, and parents/families. By engaging in an ongoing, annual comprehensive needs assessment process with the involvement of all relevant stakeholders, the school will create an opportunity to expand the ways in which it utilizes Title I, Part A funds (as well as all other ESEA title awards) beyond simply using these funds solely for salaries and benefits of administrators and staff members. This will allow the school to focus federal funding on the specific needs of historically underserved populations, implement rigorous evidence-based intervention models, and provide students the diverse, enriched, and accelerated curriculum and learning experiences necessary for a well-rounded education.

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**Title III Projects**

During the 2020-2021 school year, the school programmed and budgeted its Title III allocation for the following activities:

- Salaries
- Professional Development
- Parent and Family Engagement
- Instructional Materials/Supplies

**IDEA Grant**

The FY 2021 IDEA Basic funds are used to pay teaching assistants providing support services to students eligible for special education and related services.

**ESSER**

To date, ESSER funds have been expended for salaries of additional custodial workers.

**Detailed Findings and Recommendations**

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**Title I**

**Finding 1:**

The school did not provide dated evidence to document it held the required Annual Title I Meeting for parents and families of participating children. This lack of documents included:

- invitational letter/flyer
- meeting agenda
- meeting minutes
- sign-in sheet

Per the ESEA legislation, a Title I-funded school must convene an annual meeting at the beginning of the school year, to inform parents and families of the school's Title I, Part A program(s), the Title I, Part A legislative requirements, and the ways in which parents and families can be engaged actively in helping their children succeed academically.

**Citation:**

ESEA §1116(c) *Parent and Family Engagement: Policy Involvement*

**Required Action:**

The school must submit the following documentation as evidence of its FY 2021 Annual Title I meeting to the Office of Supplemental Educational Programs for review:

- invitational letter/flyer
- meeting minutes
- meeting agenda

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- sign-in sheets or a list of staff and parents who attended the meeting

Each piece of documentation must include the exact date on which the school held the required FY 2021 Annual Title I Meeting.

**Recommended Action:**

To further enhance knowledge regarding meaningful and timely parent and family engagement, it is recommended that the school administrators and staff review the parent and family engagement resources available on the NJDOE website at [Title I, Part A Parent Family Engagement](#). For additional assistance, please contact the Office of Supplemental Educational Services at [titleone@doe.nj.gov](mailto:titleone@doe.nj.gov).

**Finding 2:**

Although the school provided evidence of its school-school level parent and family engagement policy for the FY 2021 ESEA project period this policy did not contain the date on which the policy was instituted. In addition, the documentation lacked the following information:

- The exact date on which the school’s Board of Education approved the policy
- The exact date(s) on which the policy was widely distributed to parents and families
- The method(s) by which the policy was widely distributed to parents and families
- How the school actively engaged parents and families in the development of the school-school level parent and family engagement policy

Per ESEA legislation parents and families must be involved in the development of the written school-school level parent and family engagement policy, as well as be informed of ways they can further participate in the academic performance and achievement of their children.

**Citation:**

ESEA §1116 (a)(2): *Local Educational Agency Policy: Written Policy*; ESEA §1116(b)(1): *School Parent and Family Engagement Policy*

**Required Action:**

The school must submit the following documented evidence to the Office of Supplemental Educational Programs for review:

- The dated school-school level parent and family engagement policy that certifies the date on which the policy was instituted
- Information certifying the exact date(s) on which the policy was widely distributed to parents and families
- Information certifying the method(s) by which the school-school level parent and family engagement policy was widely distributed through various venues to parents and families (i.e., posted to school’s website, contained in student handbook, etc.)
- Information detailing the ways in which the school will actively engage parents and families in the ongoing monitoring and implementation of its school-school level parent and family engagement policy

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**Finding 3:**

The school did not provide documented evidence of the inclusion of parents and families in the development of its school-parent compact. In addition, the school did not provide documented evidence of how the school-parent compact was widely distributed to parents and families. Per ESEA legislation, the school-parent compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the challenging state academic standards. The exclusion of parents and families in the development of the school-parent compact resulted in these stakeholders being excluded from active participation in their children's educational programs.

**Citation:**

ESEA §1116(d)(2): *Parent and Family Engagement (Shared responsibilities for High Student Academic Achievement)*.

**Required Action:**

During the remainder of the FY 2021 ESEA project period, as well as all subsequent ESEA project periods, the school must include parents and families in the ongoing monitoring and continued development and implementation of all elements of the written school-parent compact. The school must submit documented evidence of the ways in which it will actively involve parents and families in the ongoing monitoring and continued development and implementation of all elements of the written school-parent compact. This documentation must be submitted to the Office of Supplemental Educational Programs for review.

**Finding 4:**

The school provided evidence of the required Parent Right-to-Know letter; however, this letter was not dated. In addition, the school did not provide evidence of the letter's distribution to all parents and families.

**Citation:**

ESEA §1112(e)(1): *Parents Right to Know – Information for Parents*

**Required Action:**

The school must revise its Parent Right-to-Know letter to include a specified date and re-distribute this letter on school letterhead to all parents and families. Additionally, the school must submit documented evidence of this revised Parent Right-to-Know letter and its distribution to parents and families to the Office of Supplemental Educational Programs for review.

**Finding 5:**

The school provided evidence of its parent notification letter to parents and families of English learners; however, this letter was not dated. In addition, the school did not provide evidence of the letter's distribution to all parents and families of English learners. Per ESEA legislation local educational agencies using Title I or Title III funds have to provide a language instruction educational program as determined under Title III shall, not later than thirty (30) days after the

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beginning of the school year, inform parents and families of an English learner identified for participation or participating in such program of specific requirements.

**Citation:**

*ESEA §1112(e)(3): Parents Right to Know – Language Instruction*

**Required Action:**

The school must revise its Parents Right-to-Know letter for Language Instruction to include a date, as well as re-distribute this letter to all parents and families. The school must submit documented evidence of the revised Parents Right-to-Know letter and the methods of distribution to parents and families of English learners to the Office of Supplemental Educational Programs for review.

**Finding 6:**

Although the school provided evidence of school-level policies and procedures regarding the Educational Stability of Children in Foster Care, these policies and procedures were not dated. In addition, the school did not provide evidence that verified its Board of Education approved these policies and procedures by December 10, 2016, as required by ESEA legislation.

**Citation:**

*ESEA §1111; §1112 Educational Stability for Children in Foster Care*

**Required Action:**

The school must update its school-level policies and procedures regarding the Educational Stability of Children in Foster Care. This update is to include the date of adoption and submit this information to the Office of Supplemental Educational Programs for review. In addition, the school must submit documented evidence of the meeting at which its Board of Education adopted these policies and procedures to the Office of Supplemental Educational Programs for review.

**Recommended Action:**

The school is encouraged to access the NJDOE website [Educational Stability for Children in Foster Care](#) for specific information regarding the establishment of its Educational Stability policies and procedures and turnkey this information with all staff members.

**Finding 7:**

The school did not provide documented evidence that the development of its Annual School Plan (ASP) involved the participation of parents and families, as well as community representatives as stakeholders on its ASP planning team. Per ESEA legislation, all relevant stakeholders, including parents and families, as well as other members of the community, must actively participate in the development, implementation, and evaluation of the school's ASP.

**Citation:**

*ESEA §1114(b)(2) Schoolwide Program Plan*



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**Required Action:**

As the school continues to implement and monitor its Annual School Plan (ASP) throughout the remainder of the FY 2021 ESEA project period, parents and families and other community members must be included as active participants in the ASP planning team meetings. The school must submit evidence of the active participation of parents and families, as well as other community members on its ASP planning team to the Office of Supplemental Educational Programs for review.

**Recommended Action:**

It is recommended school administrators review information regarding the effective and efficient use of Title I, Part A funds in a Title I schoolwide program at [Leveraging Federal Funds in a Schoolwide Program \(USED\)](#), and turnkey this information with all members of the ASP schoolwide planning team, as well as school staff.

**Finding 8:**

The school did not provide documented evidence that it conducted a comprehensive needs assessment (CNA) as part of the development of its Annual School Plan (ASP). The CNA did not identify target populations, specific causes of needs based on data analysis, specific school performance targets, or prior year outcomes. Rather, the CNA seemed to repeat many of the same elements that had appeared in the CNAs in school ESEA applications from the last several years, with no direct connection to data analysis. Per the ESEA legislation, the comprehensive needs assessment must be an ongoing process, to include, on an annual basis, the analysis of quantitative and qualitative data to determine specific identified needs for which Title I, Part A funds will be utilized.

**Citation:**

ESEA §1114(b)(6) *Schoolwide Program Plan*

**Required Action:**

Since the CNA is an ongoing process, not a one-time event, the school must institute processes to ensure its annual comprehensive needs assessment includes a thorough analysis of both quantitative and qualitative data that results in the identification of specific needs for students, staff, and/or parents and families. The school must submit evidence of established processes to ensure the CNA includes a thorough analysis of both quantitative and qualitative data in order to identify specific needs for students, staff, and/or parents and families.

**Recommended Action:**

It is important to note that the comprehensive needs assessment serves as the basis for which all budgeted costs are determined to be necessary, reasonable, and allocable to the Title I, Part A grant program (as well as to all other ESEA title programs). Consequently, it is recommended the school institute the following steps for the development of a more robust annual CNA that more clearly articulates the identified needs not only for the FY 2021 ESEA project period, but also for all subsequent ESEA project periods:

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- Assign specific staff to coordinate the development, implementation, and ongoing monitoring of the CNA
- Include more specific and quantifiable details for each identified need (e.g., target populations, grade levels, performance targets, academic and non-academic outcomes, evaluation of prior year outcomes, etc.)
- Ensure the active engagement of parents and families, as well as other community members in the development, implementation, and ongoing monitoring of the CNA.
- Incorporate a formal evaluation process as part of the CNA to strengthen the progress monitoring elements required to be part of the Annual School Plan (ASP)

**Finding 9:**

The school did not provide evidence that the total budget in the ASP was at the same level as the school's total Title I budget as articulated in the school's FY 2021 ESEA Application.

**Citation:**

ESEA §1114(b) *Schoolwide Program Plan*; 2 CFR §200.404 *Cost Principles: Subpart E (Compensation – personal services)*

**Required Action:**

The school must revise its ASP to ensure the budget contained within this plan aligns to the Title I, Part A budget contained in the school's FY 2021 ESEA Amendment Application (e.g., total budgeted amount of Title I, Part A funds in the ASP equals total budgeted amount of Title I, Part A funds in the ESEA Application). The school must submit verification that it revised its ASP budget to be in alignment with the Title I budget in its FY 2021 ESEA Application. This verification evidence must be submitted to the Office of Supplemental Educational Programs for review.

**Finding 10:**

The school did not provide the required time and activity reports or master work schedules for each funded position. In addition, the school did not provide documented evidence of job descriptions to detail the specific duties of each position type being funded with Title I, Part A monies.

In conversations with school staff during the monitoring, as well as a review of the school's FY 2021 ESEA Application and ASP, the following position types were identified:

- Principal in Residence
- Assistant School Leader in Residence
- Assistant School Leader
- Teacher in Residence
- Secondary Teacher
- Co-Teacher
- School Office Manager
- School Counselor
- Guidance Counselor

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Without time and activity reports, job descriptions and master work schedules, it was impossible to determine whether these funded positions were allowable under the Title I, Part A grant program (i.e., provided enhanced, expanded, and/or new instructional services, beyond just standard core instructional services).

**Citation:**

2 CFR §200.404 *Cost Principles: Subpart E (Compensation – personal services)*

**Required Action:**

The school must submit evidence to clarify whether it is using Title I, Part A funds for the nine (9) position types noted in this finding. This evidence includes the submission of the job descriptions for each Title I-funded position. In addition, the school must submit all applicable time and activity reports for each Title I-funded position, to reflect the actual time allotted to Title I activities, per position, as well as include staff members' and supervisors' signatures. This evidence must be submitted to the Office of Supplemental Educational Programs for review.

**Recommended Action:**

It is recommended that the school institute policies and procedures to ensure both program and fiscal staff work collaboratively, to establish a mechanism so that all Title I, Part A budgeted salary costs accurately reflect the total number of Title I-funded staff members in the FY 2021 ESEA Consolidated Subgrant Applications. This would also apply to all future ESEA Consolidated Subgrant Applications.

It is recommended the school institute policies and procedures to ensure all Board minutes clearly delineate the names and position titles of all staff members whose salaries and benefits are funded with Title I, Part A monies.

It is recommended the school institute policies and procedures to ensure all time and activity reports are completed accurately and in a timely manner.

**Title III**

**Finding 1:**

The school supplanted other funding sources when it used 2020-2021 Title III funds for the following: funding a portion of an English as a Second Language (ESL) teacher's salary.

**Citation:**

*ESEA §3115*

**Required Action:**

The school must reverse the charges in the amount of \$29,323 and \$11,729 from FY 2020-2021 and submit documentation of the adjusting entry to the NJDOE for review.

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**IDEA Program**

**Finding 1:**

The school did not consistently provide parents of students referred and/or eligible for special education and related services and students referred and/or eligible for speech-language services notice of a meeting for identification, eligibility, reevaluation planning, redetermination of eligibility and annual review meetings.

**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 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 a site visit to:

- interview staff;
- review copies of notices of meetings for meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 2:**

The school did not consistently provide parents written notice that contains all required components, within 15 calendar days following identification, eligibility, reevaluation planning, redetermination of eligibility and annual review meetings for students referred and/or eligible for special education and related services and for students referred and/or eligible for speech-language services.

**Citation:**

N.J.A.C. 6A:14(h)1, 2

**Required Action:**

The school must provide parents written notice at least 15 calendar days prior to the implementation of a proposed action so the parent may consider the proposal. 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.

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A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review copies of written notice for meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 3:**

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

**Citation:**

N.J.A.C. 6A:14-2.3(k)1(i-vii), 2(i-x); 3.3(e); 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 documentation of participation is maintained in students' records. 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 a site visit to:

- interview staff;
- review meeting documentation, including the sign in sheets, for meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 4:**

The school did not consistently conduct identification meetings within 20 calendar days of receipt of a written request for evaluation for special education and related services to determine if an evaluation was warranted.

**Citation:**

N.J.A.C. 6A:14-2.5(b)6; 3.3(e).

**Required Actions:**

The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation. 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.

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A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review documentation from identification meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 5:**

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 a site visit to:

- interview staff;
- review initial evaluation reports for students referred for speech-language services between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 6:**

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. Initial evaluation reports did not contain:

- observations in non-testing setting;
- parent interview; and
- teacher interview(s)

**Citation:**

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 all initial evaluations. 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

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above. The school is referred to the sample report form for speech-language evaluations which is located on the “[Special Education Forms](#)” webpage.

Monitors from the NJDOE will conduct a site visit to:

- interview staff;
- review initial evaluation reports for students evaluated between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 7:**

The school did not consistently document all required considerations and statements in the Individualized Education Programs (IEPs) of students eligible for special education and related services and speech-language services.

IEPs developed did not consistently include:

- documentation related to measurable goals and objectives including those for science and social studies; and
- document in the IEPs of students eligible for special education and related services the relevant factors considered determining whether a student requires an extended school year program (ESY).

**Citation:**

N.J.A.C. 6A:14-3.7(e) 1-17, and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

**Required Action:**

The school must ensure each IEP contains the required considerations and statements.

In order to demonstrate correction of noncompliance, the school must:

- conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above
- to demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise IEPs for specific students who IEPs were identified as noncompliant

A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review the revised IEPs;
- review a sample of IEPs for students whose annual review meetings were conducted between June 2021 and September 2021; and

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- review the oversight procedures.

Names of the students whose IEPs were identified as noncompliant will be provided to the school by the special education monitor. For assistance with correction of noncompliance, the school is referred to the state IEP sample forms which are located on the [Special Education Forms](#) webpage.

**Finding 8:**

The school did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings, consideration of placement in the least restrictive environment. Specifically, IEPs did not consistently include:

- supplementary aids and services considered and an explanation of why they are not appropriate
- comparison of the benefits provided in the general education class and the benefits provided in the special education class
- the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class
- for students in separate settings, the school activities necessary to transition the student to a less restrictive environment

**Citation:**

N.J.A.C. 6A:14-4.2 (a)4,8(iii) and 3.7(k)

**Required Action:**

The school must ensure each IEP contains the required considerations and statements.

In order to demonstrate correction of noncompliance, the school must:

- conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation(s) listed above
- to demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant.

A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review the revised IEPs;
- review a random sample of IEPs developed at meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.



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Names of the students whose IEPs were identified as noncompliant will be provided to the school by the special education monitor. For assistance with correction of non-compliance, the school is referred to the state IEP sample forms which are located at: [www.state.nj.us/education/speced/forms](http://www.state.nj.us/education/speced/forms).

**Finding 9:**

The school did not consistently document in the IEP all required age 14 transition components. Specifically, IEPs did not consistently include:

- student interests, preference and strengths; and
- identification of the staff member(s) responsible to serve as the liaison to post-secondary resources and make referrals to the resources as appropriate.

**Citation:**

N.J.A.C. 6A:14-3.7(e)11(i),13.

**Required Action:**

The school must ensure the IEP contains the required considerations and statements. In order to demonstrate correction of noncompliance, the school must:

- conduct training for child study team members
- develop an oversight mechanism to ensure compliance with the requirements in the citation listed above
- to demonstrate that the school has corrected the individual instances of noncompliance, the school must conduct annual review meetings and revise the IEPs for specific students with IEPs that were identified as noncompliant

A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review the revised IEPs;
- review a random sample of IEPs developed at meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

Names of the students whose IEPs were identified as noncompliant will be provided to the school by the special education monitor. For assistance with correction of noncompliance the school is referred to the state IEP sample forms which are located at: <https://www.nj.gov/education/specialed/form/>.

**KIPP: Cooper Norcross - Camden  
Collaborative Monitoring Report  
February 2021**

**Finding 10:**

The school did not consistently obtain written parental consent prior to conducting any assessment as part of the initial evaluation for students referred for special education and related services.

**Citation:**

N.J.A.C. 6A:14-2.3(a)1

**Required Action:**

The school must ensure that written parental consent is obtained prior to conducting any assessment as part of the initial evaluation for students referred for special education and related services. Documentation of parental written consent must be maintained in the student's file.

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.

Monitors from the NJDOE will conduct a site visit to:

- interview staff;
- review initial documentation for students evaluated between June 2021 and September 2021; and
- review the oversight procedures.

**Finding 11:**

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

**Citation:**

N.J.A.C. 6A:14-2.3(k)2x and 3.7(e)13, 3.7(h); 20 U.S.C. §1414 (d)(1)(A)(i)(1)(VIII); and 34 CFR §300.322.b(2)

**Required Action:**

The school must ensure that each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed.

In order to demonstrate correction of noncompliance, the school must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above.

A monitor from the NJDOE will conduct a site visit to:

- interview staff;
- review copies of invitations to IEP meetings to students age 14 and above for meetings conducted between June 2021 and September 2021; and
- review the oversight procedures.

**KIPP: Cooper Norcross - Camden  
Collaborative Monitoring Report  
February 2021**

**Administrative**

**Finding 1:**

The amounts appropriated for several federal grants in the school's accounting records could not be reconciled with corresponding amounts awarded in the Electronic Web Enabled Grant system (EWEG).

**Citation:**

Uniform Grant Guidance 2 C.F.R. 200.300

**Required Action:**

The school must implement a process to ensure that amounts awarded through a grant are recorded appropriately in the financial records.

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 (609) 376-3593 or via email at [steven.hoffmann@doe.nj.gov](mailto:steven.hoffmann@doe.nj.gov).

KCNA-034-21

**KIPP: COOPER NORCROSS**

740 Chestnut Street  
Camden, NJ 08103  
(856) 409-0493 - Phone  
(973) 622-1563 - Fax

**RESOLUTION**

**Adopting Collaborative Monitoring Corrective Action Plan**

**WHEREAS**, in January, 2021, KCNA underwent a Collaborative Monitoring by the NJ Department of Education of all its federal programs; and,

**WHEREAS**, the State recommended that KCNA take certain actions to ensure that it meets the requirements for use of its federal funds; and,

**WHEREAS**, the findings and recommendations were openly discussed at a public meeting; and,

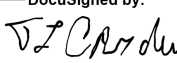
**WHEREAS**, KCNA is committed to providing the best educational experience to its students and will implement the State's recommendations,

**NOW, THEREFORE, BE IT RESOLVED** that the KCNA Board of Trustees adopts the attached Corrective Action Plan.

**DATE:**

4/14/2021

**SIGNED BY:**

DocuSigned by:  


CC258E41327443A

**Timothy Carden, President**  
**Board of Trustees**

**Adopted at the Board of Trustees Meeting on**

**April 12, 2021**

**NEW JERSEY DEPARTMENT OF EDUCATION  
OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE  
CORRECTIVE ACTION PLAN**

SCHOOL DISTRICT NAME: KIPP COOPER NORCROSS

COUNTY: CAMDEN

TYPE OF EXAMINATION: COLLABORATIVE MONITORING

DATE OF BOARD MEETING: APRIL 12, 2021

CONTACT PERSON: RANJANA REDDY, MANAGING DIRECTOR OF OPERATIONS

TELEPHONE NUMBER: (856) 966-9600

EMAIL: RREDDY@KIPPNJ.ORG

<b>RECOMMEN DATION NUMBER</b>	<b>CORRECTIVE ACTION</b>	<b>METHOD OF IMPLEMENTATION</b>	<b>INDIVIDUAL RESPONSIBLE FOR IMPLEMENTATION</b>	<b>COMPLETION DATE OF IMPLEMENTATION</b>
<b>Title 1</b>				
1	School must submit documentation from FY21 Annual Title I Families meeting.	FY21's Title I Annual meeting was held via webinar due to the pandemic. The school will submit to OSEP the FY21	Ranjana Reddy	October 31, 2021

		<p>digital sign-in log. It was announced via email to families. There were no flyers, agendas, or minutes.</p> <p>FY22's Title I Annual Meeting will be held in-person at the beginning of the 2021-22 school year. KIPP will submit flyers, minutes, agenda, and sign-in sheets for FY22 to OSEP.</p>		
2	School must provide evidence of compliant parent and family engagement policy.	<p>School board approved FY21 policy on 6/15/2020. School will provide a copy of the board resolution with the date to OSEP. Since school has been remote the entire year copies were provided to families via email link and posted on the website. School will redistribute paper copies to families when in-person learning resumes in April. The school will hold meetings with families beginning in April 2021 to engage families in ongoing monitoring and implementation of policy. School will provide information certifying the</p>	Ranjana Reddy	May 15, 2021

		same		
3	School must actively involve parents/families in the development of a school-parent compact.	School has started a series of parent/family/community meetings in the next few months to discuss the school-parent compact. The next meeting will be held in April, 2021. School will submit evidence to OSEP.	Ranjana Reddy	June 30, 2021
4	School must revise its Right to Know letter to include a date and will re-distribute to families	Since school has been remote the entire year copies were provided to families via email link and posted on the website. School will revise its Right to Know letter to include a date and will re-distribute to families when in-person instruction returns in April 2021. School will provide evidence to OSEP of redistribution.	Ranjana Reddy	May 15, 2021
5	School must revise its Right to Know for Language Instruction letter to include a date and will re-distribute to families.	School will revise its Right to Know for Language Instruction letter to include a date and will re-distribute to families when in-person instruction returns in April 2021. School will provide evidence to OSEP of redistribution.	Ranjana Reddy	May 15, 2021
6	School must provide evidence of board approval date for	School will provide board resolution and date of	Ranjana Reddy	May 15, 2021

	Educational Stability of Children in Foster Care policy and procedure.	adoption to OSEP.		
7	School must include parents and families and other community members in its ASP planning team meetings.	School is holding a series of parent/family/community meetings over the next few months to discuss the development of ASP. School will submit evidence to OSEP.	Ranjana Reddy	June 30, 2021
8	School must institute processes to ensure CNA is based on qualitative and quantitative data to identify specific needs.	School has begun holding a series of parent/family/community meetings over the next few months, which will address CNA using quantitative and qualitative data. Meetings will be held quarterly thereafter. School will submit evidence to OSEP.	Ranjana Reddy	June 30, 2021
9	School must revise its ASP to reflect the FY2021 ESEA Amendment Application	School will revise its ASP to reflect the FY2021 ESEA Amendment Application. School will submit verification to OSEP.	Nick Finc	May 15, 2021.
10	School must provide evidence to clarify the positions in the finding, including job descriptions and time/activity reports.	School will provide job descriptions and time/activity reports for positions on Title I grant to OSEP. These positions are a second teacher, college placement counselor, assistant school leader, school office manager,	Ranjana Reddy	May 15, 2021



		school leader in residence. School will amend FY21 EWEG application to remove duplicative job titles.		
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<b>Title 3</b>				
1	School must reverse charges in the amount of \$29,323 and submit documentation to OSEP for review.	School will reverse charges and submit evidence to OSEP.	Richard Kim	May 15, 2021

<b>IDEA</b>				
1	The school must provide parents notice of a meeting in writing early enough to ensure they have an opportunity to attend.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021

2	The school must provide parents written notice at least 15 calendar days prior to the implementation of a proposed action so the parent may consider the proposal.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021
3	The school must ensure all meetings are conducted with required participants and documentation of participation is maintained in students' records.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021
4	The school must ensure identification meetings are conducted within 20 calendar days of receipt of a written	Child Study Team members and Speech Language Pathologists will receive refresher trainings	Faith Ware	May 15, 2021


	request for evaluation.	on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.		
5	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.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021
6	The school must ensure all components of the functional assessment are conducted as part of all initial evaluations.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to	Faith Ware	May 15, 2021


		ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.		
7	The school must ensure each IEP contains the required considerations and statements of students eligible for special education and related services and speech-language services. IEPs developed did not consistently include: <ul style="list-style-type: none"> <li>• documentation related to measurable goals and objectives including those for science and social studies; and</li> <li>• document in the IEPs of students eligible for special education and related services the relevant factors considered determining whether a student requires an extended school year program (ESY).</li> </ul>	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report. Once identified non-compliant IEPs are identified, they will be corrected.	Faith Ware	May 15, 2021
8	The school did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, including students placed in separate settings, consideration	Child Study Team members will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure	Faith Ware	May 15, 2021

	<p>of placement in the least restrictive environment. Specifically, IEPs did not consistently include:</p> <ul style="list-style-type: none"> <li>• supplementary aids and services considered and an explanation of why they are not appropriate</li> <li>• comparison of the benefits provided in the general education class and the benefits provided in the special education class</li> <li>• the potentially beneficial or harmful effects which a placement in general education may have on the students with disabilities or other students in the class</li> <li>• for students in separate settings, the school activities necessary to transition the student to a less restrictive environment</li> </ul>	<p>essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report. Once identified non-compliant IEPs are identified, they will be corrected.</p>		
9	<p>The school did not consistently document in the IEP all required age 14 transition components. Specifically, IEPs did not consistently include:</p> <ul style="list-style-type: none"> <li>• student interests, preference and strengths; and</li> <li>• identification of the staff member(s) responsible to serve as the liaison to post-secondary resources and make referrals to the resources as appropriate</li> </ul>	<p>Child Study Team Members attended a Transition Training led by Bill Freeman (NJ DOE) on 2/26/21. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance</p>	Faith Ware	May 15, 2021

		Manager weekly and communicated via a weekly school compliance report.		
10	The school must ensure that written parental consent is obtained prior to conducting any assessment as part of the initial evaluation for students referred for special education and related services. Documentation of parental written consent must be maintained in the student's file.	Child Study Team members and Speech Language Pathologists will receive refresher trainings on IEP processes and timelines. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021
11	The school must ensure that each student with an IEP age 14 or above is provided with a written invitation to any IEP meeting where transition to adult life will be discussed.	Child Study Team Members attended a Transition Training led by Bill Freeman (NJ DOE) on 2/26/21. Additionally, they will be provided with supplemental checklists to ensure essential elements and timelines are met. Oversight will be provided by the Director of Special Education and Compliance Manager weekly and communicated via a weekly school compliance report.	Faith Ware	May 15, 2021

<b>Administrative</b>				
1	School must implement processes to ensure that grants are recorded properly in financial records.	School policies will be updated so that accountants can reconcile internal reports to the EWEG system on a quarterly basis to make sure that internal accounting system and EWEG reconcile.	Richard Kim	May 15, 2021

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 Steve Small                      4/15/2021  
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 Chief School Administrator                      Date

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CC258E41327443A...  
 Richard Kim                      4/14/2021  
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 Board Secretary/Business Administrator                      Date