



## State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

PHILIP D. MURPHY  
*Governor*

TAHESHA L. WAY  
*Lt. Governor*

KEVIN DEHMER  
*Acting Commissioner*

August 16, 2024

Mr. Christopher Garlin  
Office of Education, Director  
Dr. Lena Edwards Academic Charter School  
509 Bramhall Avenue  
Jersey City, New Jersey 07304

Dear Mr. Garlin:

The New Jersey Department of Education (NJDOE) has completed a review of funds received and disbursed from one or more federal programs by the Dr. Lena Edwards Academic Charter School. The funding sources reviewed are attributable to various federal education laws including, but not necessarily limited to: Every Student Succeeds Act (ESSA); the Individuals with Disabilities Education Act (IDEA); and the Coronavirus Aid Relief, and Economic Security Act.

The review covered the period July 1, 2023 through April 30, 2024. The resulting report is enclosed. Please provide a copy of the report to each board member. All reports issued on the Collaborative Monitoring of Federal programs and grants will be posted on the department's website at <https://www.nj.gov/education/compliance/monitor/collaborative/>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the district is required, pursuant to N.J.A.C. 6A:23A-5.6 to publicly review and discuss the findings in the 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 findings in dispute excluding findings attributable to the IDEA program. The NJDOE's Office of Special Education will work directly with the district on the resolution of IDEA program findings. 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.

If you would like to pursue an appeal further than the initial review, you have the right to file an appeal to the Commissioner of Education through the Office of Controversies and Disputes pursuant to N.J.A.C. 6A:3-1. et seq. The Petition of Appeal is to be submitted to the following address: Commissioner of Education, c/o Director of Office of Controversies and Disputes, New Jersey State Department of Education, 100 Riverview Plaza, Trenton, NJ 08625.

[www.nj.gov/education](http://www.nj.gov/education)

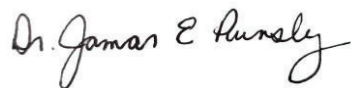
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Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your school district's website.

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 Lisa D. McCormick at (609) 206-4347.

Sincerely,



Dr. Jamar E. Purnsley  
Director, Office of Fiscal Accountability and Compliance

Enclosures

c: Kevin Dehmer  
Laura Console  
Kathleen Ehling  
Jordan Schiff  
Michael Yapple  
Lisa D. McCormick  
Leslie Franks-McRae  
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Jersey City, New Jersey 07304  
Phone: (201) 433-5300



New Jersey K to 12 Education

Collaborative Monitoring Report  
August 2024

**Charter School:** Dr. Lena Edwards Academic Charter School  
**County:** Hudson  
**Dates Monitored:** May 28, 29, 30 and 31, 2024  
**Case Number:** CM-12-24

**Funding Sources:**

<b>Program</b>	<b>Funding Award</b>
Title I, Part A	267,800
Title I SIA	25,000
Title II, Part A	21,052
Title III	0
Title III Immigrant	0
Title IV, Part A	19,457
IDEA Part B, Basic and Preschool	101,892
ARP ESSER (includes all subgrants)	2,293,853
Perkins V	0
<b>Total Funds</b>	<hr/> 2,729,054 <hr/>

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## **Background**

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The Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA) and other Federal education laws require local education agencies (LEAs - school districts and charter schools) to provide programs and services to schools within their local jurisdiction. The provision of these programs and services is based on the pertinent authorizing statutes specified in each of the Federal education laws.

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 subrecipients. The monitors thereby determine whether the funds are being properly used by the charter school for their intended purposes and achieving the overall objectives of the funding initiatives.

## **Introduction**

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The NJDOE visited Dr. Lena Edwards Academic Charter School (DLEACS or charter school) virtually, except where noted, to monitor the charter school's use of Federal funds. The NJDOE also examined related program plans, as applicable, to determine whether the charter 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 requirements of each program, Federal and state laws, and applicable regulations. The monitoring of DLEACS included staff interviews, as well as the review of documents and records related to the requirements of these programs:

- Title I, Part A (Title I);
- Title I SIA;
- Title II, Part A (Title II-A);
- Title III Immigrant;
- IDEA Part B - Basic and Preschool; and
- American Rescue Plan (ARP) ESSER and applicable subgrants.

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

- accounting records
- annual audits
- board of education (board) meeting minutes
- grant applications program plans and needs assessments
- grant awards
- payroll records
- purchase orders

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The scope of work included interviews with appropriate charter school staff regarding the administration of the aforementioned programs/grants. In addition, a sampling of computing devices and equipment purchased with Federal funds was selected and physically examined without exception.

The grants and programs reviewed included Title I, Title I SIA, Title II-A, Title III IDEA Basic and IDEA Preschool from July 1, 2023 through April 30, 2024. In addition, ARP ESSER and all applicable subgrants were reviewed from commencement of the related project periods through April 30, 2024. A sampling of purchase orders and/or salaries and wages was selected from each program and reviewed for examination.

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

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### **Title I, Part A Projects**

The purpose of the Title I is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

DLEACS is a K to 8 charter school that operates a schoolwide program in its Title I-funded school. In FY 2024, the charter school is utilizing Title I funds primarily to pay the salaries and benefits of basic skills teachers to supplement the instruction of low-performing students, and for social-emotional learning programs.

### **Title I SIA Projects**

The School Improvement Award (SIA) is allocated to districts with schools identified as needing comprehensive support and improvement (CSI/CII), targeted support and improvement (TSI), or additional targeted support and improvement (ATSI). SIA exclusively supports evidence-based practices, as defined by the Every Student Succeeds Act (ESSA), which demonstrate a statistically significant effect on improving student outcomes, as reflected in studies with strong, moderate, or promising evidence of effectiveness.

DLEACS exited ATSI status at the end of the 2023-2024 school year. FY 2024 SIA funds are budgeted to provide tutoring services for students.

### **Title II-A Projects**

The purpose of Title II-A is to:

1. increase student achievement consistent with the challenging State academic standards;
2. improve the quality and effectiveness of teachers, principals and other school leaders;

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3. increase the number of teachers, principals and other school leaders who are effective in improving student academic achievement in schools; and
4. provide low-income and minority students greater access to effective teachers, principals and other school leaders.

In FY 2024, Title II-A funds are used primarily for building systems of support for excellent teaching and learning while increasing student achievement consistent with the challenging State academic standards.

### **Title III Immigrant Projects**

The purposes of the Title III Immigrant program include:

1. family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children;
2. recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth;
3. provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth;
4. identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds;
5. basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services;
6. other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and
7. activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.

**Note:** The term multilingual learner is synonymous with “English learner” or “English language learner.” Sources which are cited from the United States Department of Education may still reference the use of the term English learner or EL. The NJDOE recognizes that multilingual learners may enter New Jersey’s schools with a level of proficiency in a world language other than English. The NJDOE will use “Multilingual Learner” and “ML,” respectively, to shift to asset-based language and honor a student’s primary language.

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In FY 2024, the charter school did not receive an allocation of Title III Immigrant funds. However, a programmatic review was conducted due to the enrollment of MLs and applicable ESEA requirements.

## **IDEA**

The purpose of the IDEA grant is to provide Federal entitlement funds to assist with the excess costs of providing special education and related services to students with disabilities. The FY 2024 IDEA Basic and Preschool funds are being used for contracted child study team services and/or related services.

## **Title IV-A Projects**

The purpose of Title IV-A is to improve students' academic achievement by increasing the capacity of LEAs to:

1. provide all students with access to a well-rounded education;
2. improve school conditions for student learning; and
3. improve the use of technology in order to improve the academic achievement and digital literacy of all students.

In FY 2024, the charter school used Title IV-A funds primarily to provide all students with access to a well-rounded education, improve school conditions for student learning, and incorporate the use of technology to improve the academic and digital literacy of all students.

## **ARP ESSER**

The purpose of ARP ESSER funding is to assist LEAs in preparing for and responding to the impact of COVID-19 on educators, students, and families. Additional uses of funds include, but are not limited to:

1. hiring new staff and avoiding layoffs; and
2. addressing learning loss through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs.

DLEACS uses its ARP ESSER funds mainly for the following:

1. educational technology such as Chromebooks, MacBooks, wi-fi services and instructional software licenses;
2. tutoring services for students through a third-party provider;
3. consultant for students with disabilities;
4. speech services;
5. replacement of flooring;
6. copper and lead testing;

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7. installation of a lockdown and emergency notification system;
8. professional development (PD); and
9. field trips.

ARP ESSER subgrant funds are being used for, among other things: professional development for staff; teacher stipends for extended day/school year programs; and an educational consultant. Subgrant funds are also budgeted for the salaries and benefits of a guidance counselor.

## **Detailed Findings and Recommendations**

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The Detailed Findings and Recommendations are disaggregated into the following sections:

1. Multiple Grants Section – findings necessitating correction, or the reversal of charges due to the lack of adequate supporting documentation, for multiple grants.
2. Grant Specific Programmatic and Fiscal Section – findings directly attributable to the Federal awards covered during the monitoring. The programmatic findings precede the fiscal findings unless otherwise denoted by an asterisk (\*).
3. Administrative Section – crosscutting administrative findings may be found in this section.

### **Multiple Grants Section**

#### **Title I, Title II-A, Title IV-A, IDEA Basic, and ARP ESSER and applicable subgrants**

##### **Finding 1**

The charter school is not submitting reimbursement requests for Title I and other Federal awards on a monthly basis.

In addition, the accounting records provided for examination in some cases could not be reconciled to the amounts claimed for reimbursement purposes and/or supporting documentation for the reimbursement requests was not provided as requested. Of note, the charter school submitted reimbursement request (RR) one on February 26, 2024 for Title I expenditures in the amount of \$252,148. This figure exceeded the dollar amount of actual expenditures of \$186,916.69 supported by underlying accounting records. The resulting difference of \$65,231.31 represents an early draw-down of funds.

Pursuant to the Uniform Grant Guidance, LEAs must minimize the time elapsing between the receipt of funds from NJDOE for reimbursement purposes and the payment of grant expenditures. To this end, the department’s guidance on reimbursement requests authorizes LEAs to claim expenditures that:

1. *have already been paid*; or
2. will be paid within three (3) days of receipt of its reimbursement check.

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In regard to number 2 above, the charter school should only request the reimbursement of expenditures for invoices in hand and determined to be accurate.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.305 Federal Payment and [Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures](#)

**Required Action(s):**

The charter school is required to submit copies of accounting records and a spreadsheet reconciling their Title I expenditures for FY 2024 Final Expenditure Report (FER) purposes. The documentation must be uploaded for review by the Office of Fiscal Accountability and Compliance (OFAC) through the Collaborative Federal Monitoring (CFM) Homeroom Application following submission of the Title I FER.

Additionally, the charter school is required to submit RRs monthly basis and to maintain supporting documentation for seven (7) years. Such documentation must be made available to the NJDOE, the U.S. Department of Education, and/or their authorized representatives upon request.

## **Grant Specific Programmatic and Fiscal Section**

### **Title I, Part A**

The review of the charter school's 2023-2024 Title I programs yielded no programmatic findings. The fiscal review of these programs resulted in the previous finding, the following finding and one or more which are more broadly addressed in the Administrative Section.

**Finding 1:**

The charter school's Expenditure Account Detail for Title I disclosed distinct subcodes are not being used to track the reserve for students experiencing homelessness. Amounts expended for this set-aside must be used for allowable program activities and accounted for separately to enhance the charter school's ability to monitor unexpended balances, which may be carried forward, provided the funds are spent for their intended purpose or returned to the state.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(3) Financial Management

**Required Action(s):**

The charter school must implement procedures to ensure that reserves are accounted for separately.

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**Title I SIA**

The review of the charter school's 2023-2024 Title I SIA programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

**Title II-A**

The review of the charter school's 2023-2024 Title II-A programs yielded no programmatic findings. The fiscal review of these programs resulted in findings which are addressed more broadly in the Administrative Section.

**IDEA**

The review of the charter school's 2023-2024 IDEA programs yielded no programmatic findings. The fiscal review of these programs resulted in the following finding and findings which are addressed more broadly in the Administrative Section.

**Finding 1:**

The charter school originally allocated purchase order (PO) number 202400022 in the amount of \$1,878 for the provision of related services by a consultant to IDEA Basic. Of this figure, \$1,849 was subsequently transferred to IDEA Preschool - the extent of budgeted funds available. The charter school, however, was unable to provide records evidencing the services were acquired for eligible beneficiaries, ages 3 to 5. In the absence of such documentation, the amount transferred is not allocable to IDEA Preschool.

Pursuant to the Uniform Grant Guidance, charges to Federal awards must be among other things:

1. necessary, reasonable, and *allocable* to the Federal award; and
2. adequately documented.

**Citation(s):**

Uniform Grant Guidance, §§200.403 Factors affecting allowability of costs and 200.405 Allocable costs

**Required Action(s):**

The charter school is required to reverse the allocation of the PO identified in its IDEA Preschool accounting records and transfer \$1,849 of the associated costs to IDEA Basic. As part of the submission of its corrective action plan (CAP) or after the filing of FERs for IDEA Basic and Preschool, the charter school is required to submit through the CFM Homeroom Application copies of the following records:

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1. accounting records for IDEA Basic and Preschool for the period July 1, 2023 through September 30, 2024; and
2. spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on corresponding FERs.

## **ARP ESSER and Applicable Subgrants**

### **ARP ESSER**

#### **Finding 1:**

The charter school issued PO number 20240018 for a field trip to Wightmans Farm on October 25, 2023 for approximately 132 students and 33 adults. The associated costs of \$1,540 were allocated to ARP ESSER. While an explanation for the field trip was provided, the charter school was unable to produce for examination contemporaneous documentation which demonstrates a programmatic purpose.

Pursuant to the Uniform Grant Guidance, the costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.

Moreover, in accordance with the Uniform Grant Guidance, charges to Federal awards must be among other things:

1. necessary, reasonable, and allocable to the Federal award; and
2. adequately documented.

#### **Citation(s):**

Uniform Grant Guidance, §§200.1 Definitions: Period of Performance, 200.403 Factors affecting allowability of costs, 200.405 Allocable costs and 200.438 Entertainment costs

#### **Required Action(s):**

The charter school must provide contemporaneous records documenting the program objectives and rationale for the field trips identified in the table above. The charter school must upload copies of such records to OFAC through the CFM Homeroom Application within thirty (30) days from the date of this report of examination (ROE).

In the absence of the requested documentation, the charter school is required to reverse the PO identified in its accounting records. Additionally, as part of the submission of its corrective action plan (CAP) or after the filing ARP ESSER FER, the charter school is required to upload copies of the following records through the CFM Homeroom Application:

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1. accounting records for ARP ESSER for the period July 1, 2023 through September 30, 2024 evidencing the reversal of \$1,540; and
2. spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on the corresponding FER.

**ARP Accelerated Learning**

**Finding 1:**

The charter school paid for refreshments and/or miscellaneous supplies for the following events and allocated the costs to ARP Accelerated Learning Coaching and Educator Support subgrant (ARP Accelerated Learning):

<b>PO Nbr.</b>	<b>Date</b>	<b>Vendor</b>	<b>Amount</b>
20230059	8/23/2022	Everything Ice Event for staff on 8/31/2022	350.00
20230070	9/08/2022	Reimbursement to Mary Gurczeski for PD refreshments and miscellaneous supplies	333.09
Total			683.09

The charter school provided documentation for the POs identified does not appear to align with the purpose of the main allocation or subgrant, nor demonstrate the costs were necessary and reasonable for the performance of the Federal award. Moreover, the Dr. Lena Edwards Charter School Purchasing Manual, January 2023 Edition, indicates, in part, the following:

“Light meals and refreshments are not permitted for employees and staff of a school district unless the staff member or employee is essential to a *student activity* where light meals or refreshments are being served.”

Based on the foregoing, the aggregate costs of \$683.09 are unallowable and therefore, are not allocable to the ARP Accelerated Learning subgrant.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.403 Factors affecting allowability of costs and 200.405 Allocability of costs; N.J.A.C. 6A:23A-5.8(b)(4) District board of education expenditures for non-employee activities, meals, and refreshments; and N.J.A.C. 6A:23A-7.12(d)

**Required Action(s):**

The charter school is required to reverse the POs identified and upload copies of the following records through the CFM Homeroom Application after the filing ARP Accelerated Learning FER:

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1. accounting records for ARP Accelerated Learning for the period July 1, 2023 through September 30, 2024 evidencing the reversal of expenditures totaling \$683.09; and
2. spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on the corresponding FY 2024 FER.

**ARP Beyond the School Day**

**Finding 1:**

The charter school was asked to provide accounting and payroll records to support the compensation paid to staff members with Federal funds. The charter school provided copies of electronic Time Detail Reports (TDRs) which do not substantiate payroll costs reallocated from account number 61-000-100-100 to the ARP Evidence-Based Comprehensive Beyond the School Day Activities subgrant (ARP Beyond the School Day):

Line Item	Date	Amount
100-100	2/15/2024	4,329.46
100-100	3/31/2024	4,204.80
200-100	1/15/2024	167.34
200-100	3/15/2024	467.23
Total		9,168.83

In particular, the TDRs were generated for entire months in lieu of biweekly or bimonthly time periods which coincide with the payroll dates shown. Also, the number of hours in the “Total Hours” column do not add to the aggregate “Hours” summarized on the bottom of the employees’ timesheets.

Pursuant to the Uniform Grant Guidance, charges to Federal awards for salaries and wages must be:

1. necessary, reasonable, and allocable to the Federal award;
2. adequately documented; and
3. based on records that accurately reflect the work performed.

In order to avoid potential monetary findings, time and activity reports (TARs) must be prepared by staff members whose salaries are funded in whole or in part by Federal awards. In addition, timesheets must be completed by employees paid on an hourly basis. The TARs and timesheets must reflect what grant-funded staff are doing, as well as when and where they are working. This documentation is necessary to verify that grant funded staff are performing activities allowable under each Federal award.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.430(i) Standards for Documentation of Personnel Expenses and §200.403(g) Factors affecting allowability of costs

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**Required Action(s):**

The charter school must submit timesheets which support the payroll charges for ARP Beyond the School Day subgrant summarized in this finding. Otherwise, the charter school must upload copies of the following records through the CFM Homeroom Application after filing their ARP Beyond the School Day FER:

1. accounting reports for the subgrant identified for the period July 1, 2023 through September 30, 2024 which reflect the reversal of the payroll expenditures totaling \$9,168.83; and
2. the exclusion of these figures listed from the corresponding FY 2024 FER.

**Administrative Section**

**Finding 1:**

The charter school submitted board policies for examination which address certain Uniform Grant Guidance provisions. Copies of certain board policies and the requisite written procedures to implement such policies, however, were not provided for review as requested. Examples include, but are not necessarily limited to:

- determining the allowability of costs in accordance with Federal cost principles and the terms and conditions of the Federal award; and
- the mandatory disclosure of all violations of Federal criminal law involving fraud (pertinent information relating to fraud follows), bribery, or gratuity violations potentially affecting the Federal award.

Pursuant to ESEA legislation, each recipient of a grant or subgrant under ESEA must display, in a public place, the hotline contact information of the Office of Inspector General of the Department of Education (USDEOIG) so that any individual who observes, detects, or suspects improper use of taxpayer funds can easily report such improper use.

Federal guidance relating to the prevention of fraud is accessible from [USDEOIG Brochures](#); scroll past multiple tables to the Brochures, Flyers & Posters (Download Free) section. Use this link, [For K–12: Preventing Fraud and Corruption in Federal Education \(2021\)](#), to access a video training presentation.

**Citation(s):**

ESEA §9203 Preventing Improper Use of Taxpayer Funds; Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment, 2 C.F.R. §§200.302(b)(6)-(7) Financial management and 2 C.F.R. §§200.400 – 200.476 Subpart E - Cost Principles; and §200.113 Mandatory disclosures

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**Required Action(s):**

The charter school must develop, revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations and references to current legislation, where appropriate. The charter school may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.

**Finding 2:**

On a few occasions, the charter school failed to issue a purchase order prior to goods being purchased or services being rendered (confirming order). State regulations require that a *properly executed* purchase order be issued *prior* to the purchase of goods or the rendering of services.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302(b)(4) Financial management and N.J.S.A. 18A:18A(2)(v) Definitions "Purchase Order"

**Required Action(s):**

Purchase orders should be issued to all vendors prior to goods or services being provided.

**Finding 3:**

A number of purchase order voucher packets were selected and examined during monitoring. The charter school was unable to provide evidence that bids or quotes were obtained for various POs. Examples include PO numbers 202400134 and 202400310. These POs exceeded the threshold necessitating bids or quotes in accordance with:

1. the New Jersey Public School Contracts Law (PSCL) and charter school policy; or
2. procurement standards under Uniform Grant Guidance.

When the Federal and State legislation and regulations governing procurement are in conflict, the most restrictive prevails. Federal procurement standards do not include all exemptions allowed under the PSCL, specifically, professional services.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §§200.317 - 327 Procurement Standards and N.J.S.A. 18A:18A-37(a) Award of purchases, contracts, or agreements

**Required Action(s):**

The charter school must adhere to the PSCL or applicable provisions of the Uniform Grant Guidance, whichever is most restrictive, when obtaining goods and services.

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**Finding 4:**

A number of purchase orders were examined during the monitoring with dollar amounts equal to or greater than \$25,000. Such purchase orders meet one of a number of definitions of a covered transaction in 2 C.F.R. §180.220. Before entering into covered transactions, these regulations require the charter school to determine whether the vendor is not debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The covered transactions tested lacked any indication that verifications of this nature are being performed. Verifications may be accomplished by:

1. checking the SAM Exclusions maintained by the General Services Administration and available at [SAM.gov | Home](https://sam.gov);
2. collecting a certification from the entity; or
3. adding a clause or condition to the covered transaction with that entity (2 C.F.R. section 180.300).

Copies of written evidence demonstrating performance of the requisite verifications must be maintained. In addition to items 1 and 2 above, other examples of evidence include printouts of search results from SAM, imprints from an ink stamp, or Avery labels affixed to purchase orders memorializing performance of this verification.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.214 Suspension and debarment

**Required Action(s):**

The charter school is required to implement procedures to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000. In addition, the charter school must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.

**Finding 5:**

The charter school charged a number of expenditures to incorrect line items (also referred to as expenditure categories). For example, tutoring services for students and PD registration fees were recorded under line item 200-300. The costs should have been charged to line items 100-300 and 200-500, respectively.

**Citation(s):**

Uniform Grant Guidance, 2 C.F.R. §200.302 Financial Management, N.J.A.C. 6A:23A-16.2 Principles and directives for accounting and reporting and The Uniform Minimum Chart of Accounts for New Jersey Public Schools and Approved Private Schools for Students with Disabilities (UMCOA)

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**Required Action(s):**

The charter school must adhere to the UMCOA and ensure expenditures are recorded in the general ledger or expenditure account detail under line items approved in the grant application.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of every finding and implementation of all required actions and recommendations contained in this report.

If you have any questions, please contact Lisa D. McCormick via phone at (609) 376-3608 or via email at [lisa.mccormick@doe.nj.gov](mailto:lisa.mccormick@doe.nj.gov).

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OFFICE OF FISCAL ACCOUNTABILITY AND COMPLIANCE  
CORRECTIVE ACTION PLAN**

NAME OF SCHOOL DISTRICT : Dr. Lena Edwards Academic Charter School CO Hudson

TYPE OF EXAMINATION: Collaborative Federal Monitoring

DATE OF BOARD MEETING: 27-Aug-24

CONTACT PERSON: Brian Falkowski, School Business Administrator

TELEPHONE NUMBER: 732-631-4009 FAX NUMBER: 732-400-8468

RECOMMENDATION NUMBER	CORRECTIVE ACTION REQUIRED BY THE BOARD	METHOD OF IMPLEMENTATION	PERSON RESPONSIBLE FOR IMPLEMENTATION	COMPLETION DATE OF IMPLEMENTATION
<p>Multiple Grants Section - Finding 1</p>	<p>The charter school is required to submit copies of accounting records and a spreadsheet reconciling their Title I expenditures for FY 2024 Final Expenditure Report (FER) purposes. The documentation must be uploaded for review by the Office of Fiscal Accountability and Compliance (OFAC) through the Collaborative Federal Monitoring (CFM) Homeroom Application following submission of the Title I FER.</p> <p>Additionally, the charter school is required to submit RRs monthly basis and to maintain supporting documentation for seven (7) years. Such documentation must be made available to the NJDOE, the U.S. Department of Education, and/or their authorized representatives upon request.</p>	<p>Dr. Lena Edwards Academic Charter School acknowledges the requirement and importance to submit payment requests from EWEG on a monthly basis. This practice will be adopted and performed going forward for all subsequent grants and fiscal years. Documentation will be updated to the CFM Homeroom Application.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Grant Specific Programmatic and Fiscal Section Title I, Part A - Finding 1</p>	<p>The charter school must implement procedures to ensure that reserves are accounted for separately.</p>	<p>Dr. Lena Edwards Academic Charter School understands that amounts expended for set-aside must be used for allowable program activities and accounted for separately and has implemented procedures to ensure that reserves are accounted for separately.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>

<p>Grant Specific Programmatic and Fiscal Section IDEA - Finding 1</p>	<p>The charter school is required to reverse the allocation of the PO identified in its IDEA Preschool accounting records and transfer \$1,849 of the associated costs to IDEA Basic. As part of the submission of its corrective action plan (CAP) or after the filing of FERs for IDEA Basic and Preschool, the charter school is required to submit through the CFM Homeroom Application copies of the following records:  1.accounting records for IDEA Basic and Preschool for the period July 1, 2023 through September 30, 2024; and  2.spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on corresponding FERs.</p>	<p>Dr. Lena Edwards Academic Charter School has reversed the allocation of the PO identified in IDEA Preschool accounting records and transferred the \$1,849 back to IDEA Basic. Documentation of these reversals will be uploaded to the CFM Homeroom Application.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Grant Specific Programmatic and Fiscal Section ARP ESSER - Finding 1</p>	<p>The charter school must provide contemporaneous records documenting the program objectives and rationale for the field trips identified in the table above. The charter school must upload copies of such records to OFAC through the CFM Homeroom Application within thirty (30) days from the date of this report of examination (ROE).  In the absence of the requested documentation, the charter school is required to reverse the PO identified in its accounting records. Additionally, as part of the submission of its corrective action plan (CAP) or after the filing ARP ESSER FER, the charter school is required to upload copies of the following records through the CFM Homeroom Application:  1.accounting records for ARP ESSER for the period July 1, 2023 through September 30, 2024 evidencing the reversal of \$1,540; and  2.spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on the corresponding FER.</p>	<p>Dr. Lena Edwards Academic Charter School has reversed the allocation of the PO identified and transferred the funds back to the General Fund. Documentation of these reversals will be uploaded to the CFM Homeroom Application as well as rationale.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Grant Specific Programmatic and Fiscal Section ARP Accelerated Learning - Finding 1</p>	<p>The charter school is required to reverse the POs identified and upload copies of the following records through the CFM Homeroom Application after the filing ARP Accelerated Learning FER:  1.accounting records for ARP Accelerated Learning for the period July 1, 2023 through September 30, 2024 evidencing the reversal of expenditures totaling \$683.09; and  2.spreadsheets reconciling the expenditures recorded in the accounting records from item one to the amounts reported on the corresponding FY 2024 FER</p>	<p>Dr. Lena Edwards Academic Charter School has reversed the allocation of the PO identified and transferred the funds back to the General Fund. Documentation of these reversals will be uploaded to the CFM Homeroom Application.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>

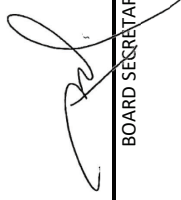
<p>Grant Specific Programmatic and ARP Beyond the School Day - Finding 1</p>	<p>The charter school must submit timesheets which support the payroll charges for ARP Beyond the School Day subgrant summarized in this finding. Otherwise, the charter school must upload copies of the following records through the CFM Homeroom Application after filing their ARP Beyond the School Day FER:</p> <ol style="list-style-type: none"> <li>1. accounting reports for the subgrant identified for the period July 1, 2023 through September 30, 2024 which reflect the reversal of the payroll expenditures totaling \$9,168.83; and</li> <li>2. the exclusion of these figures listed from the corresponding FY 2024 FER.</li> </ol>	<p>Dr. Lena Edwards Academic Charter School will submit timesheets which support the payroll charges for the ARP Beyond the School Day subgrant.</p>	<p>Pat West Coordinator of Development, Grants and Public Relations</p>	<p>8/27/2024</p>
<p>Administrative Section - Finding 1</p>	<p>The charter school must develop, revise, adopt and implement board policies and written procedures which address the requirements of the Uniform Grant Guidance, and include relevant citations and references to current legislation, where appropriate. The charter school may opt to utilize a vendor for the preparation and revision of the requisite board policies and procedures.</p>	<p>Dr. Lena Edwards Academic Charter School will review and ensure that there are current board policies and written procedures that address the requirements of the Uniform Grant Guidance and include relevant citations and references to current legislation. If necessary, the school will either revise, adopt, or develop a board policy that is sufficient with this requirement.</p>	<p>Christopher Garlin, CEO</p>	<p>8/27/2024</p>
<p>Administrative Section - Finding 2</p>	<p>Purchase orders should be issued to all vendors prior to goods or services being provided.</p>	<p>Dr. Lena Edwards Academic Charter School acknowledges and will ensure that an executed purchase order must be in place for all vendors prior to goods or services being provided.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Administrative Section - Finding 3</p>	<p>The charter school must adhere to the PSCL or applicable provisions of the Uniform Grant Guidance, whichever is most restrictive, when obtaining goods and services.</p>	<p>Dr. Lena Edwards Academic Charter School acknowledges and will adhere to the PSCL or applicable provisions of the Uniform Grant Guidance whichever is most restrictive with obtaining goods and services.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Administrative Section - Finding 4</p>	<p>The charter school is required to implement procedures to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000.00. In addition, the charter school must maintain written records evidencing performance of these verifications on file for monitoring and audit purposes.</p>	<p>Procedures have been put in place at the school to confirm vendors are neither debarred, nor suspended prior to entering into purchase orders or contracts equal to or in excess of \$25,000.00. Backup documentation will be kept in each vendor's file evidencing these verifications took place for audit purposes.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
<p>Administrative Section - Finding 5</p>	<p>The charter school must adhere to the UMCOA and ensure expenditures are recorded in the general ledger or expenditure account detail under line items approved in the grant application.</p>	<p>Dr. Lena Edwards will adhere to the Uniform Minimum Chart of Accounts (UMCOA) to ensure the school is utilizing the correct general ledger and expenditure account codes for all purchases.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>

<p>Administrative Section - Finding 7</p>	<p>As part of the submission of its CAP, the charter school is required to provide copies of accounting records and/or spreadsheets supporting the amounts claimed for its two most recent FY 2024 reimbursement requests for Title I and IDEA Basic. The aforementioned documentation must be uploaded via the CFM Homeroom application. Additionally, the charter school is required to submit reimbursement requests on a monthly basis. Also, the charter school is responsible for maintaining supporting documentation for seven (7) years and for making it available to the NJDOE, the U.S. Department of Education, and/or their authorized representatives upon request.</p>	<p>Dr. Lena Edwards Academic Charter School acknowledges the requirement and importance to submit payment requests from EWEG on a monthly basis. This practice will be adopted and performed going forward for all subsequent grants and fiscal years.</p>	<p>Brian Falkowski, School Business Administrator</p>	<p>8/27/2024</p>
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CHIEF SCHOOL ADMINISTRATOR

DATE



BOARD SECRETARY/SCHOOL BUSINESS ADMINISTRATOR

8/27/2024

DATE