	:	SUPERIOR COURT OF NEW JERSEY
LEONOR ALCANTARA, individually and as guardian ad litem for E.A.; LESLIE JOHNSON, individually and as guardian ad litem for D.J.; JUANA PEREZ, individually and as guardian ad litem for Y.P.; TATIANA ESCOBAR, individually; and IRA SCHULMAN, individually and as guardian ad litem for A.S.,	:	APPELLATE DIVISION

LEONOR ALCANTARA, individually and as guardian ad litem for E.A.; LESLIE JOHNSON, individually and as guardian ad litem for D.J.; JUANA PEREZ, individually and as guardian ad litem for Y.P.; TATIANA ESCOBAR, individually; and IRA SCHULMAN, individually and as guardian ad litem for A.S.,

    Appellants,

v.

ANGELICA ALLEN-MCMILLAN, Acting Commissioner of the New Jersey Department of Education; THE NEW JERSEY STATE BOARD OF EDUCATION; and THE NEW JERSEY DEPARTMENT OF EDUCATION,

    Respondents.

: SUPERIOR COURT OF NEW JERSEY
: APPELLATE DIVISION

: DOCKET NUMBER: A-2493-23

: <u>CIVIL ACTION</u>

: ON APPEAL FROM A FINAL DECISION OF THE ASSISTANT COMMISSIONER OF EDUCTION

: AGENCY DOCKET NO.: 156-6/14

APPENDIX ON BEHALF OF RESPONDENTS

VOLUME II of II (Ra173 to Ra354)

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GOVERNANCE

This chapter reviews the governance and policy practices of the Lakewood Public School District. The first part of this chapter focuses on the policy-setting and oversight practices of the Lakewood Board of Education. The second half of chapter focuses on the leadership and decision-making practices of the District administration. Throughout the chapter, we seek to understand how these practices may impact the overall efficacy of the District.

SUMMARY

- **Board Meetings**. Public Board meetings practices do not align with practices of comparable districts or follow recommendations from the New Jersey School Boards Association.
- **Board Policies.** Board meeting agendas contained policy updates and new policies; however, there was no policy discussion during any of the observed meetings. PCG found outdated and/or ill-informed policies that directly impact student learning.
- **Financial Transparency.** Board involvement with budget development was reported to be minimal. There were no observed board meetings that discussed financial issues or presented detailed information regarding budgets. There appears to be no urgency or accountability for the District's financial situation by leadership.
- **Culture.** PCG observed a culture of low expectations for students, and high levels of distrust between central office administration and school-based staff.
- **Communication.** There are communication gaps from the central office administration with both internal and external stakeholders.
- **Strategic Plan.** The organizational management of the District is not based on a coherent system focused on a District strategic plan. Without a strategic plan, the District relies on a series of annual goals that lack accountability as they do not have metrics that can determine how successful the District is in meeting their goals. Several annual goals are duplicated from previous years.
- **Reporting Structure.** The organization's reporting structure does not follow typical practice, as it is designed with a large number of administrators reporting directly to the Superintendent. The Superintendent has 24 direct reports, including all curriculum supervisors, and there is no Assistant Superintendent.
- **Board Attorney.** The Lakewood Board of Education attorney plays a far more active role than the typical board attorney in District business. The Board Attorney stated that his role is not only Board Attorney, but he also provides the District a service similar to a Communications Director. Lakewood's legal expenses per pupil are significantly higher than comparison districts.
- **Decision-making.** Large-scale district planning appears to occur behind closed doors. For example, the District changed the configuration of schools for elementary and middle schools this school year. The grade configuration consisted of moving hundreds of students and staff with little notice or explanation as to why the decision was made. There was no discussion at Board meetings or opportunity to provide public input.
- **Human Resources Practices.** The District reports struggling to hire staff to fill all their vacancies each year. Lack of competitive salaries with neighboring districts was cited as a key barrier, yet several current practices may impact staff morale. New staff are hired at a higher pay rate than veterans and 77 teacher contracts have been non-renewed in the past five years. School administrators reported frequent building reassignments, with limited communication or notice.
- **Morale.** Staff stated multiple times that the District has a morale issue. Staff reported not feeling respected and fear retaliation from the administration if they speak out in a critical way. Instances of unresponsiveness or unclear communication from the District contribute to a perception of inadequate support.

LAKEWOOD SCHOOL BOARD GOVERNANCE

School board governance creates a structure for how District decisions are made through the adoption of policies throughout the year. Board governance includes defining expectations and creating school board roles and responsibilities. It also addresses financial and people resources, including documentation, as outlined, for school Districts in New Jersey, in the *New Jersey Quality Single Accountability Continuum* (*NJQSAC*) reports.[9] The NJQSAC provides a level of transparency and accountability to the District's stakeholders. This section focuses on Governance components of the NJSQAC.

Best Practices Framework

Adopting an effective governance model includes implementing proper practices to ensure that the District is well-run, and where student achievement is the main focus. There are five school board governance research best practices that while different that NJQSAC, should guide school boards and school Districts towards success.[10]

These five practices are:

- **Create a Shared Vision.** A shared vision aligns decision-making. A shared vision guides decisions made at the full board level or even within committees as well as policy development. Board members must be committed to and invested in their vision.
- **Define Goals.** A clear shared vision can help the board identify the path forward, developing concrete goals that are measurable will help the Board attain their vision. Additionally, NJ State School Boards Association suggests that school boards must determine Districts' long-range (strategic) educational goals for a five-year period, the financial implications of those goals, and the appropriate financial strategies to reach those goals including the community impact.[11]
- **Develop Policies.** Developing policies for the school District is a key responsibility for school boards. Policies create a structure for the school District in which the superintendent and other District staff can work. Policy is one way the board communicates what it expects of their administration. Policies should clearly define what the board intends or requires, leaving the "how" of implementation and administration to the superintendent or their designees.[12] Whether the policies come from a committee or the board, the decision-makers should always ask themselves whether or not the policy will further student success.
- **Build Relationships.** Though governance models originate with the board, for governance to be its most effective, all stakeholders must be on board, from the superintendent to the teachers. The board-administrator relationship is critical to the success of a school District. In a study commissioned by the National School Boards Association, the Center for Public Education[13] found effective school boards have a collaborative relationship with staff and the community and establish a strong communications structure to inform and engage both internal and external stakeholders in setting and achieving District goals.
- **Monitor the Budget.** Lacking funds can significantly impact a school board's priorities regardless of its governance practices. Whether the board has a finance committee or a treasurer, it should constantly monitor the budget to ensure the District has enough funds to operate and bring about change identified during goal setting. The New Jersey School Boards Association (NJSBA) states that school board members should:

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[9] *New Jersey Quality Single Accountability Continuum (NJQSAC).* (n.d). Official Site of The State Of New Jersey. https://www.nj.gov/education/qsac/

[10] *School board governance models and best practices.* (2022, August). Diligent. https://www.diligent.com/resources/blog/school-board-governance-model

[11] *Board's Role in Finance and Budget Development.* (n.d). NJ State School Boards Association. https://www.njsba.org.

[12] School Board Policy versus Regulation: What's the Difference? https://www.tasb.org/members/enhance-district/school-board-policy-and-regulation.aspx#:~:text=Policies%20define%20the%20purposes%20and,what%20it%20wants%20of%20administration.

[13] Dervarics, C & O'Brien, E. (2019). *Eight Characteristics of Effective School Boards.* Center for Public Education. https://www.nsba.org/-/media/NSBA/File/cpe-eight-characteristics-of-effective-school-boards-report-december-2019.pdf

- o Set budget parameters and priorities for budget development process in accordance with policy
- o Understand proposed budget implications, programs, and changes
- o Reach consensus on a budget appropriate for students and taxpayers that support student achievement
- o Assist in explaining the budget to the general public in accordance with policy and indicate how it supports student achievement
- o Evaluate on an on-going basis the implementation of the budget
- o Review and approve the monthly Board Secretary and Treasurer's financial reports.[14]

Analysis of Public School Board Meetings

School board meetings provide the community with the opportunity to observe and inform school district policy formation and decision making. PCG used an adapted rubric titled, *Meeting Management Assessment: Board of Distinction* to determine the Lakewood Public School District's Board of Education's level of adherence to effective practices for school board meetings.[15] The rubric was used to observe the public portion of the meetings from July 12, 2023 to December 13, 2023. The rubric was also used to observe the December 2023 board meetings of comparable school Districts.

PCG received videos of the Lakewood Public School District Board of Education meetings provided by the District. Recordings of previous School Board meetings are not publicly available on the Lakewood Public School District's website, YouTube, or other publicly accessible channels. Lakewood Board of Education's minutes and agendas are publicly posted on Board Docs,[16] a software tool used by the District to store board meeting information. The Board held two meetings in August 2023, but PCG received only one video from the Board meeting on August 9, 2023. Therefore, we did not include the August 23, 2023 meeting in the data analysis. PCG attended the December 13, 2023 board meeting in person.

All meeting videos from comparable Districts were publicly available. PCG aggregated the data from the four separate District meetings to use as a comparison with the aggregated meeting data from the Lakewood Board of Education.

The data collection rubric is divided into three categories:
1. Agenda
2. Operation of the Meeting by the Trustee President
3. Trustee Member Participation

Tables were color coded as follows:
- Yellow: Governance Indicator being observed during meeting
- Green: Yes, Indicator observed during meeting
- Purple: No, Indicator not observed during meeting

TABLE 2: LAKEWOOD REGULAR BOARD OF EDUCATION MEETING, JULY 12, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	Yes/No	Indicators	Yes/No	Indicators	Yes/No
Well-organized meeting agenda supported by necessary documentation	Yes. The agenda contained items and information to support the items	All Board Members were present	No. 5 Present (in-person) 4 Not Present	Board members kept their comments or questions focused on the agenda items	No. There were no agenda items discussed

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[14] *Boards Role in Finance &* Budget Development School Board's Association. Board's Role in Finance and *Budget Development.* (2018). New Jersey School Boards Association. https://www.njsba.org/wp-content/uploads/2018/02/SFC_BOARDSROLEINFINANCEANDBUDGDEV.pdf.

[15] *Tennessee School Board Association (TSBA).* (n.d.). Meeting Management Assessment. Board of Distinction.

[16] *Lakewood Board Documents.* (n.d.). https://go.boarddocs.com/nj/lboe/Board.nsf/Public.

Only agenda items were discussed	**No**. There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No**. The meeting was guided by the Board Secretary (Interim Business Administrator) and the Board Attorney, not Board president	**Board president made certain all members had equal opportunity to present their views**	**No**. There were no members who presented views
Board members made informed comments and asked appropriate questions regarding agenda items	**No**. There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No**. There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No**. There was no Board discussion or problem solving.
Public Comment time available during meeting	**Yes**. Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No**. There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes**. The meeting was respectful
Public Board Meeting Approximate Time: 5 minutes					

Note. Retrieved from "Lakewood BOE video" provided by Lakewood Public School District, 2023, (https://drive.google.com/file/d/1pD8FK77rq26XQ6p06XWXlTaq4i_PXYgL/view?usp=sharing) and Retrieved from, "Lakewood Board Docs" provided by Lakewood Public School District, 2023, (https://go.boarddocs.com/nj/lboe/Board.nsf/Public.)

TABLE 3: LAKEWOOD REGULAR BOARD OF EDUCATION MEETING, AUGUST 9, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	**Yes/No**	**Indicators**	**Yes/No**	**Indicators**	**Yes/No**
Well-organized meeting agenda supported by necessary documentation	**Yes.** The agenda contained items and information to support the items	**All Board Members were present**	**No.** 4 Present (in-person) 1 Present (via Zoom) 4 Not Present	**Board members kept their comments or questions focused on the agenda items**	**No.** There were no agenda items discussed
Only agenda items were discussed	**No.** There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No.** The meeting was guided by the Board Secretary (Interim Business Administrator) and the Board Attorney, not Board president	**Board president made certain all members had equal opportunity to present their views**	**No.** There were no members who presented views
Board members made informed comments and asked appropriate questions regarding agenda items	**No.** There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No.** There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No.** There was no Board discussion or problem solving.
Public Comment time available during meeting	**Yes.** Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No.** There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes.** The meeting was respectful
Public Board Meeting Approximate Time: 45 minutes					

Note. Data are from "Lakewood BOE video" https://drive.google.com/file/d/1u1y7ZImXAp5HLGwyOlEJK-a-_-DQCX3v/view?usp=sharing) and "Lakewood Board Docs", 2023 (https://go.boarddocs.com/nj/lboe/Board.nsf/Public.) provided by Lakewood Public School District, 2023

TABLE 4: LAKEWOOD REGULAR BOARD OF EDUCATION MEETING, SEPTEMBER 20, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	Yes/No	Indicators	Yes/No	Indicators	Yes/No
Well-organized meeting agenda supported by necessary documentation	**Yes.** The agenda contained items and information to support the items	**All Board Members were present**	**No.** 3 Present (in-person) 2 Present (via Zoom) 4 Not Present	**Board members kept their comments or questions focused on the agenda items**	**No.** There were no agenda items discussed
Only agenda items were discussed	**No.** There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No.** The meeting was guided by the Board Secretary (Interim Business Administrator) and the Board Attorney, not Board president	**Board president made certain all members had equal opportunity to present their views**	**No.** There were no members who presented views
Board members made informed comments and asked appropriate questions regarding agenda items	**No.** There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No.** There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No.** There was no Board discussion or problem solving.
Public Comment time available during meeting	**Yes.** Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No.** There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes.** The meeting was respectful
Public Board Meeting Approximate Time: 11 minutes					

Note. Data are from "Lakewood BOE video" (https://drive.google.com/file/d/1kuest93WmGHfZ6JGGnJX03t17ZeEGYPw/view?usp=drive_link) and "Lakewood Board Docs", 2023, (https://go.boarddocs.com/nj/lboe/Board.nsf/Public.) provided by Lakewood Public School District

TABLE 5: LAKEWOOD REGULAR BOARD OF EDUCATION MEETING, OCTOBER 18, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	Yes/No	Indicators	Yes/No	Indicators	Yes/No
Well-organized meeting agenda supported by necessary documentation	**Yes.** The agenda contained items and information to support the items	**All Board Members were present**	**No.** 5 Present (in-person) 4 Not Present	**Board members kept their comments or questions focused on the agenda items**	**No.** There were no agenda items discussed
Only agenda items were discussed	**No.** There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No.** The meeting was guided by the Board Secretary (Interim Business Administrator) and the Board Attorney, not Board president	**Board president made certain all members had equal opportunity to present their views**	**No.** There were no members who presented views
Board members made informed comments and asked appropriate questions regarding agenda items	**No.** There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No.** There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No.** There was no Board discussion or problem solving.

Public Comment time available during meeting	**Yes**. Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No**. There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes.** The meeting was respectful
Public Board Meeting Approximate Time: 1 hour 10 minutes					

Note. Data are from *"*Lakewood BOE video" provided by Lakewood Public School District, 2023, (https://drive.google.com/file/d/1mFC29EJM-s5fgwY1ukYq8Bu1Aawh3Ana/view)
and "Lakewood Board Docs" provided by Lakewood Public School District, 2023, (https://go.boarddocs.com/nj/lboe/Board.nsf/Public)

TABLE 6: LAKEWOOD REGULAR BOARD OF EDUCATION MEETING, NOVEMBER 15, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	**Yes/No**	**Indicators**	**Yes/No**	**Indicators**	**Yes/No**
Well-organized meeting agenda supported by necessary documentation	**Yes.** The agenda contained items and information to support the items	**All Board Members were present**	**No.** 5 Present (in-person) 1 Present (via Zoom) 3 Not Present	**Board members kept their comments or questions focused on the agenda items**	**No.** There were no agenda items discussed
Only agenda items were discussed	**No.** There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No.** The meeting was guided by the Board Secretary (Interim Business Administrator) and the Board Attorney, not Board president	**Board president made certain all members had equal opportunity to present their views**	**No**. There were no members who presented views
Board members made informed comments and asked appropriate questions regarding agenda items	**No.** There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No**. There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No.** There was no Board discussion or problem solving.
Public Comment time available during meeting	**Yes**. Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No.** There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes.** The meeting was respectful
Public Board Meeting Approximate Time: 1 hour 33 minutes					

Note: Data are from "Lakewood BOE video., 2023 (https://drive.google.com/file/d/1CmsxoPdUdtWVKZfDXfRvUmrgr1HmsNqQ/view) and
"Lakewood Board Docs", 2023, (https://go.boarddocs.com/nj/lboe/Board.nsf/Public.) provided by Lakewood Public School District

TABLE 7: REGULAR BOARD OF EDUCATION MEETING, DECEMBER 15, 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	**Yes/No**	**Indicators**	**Yes/No**	**Indicators**	**Yes/No**
Well-organized meeting agenda supported by necessary documentation	**Yes.** The agenda contained items and information to support the items	**All Board Members were present**	**No.** 7 Present (in-person) 1 Present (late arrival) 1 Not Present	**Board members kept their comments or questions focused on the agenda items**	**No.** There were no agenda items discussed
Only agenda items were discussed	**No.** There was no discussion of any agenda items	**The Board President guided the meeting effectively**	**No.** The meeting was guided by the Board Secretary (Interim Business	**Board president made certain all members had equal opportunity to present their views**	**No.** There were no members who presented views

			Administrator) and the Board Attorney, not Board president		
Board members made informed comments and asked appropriate questions regarding agenda items	**No.** There were no comments or questions by board members	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	**No.** There was no action that needed the Supt to make recommendations.	**Board members used the Board meeting time for genuine discussion and problem solving.**	**No.** There was no Board discussion or problem solving.
Public Comment time available during meeting	**Yes.** Although provided with an opportunity, there were no public comments made during the meeting	**When decisions were made, it was clear who should carry it out and when**	**No.** There were no decisions made during the meeting	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	**Yes.** The meeting was respectful
Public Board Meeting Approximate Time: 30 minutes					

Note. Retrieved from "Lakewood Board Docs", provided by Lakewood Public School District (https://go.boarddocs.com/nj/lboe/Board.nsf/Public)

TABLE 8: LAKEWOOD AGGREGATED BOARD OF EDUCATION MEETING DATA FROM JULY-DECEMBER 2023

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	**Percentage of Meetings Adhering to Indicator**	**Indicators**	**Percentage of Meetings Adhering to Indicator**	**Indicators**	**Percentage of Meetings Adhering to Indicator**
Well-organized meeting agenda supported by necessary documentation	100%	**All Board Members were present**	0%	**Board members kept their comments or questions focused on the agenda items**	0% *(no comment or questions were made)*
Only agenda items were discussed	100%	**The Board President guided the meeting effectively**	0%	**Board president made certain all members had equal opportunity to present their views**	0%
Board members made informed comments and asked appropriate questions regarding agenda items	0%	**Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented**	0%	**Board members used the Board meeting time for genuine discussion and problem solving.**	0%
Public Comment time available during meeting	100%	**When decisions were made, it was clear who should carry it out and when**	0%	**Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters**	100%
Average Public Board Meeting Approximate Time: 42 minutes *(range: 5 minutes to 1 hour 33 minutes)*					

Note. Retrieved from "Lakewood Board Docs", provided by Lakewood Public School District (https://go.boarddocs.com/nj/lboe/Board.nsf/Public)

Overall:
- All meetings had well-organized meeting agendas supported by necessary documentation.
- Board members were not observed making comments or asking questions at any meeting.
- While public comment was available at every meeting, PCG only observed one public comment from a local reporter asking a question.
- No board meeting had all members present.
- The Board President did not facilitate/lead any board meetings observed by PCG
- There were no Board actions that required the Superintendent's input.
- There was no Board discussion, problem-solving or decision-making observed.
- PCG did not observe any negative, disrespectful or derogatory remarks by Board members.

Comparable Districts' Board of Education Meetings- December 2023

Aggregated Data Collected from Jersey City, Jackson, Toms River, and Brick Boards of Education Regular Meetings held during December 2023 (video and agenda reviewed for each Board meeting)

TABLE 9: AGGREGATED BOARD OF EDUCATION MEETING DATA (DECEMBER 2023)

Agenda		Operation of Mtg by Board President		Board Member Participation	
Indicators	**Percentage of Boards Adhering to Indicator**	**Indicators**	**Percentage of Boards Adhering to Indicator**	**Indicators**	**Percentage of Boards Adhering to Indicator**
Well-organized meeting agenda supported by necessary documentation	75%	All Board Members were present	50%	Board members kept their comments or questions focused on the agenda items	75%
Only agenda items were discussed	75%	The Board President guided the meeting effectively	75%	Board president made certain all members had equal opportunity to present their views	75%
Board members made informed comments and asked appropriate questions regarding agenda items	100%	Whenever possible, the Board withheld definite Board action until after the Supt's recommendations were presented	100%	Board members used the Board meeting time for genuine discussion and problem solving.	75%
Public Comment time available during meeting	100%	When decisions were made, it was clear who should carry it out and when	75%	Trustees avoided negative, disrespectful or derogatory remarks to other Board members or presenters	75%
Average Public Board Meeting Approximate Time: 2 hours					

Note. Retrieved from "Brick Township Public Schools BOE" by Board Meeting Video, 2023, (https://www.youtube.com/watch?v=r63kDiIVv1E&t=5715s); "Agenda" by Brick Township Public Schools (https://www.brickschools.org/our-district/board-of-education/mms/); "Jackson Public Schools BOE" Board Meeting Video, 2023, https://www.youtube.com/@BrickBOEAgenda; Agenda, https://www.jacksonsd.org/Page/7367; "Jersey City Public Schools BOE" Board Meeting Video, Dec 14, 2023, https://www.jcboe.org/apps/pages/index.jsp?uREC_ID=1577781&type=d&pREC_ID=1705346; Agenda, https://go.boarddocs.com/nj/jcps/Board.nsf/Public?open&id=policies#; "Toms River Regional Schools BOE" Board Meeting Video, Dec 20, 2023, https://www.youtube.com/watch?v=U-luzA3f3EQ; Agenda, https://www.trschools.com/administration/docs/2023/12/_01-Agenda-December-20,-2023.pdf.

Lakewood Board of Education Meetings Data Analysis

The Lakewood Board of Education meetings had very little data to analyze. The meetings were short, focused more on presentations and less on discussion and action regarding important Board business. The following items were observed that did not align with practices of comparable Districts or recommendations from the New Jersey School Boards Association:

- **Board Attendance.** Board attendance was under 50% at most meetings. The outlier was the Board meeting that PCG attended on December 15, 2023, of which the District was informed in advance of PCG's attendance. That meeting had only one Board member not in attendance. Of all the meetings observed from July 2023 to December 2023, it was the only meeting that 8 out of 9 Board members attended a regular Board meeting.

- **Board Meeting Operations.** In all observed meetings, the Lakewood Board of Education meetings were not led by the Board president, but rather the Interim Business Administrator and the Board's Attorney. This practice does not align with Lakewood Policy *0164-Conduct of Board Meeting*.[17] The policy states *that "the President shall preside at all meetings of the Board. In the absence, disability, or disqualification of the President, the Vice President shall act in his/her place; if neither person is*

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[17] *Lakewood School Board Policy Manual.* (n.d.). Policy 0164 CONDUCT OF BOARD MEETING

present, any member shall be designated by a plurality of those present to preside." That policy is read at the beginning of each board meeting by the Interim Business Administrator but is not followed as read. Moreover, according to the New Jersey School Boards Association's Basic Parliamentary Procedures, the person presiding over a meeting is referred to as the chair or chairperson. Usually, that individual is the board president. The principle duties of the chair per the New Jersey School Board Association are to:

- o open the meeting at the appointed time;
- o announce in proper sequence the order of business or agenda;
- o recognize members who are entitled to the floor;
- o state and to put to vote all motions, and to announce the result of each vote;
- o rule if a motion is made that is out of order; protect against obviously frivolous or dilatory motions;
- o enforce the rules relating to debate and those relating to order and decorum;
- o expedite business in every way compatible with the rights of members;
- o decide all questions of order, subject to appeal;
- o respond to inquiries of members relating to parliamentary procedure or factual information bearing on the business of the assembly; and
- o declare the meeting adjourned when the assembly so votes or, when applicable, at the time prescribed in the program, or at any other time in the event of a sudden emergency affecting the safety of those present.

During portions of some Lakewood Board of Education meetings the Superintendent participated in discussion on presentations or awards; however, the Superintendent did not take an active role in Board meetings, but rather deferred to the Board Attorney. This behavior was a sharp contrast to all other comparable Districts. In all comparable Districts, the board presidents and superintendents led the meetings in accordance with Roberts Rules of Order.[18]

- **Board Meeting Business.** Board meetings lacked action items, discussion on any agenda items such as presentations from staff, or any old or new board meetings. That was not true of the comparable school boards where old and new business were presented and discussed, action items were voted on, and the Board actively participated.

- **Board Committee Meetings**. There have been no committee reports during public board meetings for at least the past six months. The Board Committee assignments currently posted on the Lakewood School District website is dated February 28, 2022.[19] Additionally, there were no committee meetings dates posted or agenda/minutes publicly available. All other comparable school boards shared committee meeting business and minutes during the public session of the school board.

- **Consent Agenda**. The consent agenda was used throughout the board agenda. Typically, all items in a consent agenda are voted as an entire package without discussion unless a board member requests the removal of an item. Because no questions or comments are held on the consent agenda content, this procedure saves time.[20] With most agenda items within the consent agenda, the board meetings are much shorter than the comparable school board meetings. The average public meeting time for the observed Lakewood School Board meeting was 42 minutes while comparable Districts, who do not use consent agendas in the same way, if at all, averaged two hours per board meeting.

- **Financial Business.** There were no observed board meetings that discussed financial issues or presented detailed information regarding budgets. All budget information was placed on the consent agenda and did not have any details or discussion by board members. In contrast, the

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[18] Robert, R.M., Honemann, D., Balch, T. & all. (2020). *Roberts Rules of Order*, Newly Revised, 12th Edition. NY. Public Affairs.
[19] *Board Committee Structure.* (2022). Lakewood School District Website
[20] *Consent Agendas.* (2023). Board Source. https://boardsource.org/resources/consent-agendas/

comparable Districts reported on financial/business, prepared presentations, or participated in discussions focused on finances in 100% of the board meetings observed by PCG.

- **Policy Discussions.** There were no policy discussions held during any meeting since both the first and second readings of policies were placed on the consent agenda. Some boards may utilize a committee structure, where certain members of the board typically collaborate with the superintendent or other administrators to work on policy development and make recommendations to the full board for a vote. That is the process used by all the comparable school Districts, but it was not visible in Lakewood. Both the first and second readings of policies were on the consent agenda and never discussed. During the comparable board meetings, if new or revised policies were on the agenda, the policy was read and discussed if requested.

Board Adherence to Governance Best Practices

In addition to the Board of Education meetings, PCG collected data from focus groups, interviews, and document reviews to provide an overall analysis of the Lakewood Board Governance. PCG used the five best practice categories described earlier in the chapter to frame our analysis.

- **Create a Shared Vision.** The Lakewood Board of Education has a mission developed in 2007. The mission states, *"Lakewood Public Schools is a diverse educational community of students, staff and parents who work cooperatively to create a positive and safe environment where all students learn and reach their full potential through an academic emphasis on the New Jersey Core Curriculum Content Standards.... We modify programs and offer supports as necessary to assure access and progress for students with disabilities in the general education programs; help students reach their full potential; and promote intellectual, physical, moral social and cultural growth through curricular and co-curricular programs available to all."*

  This mission statement is posted on a Board webpage on the District's website. There is no vision statement or goals on the District's website. As a comparison, all comparable Districts have posted mission statements, and most have vision and goals that were accessible on their school District website.

- **Define Goals.** The Lakewood Public School District website, including the School Board page, does not define goals for the District. PCG asked school board members focus group participants about the *Board's* vision and goals for student success. Responses were not aligned and appeared to be personal thoughts rather than clearly articulated goals and objectives that the Board had developed as a governance group.

  The Superintendent reportedly presented a PowerPoint[21] on District goals annually at a Board Meeting. The District goals for the 2023-2024 school year include:
  - Goal 1: Improve Student Achievement
  - Goal 2: Student Wellness
  - Goal 3: Student & Staff Attendance
  - Goal 4: Fiscal Stability
  - Goal 5: Strengthen Community Relations
  - Goal 6: Safety & Security
  - Goal 7: Increase the Graduation Rate & Decrease the Dropout Rate

  Although some of the board answers during focus groups mentioned attendance and school discipline as goals, not one Board member spoke about the Superintendent's yearly presentation. It is difficult to conclude if that lack of information was just forgotten by each board member, or if the goals belong to the Superintendent and are not directly connected to the board members.

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[21] *Lakewood Public School District's Goals for the 2023-2024 School Year. (*2023). Lakewood Public School District website.

- **Develop Policies.** The School Board agenda and minutes reviewed for this analysis provided the titles of new or updated policies placed on the agenda. However, in no instance were Board policies read, reviewed, discussed, or questioned by any board member in a public meeting. In other comparable Districts, when policies were on the Board agenda, a member of the Policy Committee would read and review the policy and open the item to other Board members for discussion. In two Lakewood Board of Education meetings, October 18 and November 15, there were a significant number of new and revised policies placed on the agenda (25 policies and 13 regulations combined between the two meetings). Such a large quantity of policies requires a significant amount of time to review, write and/or revise. It is unclear as to the level of involvement of school board policy committee members, as there are no policy committee meetings reported during the full Board meeting. There were no policy committee minutes publicly available or any policy committee business discussed at Board meetings. Additionally, without reading and discussing policies (first and second readings), Board members are not able to inform the public about changes and additions to policies that will require adherence from members of the school District community. Policy practices are discussed in further detail later in this chapter.

- **Build Relationships.** Both school board members and the Superintendent shared during interviews and focus groups that they had a productive, professional relationship. School board members took pride in their efforts to build relationships within the community but admitted that it was difficult at times when so many families were native Spanish speakers. However, Board members were proud that meetings, both virtually and in-person, are translated in real time. They shared they do not often hear from parents and rarely receive emails or calls even though they said their numbers and emails are published on the District website. However, PCG was not able to locate Board contact information such as email addresses, phone numbers, or other contact information on the website. Most written Board materials (minutes, agendas, etc.) are not translated into Spanish.

- **Monitor the Budget.** Board of Education members have responsibilities monitoring the budget according to the New Jersey School Boards Association. The requirement of oversight is clearly documented by the NJSBA in the *Boards Role in Finance & Budget Development* guidance previously referenced. During every Lakewood Board Meeting reviewed between July 2023 and December 2023, there was never a forum, discussion, or questions regarding the budget. There may have been discussion at some other time in a non-public setting. However, Lakewood does not use a 'pre-meeting' structure to review the items on the agenda and, as reported during interviews and focus groups, some Board members never open their Board packet mailed to them until the day of the Board meeting. In all four comparison Districts' Board meetings, discussions were held on the lack of adequate funds due to the continuation of the NJ S2[22] school funding formula and the required cuts needed in their budgets. The cuts discussed by comparable Districts included staffing, which would lead to increased class size, after school activities, and other programs.

  During interviews and focus groups, it was stated that Board involvement with budget development is minimal. Budget development is based on a formula of adding a percentage to the prior year's budget and making additional adjustments when necessary. During more than one interview, it was stated that the District would not be able to develop a balanced budget without the additional funds from the New Jersey Department of Education as that additional revenue kept the District open. When asked if there was a plan to pay the money back to the state, it was confirmed that the District had no plan developed to repay the funds.

  When Board members were questioned about District finances, the response heard from multiple members was that the New Jersey state monitor shared with them that "Lakewood has a revenue

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[22] *NJ S2*. (2018). https://pub.njleg.gov/bills/2018/.

issue, not a spending issue." Additionally, when further asked about the budget, some responses included:

- o Board members are aware of the numbers in the budget but not entirely familiar with the details, given the complicated nature of the school budgets.
- o Not cutting staff is a budget priority.
- o The state monitor has never found anything that is not needed in the budget.
- o Lakewood Township provides substantial financial support on items that the District cannot afford such as courtesy busing.

When reviewing comparable Districts, most meetings included board and superintendent discussion focused on current funding as well as next year's funding. There was information provided for the board and public of possible consequences due to the final revenue cuts from New Jersey's S2 funding bill. Parents attended the board meetings and spoke about their concerns during public input. In Lakewood, there was little, if any, public input during meetings. However, there were a few meetings where the Board Attorney solicited parents from the audience to speak to the Board about the positive experiences their students had participating in different school sponsored activities.

Board of Education Policymaking Practices

Policymaking is one of the school board's most important roles. Through policymaking, a school board defines its vision for the District, the structure for accomplishing its goal — including the allocation of resources, and the system of accountability for achieving those goals. Board of Education policies also establish a legal record for the school District. How a school board approaches its policymaking responsibility is a strong indicator of whether it is an effective board in a high-achieving District.[23] According to the National School Boards Association, policy governance is not just updating the policy manual, but rather it is an opportunity to shape and modify the school District's future through discussion, debate and consideration of important issues contained in board policy. Boards that understand the importance of policy development and implementation can be more effective as a school board.[24]

In Lakewood, school board policies are consistently on the Board's consent agenda for updating. Some meetings have many policies and regulations listed. However, as previously noted, there is no public discussion regarding the policy additions or updates to inform the public as to the direction and vision of the board. Some board policies are mandated by the state due to changes in the laws and regulations, however many are developed by the board to set expectations and align to their vision and goals. Unfortunately, without reviewing and updating policies with open discussions and questions, the public, including families and staff, do not build an understanding of the board's direction and the outcomes attained through changes in policy.

PCG has highlighted three sample policies that have a big impact on the school District and its operations as an example of how the policy or regulation changes may have long term impact on the District.

Policy 5112: Entrance Age[25]
Policy 5112, Entrance Age was mentioned multiple times as a concern during school-based staff focus groups. The policy states, *"A child whose fifth birthday occurs on or before December 31 of any year will be admitted to Kindergarten after September 1 of the same year, subject to established residency and registration requirements".*[26] This policy was created in 2013.

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[23] Ashley, J.H. (2014). *Policymaking is the Work of School Boards.* Viewpoint. https://wasb.org/wp-content/uploads/2017/04/viewpoint_dec_2014.pdf.
[24] *The Key Work of School Boards Guidebook.* (2011). National School Boards Association. https://tsba.net/wp-content/uploads/2018/03/Key-Work-Cover-and-Text-20Jan15.pdf.
[25] *Lakewood School District Policy Manual.* (n.d.). Lakewood Board of Education. https://go.boarddocs.com/nj/lboe/Board.nsf/Public
[26] Ibid

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The concern regarding the policy is that in a typical New Jersey classroom, students entering kindergarten must turn five-years old by October 1st of that given school year, which means four-year old students are only present during the first month of school. In a Lakewood classroom, where the Board policy admits students who will not turn five-years old until December 31st, the difference is even greater. It is not unusual in any given school year to have a Lakewood kindergarten classroom consisting of four-, five-, and six-year-old students for the first four months of the school year. All comparable New Jersey Districts had a student's entrance age dependent on the October 1st birthdate.

Table 10 shows the number of students enrolling in Kindergarten before the New Jersey state cut off recommended date October 1st and students who turned five between October 1st through December 31st during the 2023-2024 school year. Students who turned five after October 1st account for 16% of the kindergarten student body.

TABLE 10: AGE OF ENROLLED KINDERGARTENERS, 2023-2024

	Turned 5 before October 1st	Turned 5 between Oct 1st and Dec31st	Turned 5 after December 31st
Total Grade K Enrollment	478	89	1

Note. Retrieved from "NJ SMART Data Extract, 2023" provided by Lakewood Public School District

Focus group participants reported how this policy impacts other grades. For example, a 3rd grade teacher shared that students in her class range from seven to ten years old. A 4th grade teacher noted the age range for her class is eight to eleven years old.

Studies have shown that in the early stages of school age children development, there is a significant difference in terms of maturity, behavior, and cognitive abilities between children during those stages of development.[27] Cognitive development for students that may be enrolled in a Lakewood kindergarten classroom can be substantially different. The gaps in literacy development can be only able to recognize a few letters as a four-year old to spelling their first name and other words as a six-year old. The same gaps are present in math as well. Those gaps continue as the student moves into upper grades.

A study from the National Bureau of Economics focused on the entry age for students found that children who start school at an older age do better than their younger classmates and have better odds of attending college.[28] The study suggests that if one looks at standardized test scores, the achievement gap could be equivalent to about 40 points on the 1600-point SAT.

Additionally, there is also evidence that the age at which children begin school can change the likelihood that a child is placed in special education or diagnosed with Attention Deficit/Hyperactivity Disorder (ADHD).[29] This large body of work provides consistent evidence that the youngest students in a grade cohort are more likely to receive both ADHD diagnoses and special education placements than are the oldest students. The study used a regression discontinuity design, which found that the youngest students in a kindergarten cohort are 40% more likely to be placed in special education than are the oldest students, and that this effect persists through eighth grade. Moreover, the author suggests that this effect is largest

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[27]Kuntsi, J. (2021). *Younger children in a school class at greater risk of long-term negative outcomes like low educational achievement and substance misuse.* Kings College London. https://www.kcl.ac.uk/news/younger-children-in-a-school-class-at-greater-risk-of-long-term-negative-outcomes-like-low-educational-achievement-and-substance-misuse.
[28] Dhuey, E., Figlio, D., Karbownik, K., & Roth, J. (2019). *School Starting Age and Cognitive Development.* Journal of Policy Analysis and Management. https://onlinelibrary.wiley.com/doi/10.1002/pam.22135
[29] Shapiro, J. (2022, June 19). *Exceptional Children. Over Diagnosed or Over Looked? The Effect of Age at Time of School Entry on Students Receiving Special Education Services.* Exceptional Children. Sage Journal. https://journals.sagepub.com/doi/10.1177/00144029221108735#tab-

in schools with kindergarten cohorts that vary widely in age similar to Lakewood where the student school age entry can be as late as December 31st of a school year.

This policy seems particularly problematic when coupled with the higher rates of students with disabilities within the Lakewood Public School District. This policy is one example of the need for robust and public policy discussions and the potential long-range impact of policy decisions made by the school board.

Policy 2330: Homework and Policy 7523 - School District Provided Technology Devices to Pupils[30]

PCG also identified a number of outdated policies. Some outdated policies directly impact teaching and learning practices and require a thoughtful approach by the Board to address the issues. The current Policy 2330-*Homework* and Policy 7523 - *School District Provided Technology Devices to Pupils* are two outdated policies that are intertwined for students, especially at the middle and high school level.

The Technology Device Policy (7523) was written in 2013 and does not address the instructional approach in 2024. Part of the outdated policy states:

> *A technology device made available to pupils will not be considered a textbook or supply, as defined in N.J.S.A. 18A:34-1, mandatory to a successful completion of the classroom curriculum. Therefore, because a technology device defined in this Policy is not mandatory to a successful completion of a pupil's classroom curriculum, a pupil will not be required to obtain a technology device provided by the school District as defined in this Policy. In the event the school District provides a technology device that is deemed mandatory to a successful completion of the classroom curriculum, the District will provide pupils with such a technology device consistent with its textbook or supply policies. Nothing in this Policy prohibits a pupil from using their personal technology device in accordance with school rules and regulations.*

Most instruction at Lakewood High uses a SMART Board, a District provided PowerPoint and a Chromebook with Google Classroom installed. Technology is a primary resource for student learning. In many instances, students do not have traditional textbooks, but rather digital textbooks or supplemental instructional materials on their Chromebooks. Additionally, most assignments are completed and turned in through a student assigned Google Classroom account. During classrooms observations, PCG computers to be an integral part of the curriculum in nearly all classrooms.

In addition to in-class assignments, homework is assigned using the personalized Google Classroom accounts. The *Homework Policy* (2330) was also last updated in 2013 and states that in most cases students do not require a computer to complete their assignments. Historically, that may have been true, but now, at both the elementary and secondary level, a computer is needed to complete assignments. However, many high school students focus group shared that they do not have a computer in their home. Without equitable access to appropriate technology, students reported using their personal cell phones to complete homework assignments, which may not be conducive to producing quality work, or just not completing computer-based assignments. Some teacher focus group participants shared they assign minimal homework or only paper-based homework for this reason. The District does not allow students to take home district-purchased devices.

It is difficult to understand how much the school board is aware of their policy impact on student achievement since there is no public discussion as to the content of policies or even the process for bringing policies for review and revision to the classroom. However, PCG observed its direct impact. In one classroom that PCG observed, a teacher spoke to her students about missing assignments and low grades. Many students requested "extra credit" to prevent from failing.

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[30] *Lakewood School District Policy Manual*. (n.d.). Lakewood Board of Education. https://go.boarddocs.com/nj/lboe/Board.nsf/Public

There does not appear to be a standard revision timeline or process for identifying school board policies that need a substantive review, or that may present barriers to improved student achievement.

Policy 5536: Random Testing for Student Alcohol or Other Drug Use[31]

The Random Testing for Student Alcohol or Other Drug Use policy was adopted in April 2021 after the New Jersey Legislature passed legislation for the random testing of school District students from grades six through twelve who:

- participate in the school District's interscholastic athletic program
- participate in the school District's extra-curricular program,
- receive a school District authorized parking permit to park a personal vehicle on school district property, and
- voluntarily elect to participate in the program with parental consent

The Board's policy allows the District to randomly test up to 10 percent of the students participating in the program on a monthly basis. The District's random drug and alcohol testing program tests for the use of controlled dangerous substances including alcohol, and anabolic steroids. This information is provided to each parent and student with a required consent form. If parents do not sign a consent form, or do not allow their student to be tested after they have been randomly selected, the student is no longer able to participate in any District program. None of the comparable Districts have adopted this policy. With the movement of sixth grade students out of middle school and into elementary schools, there is now a possibility of elementary students being drug tested.

PCG reviewed the process for adopting the policy. In communication to parents, it was stated that the Board held a public hearing on the adoption of Policy 5536- Random Drug and Alcohol Testing. PCG reviewed the minutes of the April 21, 2021 board meeting, when the policy was passed under the Superintendent's consent agenda. There were no public hearing minutes available. The minutes also stated there was no public comment made at the meeting. Therefore, it is unclear as to how the public was able to provide input on a policy that could directly impact their children.

School Board Governance Findings

- **Public Access**. Board meetings were only shown live to the public on Board meeting night. There are no Board meetings posted on the District website or other virtual platforms. The District shared recorded board meeting videos through a Google Drive account upon PCG's request. When viewed live, there is a staff member providing translation services throughout the Board meeting, however the recording PCG received was only in English. Additionally, one of the board meeting videos consisted of only "highlights" rather than the full board meeting. Not providing access to board meetings 'on demand' limits public knowledge and understanding of Lakewood initiatives and creates a gap in communication between the District and the community it serves.

- **Board Meeting Procedures**. Board meetings are not led by the Board President or Vice President in the President's absence in accordance with Roberts' Rules of Order, which is outlined in Policy 0164, Conduct of Board.[32, 33] The School Board Attorney leads most of the meetings and directs the Board members and Superintendent throughout the meeting. The level of control the Board Attorney assumes during Board meetings was not observed in the comparable Districts. Additionally, the Lakewood Superintendent did not take an active role during the Board meetings and was deferential to the Board Attorney. This behavior was not observed in the comparable Districts, all of which were better aligned with the recommended New Jersey Parliamentary Procedures.

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[31] *Lakewood School District Policy Manual.* (n.d.). Lakewood Board of Education. https://go.boarddocs.com/nj/lboe/Board.nsf/Public
[32] *Roberts Rules of Order.* (2020)
[33] *Lakewood Board Policy.* (n.d.). 0164- CONDUCT OF BOARD MEETING

- **Communication:** Board business was not discussed during public meetings observed by PCG. Between July 9 through December 13, 2023, 0% of the Regular Board meetings included Old Business, New Business, Committee Reports, or Communication reports. There was no discussion on any substantive item during any Board meeting from July 9, 2023 to December 13, 2023.

- **Action Items:** All action items were bundled into two consent agendas, approval of the minutes, and a motion to dismiss. In the six months of board meetings observed, there were no individual action items on other board business such as polices, finance reports, new programs, etc. Since most of the action items fell under the consent agenda, there was no discussion to inform the public on board business. All comparable Districts took action and engaged in discussion.

- **Board Committees:** Board Committee agendas and/or minutes are not posted, discussed during Board meetings, or recorded for public viewing. Since there were no meeting minutes, it was unclear if any Board committee meetings were held during the previous six months.

- **Financial Reporting:** No financial reporting or discussion occurred during any observed Board meeting. The financial report is approved within the consent agenda with no comments from the administration or questions by Board members.

- **Policy Development:** Board meeting agendas contained policy updates and new policies; however, there was no policy discussion (either first or second readings) during any of the observed meetings. PCG found outdated and/or ill-informed policies that directly impact student learning.

ADMINISTRATIVE TEAM GOVERNANCE

The role of governance is the responsibility of the local school board; however, the Superintendent and the administrative team are tasked with guiding the school board and implementing their decisions.

Best Practices Framework

The American Association of School Administrators (AASA) Superintendent Standards outlines the critical knowledge and skills that superintendents must employ to be effective leaders within their Districts.[34] PCG used these standards to determine how strong the alignment is between the current practice of the Lakewood Superintendent and the administrative team and the best practices highlighted by the AASA.

The Standards include:

- **Leadership and District Culture**. The superintendent works in a collegial and collaborative manner with school personnel and the community to promote and support the mission and goals of the school District while creating an atmosphere of trust and mutual respect with staff and community.

- **Policy and Governance.** The superintendent develops procedures for working with the board of education that define mutual expectations, working relationships and strategies for formulating District policies.

- **Communications and Community Relations.** The superintendent promotes effective communication and interpersonal relations within the District. In addition, works collaboratively with staff, families, and community members to secure resources and to support the success of a diverse student population.

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[34] DiPaola, M. F. (2010). *Evaluating the Superintendent.* A White paper from the American Association of School Administrators. https://www.aasa.org/docs/default-source/resources/reports/Evaluating-the-Superintendent.

- **Organizational Management**. The superintendent effectively manages human, material, and financial resources to ensure student learning and to comply with the state mandates.

- **Curriculum Planning and Development.** The superintendent plans, implements, supports and assesses instructional programs that enhance teaching and student achievement of the state educational standards.

- **Instructional Management.** The superintendent functions as the primary instructional leader for the District, relying on support from staff as necessary when advising the school board.

- **Human Resources Management.** The superintendent implements sound personnel procedures in recruiting, employing and retaining the best-qualified and most competent teachers, administrators and other personnel.

- **Values and Ethics of Leadership.** The superintendent models professional, moral, and ethical standards as well as personal integrity in all interactions.

PCG collected and analyzed data based on the following standards. Not all standards were reviewed here as the focus areas are being addressed in other sections of the report.

Leadership and District Culture

District leaders, from principal supervisors to superintendents, play a critical role in establishing a culture of growth, satisfaction, and impact. School culture is the foundation on which effective schools are built. The same is true for Districts. The key ingredients, of a positive school and District culture includes:

- Establishing a shared school mission, values and behaviors focused on academic and social-emotional success for every student.
- Building and maintaining meaningful relationships among teachers and staff and creating an environment where all members feel safe, valued, and seen.
- Purposefully engaging families and communities in mutual partnerships that promote the well-being of students, families, and the community.[35]

Organizational Structure
The organizational structure of the Lakewood Public School District is shown in Figure 6. The organization's reporting structure is designed with many administrators reporting directly to the Superintendent.
- The superintendent has 24 direct reports.
- There is no Assistant Superintendent.
- Direct reports include nine principals that are represented by one box within the organizational chart.
- The Board of Education Attorney reports directly to the Board of Education. Typically, in most Districts, including the comparable Districts, the only position that reports to the Board is the Superintendent. If they have a Board Attorney on staff, that person reports to the Superintendent.
- The number of direct reports to the Superintendent is much higher than other Districts. For example, in Toms River, the direct reports of the superintendent is seven.[36] In Brick, there are five direct reports.[37] Both of those Districts show that the only staff position reporting to the school board is the superintendent.

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[35] *Innovative Ways to Create A Positive School (and District) Culture.* (n.d.). New Leaders, Leadership Changes Everything.
https://www.newleaders.org/blog/innovative-ways-to-create-a-positive-school-and-district-culture
[36] *Toms River Organization Flow Chart.* (2023). Toms River Regional Schools.
https://www.trschools.com/administration/docs/2023/08/_Organizational-Flow-Chart-TRRSD-2023_2024.pdf
[37] *Brick Township Public Schools Organizational Chart* (2021). Brick Township Board of Education, Brick, New Jersey
https://www.nj.gov/education/finance/fp/acfr/search/21/0530.pdf

- All comparable Districts had at least one assistant superintendent.

When meeting in focus groups and interviews with Central Office staff, there seemed to be confusion about which positions had more influence. The principals reported that the curriculum supervisors hold more influential positions than principals, which impacts their decision-making authority, However, the curriculum supervisors believed the principals were at a higher level, even though they need to ask curriculum supervisors' permission to make changes to their school's instructional schedule. The Superintendent reported that both groups were at the same level in the organization as they were in the same collective bargaining unit.

FIGURE 6: LAKEWOOD BOARD OF EDUCATION 2023-2024 ORGANIZATIONAL CHART
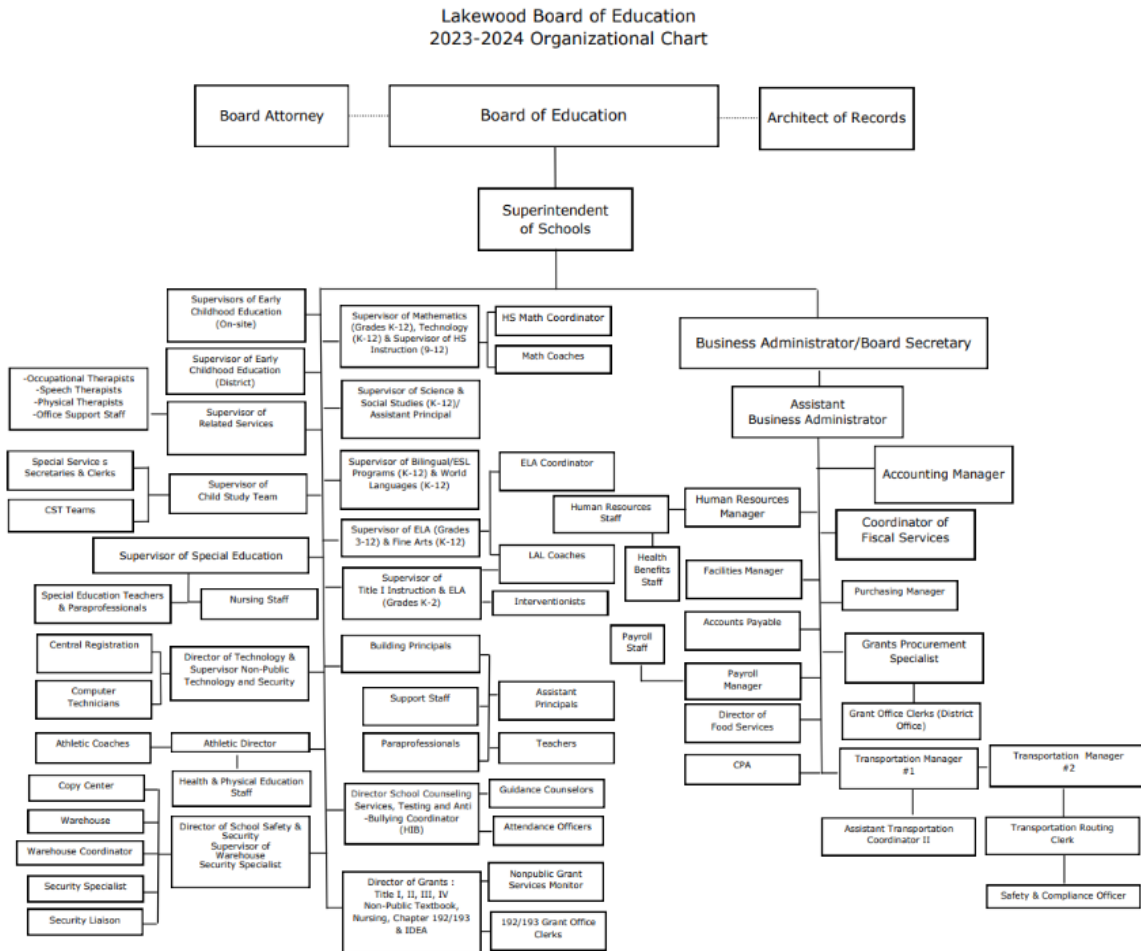
Note. Retrieved from "Lakewood Organizational Chart", 2024, provided by Lakewood Public School District

Role of Board of Education's Attorney

School board attorneys are employed by school boards to represent their Districts in legal matters. Their job duties include offering advice on legal and policy matters, researching legal issues, and representing the school District in litigation matters.[38] The Lakewood Board of Education Attorney's duties encompass legal and policy matters, as well as litigation. However, the Lakewood Board of Education attorney plays a

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[38] *Advisors Guiding School Boards on Legal Matters*. (n.d.). National Schools Board Association.
https://www.nsba.org/Services/Council-of-School-Attorneys/What-School-Lawyers-Do.

far more active role than the typical board attorney in District business. The Board Attorney stated that his role is not only Board Attorney, but he also provides the District a service similar to a Communications Director. He speaks with the press, conducts video presentations, and ensures the messages coming from the District are similar. In most Districts, these duties are the role of a Communications Director or the Superintendent.

Moreover, when viewing the District's board meetings, the Board of Education Attorney leads much of the board sessions. He engages with the public providing additional information about the students presenting and oversees the flow of the meeting, which is typically the Board chair's role.

Legal Expenses

For the Financial Practices Analysis, PCG partnered with accounting firm AAFCPA to analyze expenditures that were out of the expected norm for a category. AAFCPA used the Budgetary Comparison Schedule's from Exhibit C-1 in the Annual Comprehensive Financial Report (ACFR) to determine Legal services line items and used the Actual amounts to compare the expense over a 5-year period for Lakewood and the comparison districts, as shown in Figure 7: Legal Expense By District Per Pupil By Year. AAFCPAs used the actual expense during the given school year and divided by cost per pupil. Lakewood's legal expenses per pupil are significantly higher than the comparison districts. It is further noted that there was a significant increase in expenses between 2019 - 2020 and 2020 - 2021. This increase is not consistent with any of the other comparison districts.

AAFCPAs noted there is a decrease between 2021 - 2022, but the legal cost per pupil is still over four times the amount of the next highest district. Looking at the table below, that compares total legal expenses from C-1, Lakewood still has the highest legal expenses among all the districts in the analysis.[39]
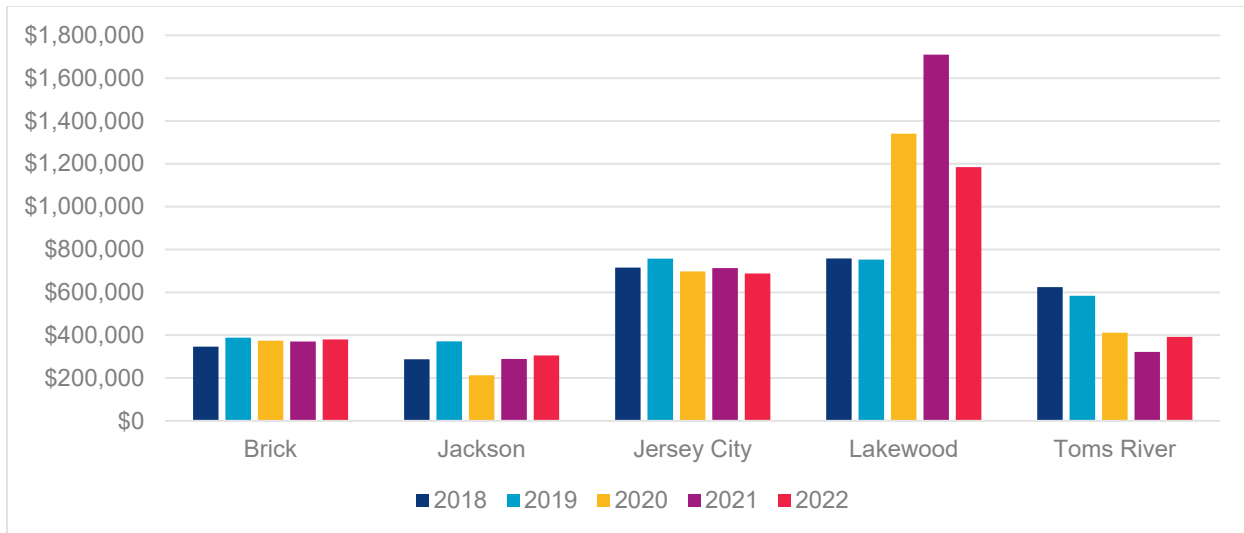
FIGURE 7: LEGAL EXPENSE BY DISTRICT PER PUPIL BY YEAR
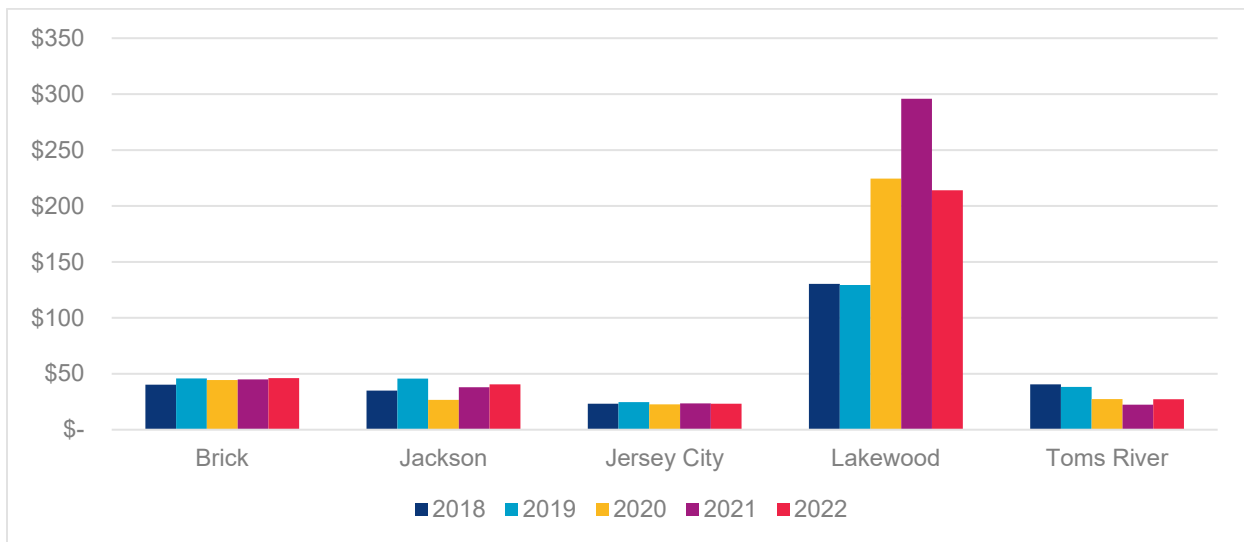
Note. Retrieved from "Budgetary Comparison Schedule from Exhibit C-1 in the ACFR" provided by Lakewood Public School District

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[39] Only Lakewood public school student numbers were included in this analysis.

FIGURE 8: TOTAL LEGAL EXPENSE BY DISTRICT BY YEAR

Note. Retrieved from "Budgetary Comparison Schedule from Exhibit C-1 in the ACFR" provided by Lakewood Public School District

State Monitor

The District currently has a state monitor assigned by the State of New Jersey. A District qualifies for a monitor subsequent to specific fiscal characteristics as specified in *N.J.S.A.*18A:7A-55. During PCG's review, there was a transition from one state monitor to another. In PCG's interviews, both state monitors were empathetic to the District and its financial issues. The first monitor shared that under his authority he can overturn any decision that the Board of Education and Superintendent make, but he had not had to do so. He saw his job as helping to develop the decision-making capacity of the District on their own. The current state monitor is a former Business Administrator for the District and has extensive knowledge of Lakewood's financial situation. His former relationship with the District may present some barriers to the impartiality required for his current position.

Culture of Low Expectations

PCG observed a districtwide culture of low expectations for students in interviews, focus groups, survey responses, and classroom observations. Comments were made by nearly all levels of staff that their job is more difficult because of students' backgrounds, economic status, or attitude. Rather than having a culture of Academic Optimism, many staff believe that poverty or lack of English proficiency contribute to the students' low academic performance, poor attendance, lack of motivation, and an overall poor attitude.

Research on an educational construct, Academic Optimism, by Dr. Wayne Hoy and his colleagues suggest that connecting three important characteristics of schools can produce a potent and positive influence on academic achievement, even in the face of low socioeconomic status, previous performance, and other demographic variables such as school size or minority enrollment.[40]

Hoy's definition of "academic optimism" is grounded in social cognitive theory and positive psychology. It embraces the following characteristics:
- *Academic emphasis* – the extent to which a school is driven by a belief system that includes high expectations for students to achieve academically.
- *Collective efficacy of the faculty* – the belief that the faculty can make a positive difference in student learning.

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[40] Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). *Academic optimism of schools: A force for student achievement.* Working Paper – The Ohio State University.

- *Faculty's trust in parents and students* – faculty, administrators, parents, and students cooperate to improve student learning; trust and cooperation among parents, teachers and students influence student attendance, persistent learning, and faculty experimentation with new practices.

A school with high "academic optimism" believes that faculty can make a difference, students can learn, and achieve high levels of academic performance. Findings from research showed that there was a significant positive relationship between teachers' academic optimism and students' academic achievement.[41]

The lack of a culture of Academic Optimism is evidenced through the sample statements made in focus groups and in open ended staff survey responses as follows:[42]

- *The low academic ability of students makes it challenging to have higher-level conversations and ask thought-producing questions. Students need to have more trips and experiences outside of the classroom to enhance their understanding and depth of learning.*
- *A great portion of the student population comes from low-income families which can hinder students from being ready to learn.*
- *For me, the financial needs of families play a huge impact on the performance of their children at school. Many students are late to school, miss school, and are dealing with family, cultural, financial, and living conditions issues that they bring to school or interfere with their learning. Making money for them is more important than getting a high school diploma.*
- *Many students struggle because of their bilingual background, sometimes the language is what hinders their potential.*
- *The amount of stress that is put on teachers and the unrealistic expectations for students to perform at levels that are beyond their capabilities when they are struggling English Language Learners.*
- *The language barrier with parents and their lack of accountability at home is a challenge.*
- *Many students have an apathetic attitude toward school because many of them are exhausted from working jobs until very late.*
- *The cultural diversity makes it difficult to teach to the student's needs. The students are all on different levels depending on where they came from.*

Staff Wellness and Morale

Teaching staff describe a challenging environment characterized by being overloaded and a perception of understaffed conditions. They noted that meeting the diverse needs of students is daunting, and the work can be defeating and deflating. Despite these challenges, several shared their commitment to students remains a driving force that keeps teachers committed.

Across the District, many believe preschool teachers receive more emotional support than their counterparts in other grades, fostering strong relationships with master teachers. However, it is believed the level of support is not consistent across grade levels, as instructional coaches are less accessible for other teachers. Teaching staff also shared concerns about having a lack of time, especially for basic activities like lunch.

Several teachers cite frequent changes and new rules from the District which create confusion and inconsistency, contributing to the overall sense of overwhelm. Teachers noted they feel more appreciated by their colleagues than by administrators, and instances of unresponsiveness or unclear communication from the District contribute to a perception of inadequate support.

Despite challenges, teachers noted they work collaboratively and maintain constant communication, contributing to a positive aspect of teamwork. However, almost all teachers noted the fear of job security consequences for not strictly adhering to pacing guides adds to the stress.

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[41] Ibid
[42] Survey open response data are direct quotes. Focus groups quotes may have been paraphrased during notetaking.

Communications and Community Relations

Effective communication is a key strategy for superintendents as they lead their districts. District communication was one of the most identified deficiencies within the District both internally and externally. Effective strategies for communicating with stakeholders include using multiple communication methods and tools, individualizing communications to families, and ensuring communications are accessible to culturally and linguistically diverse stakeholders.[43] District and school staff may need to take additional steps to enable better communication with culturally and linguistically diverse families.

The only group that believed the District was doing well in communication with all stakeholder groups was the Lakewood School Board. Most other focus groups and survey results shared that the lack of communication from the central office as well as the inability to communicate with their culturally diverse and multi-lingual students and their families are barriers to successful outcomes.

Communication with Internal Staff

Communication with internal staff was repeatedly cited as an area of weakness across all stakeholder groups including school administrators, teachers, professional staff, paraeducators, and support staff.

Reported communication gaps examples include:
- In Summer 2023, there was the transfer of over 300 staff by the central office and the reorganization of grade levels at the middle school and some elementary schools. The changes reportedly were communicated only weeks before the start of the school year. Lack of sufficient communication was cited as an issue by District staff, school-based administrators, school-based staff, and parents. The Superintendent confirmed she was not fully forthcoming or transparent about the rationale for this move, so as to not raise staff concerns about predicted student enrollment declines in the coming years.
- School administrators reported frequent administrative reassignments to new buildings with limited notice or rationale, and with the communication of the reassignment most frequently occurring only via written communication.
- Several long-standing afterschool programs were cut or reduced for the 2023-2024 school year. There was significant speculation and conflicting information provided to PCG during focus groups on the rationale for these cuts.
- School administrators reported receiving information related to policy or personnel changes at the same time as their staff, with no background context or information that would allow them to ease staff concerns.

Communication with Students and Families

There are several structures in place to support communication within the District, including the Family Enrollment Office. There are also parent liaisons in each building to provide outreach and translation apps available to parents during a phone conversation. Schools reported they communicate to parents through newsletters from librarian and principals, home visits if warranted, emails, flyers, and letters.

The website was cited in focus groups and interviews as an important way of communication, including the Board agenda and school activities. On the District website, under the Information tab, there is access to Google translate to change the text to Spanish on the website. Yet, when looking at the documents under each heading, only 15% of the documents are in Spanish. Most are PDFs that were only written in English, so do not function with Google Translate.

Translation services were referenced frequently as a challenge area for the District. Multiple focus group members mentioned the limited number of translators in Lakewood. Both students and staff focus group participants talked about students having to serve as translators for parent conferences and teacher visits.

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[43] Kornegay, S. (2023, November 14). *Five Essential Skills for Superintendents.* NEAG School of Education. University of Connecticut. https://today.uconn.edu/2023/11/five-essential-skills-for-school-superintendents/

There are Spanish speakers in both the Family Enrollment Office and the Transportation Office who are available and accessible to Spanish-speaking families.

According to data provided by the District, approximately 5% of all staff speak Spanish. 77.2% of students report Spanish as their home language, making the need for translation services in the District high.

Organizational Management

An effective superintendent must have knowledge of best practices regarding management of the District including organization, operations, and resources for a safe, efficient, and effective learning environment. District leaders must have the skills to manage resources that keep the focus on improving student outcomes. Organizational management also includes knowing the importance of creating systems that focus school staff and other resources on common goals and creating processes that facilitate effective teaching and learning.[44]

Strategic Plan
There is no District strategic plan that guides decision-making.

Annual Goals
The Lakewood Superintendent presented District annual goals to the School Board in August 2023. An annual goals PowerPoint is provided in both English and Spanish. Goals are:

- Goal 1: Improve Student Achievement
- Goal 2: Student Wellness
- Goal 3: Student & Staff Attendance
- Goal 4: Fiscal Stability
- Goal 5: Strengthen Community Relations
- Goal 6: Safety & Security
- Goal 7: Increase the Graduation Rate & Decrease the Dropout Rate

Per PCG's review of the *Lakewood School District's Goals for the 2023-2024 School Year* PowerPoint,[45] it was difficult to gain a clear picture of District key priorities. The PowerPoint took a 'laundry list approach' to the communication of annual goals. Furthermore, there were no metrics presented to the Board as to how the District would measure the goals and actions that would be taken if the District was not showing growth in meeting the goals.

TABLE 11: ANALYSIS OF *LAKEWOOD SCHOOL DISTRICT'S GOALS FOR 2023-2024 SCHOOL YEAR POWERPOINT*

Annual Goals	Analysis
Goal 1: Student Achievement	- Consisted of a goal statement that included, *"The Lakewood School District will improve academic achievement for all students by ensuring the delivery of high-quality instruction in all areas through the implementation of the New Jersey Student Learning Standards."* - The slide deck had 44 slides in support of this goal. - Slides began with curricular and instructional content such as Tier 1 and Tier 2 instruction, PLCs, Science of Reading, and Math curriculum, but also shared information about parking lot pavement, high school library renovation, band equipment, auditorium renovation, high school track completion, new bleachers, etc.

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[44] *Educational Leadership Program Standards*. (2011). National Policy Board for Educational Administration. https://www.npbea.org/wp-content/uploads/2017/09/ELCC-District-Level-Standards-2011.pdf
[45] *Lakewood Public School District's Goals for the 2023-2024 School Year. (*2023) Lakewood Public School District website.

	• The majority of these slides did not align to the goal statement of "the delivery of high-quality instruction in all areas through the implementation of the NJ Learning Standards." • Most of the slides not related to facilities upgrades were duplicates from the 2022-2023 annual goals slide deck.
Goal 2: Student Wellness	• Slides included detailed information about social-emotional and mental health offering the District is providing to students.
Goal 3: Student and Staff Attendance	• Duplicate, single slide from the 2022-2023 presentation.
Goal 4: Fiscal Stability to Support Student Learning and Facilities	• Single slide • The slide included their goal statement, *"The Lakewood School District will ensure that the budget provides for the achievement of all students in the District while maintaining fiscal responsibility. The maintenance of safe, healthy and clean facilities will reflect high standards for student learning and foster District pride."* • The three strategies for this goal are: 1) Prioritize resources to support academic programs, student achievement and effective staff; 2) Meet applicable state and federal audit standards and 3) Maintain and improve school facilities to enhance instruction, ensure safety and protect the investment of taxpayers. • There is no mention of goals or strategies to lower the budget or cut spending as observed in the documentation of comparable Districts. • Slide is a duplicate from the 2022-2023 presentation.
Goal 5: Strengthen Community Relations	• Duplicate, single slide from the 2022-2023 presentation.
Goal 6: Safety & Security	• Slides include new safety procedures such as a Weapons Detection System, color-coded hallways, and classroom key daily check-out procedures • Slide includes a new See Something, Say Something reporting system that is offered in English and Spanish

Goal 7: Increase the Graduation Rate & Decrease the Dropout Rate	• Slide includes the same strategies as the 2022-2023 presentation but did not include trend data that had been previously provided.
	• Strategies are vague and not tied to outcomes. They are:
	   o Offering Engaging Lessons
	   o The implementation of new courses and programs
	   o Close monitoring of students
	   o Meeting the needs of individual students
	   o Improving the Climate and Culture
	   o Improved family support

Note. Retrieved from " *Lakewood Public School District's Goals for the 2023-2024 School Year",* provided by Lakewood Public School District.

Safety and Security

School Safety

School safety is multifaceted in Lakewood Public Schools. The District has a large security staff represented at each building. At the high school students are "wanded" before entering the building while metal detectors are used in other buildings. All students from kindergarten through high school are required to use clear backpacks. High school students noted that the clear backpacks are not that strong and often have to be replaced as they crack or tear, which is a hardship for many families. There are also security cameras placed in all schools as well as ID checks by security staff when entering any school facility. In most schools,

especially elementary schools, the security check is typically done by the school secretaries after being let into the school. In Lakewood, the school office is the third stop. The first stop is the metal detector, and the second stop is the security desk.

Security staff reported that there is top notch security within the District, and it is very safe. There are $200k scanning devices that are state of the art. No one is in the building without an armed security guard. In addition, a new advanced threat detection service and tool was purchased by the District to monitor at-risk students. The system includes risk of assessment of self-harm, depression, grooming, sexual content, bullying and school violence. Anything a student types into a District chrome book or computer is tracked.

However, with all the security in place some students commented that security checks make one feel less trusted. One student high school student recalled something that happened years ago in Lakewood is the reason there is now so much security. Staff focus group participants stated that they are told to call security and then an administrator if a behavioral issue is escalating in their classroom. Teachers also reported that there is a lot of security within their schools, but some of the security staff are rough on kids. Staff suggested that more de-escalation training for both teachers and security staff would be beneficial.
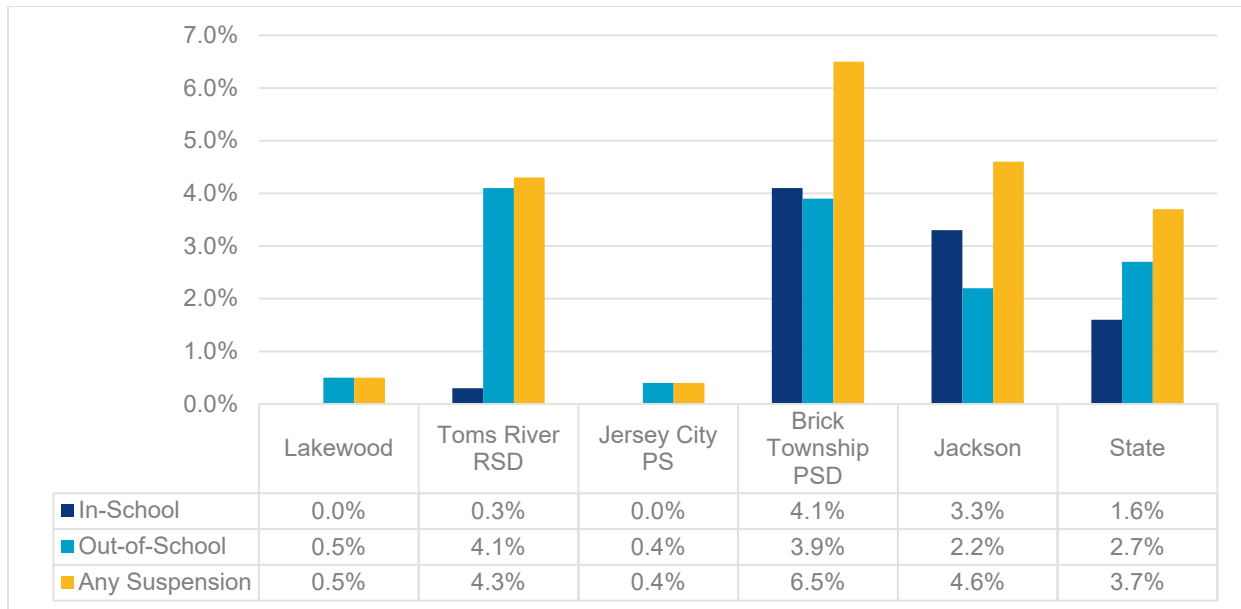
Discipline

During the 2021-2022 school year, the Lakewood Public School District implemented an Academic & Behavioral Intervention Program for students in Kindergarten through grade 12.[46] The goal of the program is to keep every student in school, every day. This approach, therefore, led to eliminating the traditional suspension program within the District. Lakewood's Academic & Behavioral Intervention Program states that sending students home as a punitive measure does not address or solve the root problem. Students need the opportunity to learn and grow from their behavior. In addition to a new policy, staff were assigned to the intervention program including two substance abuse counselors (SAC); bilingual social worker; Board Certified Behavior Analyst (BCBA); behavior therapy associates (Psychologist/BCBA-D); guidance counselors; and teachers. While receiving their academic and behavioral interventions, students will continue their academic program/schedule, and students with an IEP will continue to receive all of their mandated services. Figure 9 depicts suspension data of all four comparable schools as well as the state. With the new Academic and Behavioral Intervention Program, Lakewood has seen the suspension rates drop compared with other school districts.

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[46] *Academic & Behavioral Supports/Code-of-Conduct*. (2021-2022). Lakewood Public School District. https://www.lakewoodpiners.org

FIGURE 9: COMPARATIVE SUSPENSION DATA BY DISTRICT (2022)

	Lakewood	Toms River RSD	Jersey City PS	Brick Township PSD	Jackson	State
■ In-School	0.0%	0.3%	0.0%	4.1%	3.3%	1.6%
■ Out-of-School	0.5%	4.1%	0.4%	3.9%	2.2%	2.7%
■ Any Suspension	0.5%	4.3%	0.4%	6.5%	4.6%	3.7%

Note. Retrieved from "NJ Performance Reports by NJDOE", 2024, (https://rc.doe.state.nj.us/)

Although the student suspension rate has been lowered, the new discipline program has not been well received in schools. Teachers stated the perception that student discipline issues are growing since there are no "real consequences" for negative behavior. High school teachers perceive that there are more fights than ever before. Students also say that bathrooms can feel unsafe at times, and they see students vaping and smoking during the school day. PCG did not observe any discipline concerns during school observations and found schools to be orderly and calm.

School Configuration

In the spring/summer of 2023, the District changed the configuration of schools for elementary and middle schools. The grade configuration consisted of moving hundreds of students and staff with little notice or explanation as to why the decision was made. There was no public discussion at the School Board meetings, or much notice provided. Principals shared that they did not have time to let parents know and plan for some student/family activities to aid in the transition. School leaders were given very little notice, in one instance a day to pack up and move. Parents shared with their schools that they did not understand why the decision was made, but that it was a very anxious time for their family. Teachers were told they were moving to a new school and for some a new grade level through an email from District administration. Furthermore, maintenance and facilities staff were not notified of the reconfigurations of almost every school, which meant added hours and manpower needed to complete the move before the fall opening of school, which was an unanticipated additional cost to their budget.

In addition to the lack of notice for students and staff, the new grade-span configurations have added more school transitions for students. The grade-span configuration of a school district determines the number of school-to-school transitions students experience. Research suggests that multiple school transitions may have an impact on students' sense of belonging, the continuity of curriculum and instruction, and student academic achievement.[47] **Table 12** shows the grade configuration of each school in SY 2022-2023 and SY 2023-2024.

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[47] Anderson, P. F. (2012). *Grade-Span Configurations and School to School Transitions*. Florham Park, NJ. College of St. Elizabeths. https://eric.ed.gov/?id=ED549733

TABLE 12: GRADE CONFIGURATION FOR LAKEWOOD PUBLIC SCHOOL DISTRICT

School	SY 2022-2023	Enrollment	SY 2023-2024	Enrollment
LECC (Early Childhood Center) *Building Capacity: N/A*	Pre-K to Kindergarten	499	Pre-K to Kindergarten	268
Piner Elementary School *Building Capacity: N/A*	Pre-K to Grade 2	503	Pre-K to Kindergarten	391
Spruce Street School *Building Capacity: 799*	Pre-K to Grade 1	448	Grade 1 (only)	258
Clifton Avenue Grade School *Building Capacity: 782*	Grade 2 to Grade 5	402	Grade 2 to Grade 6	492
Oak Street School *Building Capacity: 799*	Grade 2 to Grade 5	608	Grade 2 to Grade 6	652
Ella G. Clarke School *Building Capacity: 432*	Grade 3 to Grade 5	295	Grade 3 to Grade 6	347
Lakewood Middle School *Building Capacity: 537*	Grade 6 to Grade 8	1,101	Grade 7 to Grade 8	586
Lakewood High School *Building Capacity: 714*	Grade 9 to Grade 12	1,607	Grade 9 to Grade 12	1,335

Note. Data are from "2022-2023 Lakewood Grade Configuration Data" extracted from Lakewood Public School District NJ Smart Data and "2023-2024 Lakewood Grade Configuration Data" extracted from Lakewood Public School District Enrollment Numbers (January, 2024). Building capacity data are from Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021.

There are no changes at Lakewood High School or the Lakewood Early Childhood Center (LECC) for the current school year. However, every other District school changed grade-span configurations. Both Piner Elementary School and Spruce Street Schools have limited elementary grade levels. For a student entering kindergarten at Piner Elementary School, it's possible, under the current configuration, to attend five Lakewood schools throughout their academic career. The schools include:

Schools with a small number of grade levels such as Spruce Street School have an additional challenge for staff, students, and families to overcome. Since Spruce Street School consists of only one grade level, each year the entire school will have a new group of young students who are unfamiliar with the school. There are no older students to act as role models for the first-grade students, and relationships with families have not been established. The staff has a short period of time to create a sense of belonging for students and families that will lead to students feeling safe and working towards academic success. Additionally, they also must spend the last part of the school year preparing for another transition (their third in three years) to attend a different elementary school that includes second grade. Through open-ended survey comments and in focus groups staff and families shared their concerns:

- The switch of schools was very sudden and did not allow families time to plan for the transition.
- Parents of younger students reported transition to be emotionally challenging to their children. It was reported feeling as the if the District *"was not considering the students and what they had to go through."*
- Students left at the end of the school year without prior discussion about restructuring.
- Schools experienced staff turnover due to restructuring and reconfiguring grade levels.
- Due to the reconfiguration, there now are families with children in four different elementary schools. This creates significant logistical challenges for families and may hinder parental involvement in each school.

Principals reported they designed a plan to help acclimate staff including reaching out to staff immediately and personally welcome them to the building; providing materials for teachers to read and become familiar with the goals and objectives; and facilitating grade-level meetings with the new teams to ensure alignment.

Building capacity data in **Table 12** are based on the data reported in the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021. Based on these numbers, it appears that the elementary schools all have substantial excess capacity, while the middle and high schools are over capacity. The middle school cafeteria was expanded prior to the start of the 2023-2024 school year, using $2.6 million in ESSER funds, to help with capacity concerns. PCG submitted a request for the building capacity numbers used by the District. The Superintendent shared that she was not aware if these numbers existed, and building capacity needs were based on personal observation.

Human Resources Management

To ensure staff are valued and supported, effective superintendents plan and direct a comprehensive human resources program, including recruitment, selection, wage and salary administration, employee relations and collective bargaining.

Recruitment and Retention

Information gathered from interviews and focus groups raised the following themes on recruitment and retention. During the 2022-2023 school year, 133 staff exited the District, resulting in a retention rate of 93%. This rate aligns to the average statewide district retention rate, which was 92.4% in 2020-2021.[48]

The Lakewood Public School District reportedly struggles to hire staff to fill all their vacancies each year. Finding and retaining suitable staff is a significant area for improvement. Lack of competitive salaries with neighboring districts was cited as a key barrier. Critical staffing needs, such as Learning Disabilities Teaching Consultants (LDTC) and bilingual school psychologists, was cited as a particular challenge due to the limited pool of qualified candidates.

FIGURE 10: AVERAGE SALARY BY YEARS FOR LAKEWOOD PUBLIC SCHOOL DISTRICT (2022)
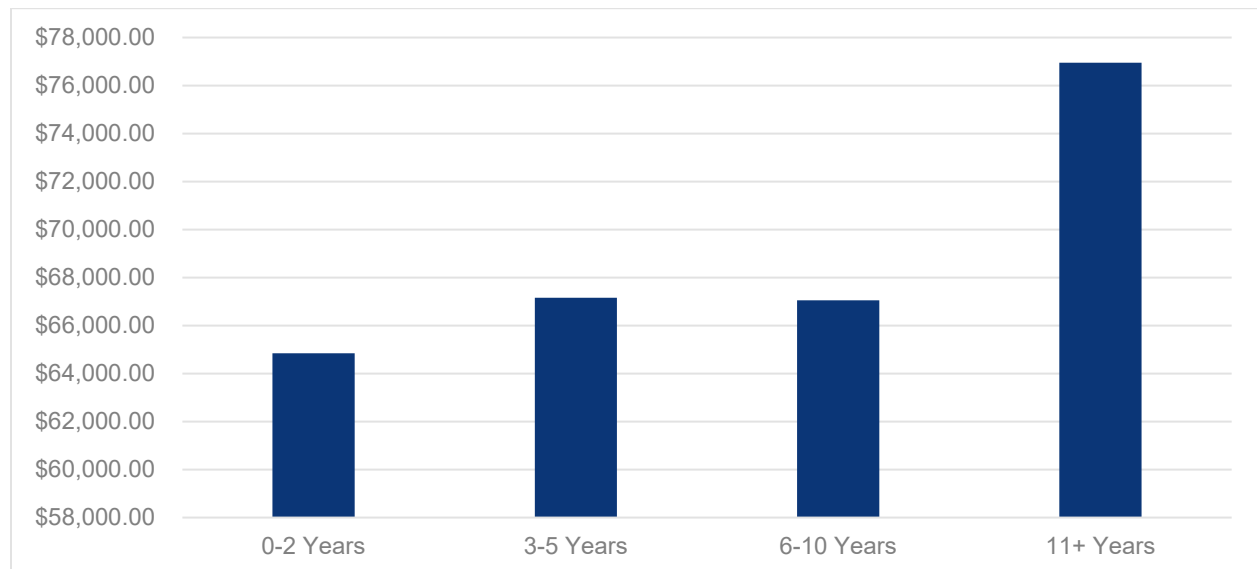
Note. Retrieved from "Average Salary By Years, 2022" provided by New Jersey Data Extract

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[48] *Initial Recommendations from Members of the Task Force on Public School Staff Shortages In New Jersey*. (2023, February). Task Force Report. https://www.nj.gov/education/docs/TaskForceReport.pdf

FIGURE 11: AVERAGE SALARY BY ROLE (2022)
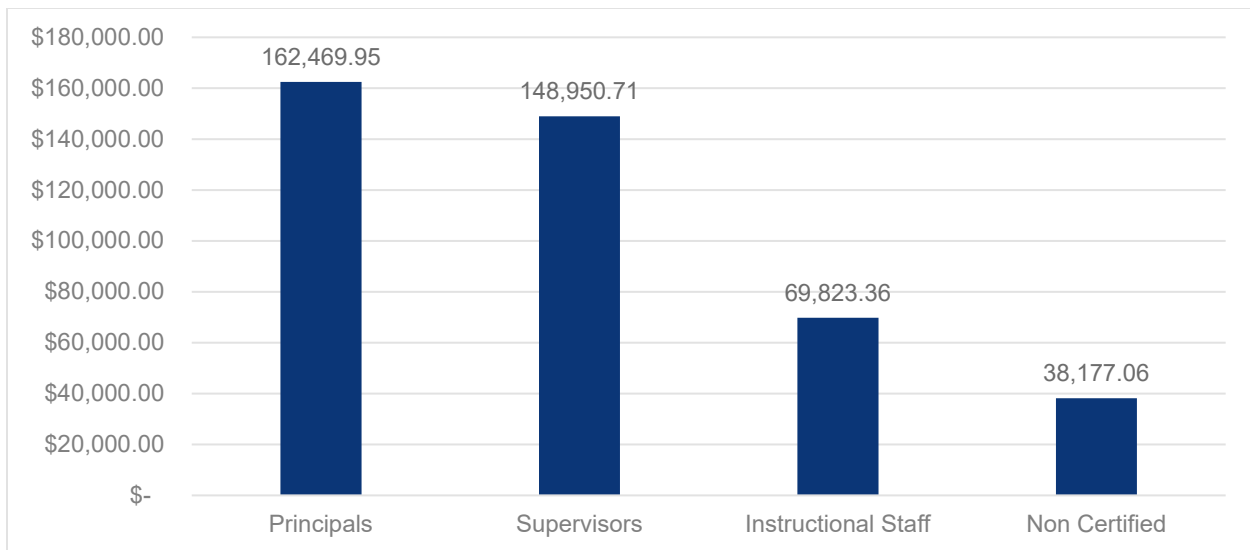
*Note.* Retrieved from "Average Salary by Role, 2022" provided by New Jersey Data Extract

- The average salary for principals is *higher than* the state average of $137,250.
- The average salary for supervisors is *higher than* the state average salary of $135,133.
- The average teacher salary is *lower than* the state average of $77,619.
- The Superintendent also receives a salary *higher than* the state average of $185,658.
- The Superintendent's salary in 2023-2024 is $238,000, an increase of 42% since 2017.

Some feel the inconsistency in staff and high turnover rates, especially among counselors, pose challenges. While some teachers leave due to relocation, turnover in middle and high schools remains a concern. There is a desire for more training, especially among new hires. Staff shared concerns about changes in leadership within buildings, and how this creates instability that could potentially impact retention. In addition, they noted a re-shuffling of teachers between buildings, annually, and its impact on stability and a desire to stay in the District.

There appears to be a high rate of non-renewals in the District. 77 teacher contracts have been non-renewed in the past five years. The Superintendent shared that they do not always get the best candidates, so they have to non-renew more than other Districts. Additionally, based on interviews and focus groups, there seems to be a lack of a traditional system for non-renewing staff. Based on multiple accounts, unlike many Districts, non-renewal final decisions are made by District staff rather than school-based staff. Rather, the curriculum supervisors meet with the Superintendent to make the final decisions based on the walkthrough data they generate. Principals said they want to have a more active role and have shared that with the Superintendent but there have been no changes made.

FIGURE 12: NUMBER OF TEACHERS NON-RENEWED BY YEAR
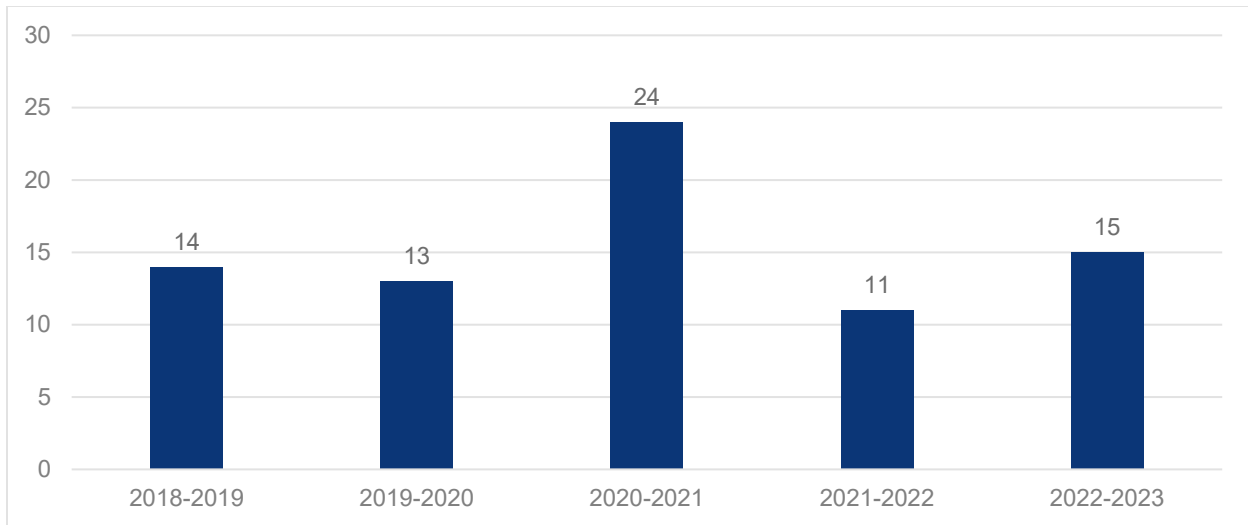
Note: Data are from "Number of teachers non-renewed each year for the past five years, Nov 2023" provided by Lakewood Public School District

The promotion and training of paraeducators was also referenced as a source of pride, emphasizing their importance in the educational system. Yet, some staff reported they believe the District may be considering a reduction in paraeducators, raising concerns. Some staff also believe there are disparities in paraeducator salaries also need attention, with some new hires earning more than experienced counterparts.

The teacher and administrator transfer process is atypical. Last spring many leaders were transferred to different schools before the end of the school year. Principals were told that they would be moving with little time to share the decision with their staff, students, or families. Additionally, it was disconcerting to staff as well, almost 300, who were transferred at the end of the year without a discussion with the Superintendent, but rather an email with their transfer notification. Staff were surprised by the decision and had little recourse except to move to a new school and for many to a new grade level.

CURRICULUM AND INSTRUCTION

This chapter reviews the curriculum and instruction practices of the Lakewood Public School District and covers the following analysis areas:

- District curriculum
- Professional learning
- Multi-tiered Systems of Supports
- Multilingual Learners
- Access to college and career coursework
- Classroom observations analysis
- Assessment practices
- Student outcomes

SUMMARY

- **Curriculum Development.** Lakewood uses a significant amount of material that is developed internally. Development is controlled by curriculum supervisors, requires frequent revisions, and represents a large expense to the District. Without an Assistant Superintendent whose responsibility would be oversight of the curriculum and its supervisors, each curriculum supervisor can make decisions about changes to their content area without keeping a balance with the other content areas.
- **Curriculum Differentiation.** The intense focus on pacing guides, instructional frameworks, and lesson scripts leaves little room for differentiation in the classrooms. Teachers reported limited time to pause to ensure mastery.
- **Walkthroughs and Observations.** The number of required walkthroughs and observations being completed by curriculum supervisors, instructional coaches, school administrators and the Superintendent are excessive. Required administrative team walkthroughs alone average 200-300 per month occurring within each school. This count does not include walkthroughs by curriculum supervisors or the required formal observation process.
- **Multi-Tiered Systems of Supports (MTSS).** While Lakewood appears to have an intentional framework and intervention resources to support students with their academic and behavioral needs, there seem to be gaps in school-based staff's understanding of them, a consistent application of them across schools and classrooms, and clear documentation about expectations.
- **Career Pathways.** High school student participation in vocational education coursework is strong, but students are not engaged in career pathways programs offered by the District. Only five students participated in a full-time Career Academy Pathway in the 2022-2023 school year across three Pathway programs.
- **Advanced Placement (AP).** Student participation in and exam passage rates for Advanced Placement courses are low. Of the students taking AP exams in 2022-2023 for courses offered at Lakewood High School, more than half of the students did not pass in all courses except for Spanish Language and Culture. No students who took the AP US History course passed.
- **Student Engagement.** Students were not engaged in instruction as active learners during PCG observations. There was limited classroom discussion. At the upper elementary through high school levels, almost all observations were of students working independently on assignments. Students were observed to be compliant and orderly.
- **Instructional Practices.** Most instruction observed by PCG was teacher-directed, and classroom lesson structure was predictable. Students were not asked to apply higher level thinking skills such as application, analysis, or evaluation.
- **Graduation/Dropout rates.** Graduation rates are lower than the state average and comparable districts; dropout rates are higher.

DISTRICT CURRICULUM

PCG conducted a review of Lakewood's curriculum. The review focused on the English Language Arts (ELA) and Mathematics curriculum as they are the most tested content areas in the State of New Jersey. Documents used for the curriculum review consisted of textbooks currently adopted by the District, available pacing guides, scripted lessons, unit plans, and other curricular material made accessible.

Curriculum Development

Much of the curriculum is developed by the curriculum supervisors and instructional coaches within the District.

In ELA/literacy, at the early elementary level there are some purchased materials such as the Letterland or ReadBright programs focused on the Science of Reading. Beginning in Grade 3, the curriculum adds an older version (2013) of the Core Knowledge Reading Program for elementary grades. At the secondary level the District has introduced CommonLit 360, a subscription based digital literacy program, that is supplemented by older versions (2015) of Houghton Mifflin Harcourt (HMH) textbooks. Commonlit is a digital literacy program. All grade levels supplement the curriculum with additional texts such as decodable readers or novels are purchased for each grade level. These decisions are made at the curriculum supervisor level.

At the elementary and middle school levels, math curriculum is solely developed by the curriculum supervisors and the instructional coaches. There are teacher guides and student workbooks/worksheets created within the District for all grade levels. Beginning at the high school level, more traditional high school math textbooks are used.

Table 13 lists of all ELA and Math Resources used within the Lakewood classrooms.

TABLE 13: ELA AND MATH CURRICULUM MATERIALS- K-12

GRADES	ELA RESOURCES	MATH RESOURCES
Kindergarten	Letterland Copyright 2015 Letterland Phonics Workbooks Copyright 2022 ReadBright Teacher's Guides, Student Workbook, Homework Book, Handwriting Book, Decodable Texts (Copyright 2017- 2023)	K Math Ready Classroom Teacher Guide & Student Workbook 2021 iReady Intervention Program
Grade 1	Letterland Teacher Manual Copyright 2015 ReadBright Teacher's Guides & Student Materials Copyright 2023	Grade 1 Math Ready Classroom Teacher Guide & Student Workbook 2021 iReady Intervention Program
Grade 2	Letterland Teacher Manual (Copyright 2015) Letterland Phonics Workbooks (Copyright 2022)	Grade 2 Math Teacher Guide & Student Workbook iReady Intervention Program
Grade 3	Core Knowledge Language Arts - 2013 Letterland Teacher Manual	Grade 3 Math Teacher Guide & Student Workbook iReady Intervention Program
Grade 4	Core Knowledge Language Arts 2013	Grade 4 Math Teacher Guide & Student Workbook iReady Intervention Program
Grade 5	Core Knowledge Language Arts 2013	Grade 5 Math Teacher Guide & Student Workbook iReady Intervention Program
Grade 6	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription	Grade 6 Math Teacher Guide & Student Workbook iReady Intervention Program
Grade 7	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription	Grade 7 Math Teacher Guide iReady Intervention Program

Grade 8	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription	Grade 8 Math Teacher Guide iReady Intervention Progam
Grade 9	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription Textbook: HMH Collections, Grade 9 – 2015	Algebra 1, Big Ideas Learning, 2022
Grade 10	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription Textbook: HMH Collections, Grade 10 – 2015	Reveal Geometry, McGraw Hill, 2020
Grade 11	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription Textbook: HMH Collections, Grade 11 – 2015	Algebra 2, Big Ideas Learning, 2022
Grade 12	CommonLit Texts & Resources, 360 Curriculum, 3-year subscription Textbook: HMH Collections, Grade 12 - 2015	The Practice of Statistics, BFW, 2020 A Graphical Approach to PreCalculus with Limits, Pearson, 2019

Note. Retrieved from "2023-2024 Textbook Inventory, Kindergarten - Grade 12" provided by Lakewood Public School District

Curriculum Analysis

K-2 ELA Analysis

- The ELA curriculum at the K-2 level is highly focused on the Science of Reading (SoR). Both Letterland and ReadBright follow the tenants of the SoR and focus on Foundational Reading skills and targeted instruction.
- K-2 classrooms are well resourced with material that supports the SoR including decodable books, sound walls, etc.
- Resources are standardized for each classroom. There are similar anchor charts, wall posters, and support materials for each grade level.
- Classroom schedules show a 2-hour literacy block that includes foundational skills, targeted instruction, language and comprehension, and writing, which occurs in an additional 40-minute writing block. The classroom schedules and focus on reading skill development align with current best practices in reading.

3-5 ELA Analysis

- Third grade is a transitional year. There is a shift that begins from using Letterland as a key component of the curriculum to materials with more of a focus on building comprehension skills using the Core Knowledge reading textbook, with novels to supplement the instruction.
- Core Knowledge with its partnership with Amplify is a well-known resource that has a heavy focus on non-fiction text.
- Lakewood is not using the newest version of Core Knowledge ELA, but rather an older version published in 2013, making the textbook eleven years old.
- iReady is used support math intervention within the classroom.
- EdReports[49] rated a 2015 version of the Core Knowledge textbook 'Meets Expectations'. It is difficult to determine if the 2013 version would receive the same rating using the same measurements.
- In addition to the Core Knowledge series, teachers incorporate novels at each grade level to teach the standards as well. There were teacher concerns that some of the non-fiction stories included in the reading textbook were not relatable to their students. Topics range from the Middle Ages to Astronomy to Animals.

Secondary ELA Curriculum

- Secondary ELA curriculum has been transitioning to CommonLit 360 over the past two years.[50]

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[49] *Ed Reports.* (n.d.). Core Knowledge ELA.
[50] *Common Lit 360*, *Program Guide.* (n.d.) Commonlit. https://www.commonlit.org/en

- This is the first year for some of the high school classes to adopt the program. The program is digital and there are some free resources as well as a subscription-based service with resources. The District has purchased a 3-year license for the program.
- In each unit, students examine a series of texts that focus on a central theme or topic. Throughout the unit, lessons and activities support students in developing a core understanding of the knowledge and skills presented. At the end of each unit, students complete a culminating task which serves as the unit's summative assessment.
- During the focus groups, participants shared that the transition to CommonLit 360 for both students and staff has been difficult. There is a lot of content in each lesson and the reading level is a challenge for some of their students who are English Learners and/or below grade level in reading.
- All ELA classes at the middle school are 80 minutes long. At the high school level. English 1 is a double block lasting 80 minutes. All other English classes, with the exception of AP English, are a single 40-minute period. AP English is a double block that lasts 80 minutes.

Elementary and Middle School Math

- Math curricular materials in Grades K-8 have been fully designed and developed by the math curriculum supervisor and the instructional coaches. The teacher's guide, lesson guide PowerPoint, and the worksheets are provided to the teachers each year.
- There are manipulative materials purchased as well for classrooms use as part of their instruction.
- There are approximately 80 minutes allocated for math instruction at the elementary level.
- In the middle school, there are two periods designated for math which is approximately 80 minutes.
- Focus group participants questioned how well the lessons and materials are aligned to the standards, even if there is a standard referenced in the pacing guide. There were more concerns regarding the math curriculum by teachers than the reading curriculum at the elementary level.

Table 14 shows a sample of a second-grade math pacing guide, unit content, and NJSLS alignment.

TABLE 14: 2ND GRADE MATH PACING 2023-2024

Unit	Pacing	NJSLS
Beginning of the Year Assessment Unit 1 – Addition within 20 (12 activities) iReady Diagnostic – 1	September 7 – October 13 (25 days)	2.OA.2 2.MD.6
Unit 2 – Subtraction within 20 (6 activities)	October 16 – November 3 (15 days)	2.OA.2 2.MD.6
Unit 3 – Understanding Place Value to 1000 (19 activities)	November 6 – December 15 (26 days)	2.NBT.1 2.NBT.2 2.NBT.3 2.NBT.4 2.NBT.8
Unit 4 – Properties of Operations within 100: Addition and Missing Addend (6 activities)	December 18 – January 19 (17 days)	2.OA.1 2.NBT.5 2.NBT.6 2.NBT.9 2.MD.6
Unit 5 – Properties of Operations within 100: Subtraction and Comparison Word Problems (7 activities) iReady Diagnostic – 2	January 22 – February 13 (17 days)	2.OA.1 2.NBT.5 2.NBT.6 2.NBT.9 2.MD.6

Note. Retrieved from "Math Pacing Guides". Folder #38. Curriculum Map and/or Pacing Guide provided by Lakewood Public Schools.

High School Math
- The high school has a more traditional approach to using math textbooks to teach the content for Algebra I & II, Geometry, Statistics, and Pre-Calculus. The books have been recently purchased with copyrights ranging from 2020-2022.
- There is a pacing guide and scripts developed for teachers.[51]
- All math classes except for Algebra I are single blocks of 40 minutes. All Algebra I classes are double periods comprised of two 40-minute blocks.

Scripts and Pacing Guides

The Lakewood School District has made a strong commitment to the use of scripts and pacing guides at every grade level and within each content area. The scripts and pacing guides are created by the District, and updated at least annually, with the expectation they will be used by teachers whether the curriculum is created internally or by an outside company such as LetterLand or CommonLit 360.

Scripts are considered "soft scripts" by the administration and are intended to be used as a guide when delivering instruction. However, at the teacher level, the messaging around scripts varies depending on the school. During focus groups, it was shared that some teachers were given a poor evaluation from their curriculum supervisor's walkthrough if they not following the script verbatim. Focus group participants indicated there is the greatest emphasis on reading from scripts in grades K-2. Written guidance notes that teachers must be within ten days of the pacing guides expectations. There are three days set aside within the pacing guide to provide review instruction to support students who have not mastered previously taught skills or to catch up on instructional pacing.

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[51] *Math Pacing Guides*. (Retrieved, 2024). Folder #38. Curriculum Map and/or Pacing Guide. Lakewood Public Schools.

FIGURE 13: KINDERGARTEN ELA SCRIPT

Note. Retrieved from "Kindergarten Unit Plans, Soft Scripts & Materials". Folder #39. K-2 Instructional Resources, provided by Lakewood Public Schools.

The pacing guides and scripts are detailed documents that provide the teacher with the words they should say while teaching the lesson, an example of the student visuals, and examples of displays for the classroom. There are active links embedded in the document that provide examples of what the teacher and their students should produce. Each script is found in the unit plan, which also consists of a pacing guide, sample wall posters, anchor charts, assessments, and other curricular materials that should be used during the lessons. In addition to each lesson, a PowerPoint deck is provided to guide the instruction as well. Teachers show the slides on the SMART board and the slide deck is used as a student and teacher guide for each lesson. The PowerPoint decks are branded in similar ways and are expected to be used in each lesson. The District discourages adding material that is not developed by the District and included within the unit plan, pacing guide, script or PPT decks.

Instructional Framework

In addition to a unit pacing guide and lesson scripts, teachers receive an instructional framework for each lesson. The instructional framework provides an overview of how the lesson should be instructed as well as the amount of time needed for each part of the lesson. The instructional strategy used by Lakewood is the Gradual Release of Responsibility model (I do, We do, You do). Teachers need to stay within the pacing

guidelines of the lesson, which teachers who participated in focus groups repeatedly shared is very stressful.

The instructional framework provides detailed information regarding the lesson design. In **Figure 14,** the second-grade math lesson depicts an example of the instructional framework that teachers should use throughout the lesson. It is broken out into a problem of the day, teacher modeling (I do), guided practice, which is highlighted in the lesson (We do) and the independent practice/small group instruction (You do) component of the lesson. In addition, the instructional framework also includes a review section with number talk/mental math, and fact fluency. Lastly, there is a section to provide information on additional strategies for the EL students in the classroom. Lesson times are also part of the instructional framework to keep teachers on pace with the unit pacing guide.

FIGURE 14: INSTRUCTIONAL FRAMEWORK

Note. Retrieved from "Math Frameworks". Folder #38. Curriculum Map and/or Pacing Guide, provided by Lakewood Public Schools.

Curriculum Oversight

There is no Deputy or Assistant Superintendent in Lakewood for Curriculum and Instruction, unlike in the comparative Districts and typical practice. Curriculum development and oversight is the responsibility of the Curriculum Supervisors. The Curriculum Supervisors' responsibilities include curriculum development, pacing guide and script development, lesson PPTs, professional development including PLC content, supervision of instructional coaches, and instructional observations of all classroom teachers within their content area. There are six Curriculum Supervisors, and they are responsible for the following content areas:

- Supervisor of Math (K-12); Technology (K-12); and High School Instruction
- Supervisor of Science (K-12); Social Studies (K-12); and Assistant Principals

- Supervisor of Bilingual and ESL (K-12); and World Languages (K-12)
- Supervisor of ELA (3-12); and Fine Arts (K-12)
- Supervisor of Title I Instruction and ELA (K-2)
- Supervisor of School Counseling Services, Testing and Anti- Bullying Coordinator (more limited responsibilities than content coaches)

Curriculum supervisors and instructional coaches continuously review and edit pacing guides and 'tweak' curriculum to keep them updated regularly throughout the school year, therefore change is constant. Each summer changes are made in the curriculum, pacing guides, and scripts which means that teachers are relearning the curriculum and often familiarizing themselves with a new selection of novels. For elementary teachers, curriculum changes happen in both ELA/literacy as well as math. Without an Assistant Superintendent whose responsibility would be oversight of the curriculum and its supervisors, each curriculum supervisor can make decisions about changes to their content area without keeping a balance with the other content areas.

Teacher focus group participants reported that there are times they would like to make modifications in either the content or materials used in lessons based on the needs of their students. However, changes cannot be made to any part of the pacing guide or content unless the curriculum supervisor gives permission. The school principal does not have any oversight or decision-making authority over curriculum decisions.

To ensure that all the materials are being used as directed by the curriculum supervisors, there is significant teacher oversight. Each supervisor conducts classroom walkthroughs and observations each week for their content area. In addition, the instructional coaches, who are direct reports to the curriculum supervisors are in classrooms weekly supporting teachers but are required to report to curriculum supervisors when they observe struggling teachers. Furthermore, principals are directed by the Superintendent to complete 3-5 walkthroughs per day (15-25 per week). Assistant principals also must complete the same number of classroom walkthroughs and observations per day. At the end of each week, the walkthrough forms from both the principal and the assistant principals, which could be as many as 50-75, are sent to the Superintendent's office for review by the curriculum supervisors. Finally, every month the curriculum supervisors and the Superintendent conduct classroom walkthroughs together.

The walkthroughs are in addition to the teacher's evaluation program which is aligned to the Charlotte Danielson Framework for Teaching model.[52] The level of oversight is excessive and has had negative on school-based staff. During a walkthrough if a curriculum supervisor observes a teacher and the lesson is not aligned with the pacing guide or the teacher is using unapproved material, they are "written up" for the offense. One focus group participant said she makes her early elementary students throw away their breakfast if it gets past 8:03 in the morning as it will lead to her not meeting her lesson pacing goals and she never knows when someone will be in to observe her classroom.

Curriculum Costs

Lakewood uses the general fund and federal funds from title appropriations to pay for curriculum costs. Additionally, Lakewood used ESSER monies to make needed purchases of goods and services to support the schools. In the first part of the 2023-2024 fiscal year, Lakewood spent *$11,200,181* for materials, supplies, equipment, training, and staff time for curricular related items as recorded in the Lakewood School Board minutes.

Staff Survey & Focus Group Comments
Below are sample comments provided during focus groups and in the staff survey:

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[52] Danielson, C. (2022). *The Framework for Teaching*. The Danielson Group. https://danielsongroup.org/the-framework-for-teaching

CURRICULUM

- *There is pressure of keeping to the extensive curriculum, including the need for students to be doing a set amount of computer work per week.*
- *Lakewood doesn't use high quality curriculum to meet the needs of students. Curriculum created "in house" lacks the materials and resources to reach all students.*
- *The curriculum provided for math is awful, and not aligned properly with the state standards. The District curriculum is not aligned with the textbooks provided to us for math.*
- *The curriculum is not appropriate for the population of students I teach, specifically the ELA curriculum. It's heavy in content which provides a barrier for students to succeed and learn the standards. A full curriculum should be purchased from a company that writes and edits curriculum.*
- *The idea of implementing a writing curriculum that is effective in the development of writing skills is not a priority of the District. Writing is an interdisciplinary skill. Put that on top of the majority of students in the District are learning a second language, therefore grammar and linguistics of the English language is even more important to be learned and mastered. Young students, specifically K-2, need to learn and master grammar skills prior to learning to write paragraphs.*
- *We are not allowed to do fun activities within the math lessons that would actually connect the math to real world situations.*
- *We change a lot of programs each year, we switch programs too often. We need to pick a program and stick with it.*
- *The curriculum is overwhelming for teachers and students. We are never given enough time to successfully implement it. We need a lot more interventions to address gaps and deficits students are having in all areas but especially in phonemic awareness and phonics.*

PACING GUIDES AND SCRIPTS

- *A "one size fits all approach" when it comes to lesson structure is not conducive to all subject matter.*
- *The pacing guide must be followed exactly. The framework within the pacing guide must be followed word for word.*
- *The curriculum pacing is very fast paced. I would like to see more time to review skills taught to the mastery level.*
- *Expectations are very high, which is good. However, as teachers, we need to be able to get our students there. The District is highly focused on staying on pace with the curriculum and following it to the exact point. This doesn't allow teachers time to teach what is needed to get the students to meet the high expectations and really take ownership over the content within the curriculum.*
- *If teachers were permitted to make adjustments to the curriculum to fill gaps in the students' education, then it would make sense.*
- *Our curriculum in both math and ELA is riddled with mistakes that affect student growth.*
- *The lack of flexibility in expectations hinders the quality of work. Teachable moments are rich opportunities for learning. Being locked into a time schedule which is set in stone greatly and negatively affects student learning.*
- *For ELL students, it is clear that students are not always getting the material. When I was able to pull the kids into smaller groups and go deeper into the material it worked well, but there is no time to do that.*
- *In science classes, there are several students who are ELL. Those students need time to digest the material and vocabulary that is so specialized, but there is no time.*

CURRICULUM SUPERVISION

- *Teachers are extremely stressed out by the constant walkthroughs with negative feedback and observations that are extremely critical and make them feel terrible about themselves.*
- *The walk throughs are a challenge as well as not being able to have freedom to teach what my students need vs what the supervisors are telling me they need.*
- *The math supervisors expect all teachers to teach the same lesson the same exact way regardless of if some students have IEPs or are bilingual.*

- *There is mental anxiety of not being good enough in the eyes of the administration.*
- *Sometimes curriculum supervisors can have a lot of influence in our building. They keep jamming a lot in and teachers are not sure how they will finish everything.*
- *The curriculum supervisors are not connected to the classrooms.*
- *Curriculum supervisors have an important role in non-renewals. Teachers feel targeted based on their opinion of their use of scripts and pacing guides.*

Curriculum Findings

- ***Curriculum Development.*** Lakewood uses a significant amount of material that is developed internally. The model used for curriculum development and adoption empowers a small group of staff the responsibility to make all the curriculum decisions without input from other stakeholders. In most Districts, there are 'multiple layers' of the development process where there is a high level of teacher involvement and a pilot of materials before anything is finalized and approved at the Board level.

- ***Curriculum Differentiation.*** The focus on pacing guides, instructional frameworks, and lesson scripts leaves little room for differentiation in the classrooms. Teachers reported that even if their students are struggling, they have to move on to keep up with the pacing guide. There is no time to pause to ensure mastery. Additionally, even though some scripts and instructional frameworks may have suggestions for differentiating for their ELL student, there is no time to incorporate those ideas as they have to rush through their lessons to ensure they are on track. In multiple classrooms, PCG observed teachers telling their students that they had to move along during their lessons.

- ***Scripts and Pacing Guides.*** The scripts and pacing guides are full of rich information, resources, and teacher materials to support lesson planning and instruction. There are a lot of details and are useful for teachers. However, the anxiety shared by school-based staff from all levels during focus groups was very real. Staff shared that they are fearful that they will be "caught" when someone shows up unannounced for a walkthrough and the teacher is using something different than the script, pacing guide, or unit planner assigned for that day. In one classroom observed by PCG, the teacher shared that the lesson was not designed by a curriculum supervisor, but her students needed a break from a scripted lesson which included "staring at their computers." During the observed lesson, the students were highly engaged, and the lesson was well designed and delivered.

- ***Walkthroughs and Observations.*** The number of required walkthroughs and observations being completed by curriculum supervisors, instructional coaches, school administrators and the Superintendent are excessive. If each administrative team conducts five walkthroughs per day, there would be 200-300 walkthroughs per month occurring within each school. This count does not include walkthroughs by curriculum supervisors. It also does not include the required formal observation process. The number of walkthroughs is likely disruptive to classroom instruction and has not resulted in increased student gains.

- ***Frequent Revision Process.*** Scripts, pacing guides, and unit planners are constantly being updated due to mistakes that teachers find and report. Some pacing guides are being developed during the school year due to the various changes needed.

- ***Change in Schedules.*** At the high school level, bell schedules have reportedly changed each year for the past several years, including most recently shortening the time allotted per period for most core classes. These changes directly impact the curriculum and pacing guides. This year the schedule is a traditional 40-minute class period for most classes. Teachers shared that they did not have enough time to teach their lessons compared with the AB block schedule that was at the high school during the 22-23 school year.

- ***Curriculum Budget.*** The curriculum budget is a large expenditure for the Lakewood School District, as it is for most Districts. However, with a curriculum that is mostly developed by the District, there are numerous added expenses such as new materials, professional development, curriculum writing staff costs, etc. that may not be found in other Districts.

Multi-Tiered System of Supports

New Jersey Framework

Under the Multi-Tiered System of Supports (MTSS) framework, core instruction is evidence-based, rigorous and of high quality. By utilizing a universal design for learning system, learning differences are considered proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented. Many states have established intervention systems that align to the core tenets of the MTSS process and branded them accordingly. In New Jersey, MTSS has been adopted as the New Jersey Tiered System of Support (NJTSS) as shown in **Figure 15**.

NJTSS is a framework of academic and behavioral supports and interventions to improve student achievement based on the core components of MTSS and the three-tier prevention logic of Response to Intervention (RtI). It builds upon the I&RS model and gives schools a structure to meet the academic, health, enrichment, and social emotional needs of all students. The tiered system involves the systematic development of nine essential components in schools for the effective implementation of the framework with fidelity and sustainability. Those components include:

- Effective District and school leadership;
- Family and community engagement;
- Positive school culture and climate;
- High-quality learning environments, curricula, and instructional practices;
- Universal screening;
- Data-based decision making;
- Collaborative problem-solving teams
- Progress monitoring; and
- Staff professional development.[53]

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[53] New Jersey Tiered System of Supports. (n.d.). https://www.state.nj.us/education/njtss/brief.pdf

FIGURE 15: NEW JERSEY TIERED SYSTEMS OF SUPPORT (NJTSS) PYRAMID, 2020-2021 SCHOOL YEAR
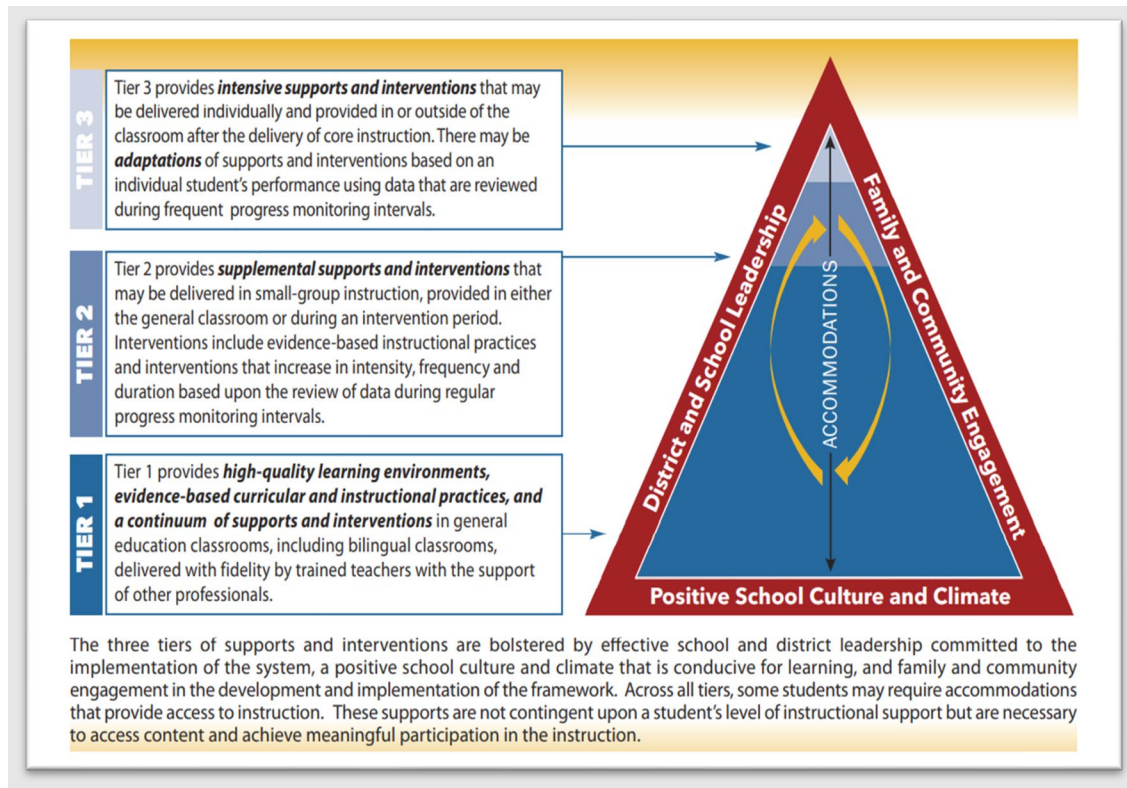
Note. Data retrieved from "New Jersey Tiered System of Supports", by New Jersey Tiered System of Support (https://www.state.nj.us/education/njtss/brief.pdf)

Intervention and Related Services (I&RS)

In New Jersey, when it is first identified that a child is struggling, Districts first engage the support of its Intervention and Referral Services (I&RS) team. I&RS regulations in New Jersey pre-date the national movement toward a Multi-Tiered System of Support (MTSS) framework.[54] However, the intent of the work is aligned: to provide a "coordinated, formal, and well-articulated system of supportive activities and services for staff who have identified student difficulties and those who will be involved in the amelioration of the identified educational concerns."[55] The requirements set forth in these regulations are intended to provide schools with direction in formulating coordinated services and team delivery systems to address the full range of student learning, behavior, and health problems in the general education program. I&RS is designed to be a student support service approach that helps school-based staff and parents address "early identification and intervention of problems at the elementary, middle and high school levels."[56] According to N.J.A.C 6A:16-8.1.,8.2, the goal of the committee is to see measurable student improvement in the identified targeted areas. Under these regulations, New Jersey schools have the flexibility to choose the

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[54] RTI is a systemic, multi-tier approach to help support students with learning and behavior needs and seeks to prevent academic failure through early identification, frequent progress monitoring, and increasingly intensive research-based instructional interventions for children who continue to struggle. The RTI method was developed as an alternative to the discrepancy-model, which requires children to exhibit a discrepancy between their ability (as measured by their IQ) and their demonstrated academic achievement (http://www.rtinetwork.org/).

[55] *Resource Manual for Intervention and Referral Services (I&RS)*. (n.d.). Official Site of the State of New Jersey. https://www.nj.gov/education/njtss/resources/irs/manual/

[56] Ibid. In February 2014, the New Jersey State Board of Education re-adopted *N.J.A.C.* 6A:16, with amendment to the regulations at *N.J.A.C.* 6A:16-8 that establish intervention and referral services (I&RS). The 2008 I&RS manual is being updated to reflect these changes and will be posted to the state's website upon completion.

most appropriate team configuration to perform I&RS services for their buildings. In addition, they have the flexibility to choose appropriate interventions.

District Practices

Lakewood Public School District adopted Policy 2417 – Student Intervention and Referral Services originally in 2013, followed by an edited version in 2022. This policy establishes the requirement that each school building operate an intervention and referral services team to assist students who are experiencing learning, behavior, or health difficulties and that the District utilize the appropriate multidisciplinary team approach, such as Multi-Tiered System of Supports, for planning and delivering intervention supports.

District Policy[57]
2417 - STUDENT INTERVENTION AND REFERRAL SERVICES (M)
Section: Program
Date Created: October 2013
Date Edited: May 2022

The Board of Education directs the establishment and implementation in each school building in which general education students are served, a coordinated system for planning and delivering intervention and referral services designed to assist students who are experiencing learning, behavior, or health difficulties, and to assist staff who have difficulties in addressing students' learning, behavior, or health needs in accordance with the requirements of N.J.A.C. 6A:16-8.1 and 6A:16-8.2. The Board of Education shall choose the appropriate multidisciplinary team approach, such as the Response to Intervention (RTI) or a Multi-Tiered System of Support (MTSS) model for planning and delivering the services required under N.J.A.C. 6A:16-8.

Students who are experiencing learning, behavior, or health difficulties shall be referred to the school's Intervention and Referral Services (I&RS) Team. The intervention and referral services shall be provided to support students in the general education program and may be provided for students who have been determined to need special education programs and services pursuant to N.J.A.C. 6A:16-8.1(a). The intervention and referral services provided for students who have been determined to need special education programs and services shall be coordinated with the student's Individualized Education Program Team, as appropriate. Child Study Team members and, to the extent appropriate, specialists in the area of disability may participate on intervention and referral services teams, pursuant to N.J.A.C. 6A:14-3.1(d)6.

The functions of the system of intervention and referral services in each school building which general education students are served shall be pursuant to N.J.A.C. 6A:16-8.2(a) and as outlined in Regulation 2417.

Records of all requests for assistance, all intervention and referral services action plans, and all related student information shall be maintained in accordance with Federal and State laws and regulations and New Jersey administrative code pursuant to N.J.A.C. 6A:16-8.2(a)9.

The I&RS Team in each school building shall review and assess the effectiveness of each intervention and referral services action plan in achieving the identified outcomes, and modify each action plan to achieve the outcomes, as appropriate.

At a minimum, the I&RS Team shall annually review the intervention and referral services action plans and the actions taken as a result of the building's system of intervention and referral services, and make recommendations to the Principal for improving school programs and services, as appropriate.

At the end of the school year, the Principal shall, in consultation with the I&RS Team, develop a report on the concerns and issues identified by the I&RS Team and the effectiveness of the services provided in achieving the outcomes identified in the intervention and referral services action plans. This report shall be provided to the Superintendent of Schools.
N.J.A.C. 6A:14; 6A:16-8.1; 6A:16-8.2

Adopted: 17 October 2013
Revised: 10 December 2014
Revised: 27 May 2022

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[57] *Lakewood Public School District Adopted Policy 2417*. (n.d.). Lakewood Public School District

Despite the reference to employing an MTSS framework in this policy and other supporting documents, focus group participants generally either did not know what MTSS was or said that their school does not use it. It was reported by multiple focus group participants that there was recent professional development for tiered level of instruction, but also that "*our curriculum is not set up to allow teachers to implement*" this model.

School-based staff did, however, describe what interventions occur at Tiers 2 and 3. There were a wide variety of descriptions regarding how interventions are used to support students, what staff believe to be available, and how I&RS intersects, specifically, staff report that:

- Teachers struggle to meet the needs of students, when often almost the entire classroom requires Tier 2 intervention.
- Younger students are not cognitively ready to learn what they are being taught. Tier 2 in 2nd grade is spent on students learning first grade skills, so the gap continues to widen. Many students who are assigned Tier 2 interventions on iReady are unable to sit and work independently on it.
- Tier 3 stops at grade 3, with no Tier 3 reading intervention in grades 3-5.
- Some teachers are reportedly unaware of what Tier 3 means and do not know about I&RS.
- School-staff can recommend students for I&RS but in the past few years this has not been brought up at their schools.
- At the high school level, students are more frequently referred for I&RS for absences and behaviors, not for suspected disability.

There were also expressed concerns that students in middle school are far behind in reading, functioning at the 3rd or 4th grade reading level. They may be able to read words, but their comprehension is lacking.

The 2023-24 Lakewood Public School District goals noted a focus on improving student achievement through improving Tier 1 universal instruction through "giving teachers the resources and supports needed to teach more efficiently and effectively," and improving Tier 2 small group through "intensive, purposeful instruction based on the individual needs of students (data driven)."[58] The power point includes the graphic shown here, as a means to explain the tiers of intervention.
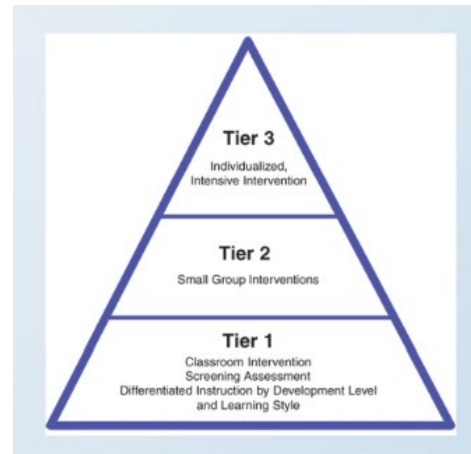
FIGURE 16: MTSS FRAMEWORK

For the 2023-24 school year, the K-1 Math Intervention Program is in its second year of implementation. Two Math Interventionists have been assigned to Piner Elementary School and Spruce Street School. Eligible students will receive individualized, intensive math instruction in order to close gaps before they widen.

The K-2 Reading Intervention Program will continue to provide individualized, intensive reading instruction to students in grades K-2 at Piner, Spruce, Oak and Clifton Avenue Elementary Schools. Maintaining student data is required in order to measure/monitor progress.

While Lakewood appears to have an intentional framework and intervention resources to support students with their academic and behavioral needs, there seem to be gaps in school-based staff's understanding of them, a consistent application of them across schools and classrooms, and clear documentation about expectations.

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[58] *Lakewood School District's Goals for the 2023-24 School Year*. (n.d.). Lakewood Public School District.

Multilingual Learners

The Lakewood Public Schools Multilingual Learners (ML) program services approximately 1,735 students from kindergarten through grade 12. The majority are Spanish speaking. The second highest population is Ukrainian, with approximately 20 students. The District also services students from a variety of other language backgrounds, including Mandarin, Gujarati, Georgian, Lithuanian, Russian, and Polish. It was reported that roughly 95% of students need a language placement test when they register for schools.

There are 36 English as a Second Language-certified (ESL) staff across the District, according to District-provided data.

The District's ML program is primarily a combination of Bilingual classes taught in the student's native language and Sheltered English Instruction classes. In addition, the District has established a Newcomer Program at all levels (elementary, middle school and high school) for newly arrived ML students who have significant gaps in their formal education and/or are a minimum of two grade levels behind. The Newcomer Program is designed to meet the academic and linguistic needs of these students in an accelerated and individualized instructional setting.[59] Bilingual and Newcomer instruction is offered in Spanish. **Table 15** lists the types of programs and ESL support services within the District.

TABLE 15: LAKEWOOD PUBLIC SCHOOL DISTRICT PROGRAM TYPES AND SERVICES FOR MLs

Program Type	Description	ESL Support
Bilingual Tier 1-2 Classes	For students at ELP levels 1 and 2. Bilingual certified teacher. Spanish instruction while acquiring BICS in English	**Two period minimum of ESL**
Bilingual Tier 3 Classes	For students at high ELP level 2 or low 3s. Bilingual certified teacher. Dual language instruction.	**Two period minimum of ESL**
SEI (Sheltered English Instruction) Classes	For students at ELP level high 3s to 4.4. Classroom teacher who has received a minimum of 15 hours SEI training. Instruction in English	**A minimum of one period of ESL**
3 Newcomer Classes	Bilingual certified teacher. Instruction in Spanish. Small class sizes. For newcomer students who have significant gaps in their education	**Two periods of ESL** **An additional period of Rosetta Stone at the High School**

Table 16 displays the programs for multilingual learners in each building and their enrollment by grade. The bilingual program at Ella G. Clarke is only currently available in Grade 4 and has an enrollment of only 16 students. The bilingual program at Oak Street is only currently available in Grade 2 and Grade 3. The only elementary Newcomer is at Oak Street in Grade 2. There is a gap in newcomer program availability in grades 3 through 6. There are no newcomer programs before 2nd grade or after 10th grade.

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[59] *Bilingual ESL Manual.* (n.d.). Lakewood Public Schools

TABLE 16: LAKEWOOD MULTILINGUAL LEARNER TOTALS BY SCHOOL AND GRADE LEVEL (2023-2024)

School	Program	Grade	Number of Students	Total
LECC	Sheltered English	PreK (3)	28	128
		PreK (4)	84	
		Kindergarten	16	
Piner Elementary School	Sheltered English	PreK (3)	15	231
		PreK (4)	59	
		Kindergarten	76	
	Bilingual	Kindergarten	81	
Spruce Street School	Sheltered English	Grade 1	100	163
	Bilingual	Grade 1	63	
Ella G Clarke School	Sheltered English	Grade 3	28	139
		Grade 4	31	
		Grade 5	37	
		Grade 6	27	
	Bilingual	Grade 4	16	
Clifton Avenue Grade School	Sheltered English	Grade 2	64	307
		Grade 3	50	
		Grade 4	35	
		Grade 5	19	
		Grade 6	14	
	Bilingual	Grade 2	24	
		Grade 3	29	
		Grade 4	16	
		Grade 5	25	
		Grade 6	31	
Oak Street School	Sheltered English	Grade 2	71	313
		Grade 3	62	
		Grade 4	64	
		Grade 5	29	
		Grade 6	22	
	Bilingual	Grade 2	21	
		Grade 3	26	
	Newcomer	Grade 2	18	
Lakewood Middle School	Sheltered English	Grade 7	46	145
		Grade 8	30	
	Bilingual	Grade 7	28	
		Grade 8	26	
	Newcomer	Grade 7	10	
		Grade 8	5	
Lakewood High School	Sheltered English	Grade 9	31	266
		Grade 10	28	
		Grade 11	30	
		Grade 12	42	
	Bilingual	Grade 9	39	
		Grade 10	44	
		Grade 11	32	

Ra218

		Grade 12	8	
	Newcomer	Grade 9	9	
		Grade 10	3	
Adult High School	Sheltered English	N/A	10	10

Highlighted cells indicate programs that do not exist across all grade levels in the given school
Note. Data are from " Lakewood ML Totals by School and Grade Level 2023-2024" provided by Lakewood Public School District

Table 17 shows the percentage of students attending each school who are multilingual learners. In some schools, over half of the students require multilingual services.

TABLE 17: MULTILINGUAL STUDENTS BY SCHOOL

School/Location	Number of ML Students	Student Enrollment	Total Percentage of the School Population
LECC	**125**	**268**	46%
Spruce Street School	**159**	**258**	62%
Piner Elementary School	**222**	**391**	57%
Oak Street School	**314**	**652**	48%
Clifton Avenue Grade School	**288**	**492**	59%
Ella G Clarke School	**149**	**347**	43%
Lakewood Middle School	**182**	**586**	31%
Lakewood High School	**296**	**1,335**	22%
Total	1,735	4,329	**40%**

Note. Data are from " Lakewood ML Totals by School and Grade Level 2023-2024" provided by Lakewood Public School District

Table 18 outlines the bilingual and ESL textbooks and resources used in the District K-12. Some of the resources are used in the general education classrooms, while others are focused on specialized instruction for Multilingual Learners.

TABLE 18: BILINGUAL AND ESL DEPARTMENTAL TEXTBOOKS AND RESOURCES

Course/Grade	Textbook and Resource Titles
Bilingual K-6	Amplify mClass Lectura Estrellita, Lunita, Fugaces Decodable Readers: La Familia Alegria, iHola! Decodable Readers: Just Right Reader Palabras a su Paso Heggerty iStation and iReady en Espanol Core Knowledge

	CKLA CommonLit
ESL K-6	Spotlight on English Lexia English National Geographic Cengage: Exploring Science Social Studies: myWorld Interactive Scholastic: Let's Find Out CommonLit
ESL Grades 7-8	Inside Level A Inside Level B Inside the USA
ESL Grades 9-12	Side by Side (Newcomer) Q-Skills for Success Achieve 3000
English for ELLs	Inside the USA (Newcomer) Edge
7th Grade	Math: Built to the Common Core-Course 2 ALEXS Online Program
8th Grade	Math: Built to the Common Core-Course 3 ALEXS Online Program
High School Newcomer Program	Rosetta Stone
High School Content Area Textbooks in Spanish for Bilingual Classes	
Algebra	Revela el Algebra ALEKS online program
World History	Historia del Mundo Newsela
US History/	Historia de Estados Unidos Newsela

Note: Data are from "2023-2024 Bilingual Textbook Inventory, Kindergarten - Grade 12" provided by Lakewood Public School District

College and Career Course Offerings

Dual Enrollment
Lakewood High School offers access to 18 dual enrollment courses through a partnership with Ocean County College. Approximately 125 students participated in the Dual Enrollment program during the 2023-2024 School Year per District data. This program is offered free of charge to students and allows students to graduate with an Associate's degree in their respective field of study.

Vocational Education
There are a number of career-focused options for students offered at Lakewood High School, such as Army Junior ROTC, Perkins Pathways coursework and other career-focused course offerings. Students can also enroll in a large number of vocational courses through the Ocean County Vocational Technical High School.

139 high school students participated in vocational courses during the 2022-2023 school year according to District provided data.

TABLE 19: LAKEWOOD PUBLIC SCHOOL DISTRICT VOCATIONAL COURSE ENROLLMENT

Year	Total VOC Students	Applied Arts	Engineering Computers & Design	Construction Trades	Health Technologies	Service Occupations	Transportation Technologies
2017-2018	97	6	3	7	34	31	16
2018-2019	91	13	1	9	26	30	12
2019-2020	112	16	5	15	30	34	12
2020-2021	131	17	12	16	36	25	25
2021-2022	152	21	9	15	40	38	29

| 2022-2023 | 139 | 20 | 4 | 10 | 43 | 46 | 16 |

Note: Data retrieved from Lakewood Public School District file, "2017-2023 Alcantara Data March 25, 2023"

FIGURE 17: 2023-2024 CTE PROGRAMS OFFERED AT LAKEWOOD HIGH SCHOOL

JROTC- 280301
1. Leadership Education Training 1
2. Leadership Education Training 2
3. Leadership Education Training 3
4. Leadership Education Training 4

Culinary- 120500
1. Hospitality & Culinary 1: Food & Beverage Commercial Foods
2. Hospitality & Culinary 2: Culinary Arts
3. Hospitality & Culinary 3: Catering and Restaurant Service

Fashion- 500407
1. Fashion & Design 1
2. Fashion & Design 2
3. Fashion & Design 3

TV & Production- 100201
1. Television Production 1
2. Television Broadcast Journalism 2
3. Advanced Television Broadcast Journalism 3

Recording Arts- 100203
1. Recording Arts 1
2. Recording Arts 2
3. Recording Arts 3
4. Recording Arts 4

Business- 520201
1. Level 1 (2.5 credits)
   a. Communications for Business Administration
   b. Entrepreneurship
   c. (will be changing the level 1 class to Marketing in future application)
2. Accounting
3. Business Management

Biomedical Science- 510000
1. Principles of Biomedical Science
2. Human Body Systems
3. Medical Interventions

Engineering- 140101
1. Intro to Engineering Design
2. Principles of Engineering
3. Engineering Design & Development

Visual Arts- 500409 at
1. Foundations of Art
2. Visual Media (Photography)
3. Commercial Art & Design

Note: Data retrieved from Lakewood Public School District file "2023-2024 CTE Programs at Lakewood High School", Dec 2023

The high school offers ten Career Academy Pathways according to the LHS 2023-2024 Program of Studies Handbook. Five students participated in a full-time Career Academy Pathway in the 2022-2023 school year across three Pathway programs based on District provided data. Full-time Pathway program participation has ranged between three to six students each year since the 2017-2018 school year.

TABLE 20: CAREER ACADEMY PATHWAYS

Year	Total VOC Students Career Academies *Full-time*	MATES Marine Academy of Technology & Environmental Science	GPAA Grunin Performing Arts Academy	ALPS Academy of Law & Public Safety
2017-2018	6	1	3	2
2018-2019	5	2	1	2
2019-2020	5	2	1	2
2020-2021	3	1	1	1
2021-2022	4	2	1	1
2022-2023	5	2	1	2

Note: Data retrieved from Lakewood Public School District file, "2017-2023 Alcantara Data March 25, 2023"

World Languages

Lakewood High School offers Spanish as a world language, including Spanish as a Native/Heritage language. Students can also take up to two years of American Sign Language. For students wishing to take an alternative world language, it may be taken as an independent study through an online learning platform Edmentum (German, French, Latin). Students who proficiently speak a language other than English may

also receive world language credits through the STAMP assessment. Students are required to take at least two years of world languages. These requirements meet the New Jersey Student Learning Standards for World Languages.

Advanced Placement and International Baccalaureate

Advancement Placement (AP) classes are offered at Lakewood High School to students in their junior or senior year. Many AP courses are listed as dual enrollment through Ocean County College in the LHS 2023-2024 Program of Studies Handbook. Nine AP courses were offered in the 2023-2024 school year per the Program of Studies Handbook. Students were enrolled in six of these courses during the 2022-2023 school year. AP enrollment and exam data are represented in the charts below.

TABLE 21: ADVANCED PLACEMENT (AP) STUDENT ENROLLMENT DATA (2023)

Class	Total	White	Black	Hispanic	Asian	White	Black	Hispanic	Asian
AP English III	12	1		11		8.3%	0.0%	91.7%	0.0%
English IV AP	14	1		13		7.1%	0.0%	92.9%	0.0%
AP US History	6	1		5		16.7%	0.0%	83.3%	0.0%
AP Calc AB	11	1	1	8	1	9.1%	9.1%	72.7%	9.1%
Biology AP Lab	23			21	2	0.0%	0.0%	91.3%	8.7%
AP Spanish	14			14		0.0%	0.0%	100%	0.0%

Note: Data retrieved from Lakewood Public School District file "#57 AP Student Demographics", Dec 2023

Each AP course offered at Lakewood High School enrolls majority Hispanic students, with the percentage ranging from 72.7% in AP Calculus AB to 100% in AP Spanish (**Figure 18).**

FIGURE 18: LAKEWOOD PUBLIC SCHOOL DISTRICT AP ENROLLMENT BY SUBGROUP (2022-2023)
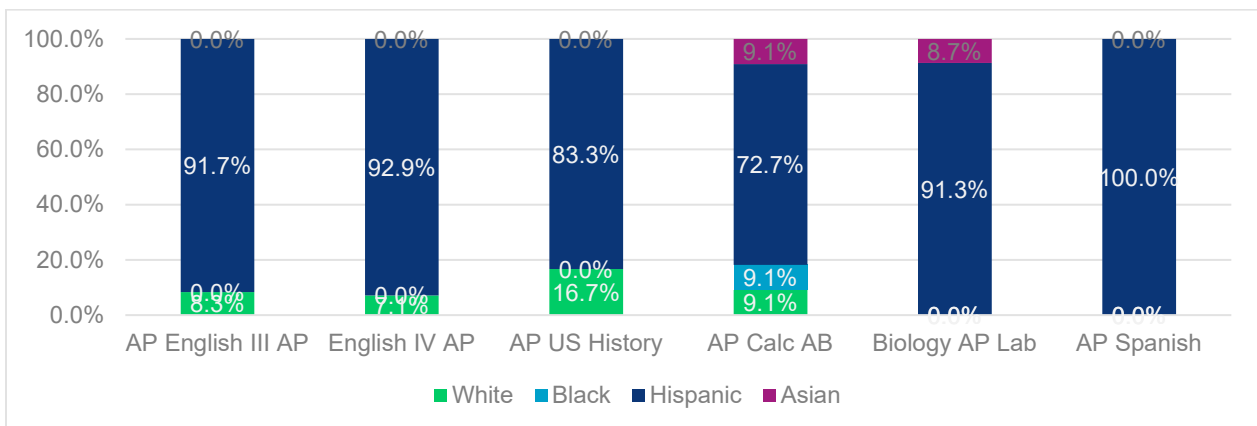
Note: Data retrieved from Lakewood Public School District file "#57 AP Student Demographics", Dec 2023

TABLE 22: ADVANCED PLACEMENT (AP) STUDENT ASSESSMENT DATA (2023)

Exam	Attempted	#Did Not Pass	#Pass	Did Not Pass	Pass
English Literature	3	2	1	66.7%	33.3%
Spanish Language and Culture	15	2	13	13.3%	86.7%
US History	5	5	0	100.0%	0.0%
Biology	9	8	1	88.9%	11.1%
Calculus AB	9	6	3	66.7%	33.3%
English Language	6	4	2	66.7%	33.3%
All Exams	47	27	20	57.4%	42.6%

Passing score is a 3 and above.
Note: Data retrieved from Lakewood Public School District file "#58 - AP Scores 2023", Dec 2023.

As shown in **Figure 19,** of the students taking AP exams for courses offered at Lakewood High School, more than half of the students did not pass in all courses except for Spanish Language and Culture. In 2022-2023, no students who took the AP US History course passed and only 11.1% of students taking Biology passed.

FIGURE 19: AP EXAM OUTCOMES FOR LAKEWOOD PUBLIC SCHOOL DISTRICT (2022-2023)
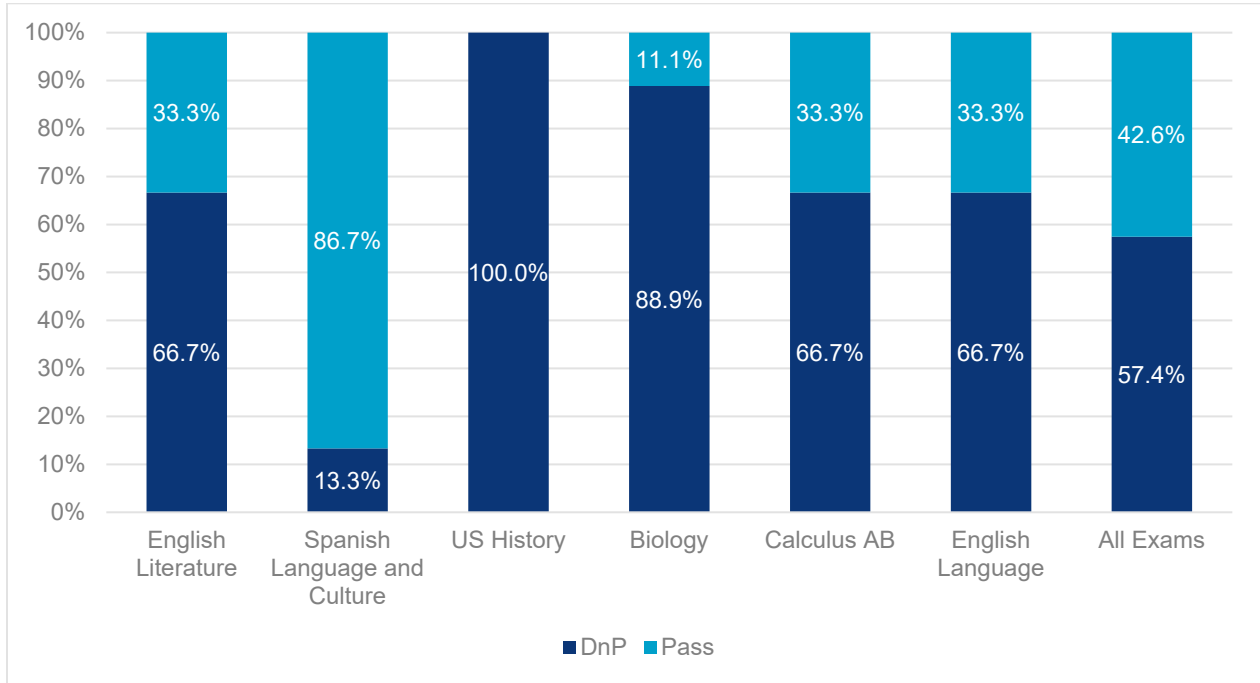
Note: Data retrieved from Lakewood Public School District file "#58 - AP Scores 2023", Dec 2023.

TABLE 23: ADVANCED PLACEMENT CLASS ENROLLMENT VS. EXAM COMPLETION (2023)

Class	Total # Student Enrollment	Total # Students Taking AP Exam	% Difference
AP English III	12	8	40%
English IV	14	9	44%
AP US History	6	5	18%
AP Calc AB	11	11	0%
Biology AP Lab	23	9	87.5%
AP Spanish	14	14	0%

Note: Data retrieved from Lakewood Public School District file "#57 AP Student Demographics", Dec 2023

- In 66% of AP classes, all students enrolled in the class did not take the AP exam.
- The largest differential of student enrollment and students taking the exam was in AP Biology Lab. While the class had 23 students enrolled the in class, the largest number of students in any AP class, only 9 students took the exam.
- The lowest performance results were in AP US History, which had the lowest enrollment of 5 students and 0% of students passing the exam.
- The highest percentage of students earning a passing score of 3+ was in AP Spanish. All students in the class were Hispanic and may have had previous Spanish language proficiency.

Figure 20 compares enrollment in AP/IB courses, completion of AP/IB exams, and average pass rates of AP/IB exams across comparison Districts and at the state level from 2020-2021 to 2022-2023. Lakewood's enrollment in AP/IB courses is below each of the comparable Districts and the state average. Lakewood's completion of AP/IB exams is lower than all Districts and the state average except for Brick Township. The NJ Performance Reports require 20 or more students to complete the AP exam for performance data to be reported. Therefore, there is no average pass rate provided for Lakewood across this timeframe.

FIGURE 20: AP PARTICIPATION AND OUTCOME ANALYSIS ACROSS DISTRICTS
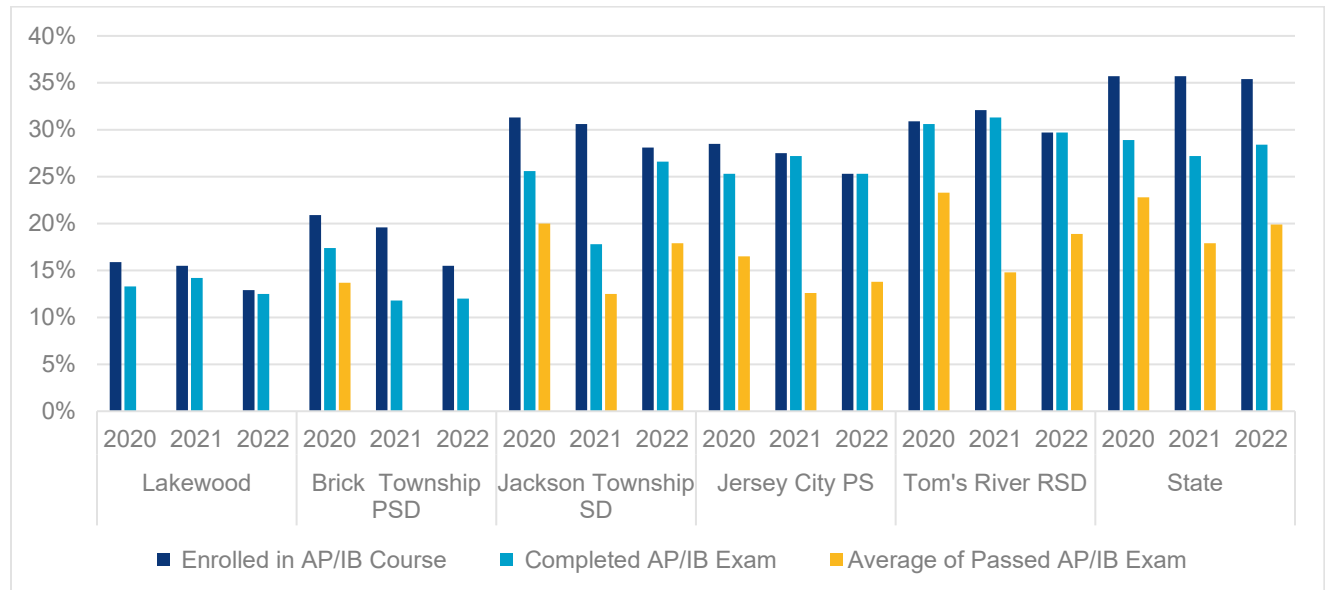
Note: AP/IB Data retrieved from New Jersey Department of Education "NJ Performance Reports 2021-2022", access Jan 2024, https://rc.doe.state.nj.us/.

The Lakewood Public School District does not offer an International Baccalaureate Program.

Professional Development

Professional development is a major component of the curriculum supervisor's role.

- Curriculum supervisors and the instructional coaches use data collected from classroom walkthroughs, coaching sessions, and student assessment data (both internal assessments as well as mandated state assessments) to determine what professional development will be offered each year.
- There are three professional development days before the start of school, but the District does not have early release days or many teacher workshop days to provide a time that teachers from the same grade levels or content areas can work together.
- There is a high use of Professional Learning Communities (PLCs) where training is planned on the units being taught or on questions that teachers have regarding instruction.
- The District also relies on instructional coaches, especially at the elementary level, to work with struggling teachers and model lessons for them to grow their expertise.
- Teachers have many opportunities to participate in professional development virtually, in the District, or through outside conferences and courses.

Survey data results in **Figure 21** shows that not all teachers value the professional development or the ability to meet the needs of their students.

- 56% of teachers agreed with the statement that the "professional development opportunities offered by Lakewood Public School District help me monitor student progress."

- 70% of teachers agreed with the statement that "I have the professional development I need to implement the NJLS effectively.

FIGURE 21: PROFESSIONAL DEVELOPMENT STAFF SURVEY RESPONSE
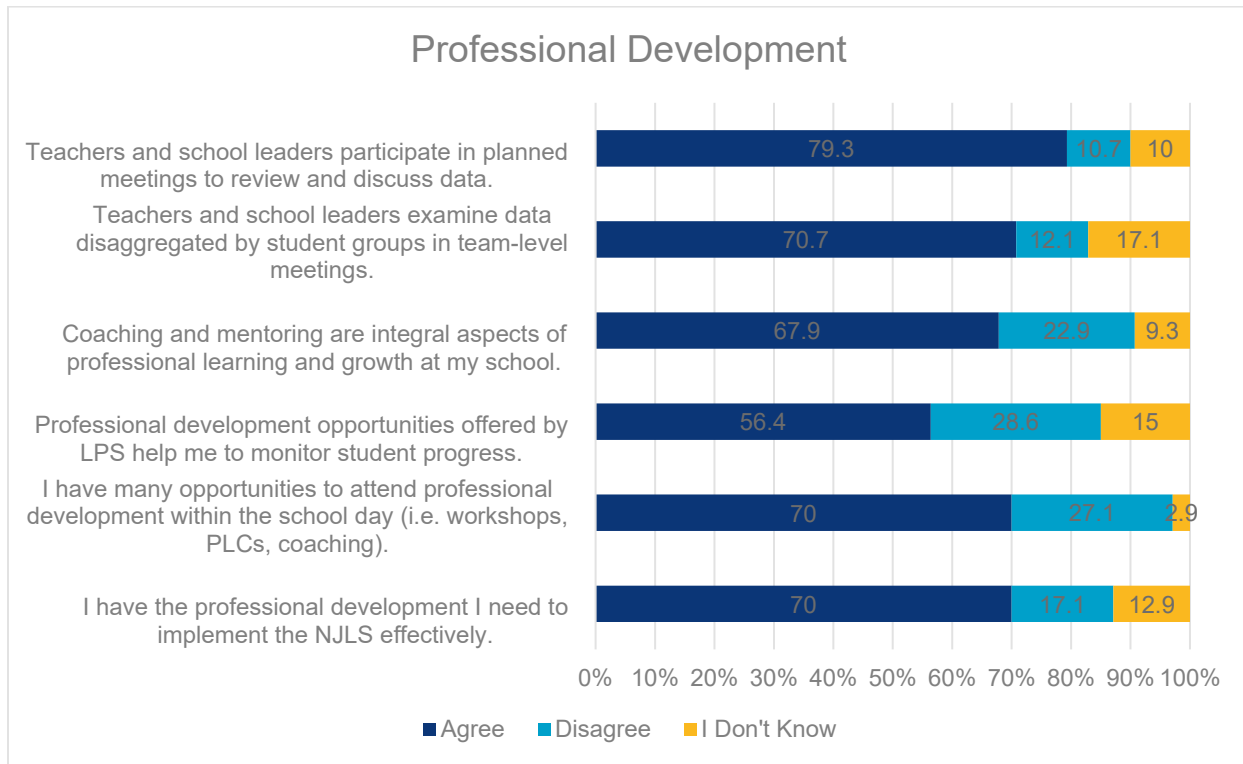
Table 24 provides a sample of a professional development calendar for September. There were similar calendars provided to PCG for every month including the summer. **Figure 22** shows a sample monthly PLC calendar. PLC calendars are created for each school's grade levels as well as District programs.

TABLE 24: SAMPLE SPECIAL EDUCATION PROFESSIONAL DEVELOPMENT CALENDAR FOR SEPTEMBER

September
• CEU PD Goal Book Training for all Teachers, Supporting all Students in the classroom - All Paraprofessionals by Kirby Jones Devorie- First 3 Days of School
• SE Expectations - Training for all SE Teachers - Lakewood Special Education 23 24
• 3-5 LLD Training ,ELA Modifications LLD 3-5 Math Modifications LLD 3-5 Training for Paras in the Autistic Classes, (Piner, Spruce, and Oak)   Paraprofessional training , Nurse Meeting
• -Meeting with Alicia.. - Meeting with Julian O'Neil , visit to all the Classes
• CST Training with Chrisite CST Training PowerPoint
• Clarke Team Teaching Training In Class Resource PowerPoint, Sign in Sheet for Clarke 9/11 and LHS PLC All Day. 9/11/ 23
• Sonday PD for Teachers that have not been trained, Visit to spruce SE Classes, Follow up with K. Elias and R. Erreich

• SE Meeting , Meeting with Oak MD, Meeting with Gina, Visit to LMS LLD classes, Linda S. Tara C and Syvia F.
• Clarke - SPED Coaching Sped and Clifton Team Teaching- CAGS ICR Training 9.14.23.pdf. Clifton Team Teaching
• Threat Assessment Team Mandatory Training
• Clarke - SPED Coaching, Oak After School Inclusion Training sign in sheet for after school PLC by D.S Sign in Sheet LMS Inclusion Training PLC   In Class Resource /LRE Special Education 23 24 Monday September 18th- MS PLC's
• Clifton - SPED Coaching
• Spruce - SPED Coaching Spruce Team Meeting Schedule
• Piner - SPED Coaching

Note. Adapted " Professional Development Training Calendar for Special Education " provided by Lakewood Public Schools.

FIGURE 22: SAMPLE PROGRAM PLC CALENDAR

Note: Retrieved from "PLC Calendars". Folder #14. Professional Development, Provided by Lakewood Public Schools.

There is the perception that more things are added each year and that more time is taken during the day because professional development is typically offered during prep time. Some teachers feel that they are frequently pulled away for Professional Development and departmental obligations, and they express a desire for more uninterrupted time for instruction. Examples of professional learning at individual schools include:

- Staff meetings are after school the first three Mondays of every month, sometimes these include professional development.
- Once a month there is a data mining PLC to help teachers understand how to use data and look at data to better instruction for their students.

- When a new curriculum is rolled out there is a 2-hour "unpacking" time block for teachers followed up by lesson demos.

CLASSROOM OBSERVATIONS

A PCG team conducted classroom observations from December 11 to December 14, 2023. The data provided in this chapter only includes the general education focused visits. The Special Education data and analysis is located in the Special Education chapter of this report.

TABLE 25: CLASSROOM VISIT DATA

Classrooms Visited		Elementary (K-6)	Secondary (7-12)	Total
General Education Classrooms Visits		11	15	26
Content Area Focus	**Elementary (K-6)**		**Secondary (7-12)**	**Total**
ELA Focus	6		6	12
Math Focus	4		5	9
Science Focus	0		4	4
Intervention	1		0	1

TABLE 26: CLASSROOM VISIT DATA RECORDING TOOL FOCUS AREAS

Area I: Focus on Learners	- Student Engagement - Student Activity - Whole Class - Small Groups or Paired - Individual
Area II: Focus on Instructional Practices	- Lesson Design - Checks for Learning/Understanding - Level(s) of Student Work - Instructional Materials
Area III: Focus on Classroom Environment	- Classroom Appearance - Classroom Management - Classroom Culture

Classroom Visits Data

The data outlined below are a summary of classroom visits based on the methodology previously described. The data provide a snapshot of instructional practices within the observed classrooms.

Focus on Learners

STUDENT ENGAGEMENT: ALL CLASSROOMS

The three areas under student engagement that the PCG team observed included whether students were **on-task, disengaged, and disruptive**. The following analysis and conclusions in this area included:

- **On-task**
  - Most students were on-task in both the elementary and secondary classrooms that PCG visited. There were very few students (less than 5%) who did not have their materials out, that included their laptops or packets, to complete the assignments.
  - In early grades, K-1, there was more student movement which made redirection necessary to ensure students were on-task. Nearly all students complied when reminded.

- o At the high school level, students sat at their desks quietly while the teacher used the PowerPoint to teach the lesson or showed problems on the board.

- **Disengagement**
  - o While students were on-task, it was difficult to determine the level of engagement versus compliance. This distinction was most difficult to discern when the whole class was using their computers at some point during 80% of the observed lessons. There were very few opportunities for students to work without their computers or engage with other students or in a classroom discussion.
  - o At the high school level, students stared at their computer screen while the teacher lectured or went through the slide deck of the PPT for the lesson.

- **Disruptive**
  - o Out of all the classrooms observed, the PCG team only viewed one incident of a disruptive student who required redirection. This student was in an early elementary classroom.
  - o When visiting both the middle school and high school, there were no disruptive or disrespectful students in the observed classrooms. PCG noted this absence as highly atypical.

STUDENT ACTIVITY
- **Whole Class**
  - o The majority of instruction was at the whole class level.
  - o Whole class instruction appeared as follows:
    - Teachers asked the entire group questions and students responded. Teachers typically called on students with their hand raised and did not often cold call or randomly select students.
    - At the high school, most students sat quietly and unresponsive when teachers asked questions.
    - In some classrooms, mainly at the elementary level, teachers used white boards (communicators) where students would write answers to questions or math problems and raise them up to show to the teacher their answers. In every observed classroom, there were students who did not show their white board, but the teachers did not address the student(s).
    - Whole class lesson design typically began with a short assignment posted on the PPT slide. Students worked independently before the lesson began.
    - Teachers used the gradual release of responsibility framework during instruction, including 'I do, We do, and You do.'
  - o During the general education/special education co-teaching or parallel teaching classroom visits, the following data were collected:[60]
    - In one instance, a general education teacher was alone in her room with students. There was not a special education teacher or paraprofessional present.
    - In one elementary classroom, there was a literacy block co-taught by two teachers, general education and special education. Both the general education teacher and the special education teacher were active in teaching the lesson. The students appeared comfortable with the routine.
    - In one of the secondary classes, there was a special education and general education teacher. The teachers' worked as a team to engage students and it was difficult to know which role the teachers' held. The teachers used technology but more as a support tool, but not as the only strategy to teach the concepts.

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[60] Additional data specific to classroom visits for special education are provided in the Special Education section of this report.

- **Small Groups or Paired**
    - There was one example observed by the PCG team of small groups or paired students.
    - There was one example observed of the "turn and talk" strategy used in an elementary classroom.
    - At the secondary level, there were some classes that were set up with tables rather than rows. These classes appeared to have an easier time working in pairs or small groups.
    - In some of the freshman classes, tight classrooms due to a large number of desks inhibited student collaboration.

- **Individual**
    - Individual work was the most common student activity observed.
    - Most classes were set up in rows made up of single desks or rows with desks pushed together to create horizontal rows. While Even when the classroom desk set up was conducive for students working together, teachers still required students to complete individual assignments.
    - At the high school level, there was a lot of individual work time at the end of the classes. That was particularly true for the smaller class sizes. In those classrooms, teachers finished their teaching early and students worked independently or talked quietly with another student.

Focus on Instructional Practices

LESSON DESIGN

- **Learning Objectives**
    - In most classrooms learning objectives were posted. At times, it was difficult to see how the lesson connected to the learning objective. Most teachers did not reference the learning objective during the lesson.
    - The PowerPoint deck included the learning goal. In some classes, the learning goal was in student friendly language.

- **Student Interaction**
    - Most instruction focused on the whole group. There was little interaction between students.
    - In the classrooms where there was not a computer assisted lesson (~27%), students engaged with the teacher in discussions or with their classmates.
    - Students interacted with each other in both English and Spanish. This was more frequently observed at the high school level.

- **Explicit Instruction**
    - Lakewood's Instructional Framework was evident in all classes.
    - Every classroom had a PowerPoint on the SMART board for the teachers to use to instruct the lesson.
    - In every math class PCG observed, all instruction was teacher-led. There was no student engagement during the explicit instruction part of the lesson.

- **Lesson Scripts and Pacing Guides**
    - The PCG team observed no teachers reading directly from scripts.
    - Teachers moved quickly through lessons to keep up with the timing of the lesson.
    - In three classrooms, teachers mentioned that they had to move on to complete their lesson during the designated class time even when students were not ready for the transition.
    - Time checks and timers were used in classes where students were doing independent work. Students were given a set amount of time to complete the assignment and most teachers were good at keeping to their time.

CHECK FOR UNDERSTANDING

- ***Strategies to Check Student Understanding***
  - o Teachers used verbal questioning to check for understanding. However, students were reluctant to respond and mostly sat quietly. This lack of participation was most prevalent at the high school level. It was unclear if this was due to lack of understanding, disengagement, or both.
  - o The most used strategy to check for understanding was the communicators (small white boards) at both the elementary and middle school level.
  - o PCG did not observe ML support services in any classroom.

LEVELS OF STUDENT WORK

- The levels of student work the PCG team observed included remembering, understanding, applying, analyzing, evaluating, and creating.
  - o In nearly all classrooms, there was a lot of teacher talk.
  - o Most classes focused on lower-level skills, such as remembering and understanding, through the use of worksheets or computer-based practice.
  - o In one classroom students applied their knowledge and one where they created original work in a team. Students were highly engaged.
  - o All opportunities to work at higher level were observed in science classrooms.
  - o ELA/literacy and math instruction was at the bottom of the skill level tiers. Students completed assignments/tasks on computers, with limited opportunity to move to a higher level. In one class, students watch movie clips in lieu of reading the assigned novel. While watching the clip, the teacher explained that what was happening in the movie was not in the novel. Students stared blankly at the screen.

INSTRUCTIONAL MATERIALS

- There was a lack of instructional materials used as part of the lesson, even though the classrooms had a variety of instructional materials around the room. Instructional materials used centered on computers, PowerPoint slides, worksheets/workbooks, and communicators (white boards) only.
- There was significant technology (laptop) use at the elementary, middle, and high school levels.
- There was a high level of similarity/predictability from class to class and between content.

Focus on Classroom Environment

CLASSROOM APPEARANCE

- Schools are clean and appear to be well maintained. There was a welcoming environment within the schools.
- Classrooms are filled with visuals to support students in their learning. As is typical, elementary schools have the most decorated and welcoming classrooms and at the high school level, classrooms do not have as much on the walls. It was holiday time so there were holiday displays at all levels.
- Anchor charts were present in all elementary classrooms. The anchor charts were used as part of the lesson's instruction in some observed lessons. It was noted that the charts were in English only. If a student was a native Spanish speaker, there were little written supports for them unless they were in an Multilingual classroom.
- Student work was more often seen in the hallways than in the classrooms.
- Most classrooms were orderly and safe. There were posters on the wall to show the "safe space" where students would congregate in case of an intruder.

CLASSROOM MANAGEMENT

- Observed classrooms were well managed, systems and routines were in place at both elementary and secondary levels.
- The PCG team did not observe disruptions in the classroom or in the hallways during transitions.

- All whole class management strategies observed were effective.
- PBIS was not apparent during class instruction time.
- Students were respectful to the adults and to their peers.
- At the high school level, it was observed that students did not know the names of other class members.
- Safety measures were observed in all schools.
- At elementary and middle schools, students entered the school by going through a metal detector, which was overseen by the safety staff stationed at the front entrance of all schools. In addition, all students carried a clear backpack.
- High schools used both metal detectors and a wand which they used on all students before entering the building. School safety staff patrolled the hallways and were stationed during class transitions. There were also cameras placed throughout the school.

CLASSROOM CULTURE

- Respectful relationships between students and staff were observed throughout the classroom observations. Teachers used respectful language when redirecting off-task students and the team did not observe classroom teachers raising their voices with students in their classroom.
- There was some display of enthusiasm and energy by staff, but there were many classes observed where teachers were low energy and did not show enthusiasm for the subject matter being taught. The only enthusiastic moments observed by both students and staff were in the classroom where the teacher did not follow the pacing guide to provide students with a lesson that allowed them to engage with each other.
- There was a noticeable lack of joy and student interest, especially in the upper elementary and secondary classrooms observed.
- The observed classrooms did not take time out to celebrate when students correctly answered questions or accurately solved a problem.

Classroom Observation Analysis

AREA I: FOCUS ON LEARNERS

- Students were not engaged in instruction as active learners.
- Students were very quiet. There was limited classroom discussion.
- At the upper elementary through high school levels, almost all observations were of students working independently on assignments.

AREA II: FOCUS ON INSTRUCTIONAL PRACTICES

- Most instruction was teacher-directed.
- Classroom lesson structure was predictable. As the team moved from class to class and school to school, similar lesson design and structure was observed.
- There were opportunities for student practice, but only independent practice. There was limited opportunity for any student collaboration or peer teaching.
- There were no ML support services in the general education classrooms observed.
- Lessons focused on lower part of Bloom's Taxonomy.[61] Students were typically asked to remember or understand the concepts that they were being taught, but not apply them in a new situation. Nor were they asked to analyze, evaluate or create.

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[61] Armstrong, P. (2010). *Bloom's Taxonomy*. Vanderbilt University Center for Teaching. https://cft.vanderbilt.edu/guides-sub-pages/blooms-taxonomy/

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FIGURE 23: BLOOM'S TAXONOMY
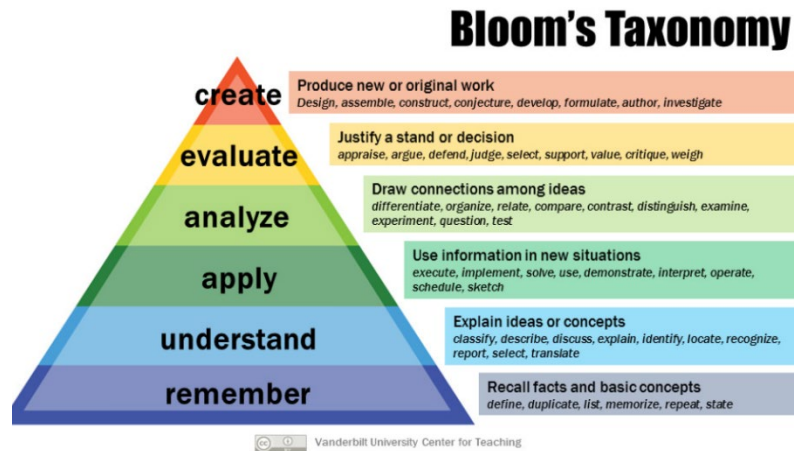
Note. Retrieved from "Bloom's Taxonomy" by Vanderbilt University's Center for Teaching, 2010, (https://cft.vanderbilt.edu/guides-sub-pages/blooms-taxonomy/.)

AREA III: FOCUS ON CLASSROOM ENVIRONMENT

- The classroom environment appeared safe and orderly. Students were compliant and behaved appropriately when asked by teachers, including during transitions.
- Teachers and students had respectful relationships in the classrooms that were observed, but not many classrooms had a feeling of warmth and connection. Classrooms felt business-like. This was more prevalent as the grade levels increased from elementary through secondary.

ASSESSMENT

Students are assessed often. When PCG observed classrooms ~30% of classes were either taking an assessment or prepping to take one the following day. Data are collected from the assessments and analyzed to make changes to the curriculum or pacing guide. Assessments used in the District for ELA/literacy include District-developed end of unit assessments, Dibels, iStation, mCLASS, and Foundational Skills Assessment (aligned with Letterland). Common Lit assessments are also used at the secondary level. **Figure 24** shows a sample assessment schedule for first grade literacy, which outlines the weekly foundational skills assessments.

FIGURE 24: FOUNDATIONAL SKILLS ASSESSMENT RESOURCES FIRST GRADE 2023-2024

Foundational Skills Assessment Resources First Grade 2023-2024

The following document outlines the Review Words, Unit Words, Diagnostic Words, and Sentences along with the points per Weekly Assessment for the Foundational Skills Block. These assessments will all be put into Linkit! under Foundational Skills (Letterland/ ReadBright). Please use this chart to ensure that the data entered is accurate and the same throughout the district. Please note that this is the plan that the K-2 ELA Department has laid out based on stakeholder feedback and it's mission to continuously grow our students.

Scoring: Set up a ratio to figure out what this score is out of 100. For example, if there were a total of 17 unit words (10 spelling pattern words + 4 review/challenge words + # of High Frequency Words) on the assessment and the student got 14/17 correct, divide 14 by 17 and the score is 82%.
- The letter sounds portion of the assessment does **NOT** count towards the total score but should be used for instructional purposes.
- The diagnostic words are **not** included in the percentage score. They are scored separately. There are four diagnostic words in each unit. Each word counts for one point so scores will range between 0-4.
- In order to achieve **mastery** in each unit, the students should score **at least 80%** on the unit words, review words, and High Frequency Words and **at least 3/4** on the **diagnostic words**.

	DATE	Skill (s) Covered	Letterland Unit	ReadBright Unit	Review Words/Challenge Words	Words	Diagnostic Words	Sentences	Points
	Sept. 7 -11	Review of Letterlanders	Unit A		Administer the Letter Sounds Assessment				
	Sept. 12-15 Short a	CVC Short a /ă/	Units 1 and 2	Unit 1	mat bat lap map	cat hat nap sat mad can am jam back sack	fan ham tack man	A tag is on a rag. The man ran.	18
	Sept. 18-20 Short i	CVC Short i /ĭ/	Unit 3	Unit 2	hat nap back sack	win big with fix pin thin six pick kick thick	mix fin lick it	I have a hat and a mitt. It is a can of jam.	18
	Sept. 21-26 Short o	CVC Short o /ŏ/	Unit 4	Unit 3	win six pick thick	top got hop lot mom not shop hot rock lock	mop dot sock ship	You can hop. The ship has a dock.	16
MP 1 Nov. 14th	Sept. 27-29 Short u	CVC Short u /ŭ/ Suffix s	Unit 6	Unit 4	top shop rock lock	fun but run cut sun shut bug hug rugs hugs	bun hut cups bugs	Do not run to the bus. His dad sat down.	18
	Oct. 2-4 Short e	CVC Short e /ĕ/	Unit 5	Unit 5	fun hug rugs hugs	wet yet then hen yes get tell well red jet	let pet net bed	I went to get a net. The pen was for you.	17

Note. Retrieved from "Math First Grade Assessments". Folder #39. K-2 Instructional Resources, Math. Lakewood Public Schools.

Math assessments are all District-developed. Since the K-8 math curriculum is developed in District, the assessments align to the units. At the elementary level, benchmark assessments include a beginning and end of year test in both English and Spanish. There are also District developed end of unit exams. Per sample pacing guides, students are given multiple quizzes and exams weekly or bi-weekly. At the secondary level, the District has developed unit 'mini tests', quizzes, and end of unit exams. There is also a frequent quiz and exam schedule for secondary students.

Student Outcomes

Graduation and Dropout Rates
Figure 25 and **Figure 26** display graduation rates and dropout rates compared across comparison districts and the state average. In 2022-2023, Lakewood Public School District had a graduation rate of 82.3%, 8.6% below NJ state average, and a dropout rate of 2.4%, which is double the state average.

FIGURE 25: GRADUATION RATES BY COMPARATIVE DISTRICT (2022)[62]
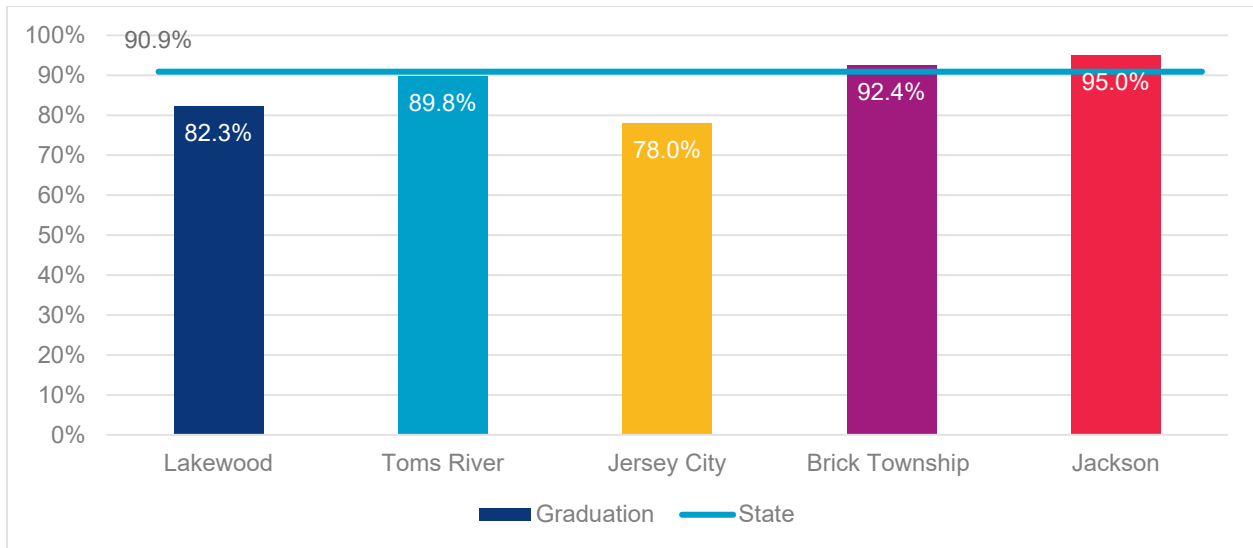
Note. Retrieved from "Fall Enrollment Reports" by New Jersey Department of Education, 2022, (https://rc.doe.state.nj.us/)

FIGURE 26: DROPOUT RATES BY COMPARATIVE DISTRICTS (2022)
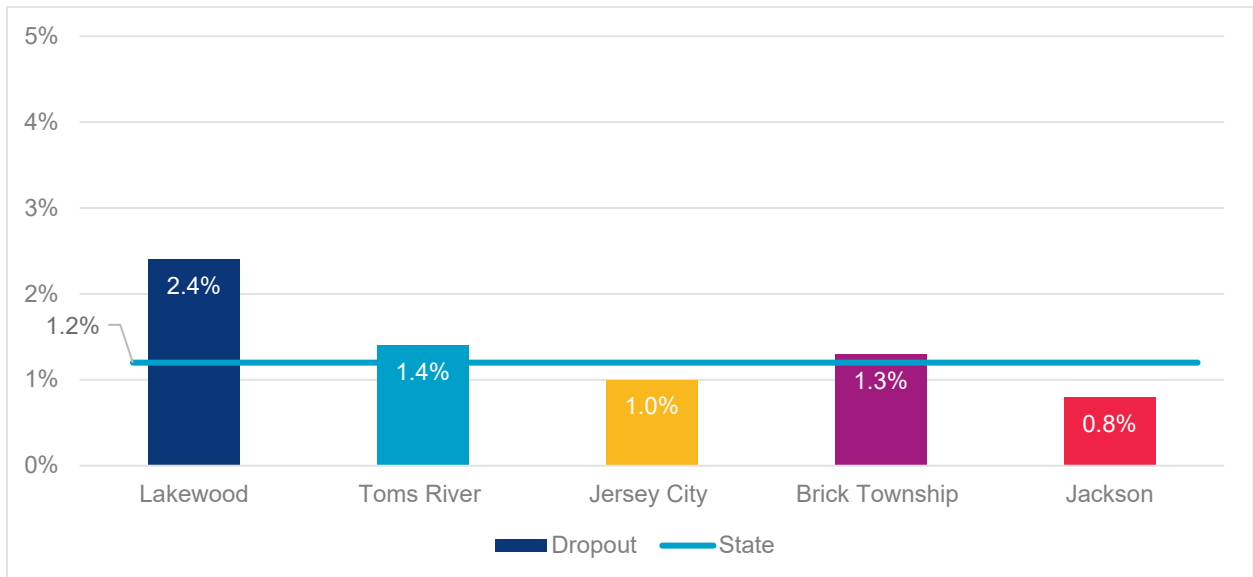
Note. Retrieved from "Fall Enrollment Reports" by New Jersey Department of Education, 2022, (https://rc.doe.state.nj.us/)

State Testing

The charts below display ELA and Math proficiency in state testing across Lakewood Public School District students in grades three, five, and eight from 2022 to 2023.[63] Note that subgroups without trend lines are due to lack of data for a given year.

From 2022 to 2023, ELA proficiency for all students, increased in grade five and grade eight (**Figure 27**). For third grade students, all proficiency levels remained the same from 2022 to 2023, with the exception of

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[62] *NJ School Performance Report.* (2023). Official Site of the State of New Jersey. https://rc.doe.state.nj.us/
[63] *Lakewood Township School District (29-2520) Performance Reports*. (2017). Official Site of the State of New Jersey. https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/

economically disadvantaged students, which dropped by one point. In 2023, English Language Learner, economically disadvantaged, and African American students in Lakewood performed above state proficiency levels. Students with disabilities, White students, and Hispanic students performed below state proficiency levels.

FIGURE 27: PROFICIENCY FOR GRADE 3 ELA
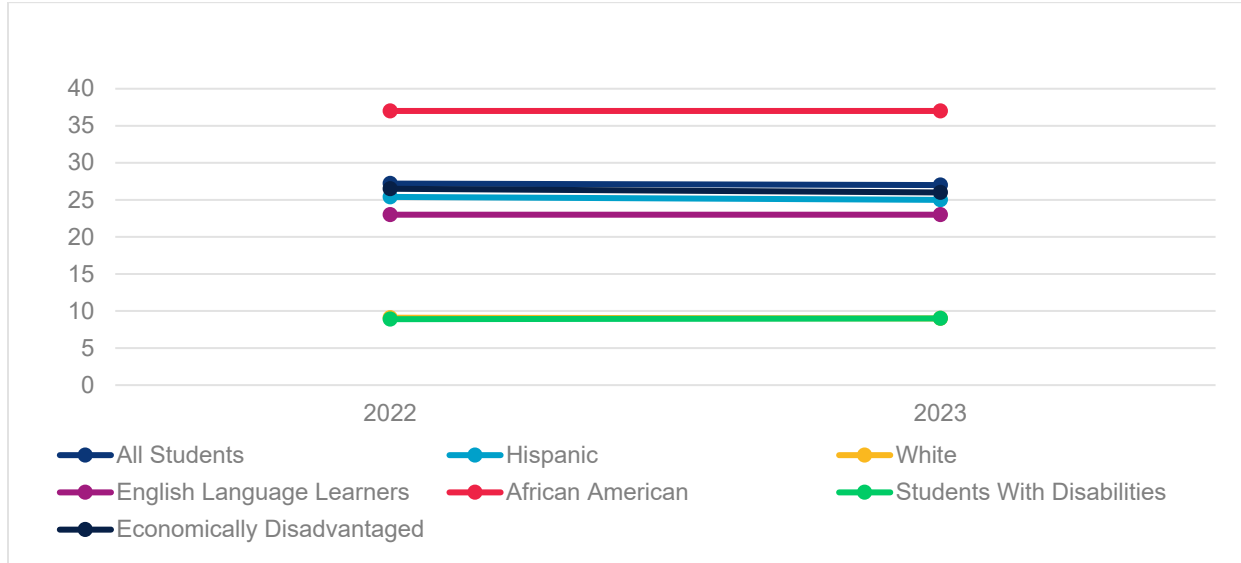
Note. Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey, (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

For fifth grade students, ELA proficiency increased across all subgroups (**Figure 28**). There are no data for white students' ELA proficiency in fifth grade for 2023. In 2023, all subgroups of students in Lakewood performed higher than the state proficiency level.

FIGURE 28: PROFICIENCY FOR GRADE 5 ELA
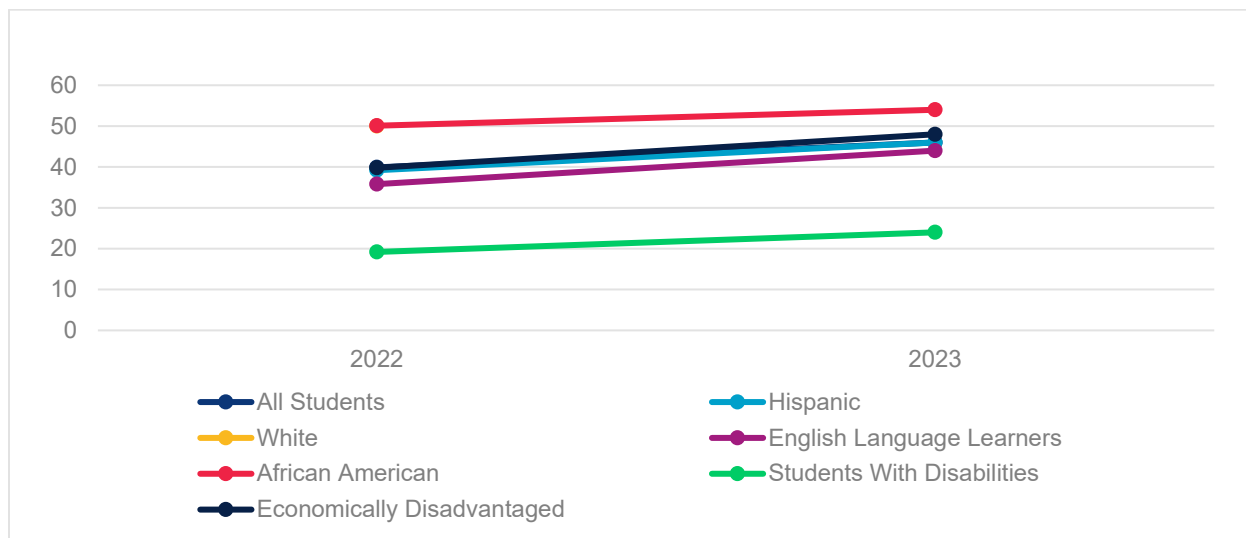
Note. Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey, (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

For eighth grade students, ELA proficiency increased across all subgroups except for students with disabilities, which decreased from 12% proficient in 2022 to 4% proficient in 2023 (**Figure 29**). There are no data for English Language Learner ELA proficiency in eighth grade for 2023. In 2023, Hispanic students in Lakewood were above state proficiency levels. All other student subgroups fell below state proficiency levels.

FIGURE 29: PROFICIENCY FOR GRADE 8 ELA
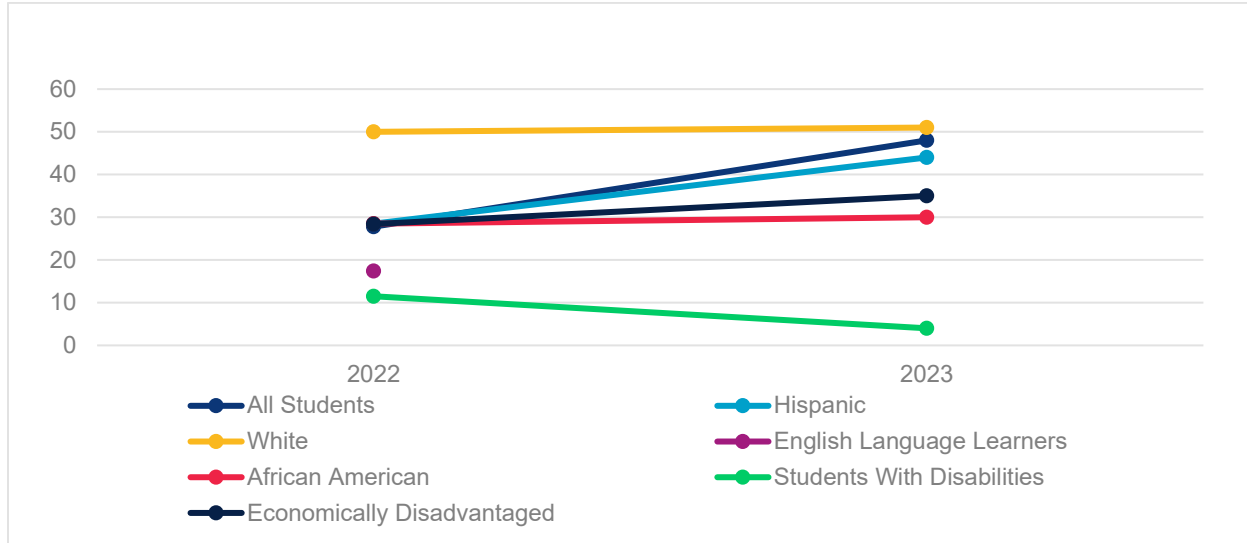
Note. Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey, (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

Across 2022 to 2023, math proficiency for all students decreased in grade three, increased in grade five, and increased in grade eight. For third grade students, math proficiency decreased for economically disadvantaged students, White students, and Hispanic students from 2022 to 2023 (**Figure 30**). Math proficiency increased for African American students, English Language Learners, and students with disabilities. In 2023, all subgroups except for African American students in Lakewood performed below state proficiency levels for third grade math.

FIGURE 30: PROFICIENCY FOR GRADE 3 MATH
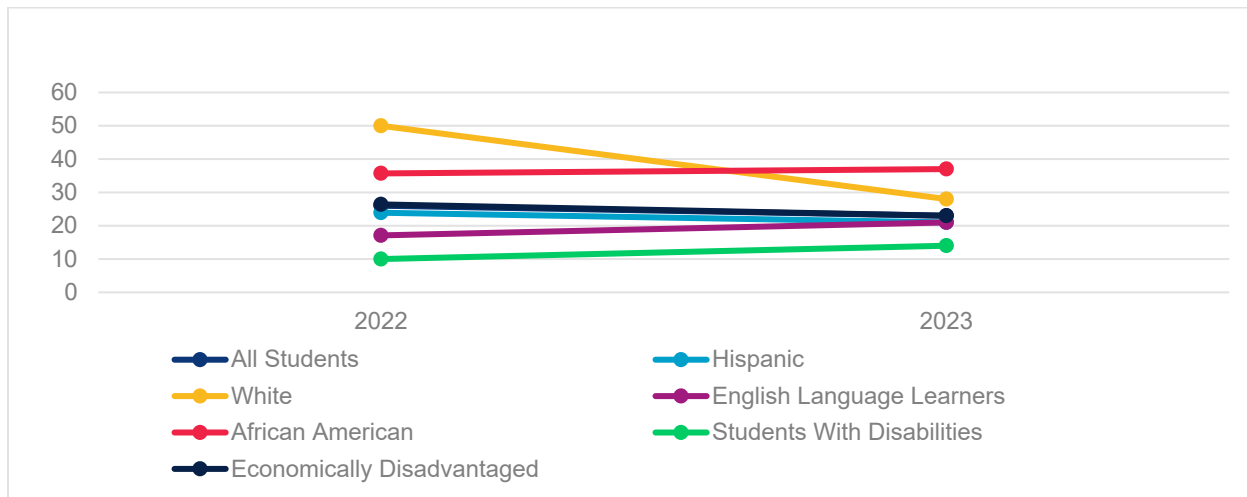
Note. Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

For fifth grade students, math proficiency increased across all subgroups (**Figure 31**). There are no data for White students' math proficiency in fifth grade for 2023. In 2023, all Lakewood student subgroups performed above state proficiency levels for grade five math except for students with disabilities.

FIGURE 31: PROFICIENCY FOR GRADE 5 MATH
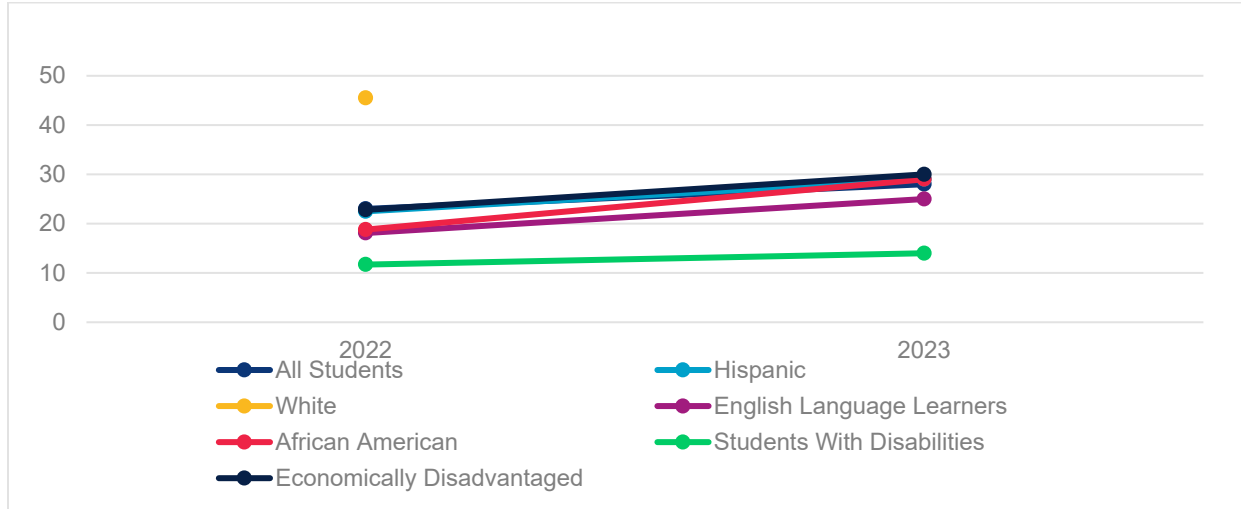
Note: Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey, (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

For eighth grade students, math proficiency decreased from 2022 to 2023 for African American students and remained the same or increased for all other subgroups (**Figure 32**). There are no data for White students' math proficiency in eighth grade for 2023. In 2023, all Lakewood student subgroups performed above state proficiency levels for eighth grade math except for White students.

FIGURE 32: PROFICIENCY FOR GRADE 8 MATH
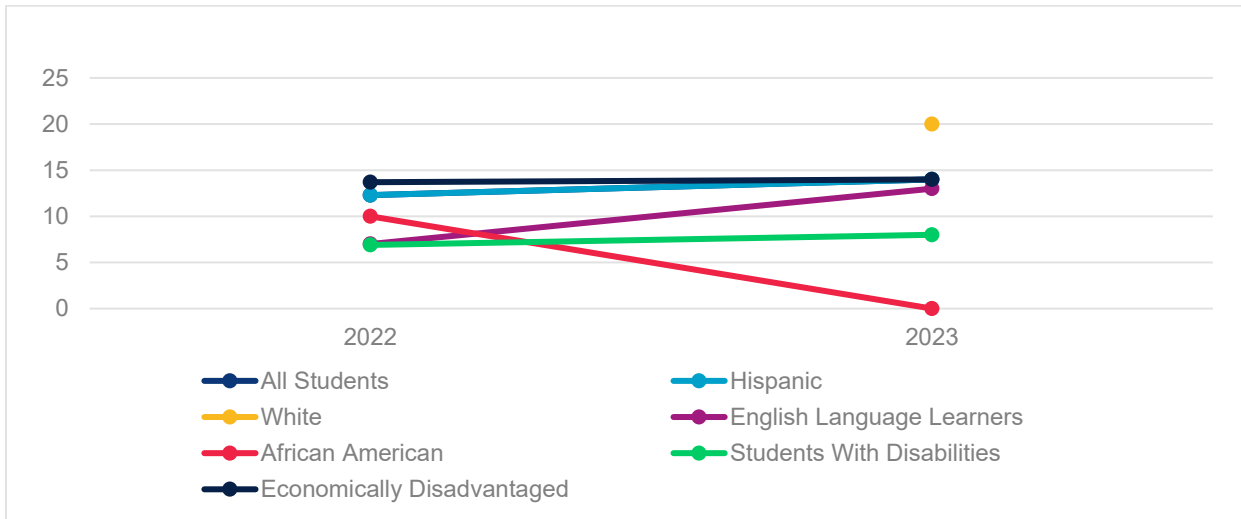
Note: Retrieved from "Lakewood Township School District (29-2520) Performance Reports" by Official Site of the State of New Jersey, (https://rc.doe.state.nj.us/prioryearreport/2016-2017/29/2520/)

SPECIAL EDUCATION

This chapter reviews the special education practices of the Lakewood Public School District and follows this organizational structure:

- Characteristics of students with disabilities in the District
- Teaching and Learning for Students with Disabilities
- Building Capacity and Materials
- Staffing, Leadership, and Collaboration
- Family Engagement, and
- Nonpublic Schools.

Throughout the chapter, PCG analyzes the approaches taken to teach and support students with disabilities, and their families, to understand how these practices may impact the overall efficacy of the District.

SUMMARY

- **State Performance Plan Indicators**. Of the indicators in which the District is not meeting targets, the most significant are Indicator 5, specifically including children with IEPs with typically developing peers 80% or more during the school day; Indicator 3B, specifically 4th grade ELA and math assessment; and Indicator 6, preschool children with disabilities in separate settings and the time spent during the day with typically developing peers.

- **Data Reporting**. There also appear to be significant data discrepancy and reporting issues for the SPP indicators and within categorizations of students by placement type.

- **Preschool Population**. Of the overall three-to-four-year old student population of students with disabilities, 79.8% were White and 15.7% were Hispanic. This demographic distribution is not representative of the District's overall population.

- **Incidence Rates.** Over the past three years, Lakewood's special education public school incidence rate is on average ten percentage points higher than the state's incidence rate.

- **Significant Disproportionality**. The District has consistently been found to be significantly disproportionate in several identification and placement categories and is required to set aside 15% of its IDEA federal grant dollars for Comprehensive Coordinated Early Intervening Services.

- **Limited Continuum Options**. The District has limited programming for Emotional Regulation Impairment, Visual Impairment, and Intellectual Disabilities in its schools.

- **Out of District Tuition Costs.** Lakewood's out of district tuition costs totaled $57.5M in 2021-2022 for 372 students, with comparable districts spending far less (from a low of $4.7M for 62.5 students in one district to a high of $20.5M for 129 students in another).

- **Access to the General Education Curriculum and Specially Designed Instruction (SDI).** There are several significant concerns regarding access to the general education curriculum and the overall implementation of SDI in Lakewood for students with disabilities, from the inability of teachers to modify curricular materials, to pacing concerns, to the implementation of parallel/co-teaching, to the fact that many IEPs reviewed do not align to grade level requirements.

- **Related Services Equipment**. The District has made substantial investments in state of the art related therapy equipment; yet, these resources appear to be underutilized given the District's population with significant disabilities is not educated within the public school buildings.

- **Families**. Lakewood has an active Special Education Parent Advisory Group (SEPAG), which meets monthly. Nearly three-quarters of parents surveyed were familiar with the SEPAG and the support it offers.

- **Nonpublic Schools.** The number of nonpublic students, ages 5-21, eligible to receive special education services increased by 1,606 students, from 8,171 in 2019-20 to 9,777 in 2021-22. This

growth represents a 20% increase in eligible students. These increases have required the District to set aside an increasing allocation under its IDEA federal grant. The management of child find, eligibility, and service determination and provision are managed by an outside provider.

CHARACTERISTICS OF STUDENTS WITH DISABILITIES

This section provides context for special education programming by reporting special education prevalence rates based on various subgroups of students, including analysis by disability type and race/ethnicity. Specifically, it addresses data pertaining to the overall percentage of students with IEPs based on total student enrollment and disability area, comparisons to other districts, and composition by race/ethnicity. This information provides an overall background for understanding the disparate characteristics of students who receive special education services. Data from the State Performance Plan (SPP) indicators are also presented to benchmark Lakewood against state targets in specific areas.

State Performance Plan/Annual Performance Report (SPP/APR) and Results Driven Accountability (RDA)

The United States Department of Education (ED), Office of Special Education Programs (OSEP) has established State Performance Plan and Annual Performance Report (SPP/APR) requirements that include 17 indicators. Based on requirements set by OSEP, each state is required to develop annual targets and monitor Local Education Agency (LEA) performance on each special education indicator. The state must report annually to the public on its overall performance and on the performance of each of its LEAs according to the targets in its SPP. Both states and LEAs receive one of the following "determinations" annually: 1) meets the requirements and purposes of the IDEA, 2) needs assistance in implementing the requirements of IDEA, 3) needs intervention in implementing the requirements of IDEA, 4) needs substantial intervention in implementing the requirements of the IDEA. Annual determinations dictate the amount of oversight or monitoring a state or LEA may receive the following year.[64]

FIGURE 33: IDEA PART B INDICATORS

- Indicator 1: Graduation Rate
- Indicator 2: Dropout Rate
- Indicator 3: Assessment (Participation and Performance)
- Indicator 4: Rates of Suspension
- Indicator 5: Least Restrictive Environment (LRE), Age 6-21
- Indicator 6: Preschool LRE, Age 3-5
- Indicator 7: Preschool Outcomes
- Indicator 8: Parent Involvement
- Indicators 9, 10: Disproportionate Representation Due to Inappropriate Identification
- Indicator 11: Timely Initial Evaluations
- Indicator 12: Early Childhood Transition
- Indicator 13: Secondary Transition
- Indicator 14: Post-School Outcomes
- Indicators 15, 16: Dispute Resolution
- Indicator 17: State Systemic Improvement Plan

Note. Retrieved from "IDEA Part B Indicators" by the US department of Education Results Driven Accountability website, (https://www2.ed.gov/about/offices/list/osers/osep/rda/index.html)

OSEP has been criticized in past years that the SPP indicators are heavily focused on compliance and have limited focus on results for students with disabilities. As a result, in 2013, the Department announced its intention to change this practice and to include test scores, graduation rates, and post-school outcomes as the basis of the new Results-Driven Accountability (RDA) structure. The intent of RDA is to strike a balance between the focus on improved results and functional outcomes for students with disabilities, while still adhering to the compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive the improved academic and functional achievement for students with IEPs. The SPP indicator data collected takes on additional importance now that OSEP has moved to the RDA framework, as there are points associated with both a "Part B Compliance Matrix" and a

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[64] RDA: Results Driven Accountability. (n.d.). U.S. Department of Education
https://www2.ed.gov/about/offices/list/osers/osep/rda/index.html

"Part B Results Driven Accountability Matrix." Taken together, these scores constitute an RDA Determination and conclude whether Districts and, ultimately states, meet IDEA requirements. The NJDOE monitors SPP/APR Indicators individually and through the QSAC process.

In the following sections, longitudinal SPP data are presented, alongside state targets, for select indicators. Additional data are presented in these three categories:

- State Performance Plan Indicators
- Special Education Demographics
- Educational Setting Data for Students with IEPs

State Performance Plan and Annual Performance Report Indicators

Over the past three most current years, with the 2021-22 school year being the most current, Lakewood Public School District has not met targets in the following indicators:

- Indicator 1: Graduation
- Indicator 2: Dropout
- Indicator 3: Participation in Statewide Assessment and Proficiency
- Indicator 5: School Age Least Restrictive Environment
- Indicator 6: Preschool Least Restrictive Environment
- Indicator 11: Timely Initial Evaluations
- Indicator 12: Early Childhood Transition

Of the indicators in which the District is not meeting targets, the most significant are Indicator 5, specifically including children with IEPs with typically developing peers 80% or more during the school day; Indicator 3B, specifically 4th grade ELA and math assessment; and Indicator 6, preschool children with disabilities in separate settings and the time spent during the day with typically developing peers. Referencing the exhibit below, which only includes indicators which Lakewood Public School District did not meet, further details the targets set by the state and the corresponding results achieved by the District in each indicator.

EXHIBIT X. STATE PERFORMANCE PLAN AND ANNUAL PERFORMANCE REPORT – INDICATOR TARGETS NOT MET BY LAKEWOOD PUBLIC SCHOOL DISTRICT[65]

Indicator	Years/Subject	State Target	District Result	Status
Indicator 1: Graduation	2021-22	91.6%	80.36%	Target not met
	2020-21	91.5%	88.89%	Baseline
	2019-20	81.5%	81.4%	Target not met
Indicator 2: Dropout	2021-22	-	-	Target not met
	2020-21	11.11%	8.3%	Baseline
	2019-20	-	-	NA – not listed
Indicator 3A: Participation In Statewide Assessments	2021-22 – High School ELA	95%	78.89%	Target not met
	2021-22 - High School Math	95%	88.76%	Target not met
	2020-21	-	-	NA
	2019-20	-	-	NA
Indicator 3B: Proficiency (NJSLA)	2021-22 – 4th Grade ELA	23.50%	18.2%	Target not met

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[65] Retrieved from: https://www.nj.gov/education/specialed/monitor/spp/.
*Not all indicators are measured by NJDOE each year. Some assessment not included due to the suspension of the New Jersey Student Learning Assessment during the pandemic emergency.
Legend: *Data are not displayed to support student privacy.

	2021-22 - 4th Grade Math	25%	12.79%	Target not met
	2021- 22 – 8th Grade ELA	20.5%	11.49%	Target not met
	2021-22 – 8th Grade Math	13.5%	*	Target not met
	2021-22 – High School ELA	17.5%	*	Target not met
	2021 – 22 High School Math	9.5%	*	Target not met
	2020-21	-	-	NA
	2019-20	-	-	NA
Indicator 5: School Age Least Restrictive Environment (LRE) – In General Education 80% or More of the School Day	2021-22	45%	5.5%	Target not met
	2020-21	45%	5.97%	Target not met
	2019-20	50%	6.2%	Target not met
Indicator 6: Preschool LRE	2021-22 – Regular Preschool	47%	42.6%	Target not met
	2021-22 – Separate Preschool	57.31%	38.75%	Target not met
	2020-21 – Regular Preschool	47%	19.93%	Target not met
	2020-21 – Separate Preschool	44.93%	38.75%	Target not met
	2019-20 – Regular Preschool	17.4	46.6%	Target not met
	2019-20 – Separate Preschool	50.7%	34%	Target not met
Indicator 11: Timely Initial Evaluations	2021-22	94.3%	100%	Target not met
	2020-21	95.81%	100%	Target not met
	2019-20	76.7%	100%	Target not met
Indicator 12: Early Childhood Transition	2021-22	100%	87.67%	Target not met
	2020-21	100%	86.32%	Target not met
	2019-20	100%	77.4%	Target not met

Note. Retrieved from "State Performance Plan Annual Performance Report" by Official Site of the State of New Jersey, (https://www.nj.gov/education/specialed/monitor/spp/)

Special Education Demographics

The data in the charts below reflect the statistics for public school students, ages 3-21, with Individualized Education Programs (IEPs).

Early Childhood Data
In 2022, 83.0% of students in early childhood had an identified disability.

FIGURE 34: PERCENTAGE OF STUDENTS WITH AND WITHOUT AN IDENTIFIED DISABILITY (AGES 3-4), 2022
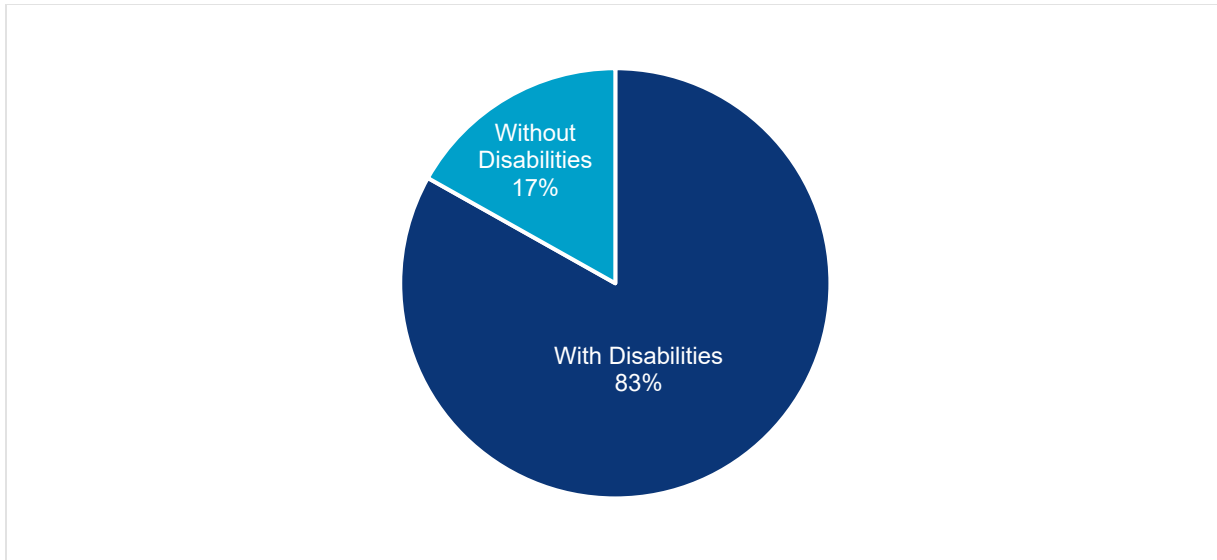
Note. Data are from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023" provided by Lakewood Public School District

Of the overall three-to-four-year old student population, 79.8% were White and 15.7% were Hispanic. It should be noted that this demographic distribution is not representative of the District's overall population.

Of the total population of White students, 85.1% of them have an IEP. Of the total Hispanic population, 12.2% have an IEP.

FIGURE 35: PERCENTAGE OF LAKEWOOD STUDENTS WITH DISABILITIES (AGE 3-4) BY RACE/ETHNICITY, 2022
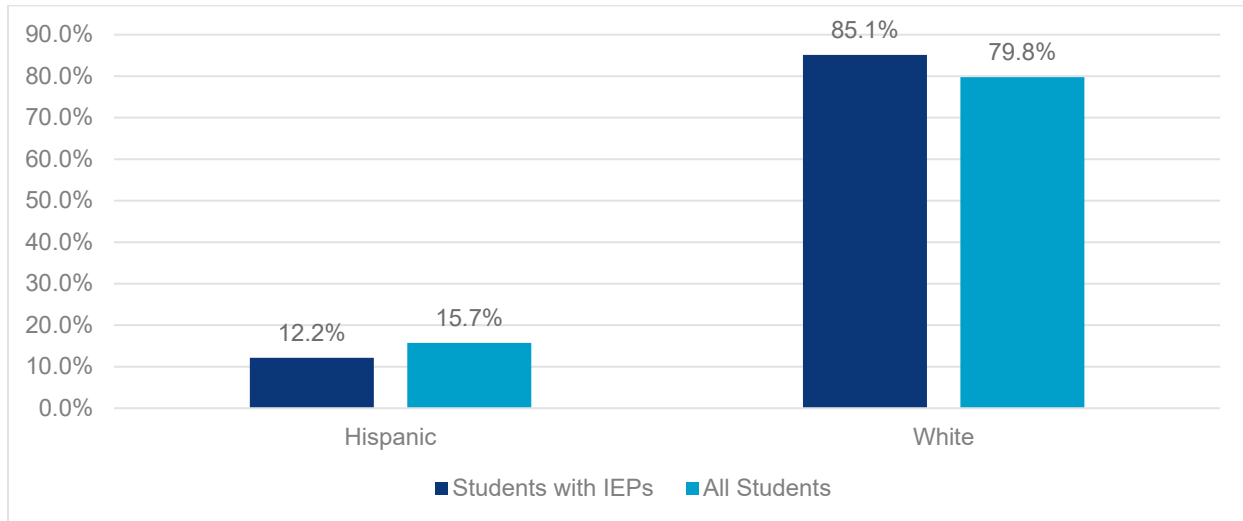
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Of the total three-to-four year old population, 31.5% are eligible for Free/Reduced Lunch. Of preschool students with a disability, 29.7% are eligible for Free/Reduced Lunch. It should be noted that these rates are not representative of the District's overall Free and Reduced Lunch Rates.

FIGURE 36: PERCENTAGE OF LAKEWOOD STUDENTS WITH DISABILITIES (AGE 3-4) BY FREE/REDUCED LUNCH, 2022
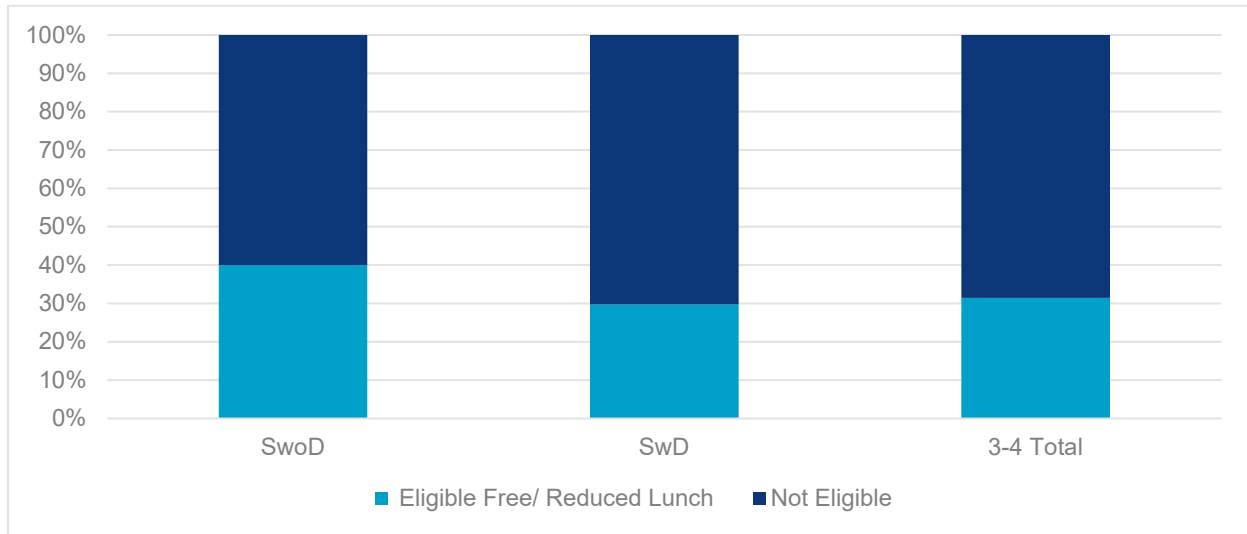
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

School-Age Incidence Rates

Between 2019-20 and 2021-22, the percentage of students with IEPs ages 5-21 in the District varied between a low of 26.1 percent in 2019-20 to a high of 28.8 percent in 2021-22. Compared to the state incidence rate during that same period, Lakewood's incidence rate averaged 9.97 percentage points higher.[66]

FIGURE 37: PERCENTAGE OF LAKEWOOD STUDENTS WITH IEPS COMPARED TO STATE INCIDENCE RATES, 2019-2020 TO 2021-2022[67]
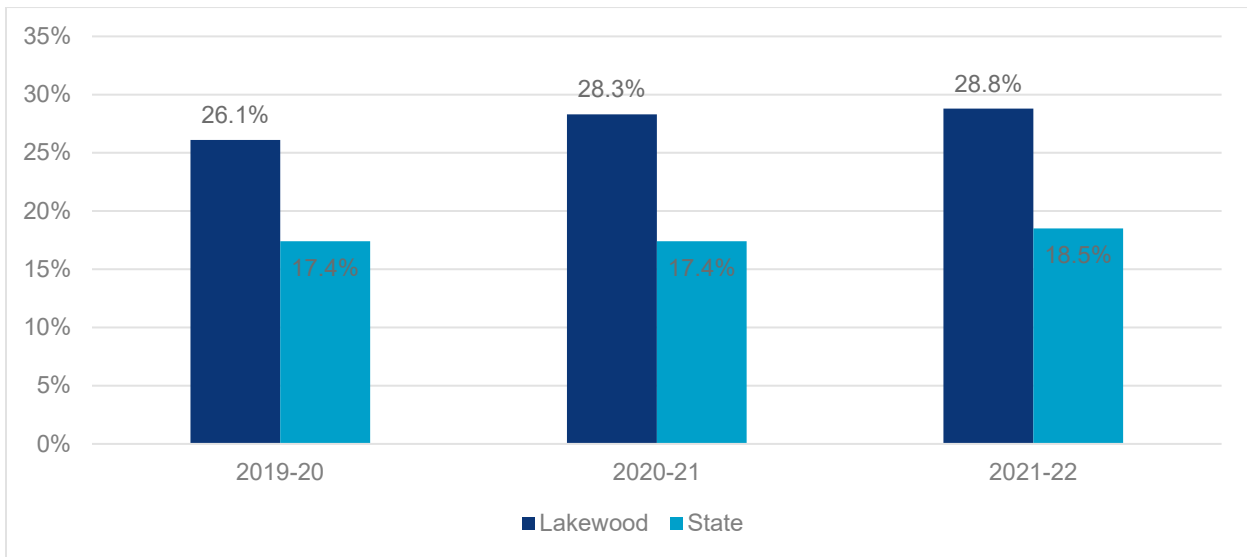
Note: Retrieved from "NJ School Performance Report", by District and State Data, 2024, (https://rc.doe.state.nj.us/)

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[66] These rates do not include eligible students enrolled in schools.
[67] *District and State Data for 2019-20 to 2021-22* (n.d.). NJ School Performance Report. Accessed Jan 2024, https://rc.doe.state.nj.us/.

PCG identified four New Jersey school Districts to compare key quantitative data to Lakewood Public School District. When compared to the identified comparison Districts, Lakewood had the highest incidence rate (28.8%), followed by Brick Township (20.1%) and Toms River RSD (19.6%). These averages were above the state average of 18.5 percent. The remaining two comparable Districts, Jackson Township and Jersey City, had incidence rates below the state average. (**Figure 38**)

FIGURE 38: LAKEWOOD'S IEP RATES COMPARED TO OTHER NEW JERSEY SCHOOL DISTRICTS AND STATE, 2022
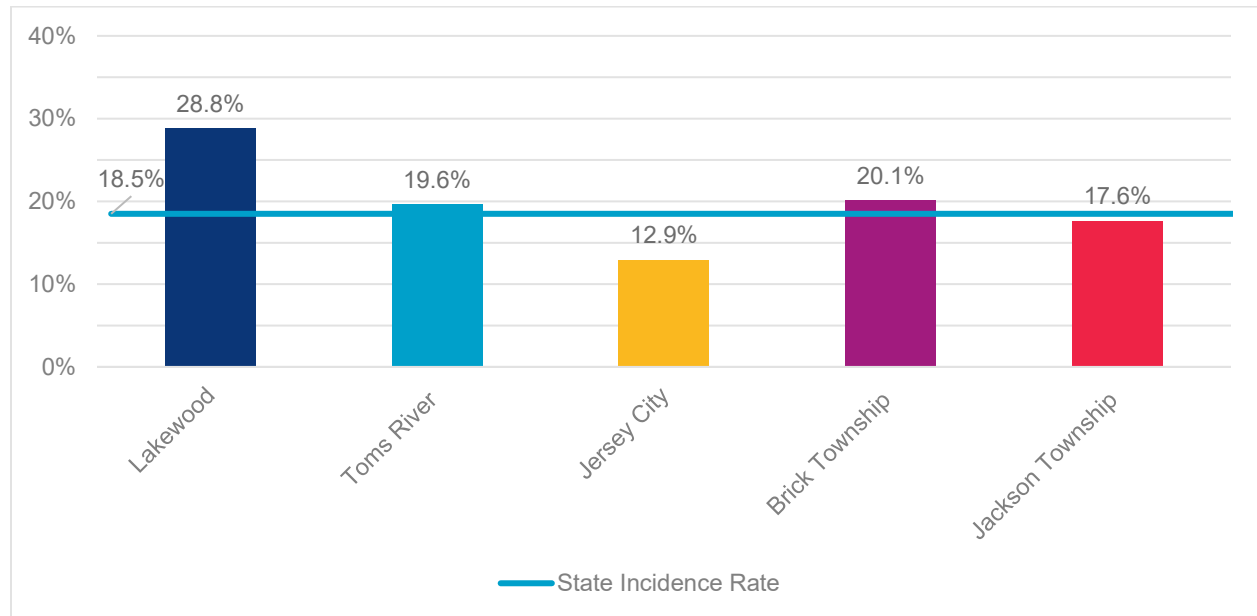
Note: Retrieved from "NJ School Performance Report", by District and State Data, 2024, (https://rc.doe.state.nj.us/)

INCIDENCE RATES BY PRIMARY DISABILITY

Of students with IEPs in Lakewood Public School District:

- 29.4 percent had a specific learning disability,
- 18.1 percent had a speech or language impairment,
- 17.2 percent had an other health impairment,
- 10.8 percent had an intellectual disability,
- 9.7 percent had autism, and
- 2.4 percent had an emotional disability.[68]

There are a few data comparisons to note regarding incidence rates.

- Lakewood Public School District's overall incidence rate (28.8%) is <u>nearly twice</u> the national incidence rate (14.7%). Similarly, the rate of students in the District with a diagnosis of Intellectual Disability (10.8%) is <u>nearly twice</u> the national rate (5.9%).
- Conversely, the District's Emotional Disability rate is <u>less than half</u> of the national rate.

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[68] Where appropriate, PCG utilizes disability categories aligned to federal definitions. New Jersey uses the term Emotional Regulation Impairment instead of the federal category term Emotional Disturbance. PCG slightly deviates from the federal category and uses the term Emotional Disability.

FIGURE 39: PERCENTAGE OF LAKEWOOD STUDENTS WITH DISABILITIES DISABILITY AREA COMPARED TO STATE AND NATION (AGES 5-21), 2022

	All disabilities	Autism	Emotional Disability	Intellectual Disabilitiy	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment
■ Lakewood	28.8%	9.7%	2.4%	10.8%	17.2%	29.4%	18.1%
■ State	18.5%	11.1%	2.8%	2.4%	22.0%	31.6%	23.4%
■ Nation	14.7%	12.2%	4.6%	5.9%	15.4%	32.4%	19.0%
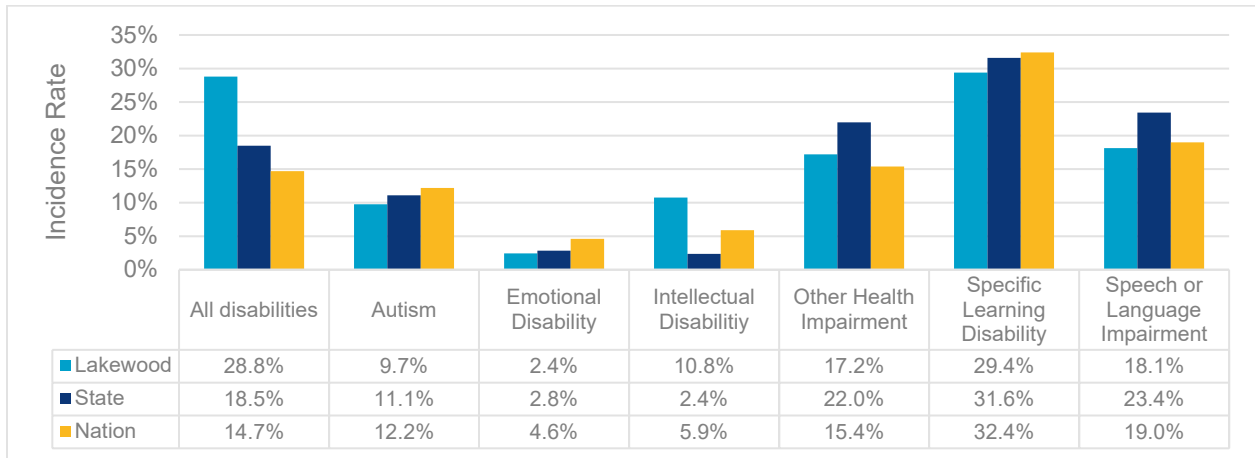
Note: Data are from "2022 Special Education Student Count Districts and Charters by Disability" provided by New Jersey Department of Education
Note: National Data obtained from National Center for Education Statistics '2022 Digest of Education Statistics', https://nces.ed.gov/programs/digest/d22/tables/dt22_204.30.asp

INCIDENCE RATE BY RACE AND ETHNICITY[69]

Of students with IEPs in the District in 2022:

- 67.0 percent were Hispanic,
- 25.9 percent were white, and
- 6.5 percent were Black/African American.

There are a few data comparisons to note regarding incidence rates specific to race and ethnicity.

- 84% of all students in Lakewood identify as Hispanic. Of this demographic, 67% have an IEP.
- 9.8% of all students in Lakewood identify as White. Of this demographic, 25.9% have an IEP.
- 5.9% of all students in Lakewood identify as Black or African American. Of this demographic, 6.5% have an IEP.

Monitoring comparisons in race and ethnicity across populations of students who have IEPs can serve as one method of proactively identifying possible instances of disproportionate representation.

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[69] Incidence data was suppressed for the following Race and Ethnicity populations in this section due to sample sizes <5: American Indian or Alaskan Native, Asian, Native Hawaiian or Other Pacific Islander.

FIGURE 40: PERCENT OF LAKEWOOD STUDENTS WITH IEPs (AGE 5-21) BY RACE/ETHNICITY, 2022
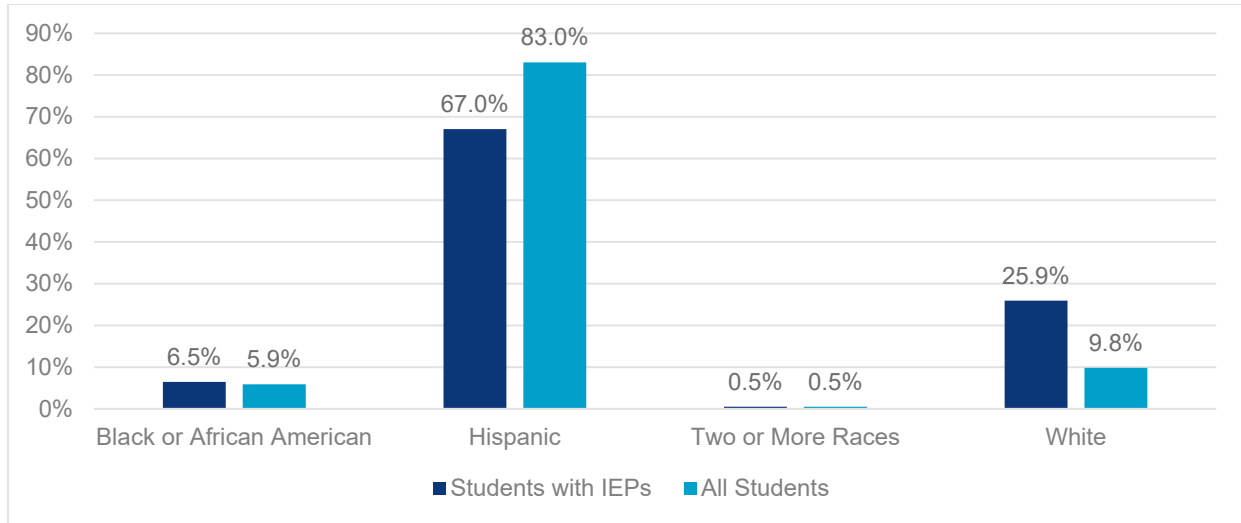
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Data indicated the prevalence of disability types for certain races and ethnicities higher than District demographics, with variations in disability categories. Key differences, displayed in the graph below, include:

- Hispanic students accounted for 91.0 percent of students identified with a specific learning disability and 88.2 percent of students with a speech or language impairment. These percentages were higher than the overall percentage of Hispanic students with an IEP (67.0%).
- White students accounted for 57.3 percent of students with an intellectual disability and 37.5 percent of students with autism. These percentages were higher than the overall percentage of white students with an IEP (25.9%).
- Black or African American students accounted for 17.6 percent of students identified with an emotional disability and 12.1 percent of students identified with an other health impairment. These percentages were higher than the overall percentage of Black or African American students with IEP (6.5%).

FIGURE 41: PERCENTAGE OF LAKEWOOD STUDENTS (AGE 5-21) BY DISABILITY AREA AND RACE/ETHNICITY, 2022
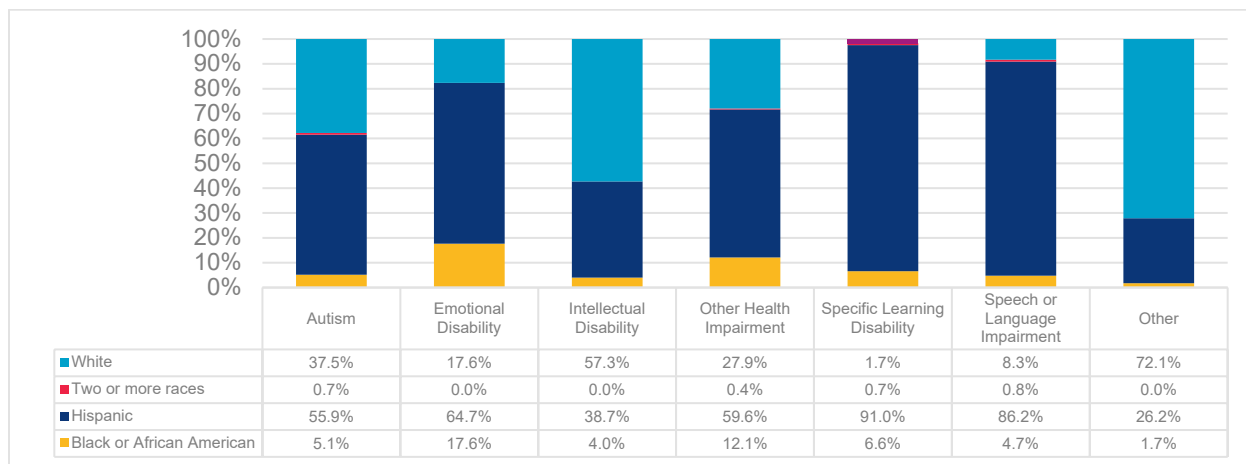
	Autism	Emotional Disability	Intellectual Disability	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment	Other
White	37.5%	17.6%	57.3%	27.9%	1.7%	8.3%	72.1%
Two or more races	0.7%	0.0%	0.0%	0.4%	0.7%	0.8%	0.0%
Hispanic	55.9%	64.7%	38.7%	59.6%	91.0%	86.2%	26.2%
Black or African American	5.1%	17.6%	4.0%	12.1%	6.6%	4.7%	1.7%

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

DISPROPORTIONALITY AND RISK RATIO ANALYSIS

One of the most useful, informative, and proactive methods used to calculate disproportionality "is the risk ratio, which compares one racial/ethnic group's risk of receiving special education and related services to that of all other students."[70] The risk ratio can be used to calculate disproportionality at both the state and District levels. The analysis below is intended to provide Lakewood Public School District with a tool to calculate risk ratios in order to monitor trends and identify areas of concern.

The risk ratio tool tells school personnel how the risk for one racial/ethnic group compares to the risk for a comparison group.[71] It can be used to assess:

- How much more likely is it for students from one race or ethnicity group to be classified with a disability compared to all other students;
- How much more likely is it for students with disabilities from one race or ethnicity group to be suspended for more than 10 days compared to all other students;
- What the likelihood is that a student from a particular racial or ethnic group will be classified with a disability, be given a specific disability classification, or placed in a most restrictive environment;
- What the likelihood is that a student with a disability from a particular racial or ethnic group will be suspended for more than 10 days.

As a concept, "risk" looks at the general enrollment data for each racial group along with the number of students from that group who were identified for a specified category and calculates the likelihood that a student from that racial group would be found in that particular category. The general risk equation is as follows:[72]

FIGURE 42: RISK RATIO EQUATION

$$\text{Risk} = \frac{\text{Number of children from racial/ethnic group in disability category}}{\text{Number of enrolled children from racial/ethnic group}} \times 100$$

As shown below, a risk ratio greater than 2.0 for a racial/ethnic group indicates a higher risk of over-representation, while a risk ratio of less than 1.0 indicates a higher risk of under-representation. For the state of New Jersey, the threshold for identification of significant disproportionality for students based on placement, identification for special education and related services, and discipline is 3.0 for three consecutive years.

PCG conducted a risk ratio analysis of Lakewood Public School District data to identify areas where over-identification of students with disabilities based on disability, race, educational setting, and discipline may be occurring. The risk ratio calculated is not designed to replicate New Jersey's significant disproportionality reporting process.[73] The intent of this calculation is to provide a formative data point to assess the extent

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[70] Bollmer, J. Bethel, et al. (2007). Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level. The Journal of Special Education, Vol 41, Issue 3, pp. 186 – 198.
[71] Racial and Ethnic Disparities in Special Education: A Multi-Year Disproportionality Analysis by State, Analysis Category, and Race/Ethnicity, Office of Special Education and Rehabilitative Services, U.S. Department of Education, February 2016.
[72] PCG analyzed student populations with at least 30 students in a particular Race and Ethnicity group with an IEP and at least 10 students with a specific disability classification, aligned with New Jersey's application of minimum sample sizes and cell sizes.
[73] Further information about the state's significant disproportionality calculations and findings can be found in the section below.

to which identification rate and educational placement and behavior decisions are impacted by students' race and ethnicity and educational environment. This tool can be used to inform ongoing analysis and monitoring.

As displayed in the figure below:

- White students were over twelve times as likely to be identified with an intellectual disability (exceeding the state threshold), five and a half times more like to be identified with autism (exceeding the state threshold), and three and a half times as likely to be identified with an other health impairment (exceeding the state threshold) when compared to other race and ethnicity groups.
- Black or African American students were twice as likely to be identified with an other health impairment.
- Hispanic students were twice as likely to be identified with a specific learning disability.

FIGURE 43: RISK RATIOS BY RACE/ETHNICITY AND DISABILITY, 2023

	Black or African American	Hispanic	White
■ Autism	0.00	0.26	5.50
■ Emotional Disability	0.00	0.37	1.97
■ Intellectual Disability	0.00	0.13	12.32
■ Other Health Impairment	2.20	0.30	3.55
■ Specific Learning Disability	1.13	2.06	0.16
■ Speech/ Language Impairment	0.80	1.27	0.83

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot, Nov 2023", provided by Lakewood Public School District

SIGNIFICANT DISPROPORTIONALITY

In 2016, the United States Department of Education (USED) issued new Equity in IDEA regulations with regards to identifying Districts with significant disproportionality. These rules required states to develop a risk ratio threshold to be used in identifying Districts for significant disproportionality. New Jersey established a 3.0 risk ratio threshold that was used to identify Districts for significant disproportionality in the areas of placement, identification for special education and related services, and discipline.

Further, the IDEA requires each state to have in place a State Performance Plan (SPP) and Annual Performance Report (APR) evaluating the state's implementation of Part B of the IDEA and describing how each state will improve such implementation. Two of the indicators concern the disproportionate representation of specific racial/ethnic groups in special education.

- Indicator 9 – Percent of Districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification (20 U.S.C.1416(a)(3)(C)); and
- Indicator 10 – Percent of disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification (20 U.S.C. 1416(a)(3)(C)).[74]

New Jersey applies the same 3.0 risk ratio threshold to identify Districts with disproportionate representation. Districts identified with significant disproportionality are also identified with disproportionate representation. Data from the NJSmart October 15th snapshot and the Student Safety Data System (SSDS) are used for the risk ratio calculation.[75]

In September 2023, Lakewood Public School District was notified that NJDOE determined the District to be significantly disproportionate in the following areas:

- White students eligible for special education and related services under the Autism category
- White students eligible for special education and related services under the Intellectual Disability category
- Hispanic students eligible for special education and related services placed in general education for less than 40% of the day
- White students eligible for special education and related services placed in separate settings.

Districts that met the criteria for significant disproportionality and disproportionate representation of racial/ethnic groups in special education were required to complete a self-assessment in the fall of 2023.

The 2023 NJDOE findings were not the first time Lakewood Public School District was found to be significantly disproportionate. Previously, in 2022 Lakewood Public School District received notification that the District had to set aside 15% of its IDEA funding for Comprehensive Coordinated Early Intervening Services (CCEIS).[76] This directive, a requirement of IDEA when an LEA who has exceeded the 3.0 risk ratio threshold for three consecutive years, was based on a "a continued pattern of significant disproportionality."[77]

Table 27 shows a summary of significant disproportionality data provided by the NJDOE for Lakewood Public School District for 2020-21, 2021-22, and 2022-23.[78]

TABLE 27: SIGNIFICANT DISPROPORTIONALITY RISK RATIOS

		Total Enrolled General Education Students By Race	Total Classified Special Education Students By Race & Disability Category	Total Enrolled General Education Students By Other Races	Total Classified Special Education Students by Other Races & Disability Category	Risk Ratio
White - Autism	2020-21	640	47	5105	96	**3.91**
	2021-22	620	48	4833	105	**3.56**
	2022-23	587	49	4475	109	**3.43**

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[74] *IDEA Part B Regulations-Significant Disproportionality (Equity in IDEA) essential questions and answers.* (2016, December 19). US Office of Special Education Services. https://sites.ed.gov/idea/files/significant-disproportionality-qa-03-08-17.pdf

[75] Memo from NJDOE Director of Special Education (2022, September 17). Lakewood Public School District Superintendent.

[76] Under 34 CFR §300.646(b)(2) of the IDEA Part B, if a state identifies significant disproportionality based on race or ethnicity in a local school LEA (LEA), the LEA must allocate 15 percent of its total IDEA Part B award (Basic plus Preschool) towards the provision of Comprehensive Coordinated Early Intervening Services (CCEIS).

[77] In the following categories:
- White students with the disability category of Autism
- White students with an Intellectual Disability
- White students in Separate Settings
- Black students for Total Disciplinary Removals.

[78] "Lakewood Dispro Data" provided by NJDOE via email January 24, 2024.

White - Intellectual Disability	2020-21	640	69	5105	57	**9.66**
	2021-22	620	74	4833	56	**10.3**
	2022-23	587	78	4475	61	**9.75**

		Total Enrolled Classified Special Education Students By Race	Total Classified Special Education Students By Race & Placement Category	Total Enrolled classified Special Education Students By Other Races	Total Classified Special Education Students by Other Races & Placement Category	Risk Ratio
Hispanic - Less than 40%	2020-21	1174	453	606	77	3.04
	2021-22	1187	490	574	71	3.34
	2022-23	1111	442	540	68	3.16

		Total Enrolled Classified Special Education Students By Race	Total Classified Special Education Students By Race & Placement Category	Total Enrolled classified Special Education Students By Other Races	Total Classified Special Education Students by Other Races & Placement Category	Risk Ratio
Lakewood Township Overall	2020-21	509	309	1271	62	12.44
	2021-22	484	301	1277	64	12.41
	2022-23	434	299	1217	73	11.49

Note. Retrieved from "Lakewood Dispro Data", 2024, provided by New Jersey Department of Education

The identification of Lakewood as significant disproportionality in several areas dates to 2020, when the NJDOE ordered Lakewood to use 15% of its IDEA funding to address the overidentification of White students in four categories and Black students for total disciplinary removals. Lakewood appealed this decision, arguing that the State's decision to order the CCEIS set aside was "arbitrary and capricious because it was based upon factual errors and an improper methodology of calculation." On November 28, 2023, the Appellate Division ruled in favor of NJDOE, determining: "We reject Lakewood's argument that it should be permitted to divert only 15% of the portion of the IDEA grant allocated to public school students, rather than be required to divert 15% of its total IDEA grant. The relevant regulations and statutes do not allow the remedy Lakewood advocates."[79]

For FY 24, Lakewood was required to set aside $1,711,367 in Basic IDEA funding for CCEIS. This amount was allocated to salaries, benefits, and professional services. For Preschool IDEA funding, Lakewood set aside $114,877 for professional services for CEIS. The set aside was evident in the FY 24 IDEA application that PCG reviewed.[80]

Eligibility by Student Subgroup
English learners are more likely to be identified with specific learning disabilities and speech language impairment and less likely to be identified with other health impairments, autism, and emotional disturbance as compared to all school aged students served under IDEA, Part B.[81] Multilingual learners account for 11.8% of all students served under IDEA, Part B.[82]

Nationwide, nearly 45% of students identified as multilingual learners who have been dually identified as having a disability under IDEA, Part B, are classified as having a literacy-related disability known as a

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[79] *Superior Court, New Jersey Appellate Division Ruling, Docket No. A-0709-21.* (2023, November 27). Provided by the New Jersey Department of Education.
[80] IDEA application. (n.d.). Public Access. Retrieved from: https://njdoe.mtwgms.org/NJDOEGmsWeb/Logon.aspx
[81] OSEP fast facts. (n.d.). IDEA. https://sites.ed.gov/idea/osep-fast-facts-students-with-disabilities-english-learners
[82] Ibid.

specific learning disability.[83] This rate in New Jersey is 36%. Nearly 19% of multilingual learners nationwide are identified with speech or language impairments.

ELIGIBILITY BY EL STATUS

Twenty-nine percent of students in Lakewood Public School District are English learners. Of the students with IEPs, 25.9 percent are English learners.

FIGURE 44: PERCENT OF LAKEWOOD STUDENTS AGES 5-21 BY EL STATUS, 2022
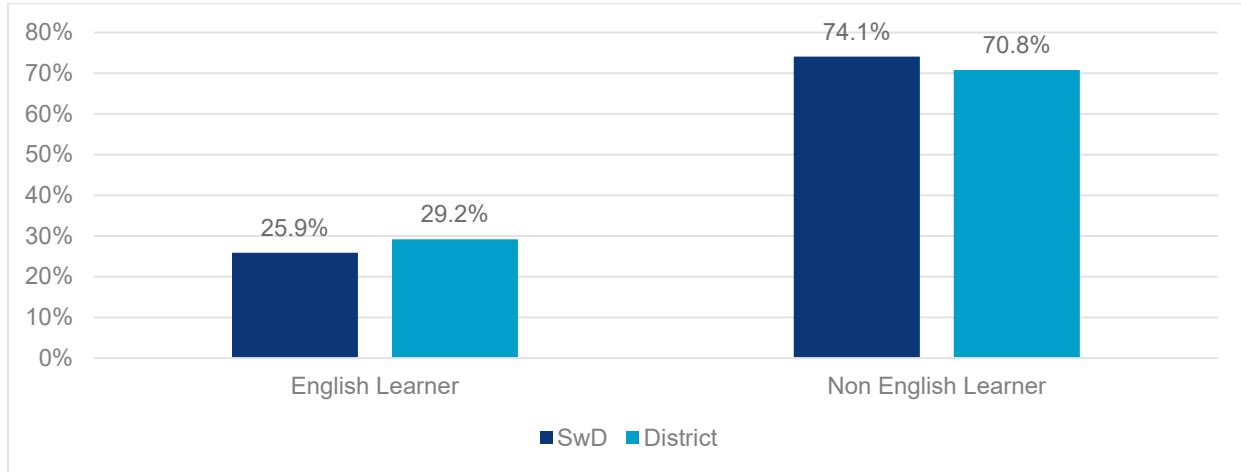
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

English learners with an IEP accounted for 46.6 percent of students with a speech or language impairment and 36.1 percent of students with a specific learning disability.

FIGURE 45: EL STUDENTS BY DISABILITY, 2022
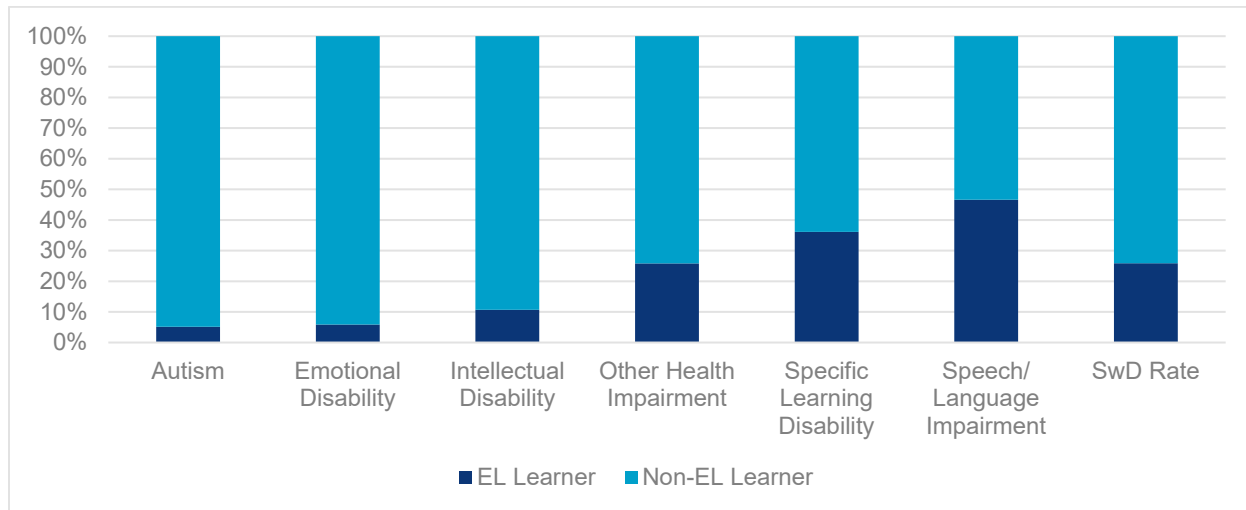
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

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[83] WIDA focus bulletin: identifying multilingual learners with specific learning disabilities. (n.d.). WIDA. https://wida.wisc.edu/sites/default/files/resource/FocusBulletin-Identifying-Multilingual-Learners-Specific-Learning-Disabilities.pdf#:~:text=Further%20investigation%20of%20those%20states%20with%20lower%20than,%284%25%29%3B%20Kentucky%20%284%25%29%3B%20Missouri%20%283%25%29%3B%20and%20Vermont%20%282%25%29.

ELIGIBILITY BY FREE OR REDUCED LUNCH

Overall, 79.4 percent of students in Lakewood are eligible for free or reduced-price lunch. A smaller percentage of students with disabilities were eligible for free or reduced-price lunch (69.7%) compared to their peers without an IEP (83.9%).

FIGURE 46: PERCENTAGE OF STUDENTS WITH DISABILITIES VS. STUDENTS WITHOUT DISABILITIES PARTICIPATING IN FREE AND/OR REDUCED LUNCH (AGES 5-21), 2022
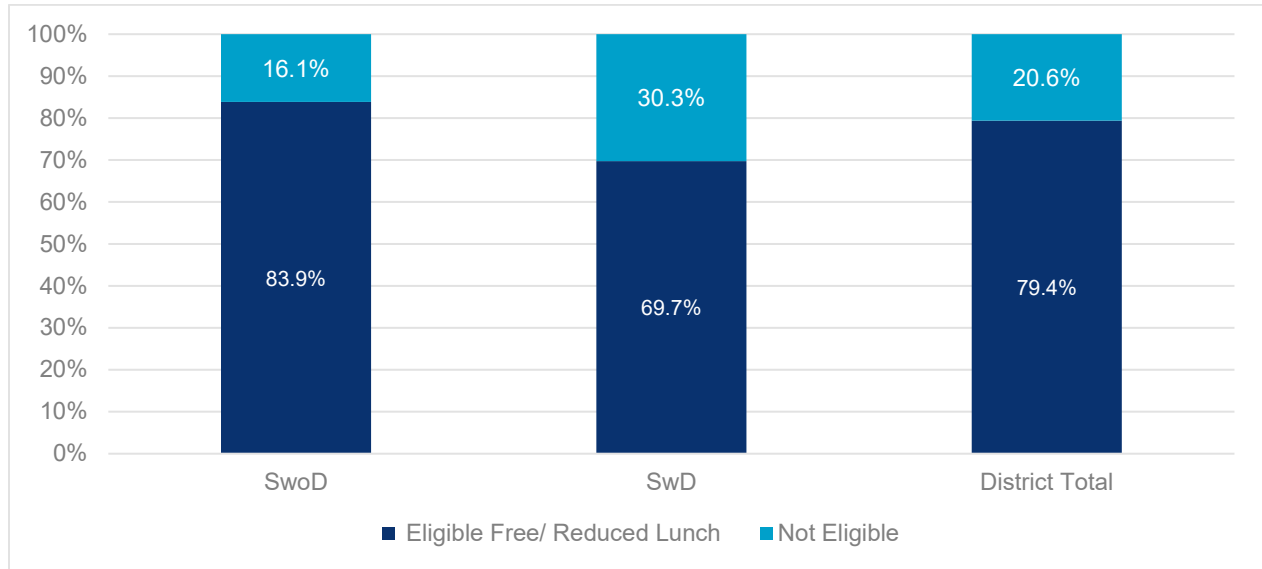
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot, Nov 2023", provided by Lakewood Public School District

ELIGIBILITY BY GIFTED STATUS

Overall, 4.3 percent of students in Lakewood are identified as gifted. A small percentage of students with disabilities (0.8%) are identified as gifted compared to 5.9 percent of students without an IEP. It should be noted that New Jersey does not have guidance around how to categorize or track this population of students, so comparisons are not possible.

FIGURE 47: PERCENTAGE OF STUDENTS IDENTIFIED AS GIFTED BY DISABILITY ELIGIBILITY, 2022
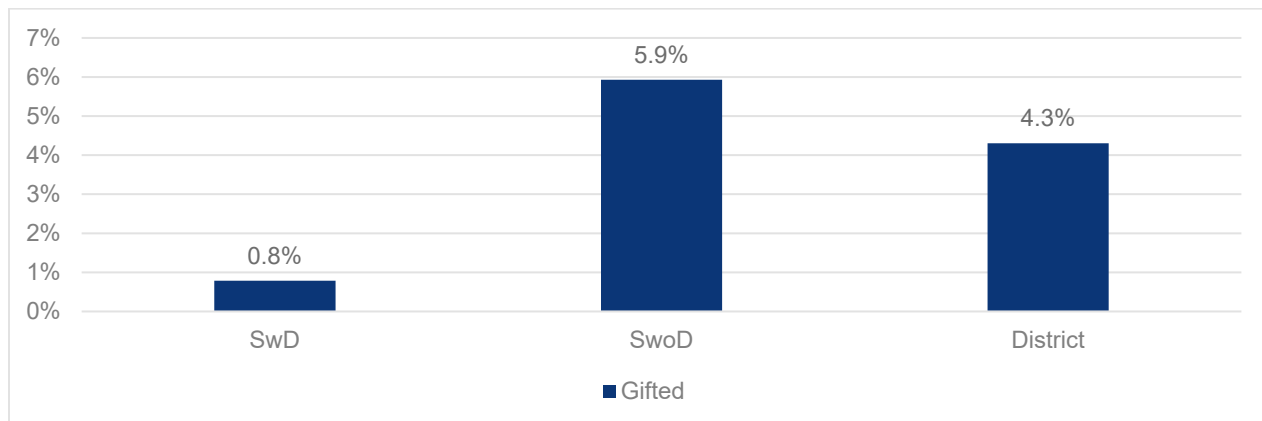
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Educational Setting

Of public-school students with IEPs in Lakewood, 37.3 percent spend 80 percent or more of their day in general education, 22.4 percent spend 40 to 79 percent of their school day in general education, 39 percent

spend less than 40 percent of their school day in general education, and 1.3 percent are in a separate setting.

These data defer substantially from data submitted in the 2021-22 State Performance Plan report, which lists that only 5.5% of students with IEPs in Lakewood spend 80 percent or more of their day in general education.[84]

FIGURE 48: PERCENTAGE OF LAKEWOOD STUDENTS (AGE 5-21) BY DISABILITY AREA AND EDUCATIONAL SETTING, 2022

	Autism	Emotional Disability	Intellectual Disability	Other Health Impairment	Other Disabilities	Specific Learning Disability	Speech or Language Impairments	District Overall
■ Separate	3.5%	25.0%	0.0%	0.6%	6.1%	1.0%	0.0%	1.3%
■ <40%	66.7%	0.0%	65.9%	26.4%	57.6%	20.8%	50.2%	39.0%
■ 40-79%	9.6%	12.5%	22.0%	23.3%	15.2%	33.0%	16.5%	22.4%
■ ≥80%	20.2%	62.5%	12.2%	49.7%	21.2%	45.2%	33.3%	37.3%

■ ≥80% ■ 40-79% ■ <40% ■ Separate

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Fifty percent of Black or African American students and 38.2 percent of Hispanic students are served in general education setting less than 40 percent of the day. This is contrasted with 59.6 percent White students served in general education greater than 80 percent of their school day.

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[84] State performance plan annual performance report. (n.d.). Department of Education. https://www.nj.gov/education/specialed/monitor/spp/

FIGURE 49: PERCENTAGE OF LAKEWOOD STUDENTS WITH DISABILITIES (AGE 5-21) BY RACE AND EDUCATIONAL SETTING, 2022[85]

	Black or African American	Hispanic	Two or more races	White	Overall
■ Separate	1.4%	1.0%	0.0%	6.4%	1.3%
■ <40%	50.0%	38.2%	70.0%	25.5%	38.9%
■ 40-79%	27.0%	23.1%	10.0%	8.5%	22.5%
■ ≥80%	21.6%	37.7%	20.0%	59.6%	37.4%

Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Within the Separate Setting category, Lakewood tracks students attending a specialized program for special education in a school that is not his/her/their resident school within the resident school District in a distinct category.

In Lakewood, during the 2021-22 school year, 171 students ages 3-4 were in specialized out of district placements. This is a decrease in placement numbers for this age group of 186 in 2019-20 and 199 in 2020-21.

During the 2022-23 school year, 333 students ages 5-21 were in specialized out of district placements. This is an increase in placement numbers for this age group from the 2020-21 school year (306) but a decrease from the 535 students in 2021-22.

Lakewood indicated that all of these placements are at Approved Private Schools for the Disabled (APSD) locations and were made through IEP team decisions. The District does not have any students in Naples Placements. Additional information about these placements can be found in the next section.

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[85] The 'n' size for Asian students was less than 5, so this demographic group was not included in the chart.

FIGURE 50: SPECIALIZED OUT OF DISTRICT PLACEMENTS, 2019-20 TO 2021-22
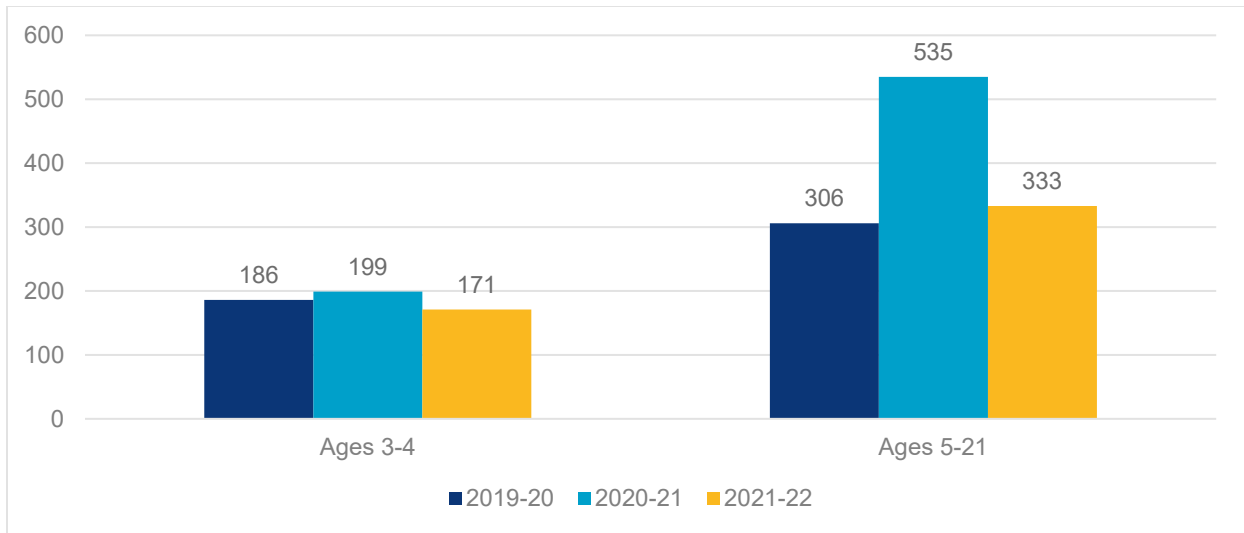
Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Approximately three-quarters of the students in specialized out of district placements are Hispanic, at 73.7% in 2020, 74.8% in 2021 and 77.9% in 2022. (This is slightly lower than the overall District incidence rate of Hispanic students with IEPs, which is 83%.) It is unclear from the information provided what prompted the substantial increase and then subsequent decrease in these placement numbers.

FIGURE 51: PERCENT OF SPECIALIZED OUT OF DISTRICT PLACEMENTS WITH IEPS (AGE 5-21) BY RACE/ETHNICITY, 2020-2022
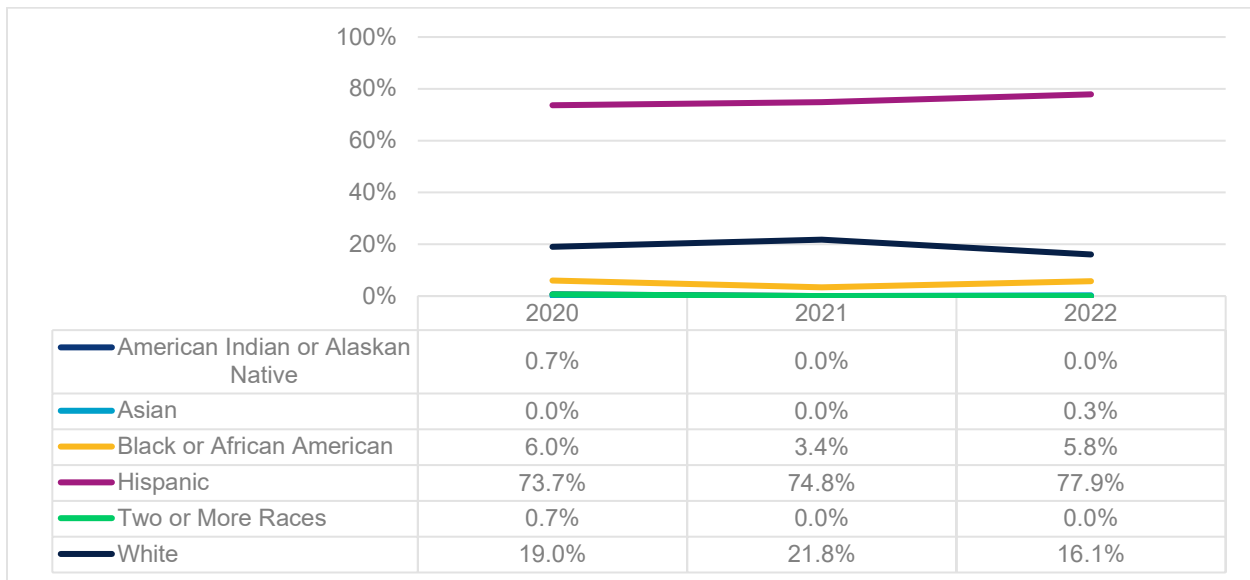
	2020	2021	2022
American Indian or Alaskan Native	0.7%	0.0%	0.0%
Asian	0.0%	0.0%	0.3%
Black or African American	6.0%	3.4%	5.8%
Hispanic	73.7%	74.8%	77.9%
Two or More Races	0.7%	0.0%	0.0%
White	19.0%	21.8%	16.1%

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

FIGURE 52: PERCENT OF SPECIALIZED OUT OF DISTRICT PLACEMENTS WITH IEPS (AGE 5-21) BY PRIMARY DISABILITY, 2020-2022
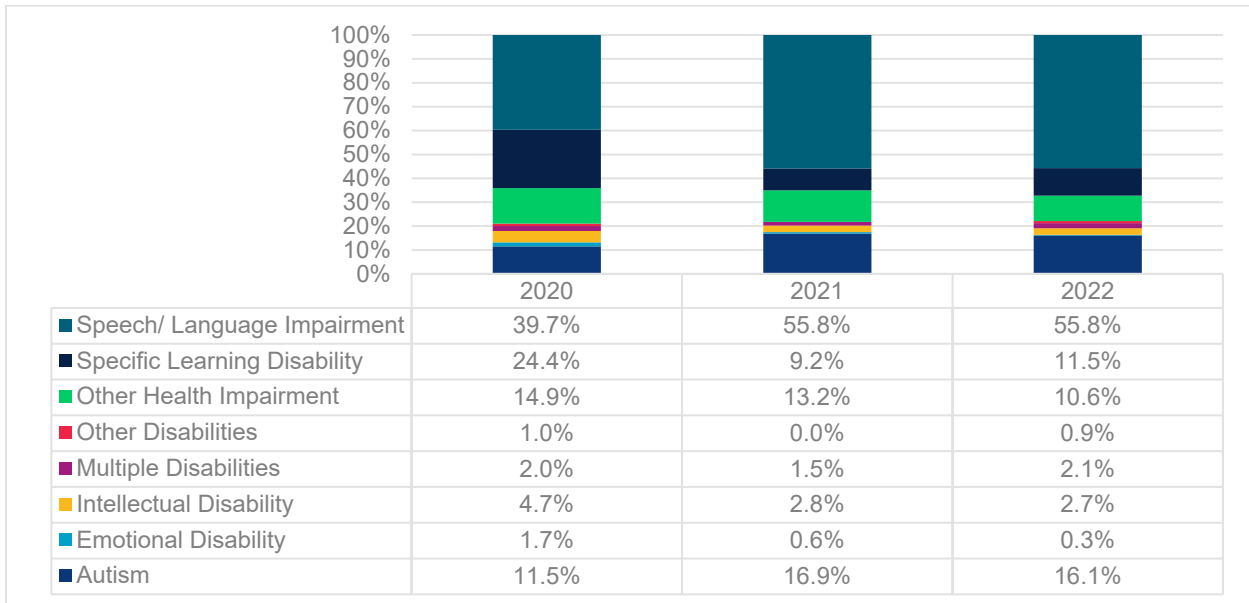
	2020	2021	2022
Speech/ Language Impairment	39.7%	55.8%	55.8%
Specific Learning Disability	24.4%	9.2%	11.5%
Other Health Impairment	14.9%	13.2%	10.6%
Other Disabilities	1.0%	0.0%	0.9%
Multiple Disabilities	2.0%	1.5%	2.1%
Intellectual Disability	4.7%	2.8%	2.7%
Emotional Disability	1.7%	0.6%	0.3%
Autism	11.5%	16.9%	16.1%

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

The majority of students in out of district placements across all three years were those with speech or language impairment as a primary disability. It is unclear why so many students with a primary disability of speech or language impairment are in specialized out of district placements; however, it could be that they have other secondary or tertiary disabilities as well.

FIGURE 53: PERCENT OF SPECIALIZED OUT OF DISTRICT PLACEMENTS WITH IEPS (AGE 5-21) BY GRADE, 2020-2022
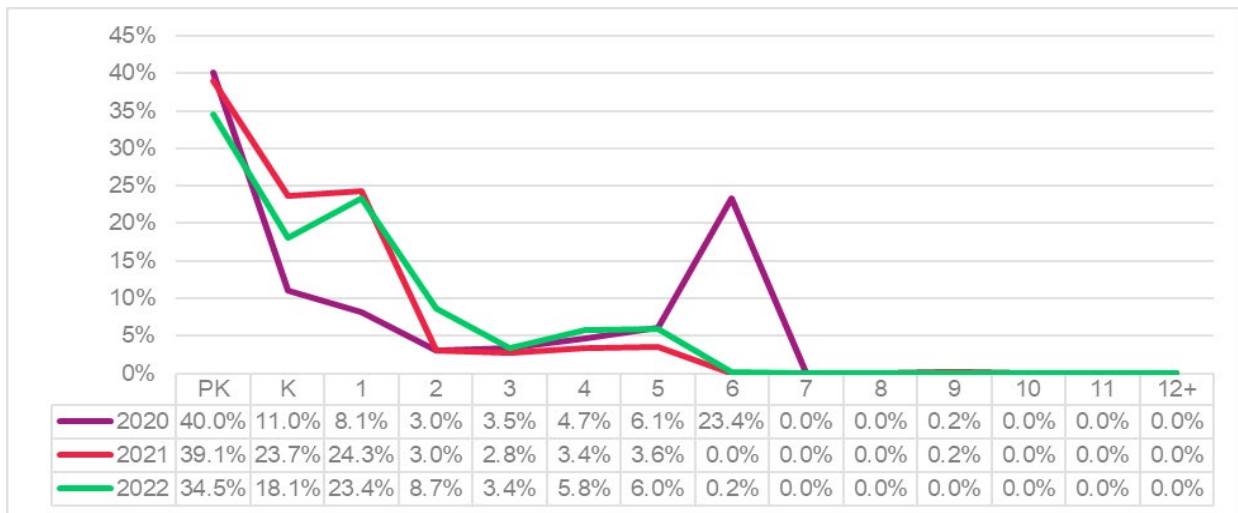
|	PK	K	1	2	3	4	5	6	7	8	9	10	11	12+
2020	40.0%	11.0%	8.1%	3.0%	3.5%	4.7%	6.1%	23.4%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%
2021	39.1%	23.7%	24.3%	3.0%	2.8%	3.4%	3.6%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%
2022	34.5%	18.1%	23.4%	8.7%	3.4%	5.8%	6.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Note. Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

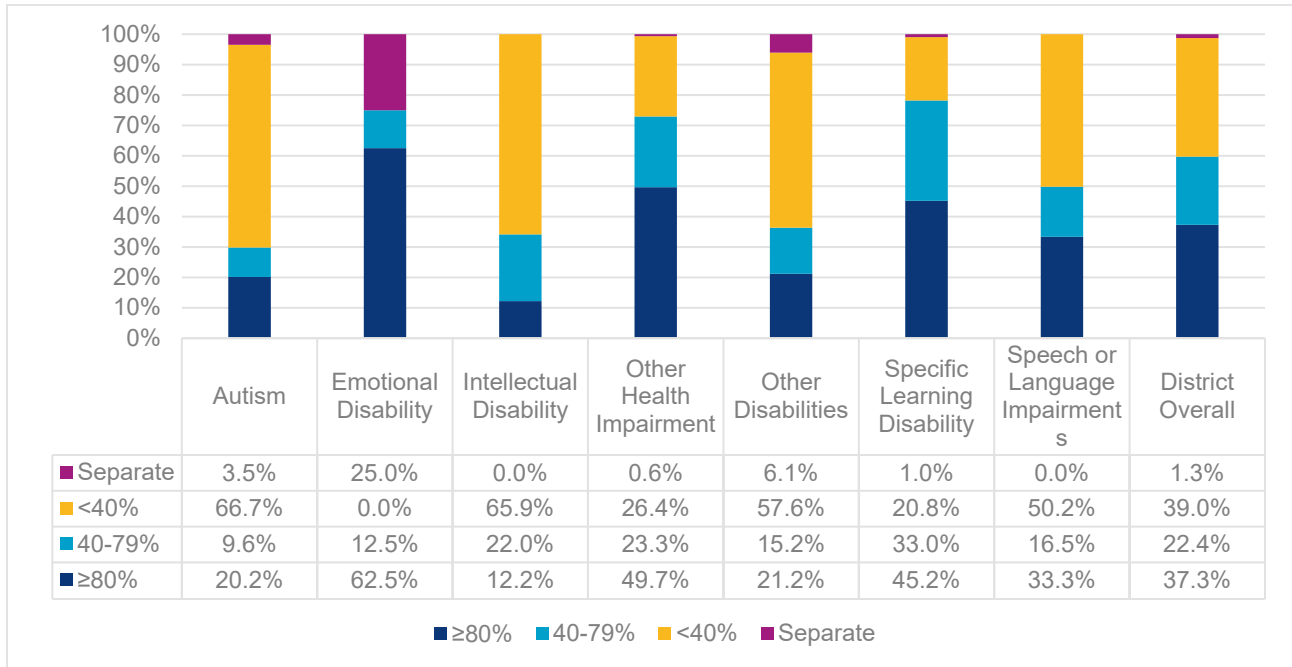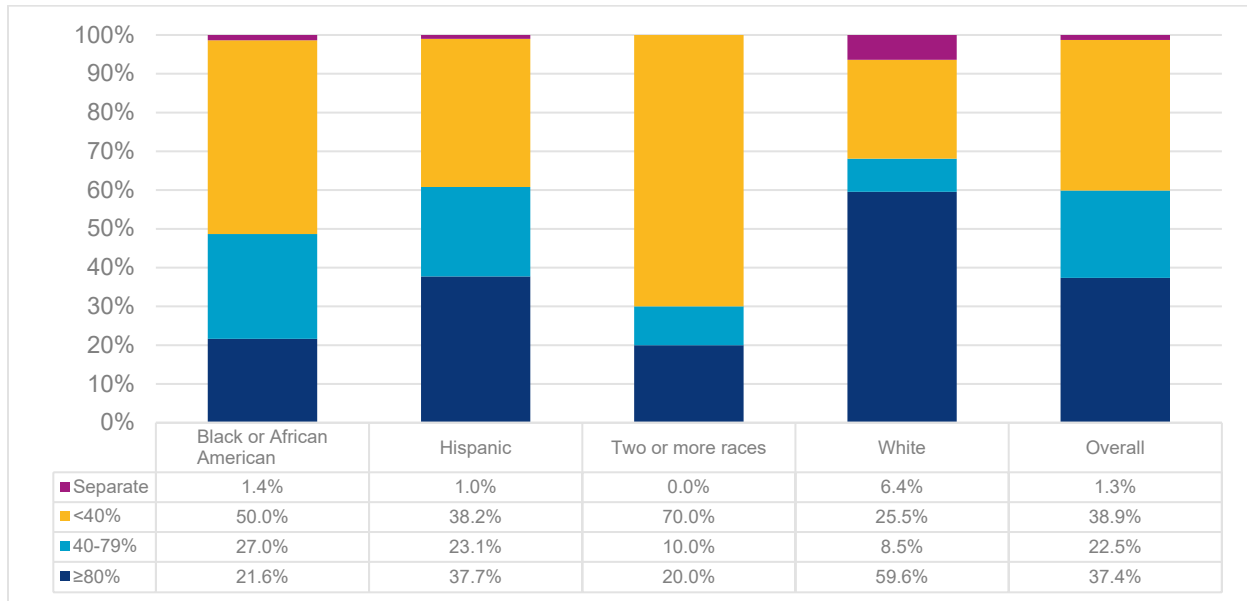The majority of students in these placements are in grades Pre-K to 6th grade.

TEACHING AND LEARNING FOR STUDENTS WITH DISABILITIES

This section of the report is devoted to how Lakewood is supporting teaching and learning for students with IEPs, and how the District provides specialized instruction, related services, and supplementary aids/services that enable students with disabilities to receive the educational benefits to which they are entitled.

While compliance indicators remain important, under the new Results-Driven Accountability (RDA) framework, the federal Office of Special Education Programs (OSEP) has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change is based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.[86] This shift is having a great impact in guiding the priorities of special education department nationwide, including in Lakewood. Districts need both to raise the level of and access to high levels of rigor, and also to generate a culture of academic optimism.[87]

These issues have become even more significant with the March 27, 2017 U.S. Supreme Court decision in *Endrew F. v. Douglas County School District*.[88] In this decision, the Court updated its prior standard for determining a school District's provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable each student to make academic progress and functional advancement and advance from grade to grade. Progress for a student with a disability, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of his/her circumstances. Furthermore, yearly progress must be more demanding than the "merely more than de minimis" standards that had been used by some lower courts. For children with disabilities, receiving instruction that aims so low would be tantamount to "sitting idly . . . awaiting the time when they were old enough to 'drop out.'"[89] The Court made it clear that IDEA demands more. The recommendations in this report serve to bolster the OSEP's recent shift toward improving instructional outcomes.

Eligibility and Evaluation

In New Jersey, when a child is identified as possibly having a disability, their matter is referred to the District's special education administration who then subsequently refers it to the District's Child Study Team (CST). Referrals may be submitted by instructional, administrative and other professional staff of the local school District, or parents and state agencies, including the New Jersey Department of Education (NJDOE), concerned with the welfare of students.[90]

Lakewood Public School District has clearly documented policies and procedures related to the referral process and a designated email address

FIGURE 54: LAKEWOOD INTERVENTION TIERS

(referrals@lakewoodpiners.org) for all referrals to the Child Study Team (CST) from parents, teachers, early intervention providers, administrators, and school staff. There is also a link to a document on the Lakewood website regarding Project CHILD FIND, a free referral service and statewide public awareness campaign to assist in the identification of unserved/underserved youth with a delay or disability from birth through twenty-one years of age. Project CHILD FIND develops and distributes information to the public about early intervention services and special education programs throughout New Jersey.[91] The graphic in Figure 54, from the District's 2022-23 Intervention Manual, depicts the process through which intervention support and referral to the CST occur.

The District outlined the following process for Initial Referrals.

District Process: Initial Referrals[92]

The District has 20 days from the receipt of a referral to hold an Initial Determination Meeting. Upon receipt of the referral, the Office of Special Services will assign a Case Manager to ensure the meeting occurs within 20 days. The following shall occur:

- *For K-12 the Case Manager will notify the Child Study Team Secretary of the day and time of the meeting. The Child Study Team Secretary will contact the parent via phone. The meeting shall be scheduled as soon as possible to allow for and in anticipation of the parent not being available for the meeting. This will allow for the District to schedule another meeting and maintain compliance. All information must be documented in Realtime case notes. Ex: Parent no show; Parent not available and needs to reschedule….*
- *The Child Study Team Secretary will call the parent to inform them of the day and time of the meeting.*
- *The Child Study Team Secretary will send out a meeting notice reflecting the day and time of the meeting.*
- *The Child Study Team Secretary will call the parent to confirm the day before the meeting.*
- *The Child Study Team Secretary will notify building administration of the meetings and which teachers are required to participate.*
- *The Child Study Team Secretary will notify the teachers that are required to attend three business days prior to the meeting.*
- *Both Child Study Team Secretary and Case Managers will coordinate so multiple meetings will be scheduled on one day to maximize substitute coverage.*
- *The Child Study Team Secretary will coordinate substitute coverage of the meetings.*
- *The Child Study Team Secretary will coordinate translators for the meetings.*

Child Study Team members from other buildings may be utilized to ensure the District is compliant with meeting this mandate.

Additionally, the District's 2023 staff handbook outlines the procedures to follow for initial referrals.

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[91] Project Child Find Information, retrieved from: Project Child Find.pdf (lakewoodpiners.org)
[92] "Referral Process" provided by Lakewood Public School District.

FIGURE 55: LAKEWOOD PUBLIC SCHOOL DISTRICT HANDBOOK, SPECIAL EDUCATION AND RELATED SERVICES[93]

LAKEWOOD PUBLIC SCHOOLS　　　**LAURA A. WINTERS Ed.D, SUPERINTENDENT**　　**August 13, 2023**

SPECIAL EDUCATION AND RELATED SERVICES
Referral

What is a referral?
A referral is a written request for an evaluation that is given to the school district when a child is suspected of having a disability and might need special education services.

Who can make a referral?
- ☐ Parent
- ☐ School personnel
- ☐ Agencies concerned with the welfare of students, including the New Jersey Department of Education.

If you believe that your child may have a disability, you may refer your child for an evaluation by submitting a written request to your school district.

What happens when a referral is made?
Within 20 calendar days of receiving a referral, the school district must hold a meeting to decide whether an evaluation will be conducted. If an evaluation will be conducted, another decision is made about the type of testing and other procedures that will be used to determine the nature and scope of the evaluations. If an evaluation will not be conducted, recommendations may be made with respect to interventions or services to be provided the student in general education.

Decision-Making and Participation in Meetings
How are decisions made about your child's special education needs?
Decisions regarding your child's special education needs are made at meetings. As the parents of a child who has or may have a disability, you have the right to participate in meetings regarding:

- ☐ Identification (decision to evaluate or not)
- ☐ Evaluation (nature and scope of assessment procedures)
- • Classification (determine whether your child is eligible for special education and related services)
- ☐ Development and review of your child's individualized education program (IEP)
- ☐ Educational placement of your child
- ☐ Reevaluation of your child

You are considered a member of the multi-disciplinary team of qualified persons who meet to make these determinations and develop your child's individualized education program (IEP).

Intervention and Referral Service procedure (I&RS)
The School Building's Intervention and Referral Services assist **Regular Education** and **Special Education** teachers to offer support and works with students with learning and/or behavior problems who may require additional support.
The I&RS team helps classroom teachers by:

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Note. Retrieved from "Staff Handbook" provided by Lakewood Public School District.

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[93] "Staff Handbook" provided by Lakewood Public School District.

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LAKEWOOD PUBLIC SCHOOLS   **LAURA A. WINTERS Ed.D, SUPERINTENDENT**   **August 13, 2023**

☐ Providing an efficient and effective means of assistance
☐ Providing peer support
☐ Providing a vehicle to share their expertise in working with a variety of learning and behavioral problems with all students – Regular and Special Education.
☐ Offering structured support and assistance by suggesting instructional strategies to promote pupil competence
☐ Enabling the school's instructional program to meet a broader range of pupil needs.

Parental Requests: While parents have a right to request a Child Study Team Evaluation, we have a responsibility not to enlist parent requests.

Private CST Evaluations: Evaluations completed by a private Child Study Team at the parents' request must be submitted to the Principal who will forward it to the Child Study Team.

Speech Referrals: New referrals should be addressed with the Speech Therapists and Counselors.

SECTION 504

Processed by the building administrator and the Guidance Counselor
Individual 504's for students must be updated and revisited each year. They are <u>not</u> automatically renewed. 504's cannot be used just for testing nor written and developed just prior to testing. In addition, the provisions of the 504 must be implemented every day to avoid legal ramifications. We do not want to be accused of failing to implement.
☐ Please review and implement existing 504 plans.
☐ Begin thinking about revising and updating new 504 plans.
☐ By November of each school year, all revised and updated 504's should be in place and signed off by parents.

☐ By January of the same school year, all brand new 504's (except for transfers) should be in place and signed off by parents.

STATE RESIDENCY REQUIREMENT

NJ First Act, N.J.S.A. 52:14-7 (Act) effective September 1, 2011. It provides that "every person holding office, employment, or position with … a school district… shall have his / her Principal address within the State." New employees are entitled to a grace period of one (1) year from the date of hire to comply with the residency requirement.

There is a "grandfather clause" for existing staff members employed in the District as of September 1, 2011 and who, as of that date, resided outside of New Jersey.
Please note that staff members who were employed in the District but actually resided in New Jersey as of September 1, 2011 are <u>not</u> exempt from the residency requirement.

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Note. Retrieved from "Staff Handbook" provided by Lakewood Public School District.

During the 2022-23 school year, the CST received 841 referrals for special education. As of November 2023, there were 319 referrals for the 2023-24 school year.[94] General observations of these data show that the majority of referrals are from Early Intervention and parents, with far fewer coming from schools. Deeper

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[94] Referral Data" (n.d.). Lakewood Public School District.

analysis of these data was not possible given the format of the information provided. However, considering the total number of identified students with disabilities in Lakewood's public schools is 1,395, this referral number is high. It is unclear if these numbers are also inclusive of students who are parentally placed in nonpublic schools and could potentially be evaluated through Chapter 193.

District Practices

Staff shared a range of feedback about students who were referred for an evaluation, or, in some cases, about students they believe should have been referred sooner. Some focus group participants indicated that, from the perspective of helping the students in any way possible, everyone works together to go above and beyond to ensure students are getting serviced and receiving the services they need through testing and that there is validity in how students are chosen and recommendations provided through I&RS. One another positive note, staff shared in focus groups that Spanish bilingual evaluations do not create challenges, as testing is done in both languages and there are staff dedicated to them. There may be challenges with other languages, however.

Others focus group participants shared divergent views, in that they question the eligibility criteria and whether determinations are accurate. There reportedly have been cases in which parents believe their children have not been properly evaluated. Further, focus group participants shared that there is also a perception that that the administration is focused more on data, numbers, and classification rates than children. Decisions are reportedly heavily influenced by data analysis rather than a comprehensive consideration of individual student needs. According to some, the identification process is long, and there are children who will go multiple grades without support. Their needs may be great by the time an evaluation occurs. There is a recognition, however, that it is a balance to implement MTSS with fidelity and not overidentify students as well.

The work of the CSTs is overseen by the Supervisor of CST. During the 2021-22, there were 33 CST members across the District, with FY22 actuals for CST expenses totaling $4,538,157.[95] According to focus group participants, these CST members only support students within Lakewood Public School District and do not work with nonpublic schools.

Early Childhood Special Education Services

Lakewood Public School District has the Lakewood Early Childhood Center (LECC) where most of its Preschoolers with Disabilities population is located. The District offers both general education, in-class resource (ICR), and separate class settings. In the separate class setting, it was reported that Applied Behavior Analysis (ABA) protocol is followed. Teachers reported they use the Creative Curriculum.

PCG visited two classrooms in the LECC. Both were bright, organized, and children were highly engaged. The LECC is in a complex of three campuses of modular-trailer classrooms, two of which are interconnected. Campus 1 has ABA and self-contained classes, and Campus 2 has 2 self-contained and transitional K. Campus 2 is not interconnected.

Within the interconnected trailers, the District has installed PT equipment in a separate setting and in a Snoezelen Multi-Sensory Room. The campus is also equipped with pre-school sized bathrooms. However, it was reported on multiple occasions that having the preschool program in modular trailers is not ideal. Staff said that they can easily become noisy, and the layout of the classrooms can be precarious because of the space limitations of a trailer.

One unique element of Lakewood Public School District's early childhood programming is the age of its students. Lakewood allows children at age four to exit preschool and start kindergarten. This is highly unusual as most other kindergarten students with disabilities across the state start preschool at age five, at the earliest.

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[95] "CST Staff Data" provided by Lakewood Public School District. Funding information retrieved from the Lakewood User Friendly Budget book: https://www.nj.gov/education/finance/fp/ufb/2022/reports/29/2520/UFB23_2520.pdf

School Age Special Education Services

In New Jersey, several types of supplementary instruction and special class programs exist.

According to NJAC 6A:14-4.6, supplementary instruction "…is provided to students with disabilities in addition to the primary instruction for the subject being taught. The program of supplementary instruction shall be specified in the student's IEP."[96] It includes in-class resource programming, pull out resource programming and pull-out replacement programming:

- **In-Class Resource (ICR)**: In-class resource programs and pull-out replacement resource programs are programs of specialized instruction organized around a single subject and are provided to students with disabilities by an appropriately certified teacher of students with disabilities. Instruction in more than one subject may be provided in a pull-out resource program.
- **Pull-Out Replacement and Pull-Out Resource (POR)**: Pull-out replacement resource programs are programs of specialized instruction organized around a single subject and are provided to students with disabilities by an appropriately certified teacher of students with disabilities. Pull-out replacement resource programs are programs of specialized instruction organized around a single subject and are provided to students with disabilities by an appropriately certified teacher of students with disabilities. More than one subject may be provided in a pull-out resource program. In Lakewood Public Schools, Pull-Out Replacement occurs in the middle and high school settings; Pull-Out Resource occurs at the elementary schools.

According to NJAC 6A:14-4.7, a special class program shall serve students who have similar intensive educational, behavioral, and other needs related to their disabilities in accordance with their IEPs. Placement in a special class program shall occur when the IEP team determines that the nature and severity of the student's disability is such that no other school-based program will meet the student's needs. Special class programs shall offer instruction in the New Jersey Student Learning Standards unless the IEP specifies a modified curriculum due to the nature or severity of the student's disability. The general education curriculum and the instructional strategies may be modified based on the student's IEP.[97] The Administrative Code offers several settings that include requirements on the maximum number of students and as well as teachers and classroom aides present. The following abbreviations for settings along the continuum are included below:

- **Language and Learning Disability (LLD).** Special class programs for students with learning and/or language disabilities may be organized around the learning disabilities or the language disabilities or a combination of learning and language disabilities.
- **Multiple Disabilities (MD).** Special class for students with multiple disabilities, when the combination of those disabilities causes such severe educational needs that they cannot be accommodated in a program designed solely to address one of the impairments.
- **Emotional Regulation Impairment (ERI).** Special class for students exhibiting one or more of the following characteristics over a long period of time and to a marked degree that adversely affects a student's educational performance due to: an inability to learn that cannot be explained by intellectual, sensory, or health factors; an inability to build or maintain satisfactory interpersonal relationships with peers and teachers; inappropriate types of behaviors or feelings under normal circumstances; a general pervasive mood of unhappiness or depression; or a tendency to develop physical symptoms or fears associated with personal or school problems
- **Autism (AUT).** Special class for students with severe to profound intellectual disabilities shall maintain a three to one student to staff ratio.
- **Visually Impaired (VI).** Special class for students that, even with vision correction, vision impairment adversely affects a student's educational performance.

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[96] New Jersey code NJAC 6A:14-4.6 special education. (n.d.). https://www.nj.gov/education/code/current/title6a/chap14.pdf
[97] Ibid.

Continuum of Services

Of the settings specified in Code, Lakewood provides the following continuum within its schools.

TABLE 28: SPECIAL EDUCATION CONTINUUM MAPPING, GRADES PK-6

	LECC (PK)	Piner School	Spruce Street School	Oak Street School	Clifton Avenue School	Ella G. Clark School
Special Education Setting	*Grade: PK*	*Grade: PK-K*	*Grade: 1*	*Grades: 2-6*	*Grades: 2-6*	*Grades: 3-6*
General Education	✓	✓	✓	✓	✓	✓
Preschool Disabilities (ABA) – Separate Classroom	✓					
ICR	✓	✓	✓	✓	✓	✓
POR				✓	✓	
LLD		✓	✓	✓	✓	✓
AUT		✓	✓	✓		
MD				✓		
Related Services[98]	✓	✓	✓	✓	✓	✓

Note. Retrieved from "Master Schedule Data" provided by Lakewood Public School District.

TABLE 29: SPECIAL EDUCATION CONTINUUM MAPPING, GRADES 7-12

	Lakewood Middle School	Lakewood High School
Special Education Setting	*Grades: 7-8*	*Grades: 9-12+*
General Education	✓	✓
ICR	✓ Math 7 and 8 ✓ ELA 7 and 8 ✓ Science 7 A 1, 7 A2, 7 A3, 7 B1, 7 B2, 7 B3, 8 D1, 8 D2 ✓ Social Studies 7 A1, 7 A2, 7 A3, 8 D1, 8 D2, 8 D3	✓ Geometry ✓ Algebra I ✓ Biology ✓ Horticulture ✓ English I ✓ English II ✓ English III
POR	✓ Math 7A, 7B, 8A, 8B ✓ ELA 7A, 7B, 8A, 8B ✓ Science 7A, 7B ✓ Social Studies 7A, 7B, 8A, 8B	✓ Geometry ✓ Algebra I ✓ Algebra II ✓ Physical Science ✓ Environmental Science
LLD	✓ ELA 7A and 7B ✓ ELA 8 ✓ Social Studies 7A, 7B	✓ Geometry L10 ✓ Algebra I L9 ✓ Algebra II L11 ✓ Physical Science ✓ English L9, American History ✓ World History
AUT	✓	✓ Language Arts ✓ Vocational/Career

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[98] Includes OT, PT, and Speech

		✓ Science ✓ Math ✓ Social Studies ✓ Life Skills
MD	✓	✓ Language Arts ✓ Vocational/Career ✓ Science ✓ Math ✓ Social Studies ✓ Life Skills
Related Services[99]	✓	

Note. Retrieved from "Master Schedule Data" provided by Lakewood Public School District.

TABLE 30: SPECIAL EDUCATION PROGRAMS BY TYPE AND NUMBER OF CLASSES PER GRADE LEVEL

2023-24 Special Ed Programs	Program	# Classes	Program	# Classes	Program	# Classes	Program	# Classes	Program	# Classes	Program	# Classes	Program	# Classes
PreK	Autistic	0	MD	0	LLD	0	ICR	3	POR	0	SELF CONTAINED	11	ICS	10
K	Autistic	2	MD	0	LLD	3	ICR	2	POR	0	SELF CONTAINED	0	ICS	3
Gr. 1-3	Autistic	4	MD	1	LLD	9	ICR	8	POR	1	SELF CONTAINED	0	ICS	10
Gr. 3-4	Autistic	1	MD	0	LLD	1	ICR	0	POR	2	SELF CONTAINED	0	ICS	0
Gr. 3-5	Autistic	0	MD	0	LLD	1	ICR	0	POR	0	SELF CONTAINED	0	ICS	0
Gr. 4-6	Autistic	1	MD	1	LLD	5	ICR	8	POR	5	SELF CONTAINED	0	ICS	9
Gr. 7-8	Autistic	1	MD	1	LLD	5	ICR	5	POR	5	SELF CONTAINED	0	ICS	0
Gr. 9-12	Autistic	2	MD	2	LLD	5	ICR		POR		SELF CONTAINED	4 (See Autistic & MD)	ICS	

Note: Retrieved from Special Education Class Data provided by Lakewood Public School District.

Lakewood Public School District reportedly does not have programming for Emotional Regulation Impairment, Visual Impairment, Intellectual Disabilities in its schools.

Interviews and focus groups with administrators said that they believe the District's continuum is tailored to the specific needs of its student population. One possible explanation for the relatively fewer Multiple Disabilities settings, as well as the absence of Emotional Regulation Impairment and Intellectual Disability settings, could be attributed to a significant number of students with more profound needs receiving their education in nonpublic schools or through out of District placements. This determination is typically made either by the CST team or through parental placement. It raises the question as to whether, with additional planning and specific programming development, the District could bring some students with more significant needs back from out of District placements.

In the PCG staff survey, 54.0 percent of staff agreed that there is collaboration between the CST and building leadership to implement a robust continuum of services, and 38.6 percent of staff believe the central office is responsive to their school's requests for assistance with special education related issues. Further, just 68.6 percent of families agreed that their school effectively responds to the needs and concerns of families of students with IEPs. These low percentages indicate that the District will need to further focus on collaboration across stakeholders and improve its responsiveness to both schools and families.

Specialized Out-of-District Placements
The IDEA affords children with an IEP a Free and Appropriate Education in the Least Restrictive Environment. When a Child Study Team determines that a student with an IEP is unable to make academic and functional progress in the school and program they attend, the IEP team can determine the provision of FAPE and LRE is best suited in an out-of-District placement. When a CST makes this decision, they generally must choose an appropriate school that is also an Approved Private School for Students with Disabilities (APSD). This placement must be consistent with NJAC 18A:46-14, in which the CST must consider:

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[99] Includes OT, PT, and Speech

A. A special class or classes in the District, including a class or classes in hospitals, convalescent homes, or other institutions;

B. A special class in the public schools of another District in this State or any other state in the United States;

C. Joint facilities including a class or classes in hospitals, convalescent homes or other institutions to be provided by agreement between one or more school Districts;

D. A jointure commission program;

E. A State of New Jersey operated program;

F. Instruction at school supplementary to the other programs in the school, whenever, in the judgment of the board of education with the consent of the commissioner, the handicapped pupil will be best served thereby;

G. Sending children capable of benefiting from a day school instructional program to privately operated day classes, in New Jersey or, with the approval of the commissioner to meet particular circumstances, in any other state in the United States, the services of which are nonsectarian whenever in the judgment of the board of education with the consent of the commissioner it is impractical to provide services pursuant to subsection a., b., c., d., e. or f. otherwise…[100]

Generally, the New Jersey Department of Education County Offices' Child Study Team Supervisor sign-off on this CST team decision to finalize the change in placement. The child's IEP must also be amended to reflect this placement and address other provisions within that are specific to out-of-district placements.

If the Child Study Team is unable to identify a placement that meets the requirements of sections A through G of the regulations:

> *"…that child may be placed in that academic program by the board of education, with the consent of the commissioner, or by order of a court of competent jurisdiction. An academic program which meets the requirements of the child's Individual Education Plan as determined by the child study team and which provides the child with a thorough and efficient education, shall be considered an approved placement for the purposes of chapter 46 of this Title, and the board of education shall be entitled to receive State aid for that child as provided pursuant to P.L.2007, c.260 (C.18A:7F-43 et al.), and all other pertinent statutes."[101]*

This kind of atypical placement is known locally as a Naples Placement. Such a placement is either a nonpublic school within the state or, in any other state in the United States, and determines that the identified program meets the requirements of the child's IEP. In this case, the approval of this Naples placement requires it be an accredited nonpublic school; the services of the placement are non-sectarian and the placement is approved by the board of education with consent of the Commissioner or by order of the Court. [102] As is noted elsewhere in this report, the District does not currently have any students in a Naples Placement.

During focus groups and interviews, it was consistently noted that a significant number of students placed out of District have complex needs, presenting challenges ranging from being non-verbal to requiring ventilators, having feeding tubes, or facing severe medical conditions. According to participants in the focus groups and interviews, they believe the District lacks the essential behavioral support resources needed to address these complex cases. Many believe meeting the medical needs of these students, especially those placed out of District, often exceeds the District's capacity. Some students have diagnoses that may be unfamiliar to educators, such as familial dysautonomia with approximately 13 cases reported in Lakewood.

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[100] New Jersey code NJAC 6A:14-4.6 special education. (n.d.). retrieved from
https://www.nj.gov/education/code/current/title6a/chap14.pdf
[101] Ibid.
[102] *PL 1989 chapter 152 naples placement instructions and forms.* (n.d.). State of NJ.
https://homeroom.state.nj.us/exaid/doc/Chapter152NaplesForms.pdf

Teachers in the District expressed a lack of knowledge regarding the out-of-district placement process, indicating that they are not actively involved in that decision-making process. Additionally, there is a call for exploring the possibility of creating a program similar to what neighboring out of District schools have for students with significant needs. However, participants noted that limited funding poses a major obstacle to implementing such a program, representing a substantial struggle for the District. Many participants noted the need for additional resources and financial support to address the unique needs of students with complex medical and behavioral challenges.

According to the User-Friendly Budget, during the 2019-2020 school year, Lakewood spent $48,755,738 for 402 students in out of district placements. The average per pupil tuition for that year was $121,282.93.

The tuition total amount increased to $57,499,863 in 2021-2022, though the number of students decreased to 372. The average per pupil tuition for that year was $154,569.52.[103]

FIGURE 56. OUT OF DISTRICT TUITION AMOUNTS FOR COMPARABLE DISTRICTS, 2020 TO 2022

	2020 Actual			2021 Actual			2022 Estimate		
	Enrollment	Tuition Total	Per Pupil Tuition	Enrollment	Tuition Total	Per Pupil Tuition	Enrollment	Tuition Total	Per Pupil Tuition
Lakewood	402	$ 48,755,738.00	$ 121,282.93	372	$ 57,499,863.00	$ 154,569.52	389	$ 50,766,692.00	$ 130,505.63
Jackson	55	$ 4,731,339.00	$ 86,024.35	47	$ 6,265,760.00	$ 133,314.04	54	$ 5,059,139.00	$ 93,687.76
Brick	66.5	$ 4,681,305.00	$ 70,395.56	62.5	$ 4,697,215.00	$ 75,155.44	87.5	$ 4,291,708.00	$ 49,048.09
Toms River	86	$ 7,553,746.00	$ 87,834.26	77	$ 7,726,358.00	$ 100,342.31	77	$ 1,787,180.00	$ 23,210.13
Jersey City	139	$ 20,854,439.00	$ 150,031.94	129	$ 20,530,995.00	$ 159,155.00	129	$ 19,429,493.00	$ 150,616.22

Note: Retrieved from "Comparable District User Friendly Budgets" by Official Site of the State of New Jersey (https://www.nj.gov/education/finance/fp/ufb/2022/17.html)

Access to the General Education Curriculum

IDEA requires that all children with disabilities be provided with access to the general education curriculum (GEC).[104] The GEC is defined as the curriculum used by all students enrolled in the same grade, including students with disabilities, and is based on a state's academic content standards. As described in the Curriculum and Instruction section of this report, Lakewood has developed standard pacing guides across the District; however, this structure has raised additional questions about how to meaningfully include students with disabilities.

For students with disabilities to improve their academic achievement and reduce the achievement gap with their nondisabled peers, they need to be included in the core curriculum and receive evidence-based interventions that are targeted and implemented with fidelity. As was noted earlier in this section, for the past three years, the District has not met state targets for preschool or school age students being educated in the least restrictive environment. As such, this is an area that will continue to benefit from focused attention to ensure Lakewood continues to meet the targets in the future. According to PCG's classroom visits, schools within the District appear to vary with respect to the extent to which students are educated in general education classes, and the extent to which special and general educators co-teach to educate these students. The variance ranges from a very high degree of inclusivity where almost all students are educated within general education classes to very little inclusiveness in terms of accessing the materials.

Embedded within this approach is the expectation that students with disabilities have access to grade-level content and can achieve at high levels. A relatively high percentage (82.1%) of staff on the survey agreed with the statement "Building administrators (principals, assistant principals, etc.) in my school have high expectations of students with IEPs." Similarly, 87.1% of staff survey participants believe that school staff (teachers, related service providers, paraeducators, coaches, social workers, counselors, etc.) in their schools have high expectations for students with IEPs.

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[103] *User friendly budgets*. (2022-2023). State of New Jersey Department of Education. https://www.nj.gov/education/finance/fp/ufb/2022/17.html

[104] Individuals with Disabilities Education Act, 20 U.S.C. § 1400 (2004), retrieved from https://sites.ed.gov/idea/statuteregulations/

During information gathered from focus groups, teachers shared concerns over time constraints and pressures to follow the curriculum while meeting the individual needs of students with IEPs. They overwhelmingly expressed frustrations with pacing guides and their incongruence with the demands of following students' IEPs. Teachers also shared these concerns for students who are both English Learners as well as having an IEP. A quick roll-out of the ELA curriculum, known as CommonLit 360, in addition to its prescriptiveness, was also cited as problematic. Many teachers shared concerns that they do not work in an environment where they can express these concerns without experiencing retribution, such as building transfers or non-renewal of their contracts if they are non-tenured.

Specially Designated Instruction and Individualized Supports

According to the Individuals with Disabilities Education Act, "special education" means "specially designed instruction, at no cost to parents, to meet the unique needs of a child with a disability including (a) instruction in the classroom in the home, in hospitals, and in other settings; and (b) instruction in physical education."[105]

Students can receive specially designed instruction (SDI) throughout a continuum of special education services which are provided in the Least Restrictive Environment (LRE), where, to the maximum extent appropriate, a student with a disability is educated with peers who are not disabled.[106]

SDI is "adapting, as appropriate to the needs of an eligible child under this part, the content, methodology or delivery of instruction (i) to address the unique needs of the child that result from the child's disability; and (ii) ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children"[107] (34 CFR §300.39(b)(3).

PCG learned about SDI in Lakewood by evaluating data gathered from interviews, focus groups, and surveys as well as classroom visits.

INTERVIEWS, FOCUS GROUPS, AND STAFF SURVEYS

Information gathered from interviews, focus groups, and staff surveys noted several concerns regarding access to the general education curriculum and the overall implementation of SDI in Lakewood. Many staff shared that teachers are expected to use general education materials but face challenges in modifying them. Almost all teachers shared that the curricula used by the District require strict adherence to the instructional materials that accompany it, specifically slide presentations and worksheets. Furthermore, it was shared that pacing guides also present challenges in providing SDI to students because teachers have limitations in their time. Several teachers voiced significant concerns that these create barriers to individualized learning for students. Even in situations where two teachers are in the room, such as ICR, teachers believe the pacing is too fast and the curriculum is too prescriptive to meet individual student needs.

Teachers expressed frustration with a lack of say in curriculum decisions and their impact on instruction, particularly in ELA and Math classrooms K-12 for students with disabilities. Many teachers voiced a belief that the District's instructional focus is more focused on the curricular materials than students' needs. Changes in the overall curriculum occur frequently, leading to a lack of continuity. They shared their lack of knowledge on how to modify the curriculum to meet students' needs with constant changes to the curriculum.

In Lakewood, according to focus group participants, decisions on curriculum and instruction are made by Curriculum Supervisors. In some cases, coaches create the curricular tools on their own, in other cases they procure curriculum and play a critical role in training and implementation. In addition, curriculum coaches are responsible for creating pacing guides. These guides prompt teachers on what content and

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[105] Individuals with Disabilities Education Act, 20 U.S.C. §1401(29), retrieved from https://sites.ed.gov/idea/statuteregulations/
[106] Individuals with Disabilities Education Act, 20 U.S.C. §1412(a)(5), retrieved from https://sites.ed.gov/idea/statuteregulations/
[107] Code of Federal Regulations, 34 CFR §300.39(b)(3), retrieved from https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-A/subject-group-ECFR0ec59c730ac278e/section-300.39

materials they should be working on and when. Administrators shared that teacher can request adjustments to the guide if they seek permission.

ICR teachers indicated that the District recently determined that parallel teaching, a form of co-teaching, is a primary focus. In parallel teaching, each teacher leads half of the class teaching the same content or addressing instructional objectives; it is distinct from station teaching in that the groups do not switch.[108] The District engaged a consulting company to provide professional development for the 2023-24 school year to provide training on parallel teaching. According to contents within the training provided by the District for the 2023-24 school year, parallel teaching in Lakewood is the following: "The general education teacher provides instruction to the majority of students while the ICR teacher provides a parallel lesson to a small group of students, who are unable to participate in the whole group lesson as determined by the data." The training indicates: "This model should be used daily, across all subject areas." The training also defined team teaching as the following: "When the whole group lesson effectively meets the instructional needs of all students in the class, the ICR teacher co-teaches with the General Education teacher. This approach involves both teachers delivering instruction at the same time." This training notes that team teaching "…should be used sparingly (1-5% of the time)" and that it "…should only be used if all students' data shows that they can effectively participate in the whole class lesson."[109]

Many teaching staff shared they do not understand how to parallel teach given the structure of the curriculum, materials, and pacing. Some teachers shared frustration that this may be temporary until the next change is made because of so many frequent changes to instructional practices and expectations.

Others reported that parallel teachers are expected to adhere to the pacing guide, hindering the inclusive atmosphere that characterized classrooms before this shift. The once indistinguishable roles of general education teachers and special ed teachers have given way to a clear division, with a distinct "back table group" replacing the inclusive approach. This change, according to teachers, has resulted in a lack of collaboration among co-teachers and diminished support for newer teachers. Some also expressed concerns that there is not enough, or no, common planning time and noted that the special educator in the room frequently gets pulled to either provide coverage for other special education teachers or has to leave because of meetings.

Concerns were raised by teachers who support both English Learners who also have IEPs. Specifically, teachers expressed concerns that these students have limited elective options at the high school level due to scheduling constraints.

CLASSROOM VISITS

PCG visited classrooms where students with IEPs are receiving their special education services. In total, PCG visited all subject areas across all grade-bands where students were receiving special education services (**Table 31**). PCG visited a total of 33 classrooms where instruction was provided by at least one special education teacher. These visits occurred on December 11 and 12, 2023 and January 3, 2024. Classroom visits were 20-25 minutes each. PCG made every effort to visit a representative sampling of Lakewood's continuum of special education services across the District. The PCG team met with a principal or designee at each school where they were presented with the list of classrooms to be visited. Staff checked to ensure that teachers were present. If not, substitutions were made where possible. In addition to the classrooms visited, PCG also visited related service spaces.

TABLE 31: CLASSROOMS/PROGRAMS VISITED FOR SPECIAL EDUCATION

Grades	In Class Resource (ICR)	Language/ Learning Disability (LLD)	Multiple Disabilities (MD)	Pull-out Resource (POR)	Autism (AUT)	TOTAL

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[108] Friend, M. (2019). Co-Teaching: Strategies to Improve Student Outcomes, Second Edition.
[109] The power of 2: refining the inclusive model to promote LRE. (2023). Magnolia Consulting Group.

Preschool	1				1	2
K-6	2	3	1	1	3	10
7-8[110]			1		1	2
9-12+	3	3	5	5	3	19

AREA I: FOCUS ON LEARNERS
Student Engagement

- **Disengaged Learning.** Rote fill-in-the-blank prompts dominated most classrooms, with limited checking for understanding or mastery. The emphasis appears to be on completing pages rather than grasping concepts, or students working on computers individually. In multiple instances, students did not respond to direct teacher questioning. This was most notable in high school LLD, POR, and ICR settings. In the majority of LLD, POR, or ICR classrooms visited, student engagement was limited. These patterns coincided in settings where there was heavy use of worksheets, teachers were pacing the instruction in a manner that appeared too fast, and paraprofessionals appeared underutilized and disengaged.
- **Active Engagement**. Isolated classrooms demonstrated active student engagement in discussions, note-taking, project completion, and problem-solving. This was seen in high school life skills and an ICR classroom as well as in some of the elementary school classrooms. This was also apparent in all of the early childhood classrooms visited.

Student Activity

- **Routines.** Consistent routines were noted in a small handful of self-contained classrooms, contributing to a predictable and organized learning atmosphere, which can positively impact student behavior and engagement. Routines were most notable in the high school MD, Autism, and life skills settings, as well as throughout early childhood, elementary and middle school classrooms visited.
- **Communication Challenges in Autism Classes**. PCG noted students of limited verbal ability in these classrooms. Without Augmentative and Alternative Communication (AAC) systems present in classrooms, many appeared to struggle to communicate. When asked about those options, teachers reported that no student IEPs required Augmentative Communication Systems. Additionally, while ABA and BCBA services and supports were reported, there were unclear reinforcement systems, and occasional issues with compliance; almost no parings of visual information to support verbal communication; no visual communication schedules; and no examples of alternative communication systems such as picture exchange systems, communication boards, or communication devices in instances exhibited of limited student verbal communication skills. Teachers noted they seemed unnecessary. In these settings, student communication and engagement were highly variable and often nonexistent. In addition, there was also inconsistent application of strategies to reinforce appropriate communication and engagement. The most noted strategies were simply verbal inducements. There were no data sheets or evidence of data collection relative to academics or behavior. PCG did observe examples of staff providing students edible reinforcements (gummy bears, cookies) to induce alternative behaviors in a manner that did not appear to follow any established formal reinforcement protocol.

AREA II: FOCUS ON INSTRUCTIONAL PRACTICES
Lesson Design

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[110] Scheduled to attend 6; however, fire drill and school assembly disrupted schedule.

- **Challenges Implementing Specialized Instruction.** In classrooms where students were receiving special education services, teachers followed the general education curriculum using instructional materials provided to them such as worksheets and slide presentations; however, there were limited visible individualization, adaptation, differentiation, personalization, or use of modifications. These challenges coincided with apparent challenges in pacing, whereby the teachers were moving too fast relative to the students' understanding. These challenges most notably occurred in the majority of high school POR, LLD, and ICR classrooms visited and nearly all elementary school classrooms visited.
- **Structured Lessons**. There were a few instances of structured lessons with clear objectives, warm-up activities, and guided notes were observed.
- **Instructional Technology**. Teachers consistently used technology to enhance lesson delivery such as Smart boards, laptops, and interactive slides. In every classroom visited, instructional technology was a critical component of the lesson. Teachers used this technology with ease. While most students also used the technology with ease, they often appeared not to be engaged in the activities or lessons.

Checks for Learning/Understanding

- **Lack of Checks for Understanding.** Several classrooms lacked checks for understanding, with teachers moving through material without ensuring student comprehension or mastery. There was limited reciprocal communication in the instructional environment between students and teachers. In almost all the high school LLD, POR, and ICR classrooms, there were inconsistent checks for understanding that appeared to align with teachers need to meet pacing guide requirements. In elementary and middle schools, teachers more frequently used both formal and informal checks such as thumbs up, thumbs down or verbal questioning. PCG saw very few examples of data collection happening in real-time during instructional activities. In many of these instances, there were underutilized paraprofessionals in the room who could have been collecting data and were not.

Subject Mastery

- **Subject Mastery**. Teachers in some classrooms displayed a strong command of the subject matter, using relevant vocabulary and making connections to real-life scenarios. It was observed in high school life skills and LLD classrooms but was not evident across all high school instruction. This mastery was also observed throughout most of the elementary and middle school classrooms.

Co-Teaching

- **ICR Predominately Followed One-teach, One-Observe Co-Teaching Model**. One-teach, one-observe was the predominate co-teaching model used in ICR settings. There was very little team teaching evident during visits. There was some parallel teaching observed in elementary school settings. It was notable that in about half of the ICR classrooms visited, the ICR teacher was either not present or was planning to leave due to classroom coverage issues or having to leave to attend meetings. What was observed during classroom visits was inconsistent with the District's definition of parallel teaching.
- **Lesson Objectives**. In almost all but one or two isolated classrooms PCG visited, there were lesson objectives posted. These objectives were almost universally a repeat of a specifically referenced New Jersey educational standard. While the standard was noted, in most instances, if was difficult to ascertain if posted objectives actually linked to the instruction observed. While the instruction matched the academic subject under observation, it was only in one or two classrooms that there was a directly observable connection between the objective and instruction. Since PCG did not have lesson plans for the classrooms observed, it was difficult to ascertain further correlation. While PCG may have observed instruction related to a subset of a standard, which then did meet the posted objective, it was just not readily apparent without additional data.

Levels of Student Work

- **Pacing Challenges**: Pacing issues were evident in multiple classes, with lessons moving too fast relative to student responses. In these instances, teachers often asked questions which either went unanswered by students or the teacher verbally answered the questions themselves. In almost all classrooms visited, aside from Autism, MD, and early childhood, teachers were notably moving through material quickly. It appeared to be an impediment in nearly all LLD, POR, or ICR high school classrooms. In many of the elementary school classrooms, pacing was uneven. In all of these situations, teachers were using pre-made slides or materials.

Instructional Materials

- **Workbook/Worksheet Use.** Many classrooms heavily relied on workbooks, leading to rote fill-in-the-blank activities without sufficient emphasis on higher order thinking, topic understanding or topic mastery. In nearly all high school LLD, POR, or ICR classrooms, students were working entirely from worksheets and engaged in activities where an activity was focused on worksheet completion.
- **Curriculum Materials.** Classroom materials were largely part of a curricular program such as Common Lit 360 for high school English Language Arts. Teacher-presented slides were either part of a curricular program or created internally by the District.
- **Underutilization of Paraprofessionals.** In multiple instances, paraprofessionals were observed as disengaged or not actively participating in supporting students. In several instances, paraprofessionals appeared uncertain of their roles and were in the back of the room and circulated. This was especially true in settings where the paraprofessionals were there to support classroom instruction. In half of the high school LLD, POR, or ICR classrooms, this was observed.

AREA III: FOCUS ON CLASSROOM ENVIRONMENT

Classroom Appearance

- **Neat and Organized Classrooms**. All classrooms were consistently clean, neat, and organized.

Classroom Management

- **Compliant Students in Instruction**. Students were consistently compliant in engaging in appropriate and safe school behaviors such as remaining seated at their desks, communicating politely with teachers, and not talking or arguing with each other or adults. However, in several instances, students were not following directions when asked to answer questions or complete instructional tasks. In these situations, there was limited redirection by teachers or paraprofessionals.
- **School Security**. Security officers throughout buildings, with apparently positive rapport with students and teachers.

Classroom Culture

- **Compliant Students in Safe and Appropriate School Behavior**. Students were consistently compliant in engaging in appropriate and safe school behaviors such as remaining seated at their desks, communicating politely with teachers, and not talking or arguing with each other or adults. PCG only saw two instances among the 33 classrooms visited where students were non-compliant. In both instances, teachers redirected students and the students became compliant.
- **Routines.** Consistent routines were noted in some classrooms, contributing to a predictable and organized learning atmosphere, which can positively impact student behavior and engagement.

Space and Equipment

- **Related Service Space and Equipment**. PCG visited all Speech, OT, and PT rooms in all buildings across the District. The rooms were large and well equipped with state-of-the-art

equipment such as Therapy Cages. There was equipment for students with significant fine and gross motor skill needs as well as mobility needs. However, it was noted that no students in the Districts buildings presently use wheelchairs. In addition, much of the newer equipment has not yet been used.

- **Snoezelen Multisensory Environments**. The District has Snoezelen Multisensory Rooms in its schools. These rooms are used for students who need support in a calming environment. Many of these rooms are relatively new to the District and appeared to be in use.

Related Services

During focus groups and interactions with related service providers, they also spoke to the positive collaboration between administration, staff, and parents, in the support of students on their caseloads. Many related service providers shared their concerns, however, about the amount of time students are outside of the classroom receiving services and expressed their desire to provide more push-in services.

Participants spoke favorably to the District's efforts to procure new equipment when needed. During site visits, PCG saw all occupational therapy (OT), physical therapy (PT), and speech therapy spaces in all school buildings across Lakewood Public School District. Each of these spaces were very well equipped. Many elementary speech spaces had doll houses, kitchens, and books. Some of the spaces had brand new climbing walls. Additionally, many of the OT and PT spaces contained Therapy Cages – state of the art therapy equipment often used to support people with significant needs in a medical setting. Rooms also had trikes, mobility equipment, and Riften chairs. PCG noted the amount of equipment to support students with mobility issues and the few students within the District's buildings with significant mobility issues. For example, there are no students in the District who presently use wheelchairs. The District shared that Elementary and Secondary School Emergency Relief (ESSER) grant funding was used to purchase and upgrade the newer equipment.

Therapy spaces were large with significant room for therapies to occur. Building administrators noted there have been no recent capacity issues with the delivery of related services in their respective therapy spaces.

Positive Behavior Supports

Lakewood Public School District is a participant in the New Jersey Positive Behavior Supports in Schools (NJ PBSIS) project which is a collaboration between the New Jersey Department of Education, Office of Special Education and the Boggs Center at the Rutgers Robert Wood Johnson Medical School. The initiative is funded through IDEA Part B. In the 2022-23 school year, Lakewood Middle School achieved "implementation fidelity" as determined by the program.

According to the NJ PBSIS website:

> NJ PBSIS provides comprehensive professional development to support the implementation of tiered interventions that provide equitable access to a range of school intervention needs including conduct, behavior and social and emotional wellness. Since 2003, NJ PBSIS annually enrolls a cohort of schools whose personnel participate in a three-year professional development experience to design and implement a plan for their tiered intervention system. [111]

Although Lakewood is a participant in the program, there appears to be a disconnect between the program and District staff as it relates to supporting students with IEPs. Staff at elementary schools, middle school, and high school shared there is a reliance on school counselors to support behavioral needs. Some staff indicated there are very few programs in the District to support positive behavior. During focus groups and interviews, Lakewood participation in NJ PBIS was not raised.

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[111] "NJ PBSIS" (n.d.). pbsisnj.org

When PCG visited the middle school, there was a school-wide assembly on behavior. Throughout PCG's classroom and building visits, children were polite and well behaved. School security officers and school staff in the hallways were familiar with the students.

Teachers expressed concerns that there are not enough programs in the District for children who need behavioral interventions. Many teachers believe the Board-Certified Behavior Analysts (BCBAs) in the District are supportive, it was also shared that BCBA support for classroom varies and they are not always accessible.

PCG visited both Autism classrooms as well as classrooms where it was shared that Applied Behavior Analysis protocols were occurring. PCG saw multiple instances of edible reinforcement being used (from gummy bears to cookies); however, it did not appear that data was being collected on use of the edible reinforcers or if they were part of a behavior protocol. PCG also saw instances when use of visual social stories may have been helpful but were not apparent. It was reported that the addition of LLD programming is initiated to support students with behavioral challenges in District.

Transition Activities

Starting at age 14, teachers and CST members reported they engage in the process of creating transition goals and completing the transition sections within IEPs. Staff reported that transition is a "team approach" and that students are involved in the process.

PCG visited MD and Autism programs where the focus is on functional reading, life skills, and pre-vocational training. Students in these programs have classes in rooms that include ovens/kitchens, a bed, and tables. Staff indicated the District collaborates with government agencies such as the Division of Vocational Rehabilitative Services to support the transition of students in its post-graduate program (ages 18-21) into adult life after their time at Lakewood High School.

Lakewood has four community-based instruction sites. The District also has a coffee cart program and a program called "Piner Diner" where students shop in the community for food and engage in a food service program in the high school.

IEP Development

According to the New Jersey guidance on IEP Development:

> The cornerstone of the IDEA is the entitlement of each eligible child with a disability to a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet the child's unique needs and that prepare the child for further education, employment, and independent living. 20 U.S.C. §1400(d)(1)(A). Under the IDEA, the primary vehicle for providing FAPE is through an appropriately developed IEP that is based on the individual needs of the child.[112]

> An IEP must take into account a child's present levels of academic achievement and functional performance, and the impact of that child's disability on his or her involvement and progress in the general education curriculum. IEP goals must be aligned with grade-level content standards for all children with disabilities. The child's IEP must be developed, reviewed, and revised in accordance with the requirements outlined in the IDEA in 34 CFR §300.320 through §300.324.[113]

While requirements in IDEA delineate when and how an IEP is developed, it is essential for all members of the team to work in a collaborative manner on behalf of each student. Parents have valuable information to

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[112] Individuals with Disabilities Education Act, 20 U.S.C. §1400(d)(1)(A), retrieved from https://sites.ed.gov/idea/statuteregulations/
[113] Code of Federal Regulations, 34 CFR §320-324, retrieved from https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-A/subject-group-ECFR0ec59c730ac278e/section-300.39

share about their child. As a team, families and practitioners need to develop a partnership in which each team member feels trusted, valued, understood, and respected.[114]

To support the perception of collaboration between parents and educators, 75.0 percent of staff surveyed agreed that the IEP process involves collaboration between general educators, special educators, and parents. Of parents surveyed, 79.3% believe they are given a meaningful opportunity to participate in IEP meetings.

Using the Golden Thread framework and Quality Indicator Review protocol, PCG randomly selected and reviewed approximately 25 student IEP files to assess the overall quality of the content of IEPs developed by Lakewood Public School District. Files reviewed were a representative sample of preschool, general education, and specialized programming IEPs throughout the District. More information about the Golden Thread Framework and the indicators used for the evaluation can be found in the Appendix.

A narrative summary is included below as evidence for each indicator.

Quality Indicator Review Findings
PRESENT LEVELS OF ACADEMIC AND FUNCTIONAL PERFORMANCE (PLAAFPS)

Strengths
• A variety of in-depth data was provided to paint a clear picture of the students' current areas of strength and areas of need. • There were bilingual evaluations for students that required them.

Opportunities
• Only two student records included rating scales which should be part of a comprehensive evaluation for some of the students based on their disabilities. Only the teacher scale that was included and not the parent. There was no note as to whether the parent input was sought. • Some files reviewed only included the score report that is generated for specific assessments, not a report that provided student background or interpretation of scores and how this impacted the student academically. • Only a few of the IEPs reviewed included parent input. Most did not have a section included for it.

MEASURABLE ANNUAL GOALS

Strengths
• The majority of goals were written in SMART goal format. • The goals and objectives were aligned to grade-level/meaningful standards for students.

Opportunities
• There appear to be many formatted goals that are plugged into IEPs. There were several grammatical errors, missing student names, and redundancies of statements throughout the IEPs reviewed. • There are inconsistencies with IEP development especially related to measurable objectives relating to the goal. • In some cases, goals only focused on academics and there were no goals to address the student's challenges with organization and attention.

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[114] *Supporting parent participation in the individual family service plan or individualized education program process.* (2018). PACER Center. https://www.pacer.org/parent/php/PHP-c259.pdf

- Goals and objectives did not seem to fully align with students' needs, in some cases. While they were aligned to standards, they lacked specificity to the students' needs for reading and written expression.
- Goals were generally aligned with PLAAFP areas; however, with some goals, it would be hard to measure progress or understand how the student was going to improve in these areas based on how the goals were written.

SERVICES AND PLACEMENT

Strengths
• The statements for the justification of removal from general education were detailed and provided a rationale for students being removed from the general education setting. • The support for school personnel section was clearly outlined in every IEP reviewed, so it was clear how the team was working together to support the student and what support was needed. • Some IEPs have pages of accommodations and modifications, the volume of which are very hard to implement and could be eliminated given good teaching practices or strong Universal Design for Learning (UDL) implementation.

Opportunities
• Assistive Technology was not a widely used consideration for students in the IEPs reviewed despite many of the students having more moderate disabilities. There were accommodations in some IEPs, mostly low-tech options, but this was not checked under Special Considerations.

PROGRESS REPORTS

Strengths
• Progress reports were completed for students whose files were reviewed.

Opportunities
• Progress reports were inconsistent, in that some were blank, some had only ratings for student progress, and others included ratings with supporting data as to how the teacher arrived at the rating. • Progress reporting does not appear to have District-wide requirements to include both qualitative and quantitative data sources.

Overall, IEP paperwork generally does not align with grade level requirements stipulated for an IEP. For example, a preschool IEP includes state testing and transition paperwork required for older students.

BUILDING CAPACITY AND MATERIALS

PCG visited all school buildings at Lakewood Public Schools. Overall, PCG had the following impressions:

1. **Physical Plant Space**: Appropriate and appear sufficient for all service delivery needs, including storage.
2. **Accessibility**: Accessible options in each school, including ramps, stair lifts, elevators, restrooms, and hallways.

3. **Resources**: Extensive and well-resourced schools in terms of materials, including cutting-edge OT and PT therapy gyms, therapy cages, climbing walls, sensory rooms, mobility devices, treadmills, rowing machines, ellipticals, trikes, bikes, therapy tables, slides, climbing/tumbling equipment, and technology for speech services.
4. **Facility Maintenance**: Facilities are well-maintained, clean, with inviting decor, color-coded wings aiding in security.
5. **Security**: School security is highly diligent, accounting closely for all who enter and exit buildings.
6. **Related Service Delivery Spaces**: Spaces for related service delivery are located close to areas of student need, ensuring minimal classroom to service transition time. Related service staff have sufficient space to store materials, provide therapy, and office space. Almost all spaces are equipped with state-of-the-art equipment, including climbing walls, Snoozelen Rooms, and new PT Cages, typically found in medical settings.
7. **Instructional Technology**: Every classroom in every building visited had modern instructional technology that was in use. This included interactive white boards, student laptops, and teacher laptops. Students and staff throughout the buildings and in all grade levels used technology in both teaching and learning.

During interviews and focus groups, information was shared about the facilities. The first is that the facilities house only a fraction of the school children who reside in Lakewood and receive their education in private schools. Some staff spoke of a belief that the programs within buildings are over capacity. However, administrators and staff within the District, especially those who have been in the District for many years, acknowledged that capacity issues are much less a problem now than years ago. The most notable concern about facilities shared by teachers and administrators is the facilities for the LECC, which is spread across three campuses in modular trailer classrooms. Staff shared concerns about noise within the trailers and moving between the trailers. Others had concerns about making capital improvements on facilities that have a notably shorter useful lifespan than permanent structures.

Building Visits
At the **Early Childhood Campuses (LECC)**, with integrated and separate special education preschool, there are three campuses with a trailer system, and most of the staff work in cubicles. There is not much technology in classrooms, but teachers have computers. Campuses 1 and 3 are connected with integrated trailers and have a new accessible playground. The OT/PT space has a new therapy gym, Snoozelen sensory room, trampoline, climbing wall, adapted mobility equipment, Rifton chairs, trampolines, trikes, and various storage options. The Speech space has engaging materials like a play kitchen, dollhouse, puzzles, and games. Campus 2 has a playground and multiple trailers with similar resources. As this is a single-story building, there is no elevator. The classrooms visited were clean, well appointed, bright, and were at or under capacity. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. Facilities information such as date of construction and capacity were not available.

The **Piner Elementary School,** grades preschool and kindergarten, is a single-story building. The classrooms visited were clean, well appointed, bright, and were at or under capacity. The OT/PT related service space is well-equipped with standing swings, mats, ramps, slides, trikes, tumble rollers, bean bag seating, and more. Speech has two rooms for individual and group sessions with Rifton Chairs and lots of therapeutic materials stored in cabinets. As this is a single-story building, there is no elevator. Piner has ADA bathrooms. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. District administration noted they are renting this space from a local church. The facility once housed a parochial school. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. Facilities information such as date of construction and capacity were not available.

The **Spruce Street School,** grade 1, is a one-story building with accessible restrooms. The OT/PT space is well-supplied with tables, Rifton chairs, standing swings, treadmill, slides, climbing equipment, sensory room, and they follow the District policy for adult presence. Speech has two therapy rooms with a dollhouse, classroom library, and therapy tables with adapted seating. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1960 and has a capacity for 799 students. The building is 49,724 square feet.

At the **Clifton Avenue School**, grades 2-6, there are ADA bathrooms, an elevator, and a new stair lift. The classrooms visited were clean, well appointed, bright, and were at or under capacity. There are two related service rooms—one for speech and one for OT/PT. The OT/PT space is smaller than a regular elementary classroom but filled with useful things like standing swings, mats, balls, climbing equipment, adapted seating, Rifton Chairs, kidney tables, fine motor materials, and a new Smartboard. The Speech room is also smaller but has lots of technology, therapy materials, play equipment, and storage. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. There are presently no students at this school who use a wheelchair for mobility access. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1923 and has a capacity for 782 students. The building is 79,039 square feet.

At the **Oak Street School**, for grades 2-6, the OT/PT related service space is large with a state-of-the-art therapy cage, new climbing wall, standing swing, treadmill, elliptical, mats, bean bag chairs, sensory ball pit, trampoline, and various play-based therapy options. Speech is in a shared space for two therapy groups with extensive materials stored in cabinets and a counseling-designed play therapy space. The Oak Street School is a multi-level building and has an elevator. There are presently no students at this school who use a wheelchair for mobility access. The classrooms visited were clean, well appointed, bright, and were at or under capacity. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1983 and has a capacity for 799 students. The building is 70,659 square feet.

At **Ella G. Clark Elementary School**, for grades 3-6, they have three related service rooms—two for speech and one for OT/PT. The OT/PT space is large and feels like an auxiliary gym. It has a climbing wall, new flooring, standing swings, therapy cage, trikes, mats, balls, bean bag toss, climbing equipment, slides, therapy tables, treadmill, and balance beams. Three therapists work on speech, and they have dedicated spaces with lots of resources. Clark has ADA bathrooms. The classrooms visited were clean, well appointed, bright, and were at or under capacity. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1946 and has a capacity for 432 students. The building is 61,370 square feet.

At the **Lakewood Middle School**, grades 7-8, the building is multi-level and has an elevator for student access. The OT/PT related service space is in the process of getting a new, state-of-the-art therapy cage and has standing swings, bean bag chairs, climbing options, ramps, balance beam, Rifton chairs, benches,

tables, and more. Speech spaces are located in a bubble space in the middle of pods, in immediate proximity to student classrooms, and there's a separate speech room with similar materials and furniture. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. The classrooms visited were clean, well appointed, bright, and were at or under capacity. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1957 and has a capacity for 537 students. The building is 102,080 square feet.

At **Lakewood High School**, grades 9-12 and Post Graduate Special Education, the building is multi-level and has two elevators for student access. The OT/PT related service space is large with a sensory room, bikes, trikes, rowing machine, treadmill, trampoline, tables with adapted seating, and more. Speech has a dedicated space focusing on language and comprehension with well-resourced materials stored in cabinets. There's also a Life Skills area with a functional academic focus, including tables with adapted seating, break space, and appliances. There are presently no students at this school who use a wheelchair for mobility access. School administration noted that there are no known capacity issues in any of the building's special education classrooms and/or related service spaces. The classrooms visited were clean, well appointed, bright, and were at or under capacity. All spaces throughout the building were notably clean. School Security was present and processed all adults entering and exiting the building. According to the Lakewood Township School District Annual Comprehensive Financial Report for the Fiscal Year Ended in June 30, 2021, this building was constructed in 1971 and has a capacity for 714 students. The building is 276,916 square feet.

STAFFING, LEADERSHIP, AND COLLABORATION

Staffing Ratios

During classroom and site visits, PCG noted that classrooms providing special education services were well staffed with class sizes relatively small and consistent with requirements in code. In ICR elementary settings, the District keeps ICR pairs together throughout the entire day. While this is a best practice, it is rarely seen in other Districts across the United States given its high cost and struggle to find enough special educators. Staff's perceptions of these staffing resources are contrary to this point however, in that, on the staff survey, only 47.1% of participants agreed with the statement that staffing allocations are sufficient to meet the needs of students with IEPs at their schools.

In middle and high school, there are many ICR offerings. PCG noted during visits that some ICR teachers were missing and or were in transition. Staff noted that ICR teachers frequently get pulled from the classroom for IEP meetings or coverage needs.

In the 2021-22 school year, Lakewood Public School District had a 14:1 special education teacher to student with disability ratio. Among the list of comparison Districts, it is the third lowest ratio. For Child Study Team to student with disability ratio, Lakewood is the second lowest among the cohort at 22:1.

TABLE 32: SPECIAL EDUCATION STAFFING RATIOS BY COMPARABLE DISTRICTS, 2021-22 (AGES 3-21)

School District	Special Education Teachers	Students with Disabilities	SWD Student to Special Education Teacher Ratio	Child Study Team to Student with Disability Ratio
Brick	190	1,714	9:1	28:1
Jackson	162	1,373	8:1	30:1

Jersey City	95	3,605	38:1	19:1
Lakewood	**124**	**1,767**	**14:1**	**22:1**
Toms River	217	2,780	13:1	46:1

Note. Retrieved from "2021-22- New Jersey and District Profile Page (Ages 3-21)" provided by Lakewood Public School District.

Recruitment and Retention

Information gathered from interviews and focus groups raised the following themes on recruitment and retention. First, the promotion and training of paras are sources of pride, emphasizing their importance in the educational system. However, finding and retaining suitable staff is a significant area for improvement. Identifying critical staffing needs, particularly for LDTC and bilingual school psychologists, is crucial due to a limited pool of qualified candidates.

Some feel the inconsistency in staff and high turnover rates, especially among counselors, pose challenges. While some teachers leave due to relocation, turnover in middle and high schools remains a concern. There is a desire for more training, especially among new hires.

Staff shared concerns about changes in leadership within buildings, and how this creates instability that could potentially impact retention. In addition, they noted a re-shuffling of teachers between buildings, annually, and its impact on stability and a desire to stay in the District. Despite turnover, efforts made by building leadership around climate and culture have made a difference.

In addition, some staff shared they believe the District may be considering a reduction in paraeducators, raising concerns. Some staff also believe there are disparities in paraeducator salaries also need attention, with some new hires earning more than experienced counterparts.

Leadership

In Lakewood Public School District, the Department of Special Services is managed by three lateral positions (1) Supervisor of Special Education; (2) Supervisor of Child Study Team; and (3) Supervisor of Related Services. All three roles report directly to the Superintendent of Schools. All special education teachers report to their respective building principals; however, their performance reviews are conducted by the building principal and the Supervisor of Special Education. All CST members are supervised by the Supervisor of Child Study Team, and all related service providers and contractors report to the Supervisor of Related Services. The department also recently added special education coaches to support special educators, especially with parallel teaching. There are two case managers assigned to students placed in out of District settings. An additional 24 case managers have both in-district and out of District students on their caseloads.

As noted by teachers and administrators during interviews and focus groups, the school leadership landscape within the District has undergone a significant transformation over the past five years. This includes both building leadership roles as well as central office roles. Teaching staff and some administration noted this has been marked by the prominent role of consultants in shaping special education initiatives. Several teachers noted that plans to overhaul the school schedules are in motion, creating confusion and uncertainty among teachers and students due to the rapid and District-wide nature of the shift.

Teachers noted that in situations around supporting the needs of students with IEPs, conflicts arise regarding which supervisor and or building leadership to follow.

Teachers noted the District's frequent changes and new rules, communicated primarily through emails with minimal instruction, contribute to confusion and inconsistency.

Written Procedures and Policy

During the course of this review, the District produced a wide variety of documents, including detailed staff handbooks, code of conduct information, student handbooks, among other information. While these resources exist, it was evident that in many cases school staff either do not know about them or do not understand how to apply these resources in their context.

It may also be that staff would needing more explicit guidance specific to special education as evidenced by the staff survey results, in which 52.9% of participants agreed that there is written guidance established that defines expectations for special education service delivery.

MEDIATION AND DUE PROCESS

Under IDEA, states are required to operate a special education dispute resolution system that provides procedural protections for students with disabilities. New Jersey's system is a collaborative effort between the New Jersey Department of Education (NJDOE) and the Office of Administrative Law (OAL). When there is a dispute between a parent and a school District regarding the identification, evaluation, program and/or placement of a student with a disability, the parent or school District may request mediation or a due process hearing through the NJDOE's Office of Special Education Policy and Dispute Resolution (SPDR). The scheduling of mediation conferences, which are conducted by special education mediators employed by the OAL, is the responsibility of SPDR staff. Due process hearings are conducted by Administrative Law Judges (ALJs) to determine whether a school District provided a free and appropriate public education to a student with disability, as required by law.

In accordance with Public Law 2017, Chapter 103, which was enacted in July 2017, the NJDOE is required to make available on its website a full-text copy of each written decision rendered by an Administrative Law Judge (ALJ) in a special education due process hearing. In New Jersey, a decision in a special education due process hearing is a final agency decision subject to the law requiring each decision to be made public.[115]

Data regarding decisions rendered by an ALJ are available by year on the NJDOE website. The following information was listed by year for Lakewood.

- 2018 – 3 cases
- 2019 – 0 cases
- 2020 – 0 cases
- 2021 – 0 cases
- 2022 – 0 cases
- 2023 – 0 cases

Data provided to PCG from both the District and the NJDOE indicate a higher level of cases brought forward through the dispute resolution process by Lakewood families. While the data are difficult to interpret given the format provided and limited details, it is evident that there is a common approach to entering into settlement agreements before an ALJ issues a ruling.

There are currently 49 cases that the District is managing, 48 of which involve students currently in out of District placements, either in or out of state. One case involves a student at LECC. Of these, five students have active cases awaiting a decision following scheduled resolution hearings. For active agreements, the District is estimating these agreements, primarily for nonpublic school placements, to be $2.8M for the 2023-24 year. Several cases are multi-year, with totals over $133,000 for each student's tuition costs over multiple years.[116]

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[115] *New Jersey special education due process hearing decisions.* (n.d.). State of New Jersey Department of Education. https://www.nj.gov/education/legal/specialed/.
[116] "Due Process Spreadsheet" (n.d.). Lakewood Public School District.

It should be noted that the District is not capturing these students on any of its enrollment counts. Often a stipulation of the agreement is that the District will disenroll these students from its rolls. According to the District, case managers keep these students on their lists in order to informally keep track of documentation.

There are several risks with managing students in nonpublic schools pursuant to settlement agreements in this manner. First, there does not appear to be a clear mechanism to track the end dates of settlements or processes to track that triennial reevaluations and annual IEPs are compliant. Several students have IEP dates that exceed a one-year timeline, including some from 2020 and 2021. Some focus group participants shared that it is a common practice for the IEP to enter a "holding pattern" when students' services are provided through a settlement agreement. It is also unclear if the District is conducting residency checks for these students.

FAMILY ENGAGEMENT

This section summarizes findings from Lakewood Public School District specific to perceptions of parent and community engagement.

Parents are a child's first teacher and are important partners as their children progress through school. Their vital role is acknowledged in IDEA, which requires parental input in writing IEP goals, the provision of related services, and placement. IDEA also requires collaboration with parents and students with disabilities, as appropriate, to design special education along with related and other supplementary services. As part of this review, the parent's role and satisfaction with special education processes and instructional/service delivery within Lakewood Public School District were evaluated. The review sought to examine three topics related to parent and family engagement:

- **Accessible Communication and Resources:** The extent to which parents are provided with useful information and communication throughout the process and in their preferred language, have the ability to find consistent and reliable information about each process, and the extent to which the resources (literature, documentation, etc.) support the special education process;

- **Collaboration and Advocacy:** The extent to which stakeholders feel that their input is solicited, heard, and included; resources used to facilitate communication with parents of students with disabilities; and how parents are approached to collaborate with school staff in a trusting manner; and

- **Student Support:** The extent to which parents believe the evaluation process and IEPs support their children, and that appropriate placements, instruction, services, interventions and accommodations and progress reports are provided.

Accessible Communication and Resources

Information in Preferred Language

A parent or legal guardian of a student who receives special education services has the right to meaningfully participate in the development and review of their child's special education program. This can be very challenging if parent or legal guardian does not speak or understand English and the school District does not provide interpreters or translate documents into their native language. Under the IDEA, parents are entitled to an interpreter during IEP meetings and to receive a copy of the written notice, parental rights, and their child's written IEP in their native language (unless it is not feasible to do so).[117]

Overall, there seems to be a strong cultural commitment within Lakewood Public School District to provide access to information for parents, especially with regards to special education, in their native language. Focus group participants described a variety of ways in which translation occurs. It primarily comes in the form of translators during meetings to bridge language barriers, though other technologies such as

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[117] Code of Federal Regulations, 34 CFR §300.503(c), retrieved from https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-A/subject-group-ECFR0ec59c730ac278e/section-300.39

Boostlingo or other computer-based translation systems are also employed. On the family survey, some participants praised the District for making sure that everything is translated and for having Spanish-speaking staff to support in everyday requests.

Despite these efforts, focus group participants also shared challenges around enhancing accessibility for non-native English-speaking parents. They said that there is a need for more translators, in addition to translators for languages other than Spanish. As a stop gap, when translators may not be available, students are translating for their parents during parent conferences or school visits. Students may also be used to communicate information to their parents in the event the parent does not have an email address. Finally, some staff are unclear about how to initiate a request for translation or access to an interpreter.

On the family survey, participants were asked a series of questions about access to interpreters. Of those who responded to the survey, 57% said they require language translation services to better understand their child's educational needs. The majority of these parents (91.7%) indicated that they were asked if they would like an interpreter at their child's IEP meeting and that one was provided.

Advocacy and Collaboration

Special Education Parent Advisory Group (SEPAG)
In the State of New Jersey, each school District is required to have a Special Education Parent Advisory Group (SEPAG). The SEPAG is a District-level, parent-driven group charged with providing input critical issues related to students with disabilities and system-level challenges in special education and related services. New Jersey Administrative Code states: *Each board of education shall ensure that a special education parent advisory group is in place in the District to provide input to the District on issues concerning students with disabilities. 6A:14-1.2(h).* SEPAGS should ensure that all families are represented and reflect the diversity of the District.[118]

Lakewood Public School District has an active SEPAG of approximately 20 members that meets monthly. Advertisements for the meetings are in English and Spanish. All meetings are conducted virtually, though at times a hybrid in-person meeting is also offered. The District keeps active attendance records of these meetings. Below is a summary of meetings for the 2022-23 school year.

TABLE 33: SEPAG MEETING TOPICS FOR 2022-23

Topic	2022-23 School Year
September	General Meeting
October	General Meeting
November	*Guest Speaker*: Viviana Attanasio, Behavior Analyst, LPS *Topic*: Collaborating and Discussing How to Turn Ideas into Action
December	*Guest Speaker*: Ana Maria Sanchez, Ocean County Library *Topic*: Strategies for Strength and Growth of the Group
January	*Guest Speaker*: Stephen Bukowinski, Intervention and Referral Services, 504 Coordinator, LPS

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[118] *Special education parent advisory groups in New Jersey: A guide to developing and conducting an effective group.* (2019, April 16). SPAN Parent Advocacy Network. https://www.nj.gov/education/specialed/parents/docs/SEPAG%20Guide-English-updated%204%2016%2019.pdf

	Topic: Brainstorming and Creative Solutions to Benefit Children, Parents, Schools, and the Community
February	*Guest Speaker*: Elsa Mena, Bilingual Instructional Coach and Kindergarten Teacher *Topic*: Effective Strategies for Building and Sustaining Collaboration and Partnerships
March	*Guest Speakers*: Carla Marmelstein, Licensed Clinical Social Worker, Lakewood School Based Director, LPS; Adelaida Salmeron, Psychotherapy, LPC *Topic*: Strategies for Strength and Growth
April	*Guest Speaker*: Sally Castellano, Licensed Clinical Social Worker, LPS *Topic*: Vision and Mission of our SEPAG

Note. Retrieved from "SEPAG Guide-English-updated" provided by Special Education Parent Advisory Groups in New Jersey (SEPAG Guide-English-updated 4 16 19.pdf (nj.gov)

Of parents with students that have IEPs surveyed, 71.4% reported being familiar with the support offered through the SEPAG. A far lower percentage, 33.3%, indicated that they have participated in District-led training or workshops for families of students with disabilities.

Early Childhood

Focus group participants noted that a large degree of parent involvement and collaboration occurs at the LECC, as the school reportedly makes significant efforts to understand their students and meet the needs of each family. Parents are routinely invited into the building and receive regular communication about their child. Teachers also post on their Google classroom pages what students are doing throughout the day, along with pictures, so that parents have insight into their children's daily activities. Teachers also reportedly feel empowered to connect with parents to better understand the children's home environment. There is a general perception in the community that families love the early childhood center for the warmth of its staff and how they understand the children they are serving.

The LECC runs monthly parent meetings that include trainings on early childhood development, building community connections, and the necessities for child development. Topics are selected through a family survey. During the 2022-23 school year, topics included:

- Creative Curriculum
- Staying Healthy
- Social-Emotional Connections
- Building Language at Home
- How Young Children Learn
- Routines at Home
- Working through Challenging Behavior
- Stress Management
- Transition to Kindergarten

Student Services

Parent Input and Communication

Of family survey responses, 85.7% of participants said their input is considered during IEP meetings and 90.5% feel comfortable asking questions at IEP meetings. Several focus group participants shared though,

that parents may be asked to sign special education related documents without knowing what they mean and that is it incumbent on the CST, not just during the IEP meeting but on an ongoing basis, to help families understand their rights in the special education process or what options are available for their children.

Lakewood has a structured progress for sharing the schedule for related services, quarterly progress reports, parent/teacher conferences with parents each year. One parent, however, shared that they did not receive a follow up to explain the results of an evaluation nor verification of transportation or speech services, sharing "the smallest details" matter. Another family shared that while progress reports are shared, they did not understand how the school came to that assessment for each goal and if there are things that they can do at home to assist their child. The majority (90.5%) of parents surveyed reported that their child's IEP tells how progress toward goals will be measured and 81.0% reported receiving reports on their child's progress toward meeting their IEP goals, yet there remains an opportunity for Lakewood Public School District to provide more detailed information to parents about data collection and how progress on IEP goals is determined.

High Expectations and Inclusivity

The majority of parents (90.5%) surveyed reported that school staff have high expectations of their child with an IEP. A slightly lower percentage (81.0%) indicated that building administrators share this sentiment. Overall, participants on the survey indicated that their child with a disability is a valued member of their school community, both in the classroom and outside of school (e.g., extracurricular activities).

NONPUBLIC SCHOOLS

As has been noted throughout this report, the composition of Lakewood, with 170+ nonpublic schools in its boundaries, has far reaching impacts, none more so than for special education.[119] Of students parentally-placed in nonpublic schools, nearly 9,700 of them are students identified with a disability.[120] The number of students eligible for special education as consistently increased, according to data Lakewood Public School District provided on its IDEA funding application, from 7,683 on the FY 21 application to 9,698 in FY 24.

While there are slight variations in the numbers of nonpublic students Lakewood Public School District reports as eligible for special education services depending on where it is reported and at what point in time, there is greater variability between those reported as receiving services. The following series of charts display the counts of eligible students and those receiving services, as reported by the District through NJ Smart, in nonpublic schools. Those reported here are likely receiving services through Chapters 192 and 193 funding. It is unclear how many eligible students are receiving services through these funding streams as well as through IDEA.

Demographics

School Age

The number of nonpublic students, ages 5-21, eligible to receive special education services increased by 1,606 students, from 8,171 in 2019-20 to 9,777 in 2021-22. This growth represents a 20% increase in eligible students.

TABLE 34: TOTAL NUMBER OF ELIGIBLE NONPUBLIC SCHOOL STUDENTS (AGES 5-21), 2019-20 TO 2021-22

Year	Student Count
2019-20	8,171
2020-21	9,143
2021-22	9,777

Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

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[119] List of 2022-23 Nonpublic Schools. (n.d.). Lakewood Public School District.
[120] As of the October 2022 child count, 9,686 students were identified as eligible for special education services.

Of the 8,171 eligible students in 2019-20, 2,256 students (27.6%) received services. In 2021-22, 7,087 of the 9,777 eligible students (72.5%) received services. While the reporting of these data in NJSmart do not indicate how eligible students are receiving services, it is likely that they are services provided through a combination of Chapter 192, Chapter 193, and IDEA funds. It is unclear why there are significant increases in the number of eligible students annually.

FIGURE 57: NUMBER OF NONPUBLIC PLACEMENTS (AGES 5-21), 2020-22
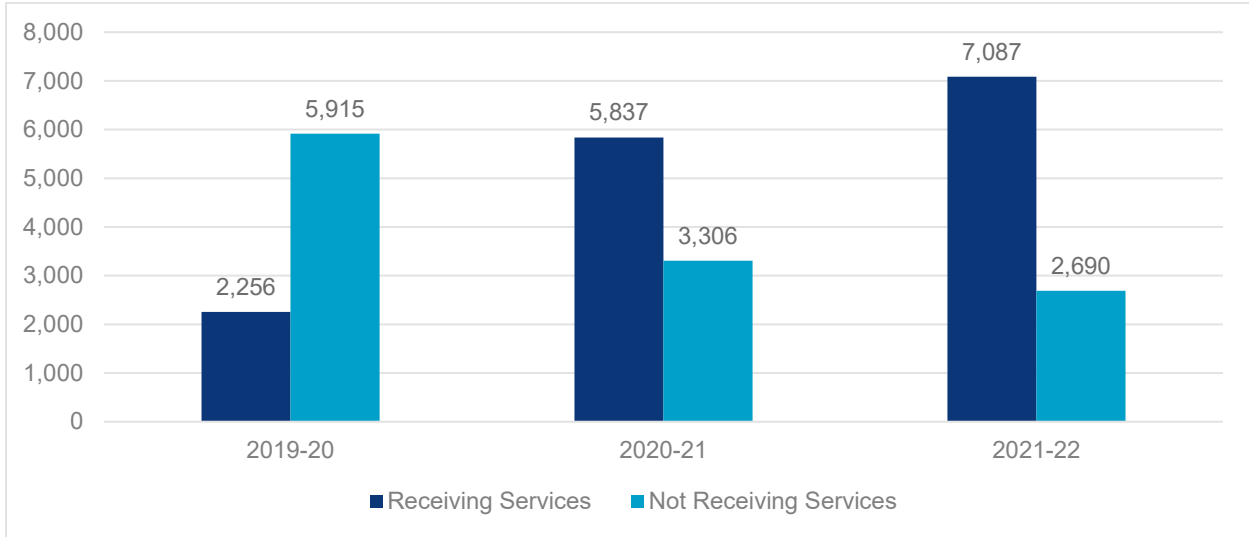
Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Of eligible students ages 5-21 in nonpublic schools, 98.2% are White and 0.2% Hispanic (**Figure 58**).

FIGURE 58: PERCENT OF NONPUBLIC PLACEMENTS WITH IEPS (AGES 5-21) BY RACE/ETHNICITY, 2022
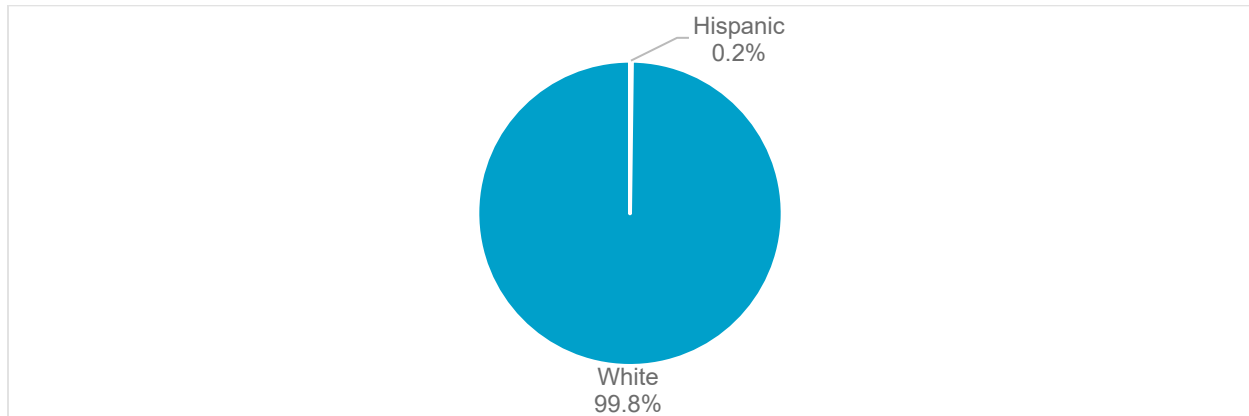
Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Preschool

The number of nonpublic students, ages 3-4, eligible to receive special education services increased by 50 students, from 86 in 2019-20 to 136 in 2021-22. This growth represents a 58% increase in eligible students.

TABLE 35: TOTAL NUMBER OF ELIGIBLE NONPUBLIC SCHOOL STUDENTS (AGES 3-4), 2019-20 TO 2021-22

Year	Student Count

2019-20	86
2020-21	95
2021-22	136

Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

Of the 86 eligible students in 2019-20, 61 students (70.9%) received services. In 2021-22, 86 of the 136 eligible students (63.2%) received services.

FIGURE 59: NUMBER OF NONPUBLIC PLACEMENTS (AGES 3-4), 2020-2022
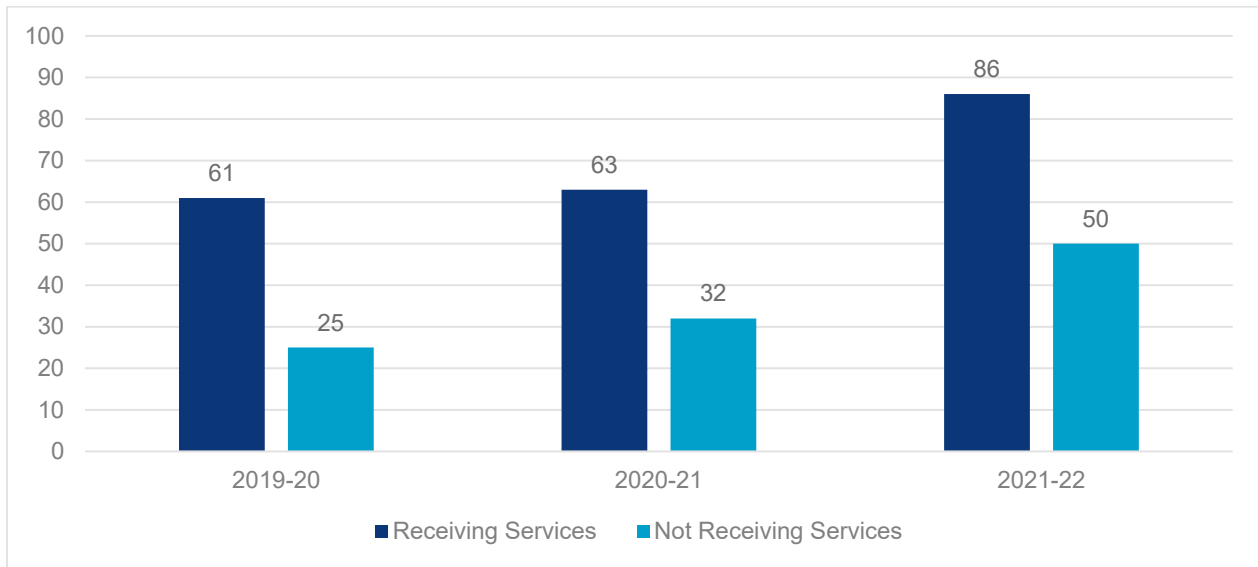
Note: Data retrieved from "NJ SMART Data Extract - Oct 15 Snapshot', Nov 2023", provided by Lakewood Public School District

100% of students ages 3-4 in nonpublic placements are classified as White.

Chapters 192 and 193

There are two mechanisms, one through local legislation and funding – Chapter 192 and 193, and one federal – IDEA - by which students determined eligible for special education services can receive supplemental support while enrolled in a nonpublic school.

New Jersey's Chapter 192 programs and Chapter 193 programs are provided to eligible students enrolled full-time in nonpublic elementary and secondary schools in New Jersey. During the school year, the parent or guardian of a nonpublic school student must request Chapter 192 and Chapter 193 services by completing a signed student application (407-1 form) and submitting it according to the instructions from the District. Submission of the student application does not make the student eligible for the Chapter 192 or Chapter 193 services. The public school District responsible for Chapter 192 and 193 services must approve eligibility according to the specific eligibility requirements for each allowable

Chapter 192 programs provide nonpublic school students with auxiliary services such as compensatory education, English language learning and home instruction. As described in state guidance:

> **Auxiliary Services**, commonly referred to as Chapter 192 programs, provide nonpublic school students with services designed to assist pupils who have academic needs that prevent them from succeeding in regular school programs, including compensatory education (supplemental to the regular programs) for the improvement of math and language arts literacy skills, English as a second language and home instruction.

Chapter 193 programs provide nonpublic school students with remedial services such as evaluation and determination of eligibility for special education and with limited related services that include supplementary instruction and speech-language services. These State-funded programs must be supplemental to federal IDEA programs.[121] As described in state guidance:

> **Remedial services**, commonly referred to as Chapter 193 programs, provide nonpublic school students with evaluation and classification for determination of eligibility for special education services, and with limited services that are supplemental to federal IDEA programs.[122]

Pursuant to administrative code at N.J.A.C. 6A:14-6.2(c), the following remedial/Chapter 193 services are available:

- Evaluation and classification to determine eligibility for special education.
- Supplementary instruction in math and language arts.
- Speech-Language evaluation and services, including determination of eligibility for speech services (for students referred for speech evaluation only) and the provision of speech services.

Funding for evaluation (initial evaluation, reevaluation, annual evaluation, and speech-only evaluation) to determine eligibility for special education services is provided only through Chapter 193 and not through IDEA, while all other special education services for nonpublic school students must be provided through IDEA funds before 193 funds are expended.[123] The public school District and service provider are permitted to provide the Chapter 192 and Chapter 193 instructional services in a sectarian nonpublic school.

District Practices and Expenditures

The District contracts with external agencies for Chapter 192 and Chapter 193 services, as evidenced by the release of two competitive Request for Proposals (RFPs) in the July 2022.[124]

According to the background provided in the RFP for Chapter 193 services, during the 2020-21 school year, approximately 1,862 pupils were funded to receive an initial evaluation or a reevaluation and approximately 2,603 pupils were funded to receive an annual review. These data align to the summary chart provided below by NJDOE of Chapter 192 and 193 allocations and categories of expenditures.

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[121] Auxiliary and Remedial Services for Nonpublic Schools (Chapters 192 and 193) (nj.gov)
[122] *Guidelines for auxiliary and remedial services (chapters 192 and 193) for nonpublic school students.* (2014, February). New Jersey Department of Education. from https://www.nj.gov/education/nonpublic/forms/192193man.pdf
[123] Ibid.
[124] Lakewood Public Schools Request for Proposals.
https://www.lakewoodpiners.org/cms/lib/NJ01001845/Centricity/Domain/4/CC%2006-2223%20final-%20rebid%20of%20CC%2005.pdf; https://www.lakewoodpiners.org/cms/lib/NJ01001845/Centricity/Domain/4/CC%2004-2223%20FINAL.pdf

TABLE 36: CHAPTERS 192 AND 193 AWARDS, LAKEWOOD FY21-24

Fiscal Year	Program Category	Awards					Refunded to the State
		Services	Initial Allocation	Additional Services	Additional Funds	Total Funds (Initial and Add)	
2020-21	COMPENSATORY EDUCATION	24,253	$21,122,180.00	3,598	$1,253,414.00	$ 22,375,594.00	$ 2,621,907.00
	E.S.L.	876	$ 778,002.00	710	$ 244,946.00	$ 1,022,948.00	$ -
	TRANSPORTATION		$ 1,251,678.00		$ -	$ 1,251,678.00	$ 790,638.00
	INITIAL EXAM & CLASS	1,682	$ 2,419,948.00	310	$ 402,892.00	$ 2,822,840.00	$ 260,633.00
	ANNUAL EXAM & CLASS	2,603	$ 969,357.00	0	$ -	$ 969,357.00	
	CORRECTIVE SPEECH	3,068	$ 2,796,175.00	0	$ -	$ 2,796,175.00	$ 816,598.00
	SUPPLEMENTARY INSTRUCTION	1,924	$ 1,557,440.00	0	$ -	$ 1,557,440.00	$ 841,123.00
		34,406	$30,894,780.00	4,618	$1,901,252.00	$ 32,796,032.00	$ 5,330,899.00
2021-22	COMPENSATORY EDUCATION	26,312	$23,570,290.00	10,015	$7,695,996.00	$ 31,266,286.00	$ 6,469,094.00
	E.S.L.	1,119	$ 1,022,207.00	931	$ 737,378.00	$ 1,759,585.00	$ 232,076.00
	TRANSPORTATION		$ 264,520.00		$ 240,947.00	$ 505,467.00	$ 76,825.00
	INITIAL EXAM & CLASS	1,557	$ 2,064,847.00	190	$ 251,972.00	$ 2,316,819.00	$ -
	ANNUAL EXAM & CLASS	2,865	$ 1,088,700.00	0	$ -	$ 1,088,700.00	
	CORRECTIVE SPEECH	3,073	$ 2,857,890.00	701	$ 372,558.00	$ 3,230,448.00	$ 757,125.00
	SUPPLEMENTARY INSTRUCTION	1,667	$ 1,376,942.00	354	$ 121,009.00	$ 1,497,951.00	$ 619,169.00
		36,593	$32,245,396.00	12,191	$9,419,860.00	$ 41,665,256.00	$ 8,154,289.00
2022-23	COMPENSATORY EDUCATION	28,589	$28,254,795.00	4,580	$3,323,490.00	$ 31,578,285.00	$ 2,724,132.00
	E.S.L.	1,593	$ 1,596,584.00	809	$ 632,320.00	$ 2,228,904.00	$ 239,471.00
	TRANSPORTATION		$ 465,978.00		$ 34,480.00	$ 500,458.00	$ 44,031.00
	INITIAL EXAM & CLASS	2,003	$ 2,656,319.00	96	$ 127,313.00	$ 2,783,632.00	$ 391,959.00
	ANNUAL EXAM & CLASS	2,450	$ 931,000.00	464	$ 176,320.00	$ 1,107,320.00	
	CORRECTIVE SPEECH	1,584	$ 1,473,120.00	2,012	$1,382,817.00	$ 2,855,937.00	$ 382,913.00
	SUPPLEMENTARY INSTRUCTION	1,433	$ 1,183,658.00	499	$ 246,726.00	$ 1,430,384.00	$ 645,049.00
		37,652	$36,561,454.00	8,460	$5,923,466.00	$ 42,484,920.00	$ 4,427,555.00
2023-24	COMPENSATORY EDUCATION	35,903	$32,279,669.00	0	$ -	$ 32,279,669.00	
	E.S.L.	2,158	$ 1,975,865.00	631	$ 519,969.00	$ 2,495,834.00	
	TRANSPORTATION		$ 366,065.00		$ 64,860.00	$ 430,925.00	
	INITIAL EXAM & CLASS	1,553	$ 2,059,542.00	0	$ -	$ 2,059,542.00	
	ANNUAL EXAM & CLASS	2,147	$ 815,860.00	0	$ -	$ 815,860.00	
	CORRECTIVE SPEECH	3,342	$ 3,108,060.00	0	$ -	$ 3,108,060.00	
	SUPPLEMENTARY INSTRUCTION	1,956	$ 1,615,656.00	0	$ -	$ 1,615,656.00	
	TOTAL	47,059	$42,220,717.00	631	$ 584,829.00	$ 42,805,546.00	

Note. Chapter 192 and Chapter 193 Allocations and Expenditures, provided by the New Jersey Department of Education.

For FY 24, Lakewood Public School District received $42,220,717 for Chapter 192 and 193 services. The majority of this funding, $32,279,669, is allocated for compensatory education, followed by $3,108,060 for speech services. It is important to note that Chapter 192 funding can support services for students who are

not eligible under IDEA. As such, the Services numbers listed in the chart above likely reflect support for all nonpublic school students.

Idea Equitable Services

Equitable services are special education and related services, including direct services, provided to parentally placed private and homeschool students with disabilities in accordance with the provisions of IDEA and its implementing regulations in 34 C.F.R. §§ 300.130 through 300.14.[125] Services are provided in accordance with a service plan for eligible students following consultation with private schools and homeschool parents.

Child Find and Eligibility

The local education agency (LEA) that is the District of location (i.e., the District where the private school is located) is responsible for the identification and determination of eligibility for special education and related services for students parentally placed in private schools.

As referenced above, OnTrack is contracted to conduct the initial evaluations and reevaluations for students parentally placed in nonpublic schools and to develop service plans for eligible students. Lakewood Public School District taps Chapter 193 funding for staffing to manage and fulfill these responsibilities. Though the District contracts for these services, it remains as the LEA and is responsible for adhering to IDEA requirements around evaluation practices and eligibility determinations. The District states that is has a robust approach to managing the delivery of OnTrack's services and compliance with federal and state requirements, though it is unclear to what extent the auditing of OnTrack's services occurs.

The following chart shows the number of students eligible for special education and receiving services at their nonpublic schools through IDEA funding.

TABLE 37: NONPUBLIC IDEA SCHOOL AGE STUDENTS ELIGIBLE AND SERVED UNDER IDEA, AGES 3-21, 2021-2024

	2021		2022		2023		2024	
	Eligible	*Served*	*Eligible*	*Served*	*Eligible*	*Served*	*Eligible*	*Served*
Brick	70	73	73	73	63	81	67	82
Jackson	1	1	1	1	1	0	0	0
Jersey City	117	126	124	246	112	79	186	181
Lakewood	**7,683**	**700**	**7,922**	**750**	**8,651**	**800**	**9,698**	**800**
Toms River	161	169	145	144	127	143	103	156

Note: Data retrieved from "IDEA Grant Applications:" https://njdoe.mtwgms.org/NJDOEGmsWeb/Logon.aspx

In 2021, Lakewood Public School District served 9.1% of eligible nonpublic students under IDEA Equitable Services. In 2024, 8.2% of eligible students were served. This distribution differs substantially from peer Districts, in that these Districts provide equitable services to the majority of their eligible students. Eligibility numbers are derived from the previous school year, yet funding is to provide services for students eligible in the current year. This could mean that the number of students served is potentially greater than those found eligible.

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[125] Code of Federal Regulations, 34 CFR §300.130-14, retrieved from https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-300/subpart-A/subject-group-ECFR0ec59c730ac278e/section-300.39

TABLE 38: NONPUBLIC IDEA SCHOOL AGE STUDENTS ELIGIBLE AND SERVED UNDER IDEA, AGES 3-5, 2021-2024

	2021		2022		2023		2024	
	Eligible	*Served*	*Eligible*	*Served*	*Eligible*	*Served*	*Eligible*	*Served*
Brick	0	0	0	0	0	0	0	0
Jackson	0	0	0	0	0	0	0	0
Jersey City	0	0	0	2	10	0	1	3
Lakewood	**281**	**150**	**320**	**150**	**319**	**200**	**377**	**200**
Toms River	0	0	0	0	0	0	0	0

Note: Data retrieved from "IDEA Grant Applications:" https://njdoe.mtwgms.org/NJDOEGmsWeb/Logon.aspx

For eligible students ages 3-5, Lakewood Public School District served an average 53.9% across the four years. Jersey City PS was the other peer District to identify eligible students in this age range, albeit with only a few students.

Funding Calculation and Allocation

As cited on the NJDOE website:

> Section 612(a)(10)(A) of the IDEA and its implementing regulations 34 CFR §§300.130 through 300.144 require that LEAs, after timely and meaningful consultation with private school representatives, conduct a thorough and complete child-find process to determine the number of parentally placed children with disabilities attending private schools located within the LEA regardless of where those students live. IDEA establishes that the District where the private school is located (District of location) is responsible to provide services to parentally placed students after consulting with the eligible nonpublic schools within the District.[126]

On the IDEA grant application each year, Districts must submit the following information for each parentally placed private school student.

TABLE 39: EXAMPLE OF REQUIRED IDEA GRANT APPLICATION NONPUBLIC STUDENT INFORMATION[127]

County Code (2 digit)	District Code (4 digit)	Private School Code	Name of Private School or Private Preschool School	Student's Initials	Student was between ages 3 and 5 on 10/15/22 (Y/N)	Student was between ages 6 and 21 on 10/15/22 (Y/N)	Eligible and Receiving Services (Y/N)	Eligible and *Not* Receiving Services (Y/N)
e.g., 02	0010	020	Holy Spirit	DS	Y	N	Y	N

Note. Retrieved from "Special Education Policy and Procedures" provided by Official Site of the State of New Jersey (Special Education Policy and Procedures (nj.gov)

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[126] *Legal protections and responsibilities.* (n.d.). New Jersey Department of Education. https://www.nj.gov/education/specialed/home/docs/3.13.17NPFAQ.shtml

[127] *New Jersey policies and procedures in special education.* (n.d.). New Jersey Department of Education. https://www.nj.gov/education/specialed/policy/

Based on the student counts submitted, the nonpublic share of funding is calculated. The District where the private school is located is responsible to report all identified students with disabilities in NJ Smart (ages 3-21) even if they are not receiving services.[128] As described by NJDOE:

> the determination of the IDEA nonpublic proportionate share starts with the determination of the number of parentally placed private school children with disabilities (both resident and nonresidents) in the area served by the LEA (as reported in NJ SMART). The number of parentally placed private school children with disabilities in the area served by the LEA is then divided by the total number of children with disabilities in the area served by the LEA – both public and private.[129]

It is up to the LEA to determine how these IDEA funds will be spent, in accordance with the regulations and in consultation with the private schools. IDEA funds for equitable services may not be paid directly to a private school. Federal guidance is clear about these regulations, specifically:

> Under 34 C.F.R. § 300.141, an LEA may not use IDEA Part B funds to finance the existing level of instruction in a private school, and such funds may not be used for meeting the needs of a private school or the general needs of the students enrolled in the private school. The LEA must use the proportionate share of IDEA Part B funds to meet the special education and related services needs of parentally-placed private school children with disabilities.[130]

It should be noted that Districts are not required to serve every eligible student, instead working in consultation with nonpublic school representatives and families to determine how these funds should be distributed. Eligible students not receiving services under IDEA Equitable Services could be receiving them under Chapters 192 and 193.

In the charts and descriptions below, IDEA grant information across comparable Districts is displayed and analyzed.

TABLE 40: IDEA SCHOOL AGE BASIC GRANT FUNDING ALLOCATION COMPARISONS, 2021-2024

	2021		2022		2023		2024	
	Ages 3-21	Nonpublic Share	Ages 3-21	Nonpublic Share	Ages 3-21	Nonpublic Share	Ages 3-21	Nonpublic Share
Brick	$2,538,680	$96,423	$2,503,756	$102,624	$2,586,338	$100,642	$2,726,010	$104,967
Jackson	$1,969,725	$1,244	$1,910,982	$1,255	$1,972,058	$0	$2,095,592	$0
Jersey City	$8,779,214	$255,896	$8,030,989	$261,102	$8,469,600	$222,687	$8,720,595	$637,340
Lakewood	**$9,294,745**	**$7,635,963**	**$9,571,144**	**$7,815,152**	**$10,421,267**	**$8,983,099**	**$11,763,964**	**$10,052,597**
Toms River	$3,852,009	$210,371	$3,695,245	$186,110	$3,911,105	$190,165	$4,147,878	$142,032

Note: Data retrieved from "IDEA Grant Applications:" https://njdoe.mtwgms.org/NJDOEGmsWeb/Logon.aspx

In 2021, Lakewood Public School District nonpublic share was 82.1% of the District's total IDEA school age basic allocation. In 2024, this percentage increased to 85.5%. Comparatively, Jersey City's IDEA non-public share, which is the second highest across Districts analyzed, in 2021 was 2.9% and in 2024 was 7.3%.

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[128] *Legal protections and responsibilities.* (n.d.). New Jersey Department of Education. https://www.nj.gov/education/specialed/home/docs/3.13.17NPFAQ.shtml
[129] Ibid.
[130] *Questions and answers on serving children with disabilities placed by their parents in private schools* (PDF). (2020, December). United States Department of Education. https://sites.ed.gov/idea/files/qa-parentally-placed-private-schools-12-2020.pdf

TABLE 41: IDEA PRESCHOOL BASIC GRANT FUNDING ALLOCATION COMPARISONS, 2021-2024

	2021		2022		2023		2024	
	Ages 3-5	*Nonpublic Share*	*Ages 3-5*	*Nonpublic Share*	*Ages 3-5*	*Nonpublic Share*	*Ages 3-5*	*Nonpublic Share*
Brick	$100,110	$0	$101,391	$0	$110,920	$0	$110,526	$0
Jackson	$67,372	$0	$68,061	$0	$76,008	$0	$75,773	$0
Jersey City	$194,503	$0	$190,676	$0	$229,177	$0	$222,456	$1,171
Lakewood	**$324,843**	**$165,664**	**$339,535**	**$182,301**	**$404,922**	**$185,865**	**$410,994**	**$221,984**
Toms River	$128,128	$0	$129,072	$0	$147,401	$0	$146,366	$0

Note: Data retrieved from "IDEA Grant Applications:" https://njdoe.mtwgms.org/NJDOEGmsWeb/Logon.aspx

Aside from a small set aside for Jersey City, Lakewood is the only District with non-public share IDEA set aside for preschool. In 2021, this allocation was 50.1% of the District's total preschool allocation. In 2024, this increased to 54.0%.

For FY 24, the District planned to use IDEA Equitable Services funds for three distinct services:

- Nonpublic Supplemental Services Program (NPSSP)
- In-Class Resource Program (ICRP), and
- Paraprofessional Support Services

Of the 124 nonpublic schools who participated in the consultation meeting about IDEA Equitable Services, the following 50 schools receive these services for their students. This equates to approximately $235,279 per site. Service Plans are written for eligible students in these 50 schools:

- BAIS CHINUCH L'BONOS BAYIS RUCHEL
- BAIS KAILA TORAH PREP HS
- BAIS REUVEN KAMENITZ
- BAIS TOVA INC.
- BAIS YAAKOV BNOS CHAYIL
- BAIS YAAKOV OF JACKSON
- BNOS DEVORAH
- BNOS ESTHER MALKA
- BNOS ORCHOS CHAIM
- BAS YISROEL
- CALVARY ACADEMY
- CHINUCH L'BANOS T/A TIFERES CHAYA
- CONG. MIKOR HATORAH
- CONGREGATION VORKA EDUCATION CENTER
- JEWISH EDUCATION FOR GIRLS, INC./ B
- KESSER BAIS YAAKOV
- KOCHVEI OHR
- LAKEWOOD CHEDER SCHOOL
- MORESHES BY
- NACHLAS BAIS YAAKOV INC
- NEEMAS BAIS YAAKOV
- NESIVOS HATORAH
- SANZ OF LAKEWOOD – BOYS

- SEPHARDIC BET YAAKOV
- SHIRAS RUCHAMA
- TALMUD TORAH BAIS AVROHOM
- TALMUD TORAH OF LAKEWOOD
- TALMUD TORAH TOLDOS YAKOV YOSEF
- TASHBAR OF LAKEWOOD
- TORAS IMECHA, INC.
- UTA OF LAKEWOOD
- UTA OF LAKEWOOD, INC.
- YESHIVA BAIS HACHINUCH
- YESHIVA EVEN YISROEL
- YESHIVA KOL TORAH
- YESHIVA MASORAS AVOS
- YESHIVA OHR YEHUDA
- YESHIVA ORCHOS CHAIM
- YESHIVA BAIS HATORAH DBA TORAH INST
- YESHIVA SHAGAS ARYEH
- YESHIVA TIFERETH TORAH
- YESHIVA TORAS ARON
- YESHIVA YESODEI HATORAH/CHEDER BAIS
- YESHIVAS OHR YISSOCHOR ACADEMY
- YESHIVAT OR HACHAIM OF LAKEWOOD
- YESHIVAT YAGDIL TORAH
- ZECHER YOCHANAN
- S.C.S.C, INC./MEKAR HACHINUCH
- BNOS BASYA INC
- TIFERES BAIS YAAKOV

Aside from citing that it consulted with the nonpublic school community, the District was not able to provide information about how it was determined that services would be provided in these select schools nor answer why only a fraction of those eligible were served. This funding, to the extent it was described, is used for teaching and paraeducator staffing in nonpublic schools.

Between the required nonpublic equitable services set-aside and the mandatory CCEIS set-aside because of the significant disproportionality findings in FY 24, the District has little, if any, IDEA funds to support students with disabilities in its public schools. While CCEIS funds can be spent to support initiatives for students with disabilities, these funds must be focused on preventative intervention measures, not to support programming, supplies, or staffing specifically for special education.

FINANCIAL PRACTICES ANALYSIS

PCG partnered with AAFCPAs to conduct a forensic analysis and discovery in the following areas:

- **Financial Data Analytics** - These are financial analytics, using the Caseware IDEA Audit Tool by CaseWare International, that were run on the entire general ledger (GL) and were filtered by account.
- **Internal Controls Testing** – This analysis focused on:
  o Governance
  o Higher risk financial controls
  o Application controls that relate to supporting financial controls
  o Segregation of duties Service provider/vendor selection.

AAFCPAs followed the Statements for Consulting Standards, from the Association of International Certified Professional Accountants (AICPA), for this analysis. The findings reported here did not constitute an audit or examination, the objective of which is the expression of an opinion on financial statements, on other subject matter or on management's assertion.

SUMMARY

- **General Ledger**. There was no questionable activity noted in the General Ledger activity based off Caseware IDEA testing.
- **Vendor Management Controls.** There are significant deficiencies noted on the vendor management controls in the procure to pay cycle as internal controls related to vendor selection, review and retention are not operating effectively.
- **Payroll Processing Controls.** There are significant deficiencies noted on the payroll processing cycle, as internal controls related to review and completion of the payroll register and payroll processing checklist, respectively, are not operating effectively.
- **Financial Close Controls.** There are deficiencies noted on the finance close cycle, as internal controls related to completion of close process checklist are review of cash flow statements are not operating effectively.
- **Governance and IT Cycle Controls**. There are significant deficiencies noted on the Governance and IT cycle as internal controls related to completion of employee handbook acknowledgement, new hire training and approval of access, termination requests are not operating effectively.

FINANCIAL DATA ANALYTICS – CASEWARE IDEA TESTING

AAFCPAs conducted testing on Lakewood Public School District's general ledger (GL) for the years ending June 30, 2018 – June 30, 2023. For each school year, AAFCPAs tested the GL for completeness, as well as examine any outlying activity identified by Caseware IDEA Data Analytics software. During the testing, AAFCPAs noted that each year total debits equaled total credits, and each school year's total debits and credits tied to the noted beginning and ending balances in each of the GLs. When testing the date range in each year's GL, AAFCPAs noted there were entries booked at 12/31/202X in the period following the year end. AAFCPAs reviewed these entries and noticed each year there were budget adjustments made. AAFCPAs noted this is a yearly entry and was not deemed to be significant concern.

AAFCPAs examined entries made to the general journal for each year, noting entries were related to fund balancing entries which again were not deemed a significant concern. AAFCPAs examined activity related to checks, examining checks written on weekends, any gaps in the check number sequence, and duplicate checks. AAFCPAs noted that while there were checks that had issue dates on weekends, these dates all fell on the first of the month and were related to recurring monthly payments; therefore, there was no significant concern noted. There were gaps in the check sequences noted, but these were all explained by voided checks that were also recorded in the GL. Therefore, there was no significant concern noted here

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either. AAFCPAs did not note any duplicate checks. AAFCPAs ran a Benford's Law[131] analysis on each GL, with each of the tests resulting in acceptable conformity, meaning there were no instances of the first two digits of a number appearing more than expected in the analysis.

AAFCPAs also ran IDEA's Exception Exceptions Smart Analyzer tool on each GL to isolate general journal entries that could be of concern. AAFCPAs notes that IDEA's Exception Exceptions Smart Analyzer tool runs 24 tests on the GL then comes up with a risk score based on the content of the entries. The tool then returns a sample of entries to examine. AAFCPAs notes the following tests were run on the general journal entries posted to each year's GL.

TABLE 42. IDEA EXCEPTIONS SMART ANALYZER

Test #	IDEA Exceptions Smart Analyzer
Test 01	Out of Balance Journal Entries
Test 02	Potential Duplicate Journal Entries by User
Test 03	Potential Duplicate Journal Entries
Test 04	Journal Entries Posted on Weekends
Test 05	Journal Entries Posted on Unusual Day
Test 06	Journal Entries Posted on Unusual Time
Test 07	Journal Entries Posted at the End of Year-End
Test 08	Back-Dated Journal Entries
Test 09	Journal Entries with Rounded Amount
Test 10	Journal Entries with Recurring Digits
Test 11	Journal Entries with Keywords of Interest
Test 12	Journal Entries with Little or No Description
Test 13	Unusual-Rare Accounts Posting Combination
Test 14	Complex Account Combinations
Test 15	Unusual Accounts for Document Type
Test 16	Entries with Opposite as Normal Debits and Credits
Test 17	Unusual Users Posting Entries
Test 18	Journal Entries with High Value Amounts
Test 19	Benford's Law First Two Digits
Test 20	Benford's Law Summation
Test 21	Benford's Law Second Order

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[131] Gill, J. (2019, May 16). *What Is Benford's Law and Why do Fraud Examiners Use it?*. ACFE Insights. https://www.acfeinsights.com/acfe-insights/what-is-benfords-law
*Fraud examiners use Benford's Law tests on natural numbers, like payment amounts. Benford's Law provides an extra method for fraud examiners to test data for potentially fraudulent activity.

Test #	IDEA Exceptions Smart Analyzer
Test 22	Benford's Law Last Two Digits
Test 23	Outliers Detection - Machine Learning
Test 24	Incorrect Credits or Debits

Note: Caseware IDEA's Exception Exceptions Smart Analyzer Tool Tests

AAFCPAs reviewed the entries that were produced as a sample of the testing and noted all entries were in line with typical entries made by a school. None of the entries were deemed suspicious. Overall, AAFCPAs notes there was no questionable activity noted in the GL activity based off IDEA testing.

Vendor to Employee Comparison – IDEA Testing

In order to test whether there were any employees listed as vendors, AAFCPAs took Lakewood's employee master file and Lakewood's accounts payable master file and compared the listing using IDEA's "fuzzy lookup" feature. This feature scores comparisons between two sets of data based on how similar two line items are. As a result of this testing, AAFCPAs determined that there were no employees who were also set up as vendors. Further, no vendors were noted as a concern based on this manner of analysis.

INTERNAL CONTROLS TESTING

AAFCPAs inspected the District's policy manual and conducted process walkthroughs to identify key internal controls over financials reporting. AAFCPAs tested these controls for design, implementation, and operating effectiveness over the period of July 2020 to June 2023. The results are presented below.

Procure to Pay Testing Cycle

TABLE 43. RESULTS OF PROCURE TO PAY TESTING CYCLE

	Control Activity	Results of Testing
PTP 1	Federal procurement chart thresholds are listed in the financial policy manual and is approved by School Board.	Control is designed properly, implemented, and is operating effectively.
PTP 2	Purchase Requisitions / purchase orders require approval in accordance with the approval process listed in financial policy manual.	Control is designed properly, implemented, and is operating effectively.
PTP 3	Vendor master file is maintained in Series 3000 and quarterly review of vendors is performed by CFO.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with the Lakewood Accounting manager, it was noted that there is no evidence of review available for the vendor master file.

Control Activity		Results of Testing
PTP 4	New vendors and changes to existing vendors are approved by the School Board.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with the Lakewood Accounting Manager, it was noted that board approval is not taken at the time of vendor onboarding and the approval of the bill list for making payments is considered as the approval for vendors. See appendix.
PTP 5	All vendors are required to have a W-9 and NJ certificate of business to conduct business.	Control is designed properly but not operating effectively, as there were no W-9 and business registration certificate retained for 14 out of 21 vendors selected. See appendix.
PTP 6	3-way match is completed by: Packing slip and materials received matched to purchase order by the Shipper/Receiver and receipt of goods is created. Receipt of goods matched to invoice by purchasing associate.	Control is designed properly, implemented, and is operating effectively.
PTP 7	Checks are stored under locked cabinets.	Control is designed properly, implemented, and is operating effectively.
PTP 8	The bill list along with related invoices are approved by the School Board on a monthly basis.	Control is designed properly, implemented, and is operating effectively.
PTP 9	Checks and wires require signatures from Board Secretary and/or Assistant Board Secretary and the Student Activity Fund Treasurer.	Control is designed properly, implemented, and is operating effectively.
PTP 10	Completed bank reconciliations for all bank accounts that reconciles the account balance per the bank statement to the general ledger are reviewed by the accounting manager. Reconciling items are investigated and resolved in a timely manner.	Control is designed properly, implemented, and is operating effectively.

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	Control Activity	Results of Testing
PTP 11	In online banking system, the initiator can enter a wire payment but cannot release or approve the wire payment. That process can only be completed by a different authorized signer.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, the conclusion is that this control is not operating effectively.
PTP 12	Access grants to the online banking system require board approval and Access Grants are also reviewed semi-annually.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, the conclusion is that this control is not operating effectively.
PTP 13	On a yearly basis, an Open PO report is run and reviewed for accuracy to ensure proper recording of payments.	Control is designed properly, implemented, and is operating effectively.
PTP 14	Series 3000 is configured to generate a message if a duplicate invoice is entered.	Control is designed properly but could not evidence implementation and operating effectiveness.

Note: AAFCPA's Results of Procure to Pay Testing Cycle

Overall Conclusion

There are significant deficiencies noted on the vendor management controls in the procure to pay cycle as internal controls related to vendor selection, review and retention are not operating effectively. The risk of material misstatement is deemed **high** for this cycle.

HR and Payroll Testing Cycle

TABLE 44. RESULTS OF HR AND PAYROLL TESTING CYCLE

	Control Activity	Results of Testing
HR 1	Background checks are completed for all new hires prior to their start date.	Control is designed properly, implemented, and is operating effectively.
HR 2	Each job has a defined job description and related skills requirement to ensure that the position is properly staffed.	Control is designed properly, implemented, and is operating effectively.
HR 3	Annual salary increases are approved by the School Board.	Control is designed properly, implemented, and is operating effectively.

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	Control Activity	Results of Testing
HR 4	Rate changes and department transfers are approved by the School Board.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, this conclusion is that this control is not operating effectively.
HR 5	Payroll manager reviews the pre payroll register on semi-monthly basis to ensure completeness and accuracy.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with Lakewood Payroll Manager, it was noted that evidence of review for the pre-payroll registers were not retained. The payroll manager confirmed that evidence would be retained going forward.
HR 6	System 3000 is configured with payroll checklist which is completed before payroll is processed.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with Lakewood Payroll Manager, it was noted that completed payroll checklist were not retained in Series 3000. The payroll manager confirmed that evidence would be retained going forward.
HR 7	For hourly employees, timesheets are approved by the supervisors.	Control is designed properly, implemented, and is operating effectively.
HR 8	For teachers getting paid for the extracurricular activities, the vouchers are approved by the principal.	Control is designed properly, implemented, and is operating effectively.
HR 9	Quarterly, payroll tax forms are prepared by the Payroll Manager and are reviewed by the CFO for completeness and accuracy.	Control is designed properly, implemented, and is operating effectively.

Note: AAFCPA's Results of HR and Payroll Testing Cycle

Overall Conclusion

There are significant deficiencies noted on the payroll processing cycle, as internal controls related to review and completion of the payroll register and payroll processing checklist, respectively, are not operating effectively. Therefore, risk of material misstatement is deemed **high** for this cycle.

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Financial Close Controls Testing Cycle

TABLE 45. RESULTS FOR FINANCIAL CLOSE CONTROLS TESTING CYCLE

	Control Activity	Results of Testing
FSP 1	A detailed Close Process Checklist is maintained and completed on a monthly basis for preparing the financial statements.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with Lakewood Accounting Manager, it was noted that Close Process Checklist is not completed nor retained as evidence.
FSP 2	The Series 3000 accounting system will not process a journal entry if the entry does not balance and will generate an error message, which is displayed for the individual posting the entry to resolve.	Control is designed properly, implemented, and is operating effectively.
FSP 3	General Ledger Balance Sheet Accounts are reconciled and reviewed by someone other than the preparer on a monthly basis.	Control is designed properly, implemented, and is operating effectively.
FSP 4	Financial reports and cash reports are approved by the School Board and Treasurer respectively on a monthly basis.	Control is designed properly, implemented, and is operating effectively.
FSP 5	Cash flows are prepared by CFO and is reviewed by state monitors on a monthly basis.	Control is designed properly but could not evidence implementation and operating effectiveness. Per discussion with Lakewood Accounting Manager, it was noted that the State Monitor verbally reviews the cash flow statements on a monthly basis and the evidence of review is not retained.
FSP 6	Chart of accounts are initially approved by New Jersey's DOE and any small changes to the chart of accounts are approved by the CFO.	Control is designed properly, implemented, and is operating effectively.
FSP 7	Annual budget is prepared and approved by the School Board and NJ DOE.	Control is designed properly, implemented, and is operating effectively.

Note: AAFCPA's Results of Financial Close Controls Testing Cycle\

Overall Conclusion

There are deficiencies noted on the finance close cycle, as internal controls related to completion of close process checklist are review of cash flow statements are not operating effectively. Therefore, the risk of material misstatement is deemed **medium** for this cycle.

Governance and IT Testing Cycle

TABLE 46. RESULTS FOR GOVERNANCE AND IT TESTING CYCLE RESULTS

	Control Activity	**Results of Testing**
GovIT 1	An employee handbook with the code of conduct is maintained. All new employees are required to sign an acknowledgement form stating that they have read and understood the handbook, this is done as soon as reasonably possible upon hire and existing employees sign an acknowledgement at least on a yearly basis.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, the conclusion is that this control is not operating effectively.
GovIT 2	The responsibilities and authorities of individuals are defined and made available via the job descriptions and SOD matrix. Segregation of Duties exist between various functions	Control is designed properly, implemented, and is operating effectively.
GovIT 3	The district has a whistleblower policy which was provided to all employees of the Company.	Control is designed properly, implemented, and is operating effectively.
GovIT 4	The School Board meets on a monthly basis to discuss financial reports, personnel changes and provides updates on regulations and legal matters.	Control is designed properly, implemented, and is operating effectively.
GovIT 5	Unique user IDs and passwords are used for three different modules in Series 3000 and MFA is deployed for all internal applications.	Control is designed properly, implemented, and is operating effectively.
GovIT 6	Series 3000 access is reviewed at least on a quarterly basis.	Control is designed properly, implemented, and is operating effectively.
GovIT 7	Back up of the Series 3000 system is conducted on a daily basis.	Control is designed properly, implemented, and is operating effectively.

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Control Activity		Results of Testing
GovIT 8	All new hires are required to undergo a series of training programs including security awareness and general IT trainings and all existing employees are required to complete these trainings at least on an annual basis.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, the conclusion is that this control is not operating effectively.
GovIT 9	Admin access to the Series 3000 is restricted to the authorized individuals.	Control is designed properly, implemented, and is operating effectively.
GovIT 10	All new hires are approved by the School Board and Superintendent and are communicated to IT for access implementation by the HR and access is approved by the CFO.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, the conclusion is that this control is not operating effectively.
GovIT 11	All terminations are approved by the superintendent are communicated to IT by HR. The access is revoked at the last working day.	Control is designed properly but could not evidence implementation and operating effectiveness. Assumption: AAFCPAs has made three requests for evidence to test the control; however, no evidence was provided. Therefore, this conclusion is that this control is not operating effectively.

Note: AAFCPA's Results of Governance and IT Testing Cycle

Overall Conclusion

There are significant deficiencies noted on the Governance and IT cycle as internal controls related to completion of employee handbook acknowledgement, new hire training and approval of access, termination requests are not operating effectively. Therefore, the risk of material misstatement is deemed **high** for this cycle.

TRANSPORTATION

This section reviews transportation practices for the Lakewood Public School District, including transportation for students being transported within the district, for out of district placements and for those attending a non-public school.

SUMMARY

PCG made several major observations regarding Lakewood Public School District's transportation services:

- Lakewood is unique in that it serves more resident students (40,958) than all other districts in New Jersey due to a high number of nonpublic school students. The district serving the next closest number is Toms River, also in Ocean County, serving 14,097 students
- The Lakewood Student Transportation Authority (LSTA) appears to be an innovative solution that effectively helps Lakewood meet its significant nonpublic school student transportation obligations while helping the town satisfy its desire to provide courtesy transportation
- There is not sufficient separation between Lakewood as contracting agency and the LSTA as vendor
- There are potential opportunities to lower prices by bidding tiered routes as packages rather than individually. Some buses are running four to eight routes a day at a total cost of over $200,000 per bus

SCHOOL TRANSPORTATION IN NEW JERSEY

In New Jersey, state law mandates that local districts provide transportation for public school students and certain private school students. The law also allows local districts to provide locally funded transportation for some students not entitled to mandated transportation.

Public School Students

Public school students are entitled to transportation when they are in one or more of the following situations:

- Live "remote" from the school, i.e., beyond two miles for students in grades preschool through eight and beyond 2.5 miles for students in grades nine through twelve
- Transportation is required per the student's individualized education plan (IEP)
- Transportation is required for an out-of-district special education placement

Transportation may be waived in writing by parents/guardians subject to district board policies.

Districts **may**, at local expense, provide transportation to public school students who are not entitled to state-supported mandatory transportation (subject to board policy) in the following situations:

- Student lives closer than "remote" from the school
- A hazard condition exists (for example, inadequate sidewalk)

This non-mandated transportation is also known as courtesy busing. Under some circumstances, districts may charge families for all or part of the cost of courtesy busing. Districts must make accommodations for financial hardship so that students are not excluded from receiving transportation services if there is a fee involved. Also, further rights and restrictions on public charter and choice student transportation exist in New Jersey law. Homeless students, students residing in resource family homes, students in group homes, and students in shared custody homes benefit from specific school transportation regulations that may confer additional transportation rights.[132]

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[132] *N.J.A.C. 6A:27, Student Transportation.* (n.d.). Subchapter 1: General Provisions. https://www.nj.gov/education/code/current/title6a/chap27.pdf

Nonpublic School Students

If the school district receives state aid for transportation, nonpublic school students residing in the district are entitled to district funded transportation or aid in lieu of transportation (AIL) when they are in all of the following situations:

- Live "remote" from the school, i.e., beyond two miles for students in grades kindergarten through eight and beyond 2.5 miles for students in grades nine through twelve (no preschool unless IEP-mandated)
- Attending a nonpublic school that is not wholly or partly operated for profit
- Attending a nonpublic school that is within certain distance limitations set forth by state law
- Are in grades K-12 (not preschool)

Districts may also provide locally funded courtesy transportation for nonpublic school students in the same manner as they may do for public school students.[133]

State Transportation Aid

New Jersey provides state transportation aid for students receiving mandatory transportation from their districts of residence. For Fiscal Year 2024, the state maximum per pupil transportation formula amount is $1,165 per student.[134] Of this maximum, $441 is state aid and the balance ($724) is provided by the local school district. Students whose IEPs specify that oxygen, a nurse or aide, a wheelchair lift, or extended school year is warranted bring additional transportation state aid to the district. Districts must often pay more than the state maximum to transport students. Any excess cost is the responsibility of the district.

Under certain circumstances districts are required to provide AIL payments to families of nonpublic, charter, or choice students. AIL payments are set at the state maximum transportation formula amount. Districts are not required to cover costs in excess of the state maximum if AIL payments are requested by families.[135]

Coordinated Transportation Services Agency (CTSA)

New Jersey state law allows certain governmental entities to act as Coordinated Transportation Services Agencies (CTSAs) to maximize efficiency. These entities provide districts with additional options for transporting nonpublic school students, students with special education transportation needs, and vocational students. CTSAs may transport public and nonpublic students who are mandated to receive transportation or, if the CTSA's policy allows, courtesy busing. CTSAs are used to provide transportation for resident and non-resident students.[136]

The most a CTSA can charge a resident district for transportation per student is the state maximum amount or actual cost of transportation, plus an administrative fee. This fee is typically between 2% and 6%, paid by the district of residence. As with districts, CTSAs may charge families for all or part of the cost of courtesy busing unless financial hardship conditions apply.

LAKEWOOD PUBLIC SCHOOL DISTRICT TRANSPORTATION

Lakewood Public School District has an estimated 50,000 school-age children, of which about 4,600 are enrolled in public school. The district is responsible for transportation services for many of the over 45,000 nonpublic school students residing in the district. As of October 2023, the district financially supported transportation for 4,727 public school students (including charter school students) and over 36,231 nonpublic school students. **Table 47** shows the number of students that Lakewood Public School District

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[133] Ibid
[134] Sarlo, P.A. (2023, June 28). *State of New Jersey. NJ Legislature.* https://pub.njleg.state.nj.us/publications/budget/S2024.pdf
[135] Ibid
[136] Ibid

funded for transportation by school type, further split by mandated and courtesy transportation. Students receiving aid in lieu of transportation are included in the table.

TABLE 47: STUDENT TRANSPORTATION COUNTS BY SCHOOL TYPE AND MANDATED VERSUS COURTESY, FY 2024, LAKEWOOD PUBLIC SCHOOL DISTRICT

School Type	Mandated	Courtesy	Total
Public	2,502	1,779	4,281
Nonpublic	26,259	9,510	35,769
Nonpublic SWD	367	0	367
Charter (public)	325	121	446
Other/Not specified	95	0	95
Total	**29,548**	**11,410**	**40,958**

Note: Retrieved from "Lakewood all grades.xlsx" and "Lakewood routes 22 w-macros.xlsx," October 2023, provided by NJ Department of Education.

Additional courtesy transportation students are transported by the Lakewood Student Transportation Authority (LSTA) and are funded through government grants through the town and fees charged to families. The LSTA is further described later in this chapter. The LSTA transports roughly 25,000 mandated nonpublic students and 10,000 nonpublic school courtesy busing students each year.

Lakewood does not operate its own bus yard. All routes are contracted out and procured through a bid process. The district uses a standard state contract form and standard county competitive bidding process. Lakewood arranges transportation for public school students and contracts through the LSTA to provide services to nonpublic school students. Lakewood's relationship with the LSTA is contractual in nature, with contract renewal subject to the Lakewood Public School District Board of Education's approval.

Lakewood Public School District's transportation department is staffed by a coordinator, an assistant coordinator, two managers, a compliance and safety officer, and a clerk.[137] Routing is performed using the Versatrans student transportation management system which can create outputs for uploading into the state transportation system of record, DRTRS (District Report of Transported Resident Students). Versatrans is one of the leading school transportation systems on the market. The state uses entries in DRTRS to determine state transportation aid to districts.

A unique characteristic of Lakewood Public School District among New Jersey districts is the number of nonpublic school students Lakewood is required to transport in comparison to its public school student transportation count. An analysis of 2021-2022 statewide data indicates that Lakewood's responsibility for transportation dwarfs the next largest district, even if courtesy busing is removed. Furthermore, Lakewood has both a transient population and a growing population of nonpublic school students.

TABLE 48: TOP 20 NEW JERSEY SCHOOL DISTRICTS RANKED BY TOTAL STUDENTS PROVIDED TRANSPORTATION OR AID IN LIEU, LAKEWOOD PUBLIC SCHOOL DISTRICT

County	District	Regular Public	Regular Special Education	Special Education Special Needs	Nonpublic Transported	Nonpublic AIL	Courtesy	TOTAL
Ocean	Lakewood Twp	2137	0	1014	23229	2211	12367	40958
Ocean	Toms River Regional	5290	536	449	823	1885	5114	14097
Essex	Newark City	9012	4434	296	3	312	0	14057
Monmouth	Freehold Regional	6352	1321	460	74	587	2830	11624

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[137] *Lakewood Public School District (NJ) transportation.* (n.d.). https://www.lakewoodpiners.org/domain/32

Ocean	Jackson Twp	4600	750	357	1439	2428	1702	11276
Cumberland	Vineland City	6345	142	281	0	534	3210	10512
Middlesex	Edison Twp	4656	329	377	0	1222	3522	10106
Mercer	W Windsor-Plainsboro Reg	6192	27	225	148	305	2243	9140
Camden	Cherry Hill Twp	3088	472	354	56	572	4480	9022
Somerset	Franklin Twp	4593	552	484	23	770	2186	8608
Atlantic	Egg Harbor Twp	4953	669	423	222	458	1766	8491
Ocean	Brick Twp	3376	1115	337	426	78	3091	8423
Middlesex	Old Bridge Twp	4819	424	268	374	262	2032	8179
Somerset	Bridgewater-Raritan Reg	4706	316	343	0	428	2358	8151
Middlesex	Woodbridge Twp	3003	63	669	330	198	3836	8099
Middlesex	South Brunswick Twp	4703	41	309	47	207	2141	7448
Mercer	Hamilton Twp	3299	598	566	301	432	1998	7193
Middlesex	East Brunswick Twp	3418	492	362	34	180	2583	7069
Burlington	Lenape Regional	4538	1041	135	65	280	1004	7063
Middlesex	Monroe Twp	4489	636	181	0	310	1381	6997

Note: Retrieved from https://www.nj.gov/education/finance/fp/audit/2223/October2022_DRTRS_CountySummary.xlsx, 2022, provided by NJ Department of Education.

Lakewood Student Transportation Authority (LSTA)

The Lakewood Student Transportation Authority (LSTA) was initially enabled by Bill S2049 of the 2016-2017 Session of the New Jersey Legislature. The statute established a three-year pilot program to meet nonpublic student transportation needs. The law provided that an eligible district would pay the consortium the aid in lieu amount for each nonpublic school student who is required to be transported in accordance with state law. The consortium takes on responsibilities of the district for transportation of students the consortium receives payment for, including paying AIL if the cost to transport exceeds the AIL amount. If the consortium has funds available after transporting required students, it may provide courtesy busing. The consortium must refund any leftover funds to the district.[138]

The LSTA is the only consortium established under this law to support Lakewood Public School District. After the pilot, the LSTA was granted the authority to continue operating. In addition to the funds received from Lakewood, the LSTA receives grants from Lakewood Township of about $1.2 million per year to help pay for courtesy transportation. Furthermore, the LSTA has opted to collect a fee from parents (currently $260) for additional students to help fill seats on the bus and offset costs.[139]

Lakewood Student Transportation Authority functions similar to a coordinated transportation services authority (CTSA). However, a CTSA is a governmental entity and the LSTA is a non-profit limited-liability company. Districts typically cannot contract directly with religious schools for education support services, but a non-profit organization can.

The LSTA appears to be an innovative solution for meeting Lakewood's transportation mandates and the community's religious restrictions. Unlike a CTSA, LSTA cannot charge an administrative fee. One of the LSTA's advantages over Lakewood for operating nonpublic routes is its flexibility in charging for courtesy busing, which Lakewood cannot do because of the district's free and reduced lunch percentages. A study performed by Lakewood, NJ CPA firm HFA Certified Public Accountants and Advisors in 2020 found that

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[138] *Bill S2049 Session* (2016-2017). New Jersey Legislature. https://www.njleg.state.nj.us/bill-search/2016/S2049/bill-text?f=PL16&n=22_

[139] *Lakewood Student Transportation Authority LLC.* (2020, July). ProPublica. https://projects.propublica.org/nonprofits/organizations/813531813

the LSTA saves the district over $11 million versus the district bidding and managing all routes.[140] Any savings goes toward the LSTA providing courtesy transportation in accordance with the local government's preferences. PCG received only the summary documents for this study and cannot verify these findings.

The LSTA utilizes the same bid and contract forms as does Lakewood along with the same procurement practices. As a non-governmental entity, the LSTA has been responsive to requests for records. There is a lack of public-facing information on the LSTA's web presence. The LSTA uses the Versatrans school transportation management system (as does Lakewood) to track and route students and to generate uploads for DRTRS. The LSTA uses the same procedures as Lakewood to verify student residency in accordance with Board Policy 5111, "Eligibility of Resident/Nonresident Students." A compliance officer who works for Lakewood also monitors LSTA contractors to ensure bus safety standards.

Recent Legislation

In 2024, state legislation was enacted that further codified the LSTA and enabled other similar consortia to form.[141] There are several differences between the LSTA's enabling legislation from 2016 and the new law. The original was a three-year pilot program limited to one eligible district where the new law allows more than one and a consortium may be formed of schools in multiple counties or districts. The 2024 law also drops the size requirements for participating districts. A major change in the new program that differs from the 2016 pilot is that the new law does not allow the consortium to use savings to provide courtesy transportation; all savings must be returned to the district. Another major change is that the consortium, under the new law, may assess up to a six percent administrative charge, where there was no such fee allowed under the 2016 pilot.[142] The new law sunsets after the third year. Lakewood has been operating the LSTA after the original pilot through a series of waivers.[143] PGC has no information on if or how the new law will impact the future operation of the LSTA or the continued relationship between Lakewood and the LSTA.

Transportation Contract Vendor Analysis

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[140] *Executive Summary, Lakewood Transportation Analysis, 2020, HFA CPA*. (2023, May 8). Lakewood Public School District.
[141] Assembly no. 5412 state of New Jersey 220th legislature. (2023, May 8). State of New Jersey. https://pub.njleg.state.nj.us/Bills/2022/A5500/5412_R2.PDF
[142] Bill S2049 session 2016-2017. (n.d.). State of New Jersey. https://www.njleg.state.nj.us/bill-search/2016/S2049/bill-text?f=PL16&n=22_
[143] *Contract extension between Lakewood Board of Education and the Lakewood Student Transportation Authority*. (2023, August 30). Provided by Lakewood School Transportation Authority.

Table 49 displays the distribution among vendors of students transported between the five school types served by Lakewood Public School District. These figures are based on files extracted from DRTRS (District Report of Transported Resident Students) as of October 2023. Additional students receiving family-paid courtesy busing to fill the private school buses are not in the DRTRS database. All spelling and punctuation of vendor names are as they appear in the data file. Aid in lieu, parental transport, and vendors transporting fewer than ten students were pulled out of the analysis; counts of these students appear on the table.

TABLE 49: PERCENTAGE OF STUDENTS TRANSPORTED BY SCHOOL TYPE PER VENDOR, FY 2024, LAKEWOOD PUBLIC SCHOOL DISTRICT

Vendor (excluding AIL, Parent, <10 students)	% of students transported by school type					
	Public	Nonpublic	Nonpublic Students with Disabilities	Charter	Other	Students Transported
Baal Hagolo Transportation Corp	0%	100%	0%	0%	0%	196
Belz Institutions Of Lakewood	0%	100%	0%	0%	0%	174
Congregation Rachmistrivka, Inc.	0%	100%	0%	0%	0%	410
D.A.G. Transport LLC	25%	0%	60%	0%	15%	52
HT Bus Services	0%	100%	0%	0%	0%	1576
Jay's Bus Service	13%	87%	0%	0%	0%	23229
Klarr Transport Service	10%	72%	1%	17%	0%	2530
Masoras Avos Inc	0%	100%	0%	0%	0%	413
Meoros Nosson Bussing	0%	100%	0%	0%	0%	440
Presidential Transporttaion, LLC.	12%	88%	0%	0%	0%	3948
School Bound Transportation	49%	0%	51%	0%	0%	35
Seman Tov	12%	81%	7%	0%	0%	4108
Talmud Torah Toldos Yakov	0%	100%	0%	0%	0%	197
Talmud Torah Yesodei Hatorah	0%	100%	0%	0%	0%	133
Toras Imecha, Inc.	0%	100%	0%	0%	0%	623
UTA of Lakewood	0%	100%	0%	0%	0%	551
Subtotal (% of transported)	**11%**	**87%**	**1%**	**1%**	**0%**	
Subtotal (count of transported)	**4263**	**33589**	**337**	**428**	**14**	**38615**
AIL, Parent, <10	18	2180	30	18	81	2343
Total (count of transported)	**4281**	**35769**	**367**	**446**	**95**	**40958**

Note: Retrieved from "Lakewood all grades.xlsx" and "Lakewood routes 22 w-macros.xlsx," October 2023, provided by NJ Department of Education.

- The contractors with the largest numbers of students transported (Jay's Bus Service, Klarr Transportation Service, Presidential Transportation, and Seman Tov) have distributions between public and nonpublic school students transported that resemble the overall split between the two school types.
- Jay's Bus Services transports approximately 60% (20,245) of all students.
- Two vendors (D.A.G. Transport and School Bound Transportation) transport smaller numbers of students and appear to concentrate on serving students with special education needs.
- There are ten other contractors (Baal Hagolo Transportation, Belz Institutions of Lakewood, Congregation Rachmistrivka, HT Bus Services, Masoras Avos, Meoros Nosson Bussing, Talmud Torah Toldos Yakov, Talmud Torah Yesodei Hatorah, Toras Imecha, and UTA of Lakewood) transporting exclusively nonpublic school students.
- We assume based on our review of route data that the "Other" column represents students receiving IEP-required transportation

Transportation Route Analysis

Table 50 shows the average cost to Lakewood Public School District to transport each student by type of school and mandated versus courtesy transportation. Due to variability in the cost of transporting students with disabilities, this analysis excluded students whose IEP required special transportation accommodations. Students receiving aid in lieu of transportation are also excluded.

TABLE 50: AVERAGE TRANSPORTATION COST TO TRANSPORT STUDENTS BY SCHOOL TYPE, EXCLUDING IEP-REQUIRED AND AID IN LIEU

	School Type			
	Public	**Nonpublic**	**Charter**	**All Types**
Mandated	$1,652.73	$849.87	$895.30	$907.46
Courtesy	$1,129.41	$821.44	$846.50	$869.87
All	$1,397.45	$841.85	$881.38	$896.10

Note: Retrieved from "Lakewood all grades.xlsx" and "Lakewood routes 22 w-macros.xlsx," October 2023, provided by NJ Department of Education.

Lakewood Public School District handles transportation for the public school and public charter school students. The Lakewood Student Transportation Authority handles transportation for nonpublic school students. The LSTA pays less per student than Lakewood Public School District for students not requiring special transportation accommodations per their IEPs. **Table 51** may partially explain this cost difference in that Lakewood buses appear to run less full than LSTA routes. As with **Table 50**, IEP-required and AIL students are excluded.

TABLE 51: AVERAGE STUDENTS TRANSPORTED PER ROUTE, EXCLUDING IEP-REQUIRED AND AID IN LIEU

	School Type		
	Public	**Nonpublic**	**Charter**
Students transported	3647	33588	424
Number of routes	138	742	10
Students per route	26.4	45.3	42.4

Note: Retrieved from "Lakewood all grades.xlsx" and "Lakewood routes 22 w-macros.xlsx," October 2023, provided by NJ Department of Education.

PGC reviewed routes to determine whether the most expensive routes appeared unreasonable as far as cost per rider. Given that the most expensive routes are generally small ridership routes for IEP-required special education, without specifics we cannot tell if costs are excessive. However, observing that the most expensive routes are for IEP-required transportation is consistent with what we would expect in such a review.

Cost per route and students transported per route are two measures of efficiency of bus routes. Student ride time, empty miles and empty/idle time are other common measures. Determining these would require an analysis of routes in Lakewood's and the LSTA's Versatrans systems which were not available at the time of this report. The favorable cost per student of the LSTA routes could be a function of the high utilization of seats, shorter routes, more students per stop, and fewer stops. LSTA staff also believe their relationship with local vendors contributes to bids favorable to the LSTA and to contractor retention. According to LSTA, if there were an expectation that efficiency would result in a discount or refund to the district, there would be one. However, the LSTA is designed to meet the town's desire to provide courtesy busing and minimize children walking hazardous routes, and the LSTA does that with the savings and income from families.

In some cases, vendors are using the same buses to do separate routes, taking advantage of tiered schedules and cooperation between the nonpublic schools to ensure transportation services are available

but bidding as if the routes were stand-alone. There may be an opportunity for Lakewood and the LSTA to receive lower bids by monitoring these patterns of grouping by the vendors and soliciting pre-packaged groups of routes.

PCG found some extreme examples of the same bus being used for multiple routes. During the analysis we noted obvious data entry errors, but where those could be filtered out, significant examples remained of the same plate number used for several routes. Many districts employ double or even triple tier routes to alleviate driver shortages, leverage capital resources, or to help drivers and aides get enough hours for full-time pay and benefits. Four or higher tiers per bus are not common but the database analysis showed as many as eight routes per plate in some cases. New Jersey double tier routes cost in the $115,000 range; that number can be used as a reasonableness check in case routing practices are such that AM and PM routes are classified as separate routes. Special education routes can come with a higher-than-expected price tag per route, but then we would expect to see fewer riders on such routes so a lower ridership number could indicate a bus transporting high-needs special education students. **Table 52** displays the top 20 plate numbers, by cost, along with the operator and number of routes served by each bus.

TABLE 52: TOP 20 BUS PLATE NUMBERS BY SUM OF ROUTE COST

Plate	Ownership	Sum of Riders	Sum of Route Cost	Routes
Y456S1	Jay's Bus Service	315	$309,547.15	8
N269S1	Jay's Bus Service	295	$283,993.39	7
N271S1	Jay's Bus Service	252	$264,085.53	8
F2868S1	Seman Tov	54	$262,018.20	4
H583S1	Jay's Bus Service	213	$251,625.78	7
F164S1	Jay's Bus Service	213	$250,404.64	6
G621S1	Jay's Bus Service	288	$246,337.92	6
R518S1	Jay's Bus Service	233	$245,915.41	7
F823S1	Jay's Bus Service	282	$245,559.81	6
U241S1	Jay's Bus Service	185	$239,660.51	6
P518S1	Jay's Bus Service	229	$232,886.70	6
N639S1	Jay's Bus Service	274	$228,624.85	6
U236S1	Jay's Bus Service	243	$224,806.95	5
R154S1	Presidential Transporttaion, LLC.	260	$220,838.65	6
Y610S1	Presidential Transporttaion, LLC.	236	$213,902.40	6
L910S1	Jay's Bus Service	205	$212,960.50	5
H566S1	Jay's Bus Service	253	$212,617.76	5
R138S1	Seman Tov	36	$210,511.80	4
J421S1	Jay's Bus Service	231	$210,237.18	6
E434S1	Jay's Bus Service	230	$208,909.56	5

Note: Retrieved from "Lakewood all grades.xlsx" and "Lakewood routes 22 w-macros.xlsx," October 2023, provided by NJ Department of Education.

Staff Salaries

High salaries of senior transportation staff were noted during PCG's review of Lakewood Public School District's User-Friendly Budgets and the IRS 990 forms. More analysis is needed to see how the salaries compare to similar operations in New Jersey. Comparable districts for transportation administration purposes should reflect the number of students transported (regular and special education), not just district enrollment, due to the difference in effort and overhead for administering transportation for the nonpublic students in addition to the public and public charter students.

Lakewood Public School District Transportation Administration

Lakewood salaries were listed in the User-Friendly Budgets which contain the following narrative: "N.J.S.A. 18A:7F-5.3 requires that the user-friendly budgets contain detailed information on the salaries and benefits of each district superintendent, assistant superintendent, school business administrator and school district employee whose annual base salaries exceeds $75,000, and who is not a member of a collective bargaining unit."

Transportation administrator salaries from the Lakewood user-friendly budgets are as listed:[144]

- 2022-2023: Interim Transportation Manager, 1.0 FTE, 260 days, $150,800
- 2022-2023: Interim Transportation Manager, 1.0 FTE, 260 days, $78,000
- 2021-2022: Interim Transportation Manager, 1.0 FTE, 260 days, $135,000
- 2021-2022: Interim Transportation Manager, 1.0 FTE, 260 days, $110,000
- 2020-2021: Interim Transportation Manager, 1.0 FTE, 260 days, $130,000
- 2020-2021: Interim Transportation Manager, 1.0 FTE, 260 days, $104,000
- 2019-2020: No transportation salaries over $75,000 reported
- 2018-2019: Transportation Manager, 1.0 FTE, 260 days, $90,000
- 2017-2018: Coordinator/Director/Manager/Supervisor of Transportation, 1.0 FTE, 260 days, $92,250

Lakewood has two transportation managers for the 2023-2024 school year, neither of whom are listed above. According to the District website, is currently a Transportation Coordinator. Per review of Board minutes, the two Interim Transportation Managers were hourly employees of the district during 2022-2023, both at a rate of $100/hour. A current Transportation Coordinator who also works as Director for LSTA reported to PCG that he works for Lakewood approximately 22 hours per week and does not receive benefits from Lakewood.[145]

Lakewood Student Transportation Authority Senior Officers

Lakewood Student Transportation Authority senior officer salaries over $100,000 were listed in the IRS Form 990 for the LSTA. These senior officers and their salaries are as follows:[146]

- 2021-2022: Director, 50 hrs/wk, $257,028
- 2021-2022: Assistant Director, 50 hrs/wk, $113,539
- 2020-2021: Director, 50 hrs/wk, $224,028
- 2019-2020: Director, 50 hrs/wk, $218,367

Potential Dual Employment

PCG observed potential dual employment of a senior staff member between Lakewood's transportation department and LSTA, both positions being reported in User-Friendly Budgets and the LSTA IRS Form 990 as full-time. This could be problematic for several reasons, most concerning of all potential for procurement issues, diminished incentive to return saved funds to Lakewood, and potential for conflicts in

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[144] *2023-24 school district budget summaries/salaries & benefits.* (n.d.). https://www.nj.gov/education/finance/fp/ufb/
[145] *Meeting of the Lakewood Board of Education held on Wednesday, May 12, 2021.* (2021, May 12). https://www.lakewoodpiners.org/site/handlers/filedownload.ashx?moduleinstanceid=77&dataid=1590&FileName=May%2012%202020 21.pdf
[146] *Lakewood Student Transportation Authority LLC.* (n.d.). Propublica. https://projects.propublica.org/nonprofits/organizations/813531813

contract oversight of LSTA as a vendor. The total compensation to this staff member reported for FY 2022 from both sources is $392,028. The FY 2023 IRS 990 for LSTA is not yet publicly available.

The New Jersey Department of Education's manual on the student transportation contracting process states, "the bid process shall be designed to encourage free, open and competitive bidding. Bidding shall also be designed to prevent fraud, favoritism and extravagance, to safeguard the taxpayers, and protect the lowest responsible bidder."[147] Lakewood Board of Education District Policy 1540, Administrator's Code of Ethics, states that "no administrator or member of his/her immediate family shall have an interest in a business organization or engage in any business, transaction, or professional activity that is in substantial conflict with the proper discharge of his/her duties in the public interest." Board Policy 6115.03, Federal Awards/Funds Internal Controls – Conflict of Interest contains the following statement affirming the need to avoid potential conflict of interest in using federal grants including ESSER: "No employee, officer, or agent of the Board of Education may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest."[148]

Transportation Funding

Analysis of the October 2023 DRTRS files showed that the total value of bus routes for Lakewood Public School District was $43,900,195.14. Average expenditure per student based on that figure ($43,900,195.14 divided by 40,958 students) is $1,071.83, including IEP-required transportation and AIL. Looking at the Lakewood Annual Comprehensive Financial Report (ACFR) it is difficult to find specific transportation expenditure figures that tie to that total. Furthermore, there are some routes listed in the routes file with dollar amounts but no students. This in itself does not indicate that Lakewood is being charged for empty or non-running buses; more exploration and analysis would be needed.

Table 53 displays the Lakewood expenditures that are directly attributed to transportation in the last several ACFRs. Other transportation-related expenses may be classified in categories other than transportation or not included in the Lakewood ACFR, depending on expenditure coding and accounting practices.

TABLE 53: TRANSPORTATION EXPENSES PER ACFR, LAKEWOOD PUBLIC SCHOOL DISTRICT

Fiscal year ending	Expenditures, Pupil Transportation
2022	$5,184,538
2021	$34,719,706
2020	$32,555,800
2019	$32,808,113
2018	$30,799,400
2017	$28,797,644
2016	$27,156,552
2015	$23,931,396
2014	$22,590,184
2013	$20,312,121

[147] *Contracting student transportation services.* (2014). New Jersey Department of Education. Retrieved from https://www.nj.gov/education/finance/transportation/contracts/contracting.pdf
[148] *Lakewood board of education.* (n.d.). https://www.straussesmay.com/seportal/Public/districtpolicyTOC.aspx?id=69d917eec73348b88ae66af620e165e5
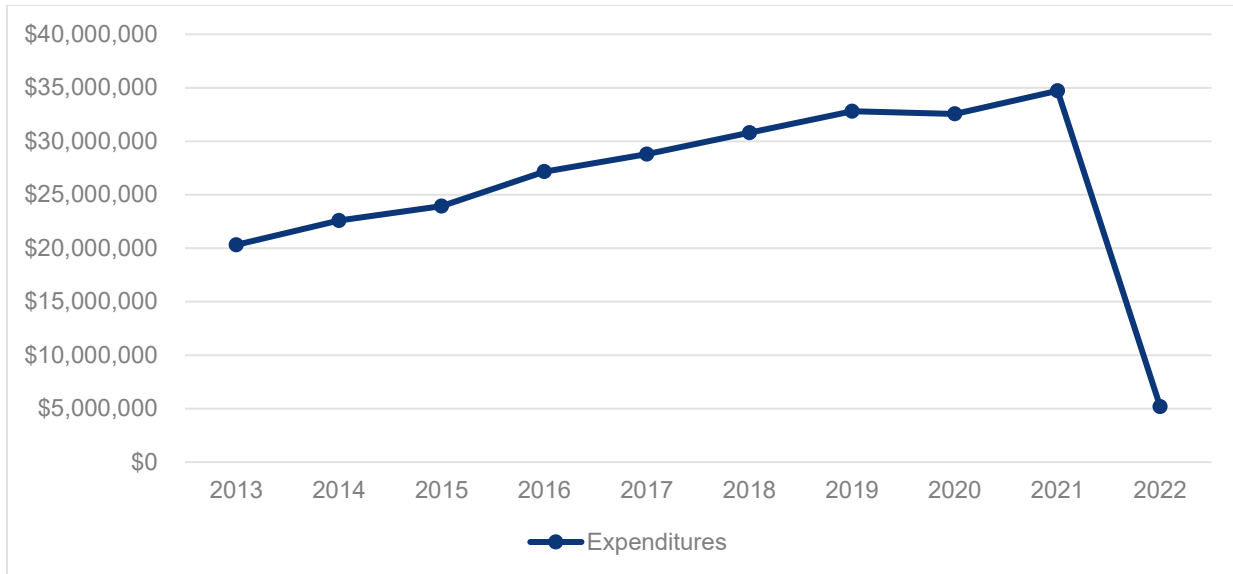
Several state funding sources specifically for education were listed in the 2022 ACFR.

- State Categorical Aid $3,052,174
- Nonpublic Transportation Aid $1,500,000
- Chapter 192 Auxiliary Transportation Aid $428,642

Municipal Transportation Aid of $1.2 million was also noted in the 2022 ACFR. The balance of funding for transportation is likely to be local tax revenue or federal funds. The preliminary FY 2023 budget earmarked $14,043,275 of ARP-ESSER III funds for nonpublic transportation.[149] PCG is not able to determine if ESSER III was actually spent on nonpublic transportation or if prior expenditures had been recoded to ESSER III.

Lakewood Student Transportation Authority Funding
Funding for the LSTA comes from three major sources, The first is an agreement with Lakewood Public School District to provide transportation or aid in lieu for approximately 25,000 nonpublic school students at the maximum AIL rate per student. For FY 2022, this amount was $24,740,600. The next largest is fees paid by families for courtesy transportation designed to fill the buses. LSTA charged $260 per student for the approximately 10,000 students receiving this service. For FY 2022, the total revenue to the LSTA from families paying for in-district and out-of-district transportation was $2,513,364. The third and final revenue stream is a payment from the town to help ensure that nonpublic school students get seats on a bus. For FY 2022, this amount was $1,203,100. Total revenue for the LSTA (FY 2022) was $27,253,964.

The LSTA's expenses totaled $30,813,857 for FY 2022. Program expenses included $28,817,333 for contracted bus services and $869,994 for aid in lieu payments. The LSTA reported administrative expenses of $1,126,530, about 3.8% of program expenses, which is in line with what CTSAs charge (although the LSTA does not explicitly charge an administrative fee in the same way that CTSAs do). One concern is that the LSTA appears to be running at a loss each year and has a growing amount of receivables at the end

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[149] *2022-2023 Introduced budget presentation.* (2022, March 23). https://www.lakewoodpiners.org/cms/lib/NJ01001845/Centricity/Domain/4/2022-23%20Introduced%20Budget%20Presentation%20FINAL%203-23-22.pdf

of each fiscal year. More exploration would be needed to determine the nature of the deficit and receivables and whether there is cause for concern.[150]

FINDINGS

PCG reports the following findings:

- There is potential co-employment of a key staff member between Lakewood Public School District and the Lakewood Student Transportation Authority
- Bid/procurement procedures and contracts appear to be done in accordance with standard practices, except for conflict of interest policy compliance
- There does not appear to be preferential treatment of certain vendors in the procurement process; route profitability analysis would be required to confirm this
- Data quality in the transportation management and reporting systems along with the User-Friendly Budgets could be improved
- Many nonpublic students do not have a student ID number in DRTRS. This presents a risk that students might be counted and funded in multiple counties
- The LSTA appears to be an innovative solution to providing transportation and meeting the local community's needs in a unique and challenging environment
- Administering programs for a large number of nonpublic students requires additional support at the district level. Much of this has been outsourced to the LSTA
- The new nonpublic transportation consortium law may impact Lakewood and LSTA if waivers for LSTA are discontinued
- The contract renewal dated August 30, 2023 between Lakewood Public School District and the Lakewood Student Transportation Authority "Disclosure of Prohibited Investment Activities in Iran, Russia and Belarus" form carries the Township of Branchburg (a New Jersey town in Somerset County) rather than Lakewood Public School District as the contracting unit. A spot-check of three RFPs on the Lakewood 2024-2025 RFPs/Bids/Proposals page revealed the same error. This could indicate a systematic lack of legal, procurement, and financial review and oversight of bid documents
- Net position and expenditure data for transportation reported in Lakewood's latest available ACFR went down by roughly $30 million from FY 2021 to FY 2022. This indicates a major change in funding source, accounting practices, or other issues to explore further

Further observations may have an impact on provision of a "thorough and efficient" education for Lakewood students:

- There may have been inappropriate use of $14,043,275 of ARP-ESSER III funds for nonpublic transportation versus for learning initiatives
- There are potential opportunities to lower prices by bidding tiered routes as packages rather than individually. Some buses are running four to eight routes a day at a total cost of over $200,000 per bus
- The LSTA enabling statute requires that unused funds be returned to the district. If funds are allocated to salary in lieu of being returned, these funds could have been used for instruction or to partially offset the district's advance loan debt
- The town has contributed millions to the LSTA for courtesy transportation while not maximizing the potential school tax rates every year

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[150] *Lakewood Student Transportation Authority LLC.* (n.d.). Propublica.
https://projects.propublica.org/nonprofits/organizations/813531813

APPENDIX

A. STAKEHOLDER ENGAGEMENT

Interviews held with Lakewood Public School District Stakeholders

1. Ana Faone, Central Registration Coordinator, Parent Liaison, Homeless Liaison
2. Charles DePeri, Facilities Manager
3. Jane Gulics, Non-public grants/Purchasing Specialist
4. Jason Mercer, Grants Office CPA
5. Kevin Campbell, Assistant Business Administrator
6. Dr. Laura Winters, Superintendent
7. Michael Inzelbuch, General Counsel, Board & District (virtual)
8. Ronald Fisher, State Monitor (departed Lakewood in December 2023)

Focus groups held with Lakewood Public School District Stakeholders

1. Board of Education Group 1
2. Board of Education Group 2
3. Board of Education Group 3
4. Board of Education Group 4
5. Curriculum Supervisors
6. Child Study Team Members
7. Counselors/Social Workers
8. Early Childhood School Principals
9. Elementary School Teachers
10. Families and Caregivers (Two groups, offered in Spanish & English)
11. High School Special Education Teachers
12. High School Teachers
13. In District Students
14. Instructional Coaches
15. Middle School Special Education Teachers
16. Middle School Teachers
17. Middle/High School Assistant Principals
18. Middle/High School Principals
19. PreK/Elementary Special Education Teachers
20. Related Service Providers (SLP, OT, PT)
21. School Nurses
22. School Support Staff
23. Special Education Middle and High School Paraeducators
24. Special Education Supervisors
25. Transportation Department
26. Union Leadership

Virtual follow-up conversations with Lakewood Public School District Stakeholders

1. Abe Krawiec, LSTA Director
2. Adina Weisz, Supervisor of Related Services
3. Amy Bearden, Transportation Manager
4. Devorie Stareshefsky, Supervisor of Special Education
5. Dr. Laura Winters, Superintendent
6. Michelle DiPietro, Supervisor of Child Study Teams

7. Ronald Fisher, State Monitor (departed Lakewood in December 2023)
8. Robert Finger, State Monitor (arrived in Lakewood January 2024)
9. Susan Naples, Ocean County Special Education Specialist
10. Tracy Paolantonio, Supervisor of ESL/Bilingual Services

Financial Controls Walkthrough Participants

1. Agnese Bratolli, Accounting Manager
2. Diane Piasentini, Purchasing Manager
3. Jane Gulics, Non-public grants/Purchasing Specialist
4. Jason Mercer, Grants Office CPA
5. Jim Trischitta, Supervisor of Technology & Security Grants
6. Kari Vashey, Human Resource Manager
7. Kevin Campbell, Assistant Business Admin

B. DATA AND DOCUMENTATION RECEIVED

Received from Lakewood Public School District

1. AP Course Offerings
2. AP Student Assessment Data
3. AP Student Demographics
4. AP Master File
5. Application List
6. Annual Comprehensive Financial Report (2022) (ACFR) and the roll up from the trial balance to the ACFR
7. Budget information for curricular materials
8. 2023-2024 Case Managers
9. Coordination and Supervision
10. Count of Self-Contained Classrooms
11. Controls Inventories
12. Class Size for Elementary, Middle and HS ELA, Math, and Science Courses
13. Curriculum map and/or pacing guide ELA/Reading, Math and Social Studies K-12
14. Curriculum adoption process
15. Curriculum Improvement Plans or Action Plans
16. Curriculum Supervisor Job Descriptions
17. District program and Outcome Data
18. Employee Master File
19. Enrollment Numbers as of January 29, 2024
20. Facilities Reports
21. FTEs for Elementary, Middle and High School
22. Financial Policy Manuals
23. FSP Controls Evidence
24. GOV Controls Evidence
25. General Ledgers
26. High School Schedule
27. HR Controls Evidence
28. 23-24 Hazardous Streets
29. IEP Student Files
30. Improvement planning
31. Instruction aligned with core standards & curriculum
32. Instructional Support
33. Interventions for Students with IEPs
34. Instructional resources ELA/Reading, Math and Social Studies K-12

35. Litigation and Settlement Decisions (Monetary) over the past five years
36. Lesson plan samples ELA/Reading, Math and Social Studies K-12
37. Lakewood ML Totals by School and Grade Level
38. Lakewood State Monitor Letter
39. Monitoring Performance
40. Multi-tiered System of Supports (MTSS) Manual
41. Middle and High School Course Offerings
42. MTSS-Lakewood School District
43. NJSMART Data Extract for SY21-SY23 (October 15th Snapshot) – student and staff data
44. Number of students in each High School Class
45. Number of teachers non-renewed over the past five years at each school
46. Organization Chart
47. Online resources provided by textbook Vendor
48. Other curriculum reviews
49. Paraprofessional Allocation
50. Paraprofessional Determination of Need
51. Paraprofessional Evaluation
52. Paraprofessional Types
53. Principal Job Descriptions
54. Professional development (PD)
55. Pre-Approved Textbook List
56. Percent time in Gen Ed Report
57. PTP Controls Evidence
58. Referrals
59. School Board Meeting Recordings
60. Special Education Accountability
61. Special Education Data Reports
62. Special Education Due Process
63. Special Education Fiscal Expenditures
64. Special Education High-Cost Areas
65. Special Education Parents
66. Special Education Student Census
67. Special education teachers' evaluation
68. Students Educated in General Education Classes
69. Student text(s) names for ELA/Reading, Math and Science
70. School Maps with Room Designation of Usage
71. Student text(s) names for ELA/Reading, Math and Science
72. Staff Grievances (Levels 2-4 in accordance with the CBA) over the past five years
73. Suspension rates
74. Teacher text and supplemental material for ELA/Reading, Math, and Science
75. Trade books or other texts
76. Textbook cycles
77. Training or PD provided to support textbook and/or curriculum adoption
78. Trial Balances for each of the last 5 years, broken out by sub-accounts
79. Unit-level plans/modules ELA/Reading, Math and Social Studies K-12

Data Received from New Jersey Department of Education

1. AP Performance Reports
2. Compensatory Education Reviews disproportionality data
3. CRRSSA Funding Report
4. DRTRS Records
5. IDEA Grant Applications

6. IEP Student Files
7. IEP selection for Compensatory reviews
8. Letter explaining identification of significant disproportionality
9. List of engagement in trainings/programs that Lakewood has been involved in
10. Prior School Year Student Level Discipline Referral and Suspension Data - All Students With and Without IEPs
11. QSAC curriculum review
12. QSAC Reports
13. Ratio requirements for school personnel
14. Settlement agreements

Data Received from "Everyone Alcantara" Listserv

The following documents were received by PCG from everyonealcantara@lakewoodpiners.org; on behalf of Michael Inzelbuch (michael@pinersprideisback.com).

Document Name	Document Description
2017-2023 Alcantara Data March 25 2023	Includes: Chronic absenteeism, NJSLA ELA, NJSLA Math, Resignations and Termination numbers, average salaries, SAT scores, QSAC ratings, preschool teacher salaries, preschool improvements, list of foreign languages offered, aggregated vocational student data
2021-2024 LAA Contract signed with board resolution (FINAL)	Formal resolution between Lakewood Public Schools and the Lakewood Board of education concerning terms and conditions of employment
2023 - 2024 Bilingual ESL Data	Bilingual/ESL Data
2023-2024 After School Clubs	PDF containing afterschool clubs 23-24
2023-2024 After School Clubs, Activities & Sports	Sports: High school fall sports, winters sports, spring sports, gold team - coed new, middle school fall sports, middle school winter sports, middle school spring sports, clubs & activities.
2023-2024 CTE Programs at LHS	Career and Technical Education at LHS
2023-2024 CTE Programs at LHS	List of CTE programs
2023-2024 Lakewood Public District Goals	Lakewood School District's Goals for the 2023-2024 School Year (English)
2023-2024 Lakewood Public District Goals	Lakewood School District's Goals for the 2023-2024 School Year (Spanish)
2023-2024 Textbook, Inventory, Kindergarten - Grade 12	Textbook inventory (K-6, Grades 7-12)
ACLU/NJDOE Lawsuit - Email #3-Alcantara	Email content: Info regarding the ACLU/NJDOE lawsuit from 2005 - serves as the basis of the Districts position that B.Gantwek not be involved
After School Clubs/Sports	Email regarding afterschool clubs clarification
Alcantara - Fernanda's Story	Email content: intro to Fernandas story (student with hearing loss)

Alcantara on AP Classes	In her Alcantara Decision, Judge Scarola made incorrect statements regarding the education of 3-year-old preschool students, the availability of vocational programs, the teaching of languages other than Spanish (including Latin and ASL), and the provision of AP classes.
Alcantara Review Email #2	Info on tasks discussed during call
Bilingual Manual	Bilingual Program Handbook
Board Attorney Video - April 2021	Video: The Lakewood School District is advocating for increased funding while highlighting their commitment to delivering a comprehensive education to all students, substantiated by audit recommendations and demonstrable improvements in educational outcomes.
Booklet_8.17_Print.PDF_Lakewood School District	Overview of school personnel, buildings in District, high level programs offered
Career and Technical Education (CTE) Numbers @ LHS	Number of students enrolled in various vocational programs for the 2023-2024 school year
Commissioner Allen - McMillan - Charter School Review	Dr. Laura Winters requesting a comprehensive of the Ocean Academy Charter School Located in Lakewood to actin commissioner, department of education
CORRECTED DROPOUT RATES and GRADUATION RATES	Graduation and dropout rates 2016-2023
Data for Alcantara - March 27, 2023 "Meet and Greet"	Email content: "As we feel very strongly that we are on a positive trajectory offering a 'T&E' based on the totality of factors we are presented with , other than an important factor , lack of stability to teachers, students, and the community due to always being dependent on possible loans, I present this data/documentation/video for your review."
December Crash Report	Traffic Incidents in Lakewood
Fernanda's Story	The video shared is about Fernanda, a bright student with hearing loss who made excellent progress during the ESY 2023 program with the help of her case manager and a team of teachers and specialists, and she will continue to receive support from a TOD throughout the school year despite recommendations for out-of-District programs.
FULLY EXECUTED SETTLEMENT.pdf	Settlement agreement: OSEP to withdraw its petition of appeal filed with the commissioner of education.
FW_Lakewood District Funding	Email from Michael in response to an email sent to Dr. Winters by The star-Ledger
Fwd_Information Requested	Email with summary of communication with parents and social workers assigned to buildings
Hispanic Heritage Month Recap	video demonstrating Hispanic heritage month

Instant Decision Days	Students make decisions about college acceptance in a video
LAA Contractual Increases 2021-2024	Approved percent increase for 2021-2024 with capped sick and personal leave payout caps listed
Lakewood - Expiring CEIS Release.pdf	Details on released IDEA Funds by Lakewood provided by DOE - saved in DOE Data folder.
Lakewood 2023 Year in Review	Review of the year video
Lakewood crashes rise 69% in 20 years	Lakewood crashes rise 69% in 20 years; here are the changes planned (app.com)
Lakewood DPR 22-23	NJ Single Accountability Continuum - District Performance Review (District information and score summary) Years 2022-2023
Lakewood Reconsideration Determination	Information regarding the districts reconsideration request and subsequent placement on the NJ Quality Single Accountability Continuum (NJQSAC)- District is considering appealing the instruction score.
Lakewood Reconsideration	Lakewood Township School District reconsideration request on the placement of the District on the New Jersey Quality Single Accountability Continuum, in areas of instruction and program, fiscal management, governance operation and personnel.
Lakewood School District Data - Data-As Per NJDOE Performance Reports	Data table of enrollment percentage by subgroup
Lakewood State Monitor Letter	Letter announcing new state monitor assigned to Lakewood
Latino Family Literacy at OCC	Latino Family Literacy Project
LEA & LAA Contracts	Email including contractual increases for 2021-2026
LEA Contract 2021-2026 Final	Agreement between the Lakewood Education Association NEA/NJEA/OCCEA/LEA and the Board of Education of Lakewood NJ
LEA Contract Notes for the 2021-2026 Contract - Approved November 17, 2023	Letter announcing successful negotiations for salary guides between Lakewood and the union.
Letter to Barbara Gantwerk 12-8-05	Lakewood Board of Education letter
LHS Marching Band Playing at Rutgers	Photo
LHS Program of Studies 23-24 LW	Program of studies Handbook 2023-2024
LMS After School Interventions	After school academic clubs offered at LMS
LTSA waiver approval FY24 Final	Approval from NJ DOE to continue with transportation contracting for 2023-2024 school year

Mel Wynns School Funding Flaws	The severe funding formula flaws that have been affecting the Lakewood School District and similar Districts with regard to property wealth and income calculations, as well as funding for special education programs, are causing significant challenges, with the potential for state intervention and loans in the future.
NJSLA - District 2022 v 2023	Standardized testing results
NJSLA - Final Results by District and SCHOOL Sept 3, 2023	Standardized test results: by District wide results
NJSLA-District 2022 v 2023	Standardized test results: NJSLA Scores 2022 v 2023. by School.
Oct22_ASSA_2520	District tuition + ASSA report
PCG Letter	Requested information about consultants/employees involved in the Lakewood Report, asked for a list of New Jersey Districts PCG has issued reports for, and requested the removal of Barbara Gantwerk from involvement in the Comprehensive Review
PCG onsite Coordination	Staff members that were randomized assigned have resigned: Andrea Palermo, Gabrielle Lafer, Kelly Myron
Petition 7-28-06	Board of Education of the Township of Lakewood Ocean County v. Office of Special Education, Division of Student Services New Jersey Department of Education
Petition	Lakewood Board of Education Petitioner v. New Jersey Department of Education, Special Ed programs respondent
Pictures of College Center at Lakewood High School	Picture of college center at Lakewood High School
Pictures of FAFSA Night - Jan 17th	Pictures of Financial Aid Night
Post Secondary data 2024	Post secondary information (College rep visits, name of universities/college/ number of students, other events)
Program of Studies Handbook 2023-2024	High School course offerings (including AP)
QSAC 2014 to 2023 LW	New Jersey Quality Single Accountability Continuum (NJQSAC) Review
QSAC 2014 to 2023	Email content referring to the QSAC scores in 2014-2023
Resignations	Email listing the number of staff resignations from 2018-2023
Salary Data as of October 18, 2023	Email content: Average salary of certified staff ($71,343.53) & Paraprofessionals ($27,400.30)
Smoking Gun - Barbara Gantwerk Email 5-17-05	Gantwerk email: Lakewood Special Education Figures
Special Ed Vocational Programs	Email content: "Deidre Llach would be a great person to talk to regarding Lakewood High School's Vocational Visions Program. DLlach@lakewoodpiners.org"

State Report 5-24-06	Review of referrals of students to special education programs in the Lakewood school District
Sue Gamm Document Lakewood Special Ed Funding Report	NJ School Funding Impact on Lakewood Public Schools: Focus on special Ed. Discusses: Overview of NJ's school funding framework, unique nature of Lakewood, NJs school funding framework disproportionately and adversely impacts LSD, NJ's special ed funding designed is not aligned with Lakewood.
Sue Gamm Report 7-30-06	Preliminary Report of New Jersey Department of Education Findings
Summer Program 2023, May 15, 2023.pdf	Summer Program Catalog
Vocational Visions Program - LHS Presentation	Presentation on LHS - purpose is to enhance and develop the talents and strengths of students with disabilities.
White Paper from Legislative Auditors	School District funding for review, issues were based on recent forensic audit of a school District.

C. PARTICIPATION IN STATE-SPONSORED PROFESSIONAL LEARNING

The New Jersey Department of Education offers professional learning throughout the year to LEAs. The below table lists all Lakewood staff participation in state-sponsored professional learning. Lakewood staff registered to attend 105 course events between February 2021 to November 2023. There were a total of 195 staff registrations across the course events. Registration counts ranged from 1 staff member in most cases to 20 staff at the highest end.

Event Title	Date Held	Attendee Count
ESL Schedules During Remote and Hybrid Instruction	2/17/2021	1
Drilling Guidance for Schools February 2021	1/25/2021	3
Deaf Education Roundtable for Speech-Language Pathologists/Specialists	4/19/2021	1
Perkins Amendment Technical Assistance Webinar FY21	2/22/2021	1
SY21-22 State Seal of Biliteracy Information and Updates Previously Participating Districts	12/1/2021	1
Drilling Guidance for Schools March 2021	2/26/2021	3
NJDOE Third Annual Early Learning Virtual Conference (Social Emotional Learning Session)	3/24/2021	1
NJDOE Third Annual Early Learning Virtual Conference (Foster Parent Partners Session)	3/24/2021	1
NJDOE Third Annual Early Learning Virtual Conference (Math Work Stations Session)	3/24/2021	1
NJDOE Third Annual Early Learning Virtual Conference (Power of Inclusion Session)	3/24/2021	2
Perkins V FY 2022 Introduction Technical Assistance Webinar	3/18/2021	1
Perkins V FY 2022 Introduction Technical Assistance Webinar	3/19/2021	1
Leveraging High-quality Science Resources	5/11/2021	1
CRRSA Act/ESSER II Technical Assistance Session	4/9/2021	1
Adapting Science Curricula	4/13/2021	1

Instructional Models that Support Accelerated Learning in Science	6/8/2021	1
CRRSA Act/ESSER II Technical Assistance Session	4/6/2021	1
Drilling Guidance for Schools April 2021	3/31/2021	2
Bridge Year Liaison Webinar	5/7/2021	2
Drilling Guidance for Schools May 2021	5/4/2021	1
Drilling Guidance for Schools June 2021	5/27/2021	3
Celebrating Our School Communities as the 2020-2021 School Year Comes to a Close	6/3/2021	2
SY21-22 WIDA: Nurturing Speaking Growth (Nov. Live Webinar Dates)	11/3/2021	1
SY21-22 WIDA: Learning through 2 Languages for School Leaders (15 weeks)	1/10/2022	1
SY21-22 NJDOE Three Year Plan Content & Forms Training (P.M.)	11/8/2021	1
2021-2022 DREAMS Program Orientation-By Invitation Only	8/26/2021	1
Dare to Dream Student Leadership Conference	10/8/2021	2
Presentation for Professionals Serving Students who are Deaf or Hard of Hearing	10/6/2021	3
Deaf Education Administrator's Roundtable	10/19/2021	2
Preparing for FY23 Perkins V CLNA: Through the Lens of Equity (CENRAL REGION Part 1)	5/18/2022	1
Dare to Dream Student Leadership Conference	10/15/2021	1
Conducting Child Study Team Evaluations for Students who are Deaf or Hard of Hearing	10/18/2021	9
Conducting Child Study Team Evaluations for Students who are Deaf or Hard of Hearing	12/9/2021	5
Fire and Security Drilling Guidance for Schools	9/10/2021	4
American Rescue Plan Elementary and Secondary School Emergency Relief	10/26/2021	1
SY21-22 Experienced Bilingual/ESL/ELS Supervisors (P.M.)	12/15/2021	1
American Rescue Plan Elementary and Secondary School Emergency Relief	11/9/2021	1
ARP ESSER Round Table Series - Summer Learning/Afterschool Programs/Grant Deadlines	6/15/2022	1
Structuring Gifted and Talented Professional Development for Educators	1/20/2022	1
SY21-22 Charter School Bilingual/ESL/ELS Supervisors and Coordinators Training	3/9/2022	1
Conducting Child Study Team Evaluations for Students who are Deaf or Hard of Hearing	3/29/2022	2
Elementary and Secondary School Emergency Relief (ESSER) Performance Report	3/2/2022	2
An Intro to Creating Trauma-Informed Learning Environments	4/5/2022	3
School Safety and Security Webinar	3/3/2022	1
CANCELED ELL Topics: Bilingual Programs in N.J. & Parents Rights Bilingual Policy	4/25/2022	1
Innovative Use of Federal Funds	5/26/2022	1
ESEA Title Programs: Purposes and Uses of Funds	5/5/2022	3
DAEF Grant FY23 Original Application Technical Assistance Session	6/2/2022	1
School Security and Safety Seminar - Ocean County	8/17/2022	5
Leveraging PLCs to Accelerate Learning (Cohort 2)	9/20/2022	1

New Preschool Instructional Coach Seminar-Central Region	10/20/2022	1
FY22 ESEA Final Expenditure Report Technical Assistance	9/21/2022	1
Virtual Roundtable for Professionals Serving Students who are Deaf or Hard of Hearing	10/24/2022	4
Virtual Roundtable for Professionals Serving Students who are Deaf or Hard of Hearing	11/1/2022	1
Virtual Roundtable for Professionals Serving Students who are Deaf or Hard of Hearing	11/3/2022	3
Mental Health Webinar Series: Session 3	10/19/2022	1
2022-2023 Regional Preschool Administrator Meeting- North	10/27/2022	2
McKinney-Vento Roundtable, October 11, 2022 ~ 10:30 am - 12:00 pm	10/11/2022	1
New Preschool Community Parent Involvement Specialists in State Funded Preschool Programs	10/27/2022	1
2022-2023 Regional Preschool Administrator Meeting-Central-Session #2	11/30/2022	1
SY22-23 Experienced Bilingual/ESL/ELS Supervisors and Coordinators Training	11/30/2022	2
SY22-23 ELL Topics: Bilingual Programs in N.J. & Parents Rights (Part 1 of 2 Series)	11/15/2022	1
Mental Health Webinar Series: Session 4	11/16/2022	1
Bilingual Programs in N.J. & Parent Rights Part 2	2/7/2023	1
Positive School Climate for Students Experiencing Homelessness	12/6/2022	1
Preschool in a Mixed Delivery System- Session #2	12/9/2022	1
Seal of Biliteracy 2022-2023 Updates	12/7/2022	1
Sheltered Instruction Training of Trainers	3/28/2023	1
2022-2023 Regional Preschool Administrator Meeting (Session #3): Central	2/2/2023	1
Elementary and Secondary School Emergency Relief (ESSER) Performance Report	3/17/2023	1
Responding to School Bomb Threats	3/16/2023	1
Strategies for Safe, Supportive, and Healthy Schools Using Title IV, Part A Funds	3/15/2023	3
Using ARP-HCY Funds to Meet Student Needs	3/6/2023	1
2022-2023 Regional Preschool Administrator Meeting (Session #4): Central (Howell)	5/9/2023	1
Responding to School Bomb Threats	3/31/2023	1
State Board of Education Central Regional Public Testimony Hearing - May 3, 2023	5/3/2023	1
Understanding the "NEW" LEA Homeless Data Tools and Resources - Region III	4/19/2023	1
Veteran Instructional Coach Meeting	5/3/2023	2
Matching Students to Employment Sites to improve Work-Based Learning Experiences for SWD	7/20/2023	1
Utilizing the Inclusive Classroom Profile (ICP) in the Preschool Classroom	8/10/2023	2
School Psychological Evaluations for Students who are Deaf or Hard of Hearing	8/16/2023	1
Introduction to the FY 2024 Perkins Application	5/11/2023	1
Understanding the Purposes and Uses of ESSA Funding	5/16/2023	2
Understanding the Purposes and Uses of ESSA Funding	5/23/2023	6
FY24 ESEA Original Application Technical Assistance	6/7/2023	1

Sustainability - Looking Beyond American Rescue Plan Homeless Children and Youth Program	6/6/2023	1
Cohort 3 Preschool Child Outcome Summary (COS)	9/20/2023	3
Standards for School Searches - Virtual Presentation	7/24/2023	20
New Jersey Learning Acceleration Program: High-Impact Tutoring Grant	8/11/2023	3
Chapter 9C and Professional Learning Guidance: 2023-2024 and Beyond	8/24/2023	1
Chapter 15 Bilingual Education Code	9/19/2023	5
New and Experienced Bilingual/ESL/ELS Supervisors and Coordinators Training	11/14/2023	1
Dynamic Duo	10/3/2023	1
Exploring Strategies to Address Meta- Cognition in the Curriculum	10/5/2023	1
Part 2: Choices and Consequences: Setting Limits through Play	10/11/2023	1
Equity and Empathy: Strategies for Welcoming All Learners in Our Inclusive Classrooms	9/18/2023	1
Part 1: Using Play to Support Children's Expression and Social-Emotional Learning (SEL)	10/4/2023	1
Collaborative Meeting of the Early Mathematics Leaders Consortium across the P-3 Continuum	11/2/2023	1
Professional Learning for Math Leaders: Differentiated Math Centers across the P-3 Continuum	12/4/2023	1
Professional Learning for Math Leaders: Assessment Practices across the P-3 Continuum	2/22/2024	1
Coaching Consortium for (VETERAN) K-3 Instructional Coaches	12/1/2023	3
Seal of Biliteracy 2023-2024 Updates	10/30/2023	1
Innovation Dual Enrollment Pilot Notice of Grant Opportunity TA Session	10/18/2023	2
An Overview of the 2023 NJ Student Learning Standards for English Language Arts	11/20/2023	5
An Overview of the 2023 NJ Student Learning Standards for English Language Arts	11/28/2023	1

D. CODE LIST FOR QUALITATIVE ANALYSIS

Code List for Focus Groups and Interviews

Domain Category	Codes Used
Governance	• Communication • Leadership • Policies and Practices
Curriculum & Education	• Access to Advance Coursework • Career Planning • Curriculum Development • Curriculum Materials/Resources • Instructional Strategies • Lesson Scripts • Pacing Guides • Standards Alignment • Commitment to Students • Communication

	○ Efficacy ○ Transparency - Extracurricular Activities - Morale - Professional Development - Services for Bilingual Learners - Teacher and Leadership Dynamics
Special Education	- Family and Community Engagement ○ Access ○ Advocacy ○ Collaboration ○ Communication ○ Community Partnerships ○ Resource Center and Training - Human Capital ○ Flexible Career Pathways ○ Quality Professional Learning ○ Recruitment ○ Retention ○ Staff Wellness - High Expectations ○ Culturally Relevant Practices ○ Growth Mindset ○ Inclusivity ○ Positive Learning Environment ○ Presumed Competence ○ Student Engagement and Voice - Learning Environment and Specialized Services ○ Access to General Education Curriculum ○ Early Childhood, Transition Activities ○ Eligibility, evaluation Criteria, processes ○ IEP Development ○ Individualized Supports ○ Learning Environment ○ Positive Behavior Supports - Leadership ○ Vision and Strategic Plan ○ Collaboration ○ Shared Accountability ○ Student-centered Decision Making ○ Team Building and Morale - Systems and Structures ○ Data quality, culture, capacity ○ Equitable funding and staffing ○ Organizational Structure and Role ○ Policy, Procedure, Compliance

	o Space and Materials
Transportation	• Non-Public • Public
Finance	• Contracts • Non-Public Services • Public Services • Routes

E. SURVEY RESULTS

Lakewood Public School District Staff Survey

PCG conducted a virtual survey for school-based staff in Lakewood Public School District. Results of the survey are shared below.

1. Please select the building(s) that you work in.
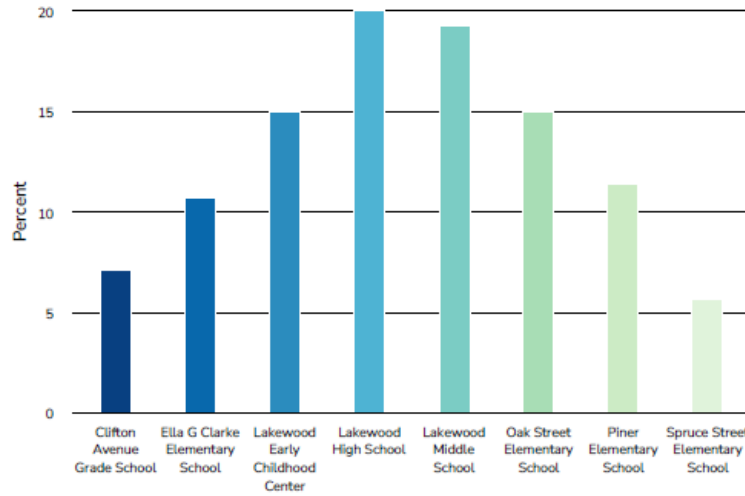
Value	Percent	Responses
Clifton Avenue Grade School	7.1%	10
Ella G Clarke Elementary School	10.7%	15
Lakewood Early Childhood Center	15.0%	21
Lakewood High School	20.0%	28
Lakewood Middle School	19.3%	27
Oak Street Elementary School	15.0%	21
Piner Elementary School	11.4%	16
Spruce Street Elementary School	5.7%	8

2. Please select your role within Lakewood Public Schools.
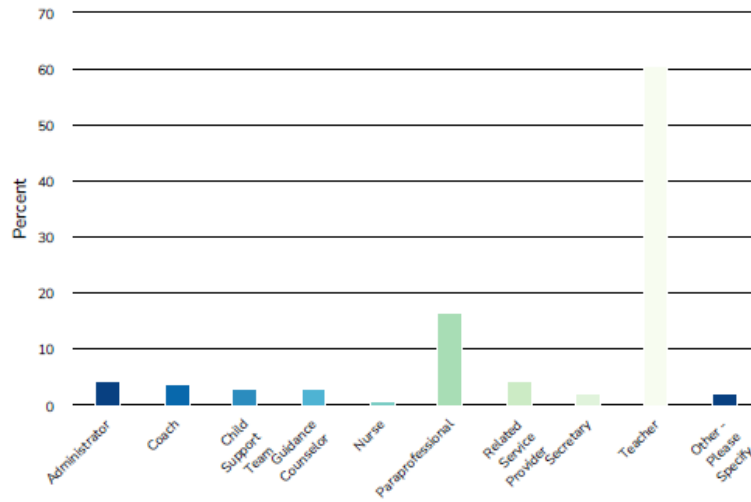
3. How long have you worked in the Lakewood Public School District?
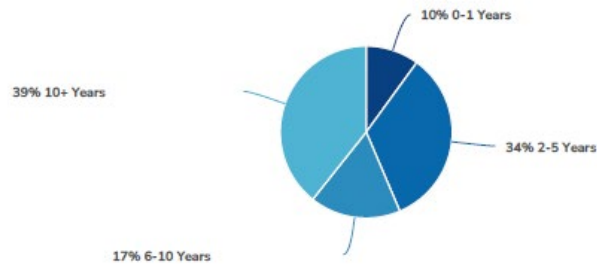
Value	Percent		Responses
0-1 Years	10.0%		14
2-5 Years	33.6%		47
6-10 Years	17.1%		24
10+ Years	39.3%		55
			Totals: 140

Ra330

4. Please indicate your level of agreement with the following statements regarding Teaching and Learning

	Agree	Disagree	I Don't Know	Responses
My school holds high expectations for every student, irrespective of their race, ethnicity, cultural background, language, sexual orientation, gender identity, economic status, disability, and religious beliefs. important issues and events. Count Row %	129 92.1%	10 7.1%	1 0.7%	140
Teachers differentiate instruction for our diverse student population needs. Count Row %	118 84.3%	16 11.4%	6 4.3%	140
Teachers provide interventions to help students succeed in core classrooms. Count Row %	124 88.6%	14 10.0%	2 1.4%	140
Teachers have collaborative relationship with families to increase opportunities for students to learn. Count Row %	103 73.6%	29 20.7%	8 5.7%	140
Teachers need to supplement content areas when designing and teaching. Count Row %	103 73.6%	16 11.4%	21 15.0%	140
There are structures and processes used to implement new programs and innovations that ensure success. Count Row %	74 52.9%	54 38.6%	12 8.6%	140
My teaching is hindered by a lack of high quality instructional materials and supplies at my school. Count Row %	49 35.0%	74 52.9%	17 12.1%	140
Teachers ensure NJ Learning Standards (NJLS) are incorporated in my lessons and treated with appropriate depth and quality required to support student learning. Count Row %	115 82.1%	10 7.1%	15 10.7%	140
Totals Total Responses				140

5. Please indicate your level of agreement with the following statements regarding Professional Development

	Agree	Disagree	I Don't Know	Responses
I have the professional development I need to implement the NJLS effectively. Count Row %	98 70.0%	24 17.1%	18 12.9%	140
I have many opportunities to attend professional development within the school day (i.e. workshops, PLCs, coaching). Count Row %	98 70.0%	38 27.1%	4 2.9%	140
Professional development opportunities offered by LPS help me to monitor student progress. Count Row %	79 56.4%	40 28.6%	21 15.0%	140
Coaching and mentoring are integral aspects of professional learning and growth at my school. Count Row %	95 67.9%	32 22.9%	13 9.3%	140
Teachers and school leaders examine data disaggregated by student groups in team-level meetings. Count Row %	99 70.7%	17 12.1%	24 17.1%	140
Teachers and school leaders participate in planned meetings to review and discuss data. Count Row %	111 79.3%	15 10.7%	14 10.0%	140
Totals Total Responses				140

Ra332

6. Please indicate your level of agreement with the following statements regarding Learning Environment and Specialized Services

	Agree	Disagree	I Don't Know	Responses
The district offers a robust continuum of services to support students with IEPs. Count Row %	83 59.3%	43 30.7%	14 10.0%	140
My school provides an inclusive environment for students with IEPs. Count Row %	111 79.3%	19 13.6%	10 7.1%	140
IEPs are implemented with fidelity (i.e., goals are time bound and relevant, present level statements that align to goals, related services that are prescribed and delivered, accommodations are consistently delivered). Count Row %	96 68.6%	28 20.0%	16 11.4%	140
Student progress toward IEP goals is analyzed and discussed (i.e., qualitative and quantitative data are collected and shared in progress reports and in IEP meetings). Count Row %	100 71.4%	14 10.0%	26 18.6%	140
Totals Total Responses				140

Ra333

7. Please indicate your level of agreement with the following statements regarding Family and Community Engagement

	Agree	Disagree	I Don't Know	Responses
The IEP process involves collaboration between building administrators, general education teachers, special educators, and parents. Count Row %	105 75.0%	17 12.1%	18 12.9%	140
Parents are given a meaningful opportunity to participate in IEP meetings. Count Row %	111 79.3%	12 8.6%	17 12.1%	140
My school effectively responds to the needs and concerns of families of students with IEPs. Count Row %	96 68.6%	24 17.1%	20 14.3%	140
Totals Total Responses				140

Ra334

8. Please indicate your level of agreement with the following statements regarding Systems, Structures, and Human Capital

	Agree	Disagree	I Don't Know	Responses
Staffing allocations are sufficient to meet the needs of students with IEPs in my school. Count Row %	66 47.1%	53 37.9%	21 15.0%	140
The central office is responsive to my school's requests for assistance with special education related issues. Count Row %	54 38.6%	35 25.0%	51 36.4%	140
There is written guidance established that defines expectations for special education service delivery. Count Row %	74 52.9%	28 20.0%	38 27.1%	140
With the knowledge I have, I feel equipped to support students with IEPs. Count Row %	104 74.3%	24 17.1%	12 8.6%	140
Totals Total Responses				140

Ra335

9. Please indicate your level of agreement with the following statements regarding Leadership and High Expectations

	Agree	Disagree	I Don't Know	Responses
Building administrators (principals, assistant principals, etc.) in my school have high expectations of students with IEPs. Count Row %	115 82.1%	11 7.9%	14 10.0%	140
School staff (teachers, related service providers, paraeducators, coaches, social workers, counselors, etc.) in my school have high expectations of students with disabilities. Count Row %	122 87.1%	9 6.4%	9 6.4%	140
There is collaboration between the Child Study Team (CST) and building leadership to implement a robust continuum of services. Count Row %	79 56.4%	30 21.4%	31 22.1%	140
Totals Total Responses				140

Ra336

Lakewood Public School District Parent & Family Survey

PCG conducted a virtual survey for school-based staff in Lakewood Public School District. Results of the survey are shared below.

1. Please select your race/ethnicity.

6% Prefer not to answer

4% Asian

6% White

6% Black or African American

79% Hispanic or Latino
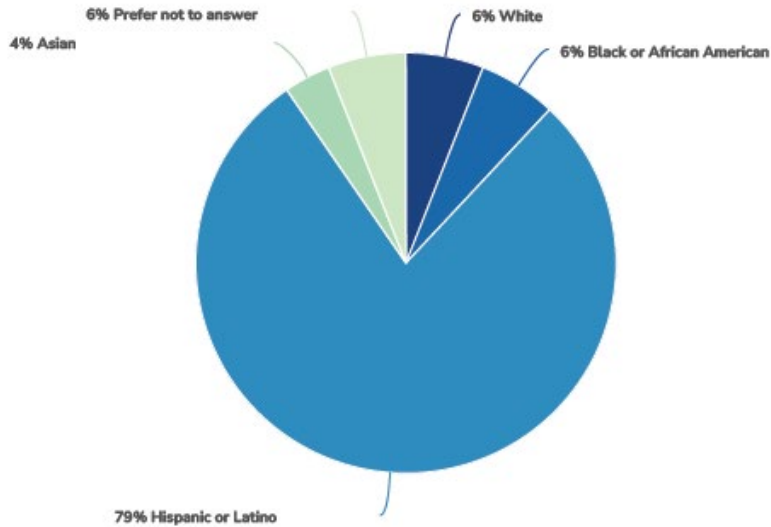
Value	Percent	Responses
White	6.0%	5
Black or African American	6.0%	5
Hispanic or Latino	78.6%	66
Asian	3.6%	3
Prefer not to answer	6.0%	5

Totals: 84

2. How long have you had a child in the Lakewood Public School system?

23% 12+ Years
33% 0-1 Years
16% 9-12 Years
12% 6-8 Years
17% 2-5 Year
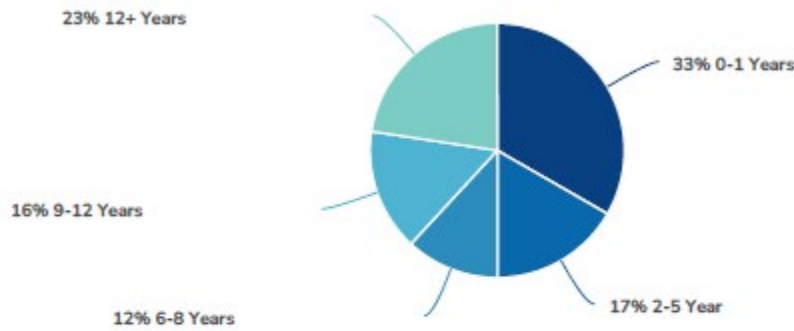
Value	Percent	Responses
0-1 Years	33.3%	28
2-5 Year	16.7%	14
6-8 Years	11.9%	10
9-12 Years	15.5%	13
12+ Years	22.6%	19

Totals: 84

Ra338

3. How many children do you have enrolled in the Lakewood Public School system?

6% 4+

8% 3

52% 1

33% 2

Value	Percent	Responses
1	52.4%	44
2	33.3%	28
3	8.3%	7
4+	6.0%	5

Totals: 84

4. Please indicate your level of agreement with the following statements regarding Communicating Effectively.

	Agree	Disagree	I Don't Know	Responses
The school(s) keeps families informed about important issues and events. Count Row %	72 85.7%	11 13.1%	1 1.2%	84
The school(s) communicates with families in their home language in multiple ways including, using e-mail, phone, or website. Count Row %	75 89.3%	9 10.7%		84
I can talk to the school principal when I need to. Count Row %	59 70.2%	16 19.0%	9 10.7%	84
My child's teacher communicates with me on a regular basis. Count Row %	70 83.3%	14 16.7%		84
It's easy to get a translator if I need one. Count Row %	63 75.0%	10 11.9%	11 13.1%	84
School staff respond to my concerns within a reasonable time. Count Row %	66 78.6%	17 20.2%	1 1.2%	84
Totals Total Responses				84

Ra340

5. Please indicate your level of agreement with the following statements regarding Supporting Student Success.

	Agree	Disagree	I Don't Know	Responses
My child's teacher keeps me well informed about how my child is doing in school. Count Row %	74 88.1%	10 11.9%		84
I understand the NJ Academic Standards my child is supposed to meet and how the curriculum is linked to those standards. Count Row %	72 85.7%	9 10.7%	3 3.6%	84
My child's teacher gives me useful information about how to improve my child's progress. Count Row %	71 84.5%	13 15.5%		84
My child is challenged to do their best. Count Row %	77 91.7%	5 6.0%	2 2.4%	84
My child's teachers are aware of his/her/their learning needs. Count Row %	76 90.5%	6 7.1%	2 2.4%	84
Totals Total Responses				84

6. Please indicate your level of agreement with the following statements regarding Advocating for my Child.

	Agree	Disagree	I Don't Know	Responses
If the school can't help me, they will connect me to someone who can. Count Row %	62 73.8%	10 11.9%	12 14.3%	84
I understand the rules and requirements for student dress, language, and behavior. Count Row %	81 96.4%	2 2.4%	1 1.2%	84
The school keeps me informed of my rights under federal and state laws and policies and helps me exercise those rights as needed. Count Row %	59 70.2%	17 20.2%	8 9.5%	84
I feel empowered to advocate for my child's in school. Count Row %	72 85.7%	6 7.1%	6 7.1%	84
Totals Total Responses				84

Ra342

7. Is your child receiving English Language Learner (ELL) services?

38% No

62% Yes
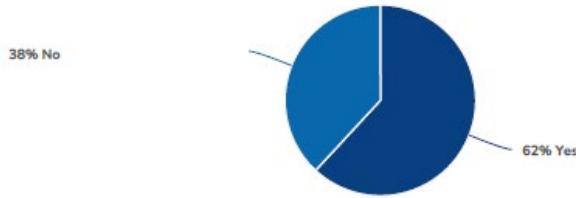
Value	Percent	Responses
Yes	61.9%	52
No	38.1%	32

Totals: 84

8. Do you have a child that requires Special Education services?

25% Yes

75% No
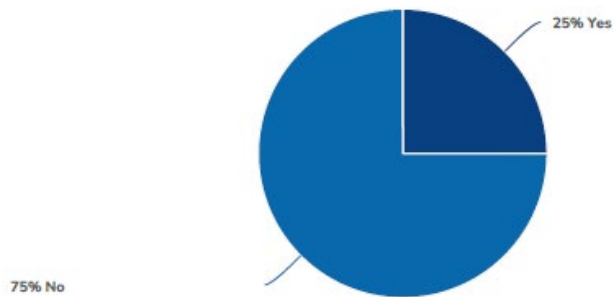
Value	Percent	Responses
Yes	25.0%	21
No	75.0%	63

Totals: 84

9. Are you satisfied with the English Language services that your child is receiving?

6% No

94% Yes
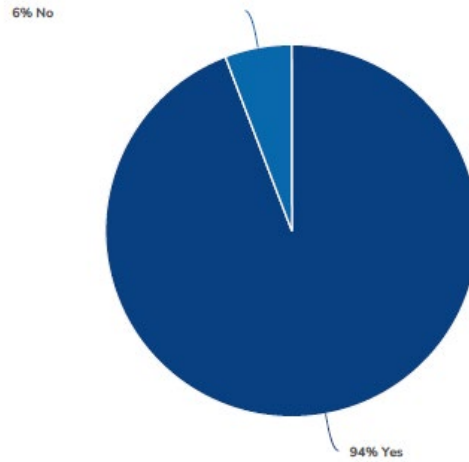
Value	Percent	Responses
Yes	94.2%	49
No	5.8%	3

Totals: 52

10. Do you require language translation services to better understand your child's educational needs?

43% No

57% Yes

Value	Percent	Responses
Yes	57.1%	12
No	42.9%	9

Totals: 21

11. Were you asked if you would like to have an interpreter in IEP meetings?

8% No

92% Yes

Value	Percent	Responses
Yes	91.7%	11
No	8.3%	1
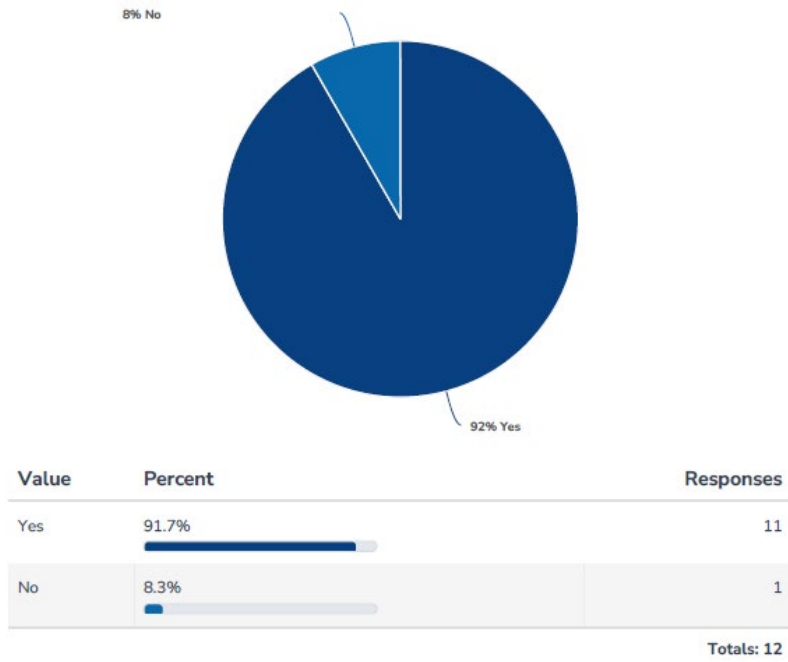
Totals: 12

12. Was in interpreter provided at IEP meetings?

8% No, and I needed an interpreter

92% Yes

Value	Percent	Responses
Yes	91.7%	11
No, and I needed an interpreter	8.3%	1

Totals: 12

Ra345
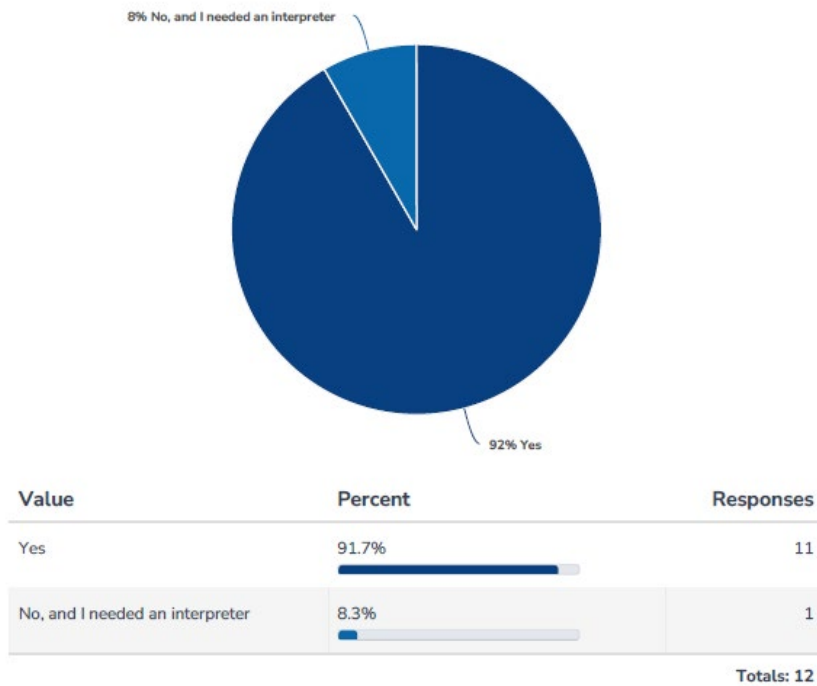
13. Did the interpretation provided at the IEP meetings help you understand the information discussed?

100% Yes
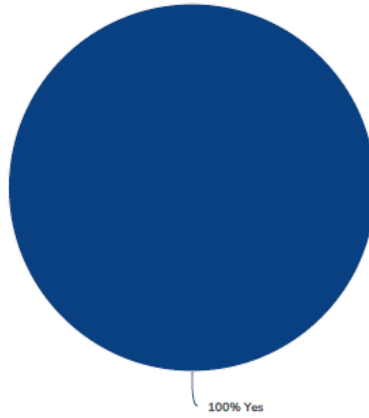
Value	Percent	Responses
Yes	100.0%	8
		Totals: 8

Ra346

14. Please indicate your level of agreement with the following statements regarding Learning Environment and Specialized Services.

	Agree	Disagree	I Don't Know	Responses
My child is receiving the special education services that best fits his/her/their needs. Count Row %	19 90.5%	2 9.5%		21
My child's school is inclusive of students with IEPs. Count Row %	19 90.5%	2 9.5%		21
At my child's most recent IEP meeting, the IEP team discuss receiving special education services in the general education class. Count Row %	19 90.5%	2 9.5%		21
My child is a valued member of the school and is generally included in all academic and extracurricular activities. Count Row %	17 81.0%	2 9.5%	2 9.5%	21
My child is getting the amount and type of services that are listed in his/her/their IEP. Count Row %	16 76.2%	2 9.5%	3 14.3%	21
My child's IEP tells how progress towards goals will be measured. Count Row %	19 90.5%	1 4.8%	1 4.8%	21
I receive reports on my child's progress towards meeting his/her IEP goals. Count Row %	17 81.0%	3 14.3%	1 4.8%	21
Totals Total Responses				21

Ra347

15. Please indicate your level of agreement with the following statements regarding Family and Community Engagement.

	Agree	Disagree	I Don't Know	Responses
I am familiar with the support offered through the Special Education Parent Advisory Group (SEPAG). Count Row %	15 71.4%	4 19.0%	2 9.5%	21
I have participated in district-led training or workshops for families of students with disabilities. Count Row %	7 33.3%	7 33.3%	7 33.3%	21
I feel comfortable asking questions at IEP meetings. Count Row %	19 90.5%	1 4.8%	1 4.8%	21
My input is considered during IEP meetings. Count Row %	18 85.7%	1 4.8%	2 9.5%	21
Totals Total Responses				21

16. Please indicate your level of agreement with the following statements regarding Systems, Structures, and Human Capital.

	Agree	Disagree	I Don't Know	Responses
There are enough staff to implement my child's IEP with consistency. Count Row %	17 81.0%	4 19.0%		21
Totals Total Responses				21

Ra348

17. Please indicate your level of agreement with the following statements regarding Leadership and High Expectations.

	Agree	Disagree	I Don't Know	Responses
Building administrators (principals, assistant principals, etc.) have high expectations of my child who has an IEP. Count Row %	17 81.0%	1 4.8%	3 14.3%	21
School staff (teachers, related service providers, paraeducators, coaches, social workers, counselors, etc.) have high expectations of my child who has an IEP. Count Row %	19 90.5%	2 9.5%		21
Totals Total Responses				21

F. GOLDEN THREAD FRAMEWORK

For a student with a disability, his or her IEP team is charged with ensuring that the evaluation supports the existence of a disability and shows a clear connection to the Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement, identified learner characteristics, least restrictive environment considerations, and selected accommodations for instruction and assessment. This logical progression through the body of evidence, known as the **Golden Thread**, should connect the pieces to tell a student's complete educational story.

Evaluation → **Present Levels** → **Goals** → **Services and Placement** → **Progress**
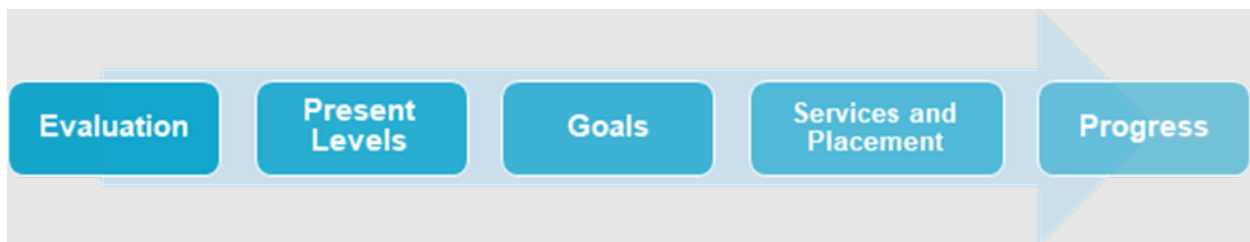
Evaluation - What are the student's characteristics as a learner? What is his/her documented disability? How do the evaluation results inform an instructional plan?

Present Levels - What is the student's present level of academic achievement and functional performance (PLAAFP)? How can access to grade-level standards be ensured regardless of the disability or language barrier?

Measurable Annual Goals - What can the child reasonably be expected to accomplish within one year? What types of instructional tasks are expected of the student to demonstrate proficiency in grade-level content? Are goals reasonably ambitious and achievable, and do they address all areas of need?

Services and Placement - What services will be provided? By whom and for how frequent? What accommodations are needed for learning in multiple settings? What services and supports are needed for

the student to progress in all identified areas? Are accommodations documented and used as a foundation for classroom instruction and assessment? Where and how will the student receive services?

Progress Reports - What data are being collected on the fidelity of IEP implementation as well as on student progress toward meeting IEP goals? Is the student making progress?

Quality Indicator Review

This Quality Indicator Review, based on the tenets of the Golden Thread Framework, focuses on areas essential to the development of quality Evaluation, IEP, and Progress Monitoring documentation. Taken together, these documents for students with disabilities provide a comprehensive view of their access, participation, and progress in the general education curriculum and address other disability needs.

The quality indicators are based on these foundational assumptions:
- Results of individual evaluations provide the information the IEP team needs to make its recommendations.
- The student's strengths and needs guide IEP development.
- The IEP team considers the interrelationship of the impact of the student's disability and the components of the IEP.
- IEP development occurs in a structured, sequential manner.
- IEPs include documentation of recommendations in a clear and specific manner so the IEP can be implemented consistent with the evaluation team's recommendations.
- Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability-related needs.
- The IEP team determines how student needs will be met in the least restrictive environment.
- The IEP team demonstrates knowledge of grade level general education curricular and behavioral expectations and benchmarks.
- IEPs are implemented with fidelity and adjusted based on student response to instruction.
- Ongoing progress monitoring and formative assessment of student progress, goals and objectives are consistently implemented.
- Revisions to the IEP are made based on data indicating changes in student needs or abilities.
- IEPs for students with disabilities developed by the evaluation team result in students access, participation and progress in the general education curriculum and address a student's other disability needs.[20]

PCG used five overarching quality indicators to assess files. The rubric included specific "look-fors," or classifications of evidence, under each indicator.

Indicator	Evidence
1. Results of individual evaluations provide the information the Evaluation Team needs to make its recommendations.	- Evaluation results are reported in a manner that provides sufficient basis for: present levels of performance (PLP); comparison to typically developing peers and grade-level expectations; unique learning characteristics and educational needs of the student; development of IEP annual goals and, as appropriate, short-term instructional objectives and benchmarks; and transition activities. - Evaluation results provide sufficient baseline information for future determination of progress in all areas of the suspected disability. - Evaluation reports are written in clear, precise, and easily understood language that is: jargon free, succinct, and provided in a language/mode of communication understood by the parent. - Evaluation reports identify the nature and extent to which the student may need environmental modifications or accommodations; human and material resources to support learning in the general education curriculum and environment. - Evaluation reports provide instructionally relevant information that provides insight into the student's learning characteristics and needs and supports development and provision of instruction likely to result in achievement of the student's IEP goals.

Ra350

	• The Evaluation Team reviews, discusses, analyzes, and evaluates the student's progress in order to address his/her unique needs related to the disability.
2. The IEP Team considers the interrelationship of the impact of the student's disability and present levels in the IEP.	• PLAAFPs establish a measurable baseline of student's abilities and needs for determining progress. • Parent input is solicited and included in the development of the IEP. • Clear, concise PLAAFP statements are written in user friendly language, and are a thorough description of student strengths and needs.
3.Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability related needs.	• Annual goals focus on the knowledge, skills, behaviors and strategies to address the student's needs. • Goals are developed in consideration of the student's need to progress toward the State standards by identifying the foundation knowledge (e.g., reading/math) necessary to meet the standards and/or the learning strategies that will help him or her to learn the curriculum content. • Targeted learning outcomes/goals are closely aligned to the general education curriculum and aligned with the age/developmental level of the class or grade level. • Annual goals define the path from the student's present level of performance to a level of performance expected by the end of the year. • IEP goals and objectives are: instructionally relevant; measurable, aligned with identified targeted needs; reasonably achieved in the period covered by the IEP; congruent with the student's ability/disability; and designed to support participation and success in the general education curriculum.
4.The IEP Team determines how student needs will be met in the least restrictive environment.	• The IEP Team uses knowledge of the continuum of appropriate academic and behavior intervention strategies for subject areas and age/developmental levels. • The IEP includes support for school personnel (professional development or technical assistance) as needed to implement the IEP. • The IEP Team considers issues of access, participation and progress in relation to each individual student's needs, including, but not limited to, consideration of: curriculum content; modifications to instructional materials; rate of learning; physical environments; demonstration of learning; instructional approaches; instructional supports; and behavioral supports. • Recommended special education program and services, accommodations, and modifications needed for student to achieve goals are discussed. • The IEP Team actively considers and recommends accommodations or modifications to instruction and/or the use of assistive technology as necessary to ensure access to the general education curriculum. • A student's performance on classroom, state, and/or and District-wide assessments is discussed, considered and documented. • Placement is the last recommendation made in consideration of the least restrictive environment in which the student's IEP can be implemented.

E. BOARD MEETING EVALUATION RUBRIC

Evaluator Name:_____

Meeting Date:_____

Effective School Board Component	Likert Scale 1-Not Present During Meeting 2-Present, but Ineffective 3- Present and Effective 4- Present and Highly Effective	Evidence
AGENDA ITEMS		
The agenda is well organized, supported by necessary documents, and provided within timeline	1 2 3 4	
Each Board member was prepared to discuss agenda items	1 2 3 4	
Only agenda items were discussed, no getting off-track	1 2 3 4	
Routine agenda items were acted upon through a consent agenda.	1 2 3 4	
The items on the agenda reflect the current needs of the system including strategic plan items.	1 2 3 4	
Board members made informed comments and asked appropriate questions regarding agenda items	1 2 3 4	

OPERATION OF MEETING		
All board members were present	Yes or No	
Agenda items were reviewed and any changes in priority were set by the board as it adopted the agenda.	1 2 3 4	
The Board Chair guided the meeting effectively and members participated responsibly.	1 2 3 4	
A diversity of opinions were expressed and issues were dealt with respectfully and collaboratively	1 2 3 4	
When issues came up in the meeting, they were thoroughly explored until everyone understood the issue.	1 2 3 4	
Each board member participated in the discussion and no one dominated the meeting time	1 2 3 4	
Whenever possible, the Board withheld definite Board action until after the superintendent's recommendation was presented.	1 2 3 4	
Before decisions were made, Board members had the opportunity to engage in discussion and		

deliberation; so that all members had full attention paid to their point of view.	1 2 3 4	
Closure on each agenda item was obtained before the Board moved to the next item.	1 2 3 4	
The Board guarded against spending meeting time with administrative details; time and energy were used for important governance issues; policy-making, and planning	1 2 3 4	
Only agenda items were discussed, Board members did not get off-track	1 2 3 4	
When a decision was made, it was clear who should carry it out and when	1 2 3 4	
BOARD MEMBER PARTICIPATION DURING THE MEETING		
Board members strived to work closely together as a Board and avoided negative, disrespectful or derogatory comments or facial expressions to other Trustees or CCSD staff.	1 2 3 4	
All Board members were involved and attention to the business being discussed.	1 2 3 4	
Board members kept their comments or questions focused on the agenda items under discussion.	1 2 3 4	
Board members used the Board meeting time for genuine discussion and problem solving.	1 2 3 4	
The Board chair made certain all Board members had equal opportunity to present their views.	1 2 3 4	

School Board Rubric Adapted from: Tennessee School Board Association (TSBA). Meeting Management Assessment. Board of Distinction. Retrieved from: https://www.tsba.net/wp-content/uploads/2022/07/Bd_of_Dist_Mtg_Mgmt_Form.pdf.

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F. AUDIT VENDOR FINDINGS

Vendor #	Vendor #	Remit to name	Index name	Board Apprvoal	W9 and BRC	Last year of activity	Response from Lakewood	
						Testing		
1	10993	TZIPPA WEINBERGER	WEINBERGER, TZIPPA	No	No	2008/2009	There are no Pos against this vendor	
2	11235	THE PRINCETON PACKET INC.	PRINCETON PACKET INC. ,THE	No	No	2011/2012	Documents not available	
3	8133	NJASBO	NJASBO	No	Yes		Attached	
4	1542	OCEAN MENTAL HEALTH SVCS	OCEAN MENTAL HEALTH SVCS	No	Yes		Attached	
5	11468	CHANA ZIONS	ZIONS, CHANA	No	No	2012/2013	No BRC- under the threshold	W9 Not available
6	5750	BATA INC.	BATA INC.	No	Yes		Attached	
7	1137	FRANKMAN, EDWARD	FRANKMAN, EDWARD	No	No	2007/2008	No BRC- under the threshold	W9 Not available
8	10122	CHAVA GOLDING	GOLDING, CHAVA	No	No	2009/2010	No BRC- under the threshold	W9 Not available
9	8954	RACHEL COHEN	COHEN, RACHEL	No	No	2013/2014	No BRC- under the threshold	W9 Not available
10	6679	APPLAUSE THEATER & CINEMA	APPLAUSE THEATER & CINEMA	No	No	2008/2009	No BRC- under the threshold	W9 Not available
11	10541	CUSTOM COACH & LIMO, INC.	CUSTOM COACH & LIMO, INC.	No	No	2009/2010	No BRC- under the threshold	W9 Not available
12	1701	C. SANDER'S EMBLEMS, LP	C. SANDER'S EMBLEMS, LP	No	No	2008/2009	No BRC- under the threshold	W9 Not available
13	12887	SINAI SPECIAL NEEDS INSTITUTE	SINAI SPECIAL NEEDS INSTITUTE	No	Yes		Attached	
14	8177	ROCHEL ROTKIN	ROTKIN, ROCHEL	No	No	2006/2007	No BRC- under the threshold	W9 Not available
15	13434	GLENDALE PARADE	GLENDALE PARADE	No	No	2016/2017	Attached	
16	9002	INDOFF, INC	INDOFF, INC.	No	No	2007/2008	No BRC- under the threshold	W9 Not available
17	12616	ROCHEL COHEN	COHEN, ROCHEL	No	No	2014/2015	No BRC- under the threshold	W9 Not available
18	14872	GF SUPPLIES LLC	SIGO SIGNS	No	Yes		Attached	
19	9912	YURY'S BUS SERVICE	YURY'S BUS SERVICE	No	No	2008/2009	No BRC- under the threshold	W9 Not available
20	13038	TRI FURNITURE DESIGN LLC	TRI FURNITURE DESIGN LLC	No	Yes		Attached	
21	11120	FOX EQUIPMENT	FOX EQUIPMENT	No	No	2011/2012	No BRC- under the threshold	W9 Not available

Response from Lakewood

I am unsure of what you mean by "Evidence of approval for these vendors" The Board approves the Bills List so if any payments are being made
the Board approves the payment to the vendor.

Most of these vendors have not been accessed for many years. Some as much as 16 years ago. We would not have that documentation any longer.