

# CRITICAL REVIEW OF THE LAKEWOOD REVIEW AND RESPONSE TO THE NEW JERSEY DEPARTMENT OF EDUCATION

A review of the Comprehensive Review of the Lakewood Public School District and the Lakewood School District Response to the Assistant Commissioner of Education, New Jersey Department of Education

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## Purpose

The purpose of this report is to review the Comprehensive Review of the Lakewood School District, issued on March 1, 2024, submitted by Dr. Kimberley Markus to the New Jersey Department of Education. This report was commissioned by the Acting Commissioner, Allen-McMillan, on May 12, 2023. The report was conducted by a former Commissioner of the Department, Dr. Harrington. In the review, Dr. Harrington retained Public Consulting Group (PCG) to assist in the review. This report is looking into the report that the New Jersey Department of Education (NJDOE) commissioned and comparing the School District of Lakewood's Response Letter to the Assistant Commissioner of Education.

It is important when reviewing and conducting in-depth reports that information be presented in a manner that is based on the original request. In the Purpose section of the Comprehensive Review, it states that "It aims to provide a comprehensive analysis of current practices and policies across key areas." Reports that look at school districts - and especially ones that are issued by the Education Department - need to be fact-based. Additionally, when utilizing comparative information from other districts, those districts should have similar demographics and circumstances. This report will take an in-depth look at the Comprehensive Review of Lakewood Public Schools and the Response Letter from Lakewood Public Schools to the Assistant Commissioner regarding the Comprehensive Review final report and determine whether the findings are warranted.

This report will be conducted in a neutral fact-finding manner and will review the sufficient evidence from both the report and response. This report will review the findings portion of the review report, dated March 1, 2024, and determine whether or not the finding(s) have any legal merit or evidence to demonstrate a finding or a recommendation of a finding(s).

## Overview and Background

The Lakewood Public School District (LPSD) is the public school system that supports Lakewood Township. Lakewood Township has approximately 50,000 school-aged children. Approximately 5,000 students attend the Lakewood Public Schools. The majority of the 50,000 school-aged children, which is approximately 85 percent, attend private, nonpublic schools. Lakewood Township is a growing community with the majority of residents being of Orthodox Jewish religion and culture. In 2009, 59 percent of the 54,500 Lakewood residents were of Orthodox Jewish religion and culture. In 2018, 67 percent of the 90,000 Lakewood residents were of Orthodox Jewish religion and culture. The population of Lakewood Township is projected to continue to grow over the next several years.

Demographically, 8 percent of Lakewood Public School students identify as Black, 85 percent identify as Latino and 4 percent identify as white. The entire student body is eligible for free or

reduced lunch given that over 80 percent of the student population qualify for state assistance. The district also has 36 percent of its students identified as English Language Learners or Multilingual Learners.

As a result of the unique enrollment structure, Lakewood is an outlier amongst other New Jersey school districts, in which most of the students are enrolled in public schools. The non-public school students in Lakewood alone constitute nearly a quarter of all such students in the state.

On March 1, 2024, the New Jersey Department of Education (NJDOE) submitted a Comprehensive Report on the Lakewood Public School District<sup>1</sup>. After initial review, the Lakewood administration noted several factual errors and omissions in the report. The Lakewood School District then commissioned another report that would review the NJDOE report.

### **Project Goals**

- Analyze the initial comprehensive review
- Examine data and information in the Response Letter to the New Jersey Assistant Commissioner
- Conduct focus groups with teachers, administration, parents, support staff, and school board members
- Conduct on-site walk-throughs of classrooms in schools and programs
- Determine any recommendations or findings

The district sought out an educational expert to perform a review and produce a report that outlines the findings in the Comprehensive Review of the Lakewood Public School District. Elizabeth Keenan, PhD. is the consultant the district requested to perform the review report. She has 30 years in education and has held various leadership roles such as Chief Officer, Assistant Superintendent, Principal, Director of Special Education, Teacher and Superintendent. Dr. Keenan presented a neutral view of Lakewood School District because she was from Minnesota and has been a leader in Wisconsin and Illinois as well. In addition, she has an understanding of school systems and is able to determine if the review demonstrates concerns due to the unique data and can also determine if any finding is actually something that is not occurring in other districts. It is important to determine what is actually a factual finding and what may be something that many districts encounter.

<h2><b>METHODOLOGY</b></h2>
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## FOCUS GROUPS

From March 18 – March 20, 2024 the consultant conducted focus groups with multiple groups in Lakewood. There were a total of 13 focus groups conducted and 235 district staff in attendance. The stakeholders included principals, teachers, assistant principals, supervisors, finance department, security department, transportation department, support staff and students. All of the focus groups were 60 minutes in length.

The focus groups were comprised of the same individuals who participated in the PCG focus groups. The focus group questions were general questions as well as specific questions about interventions, student expectations, curriculum and curriculum writing, and walkthroughs.

## SCHOOL VISITS

The consultant was able to go to each school and visit five to six classrooms. The classroom visits were special education classrooms, bilingual classrooms, general education classrooms, co-taught classrooms and related service classrooms. Principals and supervisors were along for the classroom visits as they are the leaders of the building.

## OVERVIEW OF DISTRICT

This report will review the information in the Comprehensive Review of the Lakewood Public School District and information in the Lakewood School District Response Letter. This report will focus on the five domains of the findings from the original report, which are: Governance, Curriculum & Instruction, Special Education, Financial Practices, and Transportation information. All data referenced in this report is from the original report, NJDOE, and Lakewood School District.

Data that will be in this report will be drawn from the data in the Comprehensive Review for the Lakewood School District and the data provided in the Response Letter from the Lakewood School District. In addition, there will be comparison data from other New Jersey Districts and other districts in the United States. Finally, there will be first hand information and data from the parent and staff survey, focus groups, and on-site observations that were conducted over March 18-March 20, 2024.

## SUMMARY OF CONCLUSION

As mentioned above, the purpose and the role of a consultant(s) in evaluating any school district is to ensure that there is an impartial view and that there should be factual information in determining findings. After a deep dive into the Comprehensive Review on the Lakewood Public School District, it is very clear that the comments are based on subjective interpretation and not an understanding of schools, school boards and communities. As quoted in the report (p. 2)

*“Ultimately, this document is designed to catalyze positive change, fostering an environment where every student can thrive and achieve their fullest potential, supported by robust governance, dynamic curriculum, sound financial management and reliable transportation.”*

If this was the intent of the report, it did not stay true to the intent. The number of conflicting and subjective criticism on practices and policies are unlike any other report created. Furthermore, the criticisms are couched in “findings” that have no factual or legal merit. In the 38 findings in the Summary of Areas of Focus, all 38 were either a subjective opinion or missing facts by the author of the report.

Based on the deep dive comparisons of the Comprehensive Review and the Response Letter, there is very little evidence that leads to the conclusion of the report that there are 38 findings. It is determined in this report that the Lakewood School District is much like many districts in New Jersey and the United States Public School system. They have been performing the day-to-day governance, curriculum and instruction, special education, financial, and transportation in a manner that is serving the students and community. There are areas for improvement but in every district that is going to be the case.

There were no critical findings observed with the additional information provided in this report. The areas of governance, curriculum and instruction, special education, finance and transportation all prove to have best practices and up to date information to support the students and families of Lakewood. The Lakewood School District is a district that has systems in place that many districts do not and to the level that they have it.

Lakewood Public Schools is a unique school district. In fact, there is no other district comparable to the number of students in the district boundaries that do not attend the public school but attend the nonpublic schools in the area. It is recommended that the NJDOE, in the reporting on key areas, has an understanding of the data. NJDOE should not criticize the district for the higher number of students identified with an IEP when it should have full knowledge of the nonpublic enrollment of 50,000+ students and the public schools enrollment of 5,000 students.

Finally, there were three areas where the consultants who prepared The Comprehensive Review of the Lakewood Public School District, created findings for the district and recommended measures to correct the findings by violating IDEA. The three findings and related recommendations included the number of students in out-of-district placements, special education eligibility, and transportation. In all three areas, the consultant recommended that the

district bring students back from out-of-district placements, tighten up eligibility on nonpublic students being referred to out- of-district placements and reduce transportation through the IEP process. These three recommendations would put the district in direct violation of IDEA. The New Jersey Department of Education should nullify the report based on the direct violation of IDEA recommendations and the findings that had no factual basis.

In conclusion, it would be to the benefit of the New Jersey Department of Education to have a better understanding of the Lakewood School District in the areas of special education, finance and transportation. Because of the unique circumstances of the public student enrollment compared to the non-public student enrollment, the areas of special education, finance and transportation are all areas where the nonpublic enrollment affects the numbers in terms of identification, per pupil cost and amount of cost for transportation.

The Lakewood School District is serving the students in Lakewood in a manner that is extremely supportive and with high expectations. The students who participated in the focus group felt that the education they are receiving is one that is preparing them for life. The students believe that the Lakewood teachers support and care for them and they feel safe in the school. Most of all, the students believe that the rigorous instruction is a direct result of the philosophy of the district.

The Comprehensive Review of the Lakewood Public School District had no findings because there were no legitimate or factual citations that the New Jersey Department of Education could fault. The findings were not findings but a critical review of the district in a very subjective manner. An example is: the school board has a president and a vice president. The report stated a finding because the school board does not use chairperson and vice chair. This is a very simple example of how this is not a finding because there is no statute that requires this for any school board. This was just one example of many that provides a rationale for the report to be nullified.

The following is a thorough summary of each finding and an explanation with further data to provide proof of the inaccuracies of the claims.

**SUMMARY OF FINDINGS FROM COMPREHENSIVE REVIEW OF THE  
LAKEWOOD PUBLIC SCHOOL DISTRICT AND LAKEWOOD RESPONSE  
LETTER**

**GOVERNANCE**

In the initial Comprehensive Review of the Lakewood Public School District, the area of governance focused on policy-setting and oversight practices of the Lakewood Board of Education and leadership. The analysis below takes the findings from the Comprehensive

Review and provides documentation, observation and clarification of the suggested findings in this area. Below is a review of pages 2-4 and 7-10 of the report.

## **SCHOOL BOARD**

### **In the Comprehensive Review of the Lakewood Public School District, the findings section of the report, regarding the school board (p. 10):**

*The LPSD board meetings are conducted with a consent agenda where agenda items are voted as a package without discussion unless a board member asks for removal of an item. Included within the consent agenda are the first and second readings of policies. There are no discussions of action items, no committee reports, no discussions, and very little public comment. Most school boards in New Jersey have a Policy Committee that meets to discuss changes and updates to existing policies and drafts of new policies. These policies are given first and second readings where this is open discussion among board members about these policies and the public is given time to comment as well.*

The Lakewood Public School system has nine members on the school board. The role of the school board, according to the national school board association<sup>2</sup> include three major responsibilities: developing the annual budget; setting school policies; and hiring and evaluating the superintendent.

In the Comprehensive Review of the Lakewood Public School District, the group focused on many other areas of a school board. They did not, however, provide a sufficient rationale, nor the understanding in demonstrating their comments. The recommendations that were submitted would violate most districts' roles as a school board member by asking for "micro managing" of the district. In the report, it is asserted that the policy practices of the Lakewood Board of Education and the leadership and decision-making practices were intertwined. The assumption is an unfair assessment of how school boards function and how the role of the day to day work is a focus of the superintendent.

In reviewing the Lakewood Board of Education minutes and board meetings, the Board of Education understands what their role is in performing the leadership role for the district. The criticism in the report is not based in fact, but opinion. Every school board has their own cohesiveness. The Lakewood Board of Education utilizes BoardDocs, which is used by most districts in New Jersey. The agendas adhere to the Robert's Rules<sup>3</sup> of Order and the minutes reflect the appropriate voting. They have an identified President and Vice President, which is not uncommon to have instead of a Chair or Chairperson, which is not mandated by any organization. The school board was criticized for not making comments in the open meeting, and for not having people sign up for public comment. These comments were not backed by any violation. All school boards have a right to make comments or not. The board offers public

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<sup>2</sup> New Jersey School Boards Association, [https://www.njsba.org/wpcontent/uploads/2016/03/FAQ\\_howtobecomeaschoolboardmember-3.pdf](https://www.njsba.org/wpcontent/uploads/2016/03/FAQ_howtobecomeaschoolboardmember-3.pdf). (Retrieved March 2024)

<sup>3</sup> Robert's Rules of Order

comment, but it is not the responsibility of the board or a violation of Robert's Rules if no one shows up for Public Comment.

In the Comprehensive Review of the Lakewood Public School District, there was a finding that the School Board is not making comments to the items on the consent agenda. There are many school boards that do not make comments and approve items on consent without commenting. If a board member wants to pull an item from the consent for a separate action item, they can, but the report cannot mandate that a board or an individual on the board pull an item and have a discussion. In addition, it is not an uncommon practice for schools to approve consent agenda items without discussion. Many school boards, based on their cohesiveness, do not pull items and comment on consent agenda items. This is not a judgment of the board's efficacy but a reflection on how this particular board governs and interacts with one another.

Good boards focus their energy on governance-level actions related to the business of the school district. Successful districts are those with long tenure of board members and superintendents<sup>4</sup>. The tenure of the Lakewood School Board shows that 7 of the 9 members have been on the board for more than 5 years and 2 members have been on the board for 2 and 3 years. This demonstrates a stable school board, which is essential for school boards to be productive.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding the school board (p. 2):**

- *Board Policies. Board meeting agendas contained policy updates and new policies; however, there was no policy discussion during any of the observed meetings. There are outdated and/or ill-informed policies that directly impact student learning.*

The Lakewood School Board receives updated policies and approves them on the agenda. There is no merit to the issue of policy discussion as there is no requirement that board members comment on policies. Furthermore, the report is based on a review of three board meetings. That is not enough to determine if the board members have made comments in the past at other meetings. Regardless, there is no finding that should demand that a board be forced to make comments on items or policies if the board members do not see a purpose to comment.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding the school board (p. 3):**

- *Board Meetings. Public Board meetings practices do not align with practices of comparable districts or follow recommendations from the New Jersey School Boards Association.*

As mentioned above, the Lakewood School Board utilizes BoardDocs, which is a management software that is used to manage governance for public education school boards. The platform

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<sup>4</sup> Devarics, C and O'Brien, E (2019). *Eight Characteristics of Effective School Boards*. (Center for Public Education). National School Board Association:  
<https://www.nsba.org/-/media/NSBA/File/cpe-eight-characteristics-of-effective-school-boards-report-december-2019.pdf>

maintains the minutes and adheres to the Robert's Rules of Order. There is no merit for the finding.

In the Comprehensive Review of the Lakewood Public School District, there were comments made in regards to the school board, financial transparency, structures and systems, and board attorney.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding the school board (p. 2):**

*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.*

The Lakewood School Board reviews the annual budget in March. The latest budget was presented to the board on March 20, 2024. The board and administration are providing the necessary financial transparency by reviewing the budget annually, much like most districts. In addition, Lakewood has had a State Monitor assigned to the district and the monitor has attended all board meetings and has not expressed any concerns regarding the financial reporting to the board. No finding in this area.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding the school board (p. 3):**

*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 like a Communications Director. Lakewood's legal expenses per pupil are significantly higher than comparison districts.*

It is not an uncommon practice to have an attorney attend board meetings. In fact, it is a very common practice amongst districts that have a Board Attorney. The comment that the district's legal expenses per pupil is higher than comparison districts is also misleading. The per pupil cost for Lakewood, as mentioned in the Overview and Background of this report, is based on a student population of 5,400 public school students. However, there is a significant impact due to the 7,900 nonpublic students with IEPs who would impact the district's legal expenses. There is no merit to the above claim nor is it unusual to have the attorney utilized in communications in key matters, which is necessary and not uncommon in legal issues.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding Governance and Climate and Culture (p. 3)**

*Culture. A culture of low expectations for students was observed, and high levels of distrust between central office administration and school-based staff.*

In the district survey to staff on March 13 – March 22, 2024, 64 percent of the staff stated that they do not feel their teaching is hindered by lack of quality instructional materials and supplies, 77 percent stated they have the necessary professional development needed to implement the New Jersey Student Learning Standards, 84 percent reported that school leaders work with them and their teams to support students and discuss data.

In the survey, there was no indication that there was a culture of low expectations and that there was distrust between staff and administration. In the focus groups, conducted on March 19, and 20, there were discussions on how some things could get better, however the staff overall were stating that they stay in Lakewood because of all of the support and professional development that they receive from the district.

This is not a finding because though the original report took some feedback from staff, it was not a consistent theme. The additional survey demonstrates that staff do feel supported.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding communication (p. 3)**

*Communication. There are communication gaps from the central office administration with both internal and external stakeholders.*

The Lakewood administration team has 24 leaders on the leadership team. The team is composed of superintendent, supervisors and principals. The information that is sent out from the district office is consistent and is sent in several manners. The district is trying to be consistent in the message. Lakewood, however, is not unlike other districts in New Jersey. Communication is difficult and messaging is difficult to keep consistent. It is unfortunate that this is in the findings section. It is not a finding. It is a concern and many other districts deal with it as well.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding strategic plan (p. 3):**

*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.*

The Lakewood School District updates the district's annual goals each year in August. In reviewing plans from numerous New Jersey School Districts, all plans are written differently. Long-term goals are repeated from one year to the next as they are long-term goals - some are not achievable in one year. In the Comprehensive Review of the Lakewood Public School District, (p. 37) there was an analysis chart that was critical of the goals of the district. There was

no evidence cited in the analysis other than commentary or criticism. This was not a finding because the district has long-term goals and they are updated annually.

The Lakewood Superintendent presented District annual goals to the School Board in August 2023. With the goals 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

The Lakewood School District updates the progress on the long-term goals on an annual basis and measures successes and areas to continue to work on in the long-term goals. There is no evidence that this should be a finding when the district has goals and is measuring them on an annual basis.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding reporting structure (p. 3):**

*Reporting Structure. The organization's reporting structure does not follow typical practice, as it is designed with many administrators reporting directly to the Superintendent. The Superintendent has 24 direct reports, including all curriculum supervisors, and there is no Assistant Superintendent.*

In reviewing the report provided to the Lakewood School District, this is not a finding. This is a concerning piece of information in the report that has no legal merit. All superintendents are allowed to have their own leadership model. It should be commended that the Lakewood superintendent wants to have more connection with her direct reports. The model is not one to be added to a report.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding decision making (p. 3):**

*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.*

The reconfiguration was discussed in an open board meeting on March 22, 2023. The district immediately sent information to the staff and families on March 23, 2023. The district communicated throughout the summer and up until school started. This is not a finding.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding human resources (p. 3):**

*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.*

Again, this is not a finding. In the Comprehensive Review of the Lakewood Public School District, on page 42, it states the following:

*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.*

Clearly, the above quote is saying that the Lakewood district is above the state's retention rate and yet the author of the report cited this as a finding. There is no finding. The district has a great retention rate, especially after COVID where many districts continue to struggle with retaining staff. In addition, in the focus groups on March 18, and 19, 2024, it was reported in more than one focus group that staff know they can go to other districts but choose to stay at Lakewood because of the support, the professional development and the reflection of learning culture. This data demonstrates that staff are staying and that Lakewood's retention rate is above the state average.

The human resources practices also mentions that part of the finding is that 77 teachers have been non-renewed in the past five years. The finding is not a finding. This number represents less than 3 percent of the staff being non-renewed each year. It demonstrates that Lakewood has a culture of high expectations for all staff and students. This is aligned with the expectations of the district and the daily walkthroughs. The walkthroughs represent a continuous improvement and by having 3-5 a day in each school, creates a culture of on-going progress monitoring.

According to ERS Publications<sup>5</sup> an average of 23 percent of the teachers left their school in the 2022-23 school year. The turnover rate is higher in schools that have students in poverty. Lakewood is a district with 80 percent students in poverty and the turnover rates are significantly lower than the national averages and are above the state's retention rates. The Lakewood retention rate is 93 percent and the turnover rate is under 7 percent.

**In the Comprehensive Review of the Lakewood Public School District, the Governance section of the report, regarding morale (p. 3):**

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<sup>5</sup> ERS Publications: *Examining School-Level Teacher Turnover Trends from 2021 to 2023: A New Angle on a Pervasive Issue*. Retrieved March 2024  
<https://www.erstrategies.org/tap/teacher-turnover-trends-analysis/#:~:text=On%20average%2C%2023%25%20of%20teachers,from%20last%20year's%20turnover%20spike.>

*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.*

EdWeek Research Center survey results show that teacher morale has plummeted over the course of the pandemic. In a November survey of a nationally representative sample of 817 teachers, nearly three-quarters of teachers say their morale is lower than it was before the pandemic, and 85 percent say overall teacher morale at their school is lower now. In March 2024, just 63 percent of teachers said morale was lower.<sup>6</sup> Lakewood is not the only district dealing with low morale. The low morale, however, is not sustained throughout the district. According to the survey conducted from March 13-22, 2024, 80-90% of the staff reported feeling positively about the district and the various professional development offerings.

## **STRUCTURES AND SYSTEMS**

### **In the Findings section of the Comprehensive Review of the Lakewood Public School District, regarding financial board approvals and financial systems (p. 10):**

*In addition, board approval must happen at the time of vendor onboarding, and this does not appear to be happening in the LPSD. It appears the approval of the bill list on the consent agenda for making payment is considered the approval of the vendor. The vendor must be approved by the board before payment can be issued. In addition, Business Registration Certificates (BRC) and W-9s must be maintained for all vendors.*

*There are a series of financial systems that appear to be in place but not fully functioning. Rate changes and transfers are to be approved by the District Board of Education. The control is designed properly for this; however, there is no evidence that these approvals are taking place.*

In the Lakewood School District, Budget development is presented, as mandated and when necessary. State Monitors have attended all board meetings since April of 2014. Concerns regarding financial transparency have never been discussed or mentioned by any State Monitor, NJ Legislative Auditor, Independent Auditor, or the Ocean County Superintendent / Business Administrator on a NJQSAC review. The district presented the most recent annual review of the budget to the board on March 20, 2024.

In addition, the report detailed a list of vendors that were not board approved. All of those vendors were for contracts under the board requirement of \$45,000. The board only approves contracts above \$45,000. This is not an uncommon policy for districts.

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<sup>6</sup> Education Weekly. *As Teacher Morale Hits a New Low, Schools Look for Ways to Give Breaks, Restoration*. January 2021. Retrieved March 2024:  
<https://www.edweek.org/leadership/as-teacher-morale-hits-a-new-low-schools-look-for-ways-to-give-breaks-restoration/2021/01>

The role of the monitor that was assigned to Lakewood Public Schools since 2014..<sup>7</sup>

The State monitor shall:

- (1) oversee the fiscal management and expenditures of school district funds, including, but not limited to, budget reallocations and reductions, approvals of purchase orders, budget transfers, and payment of bills and claims;
- (2) oversee the operation and fiscal management of school district facilities, including the development and implementation of recommendations for redistricting and restructuring of schools;
- (3) ensure development and implementation of an acceptable plan to address the circumstances set forth in subsection a. of this section which resulted in the appointment of the State monitor. The plan shall include measurable benchmarks and specific activities to address the deficiencies of the school district;
- (4) oversee all district staffing, including the ability to hire, promote, and terminate employees;
- (5) have authority to override a chief school administrator's action and a vote by the board of education on any of the matters set forth in this subsection, except that all actions of the State monitor shall be subject to the education, labor, and employment laws and regulations, including the "New Jersey Employer-Employee Relations Act," P.L.1941, c.100 (C.34:13A-1 et seq.), and collective bargaining agreements entered into by the school district;
- (6) attend all meetings of the board of education, including closed sessions; and
- (7) meet with the board of education on at least a quarterly basis to discuss with the members of the board the past actions of the board which led to the appointment of the State monitor and to provide board members with education and training that address the deficiencies identified in board actions.

The Audit reports from the past ten years have improved, and the last four years have demonstrated audits with zero findings which should be commended. In addition, the New Jersey Quality Single accountability continuum (NJQSAC) demonstrates that Lakewood School District has maintained scores that show confidence in how the district is maintaining their accountability.

<b>Year</b>	<b>Number of Audit Findings</b>
2013-2014	31
2014-2015	10
2015-2016	5
2016-2017	5
2017-2018	5
2018-2019	2
2019-2020	0

<sup>7</sup> Title 18A-EDUCATION: Section 18A:7A-55-Appointment of State monitor in certain school districts; duties (2007).

2020-2021	0
2021-2022	0
2022-2023	0

**NEW JERSEY QUALITY SINGLE ACCOUNTABILITY CONTINUUM (NJQSAC)  
REVIEW**

NJQSAC AREAS	Final Scores for the 2019-2020 NJQSAC	Initial Placement Scores for 2022-2023 (11/2023)	Comments
INSTRUCTION & PROGRAM	80%	79%	<b><u>NJSLA Results</u></b> Needed less than a point to receive 80%.  <b><u>Curriculum &amp; Policy</u></b> Received 40 out of 40 available points
FISCAL MANAGEMENT	88%	100%	<b>Increase of 12 points from 2020</b>
GOVERNANCE	100%	94%	Points deducted for: Acting BA does not have a contract. The district does not have an Acting BA
OPERATIONS	91%	97%	DTRS was due on 11/15 was finalized on 11/17 as the transportation file was so large and could not be uploaded on the NJDOE side.  <b>(Public and LSTA data)</b> <b>Increase of 6 points from 2020</b>

**In the Findings section of the Comprehensive Review of the Lakewood Public School District, regarding the employee handbook (p. 10).**

*An employee handbook and code of conduct are maintained; however, there is no evidence that new staff members are signing the acknowledgement form stating that they have read and understood the handbook upon employment nor that existing employees are signing an acknowledgement form annually. Similarly, there is no evidence that new hires are receiving the required training programs including security awareness and general IT training upon onboarding and that all existing employees are completing these training annually. All new hires, once approved by the Superintendent and the Board of Education, must be reported by HR to IT to grant access. Likewise, all terminations approved by the Superintendent should be communicated to IT from HR and access revoked on their last day. There is no evidence to support that either process is happening. (p.10).*

In regards to these comments, the district does indeed review the employee handbook and has evidence of this process. The Lakewood School District starts every school year with three days of staff professional development. During the end of the summer, all staff, including new staff, are emailed the *Staff Handbook*, *Code-of-Conduct*, *Student Handbook*, the *First Three days of School Schedule*, and the district's *Safe School's Online Mandated Professional Development Schedule* for review. The district utilizes the *Safe Schools* modules to document their employees' understanding of the policies and all staff must read the *Staff Handbook* and *Student Handbook* and certify that they have read both. There is a due date posted at the beginning of each year for when the employee has to complete the mandatory online *Safe Schools* and *Staff and Student Handbooks*. This is a typical manner in how many school districts document their staff's understanding of the *Staff and Student Handbooks*.

For this to be included in the report without the consultants verifying if the information was correct demonstrates that there was a serious misrepresentation of this information. The district provided the staff roster for completion of the mandatory online *Safe Schools* and *Staff and Student Handbooks*.

## **CLIMATE AND CULTURE**

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding district-wide culture of low expectations (p. 7).**

*There is a district-wide culture of low expectations for students across the Lakewood Public School District. According to Exhibit A, "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." Hoy's work on academic optimism is also referenced. A school with high "academic optimism*

*believes that faculty can make a difference, students can learn, and achieve high levels of academic performance. Staff well-being is also an important part of district climate and culture. In the LPSD, teaching staff described a challenging environment characterized by being overloaded and a perception of understaffed conditions. Almost all teachers noted the fear of job security consequences 2 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. related to the expectation of strict adherence to the pacing guides. There is some frustration due to frequent changes and new rules which create confusion and inconsistency.*

In the staff survey sent to the staff on March 11, 2024 – March 19, 2024, 414 staff members completed the survey. Of the 497 teachers in Lakewood, 239 or 48 percent of the staff completed the survey. According to the most recent Gallup survey, 50 percent would be a good score for an educational organization's survey response. A response satisfaction score of 70-80 percent would be considered good, while anything above 90 percent would be considered exceptional.<sup>8</sup>

The March 11-19 survey revealed that 85 percent of the staff stated that they have high expectations for every student. Staff reported that 79 percent differentiate instruction for their diverse student population and 83 percent of the teachers reported providing interventions to help students succeed. 70 percent of the staff reported having a collaborative relationship with families to increase opportunities for their students to learn. These survey responses along with the staff focus group information below, demonstrates a district that does have high expectations for students and believes in the families and each other to make a difference in their students' lives.

In the staff focus groups, which were conducted March 18-March 20, 2024, all of the groups stated that they work at Lakewood Public Schools because of the students and families. There is a culture in the district amongst the staff of support for one another. The focus groups stated that they have high expectations for their students and the student focus group overwhelmingly stated that their teachers have high expectations for them as students.

It is unfortunate that a report would conclude that teachers, support staff and administration have a culture of low expectations for students across the district. This comment speaks more about the author of the report than it does about the district. The comments are unfounded, subjective, and could be considered biased. Because 85% of the students are Latino, the author of the report may be marginalizing them by stating the Lakewood staff has low expectations. It is unacceptable and is yet another example of why this report should be nullified. In addition, the survey data from the report is included and it demonstrates that both parents and staff were positive and have had positive experiences in Lakewood.

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<sup>8</sup> Gallup Survey Response Rates. Retrieved March 2024

[https://www.google.com/search?q=average+rate+of+survey+results+from+staff&rlz=1C1DIMA\\_enUS841US914&oq=average+rate+of+survey+results+from+staff&gs\\_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRigATIHCAIQIRigATIHCAMQIRigATIHCQQIRigATIHCQUQIRifBdlBCjlxNzQyajBqMTWoAgCwAgA&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=average+rate+of+survey+results+from+staff&rlz=1C1DIMA_enUS841US914&oq=average+rate+of+survey+results+from+staff&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRigATIHCAIQIRigATIHCAMQIRigATIHCQQIRigATIHCQUQIRifBdlBCjlxNzQyajBqMTWoAgCwAgA&sourceid=chrome&ie=UTF-8)

In both the student and staff focus groups, there is an acceptance that there are issues and legitimate concerns, but they are not because of a lack of expectations of students. There is no merit to the finding because there is no authority for the NJDOE to make this claim. All districts have issues, but it does not mean the educators are thinking less of their students.

## COMMUNICATION

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding communication (p. 8).**

*It appears that unclear communication is also a contributor to this feeling of confusion. One example of the breakdown in communication was the movement of hundreds of students and staff with little notice, in one instance there was only one day's notice, or explanation due to a change to the configuration of schools. Principals did not have time to notify parents or plan transition activities. Teachers were notified through an email, and maintenance and facilities staff were not notified until a week before school. This meant added hours and manpower and unanticipated costs to the budget. This example, again, demonstrates how administrative decision-making critically impacts all areas of the District. Despite these issues, teachers noted that they work collaboratively and maintain constant communication, contributing to a positive aspect of teamwork.*

The Lakewood school district started planning for the grade reconfiguration in spring of 2023. This grade reconfiguration allows for improved instructional experiences and greater alignment of resources and practices, while giving rising 6th grade students an additional year in elementary school. The reconfiguration of grade levels was recommended to the board by the superintendent in March of 2023 due to changes in student enrollment.

The Board approved the changes on March 22, 2023 (6 months prior to the implementation).

All parents/guardians were notified of the change via BOE phone text on March 23, 2023. All staff were notified via email on March 23, 2023. Texts were sent once a week during the months of April, May, and June. A letter and a *PowerPoint* in both English and Spanish was sent to all parents/guardians, students, staff and posted on the district website prior to school starting in August 2023.

The district monitored complaints from staff, students and parents. The district did not receive any complaints from parents/guardians. This again, is another unfounded finding. There are many districts across the United States that reconfigure and change boundaries. It is a very sensitive issue and there are feelings attached to it from staff and families. In this case, the district was ready to respond, however, did not receive any formal concerns and were ensuring that everyone was made aware of the changes in advance.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding communication with parents (p. 8).**

*The issues concerning clear communication do not just affect staff but parents as well. Translation services were listed as a challenge area for the District. The Enrollment Office does have parent liaisons in each building and translation apps available to parents. The website has Google translate to translate to Spanish; however, only 15% of the documents on the website are in Spanish let alone any of the other languages that are primarily spoken in the community. In addition, most of the documents on the website are PDFs which do not function with Google Translate.*

The district has 16 translators across the district in schools and at the district office. The translators support parents in teacher meetings and phone calls, IEP and evaluation meetings, parent night and activity nights. The district is very intentional to provide Spanish and Ukrainian translation support to the parents who require the translation. The district also contracts with EchoEd and Boost Lingo for further translation support if one of the 16 translators is not available.

The district also provides documents that are translated in Spanish and Ukrainian. The district translates all letters going home, menus, documents for students, and the district handbook. The district website has a translation option for individuals to translate the information on the website. *Traducir* (translation) option for language is in the right-hand corner of the website.

In the district survey provided to PCG in November of 2023, 100 percent of the parents who responded to the survey stated that they were supported when it came to translation support. This is unusually high when compared to other districts across the United States. No staff member or parent stated that the translations were a challenge for the district. No finding.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding the communication and staff non-renewals (p. 8).**

*The handling of staff non-renewals and transfers appears to be non typical as well. According to staff, there is not a traditional system which is clearly outlined for non-renewals. Non-renewal decisions are made by District staff unlike other New Jersey districts where those decisions are made at the school level. The principals expressed an interest in having a more active role in these decisions. The administrator and teacher transfer process is atypical as well. Last Spring administrators were transferred to different schools before the end of the school year. Many moves are reported to happen on an annual basis. This affects consistency and continuity for all.*

According to the focus groups by both principals and supervisors on March 18, 2024, it was reported that this section on non-renewals was inaccurate. Non-renewals and transfers are determined by the school principal. The claims about the non-renewals are false and the focus groups were bewildered as to the context. Principals observe and evaluate all staff. District supervisors support with observations but are not the ones making a final determination. There is a district committee that reviews all non-renewals to ensure all of the evaluations and due processes have been followed, however the district committee does not initiate non-renewals.

In the district reconfiguration in spring and summer of 2023, the Lakewood superintendent did make a determination to move some of the principals to other schools. This is not an uncommon practice across the nation. There were concerns at some schools and the superintendent thoughtfully reassigned principals. There needed to be a reassignment due to a principal out on a leave of absence. There was one principal transferred to serve as Interim principal to fill the leave of absence. This is not an uncommon practice to support schools in the district. Why this was cited in the report is a concern. Principals were notified in the spring of that school year, which is typical and not out of line. The notification in the spring helps ensure the principals who are moving will be prepared by July 1. Again, this is not a finding. This is a typical timeline for both moving a principal and for notifying the changes in leadership.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding the district reconfiguration (p. 8).**

*The example above of the sudden reconfiguration of schools speaks to the lack of intentional planning in the District. This new grade-span (elementary and middle) configuration has added more transitions for students. Students' academic, emotional, and physical development and well-being should be at the forefront of all decision-making. Under the new configuration, it is possible for a student to attend five LPSD schools throughout their academic career. And, under this new configuration, there are now families with children in four different elementary schools creating significant logistical challenges for these families.*

The Lakewood school district, as mentioned above, started planning for the grade reconfiguration in spring of 2023. This grade reconfiguration allows for improved instructional experiences and greater alignment of resources and practices, while giving rising 6th grade students an additional year in elementary school. The reconfiguration of grade levels was recommended to the board by the superintendent in March of 2023, due to changes in student enrollment. The Board approved the changes on March 22, 2023 (6 months prior to the implementation).

This is not a finding due to the lack of evidence that a reconfiguration is unsupportive of students and families. Many districts across New Jersey plan out reconfigurations and there is no finding against them. This is no finding due to the lack of evidence.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District regarding school board meeting agendas (p.10).**

*The LPSD board meetings are conducted with a consent agenda where agenda items are voted as a package without discussion unless a board member asks for removal of an item. Included within the consent agenda are the first and second readings of policies. There are no discussions of action items, no committee reports, no discussions, and very little public comment. Most school boards in New Jersey have a Policy Committee that meets to discuss changes and updates to existing policies and drafts of new policies. These policies are given first and*

*second readings where there is open discussion among board members about these policies and the public is given time to comment as well.*

As mentioned above in the school board section, there is no requirement for the Lakewood School Board to pull consent agenda items for discussion or to have the first and second readings of policies as a separate item. All school boards are different. There is no requirement nor can one mandate a board or a board member to comment on items. In fact, most school board meetings do not pull items or discuss policies unless it is a changed policy or new policy that impacts students or staff. The comments in this finding are concerning because again, it is based on subjective ideas and not fact, which is required. It is important that a finding truly is a violation versus a subjective comment by an author of a report.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding board approval of financial awards and vendors (p. 10).**

*In addition, board approval must happen at the time of vendor onboarding, and this does not appear to be happening in the LPSD. It appears the approval of the bill list on the consent agenda for making payment is considered the approval of the vendor. The vendor must be approved by the board before payment can be issued. In addition, Business Registration Certificates (BRC) and W-9s must be maintained for all vendors.*

In this review, it was discovered that the Lakewood School District has a process for all of the concerns above. It is questionable why this would be put in the report as a finding when there is evidence in the finance department. The department has a process for vendors that are awarded through a procurement process such as Bids, competitive contract, and Request for Proposal (RFP). Professional services are approved prior to the bills listed as part of the Board Resolution approving the award of the contract. Vendors that are added through the use of cooperative purchasing units are also awarded by Board Resolution prior to any bills listed if the bid threshold has been exceeded. Vendors for small purchases that do not exceed any procurement (\$45,000) thresholds are added as requested as long as the proper documentation is presented. All W9 forms are collected and maintained by the finance department for all vendors. NJ Business Registration Certificates are requested from all vendors and maintained BUT are not required for the following circumstances:

- Purchases below the quote threshold (although we request them anyway to have on file)
- State of NJ Contract Purchases
- Other Boards of Educations or Educational Commissions
- County, States Colleges and local authorities and boards
- Non-Profit Organizations
- Emergency Purchases (payment cannot be made until NJBRC is on files)

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding financial systems (p.10).**

*There are a series of financial systems that appear to be in place but not fully functioning. Rate changes and transfers are to be approved by the District Board of Education. The control is designed properly for this; however, there is no evidence that these approvals are taking place.*

All rate changes to contract amounts are always board approved. Funding transfer report is presented to the board for approval on the Business agenda. This is evident in the board agendas. No finding.

## CURRICULUM AND INSTRUCTION

There were two sections of the Comprehensive Review of Lakewood Public School District that focused on Curriculum and Instruction. Below are from the summary on pages 3-4 and 10-13 of the report.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding curriculum development (p. 3).**

*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.*

The Lakewood School District is intentional in the role of teachers and supervisors in the curriculum writing process. The district researched both math and literacy textbooks and curriculum and found that there was not a sufficient amount of the NJSLs included in the textbooks. The district is reflective and includes teacher voices in the creation of the curriculum. All of the curriculum and lessons are designed to support the NJSLs. The district has its curriculum mapped out to ensure there is a verification of all standards.

The model of an assistant superintendent would not create consistency. The current model works for the district. The district should be commended for eliminating this additional bureaucratic layer. Lakewood's leadership team is highly collaborative and works together with teachers on curriculum. This was observed first hand in the school site visits.

*Curriculum Differentiation. The intense focus on pacing guides, instructional frameworks, and lesson scripts leave little room for differentiation in the classrooms. Teachers reported limited time to pause to ensure mastery.*

In the onsite school and classroom visits on March 19-20, 2024, there were observations of teachers using the framework for lesson delivery but there was not a sense that the teachers could

not add their professional judgment to the lessons. It was not observed as rigid but more fluid. Some teachers did not use the script but hit all of the key components. The district coaches in the focus group stated that they work with teachers and encourage them to not adhere to the script strictly. They coach and encourage teachers on how to use the outline of the lessons.

*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.*

It is important for administration and principals to be present in the building. The district requires administrators to perform 3-5 walkthroughs a day. This policy gets the principals out of the office and into the classrooms. It is not an evaluation of the teachers. The principals all noted that they provide follow up in a positive manner. Evaluations are performed at a different time.

*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.*

Lakewood has an intentional framework and interventions. The language of MTSS was confusing to the staff in focus groups and site visits. When asking staff about the interventions, however, they were able to talk about the different interventions the district has and uses for students. The district has a rich intervention program throughout the district. The issue was that when the PCG consultants used the term MTSS the staff was unclear, as they were more familiar with the term RTI.

Based on the below chart, the Lakewood school district has a significantly different student demographic population when compared to the other surrounding districts. These were the districts that the Comprehensive Review of the Lakewood Public School District chose, and yet they are not comparable. All of the intentional work that has been presented above has supported the students of Lakewood.

	LAKWOOD	JERSEY CITY	TOMS RIVER	JACKSON	BRICK
Number of Students	4,888	26,625	14,498	7,572	8,247
Number of Schools	8	39	18	10	12
Percentage of Multilingual Learners (ML)	36.7%	15.5%	3.5%	6.0%	5.4%

Percentage of Students with Disabilities	28.8%	12.9%	19.6%	17.6%	20.1%
Percentage of Economically Disadvantaged Students	82.2%	51.3%	28.6%	28.3%	31.8%
Percentage of Students who met or exceeded ELA State wide assessments	34.1%	41.2%	45.0%	44.7%	42.6%
Percentage of Students who met or exceeded Math state wide assessments	23.7%	25.9%	28.0%	37.2%	29.5%
4-Year Graduation Rate	82.3%	78.0%	89.8%	95.0%	93.1%

Data provided from the Lakewood Response Letter, March 11, 2024

*Graduation/Dropout rates. Graduation rates are lower than the state average and comparable districts; dropout rates are higher.*

The Lakewood high school graduation rate of 82.3 percent in 2022-23 which is lower than the state of New Jersey’s graduation rate of 90.9 percent. This is a goal that the district has in their annual goals and the high school principal acknowledged this as a prior goal at the high school. The high school administration team is focused on this as well.

**In the Comprehensive Review for the Lakewood Public School District, March 2024, the curriculum and instruction section focused on educational programs, curriculum and instruction, which are the heart of the educational experience (p. 10).**

*The Curriculum and Instruction findings delve into the heart of the educational experience, examining the substance and delivery of the District's educational programs. This section rigorously evaluates the alignment of the curriculum with educational standards, the effectiveness of instructional strategies, and the overall impact on student learning and achievement. Through detailed analysis, areas where enhancement is needed to meet the diverse needs of students are spotlighted. This examination illuminates the challenges within curriculum and instruction, emphasizing the critical role they play in shaping students' academic journeys and the urgent need for targeted improvements.*

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding early entrance policy (p.11).**

*The first critical finding relates to the kindergarten entrance age of students in Lakewood Public School District. District Policy 5112: Entrance Age (2013)<sup>6</sup> 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.” In a typical New Jersey kindergarten classroom, students entering kindergarten must turn five-years old by October 1<sup>st</sup> as per NJ Rev Stat § 18A:38-5 (2022) which is a statutory requirement. In this case students are only four-years old for the first month of school. In the LPSD, a four-year old can be in the classroom up to the first four months of school. This makes it possible for a kindergarten class to have four-, five-, and six-year-old students in the classroom simultaneously. This creates a potential ripple effect moving forward across the entire schooling of a child with the learning gaps widening year-after-year. As referenced in Exhibit A, 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).<sup>7</sup> This policy allowance potentially impacts every area of concern for the District: Curriculum and Instruction, Financial, Governance, Special Education, and Transportation.*

The Lakewood School District has the ability to determine their own policies. The National School Board Association and New Jersey School Board Association have suggested policies. It is up to each school district to determine the policies that support the local school community. In the instance that Lakewood School District has 82.2 percent identified as free and reduced lunch, the research is more favorable and beneficial to the students starting at an earlier age in school rather than continuing in daycare. Early childhood programs have strong research on the benefits of early education.

Given that this is a policy that the Lakewood School District has adopted, it is believed that this policy is made to support the needs of the community. As with any policy, it is up to the parents to determine if they want to send their child to school at an earlier age. Also, the difference of two months between the Lakewood School District policy and the NJ Rev Stat § 18A:38-5 (2022), which is by October 1<sup>st</sup>, recognizes that the district understands the needs of the community and allows parents the option for their child to enter kindergarten. All children develop at different stages and that is why it is important for parents to work with the school district on when they feel their child is ready. A policy is in place to allow for the parents to have the option, but does not require parents to enroll their child into kindergarten at an earlier age.

According to the article: *Making Informed Decisions about Academic Redshirting and Retention through School and Community Partnerships*:

“Children grow and develop at various rates; therefore, parents and educators must collaborate to decide when a child will begin public school based on individual social, emotional, and academic needs.”<sup>9</sup>

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<sup>9</sup> Hover, A.(2018). Making Informed Decisions about Academic Redshirting and Retention through School and Community Partnerships. *International Journal of Whole Schooling*, 14(2) 53-62.  
<https://eric.ed.gov/?q=&id=EJ1190027>

The district would like to point out that the data in the report was incorrect. The district's data shows that at the time of the extract there were 260 in-district Kindergarten students and 47 out-of-district students. The district information technology director reports that there were 476 Kindergarteners in total (including all students with birthdays before October 1st and those after October 1st).

This particular finding, again, is subjective and the recommendation of the Comprehensive Review would limit the district in creating policies that align to the needs and options of the community.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding the housing of early childhood (p. 11).**

*The Lakewood Early Childhood Center (LECC) is housed in three modular-trailer classrooms. Two of the trailers are connected, and one is separate. The interconnected trailers have Physical Therapy equipment in a separate setting in a Snoezelen Multi-Sensory Room. The disconnected modular-trailer classroom does not have access to these resources. Again, the number of students in the LECC is higher than most districts due to its policy that extends past the October 1, cutoff date in preschool as well.*

The site visits revealed that the Lakewood Early Childhood Center (LECC) does have 2 Snoezelen Multi-Sensory Rooms that provide a sensory experience in two of the three campuses. The third sensory room will be installed in spring 2024.

In a review of the NJDOE website, there was no requirement nor mention of the multi-sensory room. The multi-sensory rooms are utilized for all students attending Early Childhood to access and the staff support the students in the room. This is not a finding but an example of how Lakewood Schools supports their students by having programming above the requirements of early childhood programming.

**Below is an additional finding from the Comprehensive Review of the Lakewood School Public School District, regarding the district structure (p. 11).**

*The overall organizational structure of the District is unique in comparison to other traditional public schools in New Jersey. The LPSD superintendent has 24 direct reports. There is no assistant superintendent. The board attorney reports directly to the Board of Education. In most districts in New Jersey, the only person who reports directly to the board of education is the superintendent. This structure may be contributing to issues in multiple areas across the district. Inefficiencies come into play when there is confusion among staff members as to which position has greater influence or is the decision-maker. Delegation can be difficult in a flat structure such as this where it is unclear who is responsible for what work and when and where decisions can be made without bringing everything to the superintendent for approval. This is not efficient, economical, or a best practice instructionally.*

The district is led by a superintendent who has been with the district since 2012. This fact should be commended because the average tenure of a superintendent is 5.5 years according to the National School Board Association. The superintendent is an intentional leader. She believes that it is important for her to be as connected to the classroom as possible. Having 24 reporting administrators is a flat administrative configuration that is intentional. The reporting administrators are primarily in buildings supporting schools, students, teachers, and families.

There is no finding because this is a recommended model of leadership. In fact, the staff in the focus groups stated that they feel supported by the superintendent and appreciate that if there is a question or concern, they can go directly to her. If the district had an assistant superintendent, it would curtail direct access to the superintendent. Lakewood has a culture of supporting one another and the leadership structure is another example of how the district is intentional.

In both the focus groups and in the site visits, it was evidenced that the principals and the central office staff have a connection and work very collaboratively. They all have a sense of support and respect for one another.

**Below is an additional finding from the Comprehensive Review of the Lakewood School Public School District, regarding curriculum development (p. 11).**

*The curriculum in Lakewood Public Schools is developed by district staff: curriculum supervisors and instructional coaches. There is a lack of evidence, research-based, current resources to support the curriculum. A variety of curricular resources support English Language Arts/Literacy. At the Early Elementary level, there are some purchased materials. The resource being used beginning in Grade 3 is dated 2013 and the textbooks at the high school level are from 2015. The District just purchased a 3-year program for the high school which is digital only and being piloted in some of the high school classes. Further information is needed about how students without technology or connectivity access the materials from home. These materials are supplemented by the individual curriculum supervisors, of which there are 6. Without an Assistant Superintendent, each curriculum supervisor can make changes in their content area without a balance among recommendations between content areas. The implementation of an evidence-based, standard-aligned writing curricular resource does not seem to be a high priority for the district. With a large number of multilingual learners, language skills, grammar, linguistics, and learning to write is an equally critical skill to focus on simultaneously with reading development to support literacy development.*

The Lakewood district is an intentional district regarding curriculum. Often, districts purchase a curriculum and follow the scope and sequence of the curriculum. The research-based process that Lakewood utilizes is to map out the standards and create lessons that accommodate the needs of supporting a district where 36 percent of students are English Language or Multilingual Learners. The district is highly regarded by other districts because of the professional development that is provided to teachers. They participate in the summer curriculum writing for both literacy and math. All standards are aligned to the grade level standards set by the NJSL.

In addition, teachers participate in Professional Learning Communities (PLC) to review how their students are performing in the curricular units and on unit assessments.

In the focus groups, teachers reported that this is one of the reasons they stay in Lakewood. Because they have teachers leading the curriculum across the district and are reflecting on the pacing guides and standards, it gives them the support they need to help their students. Again, no findings in this section.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding district math (p. 12).**

*At the elementary and middle schools, the mathematics curricular support materials are all created within the District for all grade levels (i.e.: student workbooks, worksheets, and teacher guides). In high school, traditional textbooks are used. This is concerning as locally developed curricular resources are not researched, backed or supported. Concern was also expressed about the alignment of lessons and materials to the NJSLS mathematics academic standards. Vertical alignment in mathematics is critical for developing standards (i.e.: Algebra) that develop over time from kindergarten through high school.*

*Scripts and pacing guides for the curriculum are designed by the District. The messaging around scripts is different from school to school. There is written guidance that the teachers must be within ten days of the pacing guide. Change is constant as curriculum supervisors are constantly reviewing and updating the pacing guides. This strict structure leaves little room for differentiating to support the needs of individual students.*

The Lakewood district does have a curriculum that is designed to ensure an interactive experience with the NJSLS. It is common for districts to write their own curriculum that aligns with the state standards. The district regularly reviews the curriculum and accompanying resources each summer. This process often includes grade level representatives along with district level personnel. The district aligns the math and ELA resources at each grade level to the math NJSLS and creates a pacing guide to map out the units for the year. This is a highly regarded model for mapping out key skills across each grade to ensure standards are addressed throughout each grade level.

At the Kindergarten and grade 1 levels, the primary resource is a program called *Curriculum Associates Ready Classroom Mathematics*. In addition, all teachers in K-8 have access to the [Ready Math toolbox](#) which includes supplemental resources for the grade level standards.

The resources created by the District math team are fully aligned to the standards as they were developed and designed by looking at each standard and then creating multiple lessons to meet that standard. This was done for every standard in every grade level in Grades 2-8. (See Appendix D). Additionally, in grades 3-8, the district teachers analyzed how the State assesses the NJSLS by reviewing the NJSLA questions that have been released. The district embedded these questions and the State's interpretations of each standard into the curriculum so that students would have a comprehensive understanding of the content.

The Lakewood School District, several years ago, reviewed for a new math curriculum and there was no math textbook that fully aligned to the content and strategies of the NJSL. The district therefore adopted a model to create individual lessons to fill in the textbook gaps which would result in a disjointed and piecemeal math program. The district took on the task of writing lessons for every standard. This allowed for the district to incorporate Universal Design (UDL) strategies to support students in the general education program who were struggling.

Another benefit to the District math team authoring the lessons in grades 2-8 is that there is a clear vertical alignment between the grade levels. When introducing a grade level standard, the topic is first tied back into the connecting standard from the previous grade level and then built upon. This strategy helps students make the connection between what they have learned and how that topic progresses throughout the grades.

Teachers are provided with detailed lessons that outline how to effectively explain the content to students. The goal of the format of the lessons is to make sure all teachers have a thorough understanding of which aspects of a lesson should be emphasized and how they could go about doing this. It has been expressed to teachers that, although it is written as “a script,” it does not need to be read or memorized word for word. It is an expectation that the main objective and strategies within each lesson be addressed with fidelity to maintain the consistency between and across grade levels. If revisions are ever made to a lesson or to the pacing guide, it is in response to the feedback that has been received from the majority of the teachers at that grade level.

The finding above is not founded because the district is doing a best practice model in mapping out the state standards, cross mapping by each grade, and mapping throughout the year. Lakewood is a reflective school district and it is not a one-size-fits all. Lakewood regularly reflects on what is working and where they need to make adjustments to meet the needs of the students.

Grade	Math Curriculum
Kindergarten	K Math Ready Classroom Teacher Guide 2021
1 <sup>st</sup> Grade	Grade 1 Math Ready Classroom Teacher Guide 2021
2 <sup>nd</sup> Grade	Grade 2 Math Teacher Guide
3 <sup>rd</sup> Grade	Grade 3 Math Teacher Guide
4 <sup>th</sup> Grade	Grade 4 Math Teacher Guide
5 <sup>th</sup> Grade	Grade 5 Math Teacher Guide
6 <sup>th</sup> Grade	Grade 6 Math Teacher Guide
7 <sup>th</sup> Grade	Grade 7 Math Teacher Guide
8 <sup>th</sup> Grade	Grade 8 Math Teacher Guide
9 <sup>th</sup> Grade	Algebra 1, Big Ideas Learning, 2022
10 <sup>th</sup> Grade	REVEAL GEOMETRY, McGraw Hill, 2020
11 <sup>th</sup> Grade	Algebra 2, Bid Ideas Learning, 2022
12 <sup>th</sup> Grade	The Practice of Statistics, BFW, 2020

\*iReady is the math intervention program utilized throughout the district.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding principal role (p. 12).**

*Lastly, the building principal does not have any oversight or decision-making authority over curricular decisions. This relates back to the flat reporting structure with 24 leaders reporting to the superintendent. Principals are often not in traditional roles of leadership in their buildings.*

*There is a large amount of oversight for teachers. Walkthroughs are conducted regularly to a point that seems excessive. There are approximately 50-75 walkthroughs a week which could add up to as many as 200-300 a month. These numbers do not include required formal observations. Using the time of leaders this way does not allow much time for additional responsibilities that contribute to student success.*

The focus groups with principals, assistant principals, and supervisors did not report this section to be factual. The principals hire and evaluate staff. They work collaboratively with the content area supervisors for support and work together on walkthroughs, curriculum, and during PLC meetings. Lakewood is not a compartmentalized district but a district with high levels of efficacy and collaboration among the leaders.

Walkthroughs are an effective way for principals and administrators to be present in classrooms. It was evidenced when on the site visits that students respected the principals and the teachers were glad to see them. The on-site visits were not “staged.” Being an educational expert, it is clear when administrators are regularly in their office instead of out in the classrooms. This is another best practice process and the “finding” of the walkthroughs is concerning due to the fact that it is a way for principals and teachers to be engaging positively with one another.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding district policy 24178 (p. 12).**

*While the District adopted Policy 24178 : Student Intervention and Referral Services (I&RS) in 2013 and updated the policy to reflect the adoption of New Jersey’s Multi-Tiered Systems of Support (MTSS) Framework in 2022, staff generally shared they either didn’t know what it was or said their school doesn’t use it. MTSS requires tiered levels of support for students moving from Tier 1, classroom support, to Tier 3, individual support. Staff felt due to the strict structure and pacing of the local curriculum, there is no time for scaffolding supports in this way. Tier 3 intervention stops in third grade so there is no Tier 3 reading intervention in grades 3-5. This is especially problematic given the local policy extending kindergarten cutoff date to December 31<sup>st</sup>. Many students in*

*grade 3, are still developmentally young and are continuing to struggle with reading. Without tiered supports and structured intervention time, the gap will continue to expand for students.*

*The Lakewood Public School District has a high number of multilingual learners. It employs 36 English as a Second Language-certified (ESL) staff. Students coming into the district have various needs when it comes to language support. Some students come with gaps in formal education as well as and can be two or more grade levels behind. The District provides a variety of services for students: Bilingual classes, taught in the student's native language; Sheltered English Instruction classes taught with a variety of techniques; and Newcomer Program which is focused on those students with gaps in formal education. This report finds that while there are a great number of employees and offerings for multilingual learners across the district, offerings are not available in all schools yet there are students who need the services not offered in each school.*

The Lakewood district has both literacy and math curriculum and interventions mapped out by grade levels. The district has a well-planned Tier 1 (core curriculum), Tier 2 (interventions), and Tier 3 (special education separate curriculum). The finding is misinformed. The district's interventions range from kindergarten up to high school. The district uses iReady for math intervention up to grade 8 and for literacy they use Istation. This is mapped out in the Appendix B of this report. During the focus sessions, one of the questions was about MTSS and the staff are not familiar with that terminology. Once the question was framed around interventions, however, the staff was able to discuss in-depth the various intervention programs and progress monitoring systems throughout the district.

Again, there are no findings in this section because the previous report did not contain correct information from the district. The information was provided and it is clear there is intervention programming provided to the students. This was also evidenced in the walkthroughs throughout the district.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding high school pathways (p. 13).**

*The District offers multiple pathways and has allocated significant resources to support high school students on their journey toward college and career preparedness: Dual Enrollment, Vocational Education, Career Academy Pathways, and Advanced Placement (AP) and International Baccalaureate. However, the number of students participating in most of these programs is low. Of the students participating in the AP program, 66% of students did not take the AP Exam which allows students entering college to place out of these courses and potentially receive credit for the course as well. Of the students taking the exam, few receive a passing score. In the 2022-2023 school year, only 5 students participated in the full-time Career Pathway program.*

The aforementioned AP participation percentage is factually incorrect. 100 percent of students who enrolled in an AP course in 2022-23 participated in the AP College Board exam during the Spring 2023 administration. The district continues to review courses and consistently looks to add additional AP, college bound courses and career pathways for students.

In the focus group with high school students on March 20, 2024, students reported that they felt their teachers and school had high expectations for them. All but two students were going to a four-year college and the two students who were not going to a four-year college were going to go to a trade school program. The students all stated that they did better in school because of the teachers and administration at the high school - especially this year's high school administration.

*The District supports Professional Development (PD) for staff in a variety of ways. Curriculum supervisors and instructional coaches use data to determine professional development opportunities. There are three professional development days built into the calendar before the start of the school year. PD is also offered through Professional Learning Communities (PLCs), staff meetings, and virtual options throughout the year. Staff expressed frustration because PD is often offered during their prep time and/or they are pulled from instructional time with their students.*

According to the research on Professional Learning Communities (PLC),<sup>10</sup> the benefits of a PLC is to have educators engage in their own learning and examine their own teaching in real time. This concept creates stronger teams and is less about the restrictive professional development that many educators report as not relevant. The Lakewood school district adopted the concept of a PLC several years ago. They have continued to support the relevant teaching group concept because teachers in the focus groups on March 18, 2024 reported it as a support to them in their growth as a teacher. This is not a finding but this is another example of how Lakewood public schools have continued to reflect and adapt to the needs of the staff and students.

*Last findings in this area, but critically important, are in the areas of student engagement, instructional groupings and techniques, and student behaviors. Data shared in Exhibit A, pp. 69- 73, shows that students were well behaved and on task, however, this seems to demonstrate compliance more than anything else. Students were spending a lot of time in whole class instruction: listening to a lecture, looking at a computer screen, or working on worksheets or in a workbook. There was very little discussion or interaction happening in the classrooms, particularly in the middle and high school classes. Best practices (small group instruction, turn and talk, creative grouping, and collaboration opportunities) for instruction were observed in a few classrooms but were largely missing in most. Most students were seated in desks that were arranged in rows. No multi-lingual services were being delivered in any of the classrooms visited. About 30% of the classrooms visited were either taking a test or preparing for one. High quality instruction, instructionally sound curriculum supported by*

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<sup>10</sup> Serviss, J. 4 Benefits of an Active Professional Learning Community. May 13, 2022. Retrieved: <https://iste.org/blog/4-benefits-of-an-active-professional-learning-community>

*research-based materials, and opportunities for students to participate as active learners are the best strategies for being prepared for a test.*

Again, this is another example of a subjective finding with no legal merit. The report stated that students were well-behaved, and yet this was criticized. If the classroom was loud and students were out of their seats, the observers would have then criticized the district for that. The observations in the report are a snapshot in time, are too subjective, and seem very negative on the teaching staff. Lakewood Public Schools has a focus on curriculum and instruction. They conduct instructional walkthroughs weekly and this provides an opportunity for staff to reflect on their instruction. It is based on a continuous improvement model. Too often, teachers state that the only time an administrator comes into their room is when there is a formal evaluation. It is commended that the Lakewood School District is focused on instruction and the reflective art of instruction. If there was a finding, it should be when there is no process in place for instructional walks. This is not the case in Lakewood Schools and yet, the district has a finding in this area. The fact that the superintendent is highly involved should not be criticized. Educational leaders or superintendents often are not involved in the curriculum and instruction of the district. This should be a commendation and not looked upon in a negative manner.

In the on-site school visits on March 19, 2024, there was consistency throughout the buildings and classrooms of an instructional format. Teachers all had objectives displayed and students were engaged in the content portion of the lessons. There were also various co-teaching methods used throughout the buildings. There was also a variation of materials provided to the students throughout the instructional time. There were some scripts being read in the classroom but they were seemingly used as guides. Some teachers reported to not be using the script but to create the content in their own words. The on-site classroom visits demonstrated a consistency that is not seen or observed in many districts. There was a clear focus on instruction and the format of delivery for students. There was also differentiation observed to support students during independent time. Again, these findings are not warranted nor are they findings. The observers in the Comprehensive Review were subjective and biased.

**SPECIAL EDUCATION**

Below is the section of findings for special education where the Comprehensive Review of the Lakewood Public School District goes into details of each finding. There is a response for each finding below from pages 14-17.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, Special Education regarding disproportionality (p. 14).**

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

- *White students are 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. This is not the first time the District was found to be significantly disproportionate.*

In the finding, it was messaged in a manner as if Lakewood School District did not complete the self-assessment, which is inaccurate. All of the schools that were identified for disproportionality filled out the self-assessment, created a plan, and followed the plan up with a detailed account of how the funds will support the plan.

There are 546 public school districts in New Jersey in which 410 have been identified as disproportionate, according to the NJDOE website (retrieved March 2024). Disproportionality has been a focus of many districts and consistently, the districts need to work with the state to ensure the funds and plans are being executed. It is exactly what Lakewood has been doing. It is again unfortunate that the author of the report made the finding about a lack of followup on the self-assessment, which the district has provided.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, Special Education regarding out of district placements (p. 15).**

*During the 2022-2023 school year, the District had 333 students in specialized out of district placements. Most students in these out of district placements across three years were those with speech or language impairment as a primary disability. It is unclear why there are so many students with this diagnosis in out of district placements. It could be that there are secondary and tertiary disabilities.*

*During the 2022-23 school year, the Child Study Team (CST) received 841 referrals for special education. As of November 2023, there were 319 referrals for the 2023-24 school year. General observations of these data show that the majority of referrals are from Early Intervention and parents, with far fewer coming from schools. The number of early childhood students with IEPs is concerning. This is typically a time when districts are slow to refer students for assessment due to difficulty discerning what is a potential learning disability and what are just normal differences in development and language acquisition. 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. 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.*

The findings that the district has a concerning number of early childhood students with IEPs is troubling. This statement demonstrates that the author has a lack of understanding of legal matters and trends for student referrals. As stated in the above paragraph, the majority of the 319 students referred in November 2023 were of preschool age. Chapter 193 starts at age 5 and therefore all preschool referrals go to public school. This is not an uncommon practice. Chapter 193 evaluations start at age 5. There is no merit to the above concern.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, Special Education regarding co-teaching (p. 15).**

*Parallel teaching is a primary focus for the District this year. In parallel teaching, the class is divided between two teachers and taught the same content. This model of instruction does not allow the groups to switch. The District hired an outside provider to train the staff this year. 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.”<sup>11</sup> The concern with this interpretation of parallel teaching is that it reverts to the model used decades ago where student with disabilities were pulled to the back of the classroom and taught in the room but separately from their peers. This is not the intention of this model today. This approach makes it clear to the students which teacher is supporting which students instead of a true co-teaching model where both teachers are supporting all students and students are not singled out within the classroom for their disability. Another problem staff are facing with this model is that the special education teacher is often getting pulled from instruction to attend meetings which means the parallel teaching cannot occur.*

Lakewood Public Schools should be commended for having invested in the professional development for co-teaching. Co-teaching is the most effective manner to increase inclusion by having the students supported in the general education environment. The above comments were critical of co-teaching and judged the process. There are five methods for co-teaching that the district provides guidance and professional development. During the classroom visits, which was a snapshot in time, there were four of the five co-teaching methods observed. Lakewood Public Schools promotes co-teaching and is thoughtful in creating the opportunity to have the teachers support the students in the natural environment. The district has been working to move students from self-contained classes into inclusion classes. The students that were receiving the majority of their literacy and math instruction from a special education teacher went from 451 students in 2022-23 to 359 students in 2023-24.

Based on student data, the teaching staff determine an ideal group size and intensity of support for each student to access their education in this setting. To increase least restrictive environment (LRE) opportunities for the 2023-24 school year, the parallel teaching model was encouraged as it optimizes instructional support and promotes students' abilities to be integrated within the mainstream classroom. This again is not a finding.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, Special Education regarding special education resources (p. 16).**

*During site visits to the District, it was noted that in the Autism Classes students appeared to be struggling to communicate. The team asked about Augmentative and Alternative Communication (AAC) systems, and the teachers responded that none of the IEPs required AAC systems. There were inconsistent strategies to reinforce appropriate communication and engagement. There were no data sheets or evidence of data collection relative to academics or behavior. The consultants did observe examples of staff providing students with edible reinforcements (gummy bears, cookies) to induce alternate behaviors in a manner that did not appear to follow any established formal reinforcement protocol.*

*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.*

The observations by the consultants seem to be critical of the teachers, who in this day and age, after COVID, should be commended for the support they provide for their students. In the focus groups, teachers discussed their process for individualizing the curriculum and adaptation for some students. They all stated that they know the academic levels of each of their students and they make sure they are able to accommodate their student's needs, while presenting a consistent lesson. In addition, the district has worked with teachers for years through professional

development to help the teacher to have the ability to modify curricular materials based on the individualized needs of the students. Furthermore, special education teachers are required to modify based on the needs of their students. Lakewood has a *Special Education Expectations* with modified pacing, examples of Math Framework, ELA modifications, Math Modifications and Lakewood Special Education Expectations. In the expectations document, it states “The student shall be provided modifications to the instructional strategies or testing procedures, or other specialized instruction, to access the general education curriculum in accordance with the student's IEP.” In the observation with PCG, it was reported that they went into several classrooms for a brief moment and took that observation as determination for the entire instructional time. This is not a finding. This is a misunderstood judgment of teachers and not considering the entire instructional time.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, Special Education regarding Least Restrictive Environment (p. 16).**

*The Administrative Code offers settings that require a maximum number of students and the number of teachers and aides that must be present. These include the following: Language and Learning Disability (LLD), Multiple Disabilities (MD), Emotional Regulation Impairment (ERI), Autism (AUT), and Visually Impaired (VI). The District offers some of these settings, but they are not offered consistently across the grades. In other words, a child in need of one of these settings may be able to attend a program in the district, depending on the specifications of their IEP, however, it may be available in some years but not others causing the child to need an out of district placement. LPSD does not have settings for Emotional Regulation Impairment, Visual Impairment, or Intellectual Disabilities. There are some concerns about the IEP process. In most IEPs only the teacher scale was included. The parental scale and parental input seemed to be missing. There were inconsistencies with IEP development, especially relating to measurable objectives relating to the goal. In some cases, the goals only focused on academics and not student challenges with organization and attention. Goals and objectives did not seem to fully align with the student's needs. While goals were generally aligned to the PLAAFP areas, it would be hard to measure progress or understand how the students were going to improve in these areas based on how the goals are written. 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 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.*

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding Special Education structure and due process hearings (p. 16).**

*In the 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. Some of the challenges that come with these lateral positions it is leads to duplication of time and confusion about authority. In the LPSD, 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. 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 the consultants 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.*

The findings around the special education cases, and that the district has had 0 cases going to a due process hearing, is concerning. Most Departments of Education understand that due process hearings are available for parents to bring forward. If the parents do not want to engage in a due

process hearing, that is not the fault of the district. Also, it is well known that most Departments of Education encourage settling with families because the due process hearing is hard, not only on the families, but the teaching staff. It strains the relationship between families and the schools. “Parents and districts are encouraged to use facilitated team meetings, mediation, conciliation, or another mutually agreed upon alternative process to resolve disputes before proceeding to hearing<sup>11</sup>.”

They are costly and the results often are equal to a settlement. So again, here is a citation of a finding that is critical of the district when they are doing what is right. If they had 5-10 due process hearings a year, the report would have to be critical of the district. This report has too many contradictions. It cannot be both ways or blame the district if they do it one way or the other.

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding nonpublic students (p. 17).**

*The Lakewood Public School District has 170+ nonpublic schools in its boundaries. This has far reaching impacts on the district especially around special education. Of students parentally placed in nonpublic schools, nearly 9,700 of them are students identified with a disability. The number of students eligible for special education has 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. 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. 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.*

In 2020-2021, COVID affected many districts across the nation in referrals to special education, especially at the early childhood levels. Because of COVID parents were not sending their young children to school and they were not being referred. The trend of lower numbers of students in special education in 2020-21 and higher numbers in 2022-23, is on trend nationally. Many

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<sup>11</sup> Department of Education website, retrieved March 2024.

districts are decreasing in overall student enrollment and still seeing an increase in special education students.

In the district's disproportionality self-assessments, each school has a plan that includes CCEIS funds to support the interventions for non-special education students. This is not a finding. The district has a plan for interventions and the special education determination has demonstrated interventions for all students prior to special education referral.

## FINANCE

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, regarding finance (p. 18).**

*The Lakewood Public Schools has a high percentage of students with IEPs receiving services and support from out of district placements. This creates large financial stress on the district.*

*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 \$121,282.16 The tuition total 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.*

The outside auditor addressed the lack of pre-payroll register and that the payroll checklist was not retained. The payroll manager was responsive and confirmed that evidence would be retained moving forward. It was noted in a discussion with the Lakewood Accounting Manager that the Close Process Checklist is not completed nor retained as evidence. Also, the State Monitor verbally reviews the cash flow statements monthly and evidence of the review is not maintained.

## TRANSPORTATION

**Below is an additional finding from the Comprehensive Review of the Lakewood Public School District, transportation (p. 19).**

*Transportation expenses are a strain on the District. The comprehensive review surfaced efficiency issues with potential financial implications for the District. There are two busing services set up to meet the high demands for student bussing, both public and non-public: Lakewood does not have its own bus yard. It contracts with outside vendors through the bid process. The Lakewood Student Transportation Authority (LSTA) was started as a pilot in the 2016-2017 school*

*year through Bill S204917 to meet non-public school student transportation needs. The law provided that an eligible district would pay the consortium the aid in lieu amount for each nonpublic student who required transportation under state law. The consortium takes on responsibilities of the District. If the consortium has money available after transporting all required students, it may provide courtesy bussing. The consortium must refund any unused funds to the District. The updated, further codified legislation allows for other similar consortia to form, it drops the size requirement of participating districts, savings may no longer be used for courtesy busing, and the consortium may assess up to a six percent administrative charge.*

*The Lakewood Public School District buses appear to be less full than the LSTA routes. There are a variety of buses being used for different age groups of students which may be impacting the number of routes needed. Looking at factors such as cost per route and students transported per route are two measures to examine the efficiencies of the routes. Student ride time, empty miles, and empty/idle time are other common measures. A bus route analysis using the data from the Versatrans Systems in both the LPSD and the LSTA might provide greater insight. This information was not available at the time of the report.*

*Some 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. Data entry errors were noted during the analysis. However, where those could be filtered out, significant examples remained of 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 (see Table 6 in Exhibit A for Top 20 Bus Plate Numbers by Sum of Route Cost). 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.*

New Jersey Legislative School Funding Issue Paper<sup>12</sup> was written after auditing the district for approximately 18 months. The Funding Paper clearly states:

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<sup>12</sup> New Jersey State Legislature Office of the Legislative Services, Report School Funding Issue Paper, 2024

“Lakewood school district may be considered a district confronted by severe fiscal distress and could benefit from the creation of an additional state aid category similar to commercial valuation stabilization aid because of the aforementioned reasons discussed in this paper, as well as the following:

Ocean County, specifically the Lakewood school district, could benefit from the establishment of a commission similar to the Monmouth Ocean Educational Services Commission (MOESC) and the Union County Educational Services Commission (UCESC) for its nonpublic student population. Both of these commissions were established to provide educational programs and services to students in a more cost-effective manner. The MOESC works on a contract basis with public school districts to provide services to nonpublic students, and the UCESC provides state-mandated services to over 4,000 nonpublic students enrolled in 70 nonpublic schools. Lakewood school district’s nonpublic enrollment of 42,396 represented 95 percent of Ocean County’s nonpublic enrollment. From fiscal years 2014 through 2022, Lakewood school district’s nonpublic enrollment increased from 23,652 to 42,433, an overall increase of 18,781 students (79 percent). During that same period, the number of nonpublic schools increased from 88 to 164, an overall increase of 76 nonpublic schools (86 percent).”

Clearly the New Jersey State Legislature Office is aware of the unique impact on Lakewood Public Schools due to the low percentage of students attending the public school system and the high percentage of students enrolled in nonpublic schools. This impact is significant due to the district having to provide special education transportation for students in the nonpublic program. Nonpublic student enrollment averaged 32,881 students, including 42,307 students in fiscal year 2021. The district amassed \$137.4 million in loans, which included a \$54.5 million loan in fiscal year 2021. Transportation and tuition costs totaled \$488.7 million. Of this amount, \$401.3 million (82 percent) were tuition payments for special education students sent out-of-district to approved in-state private schools for students with disabilities and mandated transportation of nonpublic students sent to nonpublic schools.

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

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.<sup>23</sup> PCG is not able to determine if ESSER III was spent on nonpublic transportation or if prior expenditures had been recoded to ESSER III. This raises a concern as to whether there may have been inappropriate use of \$14,043,275 of ARP-ESSER III funds for nonpublic transportation versus for learning initiatives.

Again, this can be categorized as misguided information and a conclusion that is critical and not fully verified by data. The Lakewood School District did not utilize the 20 percent set aside for

Learning Loss funds for \$14,043,275 of ARP-ESSER III Funds for nonpublic transportation. The Lakewood School District utilized ARP-ESSER III funds for nonpublic transportation based on the approval of: The former State Monitor, The NJDOE, and the Office of Grants Management. No findings in this area.

# APPENDIX

**APPENDIX A: STAFF SURVEY  
MARCH 13-MARCH 22, 2024**

Question on Survey	Number of Staff who Responded Agree	Number of Staff who responded Disagree	Number of Staff who responded I do not know
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	365 (89.5%)	27	16
Teachers differentiate instruction for our diverse student population needs.	341 (88%)	25	21
Teachers provide interventions to help students succeed in core classrooms.	353 (90%)	19	17
Teachers have collaborative relationships with families to increase opportunities for students to learn.	297 (76%)	48	48
Teachers need to supplement content areas when designing and teaching.	234 (68%)	37	72

There are structures and processes used to implement new programs and innovations that ensure success.	223 (60%)	83	67
Teachers ensure NJ Learning Standards (NJSL) are incorporated in their lessons and treated with appropriate depth and quality required to support student learning.	314 (88%)	12	29
I have the professional development I need to implement the New Jersey Learning Standards (NJLS) effectively.	265 (76%)	54	23
Teachers and school leaders participate in planned meetings to review and discuss data.	300 (85%)	24	31

**APPENDIX B. LAKEWOOD EVIDENCE BASED INTERVENTION AND CURRICULUM**

<b>GRADES K-2 Interventions for General Education &amp; Special Education Students</b>	<b>Supporting Evidence</b>
Istation ELA Computerized Intervention	<a href="#">Using Computer-Adaptive Curriculum to Increase Performance on NWEA MAP Growth Reading Outcomes</a>
Lexia Core 5	<a href="#">Evidence for ESSA for Lexia Core 5</a>
DIBELS Amplify 8th Edition Universal Screener, Progress Monitoring, and Instructional Activities for Targeted Intervention	<a href="#">White Paper</a> <a href="#">DIBELS 8th Edition Technical Manual</a> <a href="#">Understanding the research behind DIBELS 8th Edition</a>
Decodable Texts <ul style="list-style-type: none"> <li>● ReadBright Decodable Texts</li> <li>● Power Readers</li> <li>● Supercharged Readers</li> <li>● Just Right Readers</li> <li>● Whole Phonics</li> <li>● Letterland Phonics Readers</li> <li>● Project Read AI Decodable Text Generator</li> </ul>	<a href="#">Research on Decodable Text</a>
CKLA Knowledge Building Curriculum	<i>The Knowledge Gap</i> by Natalie Wexler <a href="#">Efficacy Study for CKLA (Kindergarten)</a> <a href="#">CKLA EdReports</a>
RTI <ul style="list-style-type: none"> <li>● Tier 2 for Reading K-2 (classroom teachers)</li> </ul>	Reading Rockets: <a href="#">Best Practice for RTI: Intensive, Systematic Instruction for Some Students (Tier 2)</a>  <a href="#">Efficacy of Response to Intervention for Students Struggling with Reading</a>

<ul style="list-style-type: none"> <li>• Tier 3 for Reading K-2 (Interventionists via Pull-Out)</li> </ul>	
<p>Tier 3 for Math K-1 (Interventionist via Pull-Out)</p>	
<p>Letterland</p> <p>Kindergarten Letterland</p> <p>First Grade Letterland</p> <p>Second Grade Letterland</p> <p>Letterland Intervention Manual</p> <p>Letterland Materials</p>	<p><a href="#">'Learning Letters: Evidence and Questions From a Science-of-Reading Perspective' Reading Research Quarterly: 0(0) Pages 1-22.</a></p> <p>Quotes from the Article:  "Children who received the explicit instruction with...[Letterland] learned almost twice as many letter sounds." p.7  "This finding suggests that... [Letterland] was protective against low performance." p.16</p> <p><a href="#">'Letter sound characters and imaginary narratives: Can they enhance motivation and letter sound learning' Early Childhood Research Quarterly: Volume 42. Pages 97-111.</a></p> <p>Quotes from the Article:  "To help children learn all of the letter-sound correspondences, some phonics programs teach mnemonic devices. For example, in the Letterland program (Wendon,1992), the shape of K is drawn as the body of "kicking king" whose first sound, /k/, is the sound of the letter. The shape of S is drawn as the body of "Sammy Snake." In this way, an easily remembered mediator is taught to help children connect the shape of the letter to its sound. Research shows that this makes it easier for the children to learn the correspondences (Ehri, Deffer, &amp; Wilce, 1984)"</p> <p>"Integrated, or embedded, mnemonics is a promising approach for teaching letter sounds (de Graaf, Verhoeven, Bosman, &amp;Hasselmann, 2007; Ehri, Deffner &amp; Wilce, 1984; Shmidman &amp; Ehri,2010). Integrated letter mnemonics are letter shapes embedded in a familiar action, object, or character. For example in the Letterland program (Manson &amp; Wendon, 2003), the letter "d" is embedded in a picture of a duck named "dippy". The word "duck" contains the phoneme that the letter "d" typically represents. Three small-scale experimental studies have shown</p>

	that integrated mnemonics promoted greater learning of letter sounds than did carefully matched alternatives (de Graaff et al., 2007; Ehri, Deffner, & Wilce, 1984; Shmidman & Ehri, 2010)."
ReadBright Phonics Program (used for additional practice)	<a href="#">ReadBright Science of Reading Program Guide</a> The book, <i>Explicit Instruction</i> , by Anita Archer describes the importance of practice in the Gradual Release of Responsibility Model of instruction.
ReadBright Phonological Awareness Program	<a href="#">Phonological Awareness: Instructional and Assessment Guidelines</a>
Explicit Vocabulary Building Routine	<i>Bringing Words to Life</i> by Isabel Beck <i>Explicit Instruction</i> , by Anita Archer
Sound Wall Instruction through Tools4Reading materials	<i>Speech to Print</i> by Dr. Louisa Moats  Wise, B. W., Ring, J., & Olson, R. K. (1999). Training Phonological Awareness with and without Explicit Attention to Articulation. <i>Journal of Experimental Child Psychology</i> , 72(4), 271–304. <a href="https://doi.org/10.1006/jecp.1999.2490">https://doi.org/10.1006/jecp.1999.2490</a>  Castiglioni-Spalten, M. L., & Ehri, L. C. (2003). Phonemic Awareness Instruction: Contribution of Articulatory Segmentation to Novice Beginners' Reading and Spelling. <i>Scientific Studies of Reading</i> , 7(1), 25–52. <a href="#">Phonemic Awareness Instruction: Contribution of Articulatory Segmentation to Novice Beginners' Reading and Spelling</a>  Boyer, N., & Ehri, L. C. (2011). Contribution of phonemic segmentation instruction with letters and articulation pictures to word reading and spelling in beginners. <i>Scientific Studies of Reading</i> , 15(5), 440–470. <a href="#">Contribution of Phonemic Segmentation Instruction With Letters and Articulation Pictures to Word Reading and Spelling in Beginners</a>  Shanahan, t. (2022). <a href="#">Should We Build a (Word) Wall or Not?   Shanahan on Literacy.</a>
iReady Math Computerized Intervention	<a href="#">Stretch Growth: A Research-Backed Recovery Metric</a>
Daily Number Talks	<a href="#">Number Talks: Whole Number Computation</a>

Math Manipulatives/Concrete Models	
Small Group Instruction - Math	

<b>GRADES 3-8 Interventions for General Education &amp; Special Education Students</b>	<b>Supporting Evidence</b>
iReady Math Computerized Intervention	<a href="#"><u>Stretch Growth: A Research-Backed Recovery Metric</u></a>
Istation ELA Computerized Intervention	<a href="#"><u>Using Computer-Adaptive Curriculum to Increase Performance on NWEA MAP Growth Reading Outcomes</u></a>
Sonday System (Structured Multisensory Reading Intervention )	
Lexia Core 5	<a href="#"><u>Evidence for ESSA for Lexia Core 5</u></a>
CKLA Knowledge Building Curriculum	<i>The Knowledge Gap</i> by Natalie Wexler <a href="#"><u>CKLA EdReports</u></a>
Daily Number Talks	<a href="#"><u>Number Talks: Whole Number Computation</u></a>
Math Manipulatives/Concrete Models	
Small Group Instruction - English Language Arts & Math	

<b>GRADES 9-12 Interventions for General Education &amp; Special Education Students</b>
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After School Content Tutoring
Small group instruction - English Language Arts & Math
Sonday System (Structured Multisensory Reading Intervention )

<b>GRADES K-12 Interventions for BILINGUAL / ESL EDUCATION</b>	<b>Supporting Evidence</b>
Lexia English (K-8) Rosetta Stone (Grades 9-12)	<a href="#"><u>Lexia English White Paper</u></a>
Heggerty Phonological Awareness (K-1)	<a href="#"><u>Spanish Curriculum</u></a>  <a href="#"><u>Heggerty Phonemic Awareness Curriculum (2022-2023) Grades K-1 Efficacy Study Review</u></a>
Palabras a su paso (grades 3-6)	<a href="#"><u>Palabras a su paso</u></a>
iReady Math Espanol Computerized Intervention (K-6) ALEKS Spanish Computerized Math Program (Grades 7-12)	<a href="#"><u>Stretch Growth: A Research-Backed Recovery Metric</u></a>
mClass Lectura (K-6)	<a href="#"><u>The Importance of Dual Language Assessment in Early Literacy</u></a>  <i>“It’s incredibly important we attend to the Spanish language alongside English in assessment practices, to make sure we’re not underestimating the ability of a really significant percentage of our nation’s school population.”</i> –Dr. Lillian Durán Co-developer of mCLASS Lectura, Ph.D., Associate Dean for Academic Affairs, College of Education, University of Oregon

Estrellita, Lunita and Fugaces Phonics and Intervention Program (Grades K-4)	<a href="#"><u>Estrellita Methodology</u></a>
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**APPENDIX C: EXIT SURVEY FOR LAKEWOOD PUBLIC SCHOOLS**

TEACHER DATA

Exit Question	Yes	Percent	No	Percent
Do you feel like a valuable part of the District?	21	66%	11	34%
Do you feel you had all tools to succeed in your position?	19	59%	13	41%
Would you ever consider returning to Lakewood School District?	23	72%	9	28%
Would you recommend Lakewood School District to a friend looking for a job?	22	69%	10	31%