

## **STATE INTERVENTION PLAN FOR THE CAMDEN SCHOOL DISTRICT**

This intervention plan is served on the Camden school district as a proposed administrative order for full State intervention, pursuant to N.J.A.C. 6A:30-6.6 and -6.7.

### **Camden Superintendent**

Upon State intervention, the Commissioner of Education ("Commissioner") will recommend to the State Board of Education ("State Board") the appointment of a new State district Superintendent. The State district Superintendent will be appointed for an initial term that will not exceed three years and the costs of his or her salary will be borne by the Camden school district.

### **Highly Skilled Professionals**

The Commissioner plans to appoint a highly skilled professional pursuant to N.J.S.A. 18A:7A-14 to provide direct oversight in the Camden school district in the area of personnel. This highly skilled professional will, at a minimum, oversee the operations of the district in the area of personnel and spearhead a comprehensive audit of the district's personnel practices, including its policies and procedures to recruit, retain, induct, support, evaluate and grant tenure. He or she will also ensure the development and implementation of the district improvement plan in the area of personnel, attend all meetings of the Camden board, and obligate district funds for matters relating to the area of personnel management. This highly skilled professional will work with the newly appointed Superintendent, the Camden Advisory Board, and employees of the Camden district working in the area of personnel management.

The Commissioner also plans to maintain the services of a highly skilled professional assigned to the area of governance in the district. This highly skilled professional will continue to work with and attend meetings of the board of education.

The Commissioner plans to appoint a highly skilled professional to provide direct oversight of the district's special education office and special education services provided by the district.

The cost of the highly skilled professionals will be divided equally between the State and the Camden school district.

The Commissioner also intends to maintain the services of the existing State Monitor. The State Monitor will continue to be responsible for: directing all business office activities; overseeing budget development and implementation, including assessing the efficiency and necessity of appropriations and resources contained in the district budget and making all necessary reallocations and reductions to maintain a balanced budget; directing the operation and fiscal management of school district facilities; ensuring the development and implementation of an acceptable plan to address the fiscal deficiencies of the school district; and overseeing all district staffing with the ability to hire, promote and terminate employees. The State Monitor will attend all meetings of the Advisory Board and will not have authority to override actions by the State district Superintendent.

### Other District Leadership Positions

There has been an absence of effective leadership and management in the Camden school district that has precluded the delivery of consistently high-quality educational and support services throughout the district. Currently, there are a number of vacancies in key central office positions in the district. The Commissioner intends to abolish the positions of the Camden school district's chief school administrator and those executive administrators responsible for curriculum, business and finance, and personnel, including: Deputy Superintendent, Assistant Superintendent for Administration and Support Services, Assistant Superintendents for Curriculum and Instruction, Director of Human Resources, and Business Administrator. A new organizational structure will be instituted upon State intervention.

### Capital Project Control Board

The Commissioner will recommend to the State Board that it establish a Capital Project Control Board in the Camden school district, with the functions and powers set forth in N.J.S.A. 18A: 7A-46 et seq.

### Board of Education

Upon State intervention, and with State Board approval, the Commissioner intends to seek appointment of up to three additional members to the Camden Advisory Board.

### Improvement Plan

Pursuant to N.J.A.C. 6A:30-6.7, the attached New Jersey Quality Single Accountability Continuum ("NJQSAC") amended district improvement plan is hereby incorporated into this intervention plan.

## **Amended NJQSAC District Improvement Plan**

### **I. Introduction**

This Amended District Improvement Plan ("ADIP") is submitted pursuant to N.J.A.C. 6A:30-6.7(a) and will be developed further upon State intervention. Further development of this ADIP is necessitated by the Camden school district's ("District's") failure to provide an approved District Improvement Plan ("DIP") following the February 6, 2012 QSAC review and by the District's concurrent failure to demonstrate that it maintains the capacity necessary to create or implement an effective and approvable improvement plan.<sup>1</sup>

The District's lack of capacity to create and implement an improvement plan is evidenced by the fact that the DIP that was unofficially submitted by the District did not include any improvement strategies for 34 of the 97 indicators that the District failed in its QSAC review in Instruction and Program, Personnel, Operations, and Governance. Of those that were included, 17 were partial or incomplete. In addition, as outlined in the In-Depth Evaluation ("IDE"), submitted to the District on August 9, 2012, the persistent failure in the Camden school district over the past 30 years is not the result of an absence of improvement plans. Indeed, the IDE outlines multiple instances in which the New Jersey Department of Education ("Department") found the District deficient, including plans in the 1980s, the 1990s, and up to the district's 2007 QSAC review. In spite of those improvement plans and the technical assistance provided by the Department to implement those plans, Camden is nevertheless a district where less than one in five students are proficient on the New Jersey Assessment of Skills and Knowledge ("NJASK") in language arts literacy, where less than one in three students is proficient in math on the NJASK, and where less than one in two students that start ninth grade graduate four years later. Of those students that do graduate, only 25.6% graduate by passing the High School Proficiency Assessment ("HSPA"), the State's eleventh grade assessment. This means that only approximately 12.5% of students who begin ninth grade graduate by passing the HSPA four years later. The inescapable conclusion, therefore, is that the District needs assistance from the Department to effectively implement an improvement plan and make meaningful change in the educational future of Camden's more than 13,000 students.

Consequently, during full State intervention, a primary goal of the Department will be to build capacity within the District so that the District can successfully manage its own strategic plan at the conclusion of State intervention. Among other things, the Department will focus on both the District and school levels to ensure that the right people are in the right positions and that those

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<sup>1</sup> As stated in the Order to Show Cause accompanying this document, "The Interim District Superintendent submitted a DIP to the Department of Education on June 30, 2012, however, the DIP did not conform to the requirements of N.J.A.C. 6A:30-5.5 in that it had not been submitted to and approved by the Camden Board of Education."



individuals receive the support and training required for success. Therefore, this ADIP provides amendments to the provisional, unofficial and incomplete DIP submitted by the District on June 30, 2012, and is intended to serve as a starting point for the development of a more comprehensive improvement plan that completely addresses the District's failures.

## **II. Instruction and Program**

Camden scored a disappointingly low 9% in Instruction and Program, the District Performance Review ("DPR") that includes evidence of student outcomes.

Section A of Instruction and Program focuses on these student outcomes. In response to failing indicators that measure whether "[t]he district meets the current district definition of Adequate Yearly Progress (AYP)" in language arts literacy and math (A1, A2), the District's improvement plan simply reads:

- "By January 2013, guidelines will be developed to monitor progress and identify deficiencies in LAL and Math. Two trainings will be conducted for schoolwide administrators."

Similarly, in response to failing indicators that measure whether, "[w]hen comparing current and prior year assessment data for total students, the district shows one of the following: a. An increase in the prior year's percentage of students that achieved proficiency (proficient plus advanced proficient) of at least five percentage points. OR b. At least 95% of the total student population achieves proficiency (proficient plus advanced proficient)" in math and language arts literacy (A3, A5), the District's improvement plan reads:

- "Coaches and administrators will be trained in how to analyze and compare data and set realistic achievement goals."

The fundamental purpose of a school district is to ensure that students are learning. When faced with evidence to the contrary, a district's improvement strategy must vastly exceed a plan to develop guidelines to "monitor progress" and conduct "two trainings" for administrators. Instead, a holistic plan to improve student achievement must include, at a minimum: ensuring that the district curriculum is aligned to State standards and that it is delivered through high-quality instruction; ensuring that all schools have highly-effective educators delivering rigorous instruction with high expectations for all students through a comprehensive system to recruit, evaluate, retain, and support all educators through sustained professional development; utilizing data to drive instruction and intervene when students fall behind; and developing a range of instructional strategies that meet all students where they are. Beyond this, the plan must also include, at a minimum: a strategy to focus on ensuring that all students are receiving early

learning opportunities; a focus on special education students that ensures they receive a quality educational program taught by individuals with a skill-set that correlates to the subject matter taught and who can differentiate instruction according to the needs of students on all levels; a safe and secure learning environment for all students; a strategy to address the physical, social, and emotional well-being of students; an outreach strategy to ensure that the community and families are engaged in their children's education; and a strategy to develop a high-functioning central office that supports schools and principals as instructional leaders and provides educators and students with the resources needed to be successful.

Because the instructional program component of QSAC begins with an aligned and high-quality curriculum, a major finding from the QSAC review was that the District did not have an approved or aligned curriculum in all of the nine curriculum areas – for example, United States History II was in draft form, Global Studies dated twenty years ago, and World Languages was never created (B1 and related in B2, B3, B4, B5, B6, B7, B8). In response to failing these indicators, the District proposed a short-term strategy to:

- “Acquire CBOE adoption of revised curriculum aligned to the NJCCCS (2009) for the following curriculum: Health and Physical Education curriculum P-12;” and to
- “Acquire CBOE adoption of revised curriculum aligned to the NJCCCS (2009) for the following curriculum: Revised 2010: Social Studies Curriculum in Grades 6-8 & Grade 10-United States History I. Revised 2011: Grade 11 United States History II and Grade 9- Global Studies 2. To align/update all Social Studies elective curriculum to the NJCCCS (2009) and update all Social Studies curriculum to the Common Core state standards for Literacy in History/ Social Studies.”

The District also includes a series of broader long term strategies, such as:

- “Vertical and horizontal articulation within the curriculum and instruction department. K-12 when writing curriculum in all areas. Include bilingual and special services department on each team. K-12 language arts literacy, K-12 math, K-12 physical education and fine arts, etc. Implement an interdisciplinary approach when revising curriculum that includes the integration of 21<sup>st</sup> century skills, technology, and global perspectives.”

The IDE found that, because of the lack of aligned curricula and leadership from the District, schools were piloting a “myriad of vendor-driven programs without coordination across curricular areas” and without regard to a student’s “natural progression from grade level to grade level.” Therefore, a complete and immediate review of *all* curricula is required, not simply in those areas listed above. This must include not only ensuring that all curricula are aligned to

State standards but also an immediate end to the use of individual, vendor-driven programs in schools that are not approved by the District and aligned across curricular areas.

Section C of Instruction and Program focuses on the instruction of the New Jersey Core Curriculum Content Areas. Because the IDE found that instruction in the District is “often teacher led and focused on simple rote strategies, such as questions with one-word answers,” the type of professional development required far exceeds that outlined in the DIP. This includes support around setting high expectations for all students, executing effective instructional strategies, using assessment data to drive or differentiate instruction, and the formation of professional learning communities in every school.

With regard to feedback from supervisors, the district writes:

- “Building and district administrators will provide meaningful feedback to teachers on a regular basis in reference to their lesson plans and aligning them to the CCCs. Administrators will conduct daily focused walk-throughs and examine lesson plans on a weekly basis.”

As outlined in the TEACHNJ Act and the regulations proposed by the Department to implement the law, the cycle of feedback must be incorporated into the evaluation process to ensure educators are receiving timely and meaningful feedback throughout the year.

The District failed to include a plan in Section D related to the lack of a program for gifted and talented students and so we are unable to amend those strategies.

Similar to Section A, Section F outlines high school graduation attainment. Because the District’s graduation rate in the 2011-12 school year dropped from 57% to 49%, this is a significant concern, further complicated by the fact that only 25.6% of students who did graduate passed the HSPA. The District’s strategy in response to failing these indicators simply reads:

- “Appropriately code all transferring students in Genesis, student data system; Provide students and keep a copy of the NJDOE Student Transfer Card; Each school must keep a Transfer In/Out Log Book; Properly code all student deaths.”

The causes of this low graduation rate far exceed problems with coding students in data systems, but speak to larger district-wide failures. An amended strategy must include all of those listed in Section A, as well as a comprehensive plan for the high concentration of special education students in high school and a program to identify students at risk of dropping out of high school, which would include a dedicated referral and intervention system for those students.



### III. Personnel

A high-performing Human Resources division does not focus on a simple execution of operational functions, but instead has a relentless focus on recruiting talent, ensuring that the right people are in the right positions, ensuring that all staff are annually evaluated, ensuring that high-performing staff are retained and rewarded while low-performing staff are exited, and ensuring that all staff receive support and professional development opportunities.

As outlined in the IDE and in evidence provided by the District, this is not occurring in Camden. The IDE found that staff were “routinely rotated from school to school,” and that staff often do not possess the skill set for their new assignment. For example, a principal was assigned to a school with more than 40% special education students but did not have a background in educating students with special needs; an administrator assigned to a bilingual school did not have any experience working with bilingual students; and one community liaison charged with outreach to Spanish-speaking families did not speak Spanish.

A report commissioned by the Camden Board of Education and conducted by UPD Consulting found similar problems. That report found that the District has had 13 permanent or acting directors of HR in the last 17 years. As told to the Department by Camden staff, the District currently has no process to track or analyze annual evaluations of school staff, meaning the District as a whole has no way to identify its strong performers or weak performers or to make decisions based on those quality considerations.

The District has failed a number of indicators in Section A of Personnel, such as those that require all staff to be “employed in state-recognized titles appropriate for their job responsibilities” (A2b) and that “the district identifies leadership and staffing issues in low-performing districts.” (A3b)

In response to those indicators, the District outlined a series of incremental steps to address those areas. For example, in response to failing A3b, the district wrote:

- “All administrator certification status is monitored by HR department; Administrators in Leader-to Leader program are contacted frequently for status updates; HR department will enroll administrators in Leader-to-Leader program; Principals at Morgan Village and Hatch received standard certificates and were mentored.”

Given the severity of the problem identified in the IDE, more than incremental changes are required. Rather, as the IDE outlined: “Given the dramatic mismatch between student outcomes and performance evaluations, the data collected through the in-depth interviews, the district’s Personnel QSAC scores, the district should undergo a comprehensive audit and retooling of its

personnel practices, including its policies and procedures to recruit, induct, evaluate, develop, retain, and separate educators.”

Section C of Personnel outlines professional development, which is a crucial component of helping all educators continuously improve their practice. In response to failing the indicator that reads “[t]he district provides high-quality professional development activities to all teachers, based on teacher needs regarding improvement in the core academic areas as defined by NCLB (Title IIA). Professional development activities for all teaching staff members, including teachers of students with disabilities and teachers of ELLs, are aligned to the NJCCCS” (C1c),” the district wrote:

- “Issue: PD is provided but not sustained or any follow-up in successive years. Frequent turnover of PD initiatives. Action: 1. Survey teachers regarding their individual needs (building administrators should have data from formal evaluations of teachers and school climate survey). 2. A combination of this data will guide decisions on developing professional development training. Training sessions will extend throughout the school year and become a part of the PD calendar. 3. Based on past evaluations and information provided by our district schools, Camden City Public schools in collaboration with several departments (PD, C&I, Data, Bilingual/ESL, Special Services etc.) provide a variety of formal and informal opportunities for continuous professional growth. This allows our staff to keep current with learning effective strategies during the school year. This includes, but not limited to monthly PD activities, novice teacher workshops, classroom walkthroughs, Saturday academies and Summer PD Institutes.”

Again, what is required is not a slight modification to do “more” of the same process, but a complete redesign of professional development. Among many other things, this should include creating a professional learning curriculum that outlines a scope and sequence of skills teachers should obtain at three differentiated levels of teaching (novice, intermediate, and expert teachers); aligning evaluation cycles to the professional development cycles, which would create “school score cards” for the District to identify areas of concern and potential focus areas for future intervention/support in the school site and also give the District insight on the performance of each individual teacher throughout the year; building a platform for online instructional support that aligns professional development sessions provided with exemplars in each area; and developing professional learning communities that meet for structured professional development sessions throughout the course of the academic week.

#### **IV. Operations Management**

While the DPR for Operations is narrowly focused on limited areas, the District needs significant reform to improve its operational capacity and to develop a high-functioning central office, as



outlined in the IDE. The IDE found that the “lack of coordination amongst central office departments and divisions hampers even the most basic district functions.” For example, the IDE cites the lack of coordination between school buildings, purchasing, procurement, and the business office with regard to the provision of school supplies. The IDE notes “schools without textbooks, other schools with an abundance of textbooks and laptops for each teacher, pallets of textbooks and materials that were still shrink-wrapped in March, and new computer equipment that had yet to be unpacked.” To address those problems, the central office requires a reorganization and alignment of responsibilities to execute its core functions.

One section in the DPR focuses on School Safety and Security (Section C). Though the District failed to provide improvement strategies in several areas that relate to the reporting of violence, vandalism, and substance abuse in the schools (C2a, C2b, C2c), the Department investigated the District’s failure of those areas and outlined its findings in a February 2012 report. In 2011-12, the District reported 35 total incidents of violence and vandalism in the schools, but police responded to 308 incidents during that time, as identified in a newspaper article. After a thorough investigation, the Department found that the District did not have procedures in place to report or collect these incidents, and outlined a series of corrective actions such as training of staff in reportable EVVRS incidents; recommended using a universal form in all schools to consistently track data (sample forms were provided by Department that the district could adapt for its use); and suggested conducting an analysis of EVVRS data to determine a need for the implementation of intervention strategies and supports. The district must continue to implement those procedures.

The District also failed to submit an improvement strategy for the following indicator: “The average daily attendance (ADA) rate for each district averages 90 percent or higher as calculated for the three years prior to the completion of the DPR. (N.J.A.C. 6A:32-13.1)” (C5b). Student attendance is a requirement for student learning, and the district must undertake an immediate review of the causes of such high student absences and launch an initiative to increase attendance.

## **V. Governance**

One of the most significant deficiencies in the IDE focused on Governance. The IDE found that “the [Board of Education] has failed to collaboratively establish a vision for the school system amongst all stakeholders that drives and shapes system-wide behaviors.” The IDE also found that the Board is “widely perceived as acting outside of its prescribed roles” in a number of areas.

The UPD Consulting report, commissioned by the Board, found very similar findings: “The Board at times has resorted to subverting the chain of command and otherwise publicly

undermining the administration...Instead, the Board has become mired in day-to-day operations of the district at the expense of developing strategies to address systemic challenges and to hold administrators accountable for results.”

The DIP does not address several severe deficiencies noted in the QSAC review. For example, no plan exists for failure of the following indicators: “Each member of the school board or advisory board confines his or her board action to policy making, planning, and appraisal. (N.J.S.A. 18A:12-24.1(c))” (E2); “Individual board and advisory board members recognize that authority rests with the Board of Education and do not make personal promises or take any private action that may compromise the board. (N.J.S.A.18A:12-24.1(e))” (E4); and “The school board or advisory board maintains the confidentiality of all matters pertaining to the schools which, if disclosed, would needlessly injure individuals or the schools. N.J.S.A. 18A:12-24.1(g)” (I2).

In other areas, the District does not assert a defined path to improvement but instead simply asserts that all board members have signed a code of ethics. For example, in response to the following failed indicator: “The school board or advisory board refers all complaints to the CSA and acts on the complaints at public meetings only after failure of an administrative solution” (G5), the District’s improvement plan reads:

- “School board or advisory board members refers all complaints to the CSA and acts on the complaints at public meetings only after failure of an administrative solution. The code of ethics was read and all school board members signed the ‘code of Ethics for School Board Members’ at the district’s reorganization meeting May 16, 2012.”

In response to failing the indicator: “School board or advisory board members carry out their responsibility not to administer the schools, but together as a whole, the board ensures the schools are well run. (N.J.S.A. 18A:12-24.1(d))” (G6), the District’s improvement plan reads:

- “School board or advisory board members carry out their responsibility not to administer the schools, but together as a whole, the board ensures the schools are well run. The code of ethics was read and all school board members signed the ‘code of Ethics for School Board Members’ at the district’s reorganization meeting May 16, 2012.”

The governance structure of Camden is deeply broken and needs complete reorganization. Among other plans, this must include an ownership by the Board and District leadership of the severity of the problems outlined in the IDE, and must include sustained professional development and support to ensure that the Board provides the leadership necessary to turn around persistent academic failure in Camden.

## **VI. Finance**

Under the leadership of the State Monitor, the District's QSAC score in the Fiscal component has increased from 31% in 2007 to 79% in 2012. Out of nearly 90 indicators, the District failed only 4 indicators in the 2012 review.

While great progress has been made, the District needs to continue to build internal capacity and continue to make progress in establishing procedures and protocols. This involves hiring an experienced Business Administrator with a track record in urban school districts. In addition, staff in the Business Administrator's office must ensure that they are following Standard Operating Procedures ("SOPs") in all areas. For example, although the business office has implemented SOPs, including procedures not to honor any purchase requests without an approved Purchase Order ("PO"), staff continue to violate the SOPs and approval process by directly ordering from vendors prior to obtaining an approved PO.

In addition, the office must continue to focus on the following three priorities:

1. While the business office has improved in regard to legal compliance, it needs significant improvement in performing efficiently and using sound judgment and generally accepted business principles when resolving non-routine matters.
2. The budget process needs to include a programmatic and student needs assessment component to efficiently determine the cost of operating the district effectively and to align the budget with the district's educational goals and priorities.
3. Monthly financial reports need to be completed in a timely fashion and processes and procedures need to be implemented that will ensure the accuracy of financial data. For example, the failure to complete timely financial reports resulted in the submission of the audited Comprehensive Annual Financial Report for 2011-12 three months after the statutory due date.

## **VII. Conclusion**

For the reasons set forth herein, the Department recommends a holistic development of a more comprehensive ADIP by the Department and the District upon full State intervention.