

JEFFREY S. CHIESA
Attorney General of New Jersey
Attorney for Commissioner of Education
Richard J. Hughes Justice Complex
P.O. Box 112
Trenton, New Jersey 08625

By: Michelle Lyn Miller
Assistant Attorney General

STATE OF NEW JERSEY
COMMISSIONER OF EDUCATION

IN THE MATTER OF THE	)	Agency Docket No.
CAMDEN CITY SCHOOL DISTRICT,	)	
CAMDEN COUNTY	)	
	)	<u>ORDER TO SHOW CAUSE</u>
	)	

PLEASE TAKE NOTICE that, pursuant to N.J.S.A. 18A:7A-15, the Commissioner of the New Jersey Department of Education ("Commissioner") hereby Orders the Camden City School District to Show Cause why an Administrative Order placing the Camden City School District ("Camden" or "District") under full State intervention should not be implemented based on the existence of the following circumstances:

1. The educational metrics garnered from the performance results of Camden demonstrate an unfortunate and unacceptable educational failure on the part of the Camden School District. The District lags far behind the State average for performance in all critical areas of education. Camden has consistently ranked at the bottom of school districts within the State on year-end assessments

for the last several years. For example, while 65.9% of students across the State passed the Language Arts Literacy portion of the New Jersey Assessment of Skills and Knowledge ("NJASK") exam in the 2011-12 school year, just 19% of the Camden students passed, meaning less than one in five Camden students can read on grade level as measured by the NJASK. Priority Schools were defined by the Department of Education ("Department") in April 2012 as the seventy-five schools with the lowest proficiency in the State. Twenty-three of Camden's twenty-six schools are rated as Priority Schools. Stated differently, while Camden's schools make up approximately 1% of the schools in the State, they account for 33% of the lowest performing schools. This includes the three absolute lowest-performing schools in the State; eight of the ten absolute lowest-performing schools in the State; and fourteen of the twenty-one absolute lowest-performing schools in the State, based on overall proficiency rates, as identified in the State's No Child Left Behind waiver application. In the 2011-12 school year, while the State graduation rate was 86%, the graduation rate for Camden was 49%, meaning that less than half the students who entered the District in ninth grade graduated in four years. Moreover, only 2% of Camden's students indicate college readiness as determined by the College Board. Comprehensive review of the District pursuant to the New Jersey Quality Single Accountability Continuum Act ("New Jersey's QSAC"), N.J.S.A. 18A:7A-10 et seq. reveals a pervasive

educational failure. Both the Camden Board of Education and its administration have failed to implement proper policies and provide personnel to adequately educate the children of Camden. Because of these glaring and ongoing failures to properly educate the youth of Camden, the Department must immediately engage in full State intervention of the failing Camden School District pursuant to N.J.S.A. 18A:7A-10 et seq. to raise the level of educational attainment to acceptable levels.

Initial Comprehensive QSAC Review

2. It is the constitutional obligation of the Legislature to provide all children in New Jersey with a thorough and efficient system of free public schools. N.J.S.A. 18A:7A-14a. Pursuant to New Jersey's QSAC, the Department evaluated the thoroughness and efficiency of the District as mandated by N.J.S.A. 18A:7A-14a. The Department evaluated the District based upon a District Performance Review ("DPR") consisting of quality performance indicators for each of five key components of school district effectiveness. The DPR for each of the five key components is scored out of 100% satisfaction of the indicators, with a score of 80% or more being satisfactory and warranting no intervention by the Department. It is the responsibility of the State to insure a remedy without delay whenever a district is shown to be deficient in one or more of the key components. See N.J.S.A. 18A:7A-14a.

3. The Department's initial QSAC review of the District revealed pervasive deficiencies in Instruction and Program, Operations Management, Personnel, and Governance. In each of these areas, Camden's scores failed to meet the minimal requirements.

4. By letter dated February 6, 2012 (hereinafter "February 6th Letter"), the Department issued an evaluation of the District wherein the District received placement scores well below the acceptable range of 80-100% of the weighted quality performance indicators in four of five components as follows:

Instruction and Program	7%
Operations Management	47%
Personnel	9%
Governance	33%

(Exhibit A, Exhibit B).

5. Specifically, in Instruction and Program, the District failed to satisfy the indicators of A1, A2, A3, A5, A6, A7, A8a, A8b, A8e, A10a, A11a, A12a, A12b, A12c, A12d, A12e, B1, B2, B3, B4, B5, B6, B7, B8, C1a, C1b, C1c, C1d, C2, C3, C4, C5a, C5c, C5d, C5e, C6a, C6b, C6c, C6d, C7a, C7b, C8, D1d, D3a, D3b, D3c, D3d, F1a, F2a, F2b, F4a, F4b, F4c, F4d, F4e, F5, and F6. (Exhibit B).

6. In Personnel, the District failed to satisfy the indicators of A1e, A2a, A2b, A3a, A3b, A4d, B1b, B6a, C1b, C1c, C1e, C1h, C2, C3c, C4b, C4d, C4e, C5c, and C5d. (Exhibit B).

7. In Operations Management, the District failed to satisfy the indicators of A2b, A3b, B2c, C1d, C2a, C2b, C2c, C2d, C4, C5b, C10, C11, D5, E1d, E3b, E4a, E4b, E4c, E4d, E4e, E5, E6, and E7. (Exhibit B).

8. In Governance, the District failed to satisfy the indicators of A2, B4, E2, E4, F2, F8, G5, G6, and I2. (Exhibit B).

9. In Fiscal Management, the District failed to satisfy the indicators of B4j, C2b, and C2c. (Exhibit B).

10. In the key component of Fiscal Management, the District received a placement score of 79%. However, since December 2006, a State-appointed fiscal monitor has been assigned to the District by the Department because it was determined that the District met the criteria for the intervention as set forth in N.J.S.A. 18A:7A-55. The District's achievement in this component is due largely to the capacity added by the State-appointed fiscal monitor. (Exhibit A, Exhibit B).

11. The District's self-assessment portion of the QSAC review showed much higher scores, indicating that the District does not have a true understanding of their own performance.

	District self-evaluated score	Final QSAC score
Instruction and Program	61%	9%
Fiscal Management	78%	79%
Operations Management	98%	47%
Personnel	100%	19%
Governance	67%	33%

(Exhibit A, Exhibit B, Exhibit E).

Department's In-depth Evaluation of the District

12. The February 6th Letter informed the District that the Department would mobilize a team to conduct an In-depth Evaluation ("IDE") pursuant to N.J.A.C. 6A:30-5.3. (Exhibit A).

13. Commencing February 14, 2012, a team from the Department conducted an IDE in accordance with N.J.A.C. 6A:30-5.3. The IDE included extensive review of documents, on-site school visits, and interviews of central office administration, District supervisors and support staff, school administrators, counselors, teachers, and students. The IDE team also held a community forum, gathering input from community stakeholders, including a survey of attendees. (Exhibit H).

14. On August 9, 2012, the Department transmitted the IDE to the District. (Exhibit G).

15. The Department's IDE confirmed severe deficiencies in Camden's educational program ranging from unacceptably low student performance and mismanagement to lack of leadership. (Exhibit H).

16. The IDE found that the District required fundamental and transformational reform if it was to provide the children of Camden with a high-quality education and the opportunity to graduate from high school prepared for college or a career. Areas of deficiency found during the IDE included:

a. A consistent trend of low student performance over time when compared to similar schools or districts and student demographic subgroups, and below average proficiency rates on the State-wide assessments, which compared poorly against other districts within its District Factor Group ("DFG").

i. A graduation rate that was 56.9%, compared to the State's overall rate of 83.2%.

ii. Of the students who failed to graduate in 4 years, 33.4% dropped out entirely.

iii. During the 2010-11 school year, just 51% of the senior class took the Scholastic Aptitude Test ("SAT").

iv. Based on the scores of those students taking the SAT, less than 1% of District students indicate college-readiness as determined by the College Board, as compared to 43.2% of students State-wide and 10.7% of students within Camden's DFG (Camden is in DFG A -- the lowest socio-economic grouping in the State).

v. During the 2009-10 school year, only 53 of the 1,041 students in the junior and senior classes took one or more AP exams.

vi. During the 2010-11 school year, a mere 19.6% of students were proficient in Language Arts Literacy and only 28% were proficient in Math on the NJASK. This

places Camden 46.9 percentage points below the State average in Language Arts Literacy and 47.5 percentage points below the State average in Math. This also placed Camden well below the proficiency average for DFG A.

b. The District as a whole exhibits a lack of leadership and mismanagement.

- i. Leadership was inconsistent and not effective.
- ii. Central office administrators failed to coordinate and align functions among individual schools.
- iii. The District Board of Education did not execute its duties effectively.
- iv. District administrators were rotated from school to school and without the appropriate skill set for the new assignment. This includes principals and administrators assigned to schools with a special education or bilingual focus without a background in these areas.
- v. There was a lack of coordination between the District and individual schools to distribute books, supplies, and other education materials necessary to offer a high-quality education.
- vi. The District did not effectively implement improvement plans.

c. The District did not provide an effective educational program.

i. The District did not adopt or implement district-wide curricula in all of the nine State-specified areas.

ii. Due to a lack of central office leadership, schools within the District made independent instructional program decisions, which caused a lack of educational continuity through grade levels.

iii. Schools and classrooms piloted a myriad of vendor-driven programs that were not aligned to each other or across curricular areas.

iv. School staffing was inconsistent and haphazard. Additionally, the District mismanaged teacher vacancies leading to an overuse of substitute teachers in many classes.

v. The District failed to provide student support services that were appropriate to individual students or required by State and/or federal regulations.

(Exhibit G, Exhibit H).

District's Application for Reconsideration

17. The Department's February 6th Letter informed the District that pursuant to N.J.A.C. 6A:30-4.1(f), the District had seven days to submit a written reconsideration request if the

District believed that an indicator was scored incorrectly. (Exhibit A).

18. By letter dated February 9, 2012, the District requested that the Department reconsider its QSAC scores in Instruction and Program, Personnel, and Operations Management, and several indicators in Governance. (Exhibit C).

19. In the key component of Instruction and Program, the District sought reconsideration of DPR indicators A8a, A8b, A8e, A10a, A11a, A12a, A12b, A12c, A12d, A12e, B1, B2, B3, B6, B7, B8, C1d, C2, C3, C4, C5a, C5c, C5d, C5e, C6a, C6b, C6c, C6d, C7a, C8, D1d, F2b, F4a, F4b, F4c, F4d, F43, F4e, F5, and F6. (Exhibit D).

20. In the key component of Operations Management, the District sought reconsideration of DPR indicators A2b, A3b, B2c, C1d, C2, C2c, C2d, C4, C5b, C11, D5, E1d, E3b, E4a, E4b, E4c, E4d, E4e, E5, E6, and E7. (Exhibit D).

21. In the key component of Personnel, the District sought reconsideration of DPR indicators A1e, A2a, A2b, A3a, A3b, A4d, B1b, B6, C1b, C1c, C1e, C1h, C2, C3c, C4b, C4d, C4c, C5c, and C5d. (Exhibit D).

22. In the key component of Governance, the District sought reconsideration of DPR indicators A2, Bv4 [sic], and F8. (Exhibit D).

23. The District later submitted documentation for reconsideration of an additional four indicators. These were for

reconsideration of: Instruction and Program C1c, C7b, F2a and Personnel C4e.

24. By decision dated May 8, 2012 (hereinafter "Reconsideration Decision"), the Department informed the District that it reconsidered its February 6, 2012 decision and amended the District's QSAC scores for the areas of Instruction and Program and Personnel, but sustained the District's placement in the remaining areas. (Exhibit E).

25. Specifically, the Department found that the District submitted sufficient evidence to comply with the requirements in Instruction and Program, A11a and C8 and Personnel, B1b and C2. Due to this readjustment, the District had twelve points restored to its QSAC score. (Exhibit E).

26. Even with the adjusted scores, in each of the five key components of school district effectiveness, the District failed to satisfy 50% of the weighted quality performance indicators in four of five components as follows:

Instruction and Program	9%
Operations Management	47%
Personnel	19%
Governance	33%
Fiscal Management	79%

(Exhibit E, Exhibit F).

27. The District did not seek further review or appeal of the reconsideration decision with the Appellate Division of the Superior Court.

28. Intervention in the District is permitted by QSAC, N.J.S.A. 18A:7A-10 et seq., because even with the adjusted scores, less than 50% of the indicators in the key component areas of Instruction and Program, Operations Management, Personnel, and Governance were satisfied. (Exhibit F).

29. The Reconsideration Decision also advised the District that the Department's IDE was underway in the District and that the findings of that evaluation could differ from the results of the reconsideration determination. (Exhibit E).

30. The Reconsideration Decision additionally advised that the District needed to complete a District Improvement Plan ("DIP") and that it was due by June 1, 2012. (Exhibit E).

31. On May 22, 2012, the District Superintendent sought an extension of time to submit a DIP, until June 30, 2012, and that request was granted by the Executive County Superintendent on May 23, 2012.

32. 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.

Ongoing Failure Since the IDE

33. Since the IDE was issued in August 2012, the District's graduation rate for 2012 was calculated.

- a. In 2012, the State average graduation rate increased three percentage points to 86%; however, during that same time, Camden's graduation rate sunk 8 percentage points to 49%.
- b. At Camden High School, only 43% of students who started in ninth grade graduated four years later in the 2011-12 school year, and at Woodrow Wilson High School that number was only 46%.
- c. Of those students that did graduate, only 25.56% of students did so by passing both the Language Arts Literacy and Math sections of the High School Proficiency Assessment ("HSPA") after all attempts.

34. Since the IDE was issued in August 2012, the Department received the results of the District's 2012 administration of the State assessments, which demonstrated continued, pervasive failure on the NJASK in Math and Language Arts Literacy, and on the HSPA in Math and Language Arts Literacy.

- a. On the 2012 NJASK Language Arts Literacy assessment, 19% of third through eighth grade students in Camden tested as proficient -- approximately 47 percentage points below the State average.

- b. On the 2012 NJASK Math assessment, 30.4% of the third through eighth grade students tested as proficient -- approximately 45 percentage points below the State average.
- c. On the 2012 HSPA Language Arts Literacy assessment, only 61.7% of students tested as proficient -- approximately 30 percentage points below the State average.
- d. On the 2012 HSPA Math assessment, only 28% of students tested as proficient -- approximately 51 percentage points below the State average.

35. In 2011-12, only 2% of Camden students scored 1550 or higher on the SAT, the metric defined by the College Board as indicating a high likelihood of college success and completion. Nationally, 43% of students meet this metric and in New Jersey 43.5% meet this metric.

36. These academic outcomes are not the result of a lack of fiscal resources. In the 2011-12 school year, Camden spent \$23,709 per student, compared to the State-wide average of \$18,045. In addition, compared to the 106 other large K-12 school districts in the State, Camden had the lowest student/teacher ratio at 9.3 to 1 and the lowest administrator/student ratio at 88.8 to 1.

Full Intervention is Warranted in the District

37. The District's QSAC results, its failure to submit a DIP that was approved by the Board of Education, the findings of the

IDE, and the more recent findings of continued failure set forth above, individually and collectively, warrant immediate action by the Department to ensure that the public school district provides a thorough and efficient education to its students.

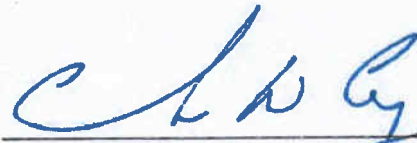
38. In a district with a State-appointed fiscal monitor, full intervention may be sought when the district satisfies less than 50% of the weighted quality performance indicators in the Instruction and Program, Operations and Management, Personnel, and Governance key components and at least one other factor delineated at N.J.A.C. 6A:30-6.2(b) is present.

WHEREFORE, because the Camden City School District failed to satisfy at least 50% of the weighted quality performance indicators in the Instruction and Program, Operations and Management, Personnel, and Governance key components of school district effectiveness; because the District is under the direct oversight of a State-appointed fiscal monitor appointed by the Commissioner; and because at least one of the factors set forth at N.J.A.C. 6A:30-6.2(b) is present;

The Commissioner hereby recommends that the New Jersey State Board of Education issue an Administrative Order placing the Camden City School District under full State intervention consistent with the full intervention plan developed by the Department and filed and served with this Order pursuant to N.J.S.A. 18A:7A-15, N.J.A.C. 6A:30-6.6, and N.J.A.C. 6A:30-6.7.

The Camden City School District is hereby accorded 20 days in which to respond to the within Order to Show Cause. Upon receipt of said response, the matter will be transmitted to the Office of Administrative Law for a plenary hearing to be held on an expedited basis and consistent with N.J.S.A. 18A:7A-15.

IT IS SO ORDERED this 22nd day of March 2013.

A handwritten signature in blue ink, appearing to read "C. Cerf", is written over a horizontal line.

Christopher Cerf
Commissioner of Education