



**Education Law Center**  
*Standing Up for Public School Children*

January 18, 2012

Christopher Cerf, Acting Commissioner  
NJ Department of Education  
P.O. Box 500  
Trenton, NJ 08625-0500

Re: In-Depth Evaluation of Camden Public Schools

Dear Mr. Cerf:

Education Law Center ("ELC"), as counsel in Abbott v. Burke, is responsible for ensuring the Department of Education ("DOE" or "State") provides children in the Camden City Public Schools ("Camden") with the programs, staff and services necessary to achieve the New Jersey Core Curriculum Content Standards ("CCCS") consistent with the Quality Single Accountability Continuum ("QSAC"), N.J.S.A. 18A:7A-1 et seq., and the Abbott rulings. On behalf of these school children, I write to bring to your immediate attention the State's failure to authorize an "in-depth evaluation" of the "performance and capacity" for Camden as a prerequisite to the development of an appropriate improvement plan by the State and Camden, as required by the QSAC law and regulations.

In 2007 and 2010, the State placed Camden on the QSAC continuum, which serves as the monitoring mechanism for New Jersey school districts. In the 2010 placement, the State established scores for Camden in the five required components of district effectiveness under QSAC as follows: 13% in Instruction and Program; 73% in Fiscal Management; 53% in Operations; 36% in Personnel; and 11% in Governance. See Letter from former Commissioner Bret Schundler to Camden Superintendent B. LeFra Young dated June 4, 2010. Thus, Camden scored below 50% on the quality performance indicators in three of the QSAC effectiveness components, Instruction and Program, Personnel and Governance.

Under the QSAC law, where a district "satisfies less than 50 percent of the quality performance indicators in four or fewer of the five key components of district effectiveness," the Commissioner "shall authorize an in-depth evaluation of the district's performance and capacity." N.J.S.A. 18A:7A-14c

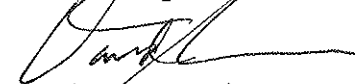
(emphasis added). This requirement is reiterated in DOE implementing regulations. N.J.A.C. 6A:30-5.3(a)1 (mandating DOE to conduct an in-depth evaluation where a district scores below 50% "in one or more" of the five QSAC effectiveness components). In addition, the DOE regulation sets forth detailed requirements for conducting the in-depth evaluation, N.J.A.C. 6A:30-5.3(b)-(j), and for developing a district improvement plan based on that evaluation. N.J.A.C. 6A:30-5.3(i) and 5.4.

Based on responses to requests filed under the Open Public Records Act, ELC has confirmed that an in-depth evaluation of Camden has neither been authorized nor conducted by the State, even though the district satisfied less than 50 percent of the quality performance indicators in three of the components of district effectiveness. The State, therefore, has not complied with the clear QSAC mandate that the identified deficiencies in Camden be addressed through an in-depth evaluation by persons with specific expertise in the deficient areas, the development of an appropriate improvement plan, provision of technical assistance, and other capacity-building supports based on the evaluation results.

Accordingly, we request that you promptly address this urgent matter by providing a detailed plan of action, including an expedited schedule, for conducting and completing the requisite in-depth evaluation of Camden, consistent with the QSAC law and regulation. Since it has been over 18 months since the State last placed Camden on the QSAC continuum, we request that you provide this plan no later than February 1, 2012.

Please contact me if you have any questions or would like to discuss this matter further. Since this urgent matter affects the opportunity for all Camden school children to achieve the CCCS, I anticipate your prompt response.

Sincerely,



David G. Sciarra  
Executive Director

cc: Dr. Ruben Mills, Acting Superintendent  
Ms. Susan Dunbar-Bey, Board Chair  
Senator Donald Norcross  
Assembly Member Whip Wilson  
Assembly Member Angel Fuentes