



State of New Jersey  
DEPARTMENT OF EDUCATION  
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Lt. Governor

KEVIN DEHMER  
Acting Commissioner

June 11, 2024

Ms. Jean Smith  
Commercial Township School District  
1308 North Avenue  
Port Norris, NJ 08349

**Re: Long-Range Facilities Plan, Major Amendment Approval**  
Commercial Township School District (0950), Cumberland County

Dear Ms. Smith:

The Department of Education (Department) has approved the major amendment to the Long-Range Facilities Plan (LRFP or Plan) submitted by the Commercial Township School District (District) pursuant to the Educational Facilities Construction and Financing Act, P.L. 2000, c. 72 (N.J.S.A. 18A: 7G-1 *et seq.*), as amended by P.L. 2007, c. 137 (Act), N.J.A.C. 6A:26 -1 *et seq.* (Educational Facilities Code), and the Facilities Efficiency Standards (FES). Findings are summarized in the attached "Summary of the Long-Range Facilities Plan, as Amended June 11, 2024."

The approved amendment fulfills LRFP reporting requirements for a period of five years from the date of this letter pursuant to N.J.S.A. 18A: 7G-4 (a) unless the LRFP needs to be further amended to address a proposed school facilities project that is inconsistent with the approved Plan. The approved LRFP amendment supersedes all prior LRFP approvals. Unless and until a new amendment is submitted to and approved by the Department pursuant to N.J.S.A. 18A:7G-4(c), this approved LRFP shall remain in effect. The approval of the LRFP does not imply approval of an individual school facilities project listed therein or its corresponding costs and eligibility for State support. Determination of preliminary eligible costs will be made at the time of the approval of a school facilities project pursuant to N.J.S.A. 18A:7G-5. Similarly, approval of the LRFP does not imply approval of portions of the Plan that are inconsistent with the FES or proposed building demolition or replacement.

Please email [LRFPsubmission@doe.nj.gov](mailto:LRFPsubmission@doe.nj.gov) with any questions you may have about the LRFP determination.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Kutner", with a long horizontal flourish extending to the right.

Susan Kutner  
Director, Office of School Facilities Planning  
Encl. Summary of the Long-Range Facilities Plan, as Amended June 11, 2024

c: Darren Harris, Commercial Township School District, Business Administrator  
Larry Merighi, District Consultant

**Commercial Township School District (0950)  
Summary of the Long-Range Facilities Plan, as Amended June 11, 2024**

The Department of Education (Department) has completed its review of the major amendment to the Long-Range Facilities Plan (LRFP or Plan) submitted by the Commercial Township School District (District) pursuant to the Educational Facilities Construction and Financing Act, P.L. 2000, c. 72 (N.J.S.A. 18A: 7G-1 *et seq.*), as amended by P.L. 2007, c. 137 (Act), N.J.A.C. 6A:26-1 *et seq.* (Educational Facilities Code), and the Facilities Efficiency Standards (FES).

The following provides a summary of the District’s approved amended LRFP. The summary is based on the standards set forth in the Act, the Educational Facilities Code, the FES, District-reported information in the Department’s LRFP reporting system, and supporting documentation. The referenced reports in *italic* text are standard reports available on the Department’s LRFP website.

**1. Inventory Overview**

The District is classified as a Regular Operating District (ROD) for funding purposes. It provides services for students in grades PK-8.

The District identified existing and proposed schools, sites, buildings, rooms, and site amenities in its LRFP. Table 1 lists the number of existing and proposed district schools, sites, and buildings. Detailed information can be found in the *School Asset Inventory Report* and the *Site Asset Inventory Report*.

**As directed by the Department, school facilities projects that have received initial approval by the Department and have been approved by the voters, if applicable, are represented as “existing” in the LRFP.** Approved projects that include new construction and/or the reconfiguration/reassignment of existing program space are as follows: n/a.

**Table 1: Number of Schools, School Buildings, and Sites**

Category	Existing	Proposed
Number of Schools (assigned DOE school code)	1	1
Number of School Buildings <sup>1</sup>	1	1
Number of Non-School Buildings <sup>2</sup>	1	1
Number of Vacant Buildings	1	1
Number of Sites	2	2

Based on the existing facilities inventory submitted by the District:

- Schools using leased buildings (short or long-term): n/a
- Schools using temporary classroom units (TCUs), excluding TCUs supporting construction: n/a
- Vacant/unassigned school buildings: Former Port Norris School building

<sup>1</sup> Includes district-owned buildings and long-term leases serving students in district-operated programs; Excludes storage and utility buildings.

<sup>2</sup> Includes occupied district-owned buildings not associated with a school, such as administrative buildings; Excludes small utility buildings.

**Findings:**

The Department has determined that the proposed inventory is adequate for approval of the District’s LRFP amendment. However, the LRFP determination does not imply approval of an individual school facilities project listed within the LRFP; the District must submit individual project applications for project approval.

**2. District Enrollments**

The District determined the number of students, or “proposed enrollments,” to be accommodated for LRFP planning purposes on a district-wide basis and in each school.

The Department minimally requires the submission of a standard cohort-survival projection using historic enrollment data from the Application for School State Aid (ASSA) or NJ Smart. The cohort-survival method projection method forecasts future students based upon the survival of the existing student population as it moves from grade to grade. A survival ratio of less than 1.00 indicates a loss of students, while a survival ratio of more than 1.00 indicates the class size is increasing. For example, if a survival ratio tracking first to second grade is computed to be 1.05, the grade size is increasing by 5% from one year to the next. The cohort-survival projection methodology works well for communities with stable demographic conditions. Atypical events impacting housing or enrollments, such as an economic downturn that halts new housing construction or the opening of a charter or private school, typically makes a cohort-survival projection less reliable.

**Proposed enrollments are based on a standard cohort-survival enrollment projection.**

Adequate supporting documentation was submitted to the Department to justify the proposed enrollments if an alternate methodology is proposed. Table 2 provides a comparison of existing and projected enrollments. All totals include special education students.

**Table 2: Enrollments**

<b>Grades</b>	<b>Existing Enrollments 2023-24</b>	<b>District Proposed Enrollments 2027-28</b>
PK (excl. private providers)	76	90
Grades K to 5	260	282
Grades 6 to 8	138	140
Grades 9 to 12	0	0
<b>Totals PK to 12</b>	<b>474</b>	<b>512</b>

**Findings:**

The Department has determined the District’s proposed enrollments to be acceptable for approval of the District’s LRFP amendment. The Department will require a current enrollment projection at the time an application for a school facilities project is submitted incorporating the District’s most recent enrollments in order to verify that the LRFP’s planned capacity is appropriate for the updated enrollments.

**3. District Practices Capacity**

Based on information provided in the room inventories, District Practices Capacity was calculated for each school building to determine whether adequate capacity is proposed for the projected enrollments based on

district scheduling and class size practices. The capacity totals assume instructional buildings can be fully utilized regardless of school sending areas, transportation, and other operational issues. The calculations only consider district-owned buildings and long-term leases; short term leases and temporary buildings are excluded. **A capacity utilization factor of 90% for classrooms serving grades K–8 and 85% for classrooms serving grades 9–12 is applied in accordance with the FES.** No capacity utilization factor is applied to preschool classrooms.

In certain cases, districts may achieve adequate District Practices Capacity to accommodate enrollments but provide inadequate square feet per student in accordance with the FES, resulting in educational adequacy issues and “Unhoused Students.” Unhoused students are considered in the “Functional Capacity” calculations used to determine potential State support for school facilities projects and are analyzed in Section 4.

Table 3 provides a summary of proposed enrollments and existing and proposed District-wide capacities. Detailed information can be found in the LRFP website reports titled *FES and District Practices Capacity Report, Existing Rooms Inventory Report, and Proposed Rooms Inventory Report*.

**Table 3: District Practices Capacity Analysis (including capacity utilization factors)**

<b>Grades</b>	<b>Proposed Enrollments</b>	<b>Existing District Practices Capacity</b>	<b>Existing Deviation*</b>	<b>Proposed District Practices Capacity</b>	<b>Proposed Deviation*</b>
Elementary (PK to 5)	372	343.16	-28.84	373.16	1.16
Middle (6 to 8)	140	140.44	0.44	140.44	0.44
High (9 to 12)	0	0.00	0.00	0.00	0.00
<b>District Totals</b>	<b>512</b>	<b>483.60</b>	<b>-28.40</b>	<b>513.60</b>	<b>1.60</b>

\* Positive numbers signify surplus capacity; negative numbers signify inadequate capacity. Negative values for District Practices capacity are acceptable for approval if the proposed enrollments do not exceed 100% capacity utilization.

**Considerations:**

- Based on the proposed enrollments and existing room inventories, the District is projected to have inadequate capacity for the following grade groups, assuming all school buildings can be fully utilized (100% capacity utilization): PK-5
- Adequate justification has been provided by the District if the proposed capacity for a school significantly deviates from the proposed enrollments. Generally, surplus capacity is acceptable for LRFP approval if additional capacity is not proposed through new construction.

**Findings:**

The Department has determined that proposed District capacity, in accordance with the proposed enrollments, is adequate for approval of the District’s LRFP amendment. The Department will require a current enrollment projection at the time an application for a school facilities project is submitted, incorporating the District’s most recent Fall Enrollment Report, in order to verify that the LRFP’s planned capacity meets the District’s updated enrollments.

#### 4. New Construction Funding Eligibility

*Functional Capacity* was calculated and compared to the proposed enrollments to provide a **preliminary estimate** of Unhoused Students and new construction funding eligibility. **Currently, all proposed enrollments, including district-proposed preschool projections, are considered eligible for funding. A final determination will be made at the time of project application approval.**

*Functional Capacity* is the adjusted gross square footage of a school building (*total gross square feet minus excluded space*) divided by the minimum area allowance per full-time equivalent student for the grade level contained therein. *Unhoused Students* is the number of students projected to be enrolled in the District that exceeds the Functional Capacity of the District’s schools pursuant to N.J.A.C. 6A:26-2.2(c). *Excluded Square Feet* includes (1) square footage exceeding the FES for any pre-kindergarten, kindergarten, general education, or self-contained special education classroom; (2) grossing factor square footage (*corridors, stairs, mechanical rooms, etc.*) that exceeds the FES allowance, and (3) square feet proposed to be demolished or discontinued from use. Excluded square feet may be revised during the review process for individual school facilities projects.

Table 4 provides a preliminary assessment of the Functional Capacity, Unhoused Students, and Estimated Maximum Approved Area for Unhoused Students for each FES grade group. The calculations exclude temporary facilities and short-term leased buildings. School buildings proposed for whole or partial demolition or reassignment to a non-school use are excluded from the calculations pending project application review. If a building is proposed to be reassigned to a different school, the square footage is applied to the proposed grades after reassignment. Buildings that are not assigned to a school are excluded from the calculations. Detailed information concerning the calculations can be found in the *Functional Capacity and Unhoused Students Report* and the *Excluded Square Footage Report*.

**Table 4: Estimated Maximum Approved Area for Unhoused Students**

Category	PK/K to 5	6 to 8	9 to 12	Total
PK-12 Proposed Enrollments	372	140	0	
FES Area Allowance (SF/student)	125.00	134.00	151.00	
<b>Prior to Completion of Proposed Work:</b>				
Existing Gross Square Feet	45,418	17,093	0	62,511
Adjusted Gross Square Feet	43,013	16,188	0	59,201
Adjusted Functional Capacity	344.10	127.00	0.00	
Unhoused Students	27.90	13.00	0.00	
Est. Max. Area for Unhoused Students	3,487.00	1,741.70	0.00	
<b>After Completion of Proposed Work:</b>				
Gross Square Feet	55,115	20,742	0	75,858
New Gross Square Feet	9,697	3,650	0	13,347
Adjusted Gross Square Feet	52,711	19,837	0	72,548
Functional Capacity	421.69	155.64	0.00	
Unhoused Students after Construction	0.00	0.00	0.00	
Est. Max. Area Remaining	0.00	0.00	0.00	

Facilities used for non-instructional or non-educational purposes are ineligible for State support under the Act. However, projects for such facilities shall be reviewed by the Department to determine whether they are consistent with the District's LRFP and whether the facility, if it is to house students (full or part time) conforms to educational adequacy requirements. These projects shall conform to all applicable statutes and regulations.

Estimated costs represented in the LRFP by the District are for capital planning purposes only. The estimates are not intended to represent preliminary eligible costs or final eligible costs of approved school facilities projects.

Considerations:

- The District does not have approved projects pending completion, as noted in Section 1, that impact the Functional Capacity calculations.
- The Functional Capacity calculations *exclude* square feet proposed for demolition or discontinuation for the following FES grade groups and school buildings pending a feasibility study and project review: n/a.
- Based on the preliminary assessment, the District has Unhoused Students prior to the completion of proposed work for the following FES grade groups: PK-5, 6-8.
- New construction is proposed for the following FES grade groups: PK-5, 6-8.
- Proposed new construction exceeds the estimated maximum area allowance for Unhoused Students prior to the completion of the proposed work for the following grade groups: PK-5, 6-8.
- The District, based on the preliminary LRFP assessment, will not have Unhoused Students after completion of the proposed LRFP work. If the District is projected to have Unhoused Students, adequate justification has been provided to confirm educational adequacy in accordance with Section 6 of this determination.

**Findings:**

Functional Capacity and Unhoused Students calculated in the LRFP are preliminary estimates. Preliminary Eligible Costs (PEC) and Final Eligible Costs (FEC) will be included in the review process for specific school facilities projects. A feasibility study undertaken by the District is required if building demolition or replacement is proposed per N.J.A.C. 6A:26-2.3(b)(10).

**5. Proposed Work**

The District assessed program space, capacity, and physical plant deficiencies to determine corrective actions. Capital maintenance, or “*system actions*,” address physical plant deficiencies due to operational, building code, and /or life cycle issues. Inventory changes, or “*inventory actions*,” add, alter, or eliminate sites, site amenities, buildings, and/or rooms.

The Act (N.J.S.A. 18A:7G-7b) provides that all school facilities shall be deemed suitable for rehabilitation unless a pre-construction evaluation undertaken by the District demonstrates to the satisfaction of the Commissioner that the structure might pose a risk to the safety of the occupants even after rehabilitation or that rehabilitation is not cost-effective. Pursuant to N.J.A.C. 6A:26-2.3(b)(10), the Commissioner may identify school facilities for which new construction is proposed in lieu of rehabilitation for which it appears from the information presented that new construction is justified, provided, however, that for such

school facilities so identified, the District must submit a feasibility study as part of the application for the specific school facilities project. The cost of each proposed building replacement is compared to the cost of additions or rehabilitation required to eliminate health and safety deficiencies and to achieve the District’s programmatic model.

Table 5 lists the scope of work proposed for each school based on the building(s) serving their student population. Proposed inventory changes are described in the LRFP website reports titled “*School Asset Inventory Report* and “*Proposed Room Inventory Report.*” Information concerning proposed systems work, or capital maintenance can be found in the "LRFP Systems Action Summary Report." (Work proposed for facilities that do not serve schools is not listed in the table and can be found in the *Site Asset Report.*)

With the completion of the proposed work, the following schools are proposed to be eliminated: n/a; the following schools are proposed to be added: n/a.

**Table 5: Proposed Scope of Work for School Buildings**

<b>Proposed Scope of Work</b>	<b>Applicable Schools</b>
<b>Renovation only</b> (no new construction)	
System actions only (no inventory actions)	n/a
Existing inventory actions only (no systems actions)	n/a
Systems and inventory changes	n/a
<b>New construction</b>	
Building addition only (no systems actions)	n/a
Renovation and building addition (system, existing inventory, and new construction actions)	Commercial Township School (025)
New building on existing site	n/a
New building on new or expanded site	n/a
<b>Site and building disposal</b> (in addition to above scopes)	
Partial building demolition	n/a
Whole building demolition	n/a
Site and building disposal or discontinuation of use	n/a

**Findings:**

The Department has determined that the proposed work is adequate for approval of the District’s LRFP amendment. However, Department approval of proposed work in the LRFP does not imply the District may proceed with a school facilities project. The District must submit individual project applications with cost estimates for Department project approval. Both school facilities project approval and other capital project review require consistency with the District’s approved LRFP.

**6. Proposed Room Inventories and the Facilities Efficiency Standards**

The District’s proposed school buildings were evaluated to assess general educational adequacy in terms of compliance with the FES area allowance pursuant to N.J.A.C. 6A:26-2.2 and 2.3.

District schools proposed to provide less square feet per student than the FES after the completion of proposed work as indicated in Table 5 are as follows: n/a

**Findings:**

The Department has determined that the District’s proposed room inventories are adequate for LRFP approval. If school(s) are proposed to provide less square feet per student than the FES area allowance, the District has provided justification indicating that the educational adequacy of the facility will not be adversely affected and has been granted an FES waiver by the Department pending project submission and review. This determination does not include an assessment of eligible square feet for State support, which will be determined at the time an application for a specific school facilities project is submitted to the Department. The Department will also confirm that a proposed school facilities project conforms with the proposed room inventory represented in the LRFP when an application for a specific school facilities project is submitted to the Department for review and approval.

**7. Other LRFP Amendment Considerations**

n/a