



State of New Jersey

DEPARTMENT OF EDUCATION

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Governor

SHEILA Y. OLIVER
Lt. Governor

KEVIN DEHMER
Interim Commissioner

July 10, 2020

Ms. Kristin Schell, Superintendent
Commercial Township School District
1308 North Avenue
Superintendent Address

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

Dear Ms. Schell:

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 July 10, 2020."

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 contact Richard Altringer , your Educational Facilities Specialist from the Office of School Facilities, at telephone number (609) 376-3665 or email at Richard.Altringer @doe.nj.gov, with any questions you may have.

Sincerely,

Susan Kutner
Director, Office of School Facilities Planning

SK: ra

Encl. Summary of the Long-Range Facilities Plan, as Amended July 10, 2020

c: Bernard E. Piaia, Jr., Department of Education, Office of School Facilities Projects
Richard Altringer, Department of Education, Office of School Facilities
Darren Harris, Commercial Township School District, Business Administrator

**Commercial Township School District (0950)
Summary of the Long-Range Facilities Plan, as Amended July 10, 2020**

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 ¹	1	1
Number of Non-School Buildings ²	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 Middle School building

¹ Includes district-owned buildings and long-term leases serving students in district-operated programs

² Includes occupied district-owned buildings not associated with a school, such as administrative buildings

Findings:

The Department has determined that the proposed inventory is adequate for approval of the District’s LRFPA amendment. However, the LRFPA determination does not imply approval of an individual school facilities project listed within the LRFPA; 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 LRFPA 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. Table 2 provides a comparison of existing and projected enrollments. All totals include special education students.

Table 2: Enrollments

Grades	Existing Enrollments 2019-20 School Year	District Proposed Enrollments 2024-25 School Year
PK (excl. private providers)	47	45
Grades K to 5	310	281
Grades 6 to 8	150	144
Grades 9 to 12	0	0
Totals K to 12	507	470

Findings:

The Department has determined the District’s proposed enrollments to be acceptable for approval of the District’s LRFPA 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 LRFPA’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

Grades	Proposed Enrollments	Existing District Practices Capacity	Existing Deviation*	Proposed District Practices Capacity	Proposed Deviation*
Elementary (PK to 5)	326	329.00	3.00	330.23	4.23
Middle (6 to 8)	144	111.10	-32.90	145.87	1.87
High (9 to 12)	0	0.00	0.00	0.00	0.00
District Totals	470	440.10	-29.90	476.10	6.10

** Positive numbers signify surplus capacity; negative numbers signify inadequate capacity. Negative values for District Practices capacity are acceptable for approval if 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: 6-8
- 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. **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. In addition, only preschool students eligible for state funding (former ECPA students) are included. 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
Eligible PK /K-12 Proposed Enrollments	326	144	0	
FES Area Allowance (SF/student)	125.00	134.00	151.00	
Prior to Completion of Proposed Work:				
Existing Gross Square Feet	40,904	18,068	0	58,973
Adjusted Gross Square Feet	39,708	17,540	0	57,248
Adjusted Functional Capacity	310.80	137.29	0.00	
Unhoused Students	15.20	6.71	0.00	
Est. Max. Area for Unhoused Students	1,899.05	899.27	0.00	
After Completion of Proposed Work:				
Gross Square Feet	50,310	22,223	0	72,533
New Gross Square Feet	9,405	4,155	0	13,560
Adjusted Gross Square Feet	49,113	21,694	0	70,808
Functional Capacity	384.43	169.81	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 (Port Norris Middle School building respresented as offline).
- 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."

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: School Building Scope of Work

Proposed Scope of Work	Applicable Schools
Renovation only (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
New construction	
Building addition only (no systems actions)	n/a
Renovation and building addition (system, existing inventory, and new construction actions)	Commercial Township PK-8 School (025)
New building on existing site	n/a
New building on new or expanded site	n/a
Site and building disposal (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