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OAL Dkt. No. EDU 02645-25  
Agency Dkt. No. 407-12/24

**New Jersey Commissioner of Education**  
**Final Decision**

Alyssa Danielle DeBlasis,

Petitioner,

v.

New Jersey Department of Education, State  
Board of Examiners,

Respondent.

The record of this matter and the Initial Decision of the Office of Administrative Law (OAL) have been reviewed and considered. The parties did not file exceptions.

In this matter, petitioner challenges the denial of her application for a Teacher of Elementary K-6 Certificate of Eligibility with Advanced Standing (CEAS). On November 1, 2024, the State Board of Examiners (Board) denied petitioner's application upon concluding that she "satisfied the requirements toward certification except for the completion of twenty-one and half (21.5) semester-hour credits in liberal arts" as is required by *N.J.A.C. 6A:9B-10.2(b)(2)*. The Board further concluded that petitioner's alternate education and experience, including teaching at a private school for two years, 9.5 instructional hours at Hillsdale College, and professional development seminars, was not equivalent to the credits deficiency and cannot be substituted for same because the Board is not permitted to waive certification requirements.

On appeal, petitioner contends that she graduated from Cabrini University, an accredited liberal arts college, with 129.5 credits and asks the Board to review her transcript again. The Board filed a motion to dismiss in lieu of answer, contending that petitioner failed to advance a cause of action that could entitle her to relief. The Board claims that petitioner's transcript only listed 38.5 liberal arts and/or science credits rather than the required 60 credits, and that her proposed alternative education and experience was not equivalent to 21.5 liberal arts and/or science credits.

Upon review of the petition and the brief in support of the Board's motion, the Administrative Law Judge (ALJ) granted the Board's motion to dismiss. The ALJ found and concluded "that the Board's denial is well supported by the record and is consistent with the law." Initial Decision, at 6. The ALJ agreed with the Board's reasoning that petitioner's alternative education and experience was not equivalent to 21.5 liberal arts credits. The ALJ did not make findings of fact related to petitioner's transcript other than "she was deficient in 21.5 semester hour credits in the liberal arts." Initial Decision, at 2.

Upon review, the Commissioner rejects the Initial Decision and remands the matter for further proceedings. Petitions are subject to dismissal "on the grounds that the petitioner has advanced no cause of action even if the petitioner's factual allegations are accepted as true." *N.J.A.C. 6A:3-1.10*. This standard also appears in *New Jersey Court Rule 4:6-2(e)*. See *Jonathan Wadley v. N.J. Dep't of Educ., Office of Student Prot.*, OAL Dkt. No. EDU 09223-22, Initial Decision at 4-5 (Mar. 10, 2023), *adopted*, Commissioner Decision No. 110-23 (Apr. 11, 2023) (assessing *N.J.A.C. 6A:3-1.10* motions like *Rule 4:6-2* motions seeking dismissal for failure to state a claim). Such motions are rarely granted and "must be evaluated in light of the legal sufficiency of the

facts alleged” in the petition. *Sickles v. Cabot Corp.*, 379 N.J. Super. 100, 106 (App. Div. 2005) (quoting *Donato v. Moldow*, 374 N.J. Super. 475, 482 (App. Div. 2005)). In other words, the petition must contain factual “allegations, which, if proven, would constitute a valid cause of action.” *Ibid.* (quoting *Leon v. Rite Aid Corp.*, 340 N.J. Super. 462, 472 (App. Div. 2001)).

In her petition, petitioner clearly alleges that she is a graduate of Cabrini University, an accredited liberal arts college, where she earned 129.5 credits as reflected on her transcript. If this allegation is accepted as true and viewed in the light most favorable to petitioner, then she has suggested a valid cause of action and can potentially prove that she earned the required 60 credits in liberal arts and/or science. She is not required to prove the allegation to survive a motion to dismiss at this preliminary stage in the proceedings.<sup>1</sup> *Printing Mart-Morristown v. Sharp Elecs. Corp.*, 116 N.J. 739, 746 (1989).

Accordingly, the Initial Decision is rejected, the Board’s motion to dismiss the petition is denied, and the matter is remanded to the OAL for further proceedings.

IT IS SO ORDERED.

  
COMMISSIONER OF EDUCATION

Date of Decision: September 12, 2025  
Date of Mailing: September 15, 2025

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<sup>1</sup> Petitioner’s transcript is not contained in the record, and the Board did not provide an explanation in its decision as to why it concluded that only 38.5 of petitioner’s credits from Cabrini University satisfy the liberal arts and/or science requirement. Thus, while the Board’s conclusion regarding the lack of equivalency between petitioner’s proposed alternate education and experience and the purportedly missing liberal arts credits might be correct, the Commissioner is unable to independently determine whether the Board’s decision to deny petitioner’s application for certification is consistent with the applicable statutory and regulatory provisions given the lack of information contained in the record. *Nimczyk v. N.J. State Bd. of Exam’rs*, Commissioner Decision No. 98-22 at 3 (May 16, 2022).



**State of New Jersey**  
OFFICE OF ADMINISTRATIVE LAW

**INITIAL DECISION**

OAL DKT. NO. EDU 02645-25

AGENCY DKT. NO. 407-12/24

**ALYSSA DANIELLE DEBLASIS,**

Petitioner,

v.

**NEW JERSEY DEPARTMENT OF  
EDUCATION, STATE BOARD**

**OF EXAMINERS,**

Respondent.

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**Alyssa DeBlasis**, petitioner, pro se

**Luke Hertzell-Lagonikos**, Deputy Attorney General, for respondent (Matthew J. Platkin, Attorney General of New Jersey, attorney)

Record Closed: April 9, 2025

Decided: July 25, 2025

BEFORE **IRENE JONES**, ALJ:

**STATEMENT OF THE CASE AND PROCERURAL HISTORY**

Petitioner, Alyssa Danielle DeBlasis, filed an application with the Commissioner of the State Board of Examiners seeking a Teacher of Elementary K-6 Certificate of Eligibility with Advanced Standing (CEAS). At its meeting on September 19, 2024, the

State Board of Examiners considered the application pursuant to N.J.A.C. 6A:9B-4.12 and under the requirements of N.J.A.C. 6A:9B-8.2 and N.J.A.C. 6A:9B-10.2. Petitioner was present at the meeting. The Board found that although petitioner satisfied some of the requirements for certification, she did not have twenty-one and half (21.5) semester hours of credits in liberal arts. In lieu of the credits, petitioner requested that the Board consider: her two years of teaching experience as a first grade teacher in a parochial school; 9.5 of instructional hours at Hillsdale College; and her completion of professional development seminars. Her request for a CEAS was denied. After the denial, petitioner, filed a pro se Petition of Appeal with the New Jersey Board of Education, State Board of Examiners on December 30, 2024. On January 29, 2025, the respondent, The Department of Education, State Board of Examiners filed a motion to dismiss in lieu of an Answer to the petition.

On February 3, 2025, the matter was transmitted to the Office of Administrative Law for a hearing as a contested case. Petitioner was allowed time to hire an attorney but eventually decided to proceed pro se and filed further pleadings. On April 8, the respondent advised that it would rely on brief filed in support of its motion to dismiss.

### **FINDINGS OF FACTS**

Based on the record, I **FIND** the following **FACTS** to be undisputed, thus they are adopted as the **FACTS** herein:

1. Petitioner is a 2022 graduate of Cabrini University. She graduated Cum Laude with a Bachelor of Science Education and a certificate in Special Education.
2. Petitioner has passed all seven praxis tests. In 2023, she applied to the State Department of Education for a Teacher of Elementary K-6 Certificate of Eligibility with Advanced Standing.
3. Her request was denied because she was deficient in 21.5 semester hour credits in the liberal arts.

4. Petitioner appeals the denial and requests recognition of her teaching experience and professional development seminars in lieu of the missing liberal arts credits.

### **ARGUMENT**

Petitioner asserts that she is absolutely qualified to receive a Teacher of Elementary K-6 Certificate of Eligibility with Advanced Standing because she attended a four (4) year accredited college where she earned a bachelor's degree in education, cum laude. Further, she is also certified in special education up to 12th grade. Moreover, the Liberal Arts College that she matriculated from had more stringent liberal arts requirements for graduation than that required by the New Jersey Department of Education. She contends that her "real-life" experience teaching to real students for the past three years should be counted in lieu of liberal arts credits.

In support of her position, petitioner points to the Teacher Apprenticeship Program that the Commissioner has implemented to help alleviate the State's teacher shortage. The program provides classroom aides and paraprofessionals with a streamlined path to become certified teachers based on their classroom experience. The denial here ignores her many years of classroom experience, her three years of field placement while in college and her student teaching where she was the lead teacher of a third-grade class. In all, she has served as a lead teacher for a total of three years, plus the one year having the lead teacher while student teaching. Her application is well supported with observations from administrators (her current principal) who have nothing but positive comments on her ability to run a classroom.

She concludes that it is extremely unreasonable for the Department of Education to require her to take another 21.5 liberal arts credits when New Jersey urgently needs educators.

In its motion to dismiss, respondent first notes that under N.J.S.A. 18A:6-38, it is tasked with the issuance and revocation of certificates "to teach or to administer, direct, or supervise the teaching, instruction, or educational guidance of . . . pupils in public schools operated by boards of education." In reviewing the Board's decision, the

Commissioner determines if the decision is consistent with the law. Travisano v. N.J. Dept of Educ., St. Bd. of Exam'rs, EDU 03126-22, Initial Decision (June 22, 2022), modified, Comm'r (Aug. 8, 2022). Under N.J.A.C. 6A:9B-10.2, a candidate seeking a Grades K-6 CEAS must: 1) comply with the certification requirements under N.J.A.C. 6A:9B-8 and -9, except for the requirement under N.J.A.C. 6A:9B-9.l(a)l; and 2) complete a liberal arts, science, dual- content, or interdisciplinary academic major or complete a minimum of 60 semester-hour credits in liberal arts and/or science, as documented on a transcript from an accredited college or university. See N.J.A.C. 6A:9B-10.2.

An applicant who receives an evaluation identifying areas of deficiency may provide evidence of alternative education or experience that the applicant believes equivalent to the areas of deficiency. See N.J.A.C. 6A:9B-4.12. Petitioner bears the burden of showing, by a preponderance of the evidence, that she is entitled to the certificate. Farrar v. N.J. St. Bd. of Exam'rs, EDU 13763-08, Initial Decision (Sept. 9, 2009), adopted, Comm'r (July 26, 2010) (citing In re Masiello, 25 N.J. 590 (1958)). Respondent argues that the Board cannot waive any requirements. Rather, the Board may, in its discretion, accept alternative education or experience if it determines such experience presents a one-to-one correspondence with the statutory requirements. IMO the App. of Lorraine George-Bittings, N.J. St. Bd. of Exam'rs, EDU 01448-15, Initial Decision (July 22, 2015), adopted, Comm'r (August 26, 2015). Here, the Board concluded that petitioner failed to satisfy N.J.A.C. 6A:9B-10.2(b)(2), which requires candidates to obtain 60 semester-hour liberal arts and/or science credits, because she had only 38.5 qualifying credits. Pursuant to N.J.A.C. 6A:9B-4.12, petitioner proffered two (2) years of experience as a first-grade teacher at Our Lady of Mount Carmel, 9.5 instructional hours at Hillsdale College, and four (4) professional development seminars as alternative experience to satisfy the deficiencies in her application. Respondent fully considered all information provided and determined petitioner's experiences were not equivalent to the 21.5 semester-hour liberal arts and/or science credits that she did not obtain. (Ex. A at 2.) This conclusion by the Board was well within its regulatory authority under N.J.A.C. 6A:9B-4.12. Ibid. The Board concluded "[g]iven the broad number of subjects this certification permits a holder to teach, a broad base in the liberal arts is necessary and [Respondent] cannot accept the offered experience as an equivalency (sic) to the lacking semester credit hours." Ibid.

Respondent notes that petitioner does not dispute that she failed to meet the 60 semester-hour liberal arts and/or science credits requirement. Rather, petitioner requests a “re-review” of her transcript as she feels that it, together with her proposed alternative education and experience, qualifies her to be a teacher. Petitioner argues that she has learned more from “actually (sic) teaching.” Ibid. However, petitioner has not provided any explanation as to how or why her alternative education and experience equals 21.5 liberal arts and/or science credits. Although petitioner provides documents regarding her teaching experience, instructional hours, and professional development seminars, she does not express how these factors satisfy the credit requirement. Petitioner has merely stated that these factors should be considered as suitable enough alternatives to grant her certification, but the petition contains no reasoning explaining why that is the case. In this appeal, petitioner has not proffered any additional education or experience that would represent a one-to-one correspondence with the liberal arts and/or science credit requirement under N.J.A.C. 6A:9B-10.2(b) (2). Nor has she alleged any facts that, if true, would render her experience equivalent to the 21.5 missing credits.

Respondent further rebuffs petitioner’s assertion that her experience should be considered as 21.5 credits so that she does not have to take out more student loans and her reference to the “Teacher Apprenticeship Program” as irrelevant to the issue at hand. Neither of these claims assert a valid cause of action, as they have nothing to do with the regulations at issue. Since petitioner fails to proffer any basis for relief, the petition should be dismissed. The Board has followed all regulations and statutes in finding petitioner’s experience insufficient to satisfy the liberal arts and/or science credit requirement. The mere fact that petitioner disagrees with the Board’s conclusion without any additional information does not advance a cause of action, and thus, the petition of appeal should be dismissed.

### **FINDINGS AND CONCLUSIONS**

The Board of Examiners is responsible for determining if an instructional teaching certificate may be issued to an applicant. N.J.S.A. 18A:6-38. If an applicant for a teaching certificate has been advised of a deficiency in their certification requirements, they “may



provide the Board of Examiners with evidence of alternative education and/or experience that he or she believes is equivalent to the area(s) of deficiency.” N.J.A.C. 6A:9B-4.12(b). The Board is not permitted to waive any requirements, but can consider alternative education if the petitioner demonstrates, by a preponderance of the credible evidence, that alternative education is the one-to-one equivalent with the statutory requirements. The controlling regulation N.J.A.C. 6A:9B-8 and 9, requires that a candidate for K-6 CEAS must have completed a minimum of 69 semester hour credits in liberal arts and or science that is documented on a transcript from an accredited college or university. N.J.A.C. 6A:9B-10.2.

Petitioner carries the burden of demonstrating by a preponderance of the credible evidence that she is entitled to the certification she seeks. Walder v. N.J. Dep’t of Educ., St. Bd. of Exam’rs, EDU 08530-14, Initial Decision (Nov. 10, 2014), adopted, Comm’r (December 29, 2014). The Board need only demonstrate that its determination is legally consistent with the applicable statutory and regulatory provisions.

On appeal, the only issue is whether the Board’s decision is supported by the record and consistent with the regulatory scheme.

I **FIND** and **CONCLUDE** that the Board’s denial is well supported by the record and is consistent with the law. It is worth emphasizing that while the Board can consider alternative education, it cannot waive any requirements as set forth in N.J.A.C. 6A:9B4.12. It can consider alternative education if a petitioner demonstrates a one-to-one equivalency with the statutory requirements. The Board has considered the petitioner’s submission and, in its discretion, has concluded that it does not meet the one-to-one equivalency of 21.5 additional liberal arts credits. Its reasoning is that a Teacher of Elementary K-6 must teach a broad array of subject matters from language arts literacy, mathematics, science, computer and language literacy, social studies, world languages as well as basic skills reading, writing, mathematics and spelling to all grade levels. Thus, a broad base in liberal arts is required and necessary. I **CONCLUDE** that the motion to dismiss must be granted and it is so **ORDERED**.

**ORDER**


Based upon the foregoing, I hereby **ORDER** that the respondent State Board of Examiners' motion to dismiss is hereby **GRANTED**. It is further **ORDERED** that the appeal of petitioner Alyssa Danielle DeBlasis from the denial of her application for a Teacher of Elementary K-6 Certificate of Eligibility with Advanced Standing is hereby **DISMISSED**.

I hereby **FILE** this initial decision with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION** for consideration.

This recommended decision may be adopted, modified, or rejected by the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION**, who by law is authorized to make a final decision in this matter. If the Commissioner of the Department of Education does not adopt, modify, or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 52:14B-10.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the **COMMISSIONER OF THE DEPARTMENT OF EDUCATION**. Exceptions may be filed by email to **ControversiesDisputesFilings@doe.nj.gov** or by mail to **Office of Controversies and Disputes, 100 Riverview Plaza, 4th Floor, PO Box 500, Trenton, New Jersey 08625-0500**. A copy of any exceptions must be sent to the judge and to the other parties.

\_\_\_\_\_  
July 25, 2025  
DATE

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**IRENE JONES, ALJ** (Ret., on recall)

Date Received at Agency: \_\_\_\_\_

Date Mailed to Parties: \_\_\_\_\_

jb