

File No.: 12160-87

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Attorneys for Complainants

**In re Complaint Filed by the
Franklin Township Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Gloucester City Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Lower Township Elementary Board of
Education Regarding P.L. 2020, Chapter 44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL
MANDATES**

**COLM-0001-21
CONSOLIDATED ACTIONS**

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT AND
PLEADING SUMMARY
PURSUANT COUNCIL RULE OF
PROCEDURE 8(b).**

TO: Jaclyn M. Frey, Deputy Attorney General

Jaclyn.Frey@law.njoag.gov

Attorney for Respondent, Executive Branch of the State of New Jersey

PLEASE TAKE NOTICE that Complainants, Franklin Township Board of Education, Gloucester City Board of Education, and Lower Township Elementary Board of Education, move before the Council on Local Mandates for summary judgment in their favor and against Respondent. Attached herewith is a copy of Complainants' Brief in Support of this Motion and accompanying Exhibits.

PLEADING SUMMARY

Consistent with the Council’s Rule of Procedure 8(b), Complainants provide the following concise statement setting forth a description of the relief sought and the basis for the requested relief.

Complainants seek a ruling from the Council that Chapter 44 is an unfunded mandate, and that because of Chapter 44, Complainants and other school districts are incurring increased direct expenditures, and that Chapter 44 fails to authorize resources to fund the aforementioned expenditures. In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (March 31, 2020). As such, Complainants seek a ruling that Chapter 44 is an unconstitutional “unfunded mandate.” Id.

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Attorneys for Complainants

By: /s/William C. Morlok
WILLIAM C. MORLOK

DATED: October 12, 2021

File No. 12160-87

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**STATE OF NEW JERSEY
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**COLM-0001-21
CONSOLIDATED ACTIONS**

**STATEMENT OF UNDISPUTED
MATERIAL FACTS IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT**

Complainants, the Franklin Township Board of Education, the Gloucester City Board of Education, and the Lower Township Elementary Board of Education (hereinafter “Complainants”), submit this Statement of Undisputed Material Facts in support of their Motion for Summary Judgment:

BACKGROUND OF CHAPTER 44 LEGISLATION

1. P.L. 2020, Chapter 44 (hereinafter, “Chapter 44”), requires school district employee contribution rates toward health care benefits to be based on a percentage of salary model (with

caps).

2. Chapter 44 requires new school district employees to be enrolled in a healthcare plan known as the New Jersey Educators Health Plan, the Garden State Health Plan, or an equivalent plan (hereinafter, collectively, “NJEHP”).

3. Chapter 44 allows employees who commenced employment prior to its effective date to affirmatively select a plan offered by the employer, waive coverage, or be enrolled in the NJEHP.

4. According to the New Jersey Senate Majority office, “[i]n no case shall an employee contribution [under Chapter 44] exceed the maximum amount for an employee contribution as calculated under Chapter 78.” See EXEC227.

5. Prior to July 7, 2021,¹ the “original language” of Chapter 44 dictated the contribution percentages, contribution caps, and the coverage or co-payment amounts required under the NJEHP.

6. Collective negotiations “over the financial impact of the difference” in implementing the NJEHP were not truly possible prior to July 7, 2021, as there were no health care related financial aspects remaining to negotiate.

7. Chapter 44, as amended, requires that Complainants and employee associations engage in negotiations in order to “substantially mitigate” the financial impact of the difference “when the net cost ... to the employer [for health care benefits] is lower than the cost to the employer would be compared to the NJEHP.”

¹ An amendment to Chapter 44 was signed into law on July 7, 2021: P.L. 2021, Chapter 163.

8. Chapter 44 does not require full mitigation of its financial impact to boards of education through negotiations with the majority representative.

9. Chapter 44 does not require the majority representative to fully reimburse a board of education when the board of education has incurred increased healthcare costs due to Chapter 44.

10. Chapter 44 does not provide funding or any other legitimate means to make up for the negative financial impact on boards of education that has already occurred and continues to occur while lengthy negotiations are pending.

11. Chapter 44 does not authorize resources (i.e., funding) to offset the additional direct expenditures required by boards of education to implement the law.

THE LOWER TOWNSHIP ELEMENTARY BOARD OF EDUCATION

12. The 53 employees² who elected coverage pursuant to Chapter 44 have caused the Lower Township Elementary Board of Education to see an annualized loss of \$79,408.45. See Exhibit A.

13. The “HIC” or Lower Township Elementary Board of Education employee contribution has decreased from \$275,839.33 before Chapter 44, to \$145,181.88. See Exhibit A.

14. Chapter 44 has caused the overall healthcare costs in the Lower Township Elementary School District (i.e., the combined contributions from both the Lower Township Elementary Board of Education and its employees) for the 53 employees utilizing Chapter 44 coverage, to

² All data referenced herein dates back to when the Amended Complaints were filed in these matters, or earlier, as indicated in the Amended Complaints.

go down \$51,249.00, yearly. See Exhibit A.

15. Chapter 44 has not allowed the Lower Township Elementary Board of Education to realize any of those savings, instead requiring them to pay \$79,408.45 more during the 2020-2021 school year. See Exhibit A.

16. The Lower Township Elementary Board of Education has provided data that shows its healthcare contributions have increased due to Chapter 44. See Exhibit A.

17. The Lower Township Elementary Board of Education did not receive resources (i.e., funding) from Chapter 44. See Certification of Morlok at ¶ 12.

THE FRANKLIN TOWNSHIP BOARD OF EDUCATION

18. The Franklin Township Public School District and their employees currently pay a combined total of \$24,169,030.92 for healthcare coverage. See Exhibit B, page 1.

19. If every Franklin Township Public School District employee was placed in the NJEHP plan, it would cost \$25,300,998.30, or \$1,131,967.68 more for the public school district and taxpayers. See Exhibit B, page 1.

20. If all Franklin Township Public School District employees switched to the NJEHP, the Franklin Township Board of Education would pay \$3,292,715.52 more, annually. See Exhibit B, page 1.

21. If the 39 employees hired by the Franklin Township Public School District on or after July 1, 2020 were placed in the NJEHP plan, as required by Chapter 44, the Franklin Township Board of Education would pay \$131,222.60 more annually for healthcare, with new employees paying \$66,446.68 less, for an increased overall cost of \$64,776.12. See Exhibit B, page 2.

22. If 80% of Franklin Township Public School District employees who could choose the NJEHP plan, did so, the Franklin Township Board of Education would pay \$2,660,416.94 more, with employees paying \$1,741,887.57 less, for an increased overall cost of \$918,529.37. See Exhibit B, page 3.

23. If 50% of Franklin Township Public School District employees who could choose the NJEHP plan, did so, the Franklin Township Board of Education would pay \$1,711,969.06 more, with employees paying \$1,113,597.16 less, for an increased overall cost of \$598,371.90. See Exhibit B, page 4.

24. If 25% of Franklin Township Public School District employees who could choose the NJEHP plan, did so, the Franklin Township Board of Education would pay \$921,595.83 more, with employees paying \$590,021.82 less, for an increased overall cost of \$331,574.01. See Exhibit B, page 5.

25. The Franklin Township Board of Education has provided data that shows their healthcare contributions would increase due to Chapter 44. See Exhibit B.

26. The Franklin Township Board of Education is not entitled to receive resources (i.e., funding) from Chapter 44. See Certification of Morlok at ¶ 7.

THE GLOUCESTER CITY BOARD OF EDUCATION

27. The Gloucester City Board of Education has seen a monthly loss of \$9,833 by implementing Chapter 44, which is annualized to \$117,996. See Exhibit C.

28. Gloucester City Board of Education employees are contributing \$18,898 less per month, per the March 2021 data. See Exhibit C.

29. Chapter 44 has caused overall healthcare costs in the Gloucester City School District (i.e., the combined contributions from both the Gloucester City Board of Education and its employees) to go down by \$9,065 per month. See Exhibit C.

30. Chapter 44 has not allowed the Gloucester City Board of Education to realize any of those savings, instead requiring them to pay \$9,833 more per month. See Exhibit C.

31. The Gloucester City School District's projections show that Chapter 44 will cause healthcare costs to continue to shift to the Gloucester City Board of Education as salaries increase for the 2021-2022 school year, as evidenced by the July 2021 numbers, which shows a monthly expenditure increase of \$10,480.68. See Exhibit C.

32. The Gloucester City Board of Education has provided data that shows their healthcare contributions have increased due to Chapter 44. See Exhibit C.

33. The Gloucester City Board of Education did not receive resources (i.e., funding) from Chapter 44. See Certification of Morlok at ¶ 10.

DATA FROM OTHER BOARDS OF EDUCATION

34. Similarly situated school districts throughout the State of New Jersey are also incurring additional direct expenditures by implementing Chapter 44 and the NJEHP.

35. The Boonton Public Schools Board of Education's share of healthcare expenses increased by \$125,000 for the 2020-2021 fiscal year as a result of implementing Chapter 44. See Exhibit D at EXEC003.

36. The Boonton Board of Education's healthcare expenses are projected to increase to at least \$275,000 during the 2021-2022 fiscal year due to Chapter 44. See Exhibit D at EXEC003.

37. The Hackettstown School District has also incurred an additional \$181,000 annually by implementing Chapter 44. See Exhibit D at EXEC008.

38. The Scotch-Plains Fanwood Board of Education lost approximately \$300,764.79 during the 2020-2021 school year alone by implementing Chapter 44 and the NJEHP. See Exhibit D at EXEC013.

NEW JERSEY DEPARTMENT OF EDUCATION DATA

39. Chapter 44 requires cost savings based upon its implementation to “be used solely and exclusively by the school district for the purpose of reducing the amount that is required to be raised by the local property tax levy by the school district for school district purposes...” N.J.S.A. 18A:16-13.3(a).

40. Chapter 44 also required the collection of data regarding healthcare costs:

To enable tracking of health care cost savings by school districts, each school district shall submit an annual data sheet for both the current and prior year showing the Total Annual Cost of Health Benefits for Active Employees, the Total Employee Cost-Sharing Contribution, and the Net Cost to the School District for Health Benefits, including the Number of Covered Employees, the Annual Cost Estimate Per Employee, and the Total Cost for each coverage category – Single Coverage, Parent and Child, Employee and Spouse, and Family. In addition, school districts shall provide separate breakouts of the same categories of data for health care coverage under all health care benefits plans offered by the employer. The datasheet shall also indicate whether the school district is enrolled in the School Employees’ Health Benefits Program for medical or medical and prescription drug benefits coverage. Reports shall be due no later than 60 days following each enrollment period to the Department of Education, the Division of Pensions and Benefits in the Department of the Treasury, and the Legislature.

N.J.S.A. 18A:16-13.3(b).

41. The New Jersey Department of Education provided the annual data collected through discovery in an excel sheet labeled EXEC015.

42. According to the data provided by the New Jersey Department of Education in EXEC015, the cost of healthcare (and/or projected cost) has increased for over 250 school boards throughout the State of New Jersey as a result of Chapter 44. See EXEC015 and Exhibit E.

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By: /s/William C. Morlok
WILLIAM C. MORLOK

DATED: October 12, 2021

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**STATE OF NEW JERSEY
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**COLM-0001-21
CONSOLIDATED ACTIONS**

**BRIEF IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT**

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INTRODUCTION

Complainants, the Franklin Township Board of Education, the Gloucester City Board of Education, and the Lower Township Elementary Board of Education (hereinafter “Complainants”), through their undersigned counsel, file this Brief in Support of their Motion for Summary Judgment before the Council on Local Mandates (“Council”).

FACTUAL BACKGROUND

A Statement of Undisputed Material Facts and corresponding Certification of William C. Morlok, Esq., have been submitted with this motion and are herewith incorporated by reference as if fully set forth herein, pursuant to Rule 1:4-3. The facts of this matter are summarized below.

Prior to the passage of P.L. 2020, Chapter 44 (hereinafter, “Chapter 44”), school district employee contribution rates toward health care benefits were based on a percentage of premium model. With the passage of Chapter 44, school district employee contribution rates toward health care benefits are now based on a percentage of salary model (with caps), and employees are enrolled in a plan known as the New Jersey Educators Health Plan, the Garden State Health Plan, or an equivalent plan (hereinafter, collectively, “NJEHP”). See Statement of Undisputed Material Facts (hereinafter, “Statement”) at ¶¶ 1-2. Notably, this change in the basis for contribution rates reduces the percentage of the employee contribution from a range of 3% to 35% to a range of 1.7% to 7.2%, as detailed in Chapter 44. As a result of Chapter 44, Complainants (and over 250 other school districts throughout New Jersey) have been forced to absorb this differential in the lower percentage of employee contribution rates, increasing the cost of health care benefits for school boards under the NJEHP.

Chapter 44 does not provide resources or funding to school boards who have incurred increased costs. See Statement at ¶¶ 8-11. The Gloucester City Board of Education and the Lower Township Elementary Board of Education have clearly shown increased costs, while the Franklin Township Board of Education has shown the substantial losses they will incur if they comply with the unconstitutional unfunded mandate. See Statement at ¶¶ 15, 19-24, 27.

Prior to July 7, 2021,¹ the “original language” of Chapter 44 stated that “the employer and the majority representative shall engage in collective negotiations over the financial impact of the [cost] difference” when the net cost to the employer under the NJEHP is higher than the net cost of health care benefits coverage available to employees through an existing collective negotiation agreement. However, Complainants still remained bound by the contribution percentages, contribution caps, and the coverage or co-payment amounts set forth in Chapter 44. See Statement at ¶ 5. Accordingly, such collective negotiations “over the financial impact of the difference” in implementing the NJEHP were not truly possible prior to July 7, 2021, as there were no health care related financial aspects remaining to negotiate. See Statement at ¶ 6.

As amended, Chapter 44 now requires that Complainants and employee associations engage in negotiations in order to “**substantially mitigate**” the financial impact of the difference “when the net cost ... to the employer [for health care benefits] is lower than the cost to the employer would be compared to the NJEHP.” See Statement at ¶ 7. Under the amended law,

¹ Chapter 44 was amended on July 7, 2021 by P.L.2021, Chapter 163.

substantial mitigation may include changes to plan level offerings or contributions for the NJEHP, or to both plan level offerings and contributions. However, the amended law does not provide any mechanism for Complainants to recoup the prior financial impacts of implementing the “original version” of Chapter 44, or the current and continuing financial impacts while lengthy negotiations occur. See Statement at ¶ 10. While not providing any funding or resources, Chapter 44 even fails to call for full mitigation. See Statement at ¶ 8.

Chapter 44 continues to be an unfunded mandate because it has not provided funding or any other legitimate means to make up for the negative financial impact that has already occurred and continues to occur while lengthy negotiations are pending. See Statement at ¶ 10-11.

ARGUMENT

A. Standard of Review

Summary judgment is proper where “the pleadings, depositions, answers to interrogatories and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact challenged and that the moving party is entitled to a judgment or order as a matter of law.” R. 4:46-2(c); see also Brill v. Guardian Life Ins. Co. of Am., 142 N.J. 520, 540 (1995); Seals v. Cty. of Morris, 417 N.J. Super. 74, 84 (App. Div. 2010).

To defeat summary judgment, the non-moving party must come forward with “specific facts showing that there is a genuine issue for trial.” R. 4:46-5; see also Alpert, Goldberg, Butler, Norton & Weiss, P.C. v. Quinn, 410 N.J. Super. 510, 538 (App. Div. 2009), certif. denied, 203 N.J. 93 (2010). This standard allows a court to enter summary judgment where, based upon the evidence in the record, a rational fact-finder could “reach but one conclusion.” Brill, 142 N.J. at

540. Thus, the summary judgment procedure is intended to “separate real issues from issues about which there is no serious dispute.” Shelcusky v. Garjulio, 172 N.J. 185, 200-01 (2002).

Summary judgment should also be granted when the evidence is so one-sided that one party must prevail as a matter of law.

By its plain language, R. 4:46-2 dictates that a court should deny a summary judgment motion only where the party opposing the motion has come forward with evidence that creates a “genuine issue as to any material fact challenged.” That means a non-moving party cannot defeat a motion for summary judgment merely by pointing to any fact in dispute.

[Brill, 142 N.J. at 529 (emphasis in original).]

Although the Council has not promulgated a rule regarding motions for summary disposition, it has generally been guided by the New Jersey Rules of Court and New Jersey Court decisions. In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (April 26, 2017). Summary judgment is appropriate where there exists no genuine issue of material fact and the moving party is entitled to prevail as a matter of law. Id. (citing R. 4:46-2). “Once the moving party presents sufficient evidence in support of its motion, the opposing party must show by competent evidence that a genuine issue of fact exists.” Id. (citing Globe Motor Co. v. Igdalev, 225 N.J. 269, 479-80 (2016)). The Council, in reaching its determination, must draw all legitimate inferences in favor of the non-moving party. Id. (citing R. 4:46-2(c)).

The Council’s standard for summary judgment was first addressed in 1999, and later reaffirmed in 2002. See In re Board of Education of the Borough of Highland Park, Council on

Local Mandates (August 5, 1999); In re Ocean Township (Monmouth County) and Frankford Township; Council on Local Mandates (August 2, 2002). In addition to adopting the standard articulated in Brill, supra, the Council stated that because these rulings are not the subject of judicial review, requests for summary disposition are to be reviewed “with great caution.” In re Board of Education of the Borough of Highland Park, Council on Local Mandates (August 5, 1999), at 12-13. The Council in Ocean/Frankford further clarified that summary judgment should only be granted “if the Council concludes that no further factual information would be relevant to its decision.” In re the Borough of Jamesburg, Council on Local Mandates Decision (October 28, 2004) (citing Ocean/Frankford, at 5).

Respondent cannot set forth “specific facts showing that there is a genuine issue for trial” and for that reason and for the other reasons set forth herein, summary judgment must be entered granting Complainants the relief they seek.

B. The Unfunded Mandate Standard

Consistent with N.J.S.A. 52:13H-2, laws enacted after particular dates in 1996 “shall cease to be mandatory in its effect and shall expire” if they are unfunded mandates, causing boards of education (among other local government entities) to incur “additional direct expenditures” to implement the law. The Council has previously described the standard as:

An unconstitutional, “unfunded mandate” exists when: (1) the law imposes a “mandate” on a unit of local government; (2) direct expenditures are required for the implementation of the law’s requirements; and (3) the law fails to authorize resources, other than the property tax, to offset the additional direct expenditures on the unit of local government.

In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (March 31, 2020) (internal citations omitted).

The Council has previously found that an initial cost of \$6,000, a recurring annual cost of \$1,000, and an estimated stipend cost of \$2,000 to \$4,000 per year to implement anti-bullying requirements imposed by the Legislature was an unfunded mandate. In the Matter of a Complaint filed by the Allamuchy Township Board of Education, Council on Local Mandates Decision (May 1, 2012).

Here, Chapter 44 has caused Complainants, the Lower Township Elementary Board of Education and the Gloucester City Board of Education, as well as countless school boards throughout the state, to incur significant expenses without the required authorization of additional funding.

C. Chapter 44 Imposes a Mandate on Complainants.

The language of Chapter 44 requires Complainants to offer the NJEHP or an equivalent plan to their employees. More specifically, the law states that “a board of education as an employer providing health care benefits coverage for its employees ... **shall offer to its employees** ... the equivalent of the New Jersey Educators Health Plan in the School Employees' Health Benefits Program...” N.J.S.A. 18A:16-13.2(a)(1) (emphasis added). It is a well-established principle of statutory interpretation that the use of “shall” constitutes mandatory, rather than permissive, language. See Maine Community Health Options v. United States, 140 S. Ct. 1309, 1320 (2020) (stating that “[t]he first sign that the statute imposed an obligation is its mandatory language: ‘shall.’ Unlike the word ‘may,’ which implies discretion,

the word ‘shall’ usually connotes a requirement.”). Accordingly, there is nothing “optional” or discretionary about the law for Complainants. Under Chapter 44, Complainants must offer their employees the NJEHP or an equivalent plan.

The Franklin Township Board of Education is the only school board that the undersigned is aware of that has refused to implement Chapter 44 due to its unfunded and, therefore, unconstitutional nature. See Certification of Counsel (hereinafter, “Certification”) at ¶ 4. As indicated in the attached certification of counsel, the Franklin Township Board of Education has been sued by the Franklin Township Education Association (and similar entities). See Certification at ¶ 5. The Franklin Township Board of Education has been unable to secure a meeting with the Franklin Township Education Association to mitigate the impacts of Chapter 44, after numerous attempts. See Certification at ¶ 6. The substantial financial harm of even placing new hires in the NJEHP is discussed directly below. This situation highlights the lack of practical enforcement mechanisms for both offering the NJEHP through Chapter 44 and demanding that, consistent with Section 8 of Chapter 44, “the employer and the majority representative shall engage in collective negotiations, that include all terms and conditions of employment, to substantially mitigate the financial impact of the difference...”

Therefore, Complainants can conclusively establish that Chapter 44 imposes a mandate upon them, satisfying the first element of an unconstitutional, unfunded mandate.

D. Direct Expenditures are Required for Complainants to Implement Chapter 44.

Complainants have demonstrated that they have suffered and continue to suffer significant financial losses as a result of implementing Chapter 44. Due to their implementation

of Chapter 44, the Lower Township Elementary Board of Education experienced increased healthcare costs of \$79,408.45 during the 2020-2021 school year. See Exhibit A. Meanwhile, the Gloucester City Board of Education has seen a monthly loss of \$9,833 for implementing Chapter 44, which is annualized to \$117,996.00. See Exhibit C. While the Franklin Township Board of Education has not actually implemented Chapter 44 due to the projected costs associated with doing so, its data shows that additional expenditures of anywhere from \$131,222.60 (just “new employees” switching) to \$3,292,715.52 (all employees switching) would be incurred as a result. See Exhibit B. The fact that the Franklin Township Board of Education has not implemented Chapter 44 does not impact its standing before the Council. N.J.S.A. 52:13H-16 specifically allows the Council to issue preliminary rulings where “significant financial hardship to the county, municipality or school district would result from compliance and there is a substantial likelihood that the statute or the rule or regulation is, in fact, an impermissible, unfunded State mandate.” Further, Council decisions only require that the direct expenditures “are required for the implementation of the law’s requirements.” In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (March 31, 2020) (internal citations omitted).

The additional expenditures from Chapter 44 are not only being incurred by Complainants, but by other similarly situated school districts around the State of New Jersey. See Exhibit D. The New Jersey Department of Education has provided discovery in this matter that has shown the sweeping negative impacts of Chapter 44. For instance, the Boonton Public Schools Board of Education’s share of healthcare expenses increased by \$125,000 for the 2020-

2021 fiscal year. See Exhibit D at EXEC003. Boonton’s healthcare expenses are projected to increase to at least \$275,000 during the 2021-2022 fiscal year. See Exhibit D at EXEC003. The Hackettstown School District and the Scotch-Plains Fanwood Board of Education are also experiencing these skyrocketing healthcare expenses. See Exhibit D at EXEC008-014.

The New Jersey Department of Education also provided an excel sheet for healthcare cost data that they collected from school districts as required by Chapter 44, consistent with N.J.S.A. 18A:16-13.3. When viewing the contributions of school boards across the state, the New Jersey Department of Education’s data shows that the cost of healthcare has increased for over 250 school boards. See Exhibit E.² Exhibit E shows school boards’ prior actual costs on the left and their projected costs on the right. Those highlighted show an increase in the amount a board of education contributes or is projected to contribute to healthcare.

The data demonstrates that healthcare costs have been disproportionately shifted to Complainants and hundreds of other school boards. Complainants have therefore successfully established the second element of an unconstitutional, unfunded mandate – the direct expenditures required to implement Chapter 44.

E. Chapter 44 Fails to Authorize Resources to Offset the Additional Direct Expenditures on Complainants.

Respondent will argue that, because the amended version of Chapter 44 now requires Complainants and employee associations to engage in negotiations in order to “**substantially**

² This data was pulled directly from EXEC015 (specifically the columns labeled “Total Plan Net Cost”), which was provided by the New Jersey Department of Education in discovery.

mitigate” the financial impact of implementing the law, it cannot be an unfunded mandate. In other words, the ability to negotiate some of the changes to plan level offerings or contributions for the NJEHP, or to both plan level offerings and contributions, creates “resources” for Complainants to offset their additional expenditures in implementing Chapter 44. However, Respondent conveniently overlooks the fact that the unfunded mandate standard requires a law to “authorize resources, other than the property tax, to offset the additional direct expenditures on the unit of local government.” In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (March 31, 2020). If the law fails to do so, then it is an unfunded mandate. Contrary to the requirements in In the Matter of Complaint Filed by Deptford Township, Council on Local Mandates Decision (April 20, 2016), Chapter 44 fails to authorize any, let alone sufficient, funding to cover costs incurred as a result of compliance.

Under the amended version of Chapter 44, there is still no authorization of specific resources or funding for Complainants to implement same. The legislation calls for only “substantial mitigation” with no mechanism to ensure negotiations occur, that they are done in a timely manner, or that a board of education is made whole. Said another way, instead of funding, the legislature requires school boards to come up with their own “band aid” or solution to stop some of the “financial bleeding” caused by Chapter 44, without any mechanism for enforcement.

The Council has previously rejected the argument that a statute or regulation may rely upon existing revenue sources or funds not specifically earmarked in order to establish constitutionality. See In re Special Services School Districts of Burlington, Atlantic, Cape May, and Bergen Counties, Council on Local Mandates (July 26, 2007). In Special Services School

Districts, several local school districts challenged a Department of Education regulation reducing the maximum age span in elementary school special education classes. Id. at 3. The Commissioner did not allege that the regulation provided a new source of revenue, but instead argued that any additional costs could be offset by the generalized appropriation of additional State aid to school districts as well as other regulatory changes providing districts flexibility to reorganize their services. Id. at 15.

The Council held that allowing the Commissioner to rely on State aid or administrative savings which were not specifically earmarked for implementing the new regulation “would risk opening a loophole that could severely undermine the ‘State mandate/State pay’ principle.” Id. at 15-16. The Council explained that, unless funds are specifically earmarked, those resources are to be used at the district’s discretion and to allow the Commissioner to use those resources to justify an otherwise unfunded mandate would frustrate the principles of N.J. Const. art. VIII, §2, ¶ 5(a) and N.J.S.A. 52:13H-2. Id. at 16. This logic remains applicable even where the statute or regulation explicitly authorizes the use of a non-specific grant or State aid. See In re the Borough of Rocky Hill and Southampton Township, Deerfield Township, Shamong Township, Upper Deerfield Township, and Buena Vista Township, Council on Local Mandates (October 22, 2008).

It is anticipated that Respondent will argue that the Constitution only requires the authorization of a resource and does not necessarily require that one be provided. However, the Council has only accepted this argument in cases where the local entity was able to unilaterally exercise this power to offset the costs of the mandate. For example, the Council held that a statute

was not unfunded where it specifically authorized the municipality to establish reasonable fees to cover administrative costs for the issuance of building permits, certificates, and authorizations. See In re Ocean Township (Monmouth County) and Frankford Township, Council on Local Mandates (August 2, 2002) at 8-10. Here, Complainants cannot take any unilateral action to offset the costs of Chapter 44, but they instead must attempt to negotiate with their respective employee associations. As noted earlier, there is no mechanism to even ensure that such negotiations over the financial impact of Chapter 44 occur or that they are done in a timely manner, and full mitigation is not required.

In light of the Council's previous decisions, and despite Respondent's anticipated argument to the contrary, the illusion of the ability to negotiate and "substantially mitigate" the financial impact of Chapter 44 does not amount to an "authorization of resources" within the definition of an unconstitutional, unfunded mandate. In re Complaint Filed by the New Jersey Association of Counties, Council on Local Mandates Decision (March 31, 2020) (internal citations omitted). As noted above, this newfound ability to negotiate also does not provide a mechanism for Complainants to recoup the prior financial impacts of implementing the "original version" of Chapter 44, or the current and continuing financial impacts while lengthy negotiations occur.

Although Chapter 44 does not provide resources or funding to school boards that have incurred increased direct expenditures, the legislation brazenly requires that "[a]ctual savings realized by a school district as a result of the implementation of the provisions of P.L.2020, c.44 (C.52:14-17.46.13 et al.) shall be used solely and exclusively by the school district for the

purpose of reducing the amount that is required to be raised by the local property tax levy...”
N.J.S.A. 18A:16-13.3. As a result, those school boards who are saving money due to Chapter 44 are unable to retain the savings to improve the quality of education in their district. Chapter 44 not only fails to provide funding, but it removes resources from school districts.

Therefore, Complainants can establish the third and final element of an unconstitutional, unfunded mandate. Chapter 44 fails to authorize resources, other than the property tax, to offset the additional direct expenditures on Complainants.

CONCLUSION

For all of the foregoing reasons, Complainants respectfully request that the Council grant their Motion for Summary Judgment.

PARKER McCAY P.A.
Attorneys for Complainants

By: /s/ William C. Morlok
WILLIAM C. MORLOK

DATED: October 12, 2021

4816-3009-6638, v. 2

File No. 12160-87

Law Offices

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Attorneys for Complainants

**In re Complaint Filed by the
Franklin Township Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Gloucester City Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Lower Township Elementary Board of
Education Regarding P.L. 2020, Chapter 44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL
MANDATES**

**COLM-0001-21
CONSOLIDATED ACTIONS**

PROPOSED ORDER

AND NOW, this ____ day of _____ 2021, upon consideration of Complainants' Motion for Summary Judgment and any response thereto, it is hereby **ORDERED** that Complainants' Motion is **GRANTED**; and

IT IS FURTHER ORDERED that P.L. 2020, Chapter 44 is an unconstitutional unfunded mandate and is no longer mandatory, having expired as of today.

The Honorable John A. Sweeney, A.J.S.C. (Ret.)
Chairman, Council on Local Mandates

File No. 12160-87

PARKER McCAY P.A.
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Attorneys for Complainants

**In re Complaint Filed by the
Franklin Township Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Gloucester City Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Lower Township Elementary Board of
Education Regarding P.L. 2020, Chapter 44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL
MANDATES**

**COLM-0001-21
CONSOLIDATED ACTIONS**

**CERTIFICATION OF WILLIAM
C. MORLOK, ESQ. IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT**

I, WILLIAM C. MORLOK, ESQ., of full age and duly sworn upon my oath, certify:

1. I am an attorney-at-law of the State of New Jersey employed by the law firm of Parker McCay P.A., attorneys for Complainants, Franklin Township Board of Education, Gloucester City Board of Education, and Lower Township Elementary Board of Education.

2. I am one of the attorneys responsible for the management of this matter on behalf of the Franklin Township Board of Education, Gloucester City Board of Education, and Lower Township Board of Education; as such, I am fully familiar with its facts and circumstances.

3. I make this Certification in support of the Franklin Township Board of Education, Gloucester City Board of Education, and Lower Township Board of Education's Motion for Summary Judgment.

4. The Franklin Township Board of Education has refused to implement Chapter 44 as it is an unconstitutional unfunded mandate.

5. The Franklin Township Board of Education has been sued by the Franklin Township Education Association (and others) relating to the Franklin Township Board of Education's refusal to implement Chapter 44.

6. The Franklin Township Board of Education has attempted on numerous occasions to secure a meeting with the Franklin Township Education Association to attempt to mitigate the financial impact of Chapter 44 and have been unable to secure the same.

7. The Franklin Township Board of Education is not entitled to earmarked funding from the legislative branch, by way of Chapter 44, to offset the increased costs of Chapter 44 if they implement the same.

8. The Gloucester City Board of Education has implemented Chapter 44, which caused their contributions to healthcare costs to increase.

9. The Gloucester City Board of Education has corresponded with the Gloucester City Education Association regarding the financial impacts of Chapter 44 and have yet to secure any mitigation, but plan to further address the same at their monthly meeting on November 1, 2021.

10. The Gloucester City Board of Education has not received earmarked funding from the legislative branch, by way of Chapter 44, to offset the increased costs of Chapter 44.

11. The Lower Township Elementary Board of Education has opted to address the financial impact at the next collective negotiations and have no assurances they will be made whole.

12. The Lower Township Elementary Board of Education has not received earmarked funding from the legislative branch, by way of Chapter 44, to offset the increased costs of Chapter 44.

13. The data from Exhibit E is derived completely from EXEC015 that was provided by the New Jersey Department of Education.

14. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

15. I certify that Exhibits A through Exhibits E are true and accurate copies.

DATED: October 12, 2021

/s/ William C. Morlok
WILLIAM C. MORLOK, ESQ.

4850-3153-1774, v. 1

Exhibit A

”

LOWER TOWNSHIP SCHOOL DISTRICT

		SWITCHED TO:						
		CHAPTER 44%				CHAPTER 78%		
Plan	COUNT	20-21 Salary	medical/rx	hic	net to school	medical/rx	hic	net cost to school
E/S	6	\$ 398,583.00	\$ 177,186.00	\$ 18,750.60	\$ 158,435.40	\$ 184,008.00	\$ 39,255.04	\$ 144,752.96
F	23	\$ 1,576,203.00	\$ 763,738.00	\$ 85,161.83	\$ 678,576.17	\$ 793,247.00	\$ 152,441.38	\$ 640,805.62
P/C	10	\$ 721,269.00	\$ 191,700.00	\$ 24,063.35	\$ 167,636.65	\$ 199,450.00	\$ 46,870.75	\$ 152,579.25
S	14	\$ 733,490.00	\$ 184,674.00	\$ 17,206.10	\$ 167,467.91	\$ 191,842.00	\$ 37,272.16	\$ 154,569.84
	53	\$ 3,429,545.00	\$ 1,317,298.00	\$ 145,181.88	\$ 1,172,116.12	\$ 1,368,547.00	\$ 275,839.33	\$ 1,092,707.67
		loss to board by the switch to chapter 44				\$ 79,408.45		

File No. 30339-1

Law Offices

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Attorneys for Complainant, Lower Township Elementary Board of Education

**In re Complaint Filed by the
Lower Township Elementary Board of
Education Regarding P.L. 2020, Chapter
44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL MANDATES**

COLM-0001-21

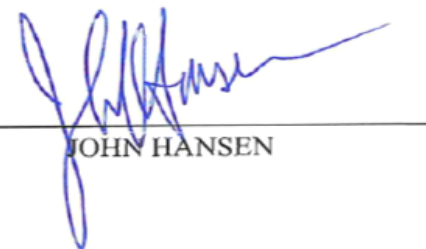
CERTIFICATION OF JOHN HANSEN

I, John Hansen, School Business Administrator and Board Secretary for the Lower Township Elementary Board of Education, being of full age, do hereby certify as follows:

1. I am the School Business Administrator and Board Secretary for the Lower Township Elementary Board of Education.
2. The data and figures contained in Exhibits A and B, which are attached to Lower Township Elementary Board of Education's Amended Complaint, are true and accurate.

I certify that the foregoing statements made by me are true. I acknowledge that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: _____



JOHN HANSEN

Dated: July 29, 2021

EXHIBIT B

HMO w/Rx = Aetna HMO with prescription plan included

OA w/Rx = Aetna Open Access with prescription plan included

Benefit class #	Benefit Class Name	# EE in Class	Description	HMO w/Rx	Employee Difference (Monthly)	BOE Difference (Monthly)	Employee Difference (Annually)	BOE Difference (Annually)	OA w/Rx	Employee Difference (Monthly)	BOE Difference (Monthly)	Employee Difference (Annually)	BOE Difference (Annually)
1	FTEA	297	Teachers or Secretaries employed prior to 7/1/2008 Base plan = Open Access	35	(\$5,238.32)	\$14,970.71	(\$62,859.89)	\$179,648.57	262	(\$69,797.24)	\$20,437.63	(\$837,566.83)	\$245,251.51
2	FTSAA	2	Association Administrators employed prior to 7/1/1996 Base plan = Open Access	1	(\$100.57)	(\$172.70)	(\$1,206.84)	(\$2,072.40)	1	(\$36.59)	(\$59.60)	(\$439.08)	(\$715.20)
3	NA-Admins	2	Non-Affiliated Administrators employed prior to 7/1/1996 Base plan = Open Access	0	\$0.00	\$0.00	\$0.00	\$0.00	2	(\$451.31)	\$98.81	(\$5,415.69)	\$1,185.69
4	NA-Clerical	1	Non-Affiliated Secretaries employed prior to 7/1/2008 Base plan = Open Access	0	\$0.00	\$0.00	\$0.00	\$0.00	1	(\$149.75)	(\$26.50)	(\$1,796.97)	(\$318.03)
5	Cabinet	3	District leadership team Base Plan = Open Access	1	(\$62.74)	\$508.55	(\$752.88)	\$6,102.60	2	(\$609.68)	\$117.88	(\$7,316.16)	\$1,414.56
6	FTEA08	419	Teachers or Secretaries employed on or after 7/1/2008 Base plan =HMO	328	(\$38,331.61)	\$132,485.29	(\$459,979.34)	\$1,589,823.50	91	(\$29,312.59)	\$14,248.18	(\$351,751.10)	\$170,978.18
7	FTSSA	109	Support Staff Association members Base Plan = HMO	92	(\$6,220.24)	\$28,545.71	(\$74,642.89)	\$342,548.53	17	(\$3,407.39)	\$891.50	(\$40,888.65)	\$10,697.97
8	FTSAA96	32	Association Administrators employed on or after 7/1/1996 Base plan = Open Access w/additional contribution	12	(\$1,237.67)	\$5,157.05	(\$14,852.02)	\$61,884.58	20	(\$6,301.13)	\$2,260.57	(\$75,613.52)	\$27,126.80
9	NA-Clerical 08	30	Non-Affiliated Secretaries employed on or after 7/1/2008 Base plan = HMO	13	(\$2,018.36)	\$6,897.05	(\$24,220.30)	\$82,764.58	17	(\$4,828.16)	\$1,974.43	(\$57,937.92)	\$23,693.16
10	Paraprofessional	136	Paraprofessionals Base Plan = HMO	108	(\$2,823.75)	\$36,439.35	(\$33,885.02)	\$437,272.22	28	(\$3,598.02)	(\$1,316.16)	(\$43,176.26)	(\$15,793.90)
11	FTEA21	32	Teachers or Secretaries employed on or after 7/1/2020 Current Base plan = HMO	25	(\$2,882.94)	\$8,955.30	(\$34,595.24)	\$107,463.56	7	(\$2,258.39)	\$1,035.05	(\$27,100.64)	\$12,420.56
12	FTSSA21	5	Support Staff Association members employed on or after 7/1/2020 Base Plan = HMO	4	(\$196.30)	\$904.82	(\$2,355.61)	\$10,857.85	1	(\$148.18)	(\$28.07)	(\$1,778.13)	(\$336.87)
13	NA-Clerical 21	1	Non-Affiliated Secretaries employed on or after 7/1/2020 Base plan = HMO	1	(\$12.99)	\$205.96	(\$155.92)	\$2,471.56	0	\$0.00	\$0.00	\$0.00	\$0.00
14	Paraprofessional 21	1	Paraprofessionals employed on or after 7/1/2020 Base plan = HMO	0	\$0.00	\$0.00	\$0.00	\$0.00	1	(\$38.41)	(\$137.84)	(\$460.94)	(\$1,654.06)
		1070		620			(\$709,505.95)	\$2,818,765.15	450			(\$1,451,241.89)	\$473,950.37

Blue = Hired on or after 7/1/2020
Must be placed in new plan.

Annual Premium for Data Set in Current Plan \$24,169,030.92
Annual Premium for Data Set in Chapter 44 Plan \$25,300,998.60
Total Addition Premium \$1,131,967.68

Addition Premium for Claimant Franklin Township Board of Education \$3,292,715.52

HMO w/Rx = Aetna HMO with prescription plan included
 OA w/Rx = Aetna Open Access with prescription plan included

Benefit class #	Benefit Class Name	# EE in Class	Description	HMO w/Rx	Employee Difference (Monthly)	BOE Difference (Monthly)	Employee Difference (Annually)	BOE Difference (Annually)	OA w/Rx	Employee Difference (Monthly)	BOE Difference (Monthly)	Employee Difference (Annually)	BOE Difference (Annually)
11	FTEA21	32	Teachers or Secretaries employed on or after 7/1/2020 Current Base plan = HMO	25	(\$2,882.94)	\$8,955.30	(\$34,595.24)	\$107,463.56	7	(\$2,258.39)	\$1,035.05	(\$27,100.64)	\$12,420.56
12	FTSSA21	5	Support Staff Association members employed on or after 7/1/2020 Base Plan = HMO	4	(\$196.30)	\$904.82	(\$2,355.61)	\$10,857.85	1	(\$148.18)	(\$28.07)	(\$1,778.13)	(\$336.87)
13	NA-Clerical 21	1	Non-Affiliated Secretaries employed on or after 7/1/2020 Base plan = HMO	1	(\$12.99)	\$205.96	(\$155.92)	\$2,471.56	0	\$0.00	\$0.00	\$0.00	\$0.00
14	Paraprofessional 21	1	Paraprofessionals employed on or after 7/1/2020 Base plan = HMO	0	\$0.00	\$0.00	\$0.00	\$0.00	1	(\$38.41)	(\$137.84)	(\$460.94)	(\$1,654.06)
		39					(\$37,106.77)	\$120,792.97	9			(\$29,339.71)	\$10,429.63

Blue = Hired on or after 7/1/2020
 Must be placed in new plan.

TOTAL ADDITIONAL PREMIUM IF ALL 39 "NEW HIRES" ARE PLACED IN THE NEW PLAN \$64,676.12
TOTAL ADDITIONAL PREMIUM TO CLAIMANT FRANKLIN TOWNSHIP BOARD OF EDUCATION \$131,222.60

HMO w/Rx = Aetna HMO with prescription plan included
 OA w/Rx = Aetna Open Access with prescription plan included

Exhibit C - Percentage of Eligible = 80%

Benefit class #	Benefit Class Name	# EE in Class	Description	EE Difference			BOE Difference		
				% Change	HMO w/Rx	OA w/Rx	% Change	HMO w/Rx	OA w/Rx
1	FTEA	297	Teachers or Secretaries employed prior to 7/1/2008 Base plan = Open Access	80%	(\$50,287.91)	(\$670,053.47)	80%	\$143,718.86	\$196,201.21
2	FTSAA	2	Association Administrators employed prior to 7/1/1996 Base plan = Open Access	80%	(\$965.47)	(\$351.26)	80%	(\$1,657.92)	(\$572.16)
3	NA-Admins	2	Non-Affiliated Administrators employed prior to 7/1/1996 Base plan = Open Access	80%	\$0.00	(\$4,332.55)	80%	\$0.00	\$948.55
4	NA-Clerical	1	Non-Affiliated Secretaries employed prior to 7/1/2008 Base plan = Open Access	80%	\$0.00	(\$1,437.57)	80%	\$0.00	(\$254.43)
5	Cabinet	3	District leadership team Base Plan = Open Access	80%	(\$602.30)	(\$5,852.93)	80%	\$4,882.08	\$1,131.65
6	FTEA08	419	Teachers or Secretaries employed on or after 7/1/2008 Base plan =HMO	80%	(\$367,983.47)	(\$281,400.88)	80%	\$1,271,858.80	\$136,782.54
7	FTSSA	109	Support Staff Association members Base Plan = HMO	80%	(\$59,714.31)	(\$32,710.92)	80%	\$274,038.82	\$8,558.38
8	FTSAA96	32	Association Administrators employed on or after 7/1/1996 Base plan = Open Access w/additional contribution	80%	(\$11,881.61)	(\$60,490.81)	80%	\$49,507.66	\$21,701.44
9	NA-Clerical 08	30	Non-Affiliated Secretaries employed on or after 7/1/2008 Base plan = HMO	80%	(\$19,376.24)	(\$46,350.34)	80%	\$66,211.67	\$18,954.53
10	Paraprofessional	136	Paraprofessionals Base Plan = HMO	80%	(\$27,108.01)	(\$34,541.01)	80%	\$349,817.77	(\$12,635.12)
11	FTEA21	32	Teachers or Secretaries employed on or after 7/1/2020 Current Base plan = HMO	100%	(\$34,595.24)	(\$27,100.64)	100%	\$107,463.56	\$12,420.56
12	FTSSA21	5	Support Staff Association members employed on or after 7/1/2020 Base Plan = HMO	100%	(\$2,355.61)	(\$1,778.13)	100%	\$10,857.85	(\$336.87)
13	NA-Clerical 21	1	Non-Affiliated Secretaries employed on or after 7/1/2020 Base plan = HMO	100%	(\$155.92)	\$0.00	100%	\$2,471.56	\$0.00
14	Paraprofessional 21	1	Paraprofessionals employed on or after 7/1/2020 Base plan = HMO	100%	\$0.00	(\$460.94)	100%	\$0.00	(\$1,654.06)
		1070			(\$575,026.11)	(\$1,166,861.45)		\$2,279,170.71	\$381,246.22
						(\$1,741,887.57)			\$2,660,416.94

TOTAL ADDITIONAL PREMIUM \$918,529.37
TOTAL ADDITIONAL PREMIUM TO CLAIMANT FRANKLIN TOWNSHIP BOARD OF EDUCATION \$2,660,416.94

HMO w/Rx = Aetna HMO with prescription plan included
 OA w/Rx = Aetna Open Access with prescription plan included

				Exhibit D - Percentage of Eligible = 50%					
				EE Difference		BOE Difference			
Benefit class #	Benefit Class Name	# EE in Class	Description	% Change	HMO w/Rx	OA w/Rx	% Change	HMO w/Rx	OA w/Rx
1	FTEA	297	Teachers or Secretaries employed prior to 7/1/2008 Base plan = Open Access	50%	(\$31,429.95)	(\$418,783.42)	50%	\$89,824.29	\$122,625.76
2	FTSAA	2	Association Administrators employed prior to 7/1/1996 Base plan = Open Access	50%	(\$603.42)	(\$219.54)	50%	(\$1,036.20)	(\$357.60)
3	NA-Admins	2	Non-Affiliated Administrators employed prior to 7/1/1996 Base plan = Open Access	50%	\$0.00	(\$2,707.85)	50%	\$0.00	\$592.84
4	NA-Clerical	1	Non-Affiliated Secretaries employed prior to 7/1/2008 Base plan = Open Access	50%	\$0.00	(\$898.48)	50%	\$0.00	(\$159.02)
5	Cabinet	3	District leadership team Base Plan = Open Access	50%	(\$376.44)	(\$3,658.08)	50%	\$3,051.30	\$707.28
6	FTEA08	419	Teachers or Secretaries employed on or after 7/1/2008 Base plan =HMO	50%	(\$229,989.67)	(\$175,875.55)	50%	\$794,911.75	\$85,489.09
7	FTSSA	109	Support Staff Association members Base Plan = HMO	50%	(\$37,321.44)	(\$20,444.33)	50%	\$171,274.26	\$5,348.98
8	FTSAA96	32	Association Administrators employed on or after 7/1/1996 Base plan = Open Access w/additional contribution	50%	(\$7,426.01)	(\$37,806.76)	50%	\$30,942.29	\$13,563.40
9	NA-Clerical 08	30	Non-Affiliated Secretaries employed on or after 7/1/2008 Base plan = HMO	50%	(\$12,110.15)	(\$28,968.96)	50%	\$41,382.29	\$11,846.58
10	Paraprofessional	136	Paraprofessionals Base Plan = HMO	50%	(\$16,942.51)	(\$21,588.13)	50%	\$218,636.11	(\$7,896.95)
11	FTEA21	32	Teachers or Secretaries employed on or after 7/1/2020 Current Base plan = HMO	100%	(\$34,595.24)	(\$27,100.64)	100%	\$107,463.56	\$12,420.56
12	FTSSA21	5	Support Staff Association members employed on or after 7/1/2020 Base Plan = HMO	100%	(\$2,355.61)	(\$1,778.13)	100%	\$10,857.85	(\$336.87)
13	NA-Clerical 21	1	Non-Affiliated Secretaries employed on or after 7/1/2020 Base plan = HMO	100%	(\$155.92)	\$0.00	100%	\$2,471.56	\$0.00
14	Paraprofessional 21	1	Paraprofessionals employed on or after 7/1/2020 Base plan = HMO	100%	\$0.00	(\$460.94)	100%	\$0.00	(\$1,654.06)
		1070			(\$373,306.36)	(\$740,290.80)		\$1,469,779.06	\$242,190.00
						(\$1,113,597.16)			\$1,711,969.06
TOTAL ADDITIONAL PREMIUM									\$598,371.16
TOTAL ADDITIONAL PREMIUM TO CLAIMANT FRANKLIN TOWNSHIP BOARD OF EDUCATION									\$1,711,969.06

HMO w/Rx = Aetna HMO with prescription plan included
 OA w/Rx = Aetna Open Access with prescription plan included

				Exhibit E - Percentage of Eligible = 25%					
				EE Difference			BOE Difference		
Benefit class #	Benefit Class Name	# EE in Class	Description	% Change	HMO w/Rx	OA w/Rx	% Change	HMO w/Rx	OA w/Rx
1	FTEA	297	Teachers or Secretaries employed prior to 7/1/2008 Base plan = Open Access	25%	(\$15,714.97)	(\$209,391.71)	25%	\$44,912.14	\$61,312.88
2	FTSAA	2	Association Administrators employed prior to 7/1/1996 Base plan = Open Access	25%	(\$301.71)	(\$109.77)	25%	(\$518.10)	(\$178.80)
3	NA-Admins	2	Non-Affiliated Administrators employed prior to 7/1/1996 Base plan = Open Access	25%	\$0.00	(\$1,353.92)	25%	\$0.00	\$296.42
4	NA-Clerical	1	Non-Affiliated Secretaries employed prior to 7/1/2008 Base plan = Open Access	25%	\$0.00	(\$449.24)	25%	\$0.00	(\$79.51)
5	Cabinet	3	District leadership team Base Plan = Open Access	25%	(\$188.22)	(\$1,829.04)	25%	\$1,525.65	\$353.64
6	FTEA08	419	Teachers or Secretaries employed on or after 7/1/2008 Base plan =HMO	25%	(\$114,994.84)	(\$87,937.77)	25%	\$397,455.88	\$42,744.54
7	FTSSA	109	Support Staff Association members Base Plan = HMO	25%	(\$18,660.72)	(\$10,222.16)	25%	\$85,637.13	\$2,674.49
8	FTSAA96	32	Association Administrators employed on or after 7/1/1996 Base plan = Open Access w/additional contribution	25%	(\$3,713.00)	(\$18,903.38)	25%	\$15,471.14	\$6,781.70
9	NA-Clerical 08	30	Non-Affiliated Secretaries employed on or after 7/1/2008 Base plan = HMO	25%	(\$6,055.08)	(\$14,484.48)	25%	\$20,691.15	\$5,923.29
10	Paraprofessional	136	Paraprofessionals Base Plan = HMO	25%	(\$8,471.25)	(\$10,794.07)	25%	\$109,318.05	(\$3,948.47)
11	FTEA21	32	Teachers or Secretaries employed on or after 7/1/2020 Current Base plan = HMO	100%	(\$34,595.24)	(\$27,100.64)	100%	\$107,463.56	\$12,420.56
12	FTSSA21	5	Support Staff Association members employed on or after 7/1/2020 Base Plan = HMO	100%	(\$2,355.61)	(\$1,778.13)	100%	\$10,857.85	(\$336.87)
13	NA-Clerical 21	1	Non-Affiliated Secretaries employed on or after 7/1/2020 Base plan = HMO	100%	(\$155.92)	\$0.00	100%	\$2,471.56	\$0.00
14	Paraprofessional 21	1	Paraprofessionals employed on or after 7/1/2020 Base plan = HMO	100%	\$0.00	(\$460.94)	100%	\$0.00	(\$1,654.06)
		1070			(\$205,206.56)	(\$384,815.26)		\$795,286.01	\$126,309.82
						(\$590,021.82)			\$921,595.83

TOTAL ADDITIONAL PREMIUM \$331,574.01
TOTAL ADDITIONAL PREMIUM TO CLAIMANT FRANKLIN TOWNSHIP BOARD OF EDUCATION \$921,595.83

File No. 12160-87

Law Offices

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Attorneys for Complainant, Franklin Township Board of Education

**In re Complaint Filed by the
Franklin Township Board of Education
Regarding P.L. 2020, Chapter 44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL MANDATES**

COLM-0001-21

**CERTIFICATION OF BRIAN
BONANNO**

I, Brian Bonanno, Assistant Business Administrator, Assistant Board Secretary, and Manager of Human Resources for the Franklin Township Board of Education, being of full age, do hereby certify as follows:

1. I am the Assistant Business Administrator, Assistant Board Secretary, and Manager of Human Resources for the Franklin Township Board of Education.
2. The data and figures contained in Exhibits A through E, which are attached to Franklin Township Board of Education's Amended Complaint, are true and accurate.

I certify that the foregoing statements made by me are true. I acknowledge that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 29, 2021

By: 
BRIAN BONANNO

GZJ KDV'C

Gloucester City School Board - Census Data as of March 15, 2021

This worksheets lists all staff with benefits as of March 2021. First Section is cost if no EHP Plan Design. Gray section is Actual Choice

Salary	Tier	Plan Option	Enrollment if no EHP			Plan Option	Enrollment w/ EHP as an Option			Contribution Structure Used
			Monthly Premium	Employee Contribution	District Cost		Monthly Premium	Employee Contribution	District Cost	
\$37,230	Family	SHF AETNA POS 10	\$3,116.00	\$174.04	\$2,679.76	SHF AETNA POS 10	\$3,116.00	\$486.24	\$2,679.76	Chapter 78/Chapter 44
\$44,694	Family	SHF AETNA POS 10	\$3,090.00	\$170.60	\$2,919.40	SHF AETNA POS 10	\$3,090.00	\$218.27	\$2,871.73	Chapter 78/Chapter 44
\$44,200	Single	SHF AETNA HMO 10*	\$1,015.00	\$203.00	\$812.00	SHF AETNA HMO 10*	\$1,000.00	\$99.37	\$900.63	Chapter 44
\$44,694	Family	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	Chapter 78
\$39,380	Parent / Child	SHF AETNA HMO 10*	\$1,888.00	\$320.96	\$1,567.04	SHF AETNA HMO 10*	\$1,888.00	\$320.96	\$1,567.04	Chapter 78
\$26,874	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$91.35	\$1,938.65	SHF AETNA HMO 10*	\$2,030.00	\$91.35	\$1,938.65	Chapter 78
\$54,345	Single	SHF AETNA HMO 10*	\$1,015.00	\$203.00	\$812.00	SHF AETNA HMO 10*	\$1,015.00	\$203.00	\$812.00	Chapter 78
\$36,259	Family	SHF AETNA HMO 10*	\$2,903.00	\$174.18	\$2,728.82	SHF AETNA HMO 10*	\$2,860.00	\$99.71	\$2,760.29	Chapter 44
\$46,882	Family	SHF AETNA HMO 10*	\$2,903.00	\$261.27	\$2,641.73	SHF AETNA HMO 10*	\$2,860.00	\$152.37	\$2,707.63	Chapter 44
\$69,774	Family	SHF AETNA POS 10	\$3,116.00	\$592.04	\$2,523.96	SHF AETNA POS 10	\$3,116.00	\$592.04	\$2,523.96	Chapter 78
\$88,830	Family	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	Chapter 78
\$52,964	Single	SHF AETNA POS 10	\$3,090.00	\$218.00	\$872.00	SHF AETNA POS 10	\$3,090.00	\$218.00	\$872.00	Chapter 78
\$36,509	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$142.10	\$1,887.90	HMO 10 - 10%	\$2,030.00	\$203.00	\$1,827.00	Chapter 78
\$62,730	Single	SHF AETNA POS 10	\$3,090.00	\$234.30	\$795.70	SHF AETNA POS 10	\$3,000.00	\$339.69	\$969.31	Chapter 44
\$36,259	Family	SHF AETNA POS 10	\$3,116.00	\$186.96	\$2,929.04	POS 10 - 10%	\$3,116.00	\$211.60	\$2,907.40	Chapter 78
\$59,580	Family	SHF AETNA HMO 10*	\$2,903.00	\$406.42	\$2,496.58	SHF AETNA HMO 10*	\$2,860.00	\$217.73	\$2,642.27	Chapter 44
\$26,874	Single	SHF AETNA HMO 10*	\$1,015.00	\$276.13	\$938.87	SHF AETNA HMO 10*	\$1,000.00	\$38.07	\$961.93	Chapter 44
\$84,694	Family	SHF AETNA POS 10	\$3,116.00	\$747.84	\$2,368.16	SHF AETNA POS 10	\$2,860.00	\$423.47	\$2,436.53	Chapter 44
\$66,499	Single	SHF AETNA HMO 10*	\$3,035.00	\$398.35	\$2,636.65	SHF AETNA HMO 10*	\$3,000.00	\$388.34	\$2,611.66	Chapter 44
\$37,066	Parent / Child	SHF AETNA POS 10	\$2,026.00	\$141.82	\$1,884.18	SHF AETNA POS 10	\$2,026.00	\$202.60	\$1,823.40	Chapter 78
\$36,509	Family	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	Chapter 78
\$43,911	Family	SHF AETNA POS 10	\$3,116.00	\$216.12	\$2,899.88	SHF AETNA POS 10	\$3,116.00	\$216.12	\$2,899.88	Chapter 78
\$62,730	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$436.30	\$1,603.70	SHF AETNA HMO 10*	\$2,030.00	\$436.30	\$1,603.70	Chapter 78
\$85,383	Parent / Child	SHF AETNA HMO 10*	\$1,888.00	\$566.40	\$1,321.60	SHF AETNA HMO 10*	\$1,888.00	\$566.40	\$1,321.60	Chapter 78
\$84,694	Parent / Child	SHF AETNA HMO 10*	\$1,888.00	\$528.64	\$1,359.36	SHF AETNA HMO 10*	\$1,888.00	\$528.64	\$1,359.36	Chapter 78
\$51,142	Single	SHF AETNA POS 10	\$1,090.00	\$128.00	\$962.00	SHF AETNA POS 10	\$1,000.00	\$98.74	\$901.26	Chapter 44
\$84,694	Family	SHF AETNA POS 10	\$3,116.00	\$747.84	\$2,368.16	SHF AETNA POS 10	\$3,116.00	\$747.84	\$2,368.16	Chapter 78
\$84,694	Family	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	Chapter 78
\$36,259	Employer / Spouse	POS 10 - 10%	\$2,178.00	\$217.90	\$1,960.10	POS 10 - 10%	\$2,178.00	\$217.90	\$1,960.10	Chapter 78
\$87,452	Family	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	Chapter 78
\$53,656	Family	SHF AETNA HMO 10*	\$2,903.00	\$348.36	\$2,554.64	SHF AETNA HMO 10*	\$2,860.00	\$396.74	\$2,463.26	Chapter 44
\$78,966	Parent / Child	SHF AETNA POS 10	\$3,030.00	\$627.00	\$2,403.00	SHF AETNA POS 10	\$2,860.00	\$523.15	\$2,336.85	Chapter 44
\$93,885	Single	SHF AETNA POS 10	\$1,090.00	\$370.50	\$719.50	SHF AETNA POS 10	\$1,090.00	\$370.50	\$719.50	Chapter 78
\$88,830	Single	SHF AETNA POS 10	\$1,090.00	\$370.60	\$719.40	SHF AETNA POS 10	\$1,090.00	\$370.60	\$719.40	Chapter 78
\$44,694	Single	SHF AETNA POS 10	\$3,090.00	\$234.30	\$855.70	SHF AETNA POS 10	\$3,000.00	\$339.70	\$960.30	Chapter 44
\$58,243	Parent / Child	SHF AETNA POS 10	\$3,246.00	\$330.82	\$1,915.18	SHF AETNA POS 15	\$3,246.00	\$330.82	\$1,915.18	Chapter 78
\$80,553	Family	SHF AETNA POS 10	\$3,116.00	\$872.48	\$2,243.52	SHF AETNA POS 10	\$3,116.00	\$872.48	\$2,243.52	Chapter 78
\$63,863	Family	SHF AETNA HMO 10*	\$2,903.00	\$499.51	\$2,403.49	SHF AETNA HMO 10*	\$2,903.00	\$499.51	\$2,403.49	Chapter 78
\$84,694	Family	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	Chapter 78
\$63,863	Single	SHF AETNA HMO 10*	\$3,035.00	\$374.05	\$2,660.95	SHF AETNA HMO 10*	\$3,000.00	\$333.05	\$2,667.95	Chapter 44
\$57,793	Parent / Child	SHF AETNA POS 10	\$2,026.00	\$144.42	\$1,881.58	SHF AETNA POS 10	\$2,026.00	\$144.42	\$1,881.58	Chapter 78
\$87,187	Family	SHF AETNA POS 10	\$2,993.00	\$568.67	\$2,424.33	SHF AETNA POS 15	\$2,993.00	\$568.67	\$2,424.33	Chapter 78
\$66,499	Single	SHF AETNA POS 10	\$3,090.00	\$156.12	\$2,933.88	SHF AETNA POS 10	\$3,090.00	\$156.12	\$2,933.88	Chapter 78
\$84,694	Parent / Child	SHF HMO 15/25	\$1,780.00	\$488.40	\$1,291.60	SHF HMO 15/25	\$1,780.00	\$488.40	\$1,291.60	Chapter 78
\$85,383	Single	SHF AETNA HMO 10*	\$1,015.00	\$435.10	\$579.90	SHF AETNA HMO 10*	\$1,015.00	\$435.10	\$579.90	Chapter 78
\$93,885	Family	SHF AETNA POS 10	\$2,903.00	\$812.84	\$2,090.16	SHF AETNA POS 10	\$2,860.00	\$558.37	\$2,301.63	Chapter 44
\$84,694	Family	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10*	\$2,860.00	\$523.47	\$2,336.53	Chapter 44
\$36,509	Family	SHF AETNA POS 10	\$3,090.00	\$234.30	\$855.70	SHF AETNA POS 10	\$3,000.00	\$339.70	\$960.30	Chapter 44
\$70,634	Family	SHF AETNA POS 10	\$3,116.00	\$685.52	\$2,430.48	SHF AETNA POS 10	\$3,116.00	\$685.52	\$2,430.48	Chapter 78
\$54,057	Family	SHF AETNA POS 10	\$3,116.00	\$373.92	\$2,742.08	SHF AETNA POS 10	\$3,116.00	\$373.92	\$2,742.08	Chapter 78
\$91,880	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$609.00	\$1,421.00	SHF AETNA HMO 10*	\$2,030.00	\$609.00	\$1,421.00	Chapter 78
\$63,174	Family	SHF AETNA HMO 10*	\$2,903.00	\$493.51	\$2,409.49	SHF AETNA HMO 10*	\$2,903.00	\$493.51	\$2,409.49	Chapter 78
\$73,021	Family	SHF AETNA POS 15	\$2,993.00	\$658.46	\$2,334.54	SHF AETNA POS 15	\$2,993.00	\$658.46	\$2,334.54	Chapter 78
\$36,509	Family	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	SHF AETNA POS 10	\$2,860.00	\$339.69	\$2,520.31	Chapter 44
\$36,259	Single	POS 10 - 10%	\$1,047.00	\$104.70	\$942.30	SHF AETNA POS 10	\$1,000.00	\$51.37	\$948.63	Chapter 44
\$84,694	Family	SHF AETNA HMO 10*	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10*	\$2,860.00	\$423.47	\$2,436.53	Chapter 44
\$63,707	Single	SHF AETNA POS 10	\$1,090.00	\$284.30	\$795.70	SHF AETNA POS 10	\$1,000.00	\$133.72	\$861.28	Chapter 44
\$41,476	Family	SHF AETNA HMO 10*	\$2,903.00	\$203.21	\$2,699.79	SHF AETNA HMO 10*	\$2,903.00	\$203.21	\$2,699.79	Chapter 78
\$56,414	Single	SHF AETNA POS 10	\$1,090.00	\$320.70	\$769.30	SHF AETNA POS 10	\$1,090.00	\$320.70	\$769.30	Chapter 78
\$52,521	Single	SHF AETNA POS 10	\$1,090.00	\$218.00	\$872.00	SHF AETNA POS 10	\$1,000.00	\$99.29	\$900.71	Chapter 44
\$60,069	Single	SHF AETNA POS 15	\$3,000.00	\$684.00	\$2,316.00	SHF AETNA POS 15	\$3,000.00	\$684.00	\$2,316.00	Chapter 44
\$36,259	Family	HMO 10 - 10%	\$2,903.00	\$262.70	\$2,640.30	HMO 10 - 10%	\$2,903.00	\$262.70	\$2,640.30	Chapter 78
\$39,830	Single	SHF AETNA HMO 10*	\$1,015.00	\$345.10	\$669.90	SHF AETNA HMO 10*	\$1,015.00	\$345.10	\$669.90	Chapter 78
\$52,371	Family	SHF AETNA POS 10	\$3,116.00	\$373.92	\$2,742.08	SHF AETNA POS 10	\$2,860.00	\$393.03	\$2,467.97	Chapter 44
\$52,884	Employer / Spouse	SHF AETNA POS 10	\$2,178.00	\$126.85	\$1,851.15	SHF AETNA POS 10	\$2,000.00	\$171.20	\$1,828.80	Chapter 44
\$66,520	Family	SHF AETNA HMO 10*	\$2,903.00	\$406.42	\$2,496.58	SHF AETNA HMO 10*	\$2,860.00	\$207.24	\$2,652.76	Chapter 44
\$59,516	Single	SHF AETNA POS 10	\$3,090.00	\$156.12	\$2,933.88	SHF AETNA POS 10	\$3,090.00	\$156.12	\$2,933.88	Chapter 78
\$51,142	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$304.30	\$1,725.70	SHF AETNA HMO 10*	\$2,030.00	\$304.30	\$1,725.70	Chapter 78
\$24,020	Parent / Child	SHF AETNA POS 10	\$2,026.00	\$526.76	\$1,499.24	SHF AETNA POS 10	\$2,026.00	\$203.00	\$1,823.00	Chapter 44
\$90,584	Family	SHF AETNA HMO 10*	\$2,903.00	\$812.84	\$2,090.16	SHF AETNA HMO 10*	\$2,903.00	\$812.84	\$2,090.16	Chapter 78
\$69,256	Family	SHF AETNA POS 10	\$3,116.00	\$592.04	\$2,523.96	SHF AETNA POS 10	\$3,116.00	\$592.04	\$2,523.96	Chapter 78
\$69,932	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$466.90	\$1,563.10	SHF AETNA HMO 10*	\$2,030.00	\$466.90	\$1,563.10	Chapter 78
\$52,884	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$304.30	\$1,725.70	SHF AETNA HMO 10*	\$2,030.00	\$304.30	\$1,725.70	Chapter 78
\$90,000	Family	SHF AETNA HMO 10*	\$2,903.00	\$812.84	\$2,090.16	SHF AETNA HMO 10*	\$2,903.00	\$812.84	\$2,090.16	Chapter 78
\$36,009	Employer / Spouse	HMO 10 - 10%	\$2,030.00	\$203.00	\$1,827.00	HMO 10 - 10%	\$2,030.00	\$203.00	\$1,827.00	Chapter 78
\$85,383	Employer / Spouse	SHF AETNA HMO 10*	\$2,030.00	\$609.00	\$1,421.00	SHF AETNA HMO 10*	\$2,030.00	\$609.00	\$1,421.00	Chapter 78
\$88,830	Family	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10*	\$2,903.00	\$754.78	\$2,148.22	Chapter 78
\$35,500	Employer / Spouse	POS 10 - 10%	\$2,178.00	\$217.90	\$1,960.10	POS 10 - 10%	\$2,178.00	\$217.90	\$1,960.10	Chapter 78
\$36,509	Employer / Spouse	HMO 10 - 10%	\$2,030.00	\$203.00	\$1,827.00	HMO 10 - 10%	\$2,030.00	\$203.00	\$1,827.00	Chapter 78
\$100,283	Family	SHF AETNA POS 10	\$3,116.00	\$997.12	\$2,118.88	SHF AETNA POS 10	\$3,116.00	\$997.12	\$2,118.88	Chapter 78
\$504,631	Single	SHF AETNA POS 10	\$1,090.00	\$381.50	\$708.50	SHF AETNA POS 10	\$1,090.00	\$381.50	\$708.50	Chapter 78
\$104,621	Family	SHF AETNA HMO 10*	\$2,903.00	\$928.96	\$1,974.04	SHF AETNA HMO 10*	\$2,903.00	\$928.96	\$1,974.04	Chapter 78
\$54,504	Parent / Child	SH								

524.865	Single	SHF AETNA POS 10	\$1,090.00	\$59.95	\$1,030.05	SHF AETNA POS 10	\$1,090.00	\$59.95	\$1,030.05	Chapter 78	\$0.00
584.694	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$528.64	\$1,359.36	SHF AETNA HMO 10 *	\$1,888.00	\$528.64	\$1,359.36	Chapter 78	\$0.00
577.530	Family	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	EMP	\$2,860.00	\$355.21	\$2,504.79	Chapter 44	(5105.47)
559.380	Single	SHF AETNA HMO 10 *	\$1,015.00	\$233.45	\$781.55	SHF AETNA HMO 10 *	\$1,015.00	\$233.45	\$781.55	Chapter 78	\$0.00
531.746	Single	SHF AETNA POS 10	\$1,090.00	\$218.00	\$872.00	EMP	\$1,000.00	\$94.87	\$905.13	Chapter 44	(5313.33)
585.488	Parent / Child	SHF AETNA POS 10	\$2,490.00	\$518.00	\$1,972.00	SHF AETNA POS 10	\$2,490.00	\$518.00	\$1,972.00	Chapter 78	\$0.00
511.877	Employer / Spouse	SHF AETNA POS 10	\$2,179.00	\$792.85	\$1,486.15	SHF AETNA POS 10	\$2,179.00	\$792.85	\$1,486.15	Chapter 78	\$0.00
535.509	Family	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	Chapter 78	\$0.00
5106.712	Parent / Child	SHF AETNA POS 10	\$2,026.00	\$709.10	\$1,316.90	SHF AETNA POS 10	\$2,026.00	\$709.10	\$1,316.90	Chapter 78	\$0.00
590.553	Family	SHF AETNA HMO 10 *	\$2,963.00	\$812.84	\$2,090.16	SHF AETNA HMO 10 *	\$2,963.00	\$812.84	\$2,090.16	Chapter 44	(5271.80)
547.398	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$203.00	\$1,827.00	SHF AETNA HMO 10 *	\$2,030.00	\$203.00	\$1,827.00	Chapter 78	\$0.00
551.142	Single	SHF AETNA POS 10	\$1,090.00	\$218.00	\$872.00	EMP	\$1,000.00	\$93.76	\$906.24	Chapter 44	(5141.24)
551.142	Single	SHF AETNA POS 10	\$1,090.00	\$218.00	\$872.00	EMP	\$1,000.00	\$93.76	\$906.24	Chapter 44	(534.24)
552.371	Single	SHF AETNA POS 15	\$1,047.00	\$209.40	\$837.60	EMP	\$1,000.00	\$96.01	\$903.99	Chapter 44	(566.39)
551.746	Family	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	Chapter 78	\$0.00
543.234	Single	SHF AETNA HMO 10 *	\$1,015.00	\$212.80	\$802.20	SHF AETNA HMO 10 *	\$1,015.00	\$212.80	\$802.20	Chapter 78	\$0.00
597.452	Single	SHF AETNA HMO 10 *	\$1,015.00	\$212.80	\$802.20	EMP	\$1,000.00	\$204.63	\$795.37	Chapter 44	(5111.47)
585.383	Family	SHF AETNA HMO 10 *	\$2,903.00	\$290.30	\$2,612.70	EMP	\$2,860.00	\$425.92	\$2,434.08	Chapter 44	(5284.87)
584.694	Family	SHF AETNA HMO 10 *	\$2,903.00	\$696.72	\$2,206.28	EMP	\$2,860.00	\$423.47	\$2,436.53	Chapter 44	(5280.25)
593.885	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$609.00	\$1,421.00	EMP	\$2,000.00	\$469.43	\$1,530.57	Chapter 44	(5130.56)
536.759	Family	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	Chapter 78	\$0.00
541.454	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$151.04	\$1,736.96	SHF AETNA HMO 10 *	\$1,888.00	\$151.04	\$1,736.96	Chapter 78	\$0.00
525.667	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$84.96	\$1,803.04	EMP	\$1,888.00	\$84.96	\$1,803.04	Chapter 78	\$0.00
584.694	Family	SHF AETNA HMO 10 *	\$2,903.00	\$696.72	\$2,206.28	EMP	\$2,860.00	\$423.47	\$2,436.53	Chapter 44	(5280.25)
587.802	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	EMP	\$2,903.00	\$754.78	\$2,148.22	Chapter 78	\$0.00
536.509	Employer / Spouse	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	Chapter 78	\$0.00
524.665	Single	SHF AETNA HMO 10 *	\$1,015.00	\$55.83	\$959.18	EMP	\$1,015.00	\$55.83	\$959.18	Chapter 78	\$0.00
538.550	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$142.10	\$1,887.90	SHF AETNA HMO 10 *	\$2,030.00	\$142.10	\$1,887.90	Chapter 78	\$0.00
586.073	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	Chapter 78	\$0.00
584.694	Family	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	Chapter 44	\$0.00
586.073	Single	SHF AETNA HMO 10 *	\$1,015.00	\$245.10	\$769.90	SHF AETNA HMO 10 *	\$1,015.00	\$245.10	\$769.90	Chapter 78	\$0.00
563.174	Family	SHF AETNA HMO 10 *	\$2,903.00	\$493.53	\$2,409.47	SHF AETNA HMO 10 *	\$2,860.00	\$282.23	\$2,577.78	Chapter 44	(5147.29)
524.665	Family	SHF AETNA HMO 10 *	\$2,903.00	\$87.09	\$2,815.91	EMP	\$2,903.00	\$87.09	\$2,815.91	Chapter 78	\$0.00
544.834	Employer / Spouse	SHF AETNA POS 10	\$2,179.00	\$180.00	\$1,999.00	EMP	\$2,000.00	\$374.15	\$1,625.85	Chapter 44	(5190.90)
586.073	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	EMP	\$2,860.00	\$430.37	\$2,429.64	Chapter 44	(5281.42)
524.665	Parent / Child	SHF AETNA POS 10	\$2,026.00	\$709.10	\$1,316.90	SHF AETNA POS 10	\$2,026.00	\$709.10	\$1,316.90	Chapter 78	\$0.00
535.509	Family	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	SHF AETNA HMO 10 *	\$3,116.00	\$311.60	\$2,804.40	Chapter 78	\$0.00
585.383	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	Chapter 78	\$0.00
523.509	Family	SHF AETNA HMO 10 *	\$2,903.00	\$589.00	\$2,314.00	EMP	\$2,860.00	\$269.63	\$2,590.37	Chapter 44	(5127.71)
536.759	Family	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	POS 10 - 10%	\$3,116.00	\$311.60	\$2,804.40	Chapter 78	\$0.00
574.000	Family	SHF AETNA POS 10	\$3,116.00	\$685.52	\$2,430.48	SHF AETNA POS 10	\$3,116.00	\$685.52	\$2,430.48	Chapter 78	\$0.00
586.073	Family	SHF AETNA POS 10	\$3,116.00	\$716.68	\$2,399.32	EMP	\$2,860.00	\$399.71	\$2,460.29	Chapter 44	\$44.11
585.383	Family	SHF AETNA POS 10	\$3,116.00	\$810.16	\$2,305.84	EMP	\$2,860.00	\$425.92	\$2,434.08	Chapter 44	(5112.23)
552.435	Single	SHF AETNA HMO 10 *	\$1,015.00	\$203.00	\$812.00	EMP	\$1,000.00	\$96.13	\$903.87	Chapter 44	(5151.87)
588.830	Family	SHF AETNA POS 10	\$3,116.00	\$810.16	\$2,305.84	EMP	\$2,860.00	\$444.15	\$2,415.85	Chapter 44	(5110.01)
565.717	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$466.90	\$1,563.10	SHF AETNA HMO 10 *	\$2,030.00	\$466.90	\$1,563.10	Chapter 78	\$0.00
589.774	Employer / Spouse	SHF AETNA POS 10	\$2,179.00	\$501.17	\$1,677.83	EMP	\$2,000.00	\$255.84	\$1,744.16	Chapter 44	(566.33)
588.830	Single	SHF AETNA HMO 10 *	\$1,015.00	\$669.90	\$345.10	EMP	\$1,000.00	\$222.08	\$777.92	Chapter 44	(5108.03)
596.872	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$566.40	\$1,321.60	EMP	\$1,888.00	\$566.40	\$1,321.60	Chapter 78	\$0.00
595.383	Parent / Child	SHF AETNA POS 10	\$3,026.00	\$607.80	\$2,418.20	SHF AETNA POS 10	\$3,026.00	\$607.80	\$2,418.20	Chapter 78	\$0.00
552.658	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$283.20	\$1,604.80	EMP	\$1,888.00	\$283.20	\$1,604.80	Chapter 78	\$0.00
592.802	Family	SHF AETNA POS 10	\$3,116.00	\$824.84	\$2,291.16	EMP	\$2,860.00	\$430.84	\$2,429.16	Chapter 44	(5120.84)
535.509	Employer / Spouse	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	EMP	\$2,000.00	\$82.85	\$1,917.15	Chapter 44	(590.15)
536.009	Employer / Spouse	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	Chapter 78	\$0.00
584.694	Family	SHF AETNA POS 10	\$3,090.00	\$719.40	\$2,370.60	EMP	\$3,000.00	\$211.74	\$2,788.87	Chapter 44	(586.87)
586.073	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$566.40	\$1,321.60	EMP	\$1,888.00	\$566.40	\$1,321.60	Chapter 78	\$0.00
578.509	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$188.80	\$1,699.20	EMP	\$1,888.00	\$188.80	\$1,699.20	Chapter 78	\$0.00
536.759	Employer / Spouse	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	Chapter 78	\$0.00
588.830	Family	SHF AETNA POS 10	\$3,116.00	\$810.16	\$2,305.84	EMP	\$2,860.00	\$444.15	\$2,415.85	Chapter 44	(5110.01)
588.830	Family	SHF AETNA POS 10	\$3,116.00	\$810.16	\$2,305.84	EMP	\$2,860.00	\$444.15	\$2,415.85	Chapter 44	(5110.01)
533.673	Family	SHF AETNA HMO 10 *	\$2,903.00	\$348.36	\$2,554.64	EMP	\$2,903.00	\$348.36	\$2,554.64	Chapter 78	\$0.00
585.383	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	Chapter 78	\$0.00
590.553	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$566.40	\$1,321.60	EMP	\$1,888.00	\$566.40	\$1,321.60	Chapter 78	\$0.00
536.509	Employer / Spouse	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	POS 10 - 10%	\$2,179.00	\$217.90	\$1,961.10	Chapter 78	(524.10)
536.759	Employer / Spouse	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	Chapter 78	\$0.00
531.525	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$113.28	\$1,774.72	EMP	\$1,888.00	\$113.28	\$1,774.72	Chapter 78	\$0.00
588.830	Family	SHF AETNA HMO 10 *	\$2,903.00	\$754.78	\$2,148.22	EMP	\$2,860.00	\$444.15	\$2,415.85	Chapter 44	(5267.60)
587.452	Single	SHF AETNA HMO 10 *	\$1,015.00	\$345.10	\$669.90	EMP	\$1,015.00	\$345.10	\$669.90	Chapter 78	\$0.00
536.759	Employer / Spouse	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	Chapter 78	\$0.00
511.525	Parent / Child	SHF AETNA HMO 10 *	\$1,888.00	\$113.28	\$1,774.72	EMP	\$1,888.00	\$57.80	\$1,830.20	Chapter 44	(527.48)
536.566	Employer / Spouse	SHF AETNA POS 15	\$2,091.00	\$155.81	\$1,935.19	SHF AETNA POS 15	\$2,091.00	\$155.81	\$1,935.19	Chapter 78	\$0.00
532.984	Family	SHF AETNA POS 10	\$3,116.00	\$317.92	\$2,798.08	EMP	\$2,860.00	\$394.27	\$2,465.73	Chapter 44	\$76.36
556.566	Family	SHF AETNA POS 10	\$3,116.00	\$436.24	\$2,679.76	EMP	\$3,116.00	\$436.24	\$2,679.76	Chapter 78	\$0.00
528.900	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$91.85	\$1,938.15	SHF AETNA HMO 10 *	\$2,030.00	\$91.85	\$1,938.15	Chapter 78	\$0.00
584.694	Family	SHF AETNA HMO 10 *	\$2,903.00	\$696.72	\$2,206.28	SHF AETNA HMO 10 *	\$2,903.00	\$696.72	\$2,206.28	Chapter 78	\$0.00
596.299	Employer / Spouse	SHF AETNA POS 20/30	\$2,030.00	\$406.00	\$1,624.00	HMO 10 - 10%	\$2,030.00	\$406.00	\$1,624.00	Chapter 78	\$0.00
599.256	Employer / Spouse	SHF AETNA POS 15	\$2,091.00	\$481.39	\$1,609.61	EMP	\$2,000.00	\$585.94	\$1,414.06	Chapter 44	(5121.40)
578.504	Family	SHF AETNA HMO 10 *	\$2,903.00	\$679.89	\$2,223.11	EMP	\$2,860.00	\$359.81	\$2,500.19	Chapter 44	(5264.88)
5116.300	Employer / Spouse	SHF AETNA HMO 10 *	\$2,030.00	\$710.50	\$1,319.50	SHF AETNA HMO 10 *	\$2,030.00	\$710.50	\$1,319.50	Chapter 78	\$0.00
561.801	Family	SHF AETNA POS 10	\$3,116.00	\$529.72	\$2,586.28	SHF AETNA POS 10	\$3,116.00	\$529.7			

555.141	Employee / Spouse	SHIP AETNA HMO 10 *	\$2,030.00	\$345.10	\$1,684.90	EHP	\$2,000.00	\$179.21	\$1,820.79	Chapter 44	(\$135.89)
536.509	Family	CHMD 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	HMO 10 - 10%	\$2,903.00	\$290.30	\$2,612.70	Chapter 78	\$0.00
584.634	Family	SHIP AETNA HMO 10 *	\$2,903.00	\$696.72	\$2,206.28	EHP	\$2,903.00	\$696.72	\$2,206.28	Chapter 78	\$0.00
578.688	Family	SHIP AETNA POS 15	\$3,116.00	\$716.08	\$2,399.92	EHP	\$2,860.00	\$86.14	\$2,499.87	Chapter 44	(\$94.55)
555.324	Single	SHIP AETNA HMO 10 *	\$1,015.00	\$133.45	\$781.55	EHP	\$1,000.00	\$100.00	\$900.00	Chapter 44	(\$109.49)
559.380	Family	SHIP AETNA POS 15	\$2,993.00	\$419.02	\$2,573.98	SHIP AETNA POS 15	\$2,993.00	\$419.02	\$2,573.98	Chapter 78	\$0.00
552.984	Family	SHIP AETNA HMO 10 *	\$2,903.00	\$348.36	\$2,554.64	EHP	\$2,860.00	\$194.27	\$2,665.73	Chapter 44	(\$111.09)
536.759	Family	POS 10 - 10%	\$1,116.00	\$111.60	\$2,004.40	EHP	\$2,860.00	\$98.71	\$2,761.29	Chapter 44	\$44.11
586.073	Employee / Spouse	SHIP AETNA HMO 10 *	\$2,030.00	\$609.00	\$1,421.00	EHP	\$2,030.00	\$609.00	\$1,421.00	Chapter 78	\$0.00

All Plan Types		All Plan Types	
Total Cost No EHP	\$566,265.00	Total Cost Actual	\$557,200.00
Employee Share No EHP	\$132,410.11	Employee Share Act	\$93,512.13
Net Board Cost No EHP	\$453,854.93	Net Board Cost Act	\$463,688.01
Total Actual Cost	\$463,888.01		
Increase in Actual Cost	\$9,943.08	Monthly Increase	

Salary	EE Share	EE share	Decrease in Co-Share
\$ 60,750	\$526.72	\$253.16	(\$273.56)
\$ 84,000	\$317.84	\$423.47	(\$105.63)
\$ 92,307	\$372.43	\$307.69	(\$64.74)
\$ 115,000	\$1,090.60	\$690.00	(\$400.60)

	Mar-21	No Chapter 44	Actual with Chapter 44	Increase/(Decrease)
Total Cost	\$466,265	\$557,200	(\$90,935)	
Employee Share	\$132,410	\$93,512	(\$38,898)	
Net Board Cost	\$453,855	\$463,688	(\$9,833)	
	Jul-21	No Chapter 44	Actual with Chapter 44	Increase/(Decrease)
Total Cost	\$566,265.00	\$557,200.00	(\$9,065)	
Employee Share	\$132,410.11	\$93,512.13	(\$38,898)	
Net Board Cost	\$453,854.93	\$463,688.01	(\$9,833)	

(\$448)
125768.14

File No. 14357-1

Law Offices

PARKER McCAY P.A.

Frank P. Cavallo, Jr., Esq. (01795-1986)

William C. Morlok, Esq. (01834-2009)

9000 Midlantic Drive, Suite 300

P.O. Box 5054

Mount Laurel, New Jersey 08054

(856) 596-8900

Attorneys for Complainant, Gloucester City Board of Education

**In re Complaint Filed by the
Gloucester City Board of Education
Regarding P.L. 2020, Chapter 44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL MANDATES**

COLM-0001-21

CERTIFICATION OF TERI WEEKS

I, Teri Weeks, School Business Administrator and Board Secretary for the Gloucester City Board of Education, being of full age, do hereby certify as follows:

1. I am the School Business Administrator and Board Secretary for the Gloucester City Board of Education.
2. The data and figures contained in Exhibit A, which is attached Gloucester City Board of Education's Amended Complaint, are true and accurate.

I certify that the foregoing statements made by me are true. I acknowledge that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: 
TERI WEEKS

Dated: July 29, 2021

Exhibit D''

[REDACTED]

From: Schmitz, Donna <Donna.Schmitz@doe.nj.gov>
Sent: Monday, June 28, 2021 3:09 PM
To: Angela Velez (DOE)
Cc: Kevin Dehmer (DOE); Helene Leona (DOE)
Subject: FW: [EXTERNAL] Re: NJEHP & Boonton Town BOE
Attachments: Letter to Sen Sweeney about Ch 44 EHP and SFRA_2021-02-18.pdf

[REDACTED]

From: Schmitz, Donna
Sent: Thursday, February 18, 2021 3:55 PM
To: Dehmer, Kevin <Kevin.Dehmer@doe.nj.gov>; Lubot, Rebecca <Rebecca.Lubot@doe.nj.gov>
Cc: Allen-McMillan, Angelica COMMISSIONER <Angelica.Allen-McMillan@doe.nj.gov>; Leona, Helene <Helene.Leona@doe.nj.gov>
Subject: FW: [EXTERNAL] Re: NJEHP & Boonton Town BOE

[REDACTED]

From: Steven Gardberg <steven.gardberg@boontonschools.org>
Sent: Thursday, February 18, 2021 11:15 AM
To: sensweeney@njleg.org
Cc: senbucco@njleg.org; asmbergen@njleg.org; asmschaer@njleg.org; sensarlo@njleg.org; aswlampitt@njleg.org; senruiz@njleg.org; aswpintormarin@njleg.org; Bruce Sisler <BSisler@njleg.org>; Allen-McMillan, Angelica COMMISSIONER <Angelica.Allen-McMillan@doe.nj.gov>; Dunn, Karen <Karen.Dunn@doe.nj.gov>; Sue Young <Sue@njasbo.com>; Jinks, Roger <Roger.Jinks@doe.nj.gov>; Ryan Tola <rtola@doylealliancegroup.com>; Jonathan Pushman <JPushman@njsba.org>; aswdunn@njleg.org; Robert Presuto <robert.presuto@boontonschools.org>; Irene LeFebvre <irene.lefebvre@boontonschools.org>
Subject: [EXTERNAL] Re: NJEHP & Boonton Town BOE

***** CAUTION *****

This message came from an **EXTERNAL** address (steven.gardberg@boontonschools.org). **DO NOT** click on links or attachments unless you know the sender and the content is safe. **Suspicious?** Forward the message to spamreport@cyber.nj.gov.

Good morning, Senator Sweeney.

As I have shared before, Boonton Town Board of Education is one of the school districts experiencing an immediate, negative financial impact from the required implementation of Chapter 44. Effective January 1, 2021, 45% of employees are in the district's alternative to the New Jersey Educators

Health Plan, increasing the board share for healthcare expenses by \$125k for this fiscal year. For 2021-2022 we are estimating that 60% of employees will be covered by EHP, creating a total EHP burden of \$275k - \$300k.

On top of that, since 2015-2016 Boonton Town has been underfunded by SFRA, ranging from \$916,470 to \$1.5 million -- while local tax levies have been approximately 120% of Local Fair Share. Implementation of S-2 is much appreciated, but the lost opportunities for families in Boonton Town is unfortunate.

The attached letter provides further details and context. Thank you, in advance, for considering the Board of Education's request for immediate legislative/financial relief from Ch. 44 and full SFRA funding to help the families and staff.

Thank you,

Steven Gardberg
School Business Administrator
Boonton Town Board of Education
(973) 335-9700 x8008
steven.gardberg@boontonschools.org

On Thu, Oct 29, 2020 at 8:22 AM Steven Gardberg <steven.gardberg@boontonschools.org> wrote:

Senator Sweeney,

The Boonton Town Board of Education appreciates the goals of Chapter 44 to provide a new level of healthcare benefits for school employees, while lowering the employees' expenses and improving the financial positions of the State and local boards of education. Unfortunately the premise of Ch. 44 being cost-neutral for school boards is elusive at this early point.

The analysis by our healthcare broker shows a significant, negative impact on the board's finances. If every employee switched as of January 1, 2021, the board's share for 12 months would increase by \$600k.

Looking ahead at the 21-22 budget, I am increasingly concerned about the ability to set a balanced budget without staffing cuts. On behalf of the Board of Education, I welcome any further discussion to address the negative financial impact on boards of education.

Thank you for considering the Board's situation -- further detailed in the attached letter mailed this morning.

Steven Gardberg
School Business Administrator
Boonton Town Board of Education
(973) 335-9700 x8008
steven.gardberg@boontonschools.org

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BOONTON

Public Schools

A World Class Education for Tomorrow's Leaders
Office of the Business Administrator

February 18, 2021

Senator Stephen Sweeney
Senate President
935 Kings Highway, Suite 400
West Deptford, NJ 08086

Dear Senator Sweeney,

As I have shared before, Boonton Town Board of Education is one of the school districts experiencing an immediate, negative financial impact from the required implementation of Chapter 44. This is undoing years of working hard with our negotiating units and healthcare broker to provide strong benefits at a good value for all sides.

Effective January 1, 2021, 45% of employees are in the district's alternative to the New Jersey Educators Health Plan, increasing the board share for healthcare expenses by \$125k for this fiscal year. For 2021-2022 we are estimating that 60% of employees will be covered by EHP, creating a total EHP burden of \$275k - \$300k.

The board notified its major unit on December 2, 2020, that it intends to invoke Paragraph 8 of Ch. 44 to address the negative impact on board finances. The obvious, unfortunate area to negotiate is for smaller salary increases (as low as 0%) and any other costs/benefits.

On top of that, Boonton Town has been underfunded by SFRA, ranging from \$916,470 (43% of actual aid in 2019-2020) to \$1.5 million -- while local tax levies since 2015-2016 have been approximately 120% of Local Fair Share. Implementation of S-2 is much appreciated, but the lost opportunities for families in Boonton Town is unfortunate.

The combination of EHP as an unfunded mandate and of being underfunded makes us increasingly concerned about balancing the budget for 2021-2022 without staffing cuts. The Board of Education respectfully requests immediate legislative/financial relief from Ch. 44 and full SFRA funding to help the families and staff.

Sincerely,



Steven Gardberg
School Business Administrator/Board Secretary
steven.gardberg@boontonschool.org

cc: Robert Presuto, Chief School Administrator
Members, Boonton Town Board of Education
Angelica Allen-McMillan, Commissioner, NJ Department of Education
Roger Jinx, Interim Executive County Superintendent, Morris County
Karen Dunn, Executive County Business Official, Morris County
Anthony Bucco, State Senator, 25th District
Brian Bergen, State Assemblyman, 25th District
Aura Dunn, State Assemblywoman, 25th District
Assemblyman Gary Schaer, Education Committee
Senator Paul Sarlo, Senate Budget Chair
Assemblywoman Pamela Lampitt, Chair Education Committee
Senator Teresa Ruiz, Chair Education Committee
Assemblywoman Eliana Pintor Marin, Assembly Budget Chair
Susan Young, Executive Director, NJ Association of School Business Officials
Lawrence Feinsod, PhD, Executive Director, NJ School Boards Association
Ryan Tola, President, NJ Division, Doyle Alliance Group

[REDACTED]

From: Schmitz, Donna <Donna.Schmitz@doe.nj.gov>
Sent: Monday, June 28, 2021 3:15 PM
To: Angela Velez (DOE)
Cc: Kevin Dehmer (DOE)
Subject: FW: NJEHP & Boonton Town BOE

[REDACTED]

[REDACTED]

From: Dehmer, Kevin
Sent: Thursday, October 29, 2020 10:24 AM
To: Sue Young <sue@njasbo.com>; Henry, Scott <Scott.Henry@doe.nj.gov>; Dupree, AllenT <AllenT.Dupree@doe.nj.gov>; Forney, Glenn <Glenn.Forney@doe.nj.gov>
Cc: Loretta Hill <Loretta@njasbo.com>; Allen-McMillan, Angelica <Angelica.Allen-McMillan@doe.nj.gov>
Subject: RE: NJEHP & Boonton Town BOE

Thank you for sharing this, Sue. Let's make sure to sit down and discuss as soon as you are ready – Fiscal Year 2022 is just around the corner already!

Thank you!
Kevin

From: Sue Young <sue@njasbo.com>
Sent: Thursday, October 29, 2020 8:49 AM
To: Dehmer, Kevin <Kevin.Dehmer@doe.nj.gov>; Henry, Scott <Scott.Henry@doe.nj.gov>; Dupree, AllenT <AllenT.Dupree@doe.nj.gov>; Forney, Glenn <Glenn.Forney@doe.nj.gov>
Cc: Loretta Hill <Loretta@njasbo.com>; Allen-McMillan, Angelica <Angelica.Allen-McMillan@doe.nj.gov>
Subject: [EXTERNAL] FW: NJEHP & Boonton Town BOE

***** CAUTION *****

This message came from an **EXTERNAL** address (sue@njasbo.com). **DO NOT** click on links or attachments unless you know the sender and the content is safe. **Suspicious?** Forward the message to spamreport@cyber.nj.gov.

Gentlemen, I'm sure Steve will not mind me forwarding this to you. I wanted to let you know that we are gathering real life examples like Boonton's to share with the appropriate parties. We are waiting a bit to present anything since those in private plans/hifs are just starting their open enrollments. My suspicion from early results is that the negative impacts are going to be more severe for that group since presumably they left the state plan since they could obtain lower premiums outside of the SEHBP. Therefore the differential between their rates and the EHP rates would not offset the significant reduction in contributions should their employees shift to the EHP. One reason that I am bringing this to you at this early juncture is our concern over 2021-2022 budget development. If there is no effective health benefit adjustment and the districts have this significant HB increases it will require devastating cuts to staff or programs with the levy cap. As we compile the data we will share it with you. I wanted to place the issue on your radar for consideration.

Angelica, you will see that Steve copied Karen and Roger so I thought I would make you aware of the issue. Kevin and his staff have been terrific to work with and I'm sure this will be yet another hurdle to be addressed with their assistance.

Susan Young

Executive Director
New Jersey Association of School Business Officials
4 AAA Drive, Suite 101
Robbinsville, NJ 08691
(O) 609-689-3870
Sue@NJASBO.com

Sent from Mail for Windows 10

From: Steven Gardberg
Sent: Thursday, October 29, 2020 8:23 AM
To: sensweeney@njleg.org
Cc: senbucco@njleg.org; asmbergen@njleg.org; asmschaer@njleg.org; sensarlo@njleg.org; aswlpitt@njleg.org; senruiz@njleg.org; aswpintormarin@njleg.org; Bruce Sisler; Angelica Allen-McMillan; Karen Dunn; Sue Young; Roger Jinks; Ryan Tola; Jonathan Pushman
Subject: NJEHP & Boonton Town BOE

Senator Sweeney,

The Boonton Town Board of Education appreciates the goals of Chapter 44 to provide a new level of healthcare benefits for school employees, while lowering the employees' expenses and improving the financial positions of the State and local boards of education. Unfortunately the premise of Ch. 44 being cost-neutral for school boards is elusive at this early point.

The analysis by our healthcare broker shows a significant, negative impact on the board's finances. If every employee switched as of January 1, 2021, the board's share for 12 months would increase by \$600k.

Looking ahead at the 21-22 budget, I am increasingly concerned about the ability to set a balanced budget without staffing cuts. On behalf of the Board of Education, I welcome any further discussion to address the negative financial impact on boards of education.

Thank you for considering the Board's situation -- further detailed in the attached letter mailed this morning.

Steven Gardberg
School Business Administrator
Boonton Town Board of Education
(973) 335-9700 x8008
steven.gardberg@boontonschools.org

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From: Tim Havlusch <thavlusch@hackettstown.org>
Sent: Tuesday, March 23, 2021 11:13 AM
To: Chapter44
Subject: [EXTERNAL] I am sure you are sick of hearing about it.....
Attachments: CHP44 Impact.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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This message came from an **EXTERNAL** address (thavlusch@hackettstown.org). **DO NOT** click on links or attachments unless you know the sender and the content is safe. **Suspicious?** Forward the message to spamreport@cyber.nj.gov.

But in anticipation of the major impact to my particular district as a result of Chapter 44 I, months ago, created a database unique to my district that tracked the costs of benefits and the contributions under Chapter 44 and its overall impact.

In a nutshell Chapter 44 is costing my district for the balance of the 20-21 SY (Jan through June), in excess of 90k when comparing lost contributions to the modest reduction in premiums. This amount has to be made up from other lines in the budget.

The attached report deals with all of the employees who made an affirmative selection to change their plan from the current offerings available as of 12/31/2020 to the new EHP plan offered by Horizon. There is one outlying data point that I need to examine.

The report shows year over year variance when comparing premium costs and contribution rates before and after their selection. The total year over year loss to the district is in excess of \$181,000 which is why my six month loss is in excess of 90K.

I have been planning this anticipated impact for close to a year and I know the specifics in my district to the penny however the attempt at data collection on Homeroom is deficient in so many areas it doesn't allow for the proper investigation of the figures unique to each individual district.

Sorry just needed to vent.

--

Timothy Havlusch

**Business Administrator/Board Secretary
Hackettstown School District
315 Washington Street
Hackettstown, NJ 07840
Phone 908-852-2800
Fax 908-852-0826**



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NAME	SAL	44 BENFIT COST	% Contrib	78 BENEFITS	ANNUAL	78 Contrib	44 Contrib	VARIANCE
	\$74,905.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,119.78	(\$2,723.66)
	\$65,265.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,631.63	(\$1,897.64)
	\$68,265.00	\$2,358.42	4.4	\$1,014.16	\$12,169.90	\$2,799.08	\$3,003.66	\$204.58
	\$72,315.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$3,977.33	(\$2,866.11)
	\$78,790.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$7,154.50	\$4,333.45	(\$2,821.05)
	\$48,094.00	\$2,453.37	3.9	\$2,592.21	\$31,106.52	\$2,799.59	\$1,875.67	(\$923.92)
	\$71,020.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$3,906.10	(\$2,937.33)
	\$67,855.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,392.75	(\$2,517.49)
	\$88,365.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$8,087.70	\$5,301.90	(\$2,785.80)
	\$68,265.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,706.63	(\$1,822.64)
	\$84,655.00	\$2,358.42	5.5	\$2,592.21	\$31,106.52	\$8,709.83	\$4,656.03	(\$4,053.80)
	\$84,855.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$5,091.30	(\$2,374.26)
	\$89,655.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$8,087.70	\$5,379.30	(\$2,708.40)
	\$69,150.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,457.50	(\$2,452.74)
	\$84,345.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$5,060.70	(\$2,404.86)
	\$87,305.00	\$2,358.42	5.5	\$2,592.21	\$31,106.52	\$9,331.96	\$4,801.78	(\$4,530.18)
	\$74,330.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,088.15	(\$2,755.28)
	\$89,555.00	\$963.83	3	\$1,014.16	\$12,169.90	\$4,137.76	\$2,686.65	(\$1,451.11)
	\$89,355.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$8,087.70	\$5,361.30	(\$2,726.40)
	\$73,610.00	\$2,358.42	5	\$2,491.89	\$29,902.68	\$7,774.70	\$3,680.50	(\$4,094.20)
	\$90,956.00	\$2,453.37	6.6	\$2,592.21	\$31,106.52	\$8,709.83	\$6,003.10	(\$2,706.73)
	\$80,085.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,805.10	(\$2,660.46)
	\$89,455.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$8,087.70	\$5,367.30	(\$2,720.40)
	\$77,975.00	\$2,358.42	5	\$2,491.89	\$29,902.68	\$8,073.72	\$3,898.75	(\$4,174.97)
	\$79,645.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$4,016.07	\$2,230.06	(\$1,786.01)
	\$69,150.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,457.50	(\$2,452.74)
	\$61,215.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,288.11	\$3,060.75	(\$2,227.36)
	\$73,610.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$3,894.37	\$2,061.08	(\$1,833.29)
	\$69,765.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,488.25	(\$2,421.99)
	\$68,265.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,706.63	(\$1,822.64)
	\$82,505.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,950.30	(\$2,515.26)
	\$73,610.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$3,894.37	\$2,061.08	(\$1,833.29)
	\$61,215.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,285.87	\$1,530.38	(\$1,755.50)
	\$69,965.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,749.13	(\$1,780.14)
	\$67,855.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,392.75	(\$2,517.49)

NAME	SAL	44 BENFIT COST	% Contrib	78 BENEFITS	ANNUAL	78 Contrib	44 Contrib	VARIANCE
	\$69,765.00	\$963.83	2.5	\$872.94	\$10,475.28	\$3,037.83	\$1,744.13	(\$1,293.71)
	\$66,560.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,328.00	(\$2,582.24)
	\$72,315.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$3,977.33	(\$2,866.11)
	\$74,330.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,088.15	(\$2,755.28)
	\$74,330.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,088.15	(\$2,755.28)
	\$87,005.00	\$963.83	3	\$1,014.16	\$12,169.90	\$4,137.76	\$2,610.15	(\$1,527.61)
	\$73,610.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,048.55	(\$2,794.88)
	\$82,505.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,950.30	(\$2,515.26)
	\$84,345.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$5,060.70	(\$2,404.86)
	\$84,345.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$5,060.70	(\$2,404.86)
	\$73,035.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$3,894.37	\$2,044.98	(\$1,849.39)
	\$81,140.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,868.40	(\$2,597.16)
	\$97,032.00	\$2,453.37	6.6	\$2,635.59	\$31,627.08	\$9,171.85	\$6,404.11	(\$2,767.74)
	\$79,065.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$7,154.50	\$4,348.58	(\$2,805.92)
	\$76,200.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$7,154.50	\$4,191.00	(\$2,963.50)
	\$62,215.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,285.87	\$1,555.38	(\$1,730.50)
	\$89,355.00	\$1,569.54	3.6	\$1,658.36	\$19,900.32	\$5,970.10	\$3,216.78	(\$2,753.32)
	\$69,795.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,744.88	(\$1,784.39)
	\$61,715.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,285.87	\$1,542.88	(\$1,743.00)
	\$81,380.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,882.80	(\$2,582.76)
	\$62,715.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,285.87	\$1,567.88	(\$1,718.00)
	\$77,975.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$7,154.50	\$4,288.63	(\$2,865.87)
	\$87,105.00	\$1,569.54	3.6	\$1,658.36	\$19,900.32	\$5,970.10	\$3,135.78	(\$2,834.32)
	\$65,065.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,578.58	(\$2,331.66)
	\$79,030.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$4,016.07	\$2,212.84	(\$1,803.23)
	\$73,370.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$6,843.43	\$4,035.35	(\$2,808.08)
	\$89,555.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$8,087.70	\$5,373.30	(\$2,714.40)
	\$91,805.00	\$2,453.37	6.6	\$2,592.21	\$31,106.52	\$8,709.83	\$6,059.13	(\$2,650.70)
	\$89,455.00	\$1,569.54	3.6	\$1,658.36	\$19,900.32	\$5,970.10	\$3,220.38	(\$2,749.72)
	\$71,740.00	\$963.83	2.8	\$1,014.16	\$12,169.90	\$3,894.37	\$2,008.72	(\$1,885.65)
	\$82,605.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,956.30	(\$2,509.26)
	\$89,655.00	\$2,358.42	5.5	\$2,491.89	\$29,902.68	\$8,970.80	\$4,931.03	(\$4,039.78)
	\$61,215.00	\$2,453.37	5	\$2,490.33	\$29,883.96	\$5,080.27	\$3,060.75	(\$2,019.52)
	\$65,265.00	\$963.83	2.5	\$1,014.16	\$12,169.90	\$3,529.27	\$1,631.63	(\$1,897.64)
	\$78,965.00	\$2,453.37	5.5	\$2,592.21	\$31,106.52	\$7,154.50	\$4,343.08	(\$2,811.42)
	\$68,661.00	\$1,569.54	3	\$1,686.12	\$20,233.44	\$4,653.69	\$2,059.83	(\$2,593.86)

NAME	SAL	44 BENFIT COST	% Contrib	78 BENEFITS	ANNUAL	78 Contrib	44 Contrib	VARIANCE
	\$81,140.00	\$2,453.37	6	\$2,592.21	\$31,106.52	\$7,465.56	\$4,868.40	(\$2,597.16)
	\$89,555.00	\$1,569.54	3.6	\$1,658.36	\$19,900.32	\$5,970.10	\$3,223.98	(\$2,746.12)
	\$69,795.00	\$2,453.37	5	\$2,592.21	\$31,106.52	\$5,910.24	\$3,489.75	(\$2,420.49)
		\$148,259.27		\$155,120.33		\$450,400.70	\$269,075.45	(\$181,325.25)

From: Melissa Burns <mburns@spfk12.org>
Sent: Thursday, March 25, 2021 2:27 PM
To: Chapter44
Cc: Deborah Saridaki; Carmelina Januszanis
Subject: [EXTERNAL] Re: Scotch Plains-Fanwood Board of Education Chapter 44 Reporting

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Good Afternoon,

I apologize, I would like to correct the following statement: With the new NJEHP medical plan, there was a decrease in employee deductions in the amount of \$300,764.79. If the NJEHP plan had not been put into place, employee deductions would have been much smaller. That statement should have read: If the NJEHP plan had not been put into place, the **difference** in employee deductions would have been much smaller. Rather than having a decrease in employee deductions, our total employee deductions in 2020-2021 would have been about the same as they were in the 2019-2020 School Year.

Therefore, the district's total costs and the district's total net costs should have both decreased by approximately \$528,269.50. Since the district's total net costs decreased by only \$227,504.71, we lost approximately \$300,764.79 in the 2020-2021 School Year.

Thank you!

Sincerely,

Melissa Burns
Business Office, Pensions and Benefits

Scotch Plains-Fanwood Board of Education
512 Cedar Street
Scotch Plains, NJ 07076
P: 908-232-6161 ext 41308
F: 908-889-1769

On Thu, Mar 25, 2021 at 2:00 PM Melissa Burns <mburns@spfk12.org> wrote:
Good Afternoon,

We submitted the Chapter 44 reporting for Scotch Plains-Fanwood Board of Education on 03/22/2021, however we would like to clarify regarding the net cost difference between the 2019-2020 and 2020-2021 School Years.

According to the figures, our district had a \$227,504.71 decrease in net costs from the 2019-2020 to the 2020-2021 School Year. At first glance, it appears that the district had a cost savings across the two school years, however we do not believe that we had a cost savings. Please see below is our analysis of the differences:

Total Annual Cost difference: -\$528,269.50
Total Employee Deductions difference: -\$300,764.79
Total Net Cost difference: -\$227,504.71

Our district had a 0% increase in our medical insurance rates from 2019-2020 to 2020-2021. In addition, we had approximately 8 less employees enrolled in medical coverage in the 2020-2021 School Year. Since our insurance rates did not change and we had a very small employee count decrease, if the NJEHP plan had not been put into place the only factors that would have affected our net costs would be employees who were hired or left employment and employees who had a change in salary that affected their payroll deductions. Therefore, the district's total and net cost differences should have been very close to the total cost difference of \$528,269.50.

With the new NJEHP medical plan, there was a decrease in employee deductions in the amount of \$300,764.79. If the NJEHP plan had not been put into place, employee deductions would have been much smaller.

In addition, the total cost calculation of number of employees multiplied by the total annual cost of the plan results in inaccurate information. There is no way to capture employees who were hired or resigned mid-year or had a plan or plan type change throughout the year. In future years, would it be possible to allow for fractions of employees, or to allow districts to use the total costs from the invoices received from insurance providers?

Please let me know if you have any questions!

Thank you!

Sincerely,

Melissa Burns
Business Office, Pensions and Benefits

Scotch Plains-Fanwood Board of Education
512 Cedar Street
Scotch Plains, NJ 07076
P: 908-232-6161 ext 41308
F: 908-889-1769

Exhibit G

”

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
ABSECON CITY	1968053.09	ABSECON CITY	1887750.02
ALEXANDRIA TWP	1382400	ALEXANDRIA TWP	1344437
ALLAMUCHY TWP	817039.6	ALLAMUCHY TWP	987864.73
ALLENDALE BORO	2308307	ALLENDALE BORO	2116982
ALLENHURST	0	ALLENHURST	0
ALLOWAY TWP	557634.12	ALLOWAY TWP	466573.68
ALPHA BORO	839099	ALPHA BORO	902562
ALPINE BORO	602202.13	ALPINE BORO	572003.56
ANDOVER REG	958156	ANDOVER REG	892688
ASBURY PARK CITY	8195316	ASBURY PARK CITY	0
ATLANTIC CITY	14495401.74	ATLANTIC CITY	13694481.3
ATLANTIC CO VOCATIONAL	627783.94	ATLANTIC CO VOCATIONAL	301364.38
ATLANTIC CO SPECIAL SERV	4387795.51	ATLANTIC CO SPECIAL SERV	4140403.82
ATLANTIC HIGHLANDS BORO	780580.86	ATLANTIC HIGHLANDS BORO	812230.8
Audubon Public School Disrict	0	Audubon Public School Disrict	0
AUDUBON PARK BORO	0	AUDUBON PARK BORO	0
AVALON BORO	514592.66	AVALON BORO	477109.84
AVON BORO	462698.88	AVON BORO	440592.22
BARNEGAT TWP	0	BARNEGAT TWP	0
BARRINGTON BORO	1316821.2	BARRINGTON BORO	1406814.12
BASS RIVER TWP	0	BASS RIVER TWP	0
BAY HEAD BORO	301486.23	BAY HEAD BORO	306159.38
BAYONNE CITY	16359178.27	BAYONNE CITY	15924009.39
BAYSHORE JOINTURE COMM	655894.1	BAYSHORE JOINTURE COMM	673299.49
BEACH HAVEN BORO	382300.03	BEACH HAVEN BORO	364860.89
BEDMINSTER TWP	1382252.4	BEDMINSTER TWP	2100957.55
BELLEVILLE TOWN	7163125.99	BELLEVILLE TOWN	6012307.76
BELLMAWR BORO	2042793.21	BELLMAWR BORO	2246619.64
BELMAR BORO	1289442.98	BELMAR BORO	1341665.7
BELVIDERE TOWN	1536505	BELVIDERE TOWN	1581538
BERGEN CO SPECIAL SERVICE	12717646.47	BERGEN CO SPECIAL SERVICE	12508226.33

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
Bergen County Vocational Technical School District	6879429.26	Bergen County Vocational Technical School District	6512535.54
BERGENFIELD BORO	7803716.59	BERGENFIELD BORO	7328833.97
BERKELEY HEIGHTS TWP	5708456.64	BERKELEY HEIGHTS TWP	6413740.54
BERKELEY TWP	5949651.76	BERKELEY TWP	5877422.57
BERLIN BORO	1568747.85	BERLIN BORO	814400.78
BERLIN TWP	689156	BERLIN TWP	628788
BERNARDS TWP	12107875.92	BERNARDS TWP	13849061.91
BETHLEHEM TWP	1367540.03	BETHLEHEM TWP	1548623.41
BEVERLY CITY	840201.89	BEVERLY CITY	822518.11
BLACK HORSE PIKE REGIONAL	7320990.91	BLACK HORSE PIKE REGIONAL	7697963.36
BLAIRSTOWN TWP	742084.8	BLAIRSTOWN TWP	794148.12
BLOOMFIELD TWP	14178717.48	BLOOMFIELD TWP	14733340.12
BLOOMINGDALE BORO	0	BLOOMINGDALE BORO	0
BLOOMSBURY BORO	401659	BLOOMSBURY BORO	441197
BOGOTA BORO	2501484.48	BOGOTA BORO	2581229.86
BOONTON TOWN	4322091	BOONTON TOWN	4308791
BOONTON TWP	1223316	BOONTON TWP	1160613.12
BORDENTOWN REGIONAL	5252100.7	BORDENTOWN REGIONAL	5527433.71
BOUND BROOK BORO	3871165.99	BOUND BROOK BORO	4169789.92
BRADLEY BEACH BORO	845777.23	BRADLEY BEACH BORO	883769.09
BRANCHBURG TWP	4862481.6	BRANCHBURG TWP	5268735.44
BRICK TWP	23117853.89	BRICK TWP	24546646.14
BRIDGETON CITY	17610434.94	BRIDGETON CITY	17649591.58
BRIDGEWATER-RARITAN REG	19735224	BRIDGEWATER-RARITAN REG	20236655
BRIELLE BORO	950932.78	BRIELLE BORO	1039562.08
BRIGANTINE CITY	1939701.6	BRIGANTINE CITY	1933321.72
BROOKLAWN BORO	0	BROOKLAWN BORO	0
BUENA REGIONAL	4811259.13	BUENA REGIONAL	4490413.69
BURLINGTON CITY	4530212.52	BURLINGTON CITY	0
BURLINGTON CO SPEC SERV	7935419.28	BURLINGTON CO SPEC SERV	8553312.53
BURLINGTON CO VOCATIONAL	5548995.4	BURLINGTON CO VOCATIONAL	5622405.84

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
BURLINGTON TWP	6661343.79	BURLINGTON TWP	6978112.7
BUTLER BORO	0	BUTLER BORO	0
BYRAM TWP	1668212	BYRAM TWP	1578451.17
CALDWELL-WEST CALDWELL	5774677.58	CALDWELL-WEST CALDWELL	5873226.36
CALIFON BORO	356726.2	CALIFON BORO	364275.98
CAMDEN CITY	0	CAMDEN CITY	0
CAMDEN CO ED SERV COMM	1456399.96	CAMDEN CO ED SERV COMM	1643903.76
CAMDEN COUNTY VOCATIONAL	5801202.29	CAMDEN COUNTY VOCATIONAL	5441039.26
CAPE MAY CITY	482424	CAPE MAY CITY	495310
CAPE MAY CO SPECIAL SERV	2433137	CAPE MAY CO SPECIAL SERV	2142648
Cape May County Vocational School District	2324164.17	Cape May County Vocational School District	2179964.6
CAPE MAY POINT	0	CAPE MAY POINT	0
CARLSTADT BORO	1433196.32	CARLSTADT BORO	1504237.04
CARLSTADT-EAST RUTHERFORD	1119913.56	CARLSTADT-EAST RUTHERFORD	1401306.78
CARTERET BORO	0	CARTERET BORO	0
CEDAR GROVE TWP	0	CEDAR GROVE TWP	0
CENTRAL REGIONAL	4812919.4	CENTRAL REGIONAL	4859864.44
SCH DIST OF THE CHATHAMS	7399269.12	SCH DIST OF THE CHATHAMS	8225872.84
CHERRY HILL TWP	27004428.74	CHERRY HILL TWP	29319622.65
CHESILHURST	0	CHESILHURST	0
CHESTER TWP	2920743.09	CHESTER TWP	3160150.55
CHESTERFIELD TWP	1318037.15	CHESTERFIELD TWP	1479194.3
CINNAMINSON TWP	4923275	CINNAMINSON TWP	5298053.23
CLARK TWP	3782088	CLARK TWP	4434215
CLAYTON BORO	2744893.48	CLAYTON BORO	1415174.76
CLEARVIEW REGIONAL	3840509.36	CLEARVIEW REGIONAL	4127266.64
CLEMENTON BORO	0	CLEMENTON BORO	0
CLIFFSIDE PARK BORO	7827989.18	CLIFFSIDE PARK BORO	5429039.05
CLIFTON CITY	0	CLIFTON CITY	42859839.84
CLINTON-GLEN GARDNER	1199818	CLINTON-GLEN GARDNER	1259640
CLINTON TWP	4821223.53	CLINTON TWP	4450401.32

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
CLOSTER BORO	2375645.94	CLOSTER BORO	2308594.18
COLLINGSWOOD BORO	5255960	COLLINGSWOOD BORO	5661683.88
COLTS NECK TWP	3431219.48	COLTS NECK TWP	3206086.58
COMMERCIAL TWP	820400.71	COMMERCIAL TWP	827799.76
CORBIN CITY	0	CORBIN CITY	0
CRANBURY TWP	1692607.69	CRANBURY TWP	1778085.29
CRANFORD TWP	9351257.48	CRANFORD TWP	8677134.55
CRESSKILL BORO	3546926.24	CRESSKILL BORO	3433086.96
CUMBERLAND CO VOCATIONAL	1560667.27	CUMBERLAND CO VOCATIONAL	1733234.79
CUMBERLAND REGIONAL	1813026.74	CUMBERLAND REGIONAL	1872654.64
DEAL BORO	568016.56	DEAL BORO	475681.32
DEERFIELD TWP	685857.35	DEERFIELD TWP	723829.44
DELANCO TWP	897645.67	DELANCO TWP	0
DELAWARE TWP	1245774.91	DELAWARE TWP	1124008.02
DELAWARE VALLEY REGIONAL	2097364.42	DELAWARE VALLEY REGIONAL	2124823.94
DELTRAN TWP	6249034.94	DELTRAN TWP	6273546.09
DEMAREST BORO	1906640.74	DEMAREST BORO	1875324.85
DENNIS TWP	1175373.84	DENNIS TWP	1411477
DENVILLE TWP	3512927.75	DENVILLE TWP	3858385.3
DEPTFORD TWP	8804065.28	DEPTFORD TWP	8981883
DOVER TOWN	5051074.16	DOVER TOWN	7576981.13
DOWNE TWP	669826.79	DOWNE TWP	567061.67
DUMONT BORO	5365066.44	DUMONT BORO	4889799.18
DUNELLEN BORO	2565634.38	DUNELLEN BORO	2717378.13
EAGLESWOOD TWP	424164.75	EAGLESWOOD TWP	429927.47
EAST AMWELL TWP	992236.96	EAST AMWELL TWP	1241370.95
EAST BRUNSWICK TWP	20286746.28	EAST BRUNSWICK TWP	20855256.75
EAST GREENWICH TWP	2219729.4	EAST GREENWICH TWP	2242662.23
EAST HANOVER TWP	2653260.24	EAST HANOVER TWP	2694904.99
EAST NEWARK BORO	311239	EAST NEWARK BORO	339006
EAST ORANGE	0	EAST ORANGE	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
EAST RUTHERFORD BORO	1900565.58	EAST RUTHERFORD BORO	2430688.98
EAST WINDSOR REGIONAL	9443216.75	EAST WINDSOR REGIONAL	11414398.71
EASTAMPTON TWP	0	EASTAMPTON TWP	0
EASTERN CAMDEN COUNTY REG	3462868.72	EASTERN CAMDEN COUNTY REG	4315043.52
EATONTOWN BORO	2526610.27	EATONTOWN BORO	2721594.27
EDGEWATER BORO	1839321.5	EDGEWATER BORO	1236360.48
EDGEWATER PARK TWP	1053339.74	EDGEWATER PARK TWP	1082911.15
EDISON TWP	30072696.84	EDISON TWP	30717802.32
Educational Information and Resource Center	0	Educational Information and Resource Center	0
EGG HARBOR CITY	1188818.36	EGG HARBOR CITY	1344766.24
EGG HARBOR TWP	21482210.16	EGG HARBOR TWP	21665417.02
ELIZABETH CITY	0	ELIZABETH CITY	0
ELK TWP	426145.95	ELK TWP	410384.51
ELMWOOD PARK	4933568	ELMWOOD PARK	4885674
ELSINBORO TWP	283594.55	ELSINBORO TWP	307679.68
EMERSON BORO	2927595.5	EMERSON BORO	2846733.82
ENGLEWOOD CITY	5614025	ENGLEWOOD CITY	5433593
SOUTH HUNTERDON REGIONAL SCHOOL DISTRICT	2539328.74	SOUTH HUNTERDON REGIONAL SCHOOL DISTRICT	2511502.9
ENGLEWOOD CLIFFS BORO	1785622	ENGLEWOOD CLIFFS BORO	2289379.97
ESSEX CO ED SERV COMM	0	ESSEX CO ED SERV COMM	0
ESSEX CO VOC-TECH	0	ESSEX CO VOC-TECH	0
ESSEX FELLS BORO	606373.88	ESSEX FELLS BORO	562945
ESTELL MANOR CITY	0	ESTELL MANOR CITY	0
EVESHAM TWP	23270286.21	EVESHAM TWP	14182228.93
EWING TWP	0	EWING TWP	0
Katzenbach	0	Katzenbach	0
FAIR HAVEN BORO	2537269.75	FAIR HAVEN BORO	2858095.9
Fair Lawn Public Schools	10854047.02	Fair Lawn Public Schools	10376162.23
FAIRFIELD TWP	2451905.2	FAIRFIELD TWP	2559504.21
FAIRVIEW BORO	2802763.82	FAIRVIEW BORO	2301186.7
FARMINGDALE BORO	309448	FARMINGDALE BORO	335815.14

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
FLEMINGTON-RARITAN REG	8095415.63	FLEMINGTON-RARITAN REG	7407043.9
FLORENCE TWP	2981077.28	FLORENCE TWP	3066767.16
FLORHAM PARK BORO	3080940	FLORHAM PARK BORO	3141136
FOLSOM BORO	940495.36	FOLSOM BORO	988713.96
FORT LEE BORO	8899872.81	FORT LEE BORO	7820846.95
FRANKFORD TWP	1198684	FRANKFORD TWP	1259768
FRANKLIN BORO	1236870.96	FRANKLIN BORO	1414759.2
FRANKLIN LAKES BORO	4759919.63	FRANKLIN LAKES BORO	4492592.34
FRANKLIN TWP	5188399.94	FRANKLIN TWP	5608434.4
FREDON TWP	588779.85	FREDON TWP	611754.63
FREEHOLD BORO	0	FREEHOLD BORO	0
FREEHOLD REGIONAL	23280246.96	FREEHOLD REGIONAL	22863215.83
FREEHOLD TWP	12738359	FREEHOLD TWP	13453335
FRELINGHUYSEN TWP	179365	FRELINGHUYSEN TWP	222586
FRENCHTOWN BORO	485703.48	FRENCHTOWN BORO	464788.79
GALLOWAY TWP	7385395.32	GALLOWAY TWP	7904200.98
GARFIELD CITY	12876181.32	GARFIELD CITY	12451100.24
GARWOOD BORO	48432.68	GARWOOD BORO	2574.26
GATEWAY REGIONAL	0	GATEWAY REGIONAL	0
GIBBSBORO BORO	799385.21	GIBBSBORO BORO	859200.05
GLASSBORO	0	GLASSBORO	0
GLEN RIDGE BORO	3646662.6	GLEN RIDGE BORO	3890026.54
GLEN ROCK BORO	5654929.01	GLEN ROCK BORO	4923317.28
GLOUCESTER CITY	5492024.52	GLOUCESTER CITY	5534005.6
GLOUCESTER CO SPEC SERV	9390176.48	GLOUCESTER CO SPEC SERV	8928736.76
GLOUCESTER CO VOCATIONAL	3107670.04	GLOUCESTER CO VOCATIONAL	2988728.96
GLOUCESTER TWP	15025991.56	GLOUCESTER TWP	16950205.14
GREAT MEADOWS REGIONAL	1690260	GREAT MEADOWS REGIONAL	1817506
GREATER EGG HARBOR REG	6352580.22	GREATER EGG HARBOR REG	6469233.65
KIPP: Cooper Norcross, A New Jersey Nonprofit Corporation	0	KIPP: Cooper Norcross, A New Jersey Nonprofit Corporation	0
GREEN TWP	970157.05	GREEN TWP	1183601.88

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
Camden Prep, Inc.	0	Camden Prep, Inc.	0
Mastery Schools of Camden, Inc.	0	Mastery Schools of Camden, Inc.	0
GREEN BROOK TWP	2093323.82	GREEN BROOK TWP	2217863.48
GREENWICH TWP	3013779.44	GREENWICH TWP	3108598.76
GUTTENBERG TOWN	2152689.52	GUTTENBERG TOWN	2004306.64
HACKENSACK CITY	12099995.81	HACKENSACK CITY	11148812.57
HACKETTSTOWN	600270	HACKETTSTOWN	0
HADDON HEIGHTS BORO	3206046.73	HADDON HEIGHTS BORO	3128125.19
HADDON TWP	4822483	HADDON TWP	2477677
HADDONFIELD BORO	4794707.49	HADDONFIELD BORO	4754569.17
HAINESPORT TWP	1274731.11	HAINESPORT TWP	1202683.15
HALEDON BORO	2407009.04	HALEDON BORO	2259661.6
HAMBURG BORO	802641.42	HAMBURG BORO	750710.47
HAMILTON TWP	33108017.12	HAMILTON TWP	35373121.93
HAMMONTON TOWN	5825036.66	HAMMONTON TOWN	5767487.32
HAMPTON BORO	352473.54	HAMPTON BORO	320971.27
HAMPTON TWP	869819.1	HAMPTON TWP	813663.88
HANOVER PARK REGIONAL	4954611.88	HANOVER PARK REGIONAL	5000800.74
HANOVER TWP	0	HANOVER TWP	0
HARDING TOWNSHIP	847616.24	HARDING TOWNSHIP	1048029.11
HARDYSTON TWP	1265127.72	HARDYSTON TWP	1337313.86
HARMONY TWP	616968.82	HARMONY TWP	605703.51
HARRINGTON PARK BORO	1957609.61	HARRINGTON PARK BORO	1838399.54
HARRISON TOWN	5868951.62	HARRISON TOWN	5810367.6
HARRISON TWP	1982984.62	HARRISON TWP	2062116.67
HASBROUCK HEIGHTS BORO	3674071.36	HASBROUCK HEIGHTS BORO	3495065.28
HAWORTH BORO	1012550.08	HAWORTH BORO	1122113
HAWTHORNE BORO	5113313.92	HAWTHORNE BORO	5009444.73
HAZLET TWP	7922992.58	HAZLET TWP	8152336.72
HENRY HUDSON REGIONAL	894226.02	HENRY HUDSON REGIONAL	990345.07
HI NELLA	0	HI NELLA	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
HIGH BRIDGE BORO	1118269.15	HIGH BRIDGE BORO	1260827.98
HIGHLAND PARK BORO	0	HIGHLAND PARK BORO	0
HIGHLANDS BORO	527960.49	HIGHLANDS BORO	516260.71
HIGH POINT REGIONAL	0	HIGH POINT REGIONAL	0
HILLSBOROUGH TWP	17939603.44	HILLSBOROUGH TWP	17724849.31
HILLSDALE BORO	2650239.77	HILLSDALE BORO	2434802.17
HILLSIDE TWP	0	HILLSIDE TWP	0
HO HO KUS BORO	1410452.64	HO HO KUS BORO	1501728.15
HOBOKEN CITY	6758033.93	HOBOKEN CITY	6865379.31
HOLLAND TWP	1751191.07	HOLLAND TWP	1816919.47
HOLMDEL TWP	20543473.24	HOLMDEL TWP	9549098.11
HOPATCONG	0	HOPATCONG	0
HOPE TWP	349636.8	HOPE TWP	349723.13
HOPEWELL TWP	547167.44	HOPEWELL TWP	620438.24
HOPEWELL VALLEY REGIONAL	11356428.09	HOPEWELL VALLEY REGIONAL	11400427.59
HOWELL TWP	15806465.39	HOWELL TWP	0
HUDSON COUNTY VOCATIONAL	7679591	HUDSON COUNTY VOCATIONAL	7482709
HUNTERDON CENTRAL REG	14075989.32	HUNTERDON CENTRAL REG	21862807.14
HUNTERDON CO ED SER COMM	1165731.28	HUNTERDON CO ED SER COMM	1500219.04
HUNTERDON CO VOCATIONAL	603430.46	HUNTERDON CO VOCATIONAL	651571.36
INTERLAKEN	0	INTERLAKEN	0
IRVINGTON TOWNSHIP	0	IRVINGTON TOWNSHIP	0
ISLAND HEIGHTS BORO	368510.42	ISLAND HEIGHTS BORO	360282.32
JACKSON TWP	0	JACKSON TWP	0
JAMESBURG BORO	1321858.52	JAMESBURG BORO	1330329
JEFFERSON TWP	7812167.6	JEFFERSON TWP	7916100.26
JERSEY CITY	0	JERSEY CITY	0
KEANSBURG BORO	0	KEANSBURG BORO	0
KEARNY TOWN	579227.06	KEARNY TOWN	868034.5
KENILWORTH BORO	1585615	KENILWORTH BORO	1541284
KEYPORT BORO	3002971.31	KEYPORT BORO	3058091.8

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
KINGSWAY REGIONAL	3786057.27	KINGSWAY REGIONAL	3884676.88
KINGWOOD TWP	1058567.05	KINGWOOD TWP	1065558.48
KINNELON BORO	4467125.69	KINNELON BORO	4267536
KITTATINNY REGIONAL	2517114.69	KITTATINNY REGIONAL	2458566.56
KNOWLTON TWP	455184.24	KNOWLTON TWP	489541.57
LACEY TWP	99	LACEY TWP	0
LAFAYETTE TWP	419677	LAFAYETTE TWP	450162
LAKEHURST BORO	777367.32	LAKEHURST BORO	790804.59
LAKELAND REGIONAL	193862.19	LAKELAND REGIONAL	0
LAKEWOOD TWP	20465877.27	LAKEWOOD TWP	19696057.69
LAUREL SPRINGS BORO	0	LAUREL SPRINGS BORO	0
LAVALLETTE BORO	362107.39	LAVALLETTE BORO	349358.6
LAWNSIDE BORO	519077.15	LAWNSIDE BORO	543562.08
LAWRENCE TWP	9861052.13	LAWRENCE TWP	10374312.86
LEBANON BORO	344858	LEBANON BORO	413055.6
LEBANON TWP	2038429.91	LEBANON TWP	2254192.27
LENAPE REGIONAL	0	LENAPE REGIONAL	0
LENAPE VALLEY REGIONAL	0	LENAPE VALLEY REGIONAL	0
LEONIA BORO	4474183.9	LEONIA BORO	4251365.19
LINCOLN PARK BORO	2073168.55	LINCOLN PARK BORO	2131056
LINDEN CITY	15775204.81	LINDEN CITY	16173112.01
LINDENWOLD BORO	6327594.04	LINDENWOLD BORO	6344416.04
LINWOOD CITY	2337617.74	LINWOOD CITY	2141605.68
LITTLE EGG HARBOR TWP	0	LITTLE EGG HARBOR TWP	0
LITTLE FALLS TWP	2056680.74	LITTLE FALLS TWP	2346089.43
LITTLE FERRY BORO	1896429.05	LITTLE FERRY BORO	1866399.25
LITTLE SILVER BORO	2224950.91	LITTLE SILVER BORO	3204317.66
LIVINGSTON TWP	0	LIVINGSTON TWP	0
LODI BOROUGH	398549.96	LODI BOROUGH	59461.82
LOGAN TWP	831157.92	LOGAN TWP	849063.41
LONG BEACH ISLAND	941441.16	LONG BEACH ISLAND	896953.01

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
LONG BRANCH CITY	22547929.28	LONG BRANCH CITY	22704660.92
LONGPORT	0	LONGPORT	0
LOPATCONG TWP	1187973.29	LOPATCONG TWP	1293704.09
LOWER ALLOWAYS CREEK	306454.62	LOWER ALLOWAYS CREEK	307691.72
LOWER CAPE MAY REGIONAL	2996199	LOWER CAPE MAY REGIONAL	2972206
LOWER TWP	3756426	LOWER TWP	4361772
LUMBERTON TWP	2808559	LUMBERTON TWP	2823974.83
LYNDHURST TWP	3490645.22	LYNDHURST TWP	3344967.64
MADISON BORO	6906077.85	MADISON BORO	5570021.52
MAGNOLIA BORO	960115.87	MAGNOLIA BORO	920438.48
MAHWAH TWP	7106802	MAHWAH TWP	7070681
MAINLAND REGIONAL	2594230.14	MAINLAND REGIONAL	3806617.78
MANALAPAN-ENGLISHTOWN REG	13383317.64	MANALAPAN-ENGLISHTOWN REG	12414543.21
MANASQUAN BORO	3490407.06	MANASQUAN BORO	3933932.56
MANCHESTER TWP	9381635.52	MANCHESTER TWP	8821432.59
MANNINGTON TWP	0	MANNINGTON TWP	0
MANSFIELD TWP	3278210	MANSFIELD TWP	3451458.41
MANTUA TWP	2871453.41	MANTUA TWP	3207955.32
MANVILLE BORO	2986739.38	MANVILLE BORO	3185158.44
MAPLE SHADE TWP	5378534	MAPLE SHADE TWP	5389723
MARGATE CITY	723551.79	MARGATE CITY	719212.66
MARLBORO TWP	11940040.29	MARLBORO TWP	11435781.96
MATAWAN-ABERDEEN REGIONAL	10988826.62	MATAWAN-ABERDEEN REGIONAL	11351351.98
MAURICE RIVER TWP	1065017.54	MAURICE RIVER TWP	1012707.57
MAYWOOD BORO	1875576.55	MAYWOOD BORO	1761895.14
MEDFORD LAKES BORO	897222	MEDFORD LAKES BORO	934851
MEDFORD TWP	6383733.62	MEDFORD TWP	6279811.18
MENDHAM BORO	1230189.75	MENDHAM BORO	1273089.3
MENDHAM TWP	0	MENDHAM TWP	0
Mercer County Special Services School District	8210319.77	Mercer County Special Services School District	7501454.1
MERCER COUNTY VOCATIONAL	1435312.71	MERCER COUNTY VOCATIONAL	1446141.64

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
MERCHANTVILLE BORO	651823.48	MERCHANTVILLE BORO	671172.51
METUCHEN BORO	0	METUCHEN BORO	0
MIDDLE TWP	5906160.56	MIDDLE TWP	5511568.52
MIDDLESEX BORO	5079153.64	MIDDLESEX BORO	5079779.72
Educational Services Commission of New Jersey	10747570.52	Educational Services Commission of New Jersey	10356580.83
MIDDLESEX CO VOCATIONAL	6105848.81	MIDDLESEX CO VOCATIONAL	5753280.73
MIDDLETOWN TWP	17763423.32	MIDDLETOWN TWP	19393310.96
MIDLAND PARK BORO	3978910.45	MIDLAND PARK BORO	1694251.81
MILFORD BORO	211425.3	MILFORD BORO	168449.33
MILLBURN TWP	10528180.02	MILLBURN TWP	10235987.93
MILLSTONE TWP	4080138.15	MILLSTONE TWP	3524954.81
MILLTOWN BORO	1223799.69	MILLTOWN BORO	1490208.28
MILLVILLE CITY	14851665.82	MILLVILLE CITY	14239400.19
MINE HILL TWP	742866	MINE HILL TWP	739551
MONMOUTH BEACH BORO	623294	MONMOUTH BEACH BORO	596789.6
MONMOUTH-OCEAN ED SER COM	3345116.58	MONMOUTH-OCEAN ED SER COM	2246165.49
MONMOUTH CO VOCATIONAL	8203562.41	MONMOUTH CO VOCATIONAL	6956080.83
MONMOUTH REGIONAL	363135.11	MONMOUTH REGIONAL	365527.09
MONROE TWP	0	MONROE TWP	0
MONTAGUE TWP	809092.5	MONTAGUE TWP	768258.47
MONTCLAIR TOWN	0	MONTCLAIR TOWN	0
MONTGOMERY TWP	13708588.62	MONTGOMERY TWP	13293792.1
MONTVALE BORO	2371490	MONTVALE BORO	2178992
MONTVILLE TWP	8226885.29	MONTVILLE TWP	8341905.22
MOONACHIE BORO	724119.67	MOONACHIE BORO	690383.8
MOORESTOWN TWP	0	MOORESTOWN TWP	0
EDUC SERV COMM MORRIS CO	0	EDUC SERV COMM MORRIS CO	0
MORRIS COUNTY VOCATIONAL	1848748.51	MORRIS COUNTY VOCATIONAL	1852730.24
MORRIS HILLS REGIONAL	7847422.77	MORRIS HILLS REGIONAL	8313288.53
MORRIS PLAINS BORO	1461283.71	MORRIS PLAINS BORO	1393744.01
MORRIS SCHOOL DISTRICT	13251156.12	MORRIS SCHOOL DISTRICT	13339080.24

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
MORRIS-UNION JOINTURE COM	3669555.05	MORRIS-UNION JOINTURE COM	3819299.69
MOUNT ARLINGTON BORO	778990.94	MOUNT ARLINGTON BORO	756630.68
MOUNT EPHRAIM BORO	969840.08	MOUNT EPHRAIM BORO	989331.54
MOUNT HOLLY TWP	2451569.94	MOUNT HOLLY TWP	2463519.78
MOUNT LAUREL TWP	9136767.56	MOUNT LAUREL TWP	9240621.52
MOUNT OLIVE TWP	0	MOUNT OLIVE TWP	0
MOUNTAIN LAKES BORO	4175654.2	MOUNTAIN LAKES BORO	4159374.16
MOUNTAINSIDE BORO	1904517.08	MOUNTAINSIDE BORO	1943226.32
MULLICA TWP	156307.33	MULLICA TWP	152951.46
NATIONAL PARK BORO	0	NATIONAL PARK BORO	0
NEPTUNE CITY	721638.08	NEPTUNE CITY	675722.04
NEPTUNE TWP	12008647.18	NEPTUNE TWP	11757802.46
NETCONG BORO	1012043.38	NETCONG BORO	1084054.09
NEW BRUNSWICK CITY	20699368.63	NEW BRUNSWICK CITY	25026398.45
NEW HANOVER TWP	622199.66	NEW HANOVER TWP	0
NEW MILFORD BORO	5630409.37	NEW MILFORD BORO	5413459.53
NEW PROVIDENCE BORO	0	NEW PROVIDENCE BORO	0
NEWARK CITY	91393323.91	NEWARK CITY	90819293.74
NEWFIELD BORO	0	NEWFIELD BORO	0
NEWTON TOWN	0	NEWTON TOWN	0
NORTH ARLINGTON BORO	2073534.84	NORTH ARLINGTON BORO	2406796.41
NORTH BERGEN TWP	16886056.49	NORTH BERGEN TWP	15741745.56
NORTH BRUNSWICK TWP	14181322.36	NORTH BRUNSWICK TWP	16020309.27
NORTH CALDWELL BORO	1959011.19	NORTH CALDWELL BORO	2039610.69
NORTH HALEDON BORO	1256396	NORTH HALEDON BORO	1338784.08
NORTH HANOVER TWP	3557297.68	NORTH HANOVER TWP	3414818.03
N HUNT/VOORHEES REGIONAL	5722184.24	N HUNT/VOORHEES REGIONAL	6168389.6
NORTH PLAINFIELD BORO	0	NORTH PLAINFIELD BORO	0
NORTH WARREN REGIONAL	1453787.14	NORTH WARREN REGIONAL	1576066.56
NORTH WILDWOOD CITY	1069814.04	NORTH WILDWOOD CITY	978763.6
NORTHERN BURLINGTON REG	5182859.69	NORTHERN BURLINGTON REG	5704696.92

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
NORTHERN HIGHLANDS REG	2829755.33	NORTHERN HIGHLANDS REG	2782265.18
NORTHERN VALLEY REGIONAL	8297167.77	NORTHERN VALLEY REGIONAL	8035790.92
NORTHFIELD CITY	2008453.55	NORTHFIELD CITY	2123627.75
NORTHVALE BORO	921389	NORTHVALE BORO	1097829
NORWOOD BORO	1216036.9	NORWOOD BORO	1181169.35
NUTLEY TOWN	11016407	NUTLEY TOWN	12790081
OAKLAND BORO	4799925.71	OAKLAND BORO	4406734.99
OAKLYN BORO	628034.5	OAKLYN BORO	639904.27
OCEAN CITY	5251677	OCEAN CITY	5008414
OCEAN COUNTY VOCATIONAL	2888284.76	OCEAN COUNTY VOCATIONAL	2987857.36
OCEAN GATE BORO	350040.12	OCEAN GATE BORO	344542.2
OCEAN TWP	39461930.95	OCEAN TWP	12340946.92
OCEANPORT BORO	1852930.41	OCEANPORT BORO	1572232.92
OGDENSBURG BORO	690814.19	OGDENSBURG BORO	671039.55
OLD BRIDGE TWP	22379410.26	OLD BRIDGE TWP	21432149.4
OLD TAPPAN BORO	1339630.11	OLD TAPPAN BORO	1450797.21
OLDMANS TWP	559756.29	OLDMANS TWP	545515.28
ORADELL BORO	144962.86	ORADELL BORO	105395.16
CITY OF ORANGE TWP	0	CITY OF ORANGE TWP	0
OXFORD TWP	625013	OXFORD TWP	711285.02
PALISADES PARK	3991665.37	PALISADES PARK	3618727.59
PALMYRA BORO	2581187.6	PALMYRA BORO	2518497.74
PARAMUS BORO	9538940.02	PARAMUS BORO	9028718.55
PARK RIDGE BORO	3911116.97	PARK RIDGE BORO	3694188.71
PARSIPPANY-TROY HILLS TWP	18307325.16	PARSIPPANY-TROY HILLS TWP	18416246.54
PASCACK VALLEY REGIONAL	5147572.33	PASCACK VALLEY REGIONAL	4900101.76
PASSAIC CITY	0	PASSAIC CITY	0
Northern Region Educational Services Commission	0	Northern Region Educational Services Commission	0
PASSAIC CO MANCHESTER REG	1636605	PASSAIC CO MANCHESTER REG	1597416.8
PASSAIC VALLEY REGIONAL	2919107.2	PASSAIC VALLEY REGIONAL	2536104.92
PASSAIC COUNTY VOCATIONAL	10589002.39	PASSAIC COUNTY VOCATIONAL	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
LONG HILL TWP	1899067.53	LONG HILL TWP	1942417.98
PATERSON CITY	74581861.66	PATERSON CITY	76420984.4
PAULSBORO BORO	3181895.62	PAULSBORO BORO	3104274.04
PEMBERTON BOROUGH	0	PEMBERTON BOROUGH	0
PEMBERTON TWP	0	PEMBERTON TWP	0
PENNSAUKEN TWP	14885986.76	PENNSAUKEN TWP	15271057.28
PENNS GRV-CARNEYS PT REG	4701008.31	PENNS GRV-CARNEYS PT REG	4474820.97
PENNSVILLE	0	PENNSVILLE	0
PEQUANNOCK TWP	5613400.44	PEQUANNOCK TWP	5095753.06
PERTH AMBOY CITY	31553738.14	PERTH AMBOY CITY	33150758.47
PHILLIPSBURG TOWN	10579638.3	PHILLIPSBURG TOWN	11631120.16
PINELANDS REGIONAL	0	PINELANDS REGIONAL	0
PINE HILL BORO	4391870.23	PINE HILL BORO	4635553.39
PINE VALLEY	0	PINE VALLEY	0
PISCATAWAY TWP	12653326.53	PISCATAWAY TWP	12926253.96
PITMAN BORO	3063661.49	PITMAN BORO	2790146.77
PITTSGROVE TWP	3828333.54	PITTSGROVE TWP	4003375.72
PLAINFIELD CITY	0	PLAINFIELD CITY	0
PLEASANTVILLE CITY	0	PLEASANTVILLE CITY	0
PLUMSTED TWP	2585825.3	PLUMSTED TWP	2802893.59
POHATCONG TWP	835795	POHATCONG TWP	879996
POINT PLEASANT BORO	6355880.59	POINT PLEASANT BORO	6197963.84
POINT PLEASANT BEACH BORO	2048482	POINT PLEASANT BEACH BORO	1965140
POMPTON LAKES BORO	2832421.32	POMPTON LAKES BORO	2360478.78
PORT REPUBLIC CITY	0	PORT REPUBLIC CITY	0
PRINCETON PUBLIC SCHOOLS	12486507.24	PRINCETON PUBLIC SCHOOLS	11635085.29
PROSPECT PARK BORO	46037301.08	PROSPECT PARK BORO	28140889.97
QUINTON TWP	0	QUINTON TWP	0
RAHWAY CITY	10182995.53	RAHWAY CITY	7986357.03
RAMAPO-INDIAN HILL REG	5323815.98	RAMAPO-INDIAN HILL REG	5177459.46
RAMSEY BORO	6986501	RAMSEY BORO	6576827.49

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
RANCOCAS VALLEY REGIONAL	3540066.36	RANCOCAS VALLEY REGIONAL	3274089.97
RANDOLPH TWP	0	RANDOLPH TWP	0
Readington Twp	3929220.59	Readington Twp	4003459.36
RED BANK BORO	4789313.72	RED BANK BORO	4424455.29
RED BANK REGIONAL	3146225.46	RED BANK REGIONAL	3446139.84
RIDGEFIELD BORO	5083842.04	RIDGEFIELD BORO	4856292.23
RIDGEFIELD PARK TWP	4918355.54	RIDGEFIELD PARK TWP	3580267.18
RIDGEWOOD VILLAGE	10628097.21	RIDGEWOOD VILLAGE	10901160.62
RINGWOOD BORO	2888434.56	RINGWOOD BORO	2877625
RIVER DELL REGIONAL	3631705.32	RIVER DELL REGIONAL	3578707.99
RIVER EDGE BORO	2940373.12	RIVER EDGE BORO	2858379.94
RIVER VALE TWP	2470450.11	RIVER VALE TWP	2413223.1
RIVERDALE BORO	834881.42	RIVERDALE BORO	791328.04
RIVERSIDE TWP	3286023.89	RIVERSIDE TWP	3353780.54
RIVERTON	516984.48	RIVERTON	515915.93
ROCHELLE PARK TWP	1043077.4	ROCHELLE PARK TWP	1080015.53
ROCKAWAY BORO	1126666.12	ROCKAWAY BORO	1195455.43
ROCKAWAY TWP	7427803	ROCKAWAY TWP	7575911
ROCKLEIGH	0	ROCKLEIGH	0
ROOSEVELT BORO	234889.98	ROOSEVELT BORO	140259.78
ROSELAND BORO	1199424.3	ROSELAND BORO	1295836
ROSELLE BORO	7454168.53	ROSELLE BORO	9974428.11
ROSELLE PARK BORO	4283392.73	ROSELLE PARK BORO	5086964.18
ROXBURY TWP	7279244.94	ROXBURY TWP	8057974.05
RUMSON BORO	2455700.24	RUMSON BORO	2227976.6
RUMSON-FAIR HAVEN REG	1843323.35	RUMSON-FAIR HAVEN REG	0
RUNNEMEDE BORO	2418402.76	RUNNEMEDE BORO	2600347.69
RUTHERFORD BORO	5455388.9	RUTHERFORD BORO	5300765.47
SADDLE BROOK TWP	3788806	SADDLE BROOK TWP	3703336
SADDLE RIVER BORO	512182.35	SADDLE RIVER BORO	562455.08
SALEM CITY	0	SALEM CITY	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
SALEM CO SPECIAL SERVICE	0	SALEM CO SPECIAL SERVICE	0
SALEM COUNTY VOCATIONAL	0	SALEM COUNTY VOCATIONAL	0
SANDYSTON-WALPACK TWP	330744.12	SANDYSTON-WALPACK TWP	338517.24
SAYREVILLE BORO	11776010.73	SAYREVILLE BORO	12891877.32
SCOTCH PLAINS-FANWOOD REG	16017838.69	SCOTCH PLAINS-FANWOOD REG	15790333.98
SEA GIRT BORO	346844.89	SEA GIRT BORO	366383.34
SEA ISLE CITY	0	SEA ISLE CITY	0
SEASIDE HEIGHTS BORO	718200.96	SEASIDE HEIGHTS BORO	690008.25
SEASIDE PARK BORO	0	SEASIDE PARK BORO	0
SECAUCUS TOWN	4284100.49	SECAUCUS TOWN	3708252.04
SHAMONG TWP	1807676.66	SHAMONG TWP	1747293.37
SHILOH BORO	0	SHILOH BORO	0
SHORE REGIONAL	1805392.34	SHORE REGIONAL	2014269.96
SHREWSBURY BORO	0	SHREWSBURY BORO	0
SOMERDALE BORO	0	SOMERDALE BORO	0
SOMERS POINT CITY	1716792.28	SOMERS POINT CITY	735043.16
SOMERSET CO ED SERV COMM	0	SOMERSET CO ED SERV COMM	0
SOMERSET CO VOCATIONAL	1754072.69	SOMERSET CO VOCATIONAL	1829283.29
SOMERSET HILLS REGIONAL	4376700.7	SOMERSET HILLS REGIONAL	4335739.28
SOMERVILLE BORO	4701725.9	SOMERVILLE BORO	4556324.97
SOUTH AMBOY CITY	1824240.56	SOUTH AMBOY CITY	1549519.56
LAKE COMO	0	LAKE COMO	0
SOUTH BERGEN JOINTURE COM	4300372.32	SOUTH BERGEN JOINTURE COM	4320728
SOUTH BOUND BROOK	921908.44	SOUTH BOUND BROOK	934932
SOUTH BRUNSWICK TWP	20043050.1	SOUTH BRUNSWICK TWP	20482203.28
SOUTH HACKENSACK TWP	692279.92	SOUTH HACKENSACK TWP	660554.65
SOUTH HARRISON TWP	628168.8	SOUTH HARRISON TWP	521476
SOUTH ORANGE-MAPLEWOOD	12064897.12	SOUTH ORANGE-MAPLEWOOD	12199061.2
SOUTH PLAINFIELD BORO	8157736.48	SOUTH PLAINFIELD BORO	8377903.83
SOUTH RIVER BORO	4023287	SOUTH RIVER BORO	4493654
Southampton Township School District	0	Southampton Township School District	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
DELSEA REGIONAL H.S DIST.	4688757.48	DELSEA REGIONAL H.S DIST.	4765067.22
SOUTHERN REGIONAL	8134732.69	SOUTHERN REGIONAL	8217058.32
SPARTA TWP	0	SPARTA TWP	0
SPOTSWOOD BORO	3483208.36	SPOTSWOOD BORO	3958200.5
SPRING LAKE BORO	330888.07	SPRING LAKE BORO	288899.16
SPRING LAKE HEIGHTS BORO	791862.42	SPRING LAKE HEIGHTS BORO	792510.88
SPRINGFIELD TWP	5543999.8	SPRINGFIELD TWP	5411995.76
STAFFORD TWP	4868560.88	STAFFORD TWP	4660811.68
STANHOPE BORO	707130.76	STANHOPE BORO	723711.47
STERLING HIGH SCHOOL DIST	157350.95	STERLING HIGH SCHOOL DIST	140427.95
STILLWATER TWP	957760.36	STILLWATER TWP	998528.13
STONE HARBOR BORO	340400.91	STONE HARBOR BORO	312651.28
STOW CREEK TWP	416201.32	STOW CREEK TWP	399405.7
STRATFORD BORO	176827.42	STRATFORD BORO	168902.02
SUMMIT CITY	8258485.12	SUMMIT CITY	9692251.71
SUSSEX-WANTAGE REGIONAL	0	SUSSEX-WANTAGE REGIONAL	0
SUSSEX CO ED SERV COMM	424758	SUSSEX CO ED SERV COMM	467134
SUSSEX COUNTY VOCATIONAL	1864812.58	SUSSEX COUNTY VOCATIONAL	1862823.64
SWEDESBORO-WOOLWICH	3940519.97	SWEDESBORO-WOOLWICH	3961811.55
TABERNACLE TWP	1958739.91	TABERNACLE TWP	2119661.18
TAVISTOCK	0	TAVISTOCK	0
TEANECK TWP	7699106.09	TEANECK TWP	7843941.07
TENAFly BORO	8395057.94	TENAFly BORO	8238671.26
TETERBORO	0	TETERBORO	0
TEWKSBURY TWP	2059604.36	TEWKSBURY TWP	2308479.49
TINTON FALLS	4289638.41	TINTON FALLS	4030680.92
TOMS RIVER REGIONAL	39062503.96	TOMS RIVER REGIONAL	37361886.8
TOTOWA BORO	2196167.81	TOTOWA BORO	2143880.73
TRENTON PUBLIC SCHOOL DISTRICT	0	TRENTON PUBLIC SCHOOL DISTRICT	0
TUCKERTON BORO	0	TUCKERTON BORO	0
UNION BEACH	0	UNION BEACH	0

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
UNION CITY	0	UNION CITY	0
UNION CO ED SERV COMM	3739649.98	UNION CO ED SERV COMM	4213078.16
UNION COUNTY VOCATIONAL	0	UNION COUNTY VOCATIONAL	0
UNION TWP	1188541.35	UNION TWP	1294422.16
UPPER DEERFIELD TWP	2154974.47	UPPER DEERFIELD TWP	2162442.23
UPPER FREEHOLD REGIONAL	5558687.01	UPPER FREEHOLD REGIONAL	5179668.3
UPPER PITTSBORO TWP	770756.91	UPPER PITTSBORO TWP	862634
UPPER SADDLE RIVER BORO	3794083.14	UPPER SADDLE RIVER BORO	3801860.37
UPPER TWP	2553496.09	UPPER TWP	2985800.58
VENTNOR CITY	1895295	VENTNOR CITY	2006011
VERNON TWP	6548449	VERNON TWP	6570787
VERONA BORO	3076117.88	VERONA BORO	3290923.32
VINELAND CITY	2112417.36	VINELAND CITY	2224906.47
VOORHEES TWP	7413208.88	VOORHEES TWP	9750194.12
WALDWICK BORO	4482107.29	WALDWICK BORO	3988186.16
WALL TWP	9513411	WALL TWP	10011327.48
WALLINGTON BORO	1554623.16	WALLINGTON BORO	1907024.44
WALLKILL VALLEY REGIONAL	0	WALLKILL VALLEY REGIONAL	0
WANAQUE BORO	1948919.84	WANAQUE BORO	2085950.98
WARREN CO SPECIAL SERVICE	147570.16	WARREN CO SPECIAL SERVICE	151642.8
WARREN COUNTY VOCATIONAL	1329104.59	WARREN COUNTY VOCATIONAL	1102080.55
WARREN HILLS REGIONAL	4191030.73	WARREN HILLS REGIONAL	4512869.03
WARREN TWP	6323586.45	WARREN TWP	6117225.08
WASHINGTON BORO	1342371	WASHINGTON BORO	1285027
WASHINGTON TWP	24722601.21	WASHINGTON TWP	25444027.74
ROBBINSVILLE	5514407.99	ROBBINSVILLE	5147569.67
WATCHUNG BORO	1734203.29	WATCHUNG BORO	1934636.35
WATCHUNG HILLS REGIONAL	4593529	WATCHUNG HILLS REGIONAL	4311237
WATERFORD TWP	2011480	WATERFORD TWP	2051783
WAYNE TWP	23983631	WAYNE TWP	21303516.28
WEEHAWKEN TWP	3566938.72	WEEHAWKEN TWP	3327259.56

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
WENONAH BORO	295129.53	WENONAH BORO	308207.26
WEST CAPE MAY BORO	0	WEST CAPE MAY BORO	0
WEST DEPTFORD TWP	6082815.13	WEST DEPTFORD TWP	7680430.27
WEST ESSEX REGIONAL	0	WEST ESSEX REGIONAL	0
WEST LONG BRANCH BORO	917120	WEST LONG BRANCH BORO	886454
LOCH ARBOUR SCHOOL DISTRICT	0	LOCH ARBOUR SCHOOL DISTRICT	0
WEST MILFORD TWP	9501495.93	WEST MILFORD TWP	10347024.36
WEST MORRIS REGIONAL	4856014.41	WEST MORRIS REGIONAL	5415984.72
WEST NEW YORK TOWN	18796390.59	WEST NEW YORK TOWN	18352460.89
WEST ORANGE TOWN	16986723.15	WEST ORANGE TOWN	17445074.58
WOODLAND PARK	2329362.18	WOODLAND PARK	2357665.32
WEST WILDWOOD	0	WEST WILDWOOD	0
W WINDSOR-PLAINSBORO REG	0	W WINDSOR-PLAINSBORO REG	0
WESTAMPTON	1655045.64	WESTAMPTON	1667325.47
WESTFIELD TOWN	17414400.61	WESTFIELD TOWN	17781382.14
WESTVILLE BORO	113987.28	WESTVILLE BORO	0
WESTWOOD REGIONAL	7235320.46	WESTWOOD REGIONAL	7293343.15
WEYMOUTH TWP	556925.31	WEYMOUTH TWP	487803.38
WHARTON BORO	1660172.39	WHARTON BORO	1857994.9
WHITE TWP	863795.52	WHITE TWP	927439.28
WILDWOOD CITY	2564706.81	WILDWOOD CITY	2352878.11
WILDWOOD CREST BORO	0	WILDWOOD CREST BORO	0
WILLINGBORO TWP	0	WILLINGBORO TWP	0
WINFIELD TWP	400072.9	WINFIELD TWP	352560.92
WINSLOW TWP	10317967.58	WINSLOW TWP	10162448.09
WOOD-RIDGE BORO	2511094.74	WOOD-RIDGE BORO	2448947.66
WOODBINE BORO	642758.09	WOODBINE BORO	688389.89
WOODBURGE TWP	0	WOODBURGE TWP	0
WOODBURY CITY	3302837.42	WOODBURY CITY	3518256.71
WOODBURY HEIGHTS BORO	320481.72	WOODBURY HEIGHTS BORO	456466.23
WOODCLIFF LAKE BORO	1897998.64	WOODCLIFF LAKE BORO	1849528.5

Plan Coverage Actual		Plan Coverage Projected	
District	Total	District	Total
WOODLAND TWP	353484	WOODLAND TWP	350855.81
WOODLYNNE BORO	1086837.8	WOODLYNNE BORO	1072896.45
WOODSTOWN-PILES GROVE REG	2527843.22	WOODSTOWN-PILES GROVE REG	2768522.79
WYCKOFF TWP	4933197.82	WYCKOFF TWP	4163705.18

File No. 12160-87

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Attorneys for Complainants

**In re Complaint Filed by the
Franklin Township Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Gloucester City Board of Education
Regarding P.L. 2020, Chapter 44.**

**In re Complaint Filed by the
Lower Township Elementary Board of
Education Regarding P.L. 2020, Chapter
44.**

**STATE OF NEW JERSEY
COUNCIL ON LOCAL MANDATES**

**COLM-0001-21 CONSOLIDATED
ACTIONS**

CERTIFICATION OF SERVICE

I, Diane Curcio, of full age, hereby certify as follows:

I am employed by the law firm of Parker McCay P.A., attorneys for Complainants Gloucester City Board of Education, Franklin Township Board of Education, and Lower Township Elementary Board of Education. On October 12, 2021, the original and two copies of Complainants' Motion for Summary Judgment in the above captioned matter were sent via email and FedEx Overnight Mail to:

State of New Jersey
Council on Local Mandates
140 East Front Street, 8th Floor
Trenton, NJ 08625
filings-clmand@treas.state.nj.us

Via email and certified mail to:

The Honorable John A. Sweeney, J.S.C. (Ret.)
Chair, Council on Local Mandates
200 East Eighth Street
Florence, NJ 08518
jsweeneylaw@comcast.net

A copy of the within was also sent to the following via email:

Leon Sokol, Esquire
Attorney for Amicus Curiae,
Senate President Stephen M. Sweeney
and Assembly Speaker Craig J. Coughlin
LSokol@cullenllp.com

Jaclyn Frey, Deputy Attorney General
Attorney for Respondent,
Executive Branch of the State of New Jersey
Jaclyn.Frey@law.njoag.gov

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Diane Curcio
Diane Curcio

Date: October 12, 2021

4822-9974-3486, v. 1