

Educating New Jersey's Most Vulnerable Students with Disabilities

**The School Staff Shortage Crisis at
Approved Private Schools for Students with Disabilities**



**ASAH
January 31, 2023**



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Executive Summary

While the national and statewide shortage of school staff is affecting ALL students, there are unique challenges *and unique solutions* to better serve the 10,000 public school students with disabilities who are placed by sending districts in New Jersey's approved private schools for students with disabilities (APSSDs).

These schools are an important safety net for local public schools, who are responsible under state and federal law (<https://sites.ed.gov/idea/statute-chapter-33>) for delivering appropriate and individualized special education services to all students who are eligible.

Under federal law, the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, et., (found here: <https://sites.ed.gov/idea/statute-chapter-33>) private special education schools are part of the required "full continuum" of placement options that must be made available to students with disabilities. As such, APSSDs operate as **part of the public school system**. Students placed at APSSDs are public school students. They are placed by public school employees after it is determined that the public programs are not able to offer the range, scope, or intensity of services a child needs. Tuition is paid through public tax dollars.

Other states have true private schools, most of which operate like New Jersey's independent schools, but the concept of "private" schools for students with disabilities in New Jersey is somewhat misleading. APSSDs are heavily regulated and monitored by NJDOE for fiscal and program excellence. Tuition is set annually, not by the school itself, but by NJDOE. Tuition rates are based on a set of costs that NJDOE deems to be "allowable." Any cost that is not "allowable" cannot be counted toward tuition.

While APSSDs serve more than 10,000 of New Jersey's most complex public school students with disabilities, they face a unique set of rules and limitations that make it extremely difficult to operate. The following recommendations would ease hiring, recruiting, and retention challenges faced by APSSDs, allowing us to partner more effectively with local public schools in order to best serve students for whom they are responsible.

Recommended Policy Changes

Certification and Credentialing

It is time-intensive and costly for an educator to be certified to teach special education in New Jersey. NJDOE certification rules create a strong disincentive for educators to pursue special education. Teachers must be dually-certified for jobs that are harder and likely offer lower pay.

1. Allow APSSDs to participate in the limited CE/CEAS program.
2. Allow for the temporary use of long-term substitute teachers beyond 60 days.
3. Allow educators with special education teaching certification to demonstrate core knowledge in other content areas by taking Praxis, with no added coursework required.
4. Allow APSSDs to hire teachers for departmental classrooms at the secondary level according to NJAC 6A:14-4.7 (g) in the same ways that public programs are allowed.
5. Allow educators with a bachelor's degree who are enrolled in an approved teacher preparation program to get 2-year emergency teaching certificate.
6. Allow school professionals who are certified/credentialed in other states to practice in NJ.
7. Allow teachers to earn more than 6 transferrable credits at community colleges.
8. Expedite and streamline the fingerprinting process, and ensure better communication.

Compensation and Benefits

It is vital that APSSDs are able to offer attractive, competitive salaries, benefits and compensation packages if they are to compete in today's job market. APSSDs are at an added disadvantage in several areas including outdated salary caps, outdated and incomplete salary guide, benefits and bonuses.

1. NJDOE should complete a formal salary and benefits study, and make necessary changes to allow APSSDs to offer competitive compensation packages. ¹
2. NJDOE should update outdated salary "caps."
3. NJDOE should establish reasonable salary and rate guides for a broad range of specialists and outside contractors (e.g. psychiatrists, BCBAs, physicians, counselors.)
4. NJ leaders should enact A-2514 and make its provisions effective immediately.

(1)N.J.A.C. 6A:23A-18.3 (o)(3) requires NJDOE to initiate a study examining the maximum allowable salary structure. In conducting the study, the Department may seek and/or include input from an APSSD representative(s). The study includes a data-driven review of maximum salaries and recommendations, if any, for changes to the maximum allowable salary calculation formula contained. The study has not been completed.

Career Ladder, Professional Growth, and Leadership Development

Educators need accessible, affordable, and visible ways to advance in their careers. NJDOE's fiscal code for APSSDs, as it relates to professional development, is very limiting.

1. Expand allowable costs to include more spending for professional development.
2. Provide more generous stipends and/or tuition remission to new teachers in exchange for a commitment to teach complex special education students for a period of 3-5 years.
3. Provide state funding for tuition remission to support paraprofessionals as they pursue teaching credentials.

Teacher Preparation Programs

Most educators are not familiar with or exposed to APSSDs or the education of students with severe disabilities. They lack awareness about professional opportunities at APSSDs.

1. Teacher preparation programs should develop and promote tracks for educators to teach students with severe and profound disabilities.
2. Teacher preparation programs should be encouraged to place student teachers at APSSDs.
3. NJDOE should allow employment opportunities at APSSDs to be listed alongside those of local education agencies (LEAs) on the NJDOE website under Education Employment Opportunities.
4. State education stakeholder groups should engage leaders from APSSDs in mentorship roles with NJ Association of School Business Administrators, NJ Leader to Leader, and NJ Excel.

Staff Retention

Fiscal flexibility must allow APSSDs to engage in staff retention strategies, and have costs associated with such efforts included in allowable costs.

1. Increase the cap on payout for unused paid time off in order to remove the incentive to use the days.
2. Allow APSSDs to offer stipends based on years of service.
3. Increase caps on professional development costs to allow APSSDs to train and develop a crisis team that can step in when teachers need help in the classroom.

Educating New Jersey's Most Vulnerable Students with Disabilities

The School Staff Shortage Crisis at Approved Private Schools for Students with Disabilities

Background

There is a national crisis in education, with documented teacher shortages affecting every facet of K-12 education, public and private. Special education has been hit especially hard.

This winter, Governor Phil Murphy established and convened a Task Force on Public School Staff Shortages. The 23-member group was appointed by Executive Order [No. 309](#) to provide recommendations to address the challenges facing New Jersey's educational workforce, and develop short and long-term recommendations to increase the quantity of K-12 school staff – including teachers and support staff – in the state.

In spite of efforts on the part of ASAH to secure “a seat at the table” to contribute to the Governor's Task Force, the community of private special education schools were not offered that opportunity.

In New Jersey, there are nearly 10,000 *public school students* with severe and complex disabilities who are served in Approved Private Schools for Students with Disabilities (APSSDs). While the schools themselves may be private, the students are public school students, placed by local districts at no cost to parents when the local school is unable to provide the level of care and expertise, and the kind of specialized instruction a child needs.

ASAH, *Serving the Private Special Education Community Since 1974*, is a New Jersey membership association of more than 125 APSSDs. Founded in 1974, ASAH represents highly-specialized schools that educate our state's most complex and hard-to-serve public school students with autism, ADHD, Down syndrome, physical and medical disabilities, sensory disabilities, mental health challenges and psychiatric disabilities, and learning disabilities.

ASAH knows that the needs of New Jersey's most complex students with severe disabilities should not be overlooked. In December 2022, ASAH established *The President's Task Force on Staff Shortages*. Turning to the leadership of ASAH's member schools – many of whom are sought-after thought leaders in the industry – ASAH committed to study the issues, challenges, and solutions needed to address the staffing crisis. In issuing this report, ASAH seeks to ensure that the needs of the students educated at APSSDs, and the unique needs of our member schools, are heard and deemed worthy of addressing.

The goals of ASAH's *President's Task Force on Staff Shortages* are:

- identify the scope of the staffing challenges unique to APSSDs
- identify the impact of those shortages on operations and students
- identify key areas for reform
- generate specific recommendations for New Jersey

Process

ASAH's 19-member Task Force held four meetings, each with a central theme. To inform its work ASAH issued a member survey designed to define the scope of the challenge and identify recommendations (Appendix A). An ASAH school leader was invited to present research findings on factors that influence staff retention at APSSDs. To close the process, ASAH hosted a hybrid membership meeting with more than 75 school leaders to get additional input.

Committee Membership

ASAH's *President's Task Force on Staff Shortages* represents a broad range of private special education providers, serving a wide range of students with disabilities from autism to medical, behavioral, intellectual, learning and social/emotional and psychiatric challenges. Representatives on the Task Force serve students across the state and from every county.

Executive Director:

John J. Mulholland, Jr., Esq.

Chairperson:

Brian Detlefsen, The Forum School

Committee Members:

- Kenneth Alter, Deron School of New Jersey
- Patricia Carlesimo, LADACIN Network
- Mike Carpino, SEARCH Day Program
- Amalia Duarte, ECLC of NJ
- Glenn Famous, Rock Brook School
- Dr. Leah Farinola, REED Academy
- Anthony Gebbia, Montgomery Academy
- Mary Ellen Graham, Pineland Learning Center
- Dr. Danielle Taylor, Spectrum360
- Bruce Litinger, Felician School for Exceptional Children
- Christopher Lynch, Windsor Learning Center
- Michele McCloskey, Archbishop Damiano School
- Cheryl Mountain, CPC Behavioral Healthcare
- Regina Peter, Newmark Education
- Bernie Polatschek, Collier School
- Maura L. Roberts, Legacy Treatment Services
- Annmarie Scorzo, Shepard and Windsor Schools

PART I: THE SCOPE OF THE CHALLENGE

According to 2021 data from the US Department of Education, 49 states and the District of Columbia are reporting shortages of special educators.

As the percentage of students in need of special education services is growing, there are fewer professionals entering the field. *New Jersey's Teacher Pipeline: The Decline in Teacher Candidates Continues*, published by New Jersey Policy Perspective, cited data from the U.S. Department of Education that documents this decline. Seven years ago, almost five people completed teacher preparation programs for every 1,000 students in New Jersey. Today, only two people in 1,000 complete such a program. In addition, New Jersey's colleges and universities produce fewer teachers per 1,000 students than the rest of the nation.

We have the perfect storm. With a dual increase of teacher attrition and an increase in the number of students receiving special education services, there is a pressing need to address the shortage of special educators. The additional factor of pandemic-related learning loss, and the related mental health challenges have created a generation of students with needs greater than ever before. This is especially true for the youngest students with disabilities, who are entering schools having lost out on traditional early childhood learning experiences.

The challenge is magnified for New Jersey's APSSDs. These schools, each of which is approved and monitored by the New Jersey Department of Education (NJDOE), serve public school students who attend programs at the request of local public schools when the local program is not able to meet the needs of the child. Specialized schools partner with public schools to serve nearly 10,000 of New Jersey's most vulnerable and complex students with disabilities.

While APSSDs are regulated like public schools, they are often left out of more progressive policy initiatives. They are subject to a separate set of restrictive fiscal rules, putting APSSDs and the students they serve at a disadvantage. These rules, some of which will be presented later in this report, exacerbate the staff shortage challenges crisis.

The shortage of qualified professionals and paraprofessionals has dramatically affected APSSDs, nearly all of which are experiencing staff shortages in areas including:

- Paraprofessionals
- Bus drivers
- Custodial staff
- School nurses
- Related services professionals (e.g., OT, PT, Speech)
- Mental health professionals (e.g., Social Workers, Counselors, Psychologists, Psychiatrists)
- Departmental teachers at the secondary level
- Teacher of Students with Disabilities (TOSD)
- High level content teachers (Sciences, Math, Technology)
- Teachers for "specials" and electives (Language, Health, Physical Education)

ASAH member schools report five general trends:

1. There are many job openings, but few applicants.

71% of our school leaders identified “lack of applicants” as a significant challenge.

ASAH leaders are saying:

“We have job openings from bus aides to business offices staff but we have had no resumes. Some positions have been open for months with no one applying.”

“Five years ago, we got fifty responses for a single job opening. Now it’s crickets.”

2. The applicant pool is smaller and less experienced.

84% of ASAH school leaders identified “lack of qualified candidates” as a significant challenge.

ASAH leaders are saying:

“We need people with MORE experience, MORE talent and MORE training because our students are hard to serve. Most of applicants lack what we need.”

“We are seeing people who have been out of the work force for years with no relevant experience.”

3. There are high rates of turnover and terminations.

37% of school leaders identified “high rates of turnover and terminations” as a significant challenge.

ASAH leaders are saying:

“We hire people and on-board them, then they simply don’t show up for work.”

“New hires, if we get them, call out sick, or show up but don’t really work, prompting terminations.”

4. Candidates who apply for jobs at APSSDs may possess skills that make them a good match, but lack the formal credentials for the positions to which they have applied.

ASAH leaders are saying:

“Many teachers who hold the certification needed are inexperienced in working with severe, profound lower academic and highly behavioral students.”

5. There is a high degree of competition for qualified candidates.

ASAH leaders are saying:

“Our teachers get hired away from us by public schools. We are in a bidding war, and public schools can pay more.”

“There is so much competition. Job seekers can work from home or Starbucks for the same money.”

PART II: THE IMPACT ON STUDENTS AND OPERATIONS

The Impact on Students

ASAH schools are an important safety net for local public schools, who are responsible under state and federal law (<https://sites.ed.gov/idea/statute-chapter-33>) for delivering appropriate and individualized special education services to all students who are eligible.

These public schools, also lacking staff, are referring students in urgent need of services to ASAH schools at unprecedented rates. Without adequate staffing, however, APSSDs cannot accept them. As a result, ASAH school leaders report that local districts are placing these high-need students on waiting lists, and sending them home – often for months at a time – until APSSDs can hire and train staff. Additionally, often there are not enough staff at the public school to provide the required minimum of 10 hours a week of home-bound instruction, and many students are not getting related services.

By the time students reach a classroom in an APSSD, many have experienced significant regression.

Some ASAH schools have been forced to turn away students who need 1:1 support or specialized nursing care. Students with mental illness and challenging behaviors are being sent home from public school pending psychiatric clearance. Public schools are turning to hospital care and intensive outpatient care for stop-gap therapeutic interventions for high risk students. Some students with disabilities end up in local hospitals in the Emergency Room when facing a mental health crisis.

The impact on students is overwhelmingly negative. Students experience:

- Delays in services and long wait times for placement
- Regression
- Inconsistency in academic programming and support staff
- Lack of nursing and related services
- Less opportunity for community-based learning and work based learning
- Cuts in certain programs, the arts, technology, industrial arts, and specials
- Diminished program effectiveness
- Increases in safety concerns
- Less technology in the classroom
- Families suffering from burnout and stress turn to the school for added assistance

ASAH leaders are saying:

“I never saw such demand for our services in my lifetime – but we don’t have the capacity to service them – they have been home and now they need us. But we cannot hire staff.”

“It can take months for high-need students to start school. Many are waiting at home.”

“Students who need nursing often cannot start school unless they find a nurse.”

The Impact on Operations

On a day-to-day basis, ASAH school leaders wear a variety of hats. They are facing a human resource crisis of unprecedented scale, and often juggle staff to meet requirements for maximum class size, student teacher ratios, and to fulfill a student's IEP. Credentialed school staff often have to step in, providing coverage for a myriad of roles including but not limited to instructional positions, cafeteria aides, bus monitors, janitorial services, and more. The vast majority of schools report that administrative staff have had to fill in to cover staff illness.

Such shortages have led to:

- Pervasive staff fatigue and burn out
- Diminished staff morale
- Negative impact on school climate and culture
- Stressed HR staff
- Rising cost and time of recruitment for on-boarding and training
- Additional exposure to legal liability
- Turning to staffing agencies in order to subcontract staff, driving up costs

ASAH leaders are saying:

“We need to increase salaries for paraprofessionals, but it will drive up our tuition.”

“Our teachers are losing prep time.”

PART III: UNIQUE CHALLENGES AT APSSDs and RECOMMENDATIONS for POLICY CHANGES

Under federal law, the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, et., (found here: <https://sites.ed.gov/idea/statute-chapter-33>) private special education schools are part of the required “full continuum” of placement options that must be made available to students with disabilities. As such, *APSSDs operate as part of the public school system*. Students placed at APSSDs are public school students. They are placed by public school employees after it is determined that the public programs are not able to offer the range, scope, or intensity of services a child needs. Tuition is paid through public tax dollars.

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While APSSDs serve more than 10,000 of New Jersey’s most complex public school students with disabilities, they face a unique set of rules and limitations that make it extremely difficult to operate.

The following recommendations would ease hiring, recruiting, and retention challenges faced by APSSDs, allowing us to partner more effectively with local public schools in order to best serve students for whom they are responsible.

I. Certification and Credentialing

It is difficult, time-intensive, and costly for an educator to be certified to teach special education in New Jersey, particularly at the departmental (HS) level. NJDOE certification rules create a strong disincentive for educators to pursue special education. Teachers must be dually-certified for jobs that are harder and likely offer lower pay.

APSSDs are at an added disadvantage in several areas:

1. Limited Instructional Certificate of Eligibility (CE)/Certificate of Eligibility with Advanced Standing (CEAS) Program

A new limited teacher certification program allows NJDOE approved public school districts to hire teachers on a provisional basis who are otherwise qualified. In spite of efforts to be included in that initiative, APSSDs were left out. Educators at ASAH member schools have completed the

requirements set forth in the CE/CEAS pilot program, but because APSSDs are not included, APSSDs will be losing long-term educators who are leaving to work at public programs where limited CE/CEAS certification is allowed. Chapter 224, which amended and supplemented chapter 26 of Title 18A, found here: https://pub.njleg.state.nj.us/Bills/2020/PL21/224_.PDF

“I am extremely upset by the DOE’s refusal to allow us to participate in the Limited CE and CEAS program, when our needs are at LEAST equal to those of the Public School, and very possibly more significant, in that we require more highly trained teachers (with specific TOSD endorsement). We are called upon to adhere to the same certification requirements as the public schools, yet we are at a disadvantage by virtue of being denied this option.”

- An ASAH School Leader

2. Substitute Teachers

NJDOE rules allow schools to use long-term substitute teachers, with county approval, for up to a maximum of 60 instructional days. After that time, the substitute can no longer be used in that classroom and in some cases, must then be replaced by a different substitute.

“The restrictions on the assignment and use of substitute teachers is extremely problematic. In the absence of teachers, when we find qualified substitutes, we are restricted in the number of days for which they can teach student groups. This results in a terrible disruption of the instructional process.

That ONE change, or relaxing that limitation would help tremendously.”

- An ASAH School Leader

3. Dual Certifications

There are, quite literally, a second set of rules for APSSDs that make it harder to hire qualified teachers at the departmental level. NJAC 6A:14-4.7 defines requirements for special education classrooms. Section (g) specifically allows instruction to be provided in a secondary setting of a class organized around a single content area consisting solely of students with disabilities instructed by *a general education teacher* where an adapted general education curriculum is used. There is no requirement for a special education teacher to be present, nor is that teacher required to hold special education certifications. This language can be found here: <https://www.state.nj.us/education/code/current/title6a/chap14.pdf>

NJDOE has *disallowed* such a practice in APSSDs. Departmental classes at APSSDs must be taught by a teacher with two certifications (special education and subject matter). There are very few such professionals, making it nearly impossible – and very costly – to staff classrooms.

“Most teachers with dual certification in the sciences and math are just not interested in teaching our students because they have more limited academic abilities.”

- An ASAH School Leader

4. Fingerprinting

New Jersey's requirement for a criminal background check for new hires helps ensure that staff do not have a history of unlawful behavior. Unfortunately, the fingerprinting process can be lengthy, especially when a candidate has recently moved. The process can delay hiring by several weeks, even if a candidate has already been fingerprinted at another location. At times, criminal history clearance is also delayed due to incorrect payment or incomplete applications, but it is not communicated to the applicant.

Recommended Policy Changes

1. Allow APSSDs to participate in the limited CE/CEAS program. (<https://www.njleg.state.nj.us/bill-search/2022/S1553>)
2. Allow for the temporary use of long-term substitute teachers beyond 60 days.
3. Allow educators with special education teaching certification to demonstrate core knowledge in other content areas by taking Praxis, with no added coursework required.
4. Allow APSSDs to hire teachers for departmental classrooms at the secondary level according to NJAC 6A:14-4.7(g) in the same ways that public programs are allowed.
5. Allow educators with a bachelor's degree who are enrolled in an approved teacher preparation program to get a two-year emergency teaching certificate.
6. Allow school professionals who are certified/credentialed in other states to practice in NJ.
7. Allow teachers to earn more than six transferrable credits at community colleges.
8. Expedite and streamline the fingerprinting process, and ensure better communication.

II. Compensation and Benefits

It is vital that APSSDs are able to offer attractive, competitive salaries, benefits and compensation packages if they are to compete in today's job market. With fewer educators and a growing number of special education students, competition for quality credentialed staff is great. APSSDs are at an added disadvantage in several areas:

1. Outdated Maximum Salary Caps

Maximum salaries set by NJDOE for many job titles at APSSDs have been frozen since 2009-2010 school year. This means that a maximum salary of \$75,000 set in 2011, and only adjusted for inflation, should be set today at \$105,425, according to a CPI Inflation Calculator at the US Bureau of Labor Statistics. Other positions, including supervisor, has been frozen since 2014.

This NJDOE rule creates a disincentive for job seekers, knowing that their earning potential is capped at outdated levels. Only Speech/Occupational Therapist/Physical Therapist receive annual CPI increases.

“Even when we try to use an [employment] agency, the cost is outside the allowable cost – public schools can hire them, but the regs prevent us from hiring these staff.”

- An ASAH School Leader

2. Annual Salary Caps for 12-Month Staff at APSSDs are Based on 10-Month Positions in Public Schools

Many students at APSSDs need instruction year round to prevent regression, so APSSDs generally operate on a 12-month employment contracts. Public school programs generally offer 10-month contracts. The NJDOE’s salary guide and caps for maximum salaries for APSSDs is aligned with public school guides, which require staff to work fewer months each year. In short – they must work two additional months to get the same maximum salary.

The cap, as it is currently structured and implemented by NJDOE’s Office of Fiscal Accountability and Compliance (OFAC), is fundamentally flawed and inequitable.

To illustrate: A public school teacher in Burlington County earning the maximum annual salary makes \$126,117 for a 10-month contract. That same teacher working at an APSSD in Burlington County would have to work 12 months to earn the same salary.

But what if that APSSD teacher works 10 months, like their public school colleague? Here, NJDOE’s Office of Fiscal Accountability and Compliance (OFAC) uses a formula to prorate the private school teacher’s salary over 1820 hours to determine an hourly wage, then multiplies that wage by the number of hours the employee is contracted for.

To illustrate: An APSSD teacher in Burlington County who is working a 10-month contract (7 hours a day for 185 days) could earn a maximum of \$89,737. That is \$36,380 less than their public school counterpart. A link to the salary guide can be found here: https://www.state.nj.us/education/finance/fp/psd/2324/2023-2024_MaxSalary.pdf

3. Benefits and Bonuses

Leaders in the area of staff recruiting have recommended that ASAH schools provide innovative benefits packages that could include additional professional development, bonus pay, retention and sign-on bonuses, generous scholarships and tuition remission, and other perks. Many of these are disallowed costs.

Public schools have flexibility to offer bonuses and other incentives that private schools are prohibited from offering. For example, Newark’s collective bargaining agreement from 2020 shows it can offer discretionary bonuses of up to \$4,000 to teachers who join the district if they teach in a critical certification area. (NJ School Boards Association). Such programs are not considered allowable costs for APSSDs.

Public school benefits for health care and retirement, which are funded by state tax dollars, are far more attractive than those that can be offered at APSSDs.

4. Incomplete and Outdated Salary Guide for Contracted Professionals

While the NJDOE salary guide for APSSDs includes some contracted professionals (OT, PT, and Speech Therapists), other contracted professionals, including Board Certified Behavior Analysts (BCBAs), psychiatrists, and physicians are not addressed. Instead, NJDOE requires APSSDs to use maximum hourly rates for some of these professionals based on the *lowest* maximum salary in that county for a “comparable position.” Using this formula, the rate for a BCBA in Bergen County is \$69.89/hour – the highest in the state. In Sussex county, the BCBA rate is \$55/hour. The market rate is \$90-\$100/hour. The highest rate that can be paid to a consulting psychiatrist is \$142/hr. Private schools often need consulting psychiatrists and physicians with experience in treating complex conditions.

Public schools are allowed to pay far more for the same service and often do.

A-2514, now pending in the legislature, would allow APSSDs to pay licensed healthcare consultants a statewide average of the rate paid by our public school colleagues at Special Services School Districts and Educational Services Commissions. The bill can be accessed here: https://pub.njleg.state.nj.us/Bills/2022/A3000/2514_I1.PDF

“NJDOE program monitors have recommended that we hire a full-time BCBA on staff. We have tried, but the state’s “salary cap” for that position prevents us from hiring. For a BCBA salary in a private school, we are capped at \$68/hour, but in our county, the average salary is \$90-\$100/hr. It is not a surprise that we cannot hire someone.”

- An ASAH School Leader

Recommended Policy Changes

1. NJDOE should complete a formal salary and benefits study, and make necessary changes to allow APSSDs to offer competitive compensation packages.¹
2. NJDOE should update outdated salary “caps.”
3. NJDOE should establish reasonable salary and rate guides for a broad range of specialists and outside contractors, such as psychiatrists, BCBAs, physicians, and other professionals.
4. NJ leaders should enact A-2514 and make the provisions effective immediately.

(1)N.J.A.C. 6A:23A-18.3 (o)(3) requires NJDOE to initiate a study examining the maximum allowable salary structure. In conducting the study, the Department may seek and/or include input from an APSSD representative(s). The study shall include a data-driven review of maximum salaries and recommendations, if any, for changes to the maximum allowable salary calculation formula contained. The study has not been completed.

III. Career Ladder, Professional Growth, and Leadership Development

Educators need accessible, affordable, and visible ways to advance in their careers. NJDOE fiscal code for APSSDs, as it relates to professional development, has significantly constricted the range and scope of professional development opportunities that APSSDs can offer staff.

Recommended Policy Changes

1. Expand allowable costs to include more spending for professional development.
2. Provide more generous stipends and/or tuition remission to new teachers in exchange for a commitment to teach complex special education students for a period of 3-5 years.
3. Provide state funding for tuition remission to support paraprofessionals as they pursue teaching credentials.

IV. Teacher Preparation Programs

Teacher preparation programs set the tone and expectations for the next generation of our state's teachers and classrooms. While each college and university sets its own process for teacher prep, it is done in accordance with state standards. In New Jersey, there is very little focus on the needs of students with severe or complex disabilities.

Some of New Jersey's teacher preparation programs send their students to student teaching positions at APSSDs, but most do not. As a result, most educators are not familiar with or exposed to APSSDs or the education of students with severe disabilities. They lack awareness about professional opportunities at APSSDs.

Recommended Policy Change

1. Teacher preparation programs should develop and promote tracks for educators to teach students with severe and profound disabilities.
2. Teacher preparation programs should be encouraged to place student teachers at APSSDs.
3. NJDOE should allow employment opportunities at APSSDs to be listed alongside those of public LEAs on NJDOE website under Education Employment Opportunities in NJ.
4. State education stakeholder groups should engage leaders from APSSDs in mentorship roles with NJ Association of School Business Administrators, NJ Leader to Leader, and NJ Excel.

V. Staff Retention

APSSDs work to create a unique climate and culture that encourages teamwork and innovation. Many APSSDs operate as 12-month programs, making it hard for staff to take the summer months off, like their public school colleagues. Staff retention efforts must reflect the intensity and duration of the position.

Recent research shows that there are many factors influencing retention of staff at APSSDs, including pay and compensation packages, HR strategies, employee recognition programs, opportunities for growth and leadership, training and professional development, and support with highly challenging student populations ²

Recommended Policy Changes

Fiscal flexibility must allow APSSDs to engage in staff retention strategies, and have costs associated with such efforts included in allowable costs.

1. Increase the cap on payout for unused paid time off in order to remove the incentive to use the days.
2. Allow APSSDs to offer stipends based on years of service.
3. Increase caps on professional development costs to allow APSSDs to train and develop a crisis team that can step in when teachers need help in the classroom.

(2) Farinola, Leah M., "Factors Influencing the Retention of Teachers in Private Schools Serving Students with Autism" (2021). Seton Hall University Dissertations and Theses (ETDs). 2842. <https://scholarship.shu.edu/dissertations/2842>

Summary

While the national and statewide shortage of school staff is affecting ALL students, there are unique challenges *and unique solutions* to better serve the 10,000 public school students with disabilities who are placed by sending districts in New Jersey's approved private schools for students with disabilities.

Many of the recommendations contained in this report are otherwise unlikely to be part of the larger discussion, because they impact such a relatively small group of students, and affect a segment of the special education placement continuum that is typically left out of policy decisions: APSSDs.

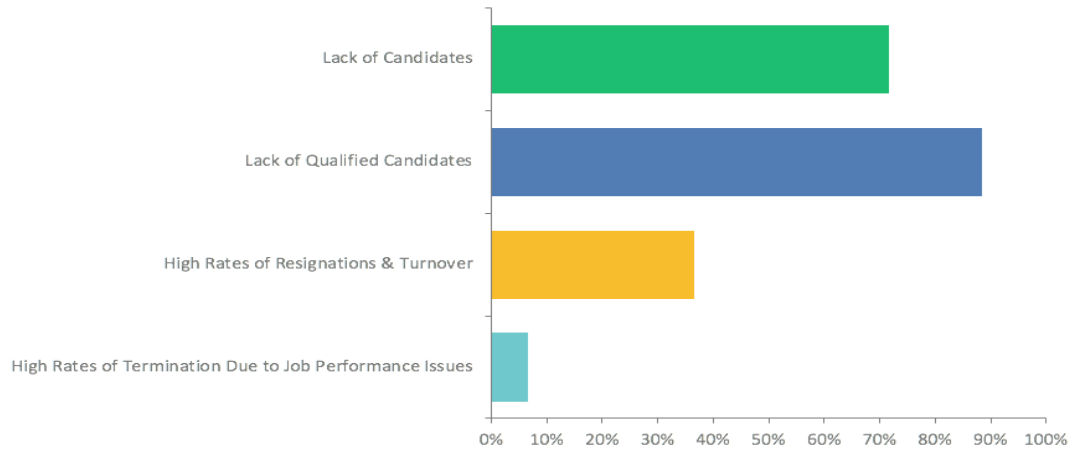
The good news is that most of these recommendations can be addressed through changes in regulation, policy and practice, and will not require legislative action. Most of the recommendations can be acted upon quickly, leading to a near immediate relief in some areas.

Students are in crisis. Schools are in crisis.

Just because the group is small, does not mean that these children and the schools trusted to serve them are not important. ASAH is therefore hopeful that this report will be carefully considered by our state's policy makers and key stakeholders.

APPENDIX A: Survey Results

Greatest staffing challenge



Negative Impact of Staffing Crisis on Students and Operations

