Issue Brief

### Centralized Standards, Local Control: New School Network Seeks to Offer Jewish Families Greater Choice *Ray Domanico*

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#### Introduction

For 30 years, the Jewish group Chabad has operated a prekindergarten program for 2- to 4-year-old children on Manhattan's Upper West Side. According to Rabbi Meir Ossey,<sup>1</sup> associate director of Chabad of the West Side, they were often asked by parents of their students if they had ever considered growing the early childhood center into a full elementary school, with grades from prekindergarten through eight. They had, he told me, but the challenge of starting a whole school seemed formidable, and their area of Manhattan was already home to several established Jewish day schools. Then a solution appeared. A newly formed organization, Tamim Academy, approached the West Side group and asked if they were interested in sponsoring a new elementary school using the model pedagogy and structure designed by Tamim.

Tamim is an organization designed as a school network, much like those found in the charter school sector, among innovative public schools, and in smaller numbers in other corners of the private school sector.<sup>2</sup> For over 20 years, reform-minded leaders in those sectors have sought the proper organization structure to successfully balance the need for uniform quality control while giving individual schools of high quality the flexibility and autonomy to respond to the needs of their own communities.

The Tamim model strives to combine educational excellence with core religious values and education, all within the context of a built-in network of local religious leaders committed to building and sustaining strong and supportive relationships between families and these schools. If this experiment works, it may provide school leaders as well as policymakers with a model of effective religious education within a larger pluralistic approach to education.

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The Manhattan Institute is a think tank whose mission is to develop and disseminate new ideas that foster greater economic choice and individual responsibility. While some large public school districts embrace the portfolio model—where traditional public schools operate more like charter schools with more autonomy but with intermediary organizations to oversee new school creation and supervision<sup>3</sup>—charter school oversight is split between the network model, with back office, program development, and human resources / professional development housed in a central office and stand-alone schools that retain all functions within the school. Private and religious schools have been the least likely to form networks: nonreligious private schools rarely form networks, and few religious schools have done so.

Tamim Academies operate in Jewish communities in six cities around the country (Austin, TX; Boca Raton, FL; Greenwich, CT; Upper West Side, NY; Salt Lake City, UT; and Burlington, VT) and one in Canada.<sup>4</sup> Five more schools are coming in fall 2022 (Cambridge, MA; Los Angeles, CA; Miami, FL; Queens, NY; and North York, Ontario, Canada). Tamim reports that other cities are on a waiting list for openings in future years. Tamim is built on the notion of expanding existing prekindergarten programs associated with local Chabad Jewish centers into full elementary schools. In the coming school year, its oldest schools will be operational through grade four. While the husband-and-wife teams that lead Chabad centers are themselves *haredi*, the schools—in line with Chabad's general approach—are designed to serve any Jewish child, whatever level of religious belief or practice their parents observe. Some of the preschools also serve non-Jewish children.

# The Schools' Philosophy: What Is Chabad-Lubavitch?

Chabad-Lubavitch is the amalgamated name of a Hasidic movement founded 250 years ago, with "Chabad" referring to the name of its philosophy and "Lubavitch" referring to the name of the Russian village where it was centered for over 100 years. The word Chabad, according to Chabad.org, the website run by the movement, is a Hebrew acronym for the three intellectual faculties of *chochmah*—wisdom; *binah*—comprehension; and *da'at*—knowledge.<sup>5</sup> Fleeing the Holocaust, the leaders of this movement came to the U.S. and based their community in the Crown Heights neighborhood of Brooklyn. Hasidic groups are led by a rabbi known as a rebbe, and Chabad has had seven rebbes since its founding. Under the leadership of the seventh rebbe, Rabbi Menachem Mendel Schneerson (1902–94), the movement grew in numbers and influence. In their own words, the leaders of Chabad "concerned themselves not only with Chabad-Lubavitch, but with the totality of Jewish life, spiritual and physical. No person or detail was too small or insignificant for their love and dedication."<sup>6</sup> Today, they report the existence of 2,000 "emissaries" dispatched by the rebbe (to serve Jewish people of all traditions, including the nonobservant) in the U.S. and 5,000 such emissaries leading communities in more than 100 countries worldwide.<sup>7</sup>

In the U.S., the group's first foray into the broader education system began in 1942 and made use of New York State's "release time" program, where students could use the time for off-campus private religious education.<sup>8</sup> (As a Catholic school student in the 1960s, I was "released" from school early every Wednesday afternoon, and Catholic school kids in public schools, similarly released, could come to our school for religious teaching.) Lubavitch educators used this same opportunity to operate basic Torah instruction for one hour a week for Jewish public school students.

Chabad.org reports that there are now more than 400 Chabad-affiliated early childhood centers in North America.<sup>9</sup> Each center is under the auspices of locally based representatives. In addition, according to the latest census of Jewish day schools in the U.S., there were 78 Jewish day

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schools operating in 2018–19 that were affiliated with Chabad; these schools served 13,851 students in grades K–12. As the report of this census describes, "The largest [of these schools] in enrollment, mainly located in Brooklyn, educates children from Chabad homes. These schools have a strong Lubavitch student body and orientation." A second group of Chabad-affiliated K–12 schools "may be regarded as outreach schools established by the emissaries to primarily serve local families that themselves are not Chabad. The attraction for parents, many of them ex-Israelis, is a Judaic curriculum and ambiance, as well as remarkably low tuition charges."<sup>10</sup>

#### Tamim Academies: A New Education Model Is Born

The Tamim Academies are a new project, and they are of the second type, designed to serve Jewish children of all traditions or beliefs. They are growing into full elementary schools out of existing Chabad-affiliated preschools. Each school is independently sponsored by local Chabad centers and the local emissaries. These schools are initiated by the local community, which is responsible for raising necessary funds and recruiting students. The schools in the Tamim network receive programmatic and financial startup support from Tamim HQ. The central team develops and provides curriculum and attendant materials to the schools, manages the back-office systems, and oversees human resources, including teacher recruitment and professional development. With privately raised funds, Tamim HQ also provides funding of startup costs that schools can use for anything from purchasing furniture and technology to salaries and scholarships. Tamim also plans to raise a separate fund to which schools can apply and receive matching grants for scholarships.<sup>11</sup>

Tamim's education model combines approaches found in the best public and private schools: individualized instruction, a whole-child approach prizing both academics and social/emotional health, and high academic standards. The schools intend to prepare their graduates for the high school of their choice while also emphasizing the specific mission of Jewish schools: Judaic studies integrated into secular academic subjects, immersive Hebrew language instruction, and the conscious development of spiritual health alongside emotional health and academic achievement.

In the early grades, instruction in both English and Hebrew is phonics-based. The schools are using Common Core English<sup>12</sup> and Math<sup>13</sup> standards, Next Generation Science<sup>14</sup> standards, and ACTFL (a membership organization of language educators) World Language Milestones.<sup>15</sup> They also apply social studies milestones from the Learner-Centered Collaborative.<sup>16</sup> That organization appears to have developed another facet of Tamim's approach—its organization of learner outcomes into three areas: agency, connection, and citizenship.<sup>17</sup>

The Tamim model combines progressive education principles such as the whole-child and child-centered emphases with elements associated with modern school-reform policies, such as the use of a learning management platform to track student progress and the work that the students do on their school-supplied iPads. The Tamim schools are intentional about student assessment, testing students four times a year to measure their progress and to diagnose areas of need. In the early grades, the network uses two teachers in each classroom to facilitate children's learning and to provide one-on-one assistance when needed.

A unique aspect of Tamim's program is the infusion of Judaic studies into all aspects of the curriculum, rather than the traditional allotment of having some hours of the school day assigned to religious training. Tamim Executive Director Holly Cohen described the pairing of academics and Judaic studies at Tamim:

Tamim's curriculum contemplates the whole child. It weaves Judaic and general content together with the requisite skills in an environment that embraces the challenge of educating for social-emotional and spiritual growth. Life skills sourced in Jewish tradition are aligned with Common Core standards; science and social studies are integrated with parsha<sup>18</sup> and Chumash;<sup>19</sup> our reading curriculum is built on the science of reading and naturally familiarizes students with words and phrases from Tefila<sup>20</sup> and Torah.<sup>21</sup> The curriculum pushes past the rudimentary paradigm of isolating "real life" from Jewish life and fosters the whole child, giving students the skills, confidence and context to succeed and make a unique difference in an increasingly complex world.

It was Cohen's vision that led to the creation of the Tamim school network. She worked in Jewish philanthropy for 10 years as executive director of the Kohelet Foundation, channeling her activity solely toward improving Jewish day schools and increasing their enrollment. As Sarah Ogince reported in Lubavitch International magazine, the foundation actively funded scholarship programs, STEM, parent learning programs, and blended learning, but systemic improvement did not come easily.<sup>22</sup> Cohen had long been contemplating the needs of many Jewish children who did not attend Jewish day schools. The annual census of these schools, produced by the Avi Chai Foundation, estimated that fewer than 15% of Jewish day school attendees were non-Orthodox.23 For many of their parents, in Cohen's mind, the public schools seemed the best option for ensuring that their children would get the high-quality, college-preparatory academic training that they wanted. Also, the traditional approach of many fine Jewish day schools-which attempts to replicate the entirety of the secular education of the public schools in half the time (the other half dedicated to Jewish studies)—left little time for the individualized instruction that some families prized. Like many driven and talented educators in schools in all sectorsprivate, district-run, and charter-Cohen realized that it is sometimes easier and more effective to start anew, with a new school design and approach, than it is to try to change existing schools and their well-established cultures. She suggested to the benefactor of Kohelet, David Magerman, that they "start from scratch, white box, and build the school that we know is possible."<sup>24</sup>

Cohen's first effort, built with a highly skilled team, is the Kohelet Yeshiva Lab School. It opened in 2016 in Pennsylvania and now serves students through middle school. To expand the model, she thought of a kind of franchise approach, with program design and content centralized and operations handled locally. Already impressed by the extent of the Chabad network, their popular preschools, and their willingness to take on demanding work in a variety of areas, she pursued a partnership with Chabad.

The Tamim model is intentionally designed to be amenable to replication in new communities. The centralization of administrative functions and program planning in headquarters means that new schools do not have to design these things themselves. Tamim headquarters even provided a detailed financial plan to prospective school sponsors, so they know what it will take to grow and sustain these schools. As with all educational efforts these days, staff recruitment remains a challenge. Teachers in these schools must not only be professionally competent but must also embrace the model's approach and be able to implement it enthusiastically. Cohen dreams of starting a master's degree program to train their own teacher corps.

# Launching—and Succeeding—on the Upper West Side

The Upper West Side Tamim Academy opened in 2020, just as Covid and attendant school closures were driving parents out of New York City or requiring them to keep their young children at home rather than sending them to school. Still, the school persisted, and it is now in its second year of operation, serving a small number of students in one classroom containing grades kindergarten and one, with plans to continue to grow.

Though currently quite small, this school has a solid grounding in the core principles that have been found to facilitate the success of schools in all sectors. It is deeply driven by a sense of mission—to help each child become the best person that he or she can be, not just the best student—though the school is also committed to high academics. The Upper West Side Tamim Academy and its partner organization, Chabad, work intentionally to build the relational trust between family and school that must be present for any school to survive.

Tamim is part of the larger Chabad West Side community, which prides itself on being open and welcoming. They meet each child and each family "where they are." Members of Chabad are observant Orthodox Jews. Their interactions with other Jews, including the parents who send their children to Tamim, do not involve lecturing, shaming, or criticizing. Rather, as members of the community tend to put it, "we do what we do," leaving it to the families to come to their own understanding of the best way for them to express or practice their own Jewish identity. The leaders of the West Side effort believe that this approach allows members of New York City's highly diverse Jewish community to be able to live their own Jewish identity and develop their children's own sense of self without having to place themselves in one of the many categories of Judaism found in the city's neighborhoods.

Parents seem to be committed to the individualized learning and whole-child approach to teaching and learning. A number of parents appearing on the network's YouTube channel describe the schools as promoting a "passion for learning"; ensuring that children will be able to "learn on [their] own individual level"; and "open[ing] up a whole new world for Jewish families."<sup>25</sup> During Covid and the closure of public schools to in-person learning, these parents noted that Tamim's "small group environment feels a lot safer" for their child. One family noted that they believed that the school would foster their children's "confidence in their individuality and in their Jewish identity," teaching them that "they can achieve whatever they put their mind to."<sup>26</sup>

In another promotional video, parents noted that "what public schools didn't teach was really character" and that the public system failed them in the past and "took away our innocence." "Kids are losing their childhood these days," one mother remarks. "You want them to just be in a place where they get their childhood."<sup>27</sup> This is the power of school choice—parents being free to choose a school that not only provides academic rigor but also respects their child's individuality in ways that enforce the family's culture and values.

Launching a new network of elementary schools at the outset of a two-year disruption of all schooling due to Covid was particularly challenging, given the reluctance of many parents to send their youngest children to school. In the 2020–21 school year, 36 children were enrolled in Tamim schools. During this most recent academic year (2021–22), 86 children were enrolled. Network staff sense a slow return to normalcy and are expecting about 245 students to be attending in the fall of 2022, including students in the five new schools.

#### Building Trust Through Central Design but Local Control

For many on the center-right politically, 2021 was the year of school choice. Twenty-two states adopted or expanded laws allowing some form of public subsidy for tuition paid to private or religious schools.<sup>28</sup> Then, in June 2022, the Supreme Court ruled in *Carson v. Makin* that Maine's tuition-assistance program in rural school districts could not exclude faith-based schools.<sup>29</sup> The freedom to choose is a good and inclusive value, allowing individual families some control over how and where their children are educated. This movement has been growing for over 20 years, but its success continues to depend upon the growth of private or religious schools to meet the growth in parental demand engendered by the new or expanded school choice programs.

Yet while school choice programs that include support for private and religious schools have spurred enrollment growth in some urban areas, they have not been enough to stem overall enrollment declines in these schools.<sup>30</sup> Jewish schools are unique in some ways. First, they have always been a small portion of the overall private/religious school sector, accounting for 265,000 students, or about 5.7% of private/religious school enrollment in 2019–20.<sup>31</sup> As the founders of Tamim note, they also educate only a tiny percentage of all Jewish students in the country. The Steinhardt Center at Brandeis University estimated the number of Jewish children in the country to be 1.6 million.<sup>32</sup> Thus, less than 20% of Jewish children attend Jewish day schools. Tamim's founders and supporters hope to change that statistic over time.

In doing so, they are following a model that seems to have worked in the growing and successful charter school sector: the creation of a school network that separates school design from local creation and support. It intends to create high quality with its uniform program design and curriculum choices and to maintain that quality through programmatic review and professional development. Tamim HQ assists teachers who may be struggling by observing them and offering constructive feedback. Each Tamim classroom has a camera in place, which can be turned on for virtual observation and feedback. Tamim HQ similarly utilizes this technology to ensure that its high bar for academic excellence is consistently met.

In pursuing this hybrid model of central design and local control, the role of the Chabad emissaries may turn out to be crucial. Schools in all sectors—public, private, and religious—can work only when there is mutual trust among the educators in the schools and the families that choose to send their children to those schools. Covid shutdowns, culture wars over curriculum and values, and other stresses have frayed that trust in many parts of the country. Existing private and religious schools have not been immune to those stresses. The Chabad/Tamim partnership may have a unique form of social capital to apply to grow and sustain these new schools. Chabad.org explains the purpose and approach of the local Chabad Houses and emissaries as a place of connection and understanding:

The Baal Shem Tov ["a great Jew of 18th-century Eastern Europe"] taught us to look deeper, beyond the knowledge of a person, beyond his outward behavior, into the depths of his heart, to find there the divine spark and reveal it with unconditional love.... The approach of Chabad today mirrors that of the Baal Shem Tov in his time: Look past the outward person and trust in the soul deep inside. You may disapprove of everything he does, and his outlook on life may be the opposite of everything you believe. Don't argue with him. Instead, be one with him. Unconditionally. You enjoy Shabbat—enjoy it with him. You find solace and counsel in the wisdom of Torah—talk to your

М

holy brothers and sisters about that wisdom in their own language, on their own terms. And if he or she does not change one iota, that is irrelevant. You have done your job of love. Two Jews became one and that is all that matters.

A Chabad House, then, is a center established to facilitate all of the above. A Chabad House will generally host classes, lectures, and workshops on Jewish topics; religious services; Shabbat meals; and special events as needed in that community.<sup>33</sup>

That embrace of the whole of Jewish identity without trying to compel compliance is seen in the Upper West Side Tamim/Chabad partnership. Pearl Stroh, head of the prekindergarten program and operational director of the Tamim Academy, told me that every Jewish holiday is celebrated at the school, and parents are always welcome. Explaining that some of their families are transient, perhaps in New York only for the length of their medical residency or for a temporary work assignment, the school and Chabad rabbis make sure that families who may not have family connections in New York know that there is a place for them at someone's seder or other seasonal commemoration.

In secular terms, the Chabad emissaries are building relationships with and within the community they serve. Those relationships are the basis of relational trust, a core element of school success. This has never been truer than today. As a result of the pandemic-related disruption to normal school activities in many locales, a division has opened between parents and school professionals in many communities—a division rooted in frustration with remote instruction, mask mandates, and vaccination requirements, or discontent with curriculum. For schooling in all sectors to thrive, school leaders, politicians, and parent groups need to find a way to work together to rebuild relationships of trust among schools and families.

The Tamim schools are established by local need and choice. While it is primarily the role of the educators in the schools to earn and maintain the trust of their students' parents, it cannot hurt to have an intermediary who is known and trusted by families as well as educators. Even with the best of intentions, schools can become contentious, and the boundaries between parents and school responsibilities may not always be clear. Working with people on their own terms and in full appreciation of their values seems like a good basis for schools and families to work together for the common good of children.

# Conclusion and Implications for Educators and Policymakers

The Tamim model reinforces what we have learned from successful schools in both the public and private sectors and offers lessons for school leaders and public policymakers alike.

- The history of public charter schools indicates that, while single stand-alone schools can and do succeed, there are efficiencies and performance enhancements associated with wellformed school networks. Tamim is bringing this approach to a small but important portion of the private school sector—Jewish day schools. If it succeeds, other Jewish day schools may consider forming networks.
- Although the Catholic school system in our country has been in decline for generations,<sup>34</sup> there are some bright spots within this sector. Partnership Schools, for instance, is a successful and growing network of inner-city Catholic schools in New York and Cleveland.<sup>35</sup> The

creation of a Jewish day school network is another piece of evidence in favor of the network model. Leaders of the nation's Catholic and other religious schools might consider the lessons of these existing and new religious school networks.

- Tamim's model explicitly merges Jewish studies with secular studies. Embedded in the Tamim model is a belief that, for some families, the religious and secular aspects of education cannot be relegated to separate boxes; they are intertwined. In the recently decided *Carson v. Makin*, the Supreme Court ruled that Maine's policy of excluding schools that "do religion" from participating in a school choice program, while including other private schools, violates the free exercise clause.<sup>36</sup> As a result of this ruling, schools like Tamim should be free to participate in state school choice programs in states where such programs exist and at their discretion. If states in which Tamim is operating have, or enact, public financing of private schools through vouchers, tax credits, or educational savings accounts, Tamim could take advantage of those programs to ease the financial burden of tuition for qualifying families.
- In the world of Jewish education, the Tamim model once again demonstrates that religious orthodoxy and secular studies can exist side by side, as many other Jewish day schools have demonstrated prior to Tamim. The tension between religious adherence and secular study is currently an issue in New York State, as the Board of Regents is considering new regulations for Orthodox Jewish schools and enhancing curriculum oversight.<sup>37</sup> Without presuming any wrongdoing on the part of yeshivas that have been accused of failing to meet the state's requirements for curriculum that is "substantially equivalent" to that of public schools, Tamim suggests that some middle ground is possible.
- In the traditional public school sector, a crisis in governance is unfolding. Concerns about the content of education, the right of parents to be informed and have a say in what their children are taught, and the willingness of district school boards to engage with parents in a respectful, two-way dialogue about school programs have undermined public trust in school boards and public schools in general in some locales. The network approach, as adopted by Tamim, Partnership Schools, and many charter schools could be a way to introduce greater pluralism into the public school system. Rather than imposing a one-size-fits-all approach on a diverse community with varying beliefs and educational priorities, the creation of various networks of schools, with different approaches and philosophies, could offer parents a choice more aligned with their own beliefs, under a general umbrella of core and commonly held beliefs about the purpose of public education.

### Endnotes

- <sup>1</sup> See the team that operates Chabad of the West Side, https://www.chabadwestside.org/ templates/articlecco\_cdo/aid/4461929/jewish/Our-Team.htm.
- <sup>2</sup> Tamim Academies are scattered throughout the country. See the school network, https:// tamimacademy.org/schools.
- <sup>3</sup> Matt Barnum, "A Chalkbeat Explainer: What Is the 'Portfolio Model' of Running Schools?" *Chalkbeat*, Mar. 8, 2019.
- <sup>4</sup> "Partners on the Ground: Chabad Communities," Tamim Academy, 2022.
- <sup>5</sup> "About Chabad-Lubavitch," Chabad.org, 2022.
- <sup>6</sup> Ibid.
- 7 Ibid.
- <sup>8</sup> "History: How Long Has Released Time Bible Education Been Around and How Did It Get Started?" *Released Time Bible Education* (blog), June 1, 2003.
- <sup>9</sup> Faygie Levy Holt, "The ABCs of Early-Childhood Education: Heritage Starts in the Classroom," *Chabad.org/News* (blog), Feb. 6, 2014.
- <sup>10</sup> Mordechai Besser, "A Census of Jewish Day Schools in the United States 2018–2019," Avi Chai Foundation, 2019.
- <sup>11</sup> This overview and the following descriptions of Tamim Academy are based in part on the author's interviews with Tamim representatives.
- <sup>12</sup> See Common Core's English Language Arts standards, http://www.corestandards.org/ ELA-Literacy.
- <sup>13</sup> See Common Core's Mathematics standards, http://www.corestandards.org/Math.
- <sup>14</sup> See Next Generation Science standards, https://www.nextgenscience.org/search-standards.
- <sup>15</sup> See ACTFL's "world-readiness standards for learning languages," https://www.actfl.org/ sites/default/files/publications/standards/World-ReadinessStandardsforLearningLanguages.pdf.
- <sup>16</sup> Learner-Centered Collaborative, https://learnercentered.org.
- <sup>17</sup> Tamim Academy's "learner outcomes" can be found at https://tamimacademy.org/ learner-outcomes.
- Parsha: the weekly Torah portion that is read on Shabbat (a day of rest that begins at sunset on Friday and ends after nightfall on Saturday; also referred to as Shabbos or Sabbath).
- <sup>19</sup> Chumash: the Five Books of Moses, also known as the Pentateuch.

- <sup>20</sup> Tefila: sometimes described as "prayer" but the concept is deeper; "a labor of awakening the hidden love within the heart until a state of intimate union with the divine is achieved," as stated by Chabad.org, https://www.chabad.org/library/article\_cdo/aid/1452805/jewish/ Tefillah.htm. A closer translation than prayer might be "communion," defined as a joining together of mind and spirit.
- <sup>21</sup> Torah: most commonly, the Five Books of Moses (Chumash); Torah also refers to the parchment scroll version that is kept in the ark of the synagogue, to be read during services.
- <sup>22</sup> Sarah Ogince, "The New Day Schools," *Lubavitch International*, Spring 2021.
- <sup>23</sup> Besser, "A Census of Jewish Day Schools in the United States 2018–2019."
- <sup>24</sup> Ogince, "The New Day Schools."
- <sup>25</sup> "Tamim Academy Summer 2020," Tamim HQ YouTube channel, July 22, 2020.
- <sup>26</sup> Ibid.
- <sup>27</sup> "Tamim Academy Invitation Film," Tamim HQ YouTube channel, Dec. 3, 2020.
- <sup>28</sup> Robert C. Enlow, "The ABCs of School Choice," EdChoice, 2022.
- <sup>29</sup> Nicole Stelle Garnett, "A Victory for Religious Liberty and Educational Pluralism," *City Journal*, June 22, 2022.
- <sup>30</sup> Digest of Education Statistics, "Table 105.30. Enrollment in Elementary, Secondary, and Degree-Granting Postsecondary Institutions, by Level and Control of Institution," National Center for Education Statistics, 2020.
- <sup>31</sup> Stephen P. Broughman et al., "Characteristics of Private Schools in the United States: Results from the 2019–20 Private School Universe Survey," Institute of Education Sciences, September 2021.
- <sup>32</sup> Leonard Saxe et al., "American Jewish Population Estimates 2020 Summary & Highlights," American Jewish Population Project, Steinhardt Social Research Institute, May 18, 2021.
- <sup>33</sup> "What Is Chabad? Frequently Asked Questions," Chabad.org.
- <sup>34</sup> Kathleen Porter-Magee, Annie Smith, and Matt Klausmeier, "Catholic School Enrollment Boomed During Covid. Let's Make It More than a One-Time Bump," Manhattan Institute, June 23, 2022.
- <sup>35</sup> "Partnership Schools Enrollment Report," Partnership Schools, February 2021.
- <sup>36</sup> Carson, as Parent and Next Friend of O.C., et al. v. Makin, 596 U.S. (2022).
- <sup>37</sup> Ray Domanico, "New York's Parents Are Exercising Their School Options: We Need to Rethink the Meaning of Public Education," Manhattan Institute, June 2022.