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Boards of Education of City of Bridgeton,
Burlington City, City of East Orange,
City of Perth Amboy,
Town of Phillipsburg and
City of Trenton

RAYMOND ARTHUR ABBOTT, ET AL.,

Plaintiffs

v.

FRED G. BURKE, ET AL.,

Defendants

SUPREME COURT OF NEW JERSEY

DOCKET NO. 42,170

CIVIL ACTION

CERTIFICATION OF JOHN M. RODECKER

John M. Rodecker, of full age, hereby certifies as follows:

1. I am the Superintendent of the City of Perth Amboy School District ("District"), an Abbott district under this Court's Abbott rulings. I make this Certification in support of the Motion of the Movants-Intervenors to intervene in this action in support of the Education Law Center's motion in aid of litigants' rights and to provide the Court with information on the specific impact of the severe reduction in State aid on

the City of Perth Amboy Public School District's programs, services and positions in the 2010-2011 school year.

2. I have overall responsibility for implementing the programs and reforms in the District to enable all students to achieve the New Jersey Core Curriculum Content Standards ("NJCCCS").

3. The District has a total enrollment of 9,978 students. The breakdown of the student population is 90% Hispanic, 7% Black, and 2% White. 77% of the students qualify for free or reduced lunch. Most of our students are Spanish-speaking and come from single parent households.

4. If the formulaic State aid funding categories in the School Funding Reform Act ("SFRA") had been fully funded in FY2011 in accordance with the SFRA's provisions, the District would have received State formula aid in the amount of \$129,829,134. Because of the reductions in formulaic aid in the FY2011 budget, the District will receive State aid in the amount of \$121,435,934, or a reduction of \$8,393,200 below the formulaic amounts required by the SFRA and deemed necessary under the SFRA to provide our disadvantaged students with a Thorough and Efficient Education.

5. This funding reduction does not include the loss of a significant increase in Education Adequacy Aid the District

anticipated for the 2010-2011 school year based upon prior communications from the Department of Education with details of the impact of the SFRA on the District. Although the District was formerly advised by the Department of Education, shortly after enactment of the SFRA, that it would receive over \$13 million in Education Adequacy Aid in 2010-2011, the District actually received only \$3,575,631 in such aid for the 2010-2011 school year, the same amount of Education Adequacy Aid the District received in 2009-2010.

6. As a result of this reduction in SFRA aid, the District had to eliminate over sixty (60) positions, including six (6) tenured teachers, thirty-three (33) non-tenured teachers, seven (7) security guards, six (6) academic coaches, five (5) guidance counselors, three (3) Vice Principals, five (5) nurses, seven (7) custodial positions, and six (6) parent liaisons/coordinators.

7. The District also had to eliminate all field trips, significantly reduce classroom materials, reduce after school programs, and eliminate 50% of the middle school athletic programs.

8. The reductions in teaching staff will have a direct and adverse impact on the delivery of educational services to our students and on class sizes in the District, which could

exceed the levels required by Department of Education regulations.

9. The academic coaches worked in the classroom with less experienced teachers in Language Arts and Math by modeling lessons and by providing regular instructional guidance. The elimination of these positions will deprive our students of the considerable classroom instructional benefits they provided.

10. The elimination of the nurse positions will preclude coverage if a nurse is absent or away from the nurse's office. The District previously was able to provide overlapping coverage to ensure there was always a nurse available to address medical emergencies and the dispensing of medication. The District is now vulnerable to potentially serious problems arising from the shortage of nursing staff, particularly since our students have limited access to routine medical care.

11. The District has a significant need for at least two guidance counselors in each elementary school to address student populations of upwards of 600 students. However, the funding cuts required the elimination of one guidance counselor in each elementary school so only one guidance counselor will be available in each school in the 2010-2011 school year to address the needs of a largely disadvantaged Spanish-speaking

student population whose needs were not fully met with two guidance counselors in prior years.

12. The elimination of 7 security guards, which are needed to curb school violence and increase school security, will adversely affect the District's ability to maintain effective violence prevention and ensure a safe and secure school environment for both students and teachers.

13. Because of funding reductions, field trips have been totally eliminated. Field trips provide the opportunity for our disadvantaged and largely Spanish-speaking students to have enriching experiences in museums and other venues outside of their school or community. The families of our students frequently do not have the financial resources or time to provide these opportunities for their children so school field trips provide the only way for our disadvantaged students to gain access to these educational experiences.

14. The reduction in custodial staff will also jeopardize the District's mission of ensuring the health and safety of our District's students in safe and secure facilities.

16. These staff reductions undermine the District's ability to ensure that our students meet the New Jersey Core Curriculum Content Standards and to continue to provide the

demonstrably needed supplemental programs and services to our students to address their special needs.

17. The District understood that the Abbott supplemental funding and parity remedies had been eliminated by the Court because the SFRA, when fully funded, would provide adequate funding to enable the Abbott districts to provide a thorough and efficient education to our students and to provide the additional programs, services and positions needed for our at-risk disadvantaged students.

18. Without the required formulaic aid under the SFRA to ensure sufficient funding to meet the requirements of the Thorough and Efficient Education Clause, the District will not have adequate funding for programs, staff and positions to enable our students to meet New Jersey's academic standards.

19. Without the required formulaic aid under the SFRA, the District will lack funding to provide the supplemental programs our students need and that SFRA was designed to enable us to deliver to address those needs.

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

John M. Rodecker

Dated: August 2, 2010