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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 DR. RODNEY LOFTON

Dr. Rodney Lofton, of full age, hereby certifies as follows:

1. I am the Superintendent of the City of Trenton Public 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 Trenton 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 11,387 students. The student population is 58% Black, 38% Hispanic, 2% White, 1% Asian and 1% other. 80% of the students qualify for free or reduced lunch.

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 \$227,907,506. Because of the reductions in formulaic aid in the FY2011 budget, the District will receive State aid in the amount of \$215,362,489, or a reduction of \$12,545,007 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. If the District had received flat funding for the 2010-2011 school year, the District would still have had a shortfall of approximately \$5.7 million because of increases in nondiscretionary expenditures.

5. As a result of this reduction in SFRA aid, the District had to eliminate two hundred eighteen (218) positions. Critical areas of the District's instructional program and student support services have been eliminated, or severely and negatively impacted, by these cuts.

6. Among the positions eliminated are four (4) directors of academic areas; one (1) director and five (5) coordinators who addressed the specific educational and programmatic needs of our disadvantaged students; three (3) Vice Principals; five (5) Teacher Specialists; four (4) Nurses; two (2) Social Workers; four (4) Substance Abuse Counselors; twenty-six (26) Literacy and Math coaches; forty-two (42) Support Staff; eighty-five (85) Education Enforcement Officers; one (1) Media Assistant; six (6) Custodians; and eleven (11) mechanics and laborers.

7. The eliminated Director positions include the Director of Technology, the Director of Elementary Education, the Director of Secondary Education, and the Director of Bilingual Education. The elimination of these Directors and the Vice Principals will impair the quality of instruction in the District since these individuals provide essential professional development and effective instructional modeling and strategies to the teaching staff. Without these leadership positions, the

overall supervision and coordination of important aspects of the District's educational program will be seriously undermined.

8. The eliminated Coordinator positions include the Coordinator of Truancy, the Coordinator of Testing, the Coordinator of Security, and the Coordinator of Parent Liaisons. The Director of Security has also been eliminated. The Coordinator of Testing and the Coordinator of Parent Liaisons have been responsible for the effective and efficient organization and delivery of important educational, programmatic and support services for our disadvantaged student population. The Coordinator of Truancy ensured that appropriate services and support were provided to truant students to facilitate their return to school. The Director of Security and Coordinator of Security ensured that security personnel were appropriately assigned and dispatched to provide safe and secure school environments for our students and teachers. Without these positions, the District will lack the supervisory personnel to coordinate and effectively provide necessary and important services for the District and its students.

9. The elimination of all the Literacy and Math Coaches will have a devastating impact on our younger students. These

coaches were responsible for ensuring that all students were performing at grade level by the third grade. The complete elimination of these academic coaches will severely damage the District's ability to attain the critical educational objective of ensuring that our students fulfill grade level expectations in the New Jersey Core Curriculum Content Standards.

10. With the reduction of classroom Teacher Specialists, such as in art and music, the District will not be able to provide appropriate and necessary instruction in art and music for our students, whose poverty prevents their exposure elsewhere to such enriching educational opportunities.

11. The staff reductions will also result in the elimination of all of the non-Child Study Team social workers and nurses in the District. In addition, as mentioned above, the District had to eliminate the Coordinator of Parent Liaisons, the Coordinator of Truancy, and all of the substance abuse counselors. Because of these reductions, the District will not be able to provide essential supplemental programs relating to on-site social and health services, middle and high school social and health referral and coordination, and parental involvement.

12. Due to the elimination of the Substance Abuse Counselors and Social Workers, students will not receive the

extra support and assistance they need to be successful in school. In addition, the District's ability to provide appropriate and necessary intervention services will be severely limited.

13. The elimination of Education Enforcement Officers, who are needed to curb school violence and increase school security, will adversely affect the District's ability to maintain effective violence prevention and ensure school safety. Also, the reduction of Custodians, mechanics and laborers will negatively affect the safety and cleanliness of the schools, depriving our students of an appropriate educational environment and threatening their health and safety. The reduction of mechanics and laborers will also prevent the District from making necessary facilities repairs that interfere with learning, such as leaking roofs and defective and unsafe electrical and mechanical systems, in a timely manner.

14. These staff reductions threaten to eliminate many of the gains the District has made in closing the achievement gap between the District's students and students in the wealthier districts. The reductions also jeopardize the ability of our schools and District to make the annual yearly progress required under the No Child Left Behind Act.

15. 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 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.

16. 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.

17. Without the required formulaic aid under the SFRA, the District will lack funding to provide the essential 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.

Dr. Rodney Lofton

Dated: August 6, 2010