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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. H. VICTOR GILSON**

Dr. H. Victor Gilson, of full age, hereby certifies as follows:

1. I am the Superintendent of the Bridgeton 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

Bridgeton 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 5,003 students. The student population is 36% Black, 54% Hispanic, and 8% White. 89% 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 \$74,031,698. Because of the reductions in formulaic aid in the FY2011 budget, the District will receive State aid in the amount of \$70,478,136, or a reduction of \$3,553,562.00 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. As a result of this reduction in SFRA aid, the District had to eliminate ninety-seven (97) positions and is unable to fill 12 vacant positions, for a total elimination

of one hundred and nine (109) positions. All areas of the District's instructional program and student support services have been impacted by these cuts.

6. Among the positions eliminated are forty-six (46) teachers; fifteen (15) academic coaches (one reading and one math coach at each of the 6 elementary schools, and the math, language arts and social studies coaches at the high school); one (1) instructional facilitator; three (3) counselors; seven (7) social workers; two (2) Education Enforcement Officers; five (5) teacher aides; and five (5) parent liaisons.

7. The reduction in teachers will cause an increase in class sizes at every grade level and will prevent the District from meeting Department of Education regulations on class size. The elimination of the coaches will impact on the quality of instruction in the District since the coaches provide essential professional development and effective instructional strategies to the teaching staff.

8. The staff reductions will also eliminate all of the non-Child Study Team social workers and anger management counselors. In addition, the District had to eliminate over 70% of the parent liaisons, 90% of the teacher tutors, and 50% of the substance abuse coordinators. Because of these reductions, the District will not be able to provide

demonstrably needed supplemental programs relating to literacy and math supports, the on-site social and health services, the middle and high school social and health referral and coordination, and parental involvement.

9. The literacy and math tutors were provided to ensure that all students were performing on grade level by the third grade. The 90% reduction of these tutors will have a severe negative impact on the District's ability to attain this critical educational objective of ensuring that our students attain grade level expectations in the New Jersey Core Curriculum Content Standards.

10. Because of the significant reduction in the number of counselors and social workers, fewer students will receive the extra support they need to be successful in school. In addition, the District's ability to provide appropriate and necessary intervention services will be severely limited.

11. The elimination of education enforcement officers, 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 school safety.

12. 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.

13. 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.

14. 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.

15. 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.

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Dr. H. Victor Gilson

Dated: July 29, 2010