

AFFIDAVIT OF MELANIE KOTLER

STATE OF NEW YORK)
)
COUNTY OF KINGS) ss.:

MELANIE KOTLER, being duly sworn, deposes, and states:

1. My name is Melanie Kotler and I’m a parent-member of the School Leadership Team (the “SLT”) at P.S. 169, which is a K-5 elementary school in Sunset Park, Brooklyn. I have a seven-year-old son who started kindergarten at P.S. 169 in Fall 2020 and will be entering second grade for the 2022-2023 school year.
2. My son was in pre-kindergarten when New York City public schools went fully remote in the Spring of 2020, at which time any semblance of learning ceased for our then-5-year old. We looked forward to school opening in Fall 2020, but, like most students in New York City, our son’s 2020-21 school year remained highly disrupted due to COVID, hybrid learning, and numerous school shut-downs throughout the year. Despite those challenges, however, he was lucky to have a very small hybrid kindergarten class with (at various times) only 6-8 students and one teacher. I recognize that this class size was extremely unusual, but it made sense given the context that P.S.169 had a much higher rate of parents electing to keep their children fully-remote. My son was in the privileged position of being able to attend in-person and benefitted from the very special learning environment created by his superstar teacher.
3. This past school year, 2021-22, our son entered a first grade dual language class with between 19-22 students throughout the year. While students encountered fewer disruptions overall, I could tell it was an incredibly challenging year as teachers faced many students who had never before been in a school building and as those teachers worked to try to “catch students up” on the

loss in educational opportunities that resulted from the interruption in their education the year before.

4. COVID is not over, and nor are these challenges. I'm afraid that larger class sizes will only cause more disruptions and challenges for P.S. 169 teachers and students.
5. It is through my membership on the SLT that I am aware of the current DOE budget process and the devastating cuts that will need to be made to essential services provided to students at P.S. 169 if the budget is not corrected and funds are not restored.
6. While I understand that P.S. 169's enrollment was already down by more than 200 students from before the pandemic, the DOE has projected that the school will lose an additional approximate 150 students for the upcoming school year. As a result of the DOE's projections, P.S. 169's Fair Student Funding was reduced by net \$1.6 million dollars. In response to that loss, the school has proposed the following cost-saving reductions in 2022-2023 expenditures, but, even accounting for these reductions, the school will still be in deficit by approximately \$600,000:
 - a. the school has proposed eliminating part-time positions including:
 - i. its three-day-a-week and ENL push-in teacher;
 - ii. its two-day-a-week ENL push-in teacher;
 - iii. its part-time administrator who is focused on Special Ed support;
 - iv. its part-time computer tech specialist;
 - v. its part-time music teacher; and
 - vi. four additional teachers who were not part of its permanent staff, but who provided extra support this past school year;

- b. the school will have no funds to pay for paraprofessionals for newly diagnosed special education students, which would potentially cause its inability to meet these children's special education needs;
 - c. the school will have no funds for afterschool programming;
 - d. the school can only fund half the substitute teachers it typically needs;
 - e. the school will have no funds to replenish supplies or equipment that breaks during the year;
 - f. the school will not be able to fund field trips;
 - g. the school will not be able to support the 5th grade's end-of-year activities;
 - h. the school will not be able to supplement the funds for language interpretation that DOE provides (which usually needs to be quadrupled to account for all the languages spoken by parents);
 - i. the school have no funding for staff developers/professional development time for staff;
 - j. the school will not be able to replenish classroom libraries or other activity materials and supplies in its younger grade classrooms; and
 - k. the school will not be able to retain the literacy coach who has been working with its K-2 teachers for the past several years, as the program that had been funding her to work in the school was eliminated.
7. In addition to the above, P.S. 169 might also have to excess up to three teacher positions. Up to now, the school has been able to keep class sizes low - in almost all cases under 25 students per class. Although keeping class sizes low will continue to be the school's priority, if it has to excess teachers, the school may have to reorganize classes and out-of-classroom positions. This would mean it could additionally lose:

- a. up to three teachers, as mentioned above (which could potentially include classroom, out-of-classroom, and/or art teachers);
 - b. a guidance counselor (PS 169 did not receive funds for a guidance counselor, though the mayor claims to have funded them for every school);
 - c. academic intervention and support teachers for coordinating the school's programs, or providing coaching support to its teachers;
 - d. the school's part-time business manager;
 - e. the school's dance residency for 4th graders;
 - f. the school's puppetry residency for lower grade dual language classes; and/or
 - g. cultural and arts-based assemblies for students in K-5.
8. I understand that the school administration at P.S. 169 believes that the DOE's projection for our additional loss of 150 students is unrealistically and unfairly low and that the cuts far exceed what is realistic. In fact, at the SLT's last update, P.S. 169's kindergarten registrations were already far above what the DOE projected and the school believes it will most likely be entitled to recover approximately \$500,000 once the budget is reconciled, but that does not typically occur until December or January. Such a late reconciliation (essentially a "true-up") will make it virtually impossible to anticipate and fill staff positions this summer, and it will mean the school will be starved for funds for the first half of the 2022-2023 school year. In reality, the programs and staff positions cut now are extremely unlikely to be restored next school year.
9. Our students deserve better. Something is clearly broken when federally-mandated special education services are at risk for one of our neediest student populations. And let's not forget how much all of our kids have already lost these last few years. It's hard to imagine cutting teachers, substitutes, and what very little educational and community

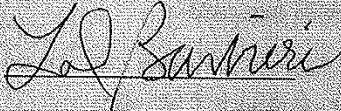
enrichment programming the school already had. I'm truly afraid of the lasting impact these cuts could have going forward.

Sworn to before me

this 5th day of July, 2022



Melanie Kotler



Notary Public

