

May 13, 2014

Eric Holder
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Educational Opportunities Section, PHB
Washington, D.C. 20530

Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Attorney General Eric Holder and Secretary Arne Duncan:

During this week that marks the 60th anniversary of *Brown v. Board of Education*, community organizations in Chicago, Newark, and New Orleans, all members of the national Journey for Justice Alliance, file three complaints under Title IV and Title VI of the Civil Rights of 1964 with the Education Opportunities Section of the Department of Justice's Civil Rights Division ("DOJ") and the Department of Education's Office for Civil Rights ("OCR").

As we commemorate the landmark civil rights victory that struck down the "separate but equal" doctrine and the system of codified racism in our public schools, we respectfully request that you open an investigation of the racially discriminatory school closings that are the subject of these complaints.

Journey for Justice is a coalition of grassroots organizations in twenty-one cities across the country. The coalition has come together because, across our communities, education "reformers" and privatizers are targeting neighborhood schools filled with children of color, and leaving behind devastation. By stealth, seizure, and sabotage, these corporate profiteers are closing and privatizing our schools, keeping public education for children of color, not only separate, not only unequal, but increasingly not public at all.

Adding insult to injury, the perpetrators of this injustice have cloaked themselves in the language of the Civil Rights Movement. But too many of the charter and privately-managed schools that have multiplied as replacements for our beloved neighborhood schools are test prep mills that promote prison-like environments, and seem to be geared at keeping young people of color controlled, undereducated, and dehumanized. Children of color are not collateral damage. Our communities are not collateral damage.

Thus, we stand in solidarity, Kenwood Oakland Community Organization in Chicago, Coalition for Community Schools, Conscious Concerned Citizens Controlling Community Changes, and Vietnamese American Young Leaders of New Orleans in New Orleans, New Jersey's Parents Unified for Local School Education in Newark, and Journey for Justice member organizations across the country, to shed light on the racial injustice of school closings. Neighborhood schools are the hearts of our communities, and the harm caused by just one school closure is deep and devastating. This is death by a thousand cuts.

We wait with hopefulness for DOJ and OCR to investigate our civil rights complaints so that we can begin the work of rebuilding our communities and using sustainable and community accountable school transformation models to build schools that meet all children's needs.

Respectfully,

Kenwood Oakland Community Organization (*Chicago, IL*), Coalition for Community Schools (*New Orleans, LA*), Conscious Concerned Citizens Controlling Community Changes (*New Orleans, LA*), Vietnamese American Young Leaders of New Orleans (*New Orleans, LA*), New Jersey Parents Unified for Local School Education (*Newark, NJ*), and the national Journey for Justice Alliance



May 13, 2014

VIA MAIL

Eric Holder
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530

Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

VIA EMAIL AND MAIL

Office for Civil Rights,
Chicago Office
U.S. Department of Education
Citigroup Center
500 W. Madison Street,
Suite 1475
Chicago, IL 60661
Email: ocr.chicago@ed.gov

RE: Complaint against Chicago Public Schools under Title IV and Title VI of the Civil Rights Act of 1964

I. INTRODUCTION

This is an administrative civil rights complaint filed with the Educational Opportunities Section of the Department of Justice's Civil Rights Division ("DOJ") and the Office for Civil Rights of the Department of Education ("OCR") under Title IV and Title VI of the Civil Rights Act of 1964 ("Title IV" and "Title VI," respectively) on behalf of African-American students who are enrolled at Dyett High School and Mollison Elementary School, and for all similarly situated African-American students living in the Bronzeville area in the South Side of Chicago who are bearing the harm of racially discriminatory school closings, phase-outs, turnarounds, and consolidations.

1220 L Street, NW • Suite 850 • Washington, DC 20005 • 202.728.9557 • 202.728.9558 *fax*

ap@advancementproject.org • www.advancementproject.org

LA Office: 1910 W. Sunset Boulevard • Suite 500 • Los Angeles, CA 90026 • 213.989.1300 • 213.989.1309 *fax*

School closings, phase-outs, turnarounds, and consolidations have particularly devastating consequences in communities of color that have already been destabilized by divestment, the process of being systematically starved of resources over the course of many years. For the past decade-and-a-half, Chicago Public Schools (“CPS”) has promoted an aggressive policy of closing and privatizing public schools in communities of color. Over the past thirteen years, CPS has closed, phased out, turned around, or consolidated 159 neighborhood public schools and adopted policies that have fostered a proliferation of charter and contract schools in the West and South Sides of Chicago, which are neighborhoods with high concentrations of African-American families and students.

Continuing its policy of dismantling the public school system and harming children of color, in May 2013, CPS closed 49 elementary schools and one high school program, an unprecedented and drastic mass closure. At the time, approximately 40 percent of the children in the Chicago public schools were African American, but African-American children made up 88 percent of those affected by these closings, phase-outs and turnarounds.¹

The Bronzeville neighborhood in the South Side of Chicago, where Dyett High School and Mollison Elementary School are located has disproportionately suffered the devastating consequences of these policies. Bronzeville is a historic African-American community once dubbed the “Black Metropolis” because it was a haven for African Americans migrating from the South through the 1930s and 1940s who, due to restrictive and racially discriminatory housing policies, were denied housing elsewhere in the city. It continues to be heavily populated by African-American families, and is rich with significance for the African-American community. Author Richard Wright, journalist and social activist Ida B. Wells, jazz man Louis Armstrong, and singer Sam Cooke, are just a few of the names that have called Bronzeville home.² Unfortunately, this once vibrant community is being decimated by the obliteration of community assets: neighborhood schools.

¹ See *infra* Figure 3.

² In the 1960s, as restrictive housing covenants were eliminated and downtown competitors opened their businesses to black patrons, Bronzeville saw a period of long economic decline and urban blight. In recent years, however, Bronzeville has received new interest from gentrifiers and developers. Public housing developments have been demolished, destroying those communities, and there have been sweeping foreclosures in the last several years. Recently, Mayor Rahm Emmanuel designated Bronzeville one of seven “opportunity area” neighborhoods. Natalie Moore, “Englewood, Bronzeville wait for mayor’s ‘opportunity’ plan to pay off,” WBEZ91.5 (Aug. 6, 2013), www.wbez.org/news/englewood-bronzeville-wait-mayor%E2%80%99s-%E2%80%98opportunity%E2%80%99-plan-pay-108297.

In the greater Bronzeville neighborhood,³ the small area in the South Side of Chicago demarcated in Figure 1, CPS has closed, phased-out, turned around, or consolidated around 30 public schools in the last twelve years,⁴ disproportionately subjecting countless African-American students in the area to the disruption of school closings. At the end of the 2012-2013 school year, CPS exacerbated harms to African-American children in Bronzeville when it closed Overton Elementary School and designated Mollison Elementary School its receiving school, and it continues to provide little to no additional resources to support the educational experience of the nearly doubled student population. In February 2012, CPS designated Dyett High School for phase-out, and it continues to strangle the school of its resources and its morale.

Complainant asserts that the overcrowding and under-resourcing of Mollison Elementary School, where many students are forced to eat lunch in their classrooms because the school is accommodating close to double the number of students it had last year (from a student enrollment of 237 last year to 505 this year), is racially discriminatory, and constitutes a continuing violation of Title IV and VI. Complainant also asserts that the continued phase-out of Dyett High School, what community members have termed a “slow death” because CPS has continued to make a series of decisions to disinvest in the school and set it school up for failure, where students have no Advancement Placement classes remaining and are forced to take physical education and art classes online, is racially discriminatory, and constitutes a continuing violation of Title IV and Title VI.

Complainant further brings to OCR’s attention that CPS is creating a school desert in Bronzeville, as it will soon become a community with little to no neighborhood schools. Once Dyett High School is phased out, there will be no traditional public high schools in the entire Bronzeville community. CPS is engaging in a pattern and practice of targeting school closings, phase-outs, turnarounds and consolidations in African-American neighborhoods that is racially discriminatory and having a disparate impact on African-American students.

II. COMPLAINANT

Complainant is Kenwood Oakland Community Organization (“KOCO”), a community organization that is a member of Journey for Justice, a national alliance of grassroots community, youth, and parent-led organizations working to resist school closures,

³ In referring to the Bronzeville neighborhood, for purposes of this complaint, Complainant refers to a small area that is roughly contiguous with CPS’s newly designated Network 9. *See infra* Attachment 1.

⁴ *See infra* Figure 1.

privatization, and the dismantling of public schools in communities of color across the country.

KOCO is a community organization based in the South Side of Chicago, dedicated to building the sustained engagement of low-income and working families, developing multi-generational leaders, and improving the quality of life for families in North Kenwood, Oakland, and its adjacent communities. KOCO represents hundreds of members who reside in the greater Bronzeville area, including current and former students and parents of Dyett High School and Mollison Elementary School. KOCO brings this complaint on behalf of those students and parents, and all similarly situated students and parents in the greater Bronzeville community.

III. RESPONDENT

CPS is responsible for the administration and operation of public schools in Chicago, and is a recipient of federal funding.

IV. JURISDICTION

Under Title VI, 42 U.S.C. §§ 2000c *et seq.*, 34 C.F.R. Part 1000, OCR has jurisdiction over discrimination based on race, color, or national origin by institutions that receive federal financial assistance from the Department of Education. CPS is a recipient of federal financial assistance from the Department, providing OCR with jurisdiction over this complaint.

DOJ is responsible for enforcing Title IV, 42 U.S.C. §§ 2000c *et seq.*, which prohibits discrimination in public elementary and secondary schools based on race, color, or national origin, among other bases. DOJ also has jurisdiction over Title VI complaints against recipients of DOJ funds, or upon a referral from the Department of Education.⁵

The discrimination detailed in this complaint is ongoing and constitutes a continuing violation.⁶ While Mollison Elementary School became a receiving school in September 2013 for Overton students displaced by last year's closing, the students at

⁵ U.S. DEP'T OF JUSTICE & U.S. DEP'T OF ED., DEAR COLLEAGUE LETTER ON THE NONDISCRIMINATORY ADMINISTRATION OF SCHOOL DISCIPLINE 1, n.2 (Jan. 8. 2014).

⁶ In May 2012, students of Dyett High School filed a Title VI complaint with OCR challenging the phaseout of Dyett High School. The complaint was administratively closed by OCR, because the closing of Dyett was the subject of a complaint in state court. The case, *Brown v. Chicago Board of Education*, was dismissed on June 28, 2012, on procedural grounds, and the appeal of that decision was dismissed on October 3, 2013. Complainant files this new Title VI complaint regarding Dyett High School now given new facts and the continuing violations of ongoing divestment. Mollison Elementary School, the other school that is the subject of this complaint, was not part of the original complaint regarding Dyett.

Mollison, who are 98 percent African American, suffer the continuing discrimination of attending a school that is overcrowded to a breaking point. CPS administrators have recently made decisions that will keep Mollison under this strain for the next school year. Mollison parents learned at a school budget meeting in April 2014 that because of CPS's budgetary decisions, Mollison will lose a case manager, a classroom teacher, and a reading coach, and a full-time art teacher will be relegated to part-time status. Mollison will also only take in 30 Kindergarteners next year—half the number they served this year—making it likely that Kindergarteners will be separated from older siblings as they enter school next fall. For these reasons and those discussed in further detail in Section V(a), Mollison Elementary School is being set up to fail. Given this intentional failure to invest the resources in Mollison that are needed for it to succeed, it seems that CPS is laying the groundwork for Mollison to be the next school it closes, displacing these students again. This repeating loop of closing schools, displacing students and under-resourcing the receiving school, all of which is being done in a discriminatory fashion, is clearly a continuing violation and must be stopped.

Dyett High School was designated for phase-out in February 2012, and since that decision was announced, Dyett students, who are overwhelmingly African American, continue to attend a school experiencing continued and dramatic disinvestment. As discussed in more detail in Section V(b), while the February 2012 decision to phase-out Dyett was itself discriminatory, the decision to divest that school of resources during the period in which it would continue to be operated is both itself a cognizable act of discrimination and a continuation of the initial discriminatory act. Having decided to phase out Dyett, CPS could have provided, and in fact promised that it would provide, its largely African-American student body with sufficient resources, school staff, and academic programs to ensure they are receiving the education they deserve, but instead it has starved the school of resources, adding further insult and injury to that caused by the initial decision to phase out the school. This practice of disinvestment continues to this day, and this complaint is timely filed.

V. FACTUAL BACKGROUND

Beginning in 2001, CPS has closed, phased-out, turned around or consolidated 159 neighborhood public schools in Chicago. Tens of thousands of students have been directly impacted by these drastic actions, and 87 percent of those affected students have been

African American.⁷ In 2013 alone, CPS closed 49 elementary schools and one high school program, an unprecedented and drastic mass closure. At the time, approximately 40 percent of the children in the Chicago public schools were African American, but African-American children made up 88 percent of those affected.⁸

Schools that serve students of color have been the primary target of CPS school actions – of all affected schools between 2001 and 2013, three out of every four of those schools were intensely segregated African-American schools,⁹ and 89 percent were of schools serving 98 percent students of color or higher.¹⁰

School closings, phase-outs, turnarounds, and consolidations are drastic actions that have devastating consequences. When a school is closed or phased-out, the building is shut down, teachers and school staff members are fired, students are sent to “foreign” schools, relationships between students and educators are destroyed, and the community loses an anchor institution. When students from a closed school are reassigned, the disruption to their education is significant as students lose continuity and must acclimate into a new environment and culture. School staff similarly struggle to accommodate new students, usually without new resources, and to meet the needs of the combined school communities.

School turnarounds are closings by another name. When a school is turned around, usually the entire staff is fired and the building is often turned over to a private management company. In Chicago, an increasing number of turnover schools are privately managed by Academy of Urban School Leadership (“AUSL”). The AUSL turnaround model is based on replacing the school staff—often with younger, whiter, and less-experienced outside teachers and principals, a heavy reliance on high-stakes testing and test prep, and zero tolerance discipline policies. As a result of the combination of these policies and practices, AUSL schools have high teacher turnover rates¹¹ and soaring suspension and expulsion rates. In 2012-13, AUSL schools, which are 73 percent African American and over 87 percent students of color, doled out 52 out-of-school suspensions for every 100 students – this is a rate 3.5 times higher than the rate of traditional public schools in CPS.¹²

⁷ See *infra* Attachment 2.

⁸ See *infra* Figure 3.

⁹ See *infra* Attachment 2. For purposes of this Complaint, Complainant uses the “intensely segregated,” to mean schools serving student populations that are over 90% African American.

¹⁰ *Id.*

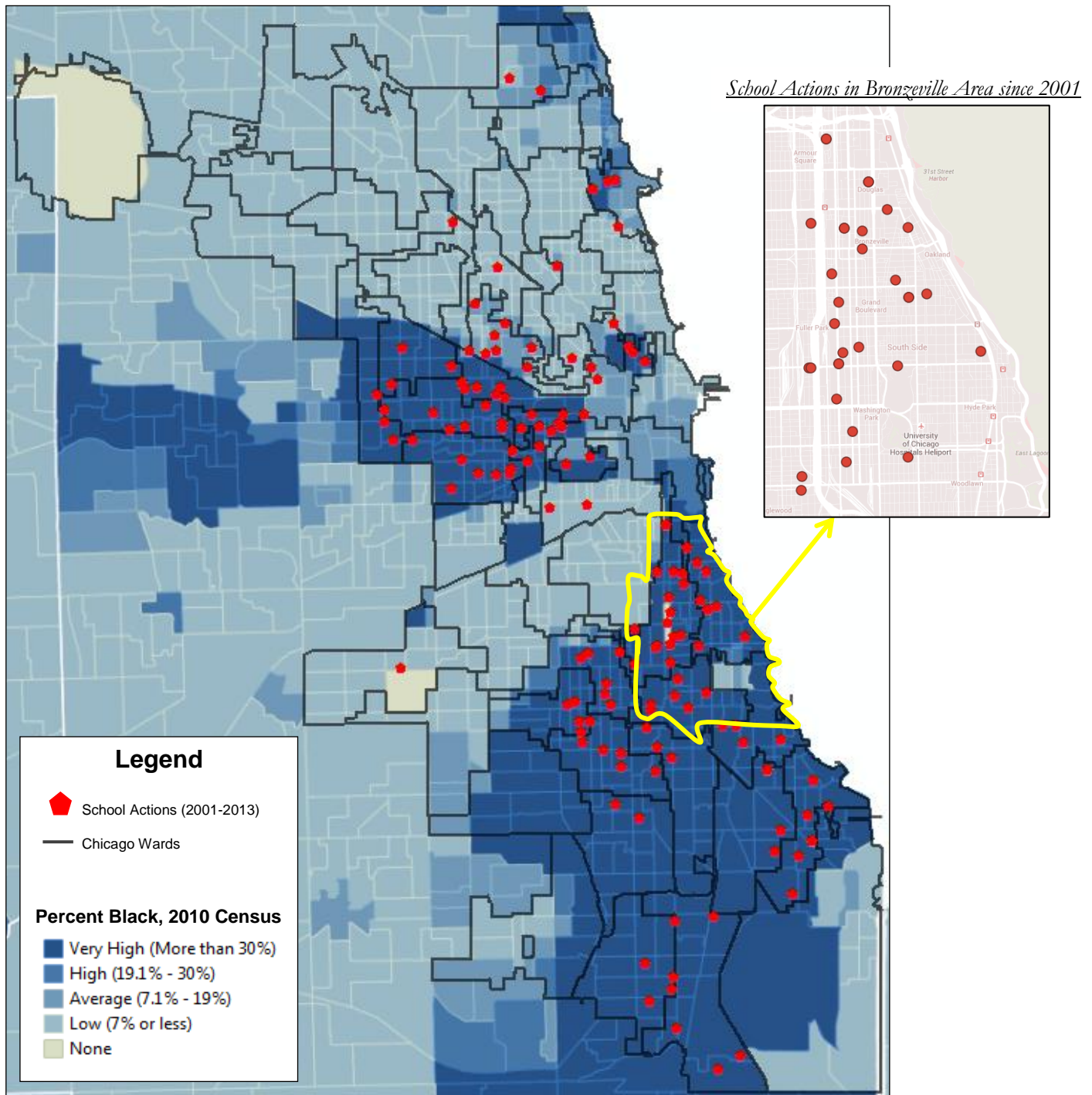
¹¹ A 2012 study on Chicago turnaround schools, many of which were AUSL-managed, found that only 42% of teachers remained teaching at the turnaround school four years later. DESIGNS FOR CHANGE, CHICAGO’S DEMOCRATICALLY-LED ELEMENTARY SCHOOLS FAR OUT-PERFORM CHICAGO’S “TURNAROUND SCHOOLS” 17-19 (Feb. 2012), www.designsforchange.org/democracy_vs_turnarounds.pdf.

¹² Data from Chicago Public Schools.

Closing a school deepens the hardship confronting neighborhoods already suffering from community disinvestment, and as the map in Figure 1 shows, African-American communities have been the primary target of public school closings in Chicago for well over a decade. The Bronzeville area is no exception, where CPS has closed, phased-out, turned around, and consolidated around 30 schools since 2001.

*Figure 1: School Closings, Phase-Outs, Turnarounds, and Consolidations since 2001,
by Black Population*

SOURCES: U.S. Census (2010), Chicago Public Schools, WBEZ.org



During this same period of time, 2001 to the present, CPS has flooded resources into magnets, turnarounds, charters, and selective-enrollment schools, while leaving many traditional public schools in African-American and Latino working class communities languishing with little resources.

For example, the CPS capital budget plan announced at the December 14, 2011 Chicago Board of Education (“the Board”) meeting allocated almost one-fifth of the \$600 million to turnarounds and new charter schools.¹³ It also showed capital improvements being disproportionately made in schools serving a higher proportion of White students than the District average of 8.6 percent: Jones College Prep (a selective enrollment high school with a 30 percent White student population at the time), Bell Elementary (a neighborhood school with a 59.3 percent White student population and a coveted gifted program), and Edison Park Elementary Schools (a neighborhood school with a 49.8 percent White and 15.6 percent low income student population) received \$96 million, \$10 million, and \$15 million respectively for capital improvements.¹⁴

A. Harm Caused by School Closings, Phase-Outs, Turnarounds, and Consolidations

The harm that school closings, phase-outs, turnarounds, and consolidations are disproportionately imposing on African-American students is deep and far-reaching. These dramatic school actions result in intense disruptions in students’ lives. One recent study of African-American and Latino schoolchildren in the year after their school’s closure found declines in academic performances and “added stressors [for] students who were already contending with challenges associated with urban poverty.”¹⁵ Another study based on Chicago schoolchildren found that the disruption of school closings had a negative impact on students’ reading and math achievement the year the closing was announced: students’ scores showed a loss of about one-and-half months of learning in reading and a little more than a half month of learning in math.¹⁶ The study also found that school closures produced

¹³ Chicago Public Schools, *FY 12 Capital Budget Proposal: Presentation to the Board* 16-29 (Dec. 14, 2011), <http://www.cpsboe.org/content/documents/proposedfy12capitalbudgetboardpresentation.pdf>.

¹⁴ *Id.* at 16-17. Data regarding White student population at the three schools in SY 2011-12 available from Chicago Public Schools. See also Noreen S. Ahmed-Ullah, *CPS: Poorer-performing schools less likely to get funds: If a building is unlikely to continue to be a school, district will not invest in it*, Chicago Tribune News (Dec. 15, 2011), http://articles.chicagotribune.com/2011-12-15/news/ct-met-cps-buildings-20111215_1_urban-school-leadership-cps-operating-officer-tim-cawley.

¹⁵ Kirshner, Ben, et. al., *Tracing Transitions: The Effect of High School Closure on Displaced Students* 32 ED. EVAL. & POL. ANAL. 3 (Sept. 2010).

¹⁶ CONSORTIUM ON CHICAGO SCHOOL RESEARCH, *WHEN SCHOOLS CLOSE: EFFECTS ON DISPLACED STUDENTS IN CHICAGO PUBLIC SCHOOLS* 25-26 (Oct. 2009), <http://ccsr.uchicago.edu/sites/default/files/publications/CCSRSchoolClosings-Final.pdf>.

no overall benefit for students, as only a small fraction of students displaced by closures were able to enroll in high-performing schools the following year.¹⁷ Other studies have found that more generally school mobility between the first and eighth grades increases the odds of students dropping out of school during high school, even after controlling for eighth-grade achievement and other factors.¹⁸

When Overton Elementary School was closed at the end of the 2012-13 school year, as one grandparent put it, the overwhelming feeling among the families was that they had closed “the heart of our community.”¹⁹ At Mollison Elementary School, the receiving school which must now educate over 250 more students than it served last year, students are suffering from the continuing discrimination of attending a school where they are “piled on top of each other,” where conflicts and fights are on the rise, and the school community is struggling to survive. Elementary school children who used to be able to walk to Overton from their corner or across the street have spent this year either waiting outside for a school bus during one of the coldest Chicago winters on record, or walking a mile across gang territory. At the beginning of this year at Mollison, which one parent described as “chaos,” 54 kindergarteners were crammed into one classroom in an effort to accommodate the incoming Overton students. Because of the overcrowding, the school is no longer able to provide students with a designated cafeteria, and many students are forced to eat lunch in their classrooms. When students *are* able to eat in a lunchroom, they must first set up and roll out their own tables, because the same room also serves as their gym. The Parent Room, which used to be a regularly-used space at Mollison that made it possible for parents and community to stay engaged in the school, has been closed to make room for more classrooms.

At Dyett High School, where the school is being phased-out, students are suffering from the drawn-out and continuing discrimination of attending a school sentenced to a “slow death.” Countless numbers of students have been pushed out or coached out of Dyett, classrooms and entire hallways have been closed from student use, students no longer have core classes, and, as if in symbolic gesture of discrimination and dehumanization, the front door of the school has been shut and the remaining students must enter and exit every day through the back door. Despite promises CPS made when the phase-out of Dyett was

¹⁷ *Id.*

¹⁸ See Rumberger, Russell W., “Student Mobility and Academic Achievement,” ERIC DIGEST (June 2002).

¹⁹ Interview with Irene Robertson, Grandparent of nine grandchildren at Mollison Elementary School (March 26, 2014).

announced that its remaining classes of students would be supported so that they could graduate without impediments, the 69 students who are left attend a school that has been so drastically divested from and sabotaged that they have a dwindling number of counselors and teachers, online physical education and online art classes, and no Advanced Placement courses.

B. Evidence of Discrimination

Specifically in Bronzeville, CPS has been intent on clearing the entire area of neighborhood-based schools with community governance. It has purposefully provided significant resources to charter growth over the past decade and starved traditional public schools. This policy of closing one neighborhood school after another has disrupted the lives and set back the educational opportunities of African-American children, who make up the overwhelming majority of children and students in the Bronzeville area, and it is a reality that CPS has not imposed on any schools serving majority White student populations.

As Figure 2 shows, the majority of the closings, phase-outs, turnarounds, and consolidations concentrated in the greater Bronzeville area, including Dyett High School and Overton Elementary School, were of schools that served student populations that were over 90 percent African American, and all but one of the schools were schools that had drastically higher percentages of African-American students than the District average at the year of the school action.²⁰

²⁰ Princeton AC Elementary School, which was closed at the end of the 2008-09 school year, is the one exception. However, while the school's student body was only 9.2 percent African-American students, it was 90.1 percent Latino. Latino students made up approximately 40 percent of CPS's district-wide student population during the 2008-09 school year. Data from Chicago Public Schools.

Figure 2: *School Actions in Bronzeville, Percent Students Impacted by Race versus Total Percent African-American Students in CPS in SY of Action*

SOURCES: Chicago Public Schools, WBEZ.org



SY of Action	School Name (at time of action)	Action	Percent White Students Impacted	Percent African-American Students Impacted	Percent African-Americans Students in CPS District-Wide
2001-02	Daniel Hale Williams Elementary School	Closed	0	100	51.3
	Terrell Elementary School	Closed	0	99.5	
2002-03	Donoghue Elementary School	Closed	0	100	50.9
	Zenos Colman Elementary School	Closed	0	99.5	
	Carter G. Woodson North Middle School	Closed	0	98.8	
2003-04	Benjamin W. Raymond Elementary School	Closed	0.4	95.2	50.3
	Doolittle Elementary School	Closed	0.3	99.7	
	Douglas Community Academy School	Closed	0	98.4	
	Benjamin W. Raymond Elementary School	Closed	0.4	95.2	
2004-05	Hartigan Community Arts Specialty School	Closed	0	100	49.8
	Englewood Academy High School	Phaseout	0.5	98	
2005-06	DuSable High School	Closed	1.2	94.2	48.6
	John Farren Elementary School	Consolidated	0	100	
2008-09	Abott Elementary Elementary School	Closed	1.7	88.7	46.1
	Reed Elementary	Phaseout	0	100	
	Princeton AC Elementary School	Closed	0.7	9.2	
2009-10	Helen McCormick Elementary	Closed	0	100	45.1
	Wendell Phillips High School	Turnaround	0.7	98.4	
2011-12	Fuller Elementary School	Turnaround	0	99.6	41.6
	Dyett High School	Phaseout	0	97.2	
	Price Elementary School	Closed	0	95.5	
	Woodson South Elementary	Turnaround	0	97.3	
2012-13	Anthony Overton Elementary School	Closed	0.2	91.9	40.5
	Crispus Attucks Elementary School	Phaseout	0	99.3	
	Williams Multiplex Elementary School	Closed	0.4	98	
	Pershing West Elementary School	Closed	0.8	94.6	
	Mayo Elementary School	Closed	0	92.9	
	Parkman Elementary School	Closed	0	90	
	Carter Elementary School	Turnaround	0	97.7	
	Ross Elementary School	Closed	0.3	99.1	
	Sexton Elementary School	Closed	0	98.6	
	Canter Middle School	Phaseout	1.3	92.1	

These trends are true city-wide. Attachment 2 lists the 159 schools that CPS has closed, phased-out, turned around, and consolidated since 2001. As noted above, three out of every four of those schools were intensely segregated African-American schools, and 89 percent were of schools serving 98 percent students of color or higher.²¹ African-American children make up 88 percent of those who have been affected by these closings, phase-outs, and turnarounds.²²

This is a fate that CPS has not imposed on schools serving majority White student populations. White students make up less than 1 percent of the total number of students impacted by these actions since 2001.²³ In other words, in Chicago's African-American students are 25.8 times more likely to be impacted by school closings and other actions than White students.

During this same period of time, magnets, turnarounds, charters, and selective-enrollment schools have proliferated in the Bronzeville area, draining the community's neighborhood schools of resources, "creaming" or selecting their desired students, pushing out students that are "difficult" to teach, and setting traditional public schools up for failure. One recent study of charter high schools in Chicago found that charters enroll fewer low-income students and significantly under-enroll special needs students, as compared to neighborhood schools, while not improving the overall quality of education for all students.²⁴

Chicago charter schools have also recently come under fire for their use of harsh, punitive discipline policies that contribute to the school-to-prison pipeline. Last year, charter operators on average expelled 61 out of every 10,000 students, compared to 5 out of every 10,000 expelled from district-run schools.²⁵ As noted above, AUSL turnaround schools are no better. In 2012-13, AUSL turnaround schools gave 52 out-of-school suspensions for every 100 students – a suspension rate that is 3.5 times higher than regular CPS Network schools.²⁶

These harsh disciplinary policies impose significant harm on children. Even beyond the well-documented negative consequences of suspensions and exclusionary discipline,

²¹ See *infra* Attachment 2.

²² *Id.*

²³ *Id.*

²⁴ LIZ BROWN & ERIC (RICO) GUTSTEIN, THE CHARTER DIFFERENCE: A COMPARISON OF CHICAGO CHARTER AND NEIGHBORHOOD HIGH SCHOOLS 2-3 (Feb. 2009), <http://ceje.uic.edu/wp-content/uploads/2013/11/CharterDifference.pdf>

²⁵ Noreen S. Ahmed-Ulla, *Chicago's Noble charter school network has tough discipline policy: Critics say too many students are being expelled*, CHICAGO TRIBUNE NEWS (April 7, 2014) http://articles.chicagotribune.com/2014-04-07/news/ct-charter-noble-discipline-met-20140407_1_noble-students-charter-chicago-public-schools

²⁶ Data from Chicago Public Schools.

which include an increased likelihood that a student will drop out of school,²⁷ charter and turnaround schools frequently use harsh discipline policies as a basis for disposing of students they do not want, either because they are “difficult” to teach or because they would have a negative impact on the schools’ high-stakes testing scores. Once pushed out, students face a new round of hardships. They struggle to come back from this substantial disruption in their education, and often have difficulty finding a new school in which to enroll—particularly as neighborhood schools, which are required to welcome and teach *all* students, dwindle in numbers. While these schools try to skew their educational outcomes through admissions and push-out policies and practices that disproportionately harm children of color, they are no better off for their attempted manipulation.

For the neighboring schools who receive the children that charters and privately-managed schools have pushed out, they struggle to welcome and teach these late additions without additional resources. Because per pupil funding is allocated at the start of the school year and does not follow the child once she or he has been pushed out, charter schools get to keep the money without servicing the student, while neighborhood schools struggle to meet the student’s needs. At Mollison, parents noted that five new students joined the already overcrowded Mollison School Community in April, right after spring break and just before high-stakes testing.²⁸

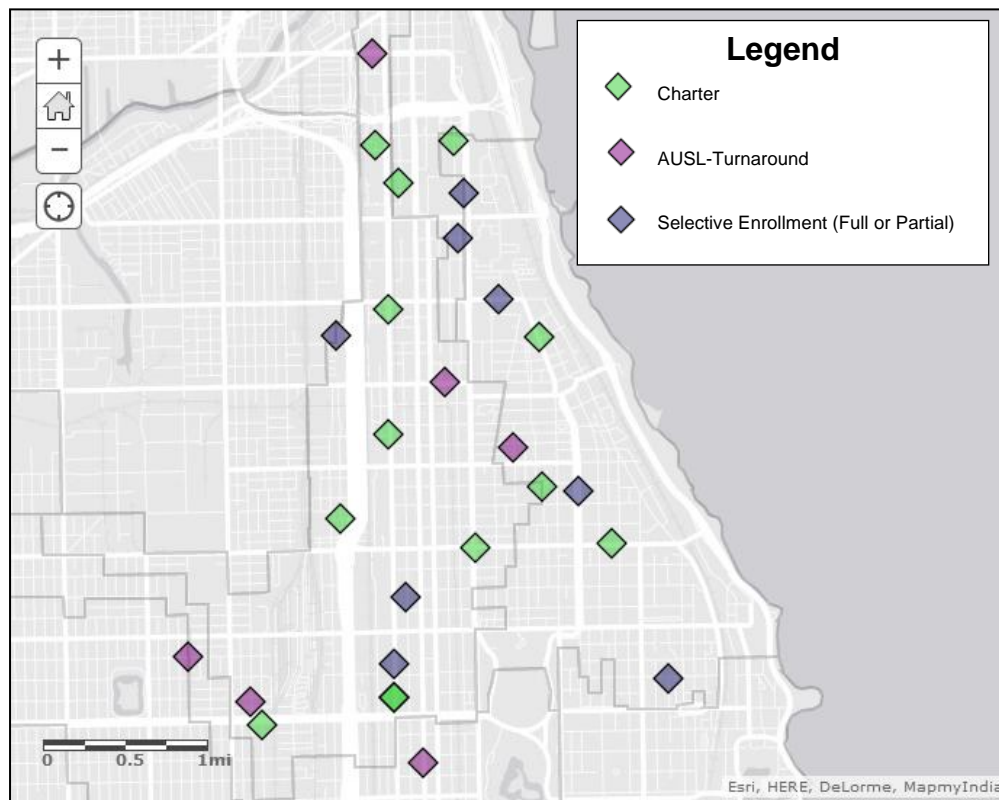
These sobering findings make it all the more alarming to see that the Bronzeville area, as Figure 4 shows, has become overrun by charter and AUSL schools, as well as a number of schools with admissions policies and selective enrollment. It is quickly becoming a school desert with few neighborhood schools remaining.

²⁷ ROBERT BALFANZ ET AL., SENT HOME AND PUT OFF-TRACK: THE ANTECEDENTS, DISPROPORTIONALITIES, AND CONSEQUENCES OF BEING SUSPENDED IN THE NINTH GRADE (Dec. 2012) (Paper prepared for *the Closing the School Discipline Gap: Research to Practice* national conference in Washington, D.C., Jan. 10, 2013) (finding that students who were suspended even one time in ninth grade *doubles* their chance dropping out of school).

²⁸ Interview with Parents of Mollison Elementary School Local School Council (March 25, 2014).

*Figure 4: Map of the Charterization / Privatization of Schools
in Bronzeville Area (2013)*

SOURCE: Chicago Public Schools



i. Mollison Elementary School

The closing of Overton Elementary School, which was over 90 percent African American, at the end of the 2012-13 school year, and the receiving of those students at Mollison Elementary School, which is now 99 percent African American, brought two school communities into a desperate scramble to minimize the drastic and disruptive impact for the sake of their children – what one parent has called “the storm of a lifetime.”²⁹ Both schools were generational elementary schools, where it was not uncommon for the parents and grandparents of the school children to be alumni, and both were anchor institutions in the community.

This school year, Mollison Elementary School is accommodating close to double the number of students it had last year (from a student enrollment of 237 last year to 505 this year), and its elementary schoolchildren are bearing the burden. Parents are reporting a spike in behavior problems, including some that have resulted in school-based arrests, and

²⁹ Interview with Jeanette Taylor, Parent of two children at Mollison Elementary School (March 26, 2014).

fights between students, which are attributed to overcrowding. As described above, students are being crammed into classrooms. The school is no longer able to provide students with a designated cafeteria, and many students are forced to eat lunch in their classrooms. When students are able to eat in a lunchroom, they must first set up and roll out their own tables, because the same room also serves as the gym. The Parent Room, which used to be a regularly-used space at both Mollison that made it possible for parents and community to stay engaged in the school, has been closed to make room for more classrooms.

The stress that the school community is under has made it increasingly difficult to ensure children with special needs are receiving the services they require. Pullout services and test prep are often done in hallways, because there are no longer any quiet spaces in the school. It has also made it impossible for Mollison to meaningfully implement restorative justice and other social and emotional support programs that school staff and the parent community have worked hard for years to build, and which are especially needed now.

ii. Dyett High School

Throughout Dyett's history, CPS has demonstrated a disregard for the neighborhood students in the immediate community that Dyett serves. It has deprived the school of resources, and undermined numerous promising attempts by the community to improve the school.

Dyett High School was converted from a middle school to a high school in 1999, when the Board invested \$24 million into converting King High School, until then a neighborhood school, into a selective enrollment school. The students displaced by the newly created King College Prep High School's test-based admission criteria were moved to Dyett. At the time, the middle school was ill-equipped to serve high school students, and Dyett did not receive any resources to support the transition. On opening day at Dyett High School, there were 7 books in the library and science labs with little equipment, and for the next fifteen years, the Dyett school community would do with a leaking roof, dysfunctional heating, no air conditioning, and inadequate athletic equipment.³⁰

In 2006, when CPS closed Englewood High School, Dyett High School became a receiving school for those students, as well. Again, Dyett received no additional resources

³⁰ COLLABORATIVE FOR EQUITY AND JUSTICE IN EDUCATION (CEJE), COLLEGE OF EDUCATION UNIVERSITY OF ILLINOIS-CHICAGO, DYETT HIGH SCHOOL & THE 3DS OF CHICAGO SCHOOL REFORM: DESTABILIZATION, DISINVESTMENT, DISENFRANCHISEMENT (2013), <http://ceje.uic.edu/wp-content/uploads/2013/11/Fact-Sheet-Dyett1.pdf>

for the influx of new students. Contributing to this churn has been Dyett's revolving door of principals; the school has had four principals in the last decade-and-a-half.³¹

Despite these setbacks and having twice served as a receiving school to closed or changed schools, the Bronzeville community came together to fight for Dyett in a powerful showing of community resilience. Among other efforts, the school community fought for a school library, applied for and won a new school gymnasium through the ESPN *Rise Up* competition, initiated and implemented student leadership programs including Voices of Youth for Chicago Education ("VOYCE") and Bronzeville Global Village Achievers, initiated a career and college prep class called "Life After Dyett," and opened a community garden in collaboration with Washington Park that provided youth summer employment and after-school program at the Dyett-Washington Park Green Youth Farm.³²

By 2008, as a result of community investment and support, Dyett High School had one of the largest increases in students going to college in all of CPS. In 2009, it was also recognized for the largest decrease in student arrests and suspensions, due to implementation of a restorative justice program.³³

But during the 2011-12 school year, successful and crucial programs and personnel were cut from the Dyett school budget, including AVID college preparatory program, restorative justice, *Education to Success* program, a truancy prevention program, Saturday school, a reading program, as well as a guidance counselor and an assistant principal. This left Dyett with just one honors class, no AP classes, and no art teacher.³⁴ This severe disinvestment by CPS signaled the death knell for Dyett.

The next year, the Board voted to phase-out Dyett for poor academic performance, despite much community protest and outrage. At the time of the decision, the neighborhood high school served a student population that was 97.2 percent African American, 97 percent eligible for free and reduced price lunch, and 30 percent homeless.³⁵ Once Dyett is closed permanently, high school students in Bronzeville will only have charter, turnaround, and selective enrollment or partial selective enrollment schools open to them. Bronzeville will be a community with zero neighborhood high schools.

³¹ Interview with Students of Dyett High School (March 26, 2014). See also CEJE, DYETT HIGH SCHOOL & THE 3DS OF CHICAGO SCHOOL REFORM, *supra* note 30.

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ Data from Chicago Public Schools.

Dyett currently serves only 69 students who are 95.7 percent African American, 4.3 percent Other, and 95.2 percent eligible for free and reduced price lunch.³⁶ CPS promised the community that students would receive the resources and support they need to successfully finish their education and graduate from Dyett. But students have watched out the windows of Dyett as the new exercise equipment that they won in the national *ESPN Rise Up* competition was carried in to the brand new gymnasium in the building. Their new gym, like many other classrooms and school spaces, is closed to them. It is small wonder that, left with dwindling resources, no AP classes, and online physical education and art, these students are calling the phase-out a “slow death.”

VI. CLAIMS

A. Disparate Treatment Claim

CPS’s reckless use of school closings, phase-outs, turnarounds, and consolidations are not only harming the students of Dyett, Mollison, and the greater Bronzeville community, which are overwhelmingly African American, they are effectively denying them access to education. As the map in Figure 1 shows, for well over a decade, CPS has subjected Dyett, Mollison, and dozens of other schools serving African-American students in the Bronzeville area to closings, phase-outs, turnarounds, and consolidations that CPS has not imposed on schools serving larger White student populations.

To maintain this un-ignorable pattern and practice of racial targeting, CPS is deliberately and repeatedly setting intensely segregated African-American schools up to fail in order to close neighborhood schools in African-American communities. While Dyett High School has been suffering through the 15 years of sabotage and disinvestment described in Section V(ii), the five Chicago high schools with the highest White student populations—and that currently educate over 90 percent of the 8,756 White high school students enrolled at CPS—have been subjected to no such hardships.

While the remaining Dyett students who are all juniors and seniors have access to no Advanced Placement or honors classes, the students at these five schools have had the luxury of choosing from 16 (Taft High School), 32 (Northside College Prep High School), 21 (Payton College Prep High School), 5 (Chicago Agricultural Science High School), and 26 (Young Magnet High School) AP or IB courses respectively.³⁷ While Dyett students take

³⁶ Data from Chicago Public Schools.

³⁷ Data gathered from each high school’s website.

physical education online, each of these five schools has a state-of-the art gym. None of these White schools have been or are slated to be closed.

As shown in Figure 3, each year since 2001, schools actions impacted a significantly higher percentage of African-American students than the overall percentage of African-American students in the district at the time of the closing.

Figure 3: Percent Students Impacted by School Action by Race versus Total Percent Students in CPS at SY of Action by Race

SOURCES: Chicago Public Schools, WBEZ.org

School Year	Percent White Students Impacted	Total Percent White Students District-Wide	Percent African-American Students Impacted	Total Percent African-American Students District-Wide
2001-2002	0	9.5	99.9	51.3
2002-2003	0.5	9.2	84.4	50.9
2003-2004	0.8	9.1	89.1	50.3
2004-2005	0.2	8.8	99.7	49.8
2005-2006	0.3	8.1	96.5	48.6
2006-2007	0.5	8.1	97.7	47.9
2007-2008	0.5	8.0	97.7	46.5
2008-2009	0.4	8.9	94.4	46.1
2009-2010	0.4	9.2	97.1	45.1
2010-2011	0.8	8.6	68.1	42.6
2011-2012	0.7	8.8	78.9	41.6
2012-2013	0.8	9.0	88.0	40.5

And, as shown in the complete list of school actions in Attachment 2, three out of every four of those schools were schools with African-American student populations greater than 90 percent, and 89 percent were of schools serving 98 percent students of color or higher.³⁸ By comparison, White students have made up less than 1 percent of the tens of thousands of students impacted by CPS's closings since 2001, and only *five* of the schools impacted by these actions have had a population of White students greater than 5 percent.³⁹

CPS has cited under-enrollment and underutilization and poor academic performance as its reasons for closing schools. But these justifications are pretexts. CPS's "utilization rates" are highly manipulatable and can be changed dramatically with just slightly different inputs, such as a revision of an attendance boundary to reduce the number

³⁸ See *infra* Attachment 2.

³⁹ *Id.*

of students assigned to a school.⁴⁰ As the experience of Mollison students, including the 54 Kindergarteners who sat on top of each other for most of the Fall and the children who regularly eat lunch in their classrooms, shows, the justification of underutilization rings false. Further, siphoning off public funding from public schools to create charters to compete with traditional public schools fosters underutilization. To cause the problem and then harm children and communities as a result is disingenuous.

Similarly, CPS's practice of designating schools as low-performing based on high-stakes testing scores accounts neither for the many other factors that contribute to a student's poor test performance nor for other important metrics of learning. Given the alarming growth of charter and privately-managed schools in the same communities that are targeted for closure,⁴¹ labeling schools as academically failing seems little more than an excuse to close neighborhood schools in African-American communities in order to make way for the privatization of public schools serving children of color. Additionally, to close a school based upon inappropriate metrics, transfer students to another school, and then deprive the receiving school of resources it needs to educate all of its students, sets it up for failure. This domino effect of school closure policies and practices deprives children in those schools of an opportunity to learn and succeed, while furthering the desired outcome of privatization of an entire city's school system. These detrimental effects are rolling through communities of color and disproportionately borne by children of color.

In both situations, disrupting students' educational experience, often repeatedly in neighborhoods like Bronzeville, only leads to the kind of further instability and flux that both encourages students to move out or drop out, generating more underenrollment or underutilization, or negatively impacts learning, which continues the cycle of academic "poor performance" by these schools. CPS justifications for closing schools create a self-fulfilling prophecy, used to set up and sabotage neighborhood schools serving African-American students. This is the story of Mollison and Dyett, and the Bronzeville community.

B. Disparate Impact Claim

Even if CPS's use of school closings, phase-outs, turnarounds, and consolidations is not tantamount to intentional discrimination, CPS is still prohibited from engaging in

⁴⁰ CHICAGO TEACHERS UNION, THE BLACK AND WHITE OF EDUCATION IN CHICAGO'S PUBLIC SCHOOLS: CLASS, CHARTERS & CHAOS 13 (Nov. 30, 2012), www.ctunet.com/quest-center/research/black-and-white-of-chicago-education.pdf.

⁴¹ See, e.g., *supra* Figure 4.

policies or practices that have the *effect* of discriminating by race. CPS's school closure practices cannot survive this disparate impact analysis.

As stated above, tens of thousands of students have been directly impacted by these actions, and 87 percent of those affected students have been African-American.⁴² In 2013 alone, CPS closed 49 elementary schools and one high school program, an unprecedented and drastic act. At the time, approximately 40 percent of the children in the Chicago public schools were African American, but African-American children made up 88 percent of those affected by these closings, phase-outs, and turnarounds.⁴³ This is fate that CPS has not imposed on schools serving majority White student populations. White students make up less than 1 percent of the total number of students impacted by these actions since 2001. In other words, in Chicago, African-American students are 25.8 times more likely to be impacted by school closings and other actions than White students.

Schools that serve students of color have been the primary victim of CPS school actions – of all affected schools between 2001 and 2013, three out of every four of those schools were intensely segregated African-American schools, and 89 percent were of schools serving 98 percent students of color or higher.⁴⁴

Children living in the Bronzeville area, including Dyett and Mollison students, have shouldered a disproportionate burden of the closings, phase-outs, turnarounds, and consolidations in Chicago public schools since 2001—approximately 30 of these actions, have been concentrated in Bronzeville. As shown in Figure 2, the percentage of African-American students at all but one of the impacted schools was drastically and disproportionately higher than the CPS district average at the time of the school action.⁴⁵

CPS's school closure practices are unnecessarily disruptive and harmful to the students of Dyett, Mollison, and the rest of the Bronzeville community, the overwhelming majority of whom are African American. School closings are not necessary to further an important educational goal. As discussed in Part VI(a), neither CPS's stated reasons of underenrollment and underutilization, nor academic poor performance can be shown to be necessary to further an important educational goal, and, in fact, as discussed in Part V(a), the weight of the education and social science research shows that school closings cause

⁴² See *infra* Attachment 2.

⁴³ See *supra* Figure 3.

⁴⁴ *Id.*

⁴⁵ As noted above, Princeton AC Elementary School, which was closed at the end of the 2008-09 school year, is the one exception. However, while the school's student body was only 9.2 percent African-American students, it was 90.1 percent Latino. Latino students made up approximately 40 percent of CPS's district-wide student population during the 2008-09 school year. Data from Chicago Public Schools.

educational *harm*. Students from closed schools, as the Mollison Elementary School example shows, rarely end up in schools that provide better school environments or academic performance. Rather, students' experiences at receiving schools are of continued disruption, instability, and inadequate access to resources.

C. Evidence of a Less-Discriminatory, More Educationally-Sound Alternative

Furthermore, there are less discriminatory alternatives to closing, phasing out, turning around, or consolidating neighborhood schools. These include providing the struggling schools with additional resources and supports and implementing sustainable, community-based models for meeting the needs of struggling schools.

The "Sustainable School Transformation" model, which was originally developed by Communities for Excellent Public Schools,⁴⁶ represents a more targeted, community-based, and community-informed method of improving school quality. It requires that school community—including parents, educators, students, and other community members—to conduct a comprehensive needs assessment so that local solutions are tailored to local problems. What is more, versions of this model of school transformation have worked both at the school and district level and shown results.⁴⁷

In the case of Dyett, community organizations like KOCO and others in the Bronzeville community have already shown a deep commitment to investing and sustaining the growth and success of the school. As one example, students, parents, and community members came together to develop a "Dyett Global Leadership and Green Technology Community High School" proposal for school transformation, which it presented to CPS as an alternative to phase-out.⁴⁸

IV. REQUESTS FOR RELIEF

Complainant requests the following remedies:

- a. Reopening of Overton Elementary School as a neighborhood school, beginning in the 2014-15 school year, and providing both Overton and Mollison Elementary Schools

⁴⁶ COMMUNITIES FOR EXCELLENT PUBLIC SCHOOLS, A PROPOSAL FOR SUSTAINABLE SCHOOL TRANSFORMATION (July 2010), www.turnexchange.net/national_turn/archives-news/a-proposal-for-sustainable-school.attachment/attachment/Sustainable%20School%20Transformation%20Proposal_CEPS.pdf.

⁴⁷ See JOURNEY FOR JUSTICE, DEATH BY A THOUSAND CUTS: RACISM, SCHOOL CLOSURES, AND PUBLIC SCHOOL SABOTAGE, VOICES FROM AMERICA'S AFFECTED COMMUNITIES OF COLOR (forthcoming May 2014).

⁴⁸ COALITION TO REVITALIZE DYETT HIGH SCHOOL, DYETT GLOBAL LEADERSHIP AND GREEN TECHNOLOGY COMMUNITY HIGH SCHOOL, *available supra* Attachment 4.

with additional supports and resources to meet the academic, social, and emotional needs of their students.

- b. Removing the threat of “phaseout” from Dyett High School, permitting it to stay open, as a traditional public high school, providing additional supports and resources to meet the academic, social, and emotional needs of the students, and adopting the community-developed “Dyett Global Leadership and Green Technology Community High School” proposal for school transformation. *See*, Attachment 4.
- c. Declaring a city-wide moratorium on school closings, phase-outs, turnarounds, and consolidations.
- d. Requiring CPS to examine the “sustainable school transformation” model, and implement the model as an alternative to closings, turnarounds, and phaseouts.

Complainant, on behalf of current and former students and parents of Dyett High School and Mollison Elementary School, and all similarly situated students in the greater Bronzeville community, respectfully ask that OCR investigate this Complaint, or that it refer this matter to DOJ for joint investigation by DOJ and OCR.

Respectfully submitted on May 13, 2014 by:

KENWOOD OAKLAND COMMUNITY
ORGANIZATION

ADVANCEMENT PROJECT

/s/ J. Brian Malone

/s/ Judith Browne Dianis

Jawanza Brian Malone, Executive Director
Jitu Brown, Education Organizer
Kenwood Oakland Community Organization
4242 S. Cottage Grove Ave
Chicago, IL 60653
T: (773) 548-7500
E: jawanza.bmalone@kocoonline.org
jitu.brown@kocoonline.org

Judith Browne Dianis, Co-Director
James Eichner, Managing Director, Programs
Leah Kang, Staff Attorney
Oscar D. Lopez, Law Fellow (admission pending)
Advancement Project
1220 L Street NW, Suite 850
Washington D.C. 20005
T: (202) 728-9557
F: (202) 728-9558
E: jeichner@advancementproject.org
lkang@advancementproject.org
olopez@advancementproject.org

CC (*via mail*): Anurima Bhargava, Chief
Educational Opportunities Section
U.S. Department of Justice Civil Rights Division
601 D St., NW, Suite 4300
Washington, DC 20004

Catherine Lhamon, Assistant Secretary
Office for Civil Rights
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Jocelyn Samuels, Acting Assistant Attorney General
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Educational Opportunities Section, PHB
Washington, D.C. 20530

Barbara Byrd-Bennett
CEO, Chicago Public Schools
1301 Pennsylvania Ave NW
Washington, D.C. 20004

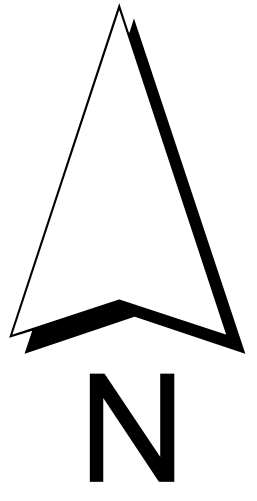
APPENDIX

ATTACHMENT 1	Chicago Public Schools Map of School Network Boundaries
ATTACHMENT 2	Complete List of School Closings and Student Populations by Race (2001-2013)
ATTACHMENT 3	Communities for Excellent Public Schools, A Proposal for Sustainable School Transformation (July 2010) <i>Electronically attached as a separate file.</i>
ATTACHMENT 4	Coalition to Revitalize Dyett High School, Dyett Global Leadership and Green Technology Community High School <i>Electronically attached as a separate file.</i>

Chicago Public Schools

K-12 Networks

Sept. 2013 - June 2014



MAP GUIDE

Schools 2013-2014

District Operated Elementary (non - OS4)

District Operated High School (non - OS4)

OS4 Elementary

OS4 High School

AUSL Elementary

AUSL High School

Charter Elementary

Charter High School

Contract Elementary

Contract High School

ALT/"Options" School
(Includes Charters/Contract & District Operated)

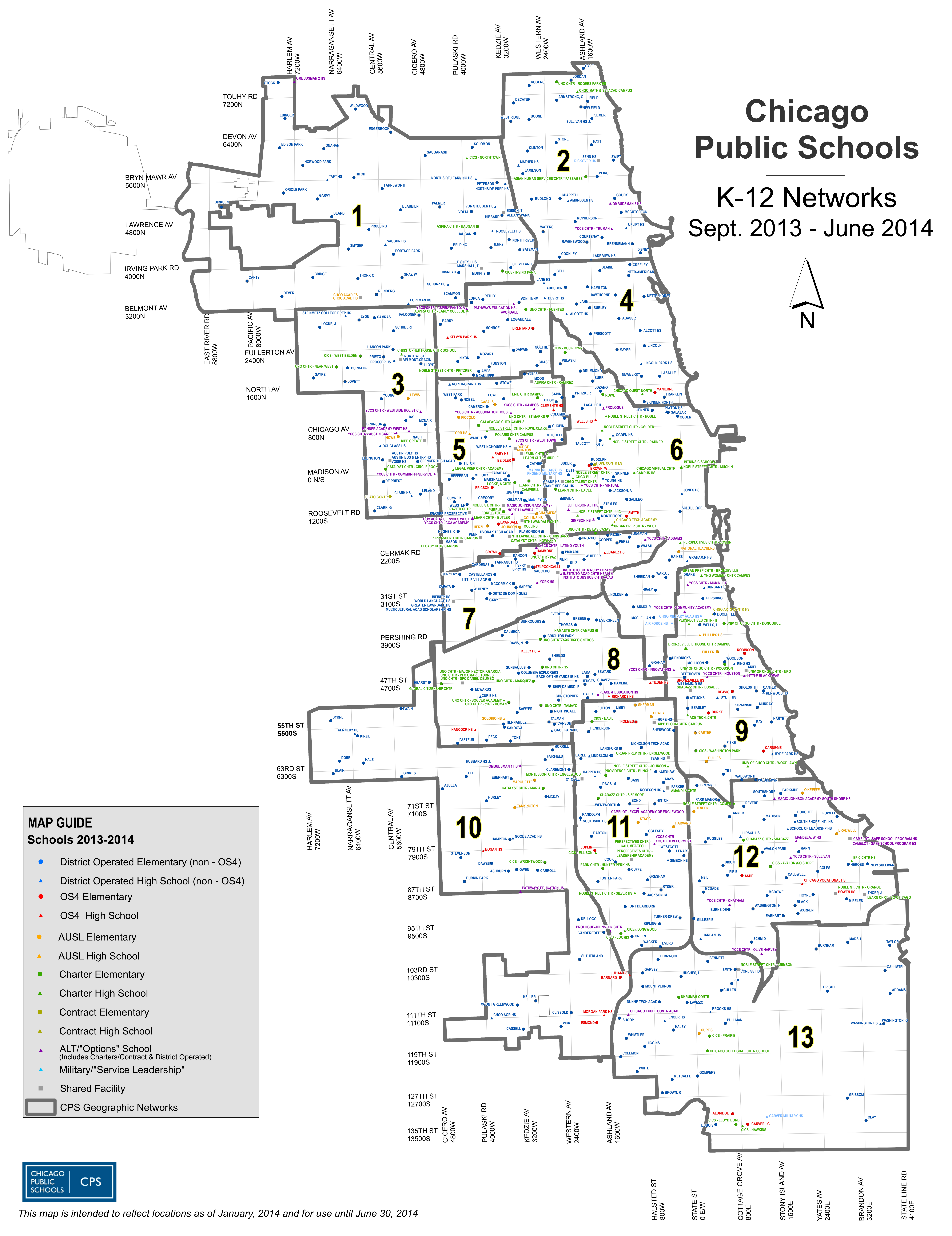
Military/"Service Leadership"

Shared Facility

CPS Geographic Networks



This map is intended to reflect locations as of January, 2014 and for use until June 30, 2014



Complete List of School Closings, Phase-Outs, Turnarounds, and Consolidations by
Student Populations by Race (2001-2013)¹

	SY of Action	School Name (at time of action)	Percent White Students Impacted	Percent African- American Students Impacted	Percent Hispanic Students Impacted	Percent Asian Pacific Islander Students Impacted	Percent African- Americans Students in CPS District- Wide
1	2001 -02	Daniel Hale Williams Elementary	0	100.0			51.3
2		Mary Mapes Dodge Elementary	0	100.0			
3		Mary C. Terrell Elementary	0	99.5			
4	2002 -03	Lucy Flower Career Academy	0	99.4			50.9
5		Nikola Tesla Alternative School	0	99.0			
6		Carter G. Woodson North Middle	0	98.8			
7		Zenos Colman Elementary	0	99.5			
8		Muñoz Marin Primary	1.4	23.7	74.9		
9		The Arts of Living Alternative	3.7	53.3	43.0		
10		George T. Donoghue Elementary	0	100.0			
11	2003 -04	Calumet Academy High	0	99.9			50.3
12		Austin Community Academy High	0.2	99.4			
13		Simmye G. Anderson Community Academy	3.3	53.4	42.7		
14		Benjamin W. Raymond Elementary	0.4	95.2			
15		James R. Doolittle Jr. West	0	99.3			
16		Stephen A. Douglas Community Academy	0	98.4			
17		Hartigan Community Arts Specialty School	0	100.0			
18		Orr Community Academy High	0.4	83.7	15.9		
19		Richard Wright Elementary	0.4	97.7			
20		Richard E. Byrd Community Academy	0	100.0			
21		Sojourner Truth Elementary	0	100.0			
22		Henry Suder Elementary	0	100.0			
23		Jesse Spalding Elementary	1.6	75.6	21.1		
24		Jesse Spalding High	2.0	82.4	15.1		
25		Thomas Jefferson Elementary	0.3	98.3			
26	2004 -05	Englewood Academy High	0	100.0			49.8
27		Ulysses S. Grant Community Academy	0	100.0			
28		Howland School of the Arts	0	99.1			
29		Ralph J. Bunche Elementary	0.7	99.3			
30	2005 -06	Jean Baptiste Point DuSable High	0	100.0			48.6
31		John Farren Elementary	0	100.0			
32		Carver Middle	0.2	99.8			
33		Samuel F. B. Morse Tech Elementary	0	99.8			
34		William T. Sherman Elementary	0.2	99.0			
35		Edward Franklin Frazier Elementary	0	100.0			
36		George W. Collins High	0	99.5			
37		James H Bowen High	0.9	77.7	21.4		
38		Joan F. Arai Middle	3.0	70.8	15.2	11.0	

¹ Student Enrollment Data from Chicago Public Schools. List of school actions collected from WBEZ.org. Linda Lutton, *Mapping 10 years of school closures: A history of school closings in Chicago, 2001 to 2011, and what has become of their buildings*, WBEZ91.15 (Dec. 7, 2011), www.wbez.org/content/mapping-10-years-school-closures; Becky Vevea, *CPS board votes to close 50 schools: Chicago Public Schools plan is the largest scale closing in American history*, WBEZ91.5 (May 22, 2013), www.wbez.org/news/cps-board-votes-close-50-schools-107294.

39		Robert Lindblom College Prep High	0	100.0			
40	2006 -07	John Harvard Elementary	0.4	99.6			47.9
41		George Westinghouse Career Academy High	0	97.5			
42		John V. LeMoyne Elementary	19.7	47.5	21.3	4.9	
43		South Shore Community Academy	0	98.8			
44	2007 -08	Julia Ward Howe Elementary	0	98.3			46.5
45		Midway Academy	3.3	4.4	90.0		
46		Arts, Science & Technology Academy	0.4	85.7	12.5		
47		EXCEL Academy	0	93.5	5.1		
48		Morton Career Academy	0	96.4	1.8		
49		Moses Vines Preparatory Academy	0.2	91.2	6.8		
50		Irving Park Middle	5.6	3.2	86.8		
51		De La Cruz Middle	0	0	95.0		
52		Gladstone Elementary	1.1	74.9	21.3		
53		Robert Fulton Elementary	0	82.6	15.2		
54		Carver Middle	0	99.2			
55		Nicholas Copernicus Elementary	0	97.9			
56		Sir Miles Davis Academy	0.3	98.7			
57		Vernon Johns Middle Academy	0	99.7			
58		William Rainey Harper High	0.2	98.3			
59		Andersen Elementary	5.0	14.1			
60	2008 -09	Abbott Elementary	1.7	88.7	6.1		46.1
61		Davis Developmental	6.9	74.7	18.4		
62		Bethune Elementary	0	99.4			
63		Reed Elementary	0	100.0			
64		Princeton Elementary	0.7	9.2	90.1		
65		Dulles Elementary	0.2	99.8			
66		Schiller Elementary	0.5	99.5			
67		Foundations Elementary	0	100.0			
68		Medill Elementary	0	100.0			
69		Nia Elementary	0	100.0			
70		Johnson Elementary	0	99.3			
71		Lathrop Elementary	0	99.1			
72		Fenger High	0.2	99.4			
73		South Chicago Elementary	0.9	86.4	11.7		
74	2009 -10	Wendell Phillips High	0.8	93.1	5.7		45.1
75		John Marshall High	0.1	99.5			
76		Helen McCorkle Elementary	0	100.0			
77		Charles S. Deneen Elementary	0.4	99.2			
78		George Schneider Elementary	3.5	75.4	20.2		
79		George W. Curtis Elementary	0.2	98.1			
80		Bartholome de las Casas Occupational High	0	92.9	7.1		
81		Myra Bradwell Elementary	0	99.7			
82	2010 -11	Avondale Elementary	2.6	5.0	91.0		42.6
83		Bowen Environmental Studies High	0.5	77.6	21.1		
84		Chicago Discovery High Schools	0.6	62.6	35.8		
85		Global Visions High School	0	91.4			
86		The High School of Entrepreneurship	0	97.8			
87		The High School of Leadership	0	98.5			
88		The High School of Technology	0.3	99.7			
89		The High School of the Arts	0.3	97.8			
90		Best Practice High	0	92.9			
91	2011	Chicago Vocational Career Academy High	0	98.1			41.6

92	-12	Marquette Elementary	1.4	41.8	53.7	
93		Amos Alonzo Stagg Elementary	0	98.5		
94		Guggenheim Elementary	0	96.9		
95		Fuller Elementary	0	99.6		
96		Woodson South Elementary	0	97.3		
97		Pablo Casals Elementary	0.2	50.4		
98		Piccolo Elementary Specialty School	0.4	63.8		
99		Price Elementary	0	95.5		
100		Crane Technical Preparatory High	0.4	96.8		
101		Tilden Career Community Academy High	3.9	71.6	21.7	
102		Herzl Elementary	0.4	97.1		
103		Wendell Smith Elementary	0.3	98.1		
104		Dyett High	0	97.2		
105	2012 -13	Altgeld Elementary	0	98.4		
106		Armstrong L. Elementary	0	96.9		
107		Attucks Elementary	0	99.3		
108		Banneker Elementary	0	98.5		
109		Bethune Elementary	0	98.9		
110		Bontemps Elementary	0	99.7		
111		Buckingham Elementary	0	97.1		
112		Calhoun Elementary	0	99.4		
113		Canter Middle	1.3	92.1		
114		Delano Elementary	0	98.7		
115		Dumas Technical Academy	0	99.1		
116		Duprey Elementary	3.3	29.3	67.4	
117		Emmet Elementary	0	99.1		
118		Fermi Elementary	0	98.7		
119		Garfield Park Elementary	0	97.4		
120		Goldblatt Elementary	0	97.5		
121		Goodlow Elementary	0	95.5		
122		Henson Elementary	0	99.6		
123		Herbert Elementary	0	91.8		
124		Key Elementary	0.3	95.4		
125		King Elementary	0.4	77.1	18.0	
126		Kohn Elementary	0	99.2		
127		Lafayette Elementary	2.3	34.0	61.1	
128		Lawrence Elementary	0	97.7		
129		Marconi Elementary	0	100.0		
130		Mason High School	0	99.4		
131		May Elementary	0	99.4		
132		Mayo Elementary	0	92.9		
133		Morgan Elementary	0	97.0		
134		Near North Elementary	3.3	67.8	27.8	
135		Overton Elementary	0.2	91.9		
136		Owens Elementary	0	98.2		
137		Paderewski Elementary	0.6	80.2	19.2	
138		Parkman Elementary	0	90.0	8.7	
139		Peabody Elementary	0.8	22.2	75.6	
140		Pershing Elementary	0.8	94.6		
141		Pope Elementary	0	89.7	9.8	
142		Ross Elementary	0.3	99.1		
143		Ryerson Elementary	0	97.2		
144		Sexton Elementary	0	98.6		

40.5

145		Songhai Elementary	0.3	95.9			
146		Steward Elementary	2.3	48.8	42.6		
147		Stockton Elementary	8.4	52.6	31.2		
148		Trumbull Elementary	11.1	14.7	56.8		
149		Von Humbolt Elementary	0.6	45.0	49.4		
150		West Pullman Elementary	0	98.3			
151		Williams Middle	0	99.2			
152		Williams Elementary	0.4	98.0			
153		Woods Elementary	0.3	98.4			
154		Yale Elementary	0.5	99.5			
155		Carter Elementary	0	97.7			
156		Chalmers Elementary	0	99.2			
157		Dewey Elementary	0	95.8			
158		Lewis Elementary	1.2	81.9	16.2		
159		O'Keefe Elementary	0	98.1			

TOTAL Percent White Students Impacted	TOTAL Percent African- American Students Impacted
0.6	87.6