



Submitted via electronic mail

Chicago Public Schools District #299
Board of Education
1 North Dearborn, Suite 950
Chicago, Illinois 60602

January 29, 2018

RE: The Impact of Chicago Public Schools District #299's Proposal to Close National Teachers Academy, Open a New High School in the South Loop Community, and Expand the Boundaries for South Loop Elementary School.

To the Chicago Board of Education:

I write to you today on behalf of a team of policy experts, researchers, and local community leaders that have worked over the past three months to review the racial equity impacts of the proposal currently under consideration for Near South community schools. Chicago Public Schools District #299 (CPS) is proposing to close National Teacher's Academy Elementary School (NTA), renovate and re-open the existing building to serve as a new neighborhood high school for the South Loop, and to rezone the school boundaries for National Teachers Academy into a larger South Loop Elementary School (SLES) catchment area.

This report captures the process and recommendations that resulted from the Racial Equity Impact Assessment¹ (REA) conducted by the Equity Committee of independent experts, and three community representatives from each of the most impacted areas of this proposal. In addition to this expert panel's review, Chicago United for Equity (CUE) conducted a simultaneous Racial Equity Impact Assessment town hall with members of the public, which included a separate community dialogue process that also reviewed the proposal and generated recommendations. The report from that public review is provided to you, in addition to this document.

I. EXECUTIVE SUMMARY

This report captures the findings and recommendations of the Equity Committee that conducted an REA on the Chicago Public Schools proposal for Near South area schools. **Using the REA protocol, the Equity Committee identified an inequitable distribution of benefits and burdens of the proposal for students in the impacted communities. The committee also identified gaps in information, and a lack of responsiveness to concerns voiced by members of the affected communities.** The Equity Committee has outlined remedies to address these

¹ Racial Equity Impact Assessment, Racial Equity Assessment, and REA are used in this report to refer to the Government Alliance on Race and Equity's methodology, now adopted by 125 government bodies nationwide, for reviewing public policy and practices with the goal of remedying/mitigating any disparate racial impact and promoting more equitable and inclusive policies that meaningfully serve the needs of constituents.

inequities, and to further the stated goals of the Near South schools proposal set out by CPS in both a more equitable and cost-effective solution. The Equity Committee also proposes an alternative solution that asks that the district give sincere consideration to reimagining Dunbar High School as the new South Loop neighborhood high school. The recommendation allows for several communities in need to be served, while minimizing disruptions to existing communities and existing resources.

II. METHODOLOGY

The REA process consisted of three in-person convenings on November 29, 2017, December 14, 2017, and January 11, 2018.² The participants of the Equity Committee included policy experts, researchers, a CPS representative, and local community members. The policy experts chosen were nominated by and confirmed through a public process conducted by CUE in September, 2017.³

The Equity Committee reviewed the proposal, critically assessed quantitative information, (e.g. data presented by stakeholders, CPS, and community members) and qualitative data (e.g. community testimony and historical context) concerning the rationale and impact of the proposal. The Equity Committee utilized the Government Alliance on Race and Equity (GARE)'s REA framework for its analysis). GARE's protocol centers discussions and considerations explicitly on the implications of racial equity present when making decisions, and intends the tool to be utilized as both a product and a process to develop strategies and actions that reduce racial inequities and improve success for all groups.⁴

The Equity Committee found great utility from grounding their analysis of this proposal in a nationally utilized and recognized tool designed and validated to measure impact on racial equity. The members of the Equity Committee include:

Policy Experts:

- Dr. Amara Enyia, education policy expert and consultant who advised on the Ogden-Jenner merger;⁵
- Ianna Kachoris, an Ogden parent who is a member of the Jenner-Ogden Community

² Attendance Records: The only absences to note were Mariyea Crawford not attending the 2nd or 3rd meeting; Jennifer Rakstad not attending a partial portion of the 2nd meeting; and Ianna Kachoris and Dr. Amara Enyia not attending the last meeting.

³ Members of the public initially nominated and elected Troy LaRaviere, President of the Chicago Principals and Administrators Association, to serve on this committee. After Mr. LaRaviere announced his intentions to seek political office, he chose to step down from this committee to avoid any potential conflicts of interest.

⁴ Racial Equity Toolkit: An Opportunity to Operationalize Equity, Local and Regional Government Alliance on Race & Equity, 4, https://www.racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial_Equity_Toolkit.pdf (2016).

⁵ Ogden International and Jenner Elementary school community members have been seeking the Board's approval to merge a majority African-American student body with a more affluent and diverse student body. Given the seeming similarities in this proposal, a parent leader and consultant hired for that proposal were both engaged in this review.

Steering Committee, and works at the University of Chicago's Office of Civic Engagement;

- Dr. Amanda Lewis, Professor of African-American Studies and Sociology, as well as the Director of UIC's Institute for Research on Race and Public Policy;
- Marisa Novara, Vice President at Metropolitan Planning Council and author of "The Cost of Segregation;"
- Beatriz Ponce de León, Executive Director of Generation All, a citywide initiative working for strong neighborhood high schools in every community; and
- Dr. David Stovall, Professor of Education Policy Studies and African-American Studies at the University of Illinois at Chicago (UIC).

CPS representative:

- Judy Camacho, Director of Strategic Initiatives for Family and Community Engagement at Chicago Public Schools.

Community representatives from areas most impacted:

- Debbie Liu, Community Development Coordinator at the Coalition for a Better Chinese American Community;
- Jennifer Rakstad, Parent representative nominated by the South Loop Elementary Local School Council (LSC) and also a member of the SLES Space Planning Committee; and
- Mariyea Crawford, 8th grade student at National Teachers Academy (NTA), a representative from the Student Action Committee.

III. RACIAL EQUITY ANALYSIS REPORT

The REA process contained 5 sections. The following is a synthesis of the findings:

1. Defining the Proposal and its Intent;
2. Understanding the Performance and Population Data of the Communities Affected;
3. Discussion of Engagement Strategies and Findings;
4. Analysis of Burdens and Benefits; and
5. Recommendations for an Equitable Alternative.⁶

1. Defining the Proposal and its Intent.

At its core, the CPS proposal seeks to propose a “reassigned boundary change”⁷ that would close National Teachers Academy (NTA), a high-performing, well-utilized elementary school that predominantly serves black and low-income students, and convert it into a 1,000-student high school building. CPS officials have stated that the proposal’s primary aim is to

⁶ *Id.* at 6.

⁷ Draft Transition Plan: For the Proposed Reassigned Boundary Change of National Teachers Academy, 1, <http://schoolinfo.cps.edu/SchoolActions/Download.aspx?fid=6311>.

ensure the provision of high-quality neighborhood school options to the Near South community.⁸ Currently, the neighborhood is zoned to two Level 1+ elementary schools and a Level 2 ranked high school, Phillips Academy.

The first component of the proposal closes NTA as an elementary school in order to repurpose it as a high school. CPS asserts this will offer Near South community access to a high quality neighborhood high school.⁹ CPS claims this conversion of NTA from a building intended to serve elementary students to high school students is the “most viable option to quickly bring high-quality neighborhood high school seats to the area.”¹⁰ Its estimated cost is an investment of \$10 million as opposed to the \$75 million to \$100 million cited by CPS to purchase new land and construct a new high school. **The second component of the proposal expands the attendance boundaries for the nearby South Loop Elementary School (SLES) and builds an addition to the current SLES building in order to offer more elementary school seats.**

CPS states that an ancillary benefit to the community will be increased diversity in schools remedying a “historical wrong in the South Loop.”¹¹ This diversity benefit will come as a result of changing the 18th street boundary, which was set in 2005. At that time, the 19th St. boundary resulted in the exclusion of low-income black residents from SLES as wealthier new residents moved into the immediate area surrounding the school. CPS argues that the new proposal now enables black, white, and Asian residents to be educated alongside one another, thus integrating the school community. **CPS’ major intentions for the proposal:**

a. Offering a high-quality neighborhood high school.

For over 40 years, the Chinatown community has advocated for their own neighborhood high school. The growing South Loop population has also begun to call for a high quality, neighborhood high school with guaranteed access for their children.

Currently, the open-enrollment neighborhood high school zoned for the South Loop is Phillips Academy, a Level 2 school. Additional schools in the area are rated a Level 2 or 2+.¹² The area high school with the strongest academic program options and best school quality ratings is Jones College Prep, a selective enrollment high schools for which admission is based on student performance on a selective enrollment exam, 7th grade standardized test scores, and

⁸ Near South area is a combination of South Loop, Chinatown, Armour Square, Bridgeport and North Bronzeville communities; Near South Area School Planning FAQ, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf> (July 10, 2017).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *From PreK to Graduation: Creating a Diverse Neighborhood Continuum for Near South Students*, Inside CPS, <http://blog.cps.edu/2017/08/25/prek-graduation-creating-diverse-neighborhood-continuum-near-south-students/> (Aug. 25, 2017).

¹² Near South Area School Planning FAQ, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf>, Appendix Figure 1-2, (July 10, 2017).

grades.¹³ This information led CPS to conclude that there are very limited high quality neighborhood high school options for South Loop residents. Therefore, CPS proposed repurposing the current NTA building into a high school, potentially adding 1,000 high quality high school seats to the community.¹⁴

b. Creating more diverse schools.

By expanding the boundaries for SLES and moving NTA students to SLES, the school would now be attracting a more diverse community of students.

Currently, high school students in the subset of the Near South attend 127 different high schools across the entire landscape of Chicago,¹⁵ with very few students attending their neighborhood high schools, with the exception of students zoned to Juarez schools. Students who are zoned to Tilden, Phillips or Wells however, attend these neighborhood schools at a much lower rate, (2-3%), than the district average.¹⁶ CPS has determined that by putting forth a new, attractive high-quality neighborhood high school, high school students who currently travel all over the city would stay in the South Loop and attend their new neighborhood high school, thereby creating a more diverse and integrated student body.

2. Understanding the Performance and Population Data of the Communities Affected.

The proposal aims to meet the interests of three separate populations: the NTA community, South Loop community, and Chinatown community.

a. National Teacher's Academy community.

The geographic enrollment boundary of NTA has a racial makeup of 40% or more white, without a racial majority in most of the boundary area.¹⁷ Whereas the student demographics of NTA are 79% low-income students with the school comprised of predominantly (82%) black students; 3% Asian; 7% Hispanic; 5% White; and 3% other.¹⁸

¹³ *Id.*

¹⁴ Near South Side School Planning, Pre-Decisional Version, 14, (June 6, 2017)

¹⁵ Near South Area School Planning FAQ, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf>, 5(July 10, 2017).

¹⁶ *Id.* at 6.

¹⁷ US Census Bureau, Census Block 4, represented in data visualization by Bryan Ricketts. Accessible at: <https://public.tableau.com/profile/bryan7055#!/vizhome/CensusBlockDemographics/Side-By-Side>

¹⁸ Near South Side School Planning, Pre-Decisional Version, 12, (June 6, 2017); *See Appendix 1.*

NTA has done a particularly exceptional job at preparing its most vulnerable students, specifically, low-income black males. Data shows that black boys who attend NTA are learning at a faster rate than their city and statewide counterparts as shown below:¹⁹

- **31%** of low-income black boys in *Illinois* are on grade level for 3rd grade reading;
- **37%** of low-income black boys in the *city of Chicago* are on grade level for 3rd grade reading; and
- **63%** of low-income black boys at NTA are on grade level for 3rd grade reading.²⁰

b. South Loop Elementary School community.

The South Loop geographic attendance boundary includes 29% low-income students. SLES is comprised of 43% black; 13% Asian; 10% Hispanic; 26% white; and 8% other.²¹

Comparing the NTA and SLES school communities.

While both SLES and NTA are Level 1 and 1+ schools,²² there are major differences that exist between the two with respect to their racial and economic make-up.

	<u>SLES</u>	<u>NTA</u>
• Black students served:	42%	82%
• White students served:	27%	6%
• Low-income students served:	23%	77%.²³

There are also significant differences in the two schools’ student achievement data as revealed below on a specific metric, the NWEA,²⁴ a standardized district exam administered to all CPS students.

- **Grade-Level Proficiency Data in Reading:**
 - SLES:
 - 86.2% of 2nd graders are on grade level
 - 83.1% of 8th graders are on grade level

¹⁹ *Solid Achievement by Third Grade is Really Important*, The Annie Casey Foundation, 8, file:///Users/ruparamadurai/Desktop/PZavitkovsky%20-%20Student%20Achievement%20v2.pdf (2012); *See Appendix 2.*

²⁰ *Id.*

²¹ Near South Side School Planning, Pre-Decisional Version, 12, (June 6, 2017); *See Appendix 1.*

²² *Id.* at 11; *See Appendix 3.*

²³ Near South Community Leadership Steering Committee, Meeting 1, http://cps.edu/About_CPS/Policies_and_guidelines/Documents/171010_NearSouth_SteeringCommitteeMeeting_DATAREVIEW.pdf, 33 (October 10, 2017); *See Appendix 4.*

²⁴ The administration of NWEA begins in the 2nd grade, therefore no data is available for pre-K, Kindergarten or 1st grade students.

- NTA
 - 41.1% of 2nd graders are on grade level
 - 65.5% of 8th graders are on grade level²⁵
- **Grade-Level Proficiency Data in Math:**
 - SLES
 - 79.3% of 2nd graders are on grade level
 - 74.6% of 8th graders are on grade level
 - NTA
 - 32.7% of 2nd graders are on grade level
 - 48.3% of 8th graders are on grade level²⁶

Looking at data provided by CPS beyond attainment, both NTA and SLES have data to support that the academic performance of their low-income black student learners is improving. In the area of math, low-income NTA students grew 48.1% and SLES grew 61.0%.²⁷ Looking at how the two schools compared with respect to growing their black students in the area of math, black NTA students grew by 49.2% and black SLES students grew by 62.2%.²⁸

NWEA reading data shows that low-income NTA students grew 63.6 % and low-income SLES grew 59.3%.²⁹ Black NTA students grew by 63.1% and black SLES students grew by 60.3%.³⁰

Generally, the Equity Committee noted that the data shows an important growth trend, similar in both reading and math achievement when comparing SLES students to NTA students. **More specifically, NTA students are coming in academically lower but making significant gains, while SLES students are coming in stronger and maintaining high performance.**

When taken together, the population and performance data reveals NTA’s strength in serving the unique and specific learning needs of black and low-income students, and that there are higher improvements for low-income black students at SLES for math. The Equity Committee was concerned that CPS has not provided data or evidence on school transitions to forecast student success outcomes, so the committee is unclear if the students of NTA would make the same type of gains at SLES as they have achieved at NTA, especially given the larger size of the student population and the fact that SLES is separated into two buildings.

²⁵ Near South Community Leadership Steering Committee, Meeting 1, http://cps.edu/About_CPS/Policies_and_guidelines/Documents/171010_NearSouth_SteeringCommitteeMeeting_DATAREVIEW.pdf, 6 (October 10, 2017); *See Appendix 5.*

²⁶ *Id.* at 12; *See Appendix 6.*

²⁷ *Id.* at 28; *See Appendix 7.*

²⁸ *Id.* at 26; *See Appendix 8.*

²⁹ *Id.* at 22; *See Appendix 9.*

³⁰ *Id.* at 20; *See Appendix 10.*

c. Greater Chinatown community.

While historically, the Armour Square and Bridgeport neighborhoods were predominantly Irish and Italian, in the past few decades, these two neighborhoods along with McKinley Park, Brighton Park, Douglas and South Loop have all merged into what is now “Greater Chinatown,” with census data revealing that the population is majority Asian, and more specifically Chinese.³¹ In addition, a sizable Hispanic demographic resides in this community as well.³² This community has become a port of entry for many new immigrants who are typically low-income and have Limited English Proficiency.³³

Currently, there are numerous high performing (level 1 and 1+) elementary schools in this region. The area is zoned primarily to Tilden and Phillips, both Level 2 schools.³⁴ Many students from the area attend Kelly High School, which has revamped its programming in recent years to offer bilingual education for both native Spanish and native Mandarin speakers, despite it being a Level 2+ school.³⁵ A review of 2015-2016 graduation data, found that students from this community are going to 47 different high schools, with approximately 30% going to selective enrollment schools.³⁶ Performance level data, on the same metric as noted for SLES and NTA above, (the NWEA), demonstrates that this community of students is academically high performing.³⁷

The broader Chinatown and South Loop communities have made clear that they are dissatisfied with the high school options currently available to them and would prefer to have guaranteed seats in a high performing high school nearby. What is not clear is whether the curricular and programming options in the proposed new South Loop high school will match the priorities of Chinatown residents or if the new high school boundaries will include everyone who hopes to be included.

Overall, each of these communities in the greater Chinatown and South Loop area is made up of different types of students with different needs, and while the Equity Committee can appreciate the difficulty in balancing the needs of each, the current proposal as it stands, has a goal of ensuring “high quality seats” for the entire South Loop community, which in reality benefits some at the expense of others.

³¹ Liu, Debbie, *Chinatown – High School Need*, Coalition for a Better Chinese Community, 2 (December 14, 2017).

³² *Id.* at 5.

³³ *Id.*

³⁴ *Id.* at 3.

³⁵ Near South Community Leadership Steering Committee, Meeting 1, http://cps.edu/About_CPS/Policies_and_guidelines/Documents/171010_NearSouth_SteeringCommitteeMeeting_DATAREVIEW.pdf, 49-50 (October 10, 2017); Liu, Debbie, *Chinatown – High School Need*, Coalition for a Better Chinese Community, 8 (December 14, 2017).

³⁶ Liu, Debbie, *Chinatown – High School Need*, Coalition for a Better Chinese Community, 6 (December 14, 2017).

³⁷ Near South Community Leadership Steering Committee, Meeting 1, http://cps.edu/About_CPS/Policies_and_guidelines/Documents/171010_NearSouth_SteeringCommitteeMeeting_DATAREVIEW.pdf, 6, 12 (October 10, 2017)

3. Discussion of Engagement Strategies and Findings.

In the two years leading up to the roll out of the proposal, CPS engaged some stakeholder groups to get their feedback on the initial plan and its design. It is unclear which stakeholder groups were engaged in the process prior to May 2017, but what is notable is that the NTA community was not part of the development process.³⁸

In the spring of 2017, the process quickly escalated into the formulation of the proposal at issue, without CPS casting a wider net of stakeholders with vested interests in the community to help craft the proposal. In May of 2017, CPS announced the NTA boundary change, and within the next month, announced its interest in turning NTA into a high school.³⁹

After introducing the proposal, CPS engaged in community engagement, by conducting more than 25 small group meetings with various stakeholders in the Near South and collecting over 900 e-mails from various parents and community members. Based on the feedback and dialogue from these meetings, CPS did not substantially change its stance on the proposal to move forward with the closure, but rather slowed the implementation of the plan in efforts to “better serve the community.”⁴⁰

Additionally, over the course of the summer, CPS held three town hall meetings on June 6, June 20, and July 10, where the FAQ document and transition plans were made available to attendees.

After revealing the plan publicly, CPS convened “steering committee meetings.” CPS formed this committee in October of 2017 with the goal of developing recommendations to CPS leadership on details of the proposal in the planning process.⁴¹ The steering committee is comprised of approximately 22 members who represented the following interests: CPS, Academy for Urban School Leadership, NTA, SLES, Hilliard Homes, Drake, Coalition for a Better Chinese American Community, Near South Planning Board, St. Therese, Healy, True Rock, Pui Tak Center, and Greater South Loop Association.⁴²

The communities most negatively affected by the proposal are those groups not represented in the formulation process. These were voices not engaged, sought out, or told that their communities were going to be forever changed by the decisions of those at the district. These include the community and students currently attending other under-enrolled South Loop

³⁸ Draft Transition Plan For the Proposed Reassigned Boundary Change of National Teachers Academy; 1 <http://schoolinfo.cps.edu/SchoolActions/Download.aspx?fid=6311>

³⁹ Draft Transition Plan For the Proposed Reassigned Boundary Change of National Teachers Academy; 1 <http://schoolinfo.cps.edu/SchoolActions/Download.aspx?fid=6311>

⁴⁰ Draft Transition Plan For the Proposed Reassigned Boundary Change of National Teachers Academy; 1 <http://schoolinfo.cps.edu/SchoolActions/Download.aspx?fid=6311>

⁴¹ *Id.*

⁴² *Id.*

high schools, elementary students facing longer commute times, and NTA parents and students; all of these groups are primarily low-income, black residents.

Overall, the NTA community has been affected by a lack of engagement and transparency from the development stages of the proposal, and numerous communities have missed the opportunity to be engaged with one another in order to identify and align their interests and agendas. For these communities, CPS should have instituted a more systematic approach and opportunity to create communication between the different community groups. Ultimately, more communities could have benefitted had the engagement process been inclusive, meaningful, or equitable for *all* those affected.

4. Analysis of Burdens and Benefits.

The intention of the proposal is to illuminate any benefits as well as address long-standing problems for the communities. Despite this intention, the reality is that there are also significant burdens that will fall disproportionately on specific communities. It is critical to understand who bears what burdens and who receives the benefits, when determining the long-term impact of this proposal.

a. Closure of NTA.

An essential element of the current proposal is the eventual closure of NTA as a neighborhood school. This closure would allow CPS to repurpose the building into a neighborhood high school that would primarily serve the South Loop and existing NTA community. With the gradual closure of NTA, CPS will allow NTA students in grades 2-7 to finish out their education at NTA. Kindergarten and first grade students currently at NTA would be offered seats at the new SLES when it opens in the fall of 2019.⁴³

Benefits.

According to CPS, closing NTA offers the most viable option to quickly bring high-quality neighborhood seats to the area while establishing a continuum of high quality options for families from Pre-K through 12th grade. Should the new high school prove to be a better neighborhood option than those currently accessible to the Near South community, CPS will have created stronger high school access for a community in need.

Burdens.

The closure of NTA directly burdens the current low-income, black students of NTA who are thriving academically and socioemotionally. Should this community be displaced to another setting, current NTA students would not only have to acclimate to a larger school with an

⁴³ *From PreK to Graduation: Creating a Diverse Neighborhood Continuum for Near South Students*, <http://blog.cps.edu/2017/08/25/prek-graduation-creating-diverse-neighborhood-continuum-near-south-students/> (Aug. 25, 2017).

entirely different student body, but also adjust to new teachers and curriculum that are not focused or resourced to meet the unique learning needs of the specific student population. These students will also have to adjust to new structures and philosophies of learning that are embedded in the SLES curriculum. There is no evidence to support or guarantee that if these students are disrupted and moved out of their current learning environment, their current success and academic progress will be replicated or grow substantially.

Additionally, the closure burdens future generations of low-income black students who will have fewer high quality elementary school options citywide that have demonstrated such a record of success with their demographic of learners.

Additional factors that may interfere with students' progress include coping with displacement and disruption of their school community and a lack of continuity in housing, transportation, and childcare. An increase in mobility rates for low-income families, especially those being displaced / priced-out of their current community, can potentially impact these students' academic abilities.

Community trust is another factor for consideration. The lack of meaningful engagement, lack of transparency, and shifting analysis on the part of CPS created mistrust of those in charge of the city, and school administration. This feeling is likely to deepen if the CPS proposal is implemented. Members of the communities affected have publicly testified that they believe officials are not concerned about different interests and needs of some of the most vulnerable members of their community. This lack of trust between community and government leaders could have a significant impact on the way in which this community engages in future decision making.

The proposal also stands to burden current staff and personnel at NTA and could lead to an inequitable workforce.⁴⁴ It has not been made clear what will happen to current staff or personnel at NTA, and whether they will be guaranteed a job at the new SLES or how long they will be able to stay employed at NTA. While, there was no information made available to the Equity Committee about the racial make-up of the staffs of these two schools, we are also concerned there is a lack of attention to the need for equitable hiring practices in both the new expanded elementary school and the high school.

Finally, some elementary students, namely those from NTA, may face increased commute times with no transportation options. While CPS' proposal sought out feedback from families with respect to transportation,⁴⁵ and continues to do so, the proposal does not specifically address community concerns around lengthened commute times for elementary students, nor does it propose sound alternative transportation options that address increased commute times.

⁴⁴ A workforce that represents the community demographics of Chicago or the surrounding neighborhoods.

⁴⁵ *From PreK to Graduation: Creating a Diverse Neighborhood Continuum for Near South Students*, <http://blog.cps.edu/2017/08/25/prek-graduation-creating-diverse-neighborhood-continuum-near-south-students/> (Aug. 25, 2017).

Throughout the ongoing public dialogue and across affected communities, there is a strong consensus that NTA is doing a very good job of supporting the academic needs of a historically marginalized group of students. Closing this school would disrupt and dismantle an institution that has a quantitative record of success with its students. Moreover, the proposed alternative offers no guarantees or meaningful strategy aimed at maintaining or growing this success. Instead, CPS would be disrupting a powerful, effective and unique academic environment at NTA.

b. Creating a brand new neighborhood high school.

Another essential component of the proposal is the creation of a brand new neighborhood high school. According to CPS, the high school offers an opportunity to create a higher quality neighborhood school option than what currently exists. The new high school would have the capacity to serve approximately 1000 students, theoretically 250 students in each high school grade level, and is intended for students across the communities included in the attendance boundaries.

Benefits.

The South Loop community could benefit from this new facility if it is in fact, a “high quality school” as promised by the proposal. Then, residents of this community currently sending their students to high school either out of their attendance areas or who are attending the neighborhood Level 2 and 2+ schools, would have a stronger academic option to keep students locally. This could significantly decrease commute times for a lot of high school aged students in this community.

There is also significant benefit for the Greater Chinatown community. For years, the Chinatown community has advocated for greater access to high school options intended to serve their communities’ needs.⁴⁶ The new high school is expected to address some of the needs of students from the Greater Chinatown community, namely access to a potentially higher quality school than is currently available in existing neighborhood schools in the community. However, specific community needs that have not been addressed include a robust English learner program, STEAM classes and adult programming. For instance, transitional bilingual services can only be provided within this new high school if the threshold requirement of 20 students is met. It is unclear if these needs would be met within the new high school.

Another subset of students that could benefit from the proposal would be high school students in the Near South area, who now attend approximately 127 different high schools across

⁴⁶CMAP: Chinatown Community Vision Plan Executive Summary, http://www.cmap.illinois.gov/documents/10180/59632/Chinatown_Executive_Summary_English_LOW_RES.pdf/938224a9-ebe9-4154-b802-525316eda9a1, 17 (December 2014).

the city, with only 8% of these students attending their neighborhood high school.⁴⁷ The proposal has the ability to lessen commute times for a significant percentage of these students, should they choose to attend the new high school at NTA.

As a final note, the district as a whole benefits from this proposal, given that for households that have options, if they would otherwise be in a situation where their child couldn't get into selective enrollment school, their choice could have been to leave CPS and the city all together. However, the creation of an alternative option allows for CPS to keep this population within the city and the school system.

Burdens.

Neighboring high schools, specifically Phillips and Dunbar, would be burdened by the CPS proposal. With the creation of a brand new high school in the community, the new structure will likely limit their ability to increase their enrollment or enroll a more diverse student body. Currently, Phillips only enrolls 3% of eligible students from the zoned attendance area. Building a new high school cuts into Phillips' existing boundary and would mean that future expansion would be almost impossible. Also, the school would be zoned to only the majority-black neighborhoods creating a structural barrier to any opportunity to diversify through the geographic attendance boundary.

Negative messaging about their schools and their viability presents another set of challenges for existing high schools. CPS' framing of the new high school as a *better* academic option than what is currently available in schools like Phillips, Tilden and Wells (which are all significantly under-enrolled) could lead to a further decline in enrollment at these schools and continuing unwillingness to invest in the potential of these schools to grow.⁴⁸ Continued unwillingness to invest undervalues the school, the staff, and the students. It is unclear whether any of the local high schools, or their respective administrations were engaged in the development of CPS' proposal, yet with a new high school taking from their existing boundaries, these neighboring schools could face stagnant or decreased enrollment as students may be drawn away from these schools. Due to the student-based budgeting formula, this means that these schools will face associated decreases in investment. This could destabilize the communities around those schools, damaging the value and perception of quality in those schools.

Residents living in affordable housing near NTA may also be burdened as a result of the opening of a new high school. Given that the proposal involves the redesign of an existing school facility (NTA) and the construction of additions to another (SLES), both are financial investments that may impact a school's capacity to serve new households that may come into the community. More specifically, a new high-quality high school could be used to attract new

⁴⁷ *From PreK to Graduation: Creating a Diverse Neighborhood Continuum for Near South Students*, <http://blog.cps.edu/2017/08/25/prek-graduation-creating-diverse-neighborhood-continuum-near-south-students/> (Aug. 25, 2017).

⁴⁸ Near South Area School Planning FAQ, Appendix Figure 2, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf> (July 10, 2017).

higher-income residents, increasing demand for higher-priced housing and effectively pricing out / displacing lower-income residents from the Near South community area.⁴⁹

c. Expansion of SLES campus.

The proposal seeks to take the current SLES campus and provide an addition, a new facility, aimed at serving the Near South students. The proposal maintains the existing South Loop buildings, but the elementary school will now become a three-campus elementary school model, in which each building will hold different grade levels. With this expansion, the South Loop boundary expands to 22nd street. This aspect of the proposal will add approximately 1200 elementary school seats to the South Loop area. Also, by combining current facilities, SLES and the South Loop Early Childhood Center will allow for a capacity of approximately 1800 elementary school students.⁵⁰

Benefits.

The South Loop community benefits from this proposal because the new campus increases the capacity of SLES to serve the growing elementary community. More specifically, the proposal adds approximately 1200 new elementary school seats to offset the 840 elementary seats lost in the NTA conversion, adding a net increase of 360 elementary school seats for the neighborhood.⁵¹

Additionally, current and future SLES students benefit from this plan by receiving more funding and resources dedicated to expanding and improving the physical capacity of the current SLES facility with a \$63 million allotment provided for the development of an annex to the current SLES facility.

Burdens.

Those burdened by this proposal are the black, low-income students now being rezoned to attend SLES. Research supports that transitioning to a new school after enduring a school closure, has a negative effect on students.⁵² In this case, there may be a significant number of students who do fare well in the new configuration of the three buildings to be in place at SLES. However, provoking factors could be the large school size, breaking up siblings across multiple buildings, increased commute times, logistical obstacles in getting multiple children to multiple campuses in relatively short periods of time, and a lack of continuity in culture and climate

⁴⁹ Gallagher, Megan and Reed, Jordan, *Does School Choice Affect Gentrification? Posing the Question and Assessing the Evidence*, Urban Institute, 7 <https://www.urban.org/sites/default/files/publication/65841/2000374-Does-School-Choice-Affect-Gentrification.pdf> (August 2015).

⁵⁰ Near South Side School Planning, Pre-Decisional Version, 4, (June 6, 2017).

⁵¹ Near South Area School Planning FAQ, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf>, 9 (July 10, 2017).

⁵² Research Report: School Closings in Chicago, Understanding Families' Choices and Constraints for New School Enrollment, The University of Chicago Consortium on Chicago School Research, 17, Table 1, <https://consortium.uchicago.edu/sites/default/files/publications/School%20Closings%20Report.pdf>, (January 2015).

across all three buildings. While some outcomes are speculative, it is clear that there is no guarantee that SLES can and will serve the students of NTA as well as they are being served at their current school. Also, CPS has provided insufficient information on the logistics of the consolidation and what additional supports will be put in place to ensure seamless transition for NTA students.

d. More Diversity at South Loop Elementary School and in the new High School.

Benefits

Schools such as SLES and the new high school receive the direct benefit of becoming more racially and socioeconomically integrated schools. “Research shows that racial and socioeconomic diversity in the classroom can provide students with a range of cognitive and social benefits.”⁵³ With this general concept in mind, CPS believes the Near South community will be home to a set of high quality neighborhood school options from pre-K to high school allowing students from numerous different backgrounds to be served in schools together.⁵⁴

Burdens

While the intent is to create more diversified schools that bolster student learning, the manner in which this is being done risks segregating other students in the process. By integrating certain communities such as SLES, the proposal simultaneously furthers the segregation, and burdens of already segregated, vulnerable, low-income communities of black students. This is not *equitable* “integration” as CPS frames it, when some communities benefit, at the cost of others.

While all of the benefits and burdens listed above may not be the explicit, intended outcomes of developers and supporters of the proposal, the stated actions in the proposal will clash with historical and structural inequalities that disproportionately impact vulnerable communities. Effectively assessing the burdens and benefits requires an understanding of root causes, historical context, and institutional and structural barriers. This Equity Committee believes the following factors should be considered to fully understand potential impact:

- **Racialized segregation by way of public policy.** The last 100 years of urban planning, education, and housing policy in the city of Chicago, as well as at the federal level, has deliberately worked to segregate communities based on race.
- **Creating inequitable segregation.** CPS’ claim that an ancillary benefit of the proposal is the promotion of “integration” of the South Loop community. Defining integration as the ability to place a multitude of ethnicities together may be integration, but is not *equitable*

⁵³ The Benefits of Socioeconomically and Racially Integrated Schools an Classrooms, The Century Foundation, <https://tcf.org/content/facts/the-benefits-of-socioeconomically-and-racially-integrated-schools-and-classrooms/>

⁵⁴ *From PreK to Graduation: Creating a Diverse Neighborhood Continuum for Near South Students*, <http://blog.cps.edu/2017/08/25/prek-graduation-creating-diverse-neighborhood-continuum-near-south-students/> (Aug. 25, 2017).

considering communities are benefitting, (getting a valuable education with more funding and resources directed at them and their growth), at the cost of furthering the burden of others, specifically, an already vulnerable and historically disposable population, specifically, low-income black students. It is these students that are stigmatized, displaced, or forced to shift schools, potentially to lower quality ones. This exacerbates inequality and substandard educational experiences and outcomes.

- **Pitting communities against one another.** The way the city’s high schools are set up, encourages students to travel all over the city to attend high school and promotes this idea of school choice. At its core, school choice makes schools compete for students and makes students compete to get into schools, which in turn, pits communities against each other around the constellations of competing needs.
- **Racism.** This takes form in two different ways, and against two different populations affected by this proposal.
 - **Disrespect and disposability of low-income black families.** Policymakers have historically shown a lack of respect for low-income, black communities, and decisions made have rendered these communities disposable. There is a complete disregard for these communities being able to support a thriving school, so the city is willing to dismantle not only the school itself, but also the community around it. Ultimately, this disrespect and view of disposability of this community tells them that there are others that need this space more, or are more deserving of this space than them.
 - **Ignoring the historical needs of the Chinatown community.** By dismissing the needs of the Chinatown community for over 40 years, city officials have signaled that they are not a priority when planning for education in Chicago. While the proposal is intended to be a solution to this community, it is imperfect at best.

5. Recommendations for an Equitable Alternative.

The current proposal fuels inequitable outcomes primarily because it entails the loss of a high-performing school that specifically support students of color learning, growing, and improving their school and community. The Equity Committee finds that the closure of NTA would set numerous precedents that will have a long-standing impact on an already historically disenfranchised community of students. Dismantling the NTA school community undercuts any meaningful efforts toward integration, as the move effectively sends harmful messages to communities, including:⁵⁵

- No school is safe and *any school* can be dismantled and become collateral damage regardless of performance;
- A majority black school, regardless of its success and growth, is inherently undesirable and disposable;
- Low-income students of color in a high-performing school can lose that school in the name of integration, even when that integration is inequitable;

⁵⁵ The following messages were community testimony about the effect of the closure of NTA, and were provided as data for our assessment.

- The needs and interest of low-income, black students are less important than the needs and interest of more powerful, affluent residents; and
- Existing high schools in the community are invariably low quality and not worthy of investment, and the students they serve are not also entitled to good schools.

Based on the pervasive impact the above messaging will have, the Equity Committee strongly urges that CPS reconsider the proposal in its entirety and instead, meaningfully explore existing structures within the community. The Committee strongly requests that the district give sincere consideration to Dunbar High School as a viable alternative.

Currently, Dunbar is at 28% utilization with respect to enrollment, (having a capacity of 2,016 available seats and an alarming 1,455 of those seats currently vacant).⁵⁶Dunbar is geographically close enough to SLES that students and families testified at Equity Committee meetings that the facility is already a “part of the community.” The school is easier to get to than Phillips or Tilden, for example, with respect to the proximity of public transportation options available to students, and has a thriving Career and Technical Education (CTE) program that can be further developed. Additionally, the school already maintains a framework to build a STEAM program. Its location proximate to the Illinois Institute of Technology could also allow for further partnerships and collaboration to build out a viable plan.

In the course of exploring this option, the Equity Committee recommends that the district carefully and meaningfully craft an inclusive process. The process should not only be responsive to the needs of the communities at hand (NTA, SLES, and Chinatown), but also maintain the current integrity of the Dunbar school community. The process must be attentive to the needs of current Dunbar students and ensure they do not get pushed out as a result of this recommendation. This will require the district to undertake a radically different approach than what has currently been implemented, and instead engage trusted outside consultants and resources that can support the equitable inclusion of the many interested parties involved. If executed thoughtfully, the resulting proposal would allow for a myriad of populations to be served, and in a manner that is less disruptive and more racially equitable to all affected students and communities.

This proposal would also need to recognize that the Chinatown community sees the current plan as a quasi-solution for issues that they have historically raised. By considering this new recommendation, members of the Chinatown community may feel that CPS has reneged on their promise to provide a meaningful solution. However, that is not the intention. The Equity Committee strongly states that it is imperative that the Chinatown community not be ignored, and instead acknowledged and honored for its long-standing advocacy. Their needs should be as central to the discussion as the needs of the NTA and SLES school community. It is essential that the Chinatown community is included in the redevelopment and reimagining of what Dunbar can be for their students as well.

⁵⁶ Near South Area School Planning FAQ, <http://blog.cps.edu/wp-content/uploads/2017/06/170710-NTAcommunitymeeting3-FAQvF.pdf>, 11 (July 10, 2017).

The Chinatown community must have viable transportation options for its students. To achieve this, community members request explicit dialogue, planning, and engagement with city transportation services around accommodating Chinatown students who would be attending Dunbar. Current issues include commute times and transfers that would present a real barrier for students and families. Additionally, the Chinatown community continues to want a high school that has a college-preparatory program for both student and adult learners, STEAM programming, comprehensive bilingual programming, and adult learning programming. All these pieces must be considered when critically thinking about Dunbar as the solution for this community and others.

This recommendation requires the highest level of accountability and transparent communication. We believe that accountability is accomplished through creating space for authentic dialogue and the collection of specific metrics tracked to help define what is working and what is successful. Some of the groups that should be engaged in the dialogue around building a responsive and robust high school at Dunbar include:

- Dunbar Principal and Dunbar Local School Council;
- City Department Representatives (e.g. Chicago Transit Authority, Chicago Parks, etc.);
- The Chicago Teachers Union;
- The Dunbar Alumni Association;
- The Lugenia Burns Hope Center;
- Parent Advisory Councils of all schools within the footprints of the attendance boundaries;
- Coalition for a Better Chinese American Community;
- Representatives of the Ickes Prairie Homes;
- The Bilingual Parent Advisory Council; and
- All local school councils and alumni of all schools within the footprints of the attendance boundaries.

Another aspect of execution that will strengthen this alternative proposal would be the collection and analysis of meaningful metrics. Some examples of metrics that should be utilized include, but are not limited to:

- The collection of student achievement data for the future Dunbar community to ensure that there is never a drop, but rather *continued* stable achievement and ultimately upward growth by the student population.
 - Special consideration should be given to breaking down and analyzing the students already at Dunbar before any changes take place versus those matriculating in.
- The collection of population data outlining what the community looked like before and what it would look like after any respective change, to ensure there is never a drop in certain demographics of community members and to ensure communities are being included and remain robust.

This information can be used to support an ongoing inquiry about impact and unintended consequences. This data should be publicly available and regularly used to support district and community dialogue as plans for Dunbar progress into a proposal and are implemented at the school.

a. Other Systems – Level Recommendations.

In discussing the specific alternative to the current CPS proposal, the Equity Committee also identified recommended changes for CPS policy and practice that would help promote racial equity and inclusion when implementing *any* school change, and not just unique to the scenario before us. These systems-level recommendations include, but are not limited to the following:

- **Ensuring transparency around long-term projections and assumptions of future plans.** Acknowledging and planning for the fact that community demographics are constantly changing and evolving, a plan must always be forward-thinking, and take into account future projections of what the community will look like in five to ten years. This transparency about long-term projections ensures that the district avoids catalyzing exclusion and displacement of low-income students and families of color. This should include consideration of and planning for NTA’s continued ability to serve low-income African American students with a growing population in the Near South neighborhood;
- **Ensuring that school planning processes support citywide planning and engagement.** City transportation, city parks, city school systems etc. should all be in dialogue with one another when discussing any school change, (e.g. boundary reassignment, closure, merger, consolidation, opening, additions, etc.);
- **Ensuring a process that supports deeper and meaningful engagement across communities.** There should be a deliberate set up that provides space for communities like NTA, South Loop and Chinatown to meet regularly and engage in transparent conversations about each community’s needs in order to find commonalities. This also creates opportunities to honor each community within the partnership, and generate plans together, (therefore eliminating communities being pitted against one another by the city, because they have “competing needs.”); and finally
- **Establish a standard practice of conducting a third party Racial Equity Impact Assessment at the beginning stages of school action considerations, rather than at the tail end.** Racially disparate impacts of proposals require consideration at the very beginning of the process of any school closure, merger, consolidation, opening or addition. A REA can help identify and mitigate unintended consequences such as displacement of current students being served, and can reveal equitable solutions during transitions such as redirecting funding and resources to support students and schools in low-income communities like those surrounding NTA.

b. Modifications to the Current Proposal.

Should CPS not adopt the above proposal, the following include modifications, which are intended to minimize the inequitable burdens that will disproportionately affect certain communities and students. These modifications are absolutely critical to incorporate in the existing proposal if it moves forward.

The Equity Committee believes that the following measures present the absolute bare minimum mechanisms to reduce inequity. It is important to note that these adjustments to the proposal **would in no way remedy the inequities that will inevitably result**, but would take the existing plan one (albeit small) step, further, toward a more racially equitable outcome.

These modifications are not necessarily intended for CPS to implement alone, but are critical for CPS to consider when determining the requisite experts who could provide their technical expertise in the implementation phase. Modifications include, but are not limited to:

1. Revisit the engagement process in the name of inclusion and equity, and engage philanthropic institutions to ensure there is appropriate funding and resources dedicated to implementing more deliberate efforts to engage affected communities in school action considerations.
2. Ensure that NTA staff is retained and that they follow their students to SLES, to allow for familiarity and inclusion of NTA students in the new elementary setting.
3. Engage experts in the provision of ongoing and robust professional development to staff around specific skills in serving a new demographic of students, (e.g. providing training, resources and support around how to teach English Language Learners, and low-income students). This development should also keep in mind any demographic shifts in the student body and stay up to date.
4. Engage experts in the provision of ongoing and robust professional development to staff in the areas of cultural competency and implicit bias. This development should also keep in mind any shifts in diversity of the student body and stay up to date.

IV. CONCLUSION

The Equity Committee appreciates CPS' recognition of the value of Racial Equity Impact Assessments and the Board of Education's commitment to reviewing the outcomes of this tool prior to their decision. The success of a Racial Equity Impact Assessment is in the value it holds in the decision-making process and the degree to which it creates platforms to elevate community voice and foster collaborative decision-making.

Based on this work, we urge the Board of Education and Chicago Public Schools to reconsider its proposal to close National Teachers Academy in light of the substantive concerns raised in this Racial Equity Impact Assessment. Instead, we ask that there be an investment of the funds currently dedicated to redesigning NTA from an elementary school to a high school, to Dunbar, an under-enrolled school. This would create a more robust and optimistic approach at the viable physical space already in existence at Dunbar. It would also mean an investment in improving



the quality of services there along with other community needs. This alternative would achieve the same goal that CPS set out to obtain: providing high-quality neighborhood school options to the South Loop, without creating an undue burden to a primarily African-American community at a successful school like NTA.

Sincerely,

The Members of the Equity Committee⁵⁷

cc: Ms. Janice Jackson, Chief Executive Officer, CPS #299
Dr. Tony Smith, State Superintendent Illinois State Board of Education
Judy Camacho, CPS
Dr. Amara Enyia, Public Policy Consultant
Ianna Kachoris, University of Chicago
Dr. Amanda Lewis, University of Illinois at Chicago (UIC)
Marisa Novara, Metropolitan Planning Council
Beatriz Ponce de Leon, Executive Director of Generation All
Dr. David Stovall, University of Illinois at Chicago (UIC)
Debbie Liu, Coalition for a Better Chinese American Community
Jennifer Rakstad, Parent representative SLES LSC and Space Planning Committee
Dr. Tiffany McDowell, Facilitator of Equity Committee Meetings
Juan Sebastian Arias, Policy Adviser of Equity Committee Meetings
Niketa Brar, Executive Director, Chicago United for Equity

⁵⁷ A Policy and Advocacy Leadership for Educational Equity Fellow supported the editing process of the REA.

APPENDIX
Figures 1 - 10

Demographics and Statistics: South Loop and NTA

		NTA	South Loop
Demographics	African American	82%	43%
	Asian	3%	13%
	Hispanic	7%	10%
	White	5%	26%
	Other	3%	8%
Statistics	Low Income	79%	29%
	Diverse Learner	11%	6%
	Limited English	4%	10%
	Mobility Rate	12%	9%



Black Males

31%

37%

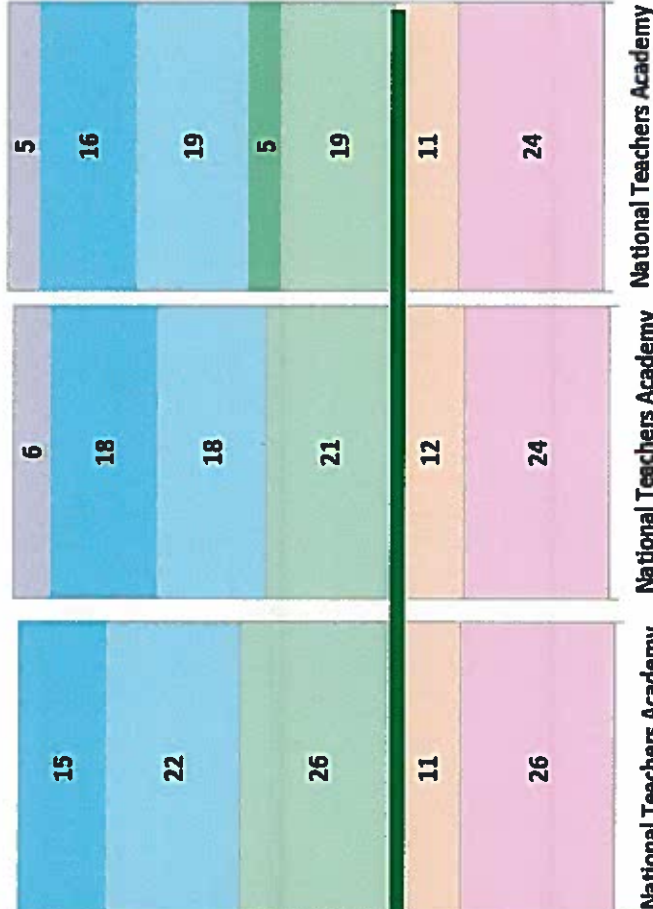
60%

63%

63%

64%

- > 2 Years ABOVE Grade Level (89-99%ile)
- 2 Years ABOVE Grade Level (77-88%ile)
- 1 Year ABOVE Grade Level (60-76%ile)
- AT GRADE LEVEL Upper Range (50-59%ile)
- AT GRADE LEVEL Lower Range (40-49%ile)
- 1 Year BELOW Grade Level (23-39%ile)
- > 2 Years BELOW Grade Level (0-22%ile)



National Teachers Academy

School Performance: South Loop and NTA

	NTA	South Loop
SQRP Metrics	% of grade 3-8 students meeting or exceeding national average in growth (NWEA)	75%
	Grade 3-8 national growth percentile (NWEA)	52nd math 58th reading
	Grade 3-8 national attainment percentile (NWEA)	47th math 56th reading
	5 Essentials Survey (My Voice, My School)	Well organized
	SQRP (2016-2017)	Level 1
		Moderately organized
		Level 1+



Demographics

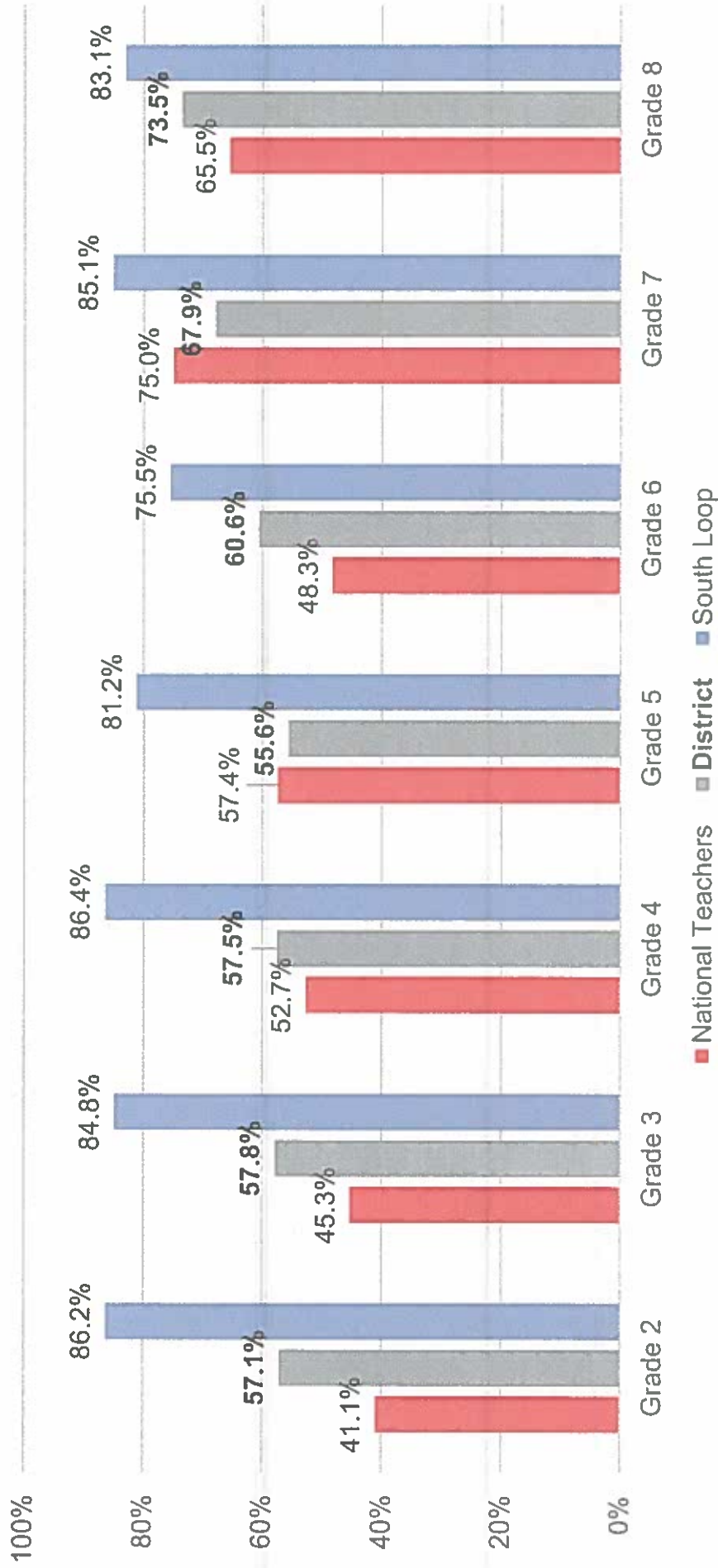
Overall, RGC and neighborhood

	Students	Race						Diverse Learners	Low income
		African American	Hispanic	Asian	White	Other			
NTA overall	706	82%	7%	3%	6%	3%	11%	77%	
NTA NBHD	569	93%	4%	0%	2%	1%	13%	90%	
NTA RGC	137	33%	21%	16%	20%	9%	1%	24%	
SLES overall	779	42%	10%	13%	27%	8%	6%	23%	
SLES NBHD	659	45%	9%	12%	25%	8%	6%	25%	
SLES RGC	120	28%	13%	19%	33%	8%	3%	13%	

Legend: ■ < 10% represented ■ > 80% represented N/A – No students

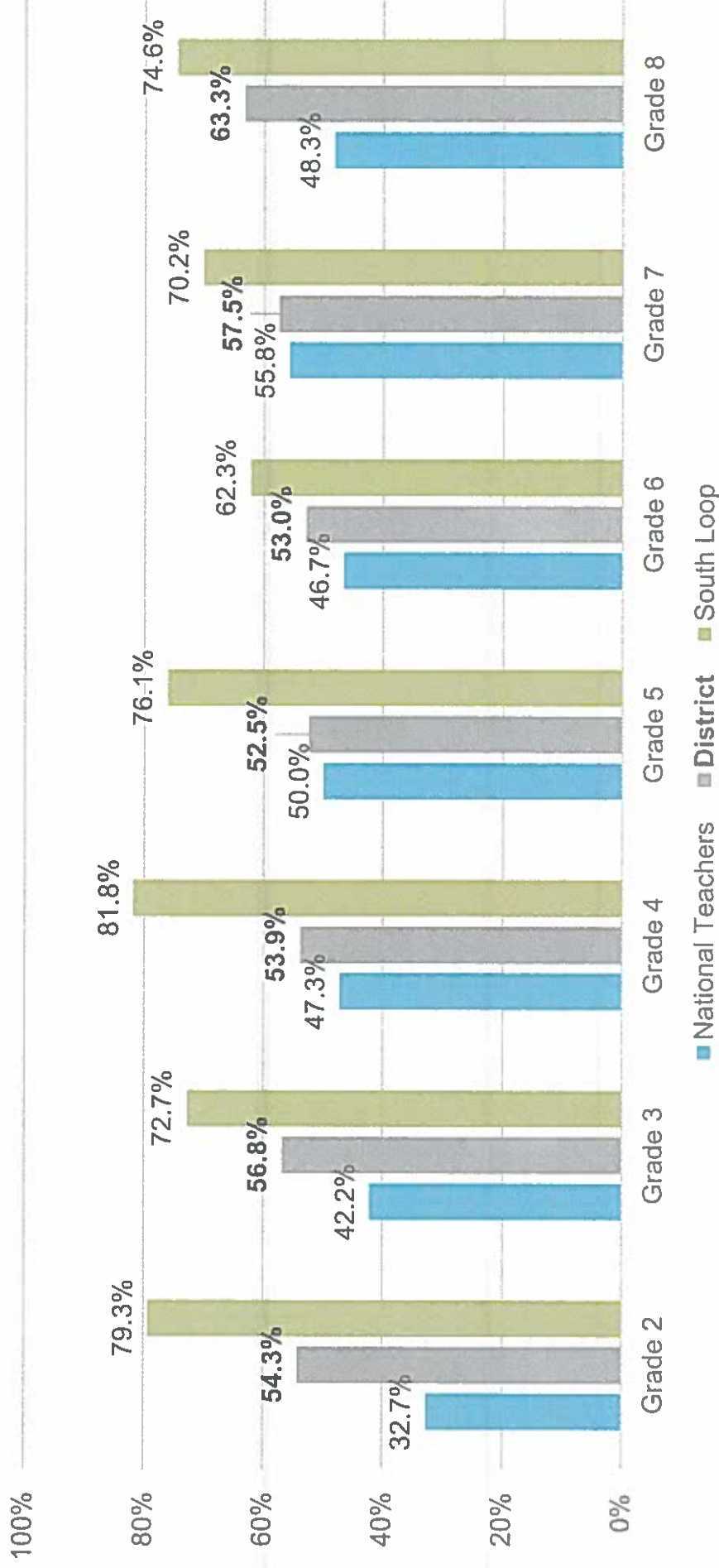
NWEA Reading Attainment, Neighborhood Students, by Grade

Neighborhood Program

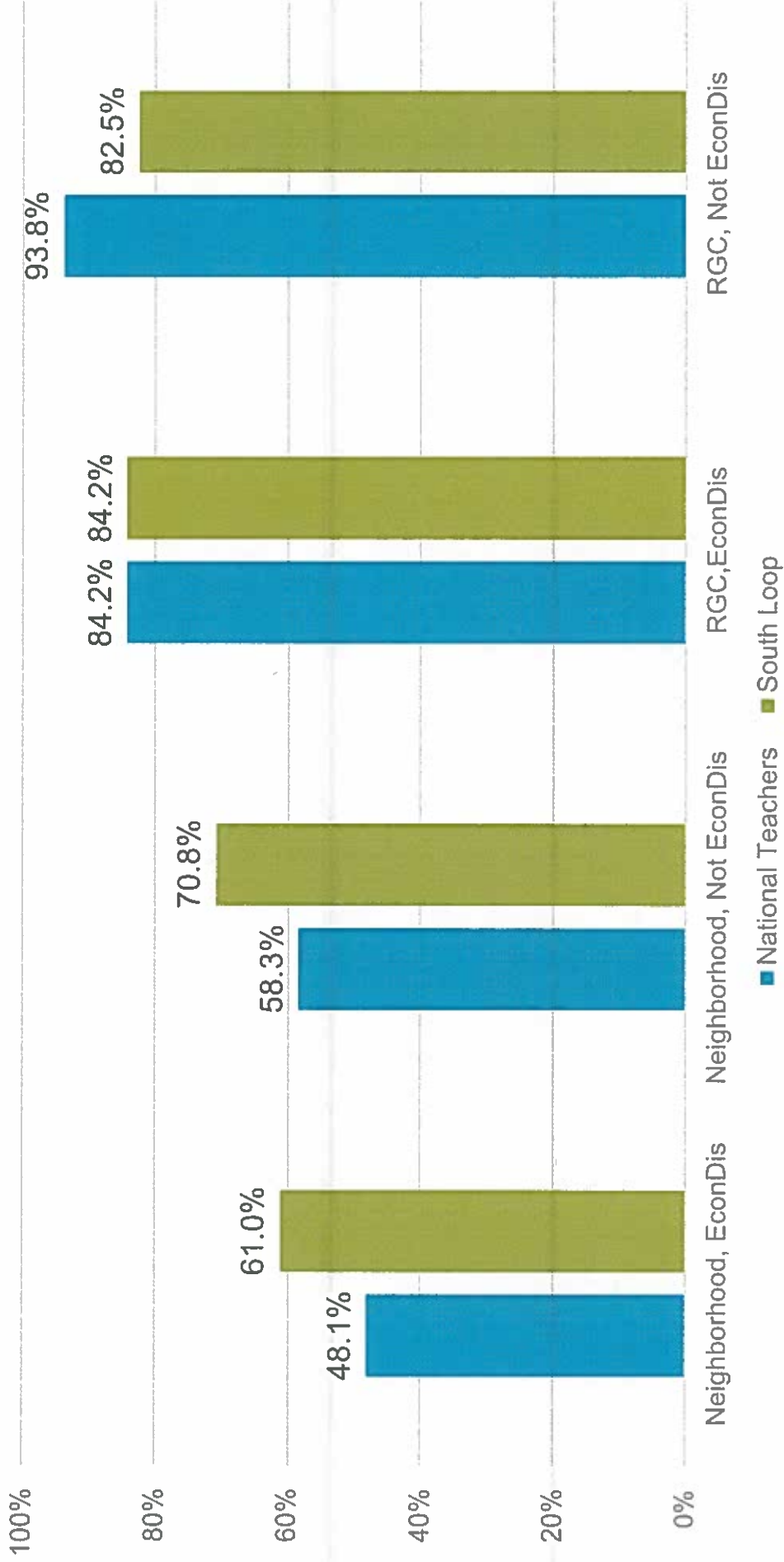


NWEA Math Attainment, Neighborhood Students, by Grade

Neighborhood Program

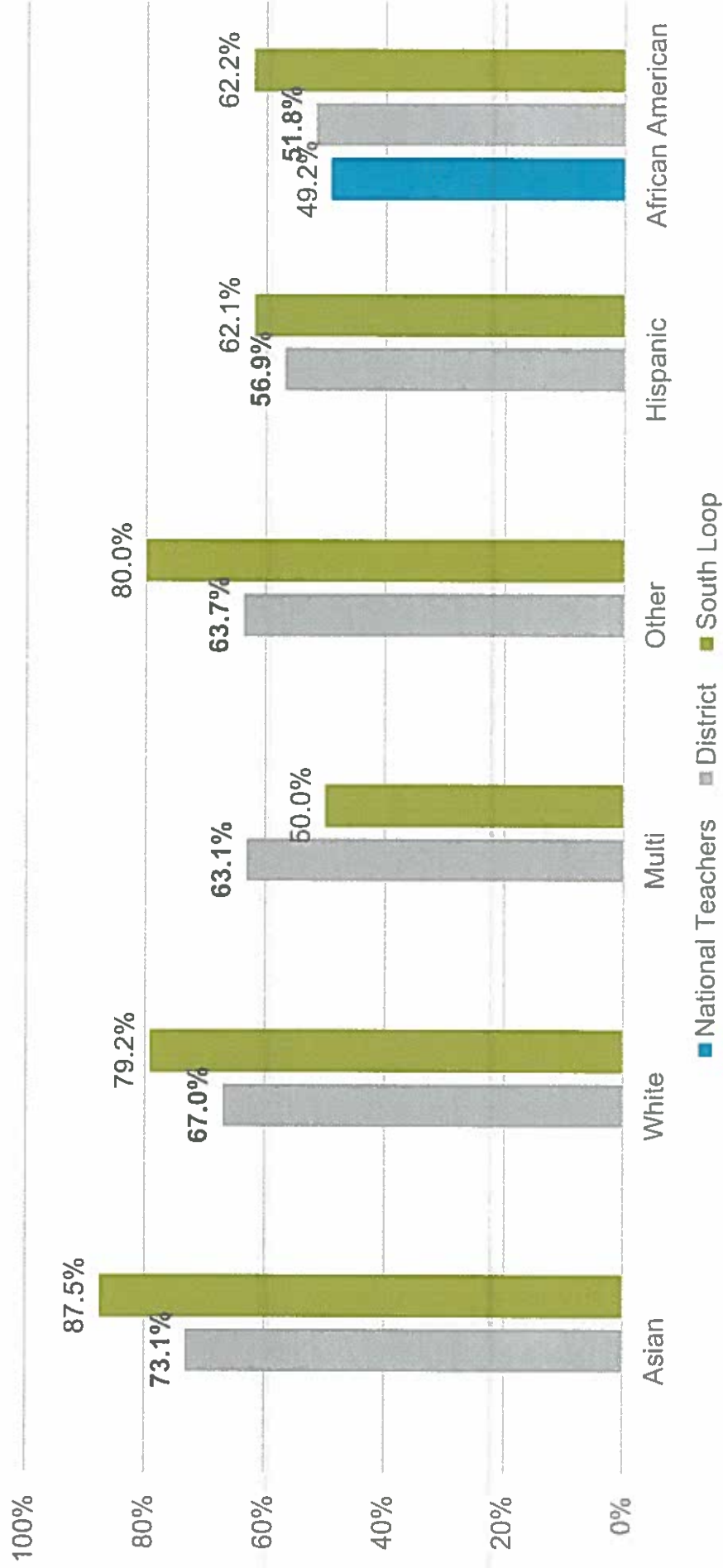


NWEA Math Growth, by Program and School for Economically Disadvantaged Students

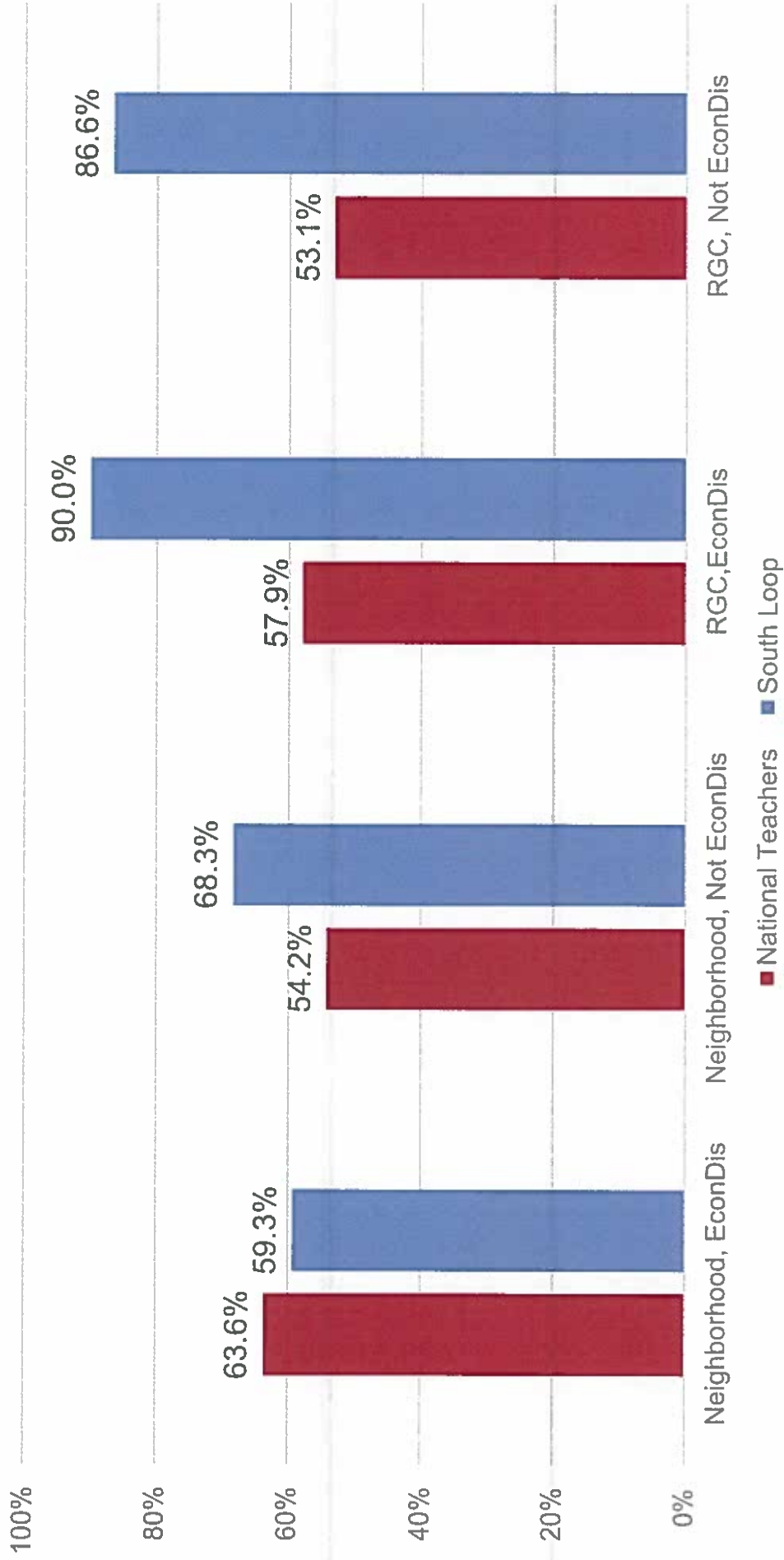


NWEA Math Growth, Neighborhood Students, by Race

Neighborhood Program



NWEA Reading Growth, by Program and School for Economically Disadvantaged Students



NWEA Reading Growth, Neighborhood Students, by Race

Neighborhood Program

