

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
DELTA DIVISION**

**DIANE COWAN, et al.**

**PLAINTIFFS**

**and**

**UNITED STATES OF AMERICA**

**PLAINTIFF-INTERVENOR**

**v.**

**Civil Action No. 2:65-CV-00031-GHD  
(previously DC 6531-K)**

**BOLIVAR COUNTY BOARD OF  
EDUCATION, et al.**

**DEFENDANTS**

**CLEVELAND SCHOOL DISTRICT'S PROPOSED PLAN**

COMES NOW the Cleveland School District (the "District"), in response to this Court's directive of March 28, 2012, and proposes the following plan to improve integration at East Side High School and D.M. Smith Middle School.

**Plan for East Side High School**

The District proposes multiple strategies to improve integration at East Side High School ("East Side"):

1. Create, market, and implement a new magnet program within the school focusing either on (a) science, technology, engineering and math or (b) science, math and health education, with particular emphasis on internships and other community work-related opportunities. The District will plan the new magnet over the coming school year and implement it beginning with the 2013-14 school year. The goal of the new magnet will be a racial makeup between 50% black/50% non-black and the District-wide student racial ratio (which in school year 2011-12 was 67% black/33% non-black). Students who choose the new magnet program will enroll as East Side students.

2. Revitalize and restructure the International Baccalaureate program at East Side by making it a magnet program within the school for students in grades 9-12 who choose to enroll in the program. Emphasize the natural continuation and culmination of the IB programs in which students have already chosen to participate at the successful elementary magnets, Hayes Cooper Center and Bell Academy. Build upon this academic year's success in attracting 11th and 12th grade students from CHS to IB Math and IB Science at East Side by offering IB classes for history, psychiatry, and foreign languages. (*See* Exh. A; chart showing present utilization of the East Side IB program by Cleveland High students). Beginning with the 2014-15 school year, students who choose the program with the school will enroll at East Side.

3. Build upon the success of attracting white students to courses at East Side in public speaking, debate, and advanced math by continuing to market these courses. The District will implement this step for the 2012-13 school year. (*See* Exh. B; chart of student enrollment in AP math, advanced math, debate, and public speaking at East Side by Cleveland High students for the current school year 2011-12.)

4. Open all remedial courses at East Side to CHS students, for whom no such programs are presently offered, for the 2012-13 school year.

5. Open the choral music program and choirs at East Side to CHS students, for whom no such offerings are currently available, for the 2012-13 school year.

6. The District will implement and fully fund the proposals, although it may also seek grant funding.

7. The District will provide transportation to all students who wish to attend the programs at East Side.

### **Plan For D.M. Smith Middle School**

The District proposes several strategies to improve integration at the middle school:

1. Create a new magnet program within the school that will mirror and build toward the new magnet program at East Side, thereby establishing continuity for students moving from middle to high school. The new magnet program will focus on either (a) science, technology, engineering and math or (b) science, math, and health education. The District will plan the new magnet over the coming school year and implement it beginning with the 2013-14 school year. As at East Side, the goal of this new magnet program is a racial makeup between 50% black/50% non-black and the District-wide student racial ratio enrollment of approximately 67%black/33% non-black. Students who choose the new magnet program will enroll as D.M. Smith students.
2. Revitalize the IB Middle Year Program (“MYP”) program by making it a magnet program within the school and undertake an effective advertising campaign to publicize the program’s benefits with special emphasis on enrolling students from Hayes Cooper Center, a primary IB program, and emphasizing its continuation only into East Side. Beginning with the 2014-15 school year, students who choose the IB program within the school will enroll at D.M. Smith.
3. Open classes in choral music, choirs, and art at D.M. Smith to all students from Margaret Green Junior High.
4. Market to the entire community the newly constructed twelve traditional classrooms which will open for the 2012-13 school year, thereby eliminating the open concept class space for all core academic courses and resulting in expanded space for art, music, including the special music training currently available, and other extracurricular activities.
5. The District will implement and fully fund the middle school proposals, although

it may also seek grant funding.

6. The District will provide transportation to all students who wish to attend the programs at D.M. Smith.

The District requests that the Court permit the District to phase in its proposed plan at the two schools. A phase-in period, instead of immediate changes for the coming school year, will enable the District to better plan, coordinate, and implement its proposed programs thereby giving them an increased opportunity for success.

### **Faculty Reassignment**

The District will reassign faculty over the next two years. By end of the 2013-2014 school year (for contracts in preparation for the 2014-15 school year), faculty racial makeup at each school will be within  $\pm 15\%$  points of the school level's (elementary or secondary) racial composition. This reassignment will begin with voluntary reassignment among the teaching staff with mandatory reassignment undertaken by the District if voluntary reassignment is insufficient to meet the above-referenced goal. The District represents to the Court that in conferences with counsel for the United States, they have indicated agreement to a phase in of compliance with the faculty racial ratio.

### **Analysis**

The District believes that the plans detailed above are an effective and constitutionally sound methods to improve integration. As noted in this Court's Opinion of March 28, 2012, the District has a long and successful history with the implementation of magnet programs. *See* Memorandum Opinion, Dkt. No. 43 at 30-31. In fact, this Court termed the progress created by magnet initiatives in the District "nothing short of remarkable." *Id.* at 36. The substantial experience of District administrators in both grant writing and implementation of magnet



programs provides the magnet initiatives at East Side High School and D.M. Smith Middle School opportunities for success. The District's existing magnet programs amply demonstrate that a well planned, marketed, and executed magnet program can and attracts students of every race.

More importantly, this plan is constitutionally permissible. Its elements, when viewed as a whole, satisfy the Supreme Court's directive to eradicate any remaining vestiges of *de jure* segregation to the extent practicable. *See Freeman v. Pitts*, 503 U.S. 467, 494 (1992). By this measure of constitutionality, the District's plan to institute certain programs and courses will serve to draw students of all races to the same classrooms. This plan also embraces the District's practical needs in that it provides flexibility and does not pursue rote racial balancing for its own sake. *See Swann v. Charlotte-Mecklenburg Bd. of Educ.*, 402 U.S. 1, 12 (1971). The District believes that the new and revitalized programs described in the plan will create the type of integration, over time, achieved by its other successful integrative initiatives.

Courts nationwide have recognized the implementation of magnet programs within schools as integrative measures sufficient to create unitary status as to student assignment. *See, e.g., Middlebrook v. Sch. Dist. of County of Knox*, 805 F. Supp. 534 (E.D. Tenn. 1991); *Stell v. Board of Public Education*, 724 F. Supp. 1384 (S.D. Ga. 1988); *Diaz v. San Jose Unified School Dist.*, 633 F. Supp. 808 (N.D. Cal. 1985); *Vaughns v. Bd. of Educ.*, 18 F. Supp. 2d 569 (D. Md. 1998). These decisions, together with the other school district cases in which Dr. Rossell was involved, confirm that the District's plan is constitutionally sound and satisfies this Court's directive to further integrate East Side High School and D.M. Smith Middle School.

Dr. Rossell, the District's desegregation expert, has participated fully in formulating the proposed plan. In her supplemental report, which is attached as Exhibit C, she endorses the plan

and explains her reasons in support the plan.

### **Conclusion**

The District's proposed plan allows a timely and smooth transition for improved desegregation at the two schools and reassignment of faculty at all school to meet the school level's faculty racial with a permitted deviation of  $\pm 15\%$ . The plan is constitutionally permissible, and does not burden any race or classification of student more substantially than another. The District submits that this proposed plan will achieve the goal of eliminating any remaining vestiges of *de jure* segregation while also improving academic opportunities for all students in these schools.

Respectfully submitted, this the 15th day of May, 2012

### **CLEVELAND SCHOOL DISTRICT**

By: /s/ Holmes S. Adams  
Holmes S. Adams

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2012, I served copies of the above document to counsel of record by electronic service through the court's electronic filing system, otherwise via electronic or first class mail, postage pre-paid to:

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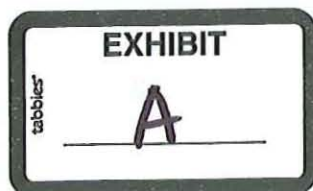
This the 15th day of May, 2012.

/s/ Holmes S. Adams  
Holmes S. Adams

**Exhibit A**

**Student Enrollment at East Side in IB Math and Science for 2011-12 school year**

	Asian	Hispanic	Black	White
IB Math	0	2 (2 CHS)	8 (4 CHS/4EHS)	12 (12 CHS)
IB Science	1 (1 CHS)	2 (2 CHS)	7 (3 CHS/4 ESH)	0



**Exhibit B****Student Enrollment at East Side in Advanced Math, Debate, and Public Speaking Courses  
2011-12 School Year**

<b>Course</b>	<b>Asian</b>	<b>Hispanic</b>	<b>Black</b>	<b>White</b>
AP Calculus	(1 CHS)	0	8 (3 ESH/5 CHS)	3 (3 CHS)
AP Calculus	2 (2 CHS)	1 (1 CHS)	12 (8 ESH/4 CHS)	3 (3 CHS)
Pre-Calculus	2 (2 CHS)	1 (1 CHS)	9 (4 ESH/5 CHS)	14 (14 CHS)
Pre-Calculus	0	1 (1 CHS)	5 (1 ESH/4 CHS)	1 (1 CHS)
Trigonometry	1 (1 CHS)	1 (1 CHS)	9 (4 ESH/5 CHS)	14 (14 CHS)
Trigonometry	0	1 (1 CHS)	5 (1 ESH/4 CHS)	1 (1 CHS)
Debate	0	0	19 (12 ESH/7CHS)	4 (4 CHS)
Public Speaking	0	0	18 (10EHS/8CHS)	3 (3 CHS)



**A Supplemental Report on  
Cleveland, Mississippi's Integration Progress and Proposed New Plan**

Christine H. Rossell  
Political Science Department  
Boston University

A report prepared in the case of  
*Cowan and U.S. v. Bolivar County Board of Education, et al.*,

May 15, 2012



**A Supplemental Report on  
Cleveland, Mississippi's Integration Progress and Proposed New Plan**

The purpose of this report is to demonstrate the progress of the Cleveland, Mississippi School District with regard to student and teacher integration, its commitment to the black community, and to explain and support the proposed new plan. This is a supplement to my previous report submitted on August 16, 2011 in this case. My conclusions are that 1) the Cleveland School District has continued its commitment to student integration by revitalizing and expanding the magnet programs and considering the adoption of programs within a school, a constitutional and attractive magnet structure, 2) to supporting the formerly black schools in the district as shown by the greater per pupil expenditures at those schools, and 3) to hiring black instructional staff and principals and assigning them in a manner that has not reduced teacher racial balance.

The conclusions and opinions I offer in this report are based on my past experience--25 years of experience designing and analyzing school desegregation plans, 38 years of research on the impacts of school desegregation plans, 32 years of consulting for school districts across the U.S. in connection with educational equity court cases, 25 years of experience designing and analyzing opinion surveys, and 37 years of teaching courses on school desegregation, educational policy, public policy, and research methods. This experience is detailed in my Curriculum Vita which is attached to this report as Appendix 1. My conclusions and opinions, discussed in more detail below, are also based on my analysis of court documents and legal briefs in this and other cases, of reports to the court submitted by the Cleveland School District, and of enrollment by school and by race in the Cleveland School District from 1967-68 to 2011-



12 available from the Office for Civil Rights, the Common Core of Data, and the district's reports to the court. I also rely on student and staff data in other school districts obtained from the districts themselves, the Office for Civil Rights and the Common Core of Data.

Finally, on Monday, April 16<sup>th</sup>, 2012, I, accompanied by school district counsel, visited Bell Elementary, Pearman Elementary, East Side High School, and Margaret Green Junior High School and on Tuesday, April 17<sup>th</sup>, we visited Cleveland High School, D.M Smith, Cypress Park, and Hayes Cooper. I not only toured the schools, looked into every classroom and visited all the common areas ((libraries, cafeterias, auditoriums, playgrounds, and gymnasiums), but we talked extensively to the principals of each school about what they thought had made their magnet successful (if that was the case) or not successful. We also talked about what would make magnets in D.M. Smith and East Side successful. I, along with school district counsel, also talked to school board members and the superintendent, Dr. Jacquelyn C. Thigpen, about these and other issues on Monday, April 16<sup>th</sup>.

#### **Student Assignment and the Progress of School Desegregation**

As detailed in my 2011 report, the history of school desegregation in the Cleveland, Mississippi School District is similar to that of many other southern school districts. The first relevant court order occurred in 1969 and was basically a neighborhood school plan with Majority to Minority (M to M) transfers—any student could transfer from a school where his or her race was in the majority to a school where his or race was in the minority--with provisions regarding faculty and staff desegregation. The court then approved a series of Consent Orders in 1989, 1992, and 1995 that did not change the 1969 neighborhood school plan, but added additional “choice” options and requirements.



As shown in Table 1, the Cleveland School District has continued to become more integrated during the 2011-12 school year under its voluntary desegregation plan (information that the court may not have been aware of before its March 28, 2012 decision). Not only has the number of whites in the school district increased under the current voluntary desegregation plan from 1047 in 2010-11 to 1107 in 2011-12, as shown in Table 1, but the gap between the percentage white in the school district as a whole and the percentage white in the average black child's school (labeled IEb in Table 1) has narrowed again this academic year as shown in Table 1 and Figure 1.<sup>1</sup> In other words, the school district has become more integrated. Perfect integration is when the two lines in Figure 1 meet. If no changes were made in the plan that would probably occur in a few years as a result of the increasing white enrollment.

Table 1 and Figure 2 show that on another measure of integration, the level of racial imbalance (labeled Db in Table 1),<sup>2</sup> continues to decline. Put another way, the Cleveland School District has become more racially balanced during the 2011-12 school year with its current voluntary plan.

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<sup>1</sup> The formula for interracial exposure is

$$IEb = \frac{\sum_k N_{kb} P_{kw}}{\sum_k N_{kb}}$$

where  $N_{kb}$  is the number of black students in a school and  $P_{kw}$  is the proportion white in the same school. This is summed across schools and divided by the number of black students in all schools.

<sup>2</sup> The formula for the level of racial imbalance (called the index of dissimilarity in the school desegregation literature) is

$$Db = \frac{1}{2} \sum \frac{|W_i - B_i|}{|W - B|}$$

where  $W_i$  is the number of whites in a school and  $B_i$  (or  $M_i$ ) is the number of black students (or minority students) in the same school,  $W$  is the number of whites in a school district and  $B$  (or  $M$ ) is the number of black students (or minority students) in the same school district. This is summed down all schools and the total divided by 2.

There is more integration occurring than can be seen by just analyzing school enrollment. All International Baccalaureate (IB) and Advanced Placement (AP) math and advanced math classes have been transferred to East Side High School as a result of the magnet programs there. If a white student from Cleveland High wants to take these classes, they are bused to East Side High. There are 12 white students from Cleveland High (CHS) enrolled in the IB math class at East Side, six white students from CHS enrolled in the AP Calculus courses, 15 white students from CHS enrolled in the pre-Calculus courses, and 15 white students enrolled in the Trigonometry courses. Black, Hispanic, and Asian students from both East Side and Cleveland High also attend these classes and so they are integrated, but this integration is not reflected in the enrollment statistics.

In addition, four white students from Cleveland High are enrolled in the Debate class at East Side High and three in the public speaking class along with black students from both East Side and Cleveland High Schools. So again, there are integrated classes at East Side whose integration is not reflected in the enrollment statistics. This shows the Cleveland School District's commitment to integration, even when it does not take credit for it.

#### **Financial Support for Schools on the East Side**

The school district's commitment to the formerly black schools on the east side of the district is evident in Table 2 below which shows the per pupil expenditures for the last three fiscal years for formerly white and formerly black schools in Cleveland at the elementary and secondary school level.<sup>3</sup>

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<sup>3</sup> The formerly white elementary schools are Parks and Pearman and the secondary schools are Margaret Green JHS and Cleveland High. The formerly black elementary schools are Bell, Cypress Park, Hayes Cooper, and Nailor and the secondary schools are D.M. Smith Middle and East Side High.

Table 2			
Per Pupil Expenditures in Formerly White and Formerly Black Schools, Cleveland, MS, FY09 to FY11			
	FY09	FY10	FY11
Formerly White Elementary Schools	\$5,805	\$5,672	\$7,078
Formerly Black Elementary Schools	\$7,067	\$6,538	\$7,388
Formerly White Secondary Schools	\$6,291	\$ 6,270	\$6,022
Formerly Black Secondary Schools	\$9,491	\$ 9,329	\$9,599

The data show clearly that the Cleveland School District spends significantly more on formerly black schools than on formerly white schools at both the elementary and the secondary level, although the difference is greatest at the secondary level. At the secondary level, the formerly black schools have about a \$3,000 per pupil expenditure advantage over the formerly white schools. Once again, these data show the Cleveland School District's commitment to the formerly black schools on the east side of the district.

### **Magnet Programs**

There are three kinds of magnet structures and they vary in their success. The most successful is what I term a "dedicated" magnet,<sup>4</sup> in which the school is emptied of its resident population or has been vacant for some time. Students are then asked to apply from anywhere in the school district and the district provides transportation. Thus, the entire school consists solely of students who chose the magnet. This is a primary reason for the success of Hayes Cooper and Bell Academy. Hayes Cooper was vacant at the time it was turned into a "Primary Years" (PYP) International Baccalaureate (IB) magnet program and students were admitted on the basis of their desire to be in the program. The students attending Bell Academy at the time it became a

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<sup>4</sup> See Christine H. Rossell, "The Desegregation Efficiency of Magnet Schools," Urban Affairs Review (formerly Urban Affairs Quarterly), vol. 38, May 2003: 697-725.



dedicated magnet were assigned to nearby elementary schools and there was enough capacity in those nearby schools that this could be accomplished. Bell Academy was then advertised as a new magnet school specializing in math, science, health, and wellness in which everyone in the school would be there because of their interest in this program.

Although these kinds of magnet programs are very successful, they are also difficult to create. I do not know of any school district that has more than two or three of them. It is unusual for a school district to have a vacant facility that is suitable as a school or to have the resources and time to build a new school that could open as a magnet. Emptying out a currently occupied school of its resident student population and reassigning them elsewhere is not only politically difficult, especially at the secondary level where there is strong school loyalty, but usually impossible to do since it is rare that nearby schools would have the capacity to accept these students.

The least successful program is what I have termed a “whole school attendance zone” magnet.<sup>5</sup> These schools consist of students who live in the attendance zone of the school and as a result have been assigned to that school. Everyone in the school is enrolled in the magnet program whether they are interested in the theme or not. In short, they have no choice. If the school is in a black neighborhood, it will attract few whites, and probably only those who lived in the attendance zone to begin with. These are the kinds of magnet programs that Nailor, D.M. Smith and East Side High have and it is undoubtedly part of the explanation for why whites do not enroll in those schools. They understand that these are not truly schools of “choice.”

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<sup>5</sup> *Ibid.*

In between these two types of magnet structures is something I have termed a “program-within-a-school” (PWS).<sup>6</sup> This is the most common magnet structure used in the U.S. because it is practical and it is acceptable to federal district and state courts.<sup>7</sup> In this magnet structure, the magnet theme is a separate part of the school. The students in the magnet theme have all chosen to be in that program because they are interested in it. There are no students in the magnet classes solely because they live in the attendance zone. At the middle and high school level, because of the size of the schools and students’ varying interests, there are typically more than one magnet program within the same school. These programs are not only successful, but practical and that is why they are the most common type of magnet structure.<sup>8</sup>

**East Side High School.** Therefore, I support the concept of an additional PWS magnet in East Side High School that focuses on science, technology and math (STEM) or science, math and health education, with particular emphasis on internships and other community work-related opportunities. I also support restructuring the IB program at East Side as a PWS magnet. The fact that white students are willing to be bused from Cleveland High to East Side High for the IB classes that are currently offered suggests that white students would be willing to enroll at East Side if the IB program were expanded and was a program within a school. My hope, however, is that the growth in white enrollment will come from the whites that are currently attending private schools in the Cleveland School District or nearby counties. The

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<sup>6</sup> *Ibid.*

<sup>7</sup> I have helped design voluntary magnet school desegregation plans in the following school districts, all of which contained programs-within-school magnets that were approved by the federal district court as an acceptable remedy: Baton Rouge, LA, 1996; Knox County, Tennessee, 1991; Stockton, California, 1989; San Jose, California, 1986; Yonkers, New York, 1986; Savannah-Chatham County, Georgia, 1986; De Kalb County, Georgia, 1986; and Marion County, Florida, 1983. All of these school districts have since attained unitary status, with the possible exception of Knox County on which I have no information, with their PWS magnets. In addition, although I did not design the Kansas City, Missouri magnet school plan, it too had PWS magnets that were accepted by the federal district court as a remedy and it has also since attained unitary status.

<sup>8</sup> *Supra*, note 6.

conundrum the district faces is that if too many Cleveland High whites transfer to East Side High, rather than from private schools or nearby districts, the court's description of Cleveland High as "the educational utopia contemplated by *Brown I.*..."<sup>9</sup> may become inaccurate.

I further support opening all remedial courses, the choral music program, and choirs, at East Side to Cleveland High students, for whom no such offerings are currently offered, as well as moving human anatomy and physiology from Cleveland High to East Side High.

**D.M. Smith Middle School.** I further support the new science, technology, engineering and math (STEM) program, proposed for D.M. Smith. Another option, a science, math, and health education magnet program is being investigated since it has attracted whites to Bell Elementary. However, since some portion of Bell Elementary's success is undoubtedly due to the fact that it is a dedicated magnet—that is, the students were reassigned to other schools permanently so the school was essentially vacant and all students who are there now chose to attend the school—this issue will be investigated and analyzed further in the upcoming school year—2012-13.

I also support revitalizing the IB Middle Year Program (MYP) with primary emphasis on recruiting students from the Hayes Cooper PYP program. Hayes Cooper currently has a PK-6 grade structure. The district should explore changing this to a PK-5 grade structure as suggested by the principal, Beverly Hardy (also the district's magnet coordinator).<sup>10</sup>

If the MYP program at Hayes Cooper ends in grade 5, it will be easier to recruit these students to an MYP program at D.M. Smith, which has a 6-8 grade structure, than it would be if they were one year late to the program—that is having missed the 6<sup>th</sup> grade of the MYP IB

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<sup>9</sup> Cowan, et al. and U.S. v. Bolivar County Board of Education, Civil Action No. 2:65-CV-00031-GHD, Filed March 26, 2012, p. 24

<sup>10</sup> Personal communication, April 17, 2012.



program at D.M. Smith because they were in the 6<sup>th</sup> grade PYP program at Hayes Cooper. These are, however, all issues that will be explored in the upcoming 2012-13 school year.

I also support opening and advertising all classes in choral music and choir at D.M. Smith to all students at Margaret Green Junior High School. In addition, the renovations that I observed at D.M. Smith, which are creating 12 traditional classrooms, need to be advertised extensively, not only because they expand the space for art and music, including the special music training currently available, and other extracurricular activities, but because they make the school more attractive. The district is clearly and unequivocally committed to the formerly black schools on the east side.

#### **Instructional Staff Racial Imbalance**

The 1989 Consent Order slightly modified the 1969-70 consent order which required only that no school was to be racially identifiable by its instructional staff by further opining that the faculty and professional staff at each school were to reflect “*to the extent feasible*,”<sup>11</sup> [emphasis added] the district wide ratio of minority and nonminority faculty and professional staff. Most courts allow a deviation from the district wide ratio since elementary and secondary instructional staff are not fungible and achieving exactly the same racial balance in every school is not possible to achieve when the faculty and professional staff have specialties and talents that are needed in specific schools or grade levels.

As in my August 16, 2011 report, I used two different measures: one a categorical one—the percentage of schools within a certain range of the elementary or secondary racial composition—and the relative exposure of black to white teachers in a school. Although the district’s proposed

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<sup>11</sup> Cowan, et al. v. School District Number IV of Bolivar County, Mississippi, Civil Action NO. DC 6531-K, Sept. 21, 1989, p. 2.

new plan will use a common standard used by the court's to measure racial balance—that a school's racial composition be within +/- 15 percentage point of its school level's (elementary and secondary) racial composition, I also analyze progress and achievement in a more precise way than a categorical measure in which a school can fall in or out of imbalance with very little change. This measure, relative exposure, is similar to the index of dissimilarity in that it measures all deviation from racial imbalance.<sup>12</sup> Both measures are considered by social scientists to be superior to categorical measures and the relative exposure index is generally preferred to the index of dissimilarity because it is thought to have better properties.<sup>13</sup> The relative exposure index adjusts the interracial exposure index for the racial composition of the district's instructional staff (or whatever unit is being analyzed).

On the first measure, the percentage of students within +/- 15 percentage points, Figure 3 shows that teacher racial *imbalance* has improved dramatically since 1967 and has been maintained this year at the level it was last year. Figure 4 shows the same pattern.

I believe that the Cleveland School District has the capacity and willingness to reassign teacher to improve racial balance in the schools in the next two years, although it has achieved the goal of not having any school be racially identifiable by its instructional staff. It is, however, prudent and respectful of the instructional staff to first ask for volunteers as the Cleveland School administration plans to do.

In addition, the commitment of the school district to hire black instructional staff and to teacher desegregation is further illustrated by the fact that the percentage black of the

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<sup>12</sup> The formula is  $Rbw = (pw - IEb) / pw$  where  $pw$  is the proportion white of the teaching staff of a school level and  $IEb$  is the proportion white of the teaching staff in the average black teacher's school at a school level.

<sup>13</sup> The index of dissimilarity continues to be used to measure *school* desegregation in order to provide continuity going back to the 50s when it was first used.



instructional staff has increased from 36 percent in 2010-11 to almost 39 percent this year (2011-12) without reducing teacher racial balance. As noted, in my August 16, 2011 report, this percentage is higher than the State of Mississippi and the U.S. as a whole.

#### **Administrator Racial Composition**

The Cleveland School District has continued its commitment to appointing black principals. Five of the 11 schools in the district have a black principal. In addition, the superintendent, Dr. Jacquelyn Thigpen is a black female.

#### **Conclusion**

To reiterate, my conclusions are that 1) the Cleveland School District has continued its commitment to student integration by revitalizing and expanding the magnet programs and considering the adoption of programs within a school, a constitutional and attractive magnet structure, 2) to supporting the formerly black schools in the district as shown by the greater per pupil expenditures at those schools, 3) to hiring black instructional staff and principals and assigning them in a manner that has not reduced teacher racial balance.

#### **Compensation and Qualifications**

I am being paid at the rate of \$200 an hour plus expenses. The cases in which I have testified or been deposed and my publications are listed in my Vita which is attached as Appendix 1.

A handwritten signature in black ink, reading "Christopher D. Russell". The signature is written in a cursive style with a large, stylized "C" and "R".

May 15, 2012

**Table 1**  
**Trends in Enrollment and Desegregation in the Cleveland School District, Mississippi,**  
**1967-68 through 2010-2011**

Data Source	Year	Plan	Black	White	Other	Total	% White			Deseg. Indices	
							Enroll Change	% White	% Black	IEb	Db
OCR	67-68		2821	2275	0	5096		44.6%	55.4%	1.4%	0.986
OCR	68-69		2811	2184	55	5050	-4.0%	43.2%	55.7%	1.4%	0.986
OCR & Report	69-70	C.O.	2902	1797	53	4752	-17.7%	37.8%	61.1%	4.8%	0.938
OCR	70-71		2953	1765	52	4770	-1.8%	37.0%	61.9%	11.7%	0.834
OCR	71-72		3068	1767	48	4883	0.1%	36.2%	62.8%	11.4%	0.839
OCR	72-73		2984	1694	59	4737	-4.1%	35.8%	63.0%	9.7%	0.868
OCR	73-74		3072	1694	52	4818	0.0%	35.2%	63.8%	9.8%	0.865
Report to Court	74-75		3054	1718	51	4823	1.4%	35.6%	63.3%	11.4%	0.840
Report to Court	75-76		2951	1761	48	4760	2.5%	37.0%	62.0%	12.0%	0.830
OCR	76-77		2917	1723	51	4691	-2.2%	36.7%	62.2%	11.9%	0.831
Report to Court	77-78		2809	1790	36	4635	3.9%	38.6%	60.6%	12.9%	0.826
OCR	78-79		2829	1755	64	4648	-2.0%	37.8%	60.9%	12.3%	0.831
Report to Court	79-80		2832	1688	39	4559	-3.8%	37.0%	62.1%	12.2%	0.833
OCR & Report	80-81		2803	1610	31	4444	-4.6%	36.2%	63.1%	11.7%	0.840
Report to Court	81-82		2777	1587	30	4394	-1.4%	36.1%	63.2%	12.1%	0.833
OCR & Report	82-83		2784	1501	28	4313	-5.4%	34.8%	64.5%	12.1%	0.825
Report to Court	83-84		2795	1534	28	4357	2.2%	35.2%	64.1%	12.4%	0.822
Report to Court	84-85		2829	1420	23	4272	-7.4%	33.2%	66.2%	12.0%	0.824
Report to Court	85-86		2906	1415	24	4345	-0.4%	32.6%	66.9%	12.5%	0.808
Report to Court	86-87		3131	1498	29	4658	5.9%	32.2%	67.2%	13.1%	0.789
Report to Court	87-88		3153	1528	30	4711	2.0%	32.4%	66.9%	12.9%	0.793
Report to Court	88-89		3181	1478	35	4694	-3.3%	31.5%	67.8%	13.3%	0.780
Report to Court	89-90	C.D.	3202	1392	22	4616	-5.8%	30.2%	69.4%	14.5%	0.761
CCD	90-91		3202	1280	17	4499	-8.0%	28.5%	71.2%	13.9%	0.765
CCD	91-92		3230	1318	23	4571	3.0%	28.8%	70.7%	15.3%	0.738
OCR	92-93	C.D.	3186	1304	38	4528	-1.1%	28.8%	70.4%	14.8%	0.747
Report to Court	93-94		3177	1255	38	4470	-3.8%	28.1%	71.1%	15.8%	0.716
Report to Court	94-95		3178	1233	32	4443	-1.8%	27.8%	71.5%	16.5%	0.698
Report to Court	95-96	C.D.	3086	1180	38	4304	-4.3%	27.4%	71.7%	16.4%	0.686
CCD	96-97		3112	1170	41	4323	-0.8%	27.1%	72.0%	15.7%	0.695
CCD	97-98		3049	1157	37	4243	-1.1%	27.3%	71.9%	15.0%	0.729
Report to Court	98-99		2910	1103	35	4048	-4.7%	27.2%	71.9%	14.9%	0.732
Report to Court	99-00		2806	1057	41	3904	-4.2%	27.1%	71.9%	14.7%	0.735

Table 1-1

Data Source	Year	Plan	Black	White	Other	Total	Enroll Change	% White	% Black	Deseg. Indices	
										IEb	Db
CCD	00-01		2771	1114	43	3928	5.4%	28.4%	70.5%	15.1%	0.735
CCD	01-02		2660	1103	51	3814	-1.0%	28.9%	69.7%	15.0%	0.732
Report to Court	02-03		2518	1114	64	3696	1.0%	30.1%	68.1%	15.3%	0.731
Report to Court	03-04		2474	1087	50	3611	-2.4%	30.1%	68.5%	15.2%	0.731
Report to Court	04-05		2393	1123	53	3569	3.3%	31.5%	67.0%	16.5%	0.700
Report to Court	05-06		2385	1094	71	3550	-2.6%	30.8%	67.2%	17.2%	0.669
Report to Court	06-07		2376	1096	84	3556	0.2%	30.8%	66.8%	17.1%	0.669
Report to Court	07-08		2329	1098	95	3522	0.2%	31.2%	66.1%	17.5%	0.661
Report to Court	08-09		2349	1019	99	3467	-7.2%	29.4%	67.8%	17.8%	0.641
Report to Court	09-10		2354	1032	105	3491	1.3%	29.6%	67.4%	18.7%	0.623
Report to Court	10-11		2301	1047	115	3463	1.5%	30.2%	66.4%	20.9%	0.564
School District	11-12		2512	1107	115	3734	5.7%	29.6%	67.3%	21.3%	0.517

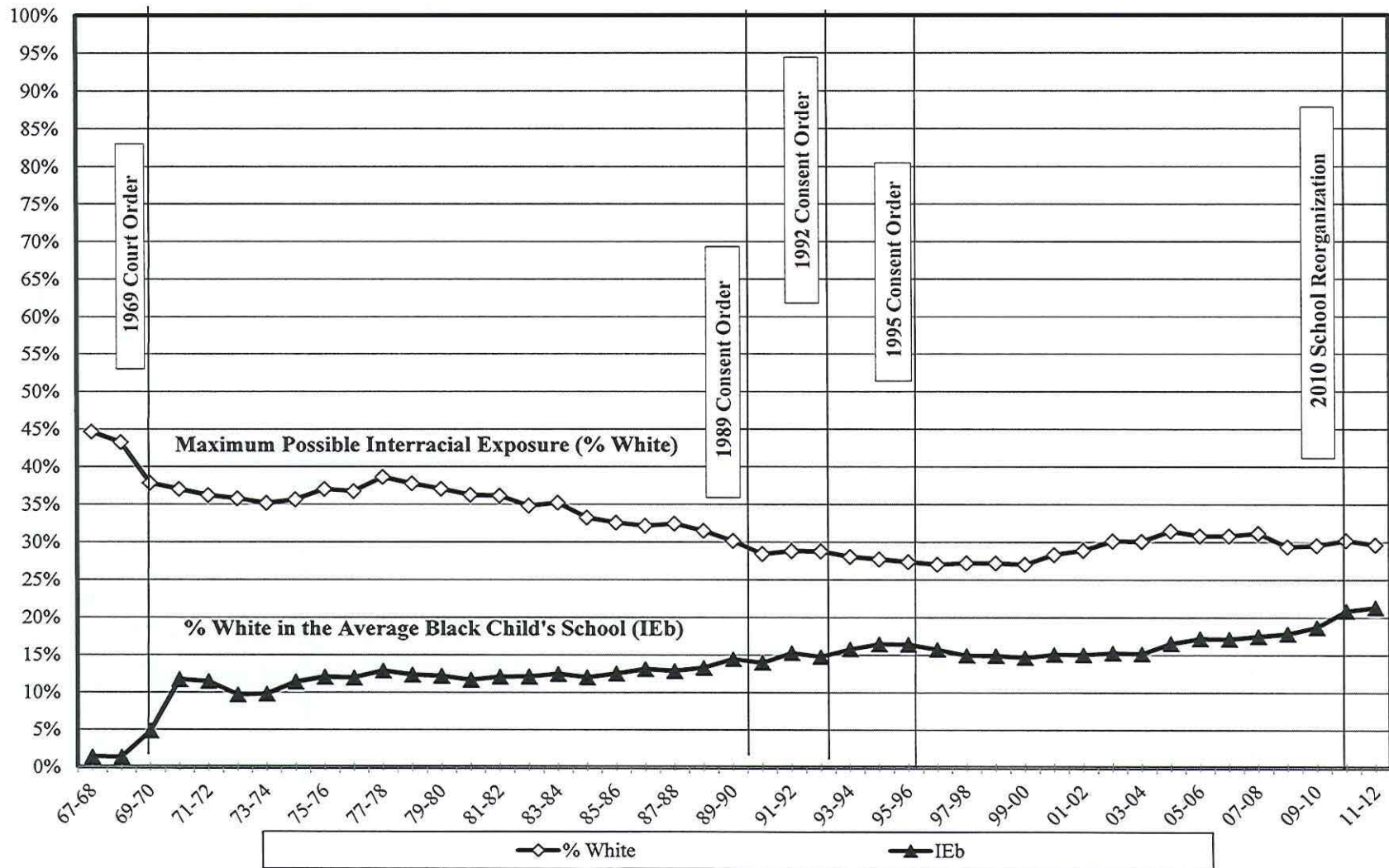
**KEY:**

IEb = Interracial Exposure -- the % white in the average black child's school.

Db = Racial Imbalance -- 100 is complete segregation; 0 is perfect racial imbalance.

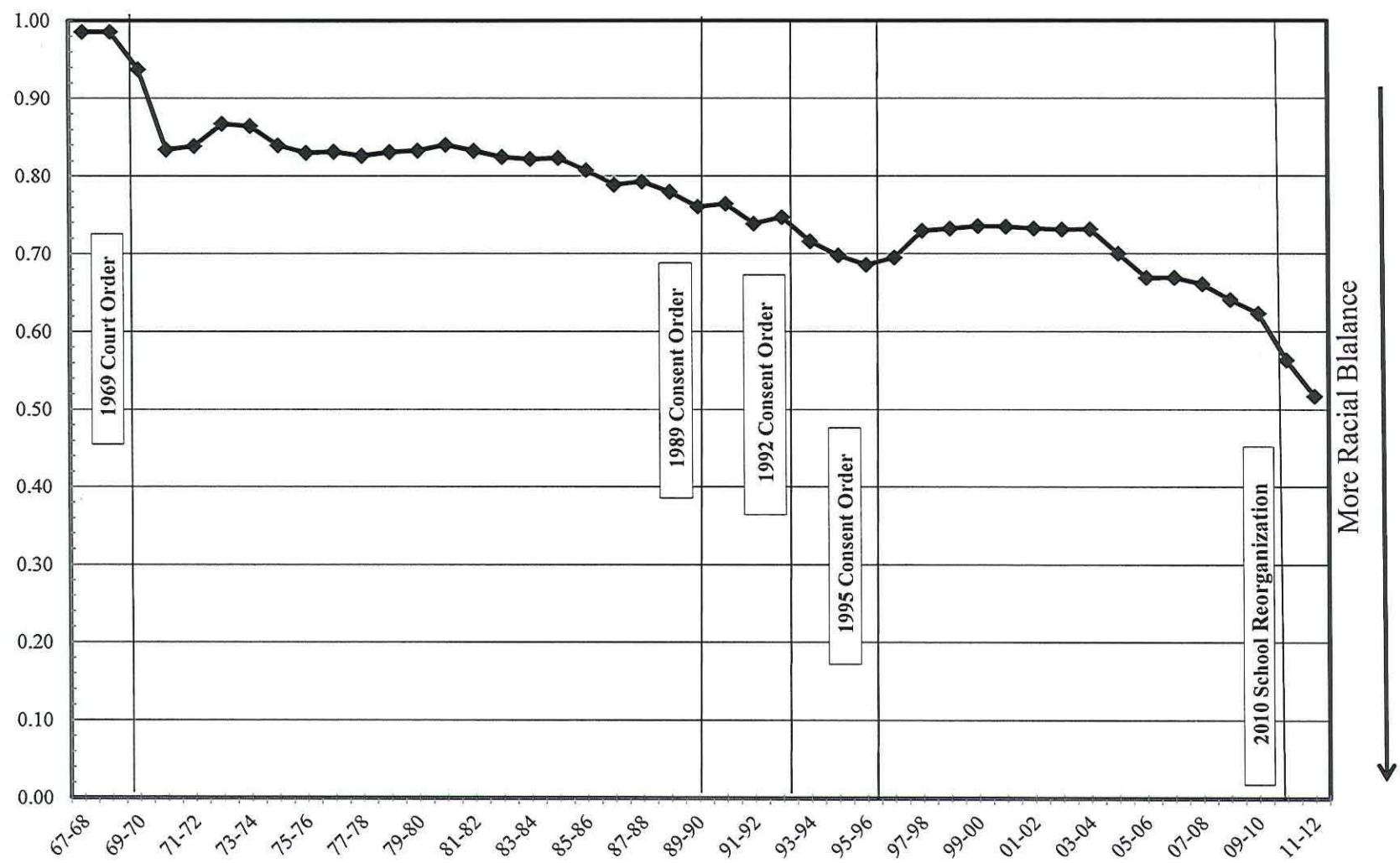
Table 1-2

**Figure 1**  
**Interracial Exposure (IEb) and % White in the Cleveland School District,**  
**1967-68 through 2011-12**

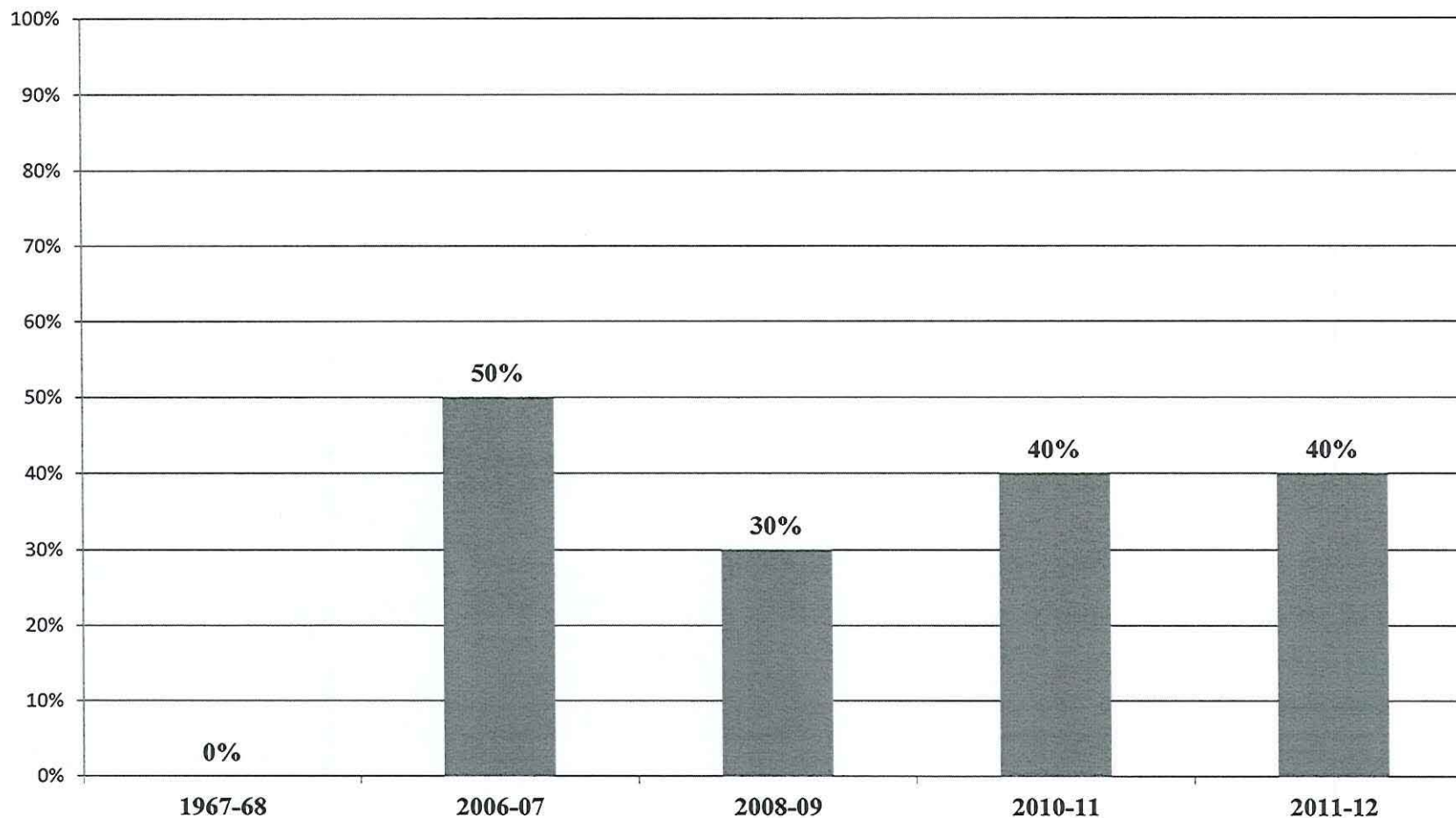




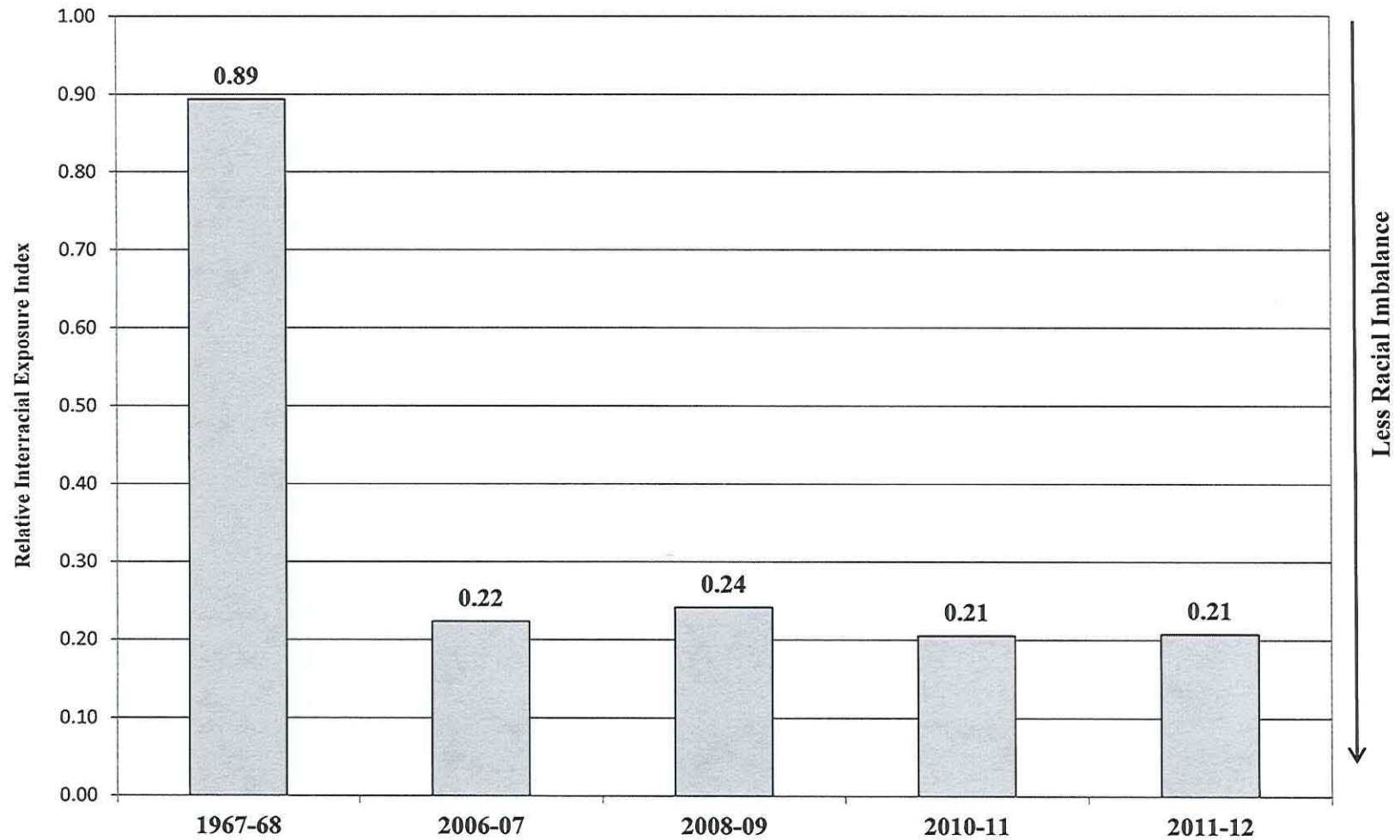
**Figure 2**  
**Trends in Racial Imbalance, Cleveland School District,**  
**Fall 1967-68 to 2011-2012**



**Figure 3**  
**Percentage of Schools with Instructional Staff Within +/- 15% Points of School Level %**  
**White,**  
**Cleveland School District, MS,**  
**Selected Years**



**Figure 4**  
**Level of Racial Imbalance (Rbw) in Instructional Staff,**  
**Cleveland School District, MS,**  
**Selected Years**





**Appendix 1**  
**Christine H. Rossell**  
Curriculum Vita

5-7-12

**ADDRESS:**

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**EDUCATION:** Ph.D., Political Science, University of Southern California, January 1974;

M.A., Political Science, California State University, Northridge, June 1969;

B.A., International Relations (area specialization: Latin America), UCLA, June 1967.

**FIELDS OF CONCENTRATION:** Public policy; public policy analysis; school desegregation and educational policy; racial discrimination in student and teacher/staff assignment, transportation, student discipline, extracurricular activities, facilities, and employment; bilingual education; urban politics and policy; methodology. Dissertation: "The Electoral Impact of School Desegregation in 67 Northern Cities," University of Southern California, 1973.

**ACADEMIC POSITIONS**

**Boston University, Political Science Department, 1975-present**

Professor, 1989-present (Maxwell Chair in U.S. Citizenship); Associate Professor (tenured), 1982-1989;

Assistant Professor, 1975-1982.

Administrative Responsibilities: Director of Graduate Studies, 2007-2008; Director of Undergraduate Studies, 2006-2007, 1985-1992; Chair, 1992-1995; Assistant Chair, 1982-1985.

**Public Policy Institute of California, Visiting Fellow, Jan. 1-June 1, 1999.**

**University of Canberra (Canberra, Australia)**

(formerly CCAE), Visiting Lecturer, Fall 1985.

**University of California, Berkeley, Graduate School of Public Policy**

Visiting Assistant Professor, Jan. - June 1981.

**Duke University, Institute of Policy Sciences**

Visiting Assistant Professor, 1977-78.

**University of Maryland, College Park**

Research Associate, Bureau of Governmental Research; Lecturer, Institute for Urban Studies; 1974-75.

**Pitzer College (the Claremont Colleges, Claremont, Calif.)**

Assistant Professor, Political Studies, 1973-74.

**Johns Hopkins University**

Research Assistant, Prof. Robert Crain, Center for Metropolitan Planning and Research, 1972-73.

**ACADEMIC AWARDS AND RESEARCH GRANTS**

Who's Who in America, 1995-present; Who's Who in the World, 1995-present; Who's Who in American Education, 1994-present.

Dean's Award for Outstanding Teaching, College of Arts and Sciences, Boston University, 2000.

One of 50 individuals listed in Jeffrey Rafter, the *Historical Dictionary of School Segregation and Desegregation: the American Experience*. Westport, Ct.: Greenwood Press, 1998.

Fellowship, Public Policy Institute of California, San Francisco, CA, Jan. 1-June 1, 1999.

Research Grant with Keith Baker, "Bilingual Education Reform in Massachusetts," Pioneer Institute, 1992-95.

Research Grant with Keith Baker, "Bilingual Education as a Civil Rights Policy," Smith Richardson Foundation, 1991-92.

Research Grant, "Magnet Schools and Issues of Public School Desegregation, Quality, and Choice," (contract LC 90043001) awarded to American Institutes for Research by the Department of Education, subcontracted to me as co-principal investigator, 1990-93.

Research Grant, "The Effectiveness of Desegregation Plan Characteristics in Producing Interracial Exposure," funded by the Department of Education, 1987-88.

Research Grant, "The Long-Term Impact of Magnet Schools as Desegregation Tools," funded by the National Institute of Education, 1983-1985

Research Grant with Willis Hawley and others, "Assessment of Current Knowledge About the Effectiveness of School Desegregation Strategies," funded by the National Institute of Education, 1979-81.

Abt Associates award for the best essay on social policy, 1979.

Research Grant with J. Michael Ross, "The Long-Term Effect of Court-Ordered School Desegregation on White Withdrawal from Central City Public School Systems: the Case of Boston, 1974-79," funded by the Ford Foundation and the Carnegie Corporation, 1978-79.

Research Grant, "The Social Impact of School Desegregation," funded by the National Institute of Education, 1973-76.

Graduate School Awards: Haynes Foundation Graduate Research Fellowship, 1972-73; Teaching Fellowship, Political Science Dept., 1970-72; University Grant, 1971; Graduate Tuition Award, 1970; University of Southern California.

## PUBLICATIONS

### Books

Christine H. Rossell, David J. Armor, and Herbert Walberg, (eds.) School Desegregation in the 21st Century, Westport, Ct.: Praeger Publishers, 2002.

Christine H. Rossell and Keith Baker, Bilingual Education in Massachusetts: the Emperor Has No Clothes. Boston, MA: Pioneer Institute, 1996.

- **Chapter 3** reprinted in Nicholas Capaldi, Immigration: Debating the Issues. (Amherst, N.Y.: Prometheus Books, 1997)

Christine H. Rossell, The Carrot or the Stick for School Desegregation Policy: Magnet Schools vs. Forced Busing. (Philadelphia: Temple University Press, 1990).

Christine H. Rossell and Willis D. Hawley (eds.). The Consequences of School Desegregation. (Philadelphia: Temple University Press, 1983).

Willis D. Hawley, Robert L. Crain, Christine H. Rossell, Janet Schofield, Janet Eylor, and others. Strategies for Effective Desegregation. (Lexington, Ma.: Lexington Books, 1983).

### Journal Articles, Book Chapters, and Monographs (technical reports in subsequent section)

"Does Bilingual Education Work? The Case of Texas." [Monograph] Austin, TX: Texas Public Policy Foundation, 2009. [76]

"The Legal Aspects of Magnet Schools" in M. Berends, M.G. Springer, D. Ballou, and H.J. Walberg, Eds.



The Handbook of Research on School Choice, Hillsdale, New Jersey, Lawrence Erlbaum Associates, 2009. [75]

"Disordered Data and Murky Models: a Critique of Wayne P. Thomas and Virginia P. Collier, 'A National Study of School Effectiveness for Language Minority Students' Long-Term Academic Achievement, Center for Research on Education, Diversity and Excellence, 2002," [monograph] Arlington, VA: Lexington Institute, 2008. [74]

"Bilingual Education," "Education Reforms: Magnet Schools," and "English as Second Language (ESL)" (3 entries) in M. E. Rushefsky, Ed. Encyclopedia of Issues in U.S. Public Policy, Farmington Hills, MI: Gale/Cengage Learning, 2008. [73]

"Segregation/Resegregation," "Zoning," and "Magnet Schools," [3 entries] in G. McCulloch and D. Crook, Eds. The International Encyclopedia of Education. Oxfordshire, United Kingdom, Routledge, 2008. [72]

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\* with Julia Kuder, "Meta-Murky: a Rebuttal to Recent Meta-Analyses of Bilingual Education," in Janina Soehn, Ed., The Effectiveness of Bilingual School Programs. Berlin, Germany, Wissenschaftszentrum Berlin für Sozialforschung (WZB), 2005, pp. 43-76. [70]

"Making Uneven Strides: State Standards for Achieving English Language Proficiency Under the No Child Left Behind Act," September 2005, [monograph] Arlington, VA.: Lexington Institute. [69]

"Whatever Happened to Magnet Schools?" Education Next, 5(2) Spring 2005: 44-49. [68]

"Learning a Second Language Through a Second Language," Educational Leadership, Dec. 2004/January 2005: 32-36. [67]

"Brown and Its Impact on Schools and American Life, Focus on Law Studies, 19(2), Spring 2004, 1-19. [66]

"The Evolution of School Desegregation Plans Since 1954" in Stephen Caldas and Carl Bankston (eds.), The End of School Desegregation? pp. 51-72. New York: Nova Science Publishers, 2003. [65]

"The Near End of Bilingual Education," Education Next, vol. 3(4), Fall 2003: 44-52. [64]

"The Desegregation Efficiency of Magnet Schools," Urban Affairs Review (formerly Urban Affairs Quarterly), vol. 38, May 2003: 697-725. [63]

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\* I am first author.

\*with David J. Armor, "Attitudes on Race and Desegregation," in Rossell, Armor, and Walberg, (eds.), School Desegregation in the 21st Century, pp. 291-322. Westport, Ct.: Praeger Publishers, 2002. [58]

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with David J. Armor, "Desegregation and Resegregation in the Public Schools," in Abigail Thernstrom and Stephen Thernstrom, Beyond the Color Line, pp. 219-258. Palo Alto, CA: Hoover Institution Press, 2002. [56]

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with Robert Crain, "Catholic Schools and Racial Segregation" in Public Values, Private Schools, Neal Devins (ed.). (Stanford: Falmer Press, 1989). [34]

"How Effective are Voluntary Plans with Magnet Schools?" Educational Evaluation and Policy Analysis, 10 (4), 1989, 325-342. [33]

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- "School Desegregation and White Flight," Political Science Quarterly, 92, Winter 1975-76, 675-696; [4]
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"Measuring School Desegregation," Chapt. 12 in Political Strategies in Northern School Desegregation, D.J. Kirby, T.R. Harris, R.L. Crain, and C.H. Rossell (Lexington, Ma.: Lexington Books, 1973) pp. 171-203. [2]

\*With Robert L. Crain, "Evaluating School Desegregation Plans Statistically," [monograph] (Baltimore, Md.: The Johns Hopkins University Center for Metropolitan Planning and Research, 1973). [1]

#### Book Reviews

Joshua M. Dunn, Complex Justice: the Case of Missouri v. Jenkins, Chapel Hill: the University of North Carolina Press, in Political Science Quarterly, 123 (4), Winter 2009-2010, 764-765. [10]

Lorraine M. McDonnell, P. Michael Timpane, and Roger Benjamin (Eds.) Rediscovering the Democratic Purposes of Education. Lawrence, Kansas. The University Press of Kansas, 2000 in American Political Science Review, 96 (02) June 2002, 429-430. [9]

Steven Taylor, Desegregation in Boston and Buffalo: the Influence of Local Leaders, (Albany, N.Y.: The State University of New York Press, 1998, in American Political Science Review, June 2000. [8]

Ronald P. Formisano, Boston Against Busing: Race, Class, and Ethnicity in the 1960s and 1970s (Chapel Hill and London, The University of North Carolina, 1991 in Political Science Quarterly, 107, Fall 1992, 558. [7]

Mark A. Chesler, Joseph Sanders, and Debra Kalmuss, Social Science in Court (Madison: The University of Wisconsin Press, 1988) in Contemporary Sociology, 19 (2), March 1990, 263-264. [6]

Charles V. Willie, School Desegregation Plans That Work (Westport, CT.: Greenwood Press, 1984) in Contemporary Sociology 14, May 1985, 392-394. [5]

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"The Effectiveness of Alternative Desegregation Plans for Hattiesburg, Mississippi," a report to the U.S. Department of Justice in the case of U.S. and Pittman v. Mississippi and Hattiesburg Municipal School District, March 21, 1985. [14]

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"What Is Attractive About Magnet Schools?" a report to the U.S. Department of Justice, March 15, 1984.[12]



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"Statistical Measures of Effective Net Reduction in Segregation," a memo to Shirley McCune, Associate Commissioner of Equal Educational Opportunity, Office of Education, February 1980. [8]

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"Monitoring Report of the Boston Public School System," prepared for the U.S. District Court by the Citywide Coordinating Council, August 1977. [5]

Reports to the Court in Carlin v. San Diego Unified School District, 1977, 1979; [3, 4]

Report to the Court in Seattle School District No. 1 v. State of Washington, 1979 [2]

Report to the Court in U.S. v. Port Arthur Independent School District, 1979. [1]

#### PROFESSIONAL ACTIVITY

Advisory Board, READ, Washington, D.C., 1999-2000.

Advisory Board, Center for Equal Opportunity, Washington, D.C. 1996-1999

Advisory Board, U.S. Commission on Civil Rights study on school desegregation, 1986-1987 (Welch and Light, "New Evidence on School Desegregation").

Member, The National Review Panel on School Desegregation Research, an 11 member panel of experts funded by the Ford Foundation, 1977-1980; Participant, "Ethics and Public Policy: Social Inquiry" project sponsored by the Hastings Center Institute of Society, Ethics and the Life Sciences, 1979-80; Article reviewer for The American Political Science Review, American Journal of Political Science, Urban Affairs Quarterly, Social Science Quarterly, Sociology of Education, American Politics Quarterly; Review of Education Research; Member, American Political Science Association; American Educational Research Association.

#### PUBLIC SERVICE

Member of the Massachusetts Bilingual Advisory Council, 2000-03.

Co-Chair of "English for the Children," (Question 2) Campaign, Massachusetts, passed November 5, 2002.

Member of the Citywide Coordinating Council of Boston, 1976-77, a 15 member body appointed by Judge W. Arthur Garrity to monitor school desegregation and minority sub-committee representation. I was on the working sub-committee which helped develop and train the nine parent-citizen community district councils in Boston.

#### CONSULTING [numbers reflect court litigation]

Office of the Attorney General, State of Arkansas, Jan. 2012 -present, analysis of charter school transfers in Little Rock School District in the case of Little Rock School District v. Pulaski County Special School District, et al., Mrs. Lorene Joshua, et al., Interveners, Katherine W. Knight, et al. Interveners. [73]



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Office of the Attorney General, State of Arkansas, student discipline analysis, in the case of *Little Rock School District v. Pulaski County Special School District No. 1, et al. and Joshua Interveners*, 2009-present [68]

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Office of Legal Services, school desegregation issues, Louisiana Department of Education, 2008-09. [66]

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State of Nebraska in the case of Douglas County School District 001 A/K/A Omaha Public Schools et al. v. Dave Heineman, et al., 2007-2008 [64]

Louisville Municipal School District, Mississippi, in the case of U.S. v. Louisville Municipal Separate School District, et al., 2006-07. [63]

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Stockton Unified School District, in the case of Hernandez v. Stockton Unified School District, 2003. [54]

State of California in the case of Williams v. State of California, 2002-03. [53]

Magnet Program Expert Panel, Prince George's County, Maryland in the case of Vaughns v. Prince George's County (Maryland), 2002. [52]

Fulton County (Georgia) School District in the case of Hightower et al. v. West et al., 2001-2003. [51]

Citizens for the Preservation of Constitutional Rights in the case of Comfort v. Lynn and Commonwealth of Massachusetts and Bollen v. Lynn, 2002. *[includes Court Testimony]* [50]

State of Ohio, in the case of Brinkman v. Gilligan, 2001-02 [49]

Kansas City, Missouri School District in the case of Jenkins v. Missouri, 2000-01. *[includes Court Testimony]* [48]

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Natchez-Adams (Mississippi) School District in the case of U.S. and Nichols v. Natchez Special Municipal Separate School District, 2000-03. [46]

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State of Minnesota on state desegregation rule, 1998-1999. [40]

State of Connecticut, Office of the Attorney General, in the case of Sheff v. O'Neill, 1990-91, 1998, 2002 *[includes Court Testimony]* [39]

Orange Unified School District, in the case of Quiroz, et al. v. State Board of Education, et al., 1997. *[includes Court Testimony]* *[bilingual]* [38]

State of Ohio and the Cleveland School District, in the case of Reed v. Rhodes, 1997-1998. *[includes Court Testimony]* [37]

Court-Appointed Expert to Federal District Court Judge Peter Messite, in the case of Vaughns v. Prince George's County (Maryland), 1996-1997. *[includes Court Testimony]* [36]

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Robla School District, Sacramento County, CA, in the case of Robla School District v. California State Board of Education, 1992. [26]

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East Side High School District, San Jose, CA, in the case of Honig et al. v. East Side Union High School District, 1992. [25]

Duval County, Florida Public Schools, Fall 1991.

Knox County Public Schools, Knoxville, TN, in the case of Middlebrook v. School District of the County of Knox, Tennessee, Jan. 1991-92. *[includes Court Testimony]* [24]

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Angeles, CA., June 1985-1987; System Development Corporation, Santa Monica, CA., Sept. 1984-May 1985; testimony at hearings, June 11, 1987.

The Laurel Amici, Vaughns v. Board of Education of Prince George's County, May-June 1985. [13]

Fort Wayne Community Schools, consultant to the school district on a magnet school plan, 1986.

The U.S. Department of Justice, U.S. and Pittman v. Mississippi and Hattiesburg Municipal School District, 1985-1986, and 1998. [includes Court Testimony, 1986] [12]

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Court-appointed expert, U.S. v. Marion County, (Florida), 1983-1984. [10]

Mediator for Community Relations Service, U.S. Department of Justice, in Little Rock School District v. Pulaski County, Special School District, et al., 1983. [9]

The U.S. Dept. of Justice, Davis and U.S. v. East Baton Rouge Parish School District, 1982-83. [8]

Contributor to the legal brief presented by the Legal Defense Fund, Inc. to the Supreme Court on behalf of Crawford v. Board of Education of Los Angeles, and Seattle School District v. the State of Washington, Feb. 1982. [7]

Expert witness, Committee on the Judiciary, Subcommittee on Civil and Constitutional Rights, U.S. House of Representatives, Washington, D.C., September 23, 1981.

Expert witness for and consultant to the U.S. Dept. of Justice, U.S. v. Port Arthur Independent School District, 1980. [includes Court Testimony] [6]

Educational Policy Center, Duke University, conducting a meta-analysis of research studies on community reaction to school desegregation and issues of resegregation, interviewing in several cities, and co-authoring the final report on the effectiveness of desegregation strategies, 1979-80.

Educational Policy Center, Institute of Policy Sciences, Duke University, interviewing and providing information on court appointed advisory monitoring panels, 1979-80.

Member of the Advisory Board for the Associate Commissioner of Equal Educational Opportunity Programs (Shirley McCune), 1980.

Training Equal Educational Opportunity Program staff (HEW) on the causes and consequences of white flight and policy options, October 17-18, 1979.

Plaintiffs' expert witness, Crawford v. Board of Education of Los Angeles, 1979-80. [includes Court Testimony] [5]

Educational Policy Development Center - Desegregation, Institute of Policy Sciences, Duke University, 1979-80.

The U.S. Dept. of Justice, Ross v. Houston Independent School District, June 1979. [4]

Plaintiffs' expert witness, Seattle School District No. 1 v. the State of Washington, April - May 1979. [includes Court Testimony] [3]

The U.S. Dept. of Justice, Liddell v. Board of Education of St. Louis, Mo., March 1978. [2]

Plaintiffs' expert witness, Carlin v. San Diego Unified School District, January 1977, 1979. [includes Court Testimony] [1]



Abt Associates, writing a research proposal to study magnet schools as a desegregation tool, May-June 1977; analyzing data, Summer 1978.

Rand Corporation, designing questionnaire to collect data on school desegregation actions in a national sample, 1976-77.

Office of Education, panel reviewing public service grants and fellowship applications, Spring 1975; Spring 1976; and Spring 1977.

Rand Corporation, Winter 1973-74, longitudinal design to study school desegregation.

**DESEGREGATION PLAN DESIGN ASSISTANCE:** Prince George's County, MD, 2002; Baton Rouge, LA (1983 & 1996); Knox County, TN (1991); Ocean View, CA (1990); Stockton, CA (1989); Natchez, MS (1988); San Jose, CA (1986); Yonkers, NY (1986); Savannah-Chatham County, GA (1986); De Kalb, GA (1986); Marion County, FL (1983).

**PARENT SURVEYS CONDUCTED:** Hattiesburg, MS (1998); Rockford, IL (1995); Knox County, TN (1991); De Kalb, GA (1990); Stockton, CA (1990); Topeka, KS (1990); Natchez, MS (1988); Yonkers, NY (1986); Savannah-Chatham County, GA (1986).

**AFFIDAVIT**

**STATE OF MASSACHUSETTS  
COUNTY OF NORFOLK**

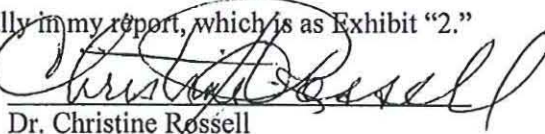
PERSONALLY APPEARED BEFORE ME, the undersigned, who, after being duly sworn on oath did depose and state as follows:

1. My name is Dr. Christine Rossell. I am over the age of twenty-one (21) years, am of sound mind and am in all respects competent to give testimony under oath. I am a Professor of Political Science at Boston University, One Silber Way, Boston, MA 02215. I reside at 44 High Street, Brookline, MA 02245.

2. I teach and conduct research in the areas of public school desegregation and education policy.

3. The opinions offered in this case are based upon my experience, education, research, training, and expertise in the field of school desegregation as set out in detail in my curriculum vitae which is attached as Exhibit "1." My opinions are also based upon my review of the pleadings, court orders, and demographical data in this case.

4. My opinions are described fully in my report, which is as Exhibit "2."

  
Dr. Christine Rossell

SWORN TO AND SUBSCRIBED before me on this the 15<sup>th</sup> day of May 2012.

  
NOTARY PUBLIC

My Commission Expires:

