



October 30, 2014

Mr. Robert Henry
School and College Legal Services
5350 Skylane Blvd
Santa Rosa, CA 95403

RE: ROSS VALLEY SCHOOL DISTRICT/MANOR SCHOOL MATTER

Dear Mr. Henry:

On August 27th, 2014, [REDACTED], a parent at Manor Elementary School, filed a complaint of discrimination with the Ross Valley School District. [REDACTED] alleged that since 2006, the Multi-Age Program (hereinafter referred to as "MAP") operated at Manor School, discriminated against protected classes of children, including children with IEP's, English Language Learners (ELL), and gender.

MAP is a District-wide, multi-age program for K-5 students. A governing Advisory Board consists of six parents, three teachers, and the Principal at Manor Elementary School.

ELL

An alleged requirement for "parent participation" created a "self-selecting group of socioeconomically advantaged children." [REDACTED] alleged that the requirement of parent participation discriminated against ELL children because those parents did not speak English. It was alleged that a parent who could not speak English would be unable to participate in the classroom with students and volunteers. MAP documentation on the District website and on the private MAP website had no literature printed in Spanish.

IEP

[REDACTED] alleged that during the 2013/2014 school year, one IEP student that was number one on a MAP waiting list to enter the program was not selected when the Principal of Manor selected a lower priority wait list student. The Principal allegedly failed to contact the parents of the IEP student

at the top of the list to make a determination whether or not the parents wanted their child placed in the program.

GENDER

MAP has been a gender-balanced program since its inception. It was alleged the gender balancing led to an unequal number of boys and girls in other Manor K-5 classes. [REDACTED] alleged that although the practice was officially terminated by the Ross Valley School Board last year, gender balancing continued to be "functional" in the 2014/2015 school year.

[REDACTED] provided statistical information she received from the Ross Valley School District to demonstrate a disparity between MAP students and other socioeconomically disadvantaged students, ELL and IEP students from Manor.

[REDACTED] asked that the District evaluate the MAP and make any and all appropriate changes to ensure the program did not discriminate against children in protected classes.

WITNESS INTERVIEWS

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]

EVIDENTIARY DOCUMENTS

- Historical MAP Documents
- MAP Handbooks, Version 2003 and 2012
- MAP admission documents prepared beginning in 2013
- Volunteer Program Document
- Statistical data through 2011 through 2014 breaking down the demographics of Manor School, the MAP and the District
- MAP Advisory Board Agendas, Minutes and Notes
- MAP Bank Account Information
- Pending Charter School Application by supporters of the MAP
- E-mail Correspondence between Parents/Staff of Manor Elementary School and the Ross Valley Unified School District Administrators

MAP was founded based on a requirement that parents participate in the program as volunteers. Volunteerism is and was an integral part of MAP. For many years, parents were expected to volunteer in MAP at least two hours per week. The early MAP Handbooks and Questionnaires that were signed by applicants, acknowledged that a requirement of entry into the program was a commitment to volunteer eight hours per month for the MAP. The documents requiring volunteer service were in use until at least 2003/2004. There were no records to indicate when the written requirement of volunteering was ended or modified. The literature of the program always outlined an expectation of volunteering in MAP. One of the MAP "philosophies" was that gender balancing was a "primary goal." The documentation produced for the MAP clearly identified the necessity of parent involvement in the program. Active family participation was characterized in one form as "critical" to achieving the MAP goals.

One criteria of acceptance to MAP was a required "interview" or consulting meeting with the parents and the K-1 teacher(s). The stated purpose of the in the original handbook and guidelines was to determine whether or not the parents' expectations were aligned with the MAP philosophies.

MAP historically required early registration by families to be considered for MAP. One reason given by staff for the early registration was to allow families considering a private school the opportunity to apply for the MAP before they had to put up a deposit for a private school. MAP claimed that there was a period of time when enrollment was declining and the District

wanted to attract students considering private schools. In order to accommodate that request, MAP moved its deadlines in advance of the time other parents would consider registering their children in the Manor School. Declining enrollment is no longer an issue at Ross Valley School District. The lottery selection date effectively prohibited a family unfamiliar with the dates or a family who moved to the District after March 1st, from becoming eligible for the lottery process. Families moving to the District or completing registration forms after March 1st, or after the early registration, had their children placed at the bottom of a wait list.

Since 1996, the District and MAP supported a gender equity program for MAP. Students were always selected to gender balance classes, regardless of that impact on the Manor classes. The net effect of the gender equity program caused imbalances in the boy/girl ratios for Manor Elementary School. Although MAP is considered a District-wide program, the majority of students in the program come from the Manor Elementary School area (over 80%). Last year twenty-two students transferred from other district elementary schools to Manor School. On average, each MAP class had three to four non Manor students.

ENTRY TO MAP- LOTTERY

Since 1996, the method in which a child was selected for the MAP was handled through a lottery held at the site by the K-1 teacher of MAP and a site employee. The District had little to no oversight of the lottery until the 2012/2013 school year. The District and MAP had exceptions (priority lists) that allowed students to be placed in MAP without the need to enter a lottery. The criteria included founding members of MAP, siblings of children, regardless of whether or not they were still attending Manor School, and teachers from the District. For the first twelve years, the MAP lottery was conducted in the presence of the site Principal, the school secretary and the K-1 teacher(s). The list was maintained by the secretary and was not distributed to parents, teachers, or the MAP Advisory Board. The questionnaire and form regarding required volunteering was used by MAP until at least 2005 and possibly beyond that date. The former school secretary maintained updates to the MAP handbook, but she could not recall when the mandatory volunteering was modified.

In 2011, the MAP Advisory Board voted to modify the priority list for entry into the program by giving top priority to current MAP teachers. All other staff, including teachers or staff at the Ross Valley School District, were not included in this priority group. The new policy (adopted in 2011) was approved by the Advisory Board for MAP. The Principal of Manor School (Jason Richardson) objected to the new policy to his supervisor. When Mr. Richardson spoke with his supervisor (former Superintendent), no action was taken. The new policy was not formally approved by the Ross Valley School District Board of Trustees or the Superintendent of the District.

A review of the MAP Board minutes from 2011-2014 indicated there were ongoing discussions about the enrollment policies, its transparency, and the ambiguity the policy had with the priority groups. Once document indicated there were changes to the enrollment policies that were voted on in 2009 that were never published by the MAP Advisory Board. The MAP Advisory Board minutes from November 3, 2011 listed a "straw man proposal from voting Board members on priority groups which listed priority group number one as children of current MAP teachers (contingent upon enrollment status approval within Ross Valley School District)." MAP Board minutes also indicated MAP wanted to change the priority list for MAP teachers in order to continue to "recruit and retain teachers that embraced the values MAP and that teachers who joined the District want to have their children at the same campus." The new policy eliminated other teachers from having priority on the priority list.

The District had a practice of including a MAP application in the registration packets for incoming kindergarten students. The MAP application was not included in registration packets for incoming students for grades 1-5. Although there were wait lists for 1-5 students, families would need to know about MAP via the website, or word of mouth to get on a wait list after kindergarten.

One parent interviewed as part of the investigation, noted that two MAP teachers had children eligible to enter the program immediately after the priority policy was changed. There was a perception in the community that MAP could manipulate its priority lists to suit the needs of teachers or parents within the program. When questioned about the new policy, one MAP teacher said it was made because two MAP teachers had children eligible to join MAP. That type of policy change, designed to impact a few employees of the District, was

further evidence that could lead non-MAP families to believe MAP was going to pick the students it wanted to pick and it would change its policies whenever necessary to accomplish those goals.

The current priority list gives MAP teachers a benefit other teachers within the District are not afforded. A teacher and colleague at Manor School would not be given a priority to have their child participate in MAP. The priority for MAP teachers was not part of a collective bargaining process.

The District and MAP used a strict gender-based selection process for entry into the program until it was slightly modified for the 2014/2015 school year. Students would be selected and placed into the program based on the need to have an equal number of boys and girls in each class at the same time. A male student at the top of the list might not be the first student selected if there was an imbalance of girls in a particular class.

Regular Manor K-5 classes had no gender balancing of classes. The criteria of gender balancing for MAP created unbalanced classes for K-5 grade levels at Manor School. In 2013, the District was advised by its legal counsel that gender balancing was prohibited by law. The Ross Valley School District agreed to change its practices beginning with the 2014/2015 school year. The District adopted a policy of using a lottery that randomly selected students without regard to their gender. Rather than use a boy/girl criteria to populate classes, the District required that students be selected from a master list and those names would be placed in order.

The current policy used for the District to select students included the following:

- March 1st deadline for enrollment application to MAP
- March 15th lottery for students selected in the program

The investigation disclosed that rather than eliminate the prior gender-based wait list, the District continued to use the existing wait lists that were separated by boys and girls. Students placed on the gender-based lists remained at the top of the lists when the new policy was adopted by the Ross Valley School District. When a position opened in a particular class, the Principal would select a boy and a girl for each position. If two spots opened in one class, the Principal would select two boys and two girls and place their names in a hat. The two boys and two girls were previously on the wait list

before the District was advised that gender balancing was inappropriate. The Principal would then draw two names from the hat and those students drawn would be placed in the upcoming classes. The other students would be returned to the top of the wait list for another round of picking when a new slot became available.

The District now places new students on the wait list based on the time their application is submitted to the District. The current policy benefits a family that is able to fill out their application and return it to the District ahead of other families. Even though there is a defined period of time for a family to submit an application, there is no written material that notifies a family that if their documents are turned in early, they will be given a higher spot on a wait list. A family not selected in the lottery is still at a higher priority on the wait list based on the time stamp on their application.

Mr. Jason Richardson, the former Principal at Manor School, explained that there were occasions when he was required to balance K-5 classrooms for the benefit of the entire school. In order to do that, Mr. Richardson would bypass a boy or girl at the top of the wait list (from another site) in order to help populate other classrooms. Mr. Richardson believed it was unfair that certain teachers were required to teach in classes that had unfair class sizes. At no time could a MAP student be removed from MAP to balance a Manor School K-5 class.

Another unwritten practice at the site involved parents who attempted to enroll their students at a time when those students were not ready to begin school. If a parent entered their student in a lottery and received a high lottery number, they could attempt to enter the child in the MAP. If a determination was made by the parents or the teacher that the student was not ready for that grade level, then the parent could withdraw the student from the program with a promise they would retain their same spot on the wait list. By registering the student early, a family with a high wait list position was guaranteed placement the following year, even though the family voluntarily chose to withdraw their student from the program. The practice continued without a written policy for MAP enrollment. The former school secretary recalled only one occasion when a family was asked to join MAP, turned down the request, and then reconsidered their decision. On that occasion, the Principal allowed the family to have their name at the top of the wait list. No other exceptions were noted by the former school secretary.

The policy of the MAP priority list stated that once a family was offered a placement in the program and it was rejected, that family would have to reapply and subject themselves to being placed on the wait list in the order in which they were selected.

During the investigation, teachers questioned about this practice denied ever promising a future spot to a family. The evidence did not corroborate those statements. In order to rectify the problem he discovered, Mr. Richardson started attending the parent's initial consultation (interview) with teachers to ensure no promises were made to families by the teachers.

VOLUNTEER REQUIREMENTS

One of the main complaints about discrimination centered around the MAP volunteer program. Historically, MAP "required families to volunteer" in the program eight hours per month. An application used by MAP until at least 2005 specifically identified the requirement within its registration form stating,

"MAP is a program of choice and requires a minimum of eight hours per month of volunteer time per family to meet our program's goals....by enrolling your child.....and signing this form on the line below, you are making a commitment to volunteer eight hours per month."

There was credible evidence that for the past several years, MAP criteria required volunteering as part of entry into MAP. The language regarding volunteering was changed from "requires" to an "expectation." The unintended consequence of such a policy was the reduction in applications by classes of families that believed they could not volunteer or that they did not have the types of skills that could benefit the classes. Although the former school secretary stated she was unaware of any family that was turned away due to volunteering, she recalled having to talk with teachers to emphasize that families should not be prevented from joining MAP due to that requirement. There was a concern that families would not join MAP due to the belief they had to volunteer.

The initial MAP application also had a series of questions it asked parents in a section of the application known as the "MAP Parental Resource Inventory." The inventory asked questions of both parents regarding their skills, hobbies, interests, arts, crafts, writing, audiovisual skills, music, performance art, physical education, sports, and areas of knowledge. The historical

literature on the program continually mentioned the importance of volunteering and what the parents could be expected to do in the classroom. The application form identified skills of parents, as if that were a requirement to volunteer. It is reasonable to conclude that parents with a lower skill set or education might not consider applying due to their lack of skills.

MAP modified its application form (approximately 2005) and eliminated the language that volunteering was required. Despite the change in the form, there is a perception within the community that MAP expects families to volunteer on an ongoing, regular basis. Teachers interviewed as part of this investigation strongly denied that volunteering was a requirement or an expectation of the program. However, the current application process that a parent must fill out prior to applying to the program (Ross Valley Multi-Age Program Acknowledgment of Parent Expectations), specifically states at item two,

“I/we further understand that parents are expected to contribute time inside or outside the classroom to ensure the continued success of the program.”

In addition, the document is identified as “Parent Expectations.” Whether or not the parents that are accepted into the program must volunteer, an applicant reviewing the forms could be discouraged from filling out an application if they believed there was an expectation of a time commitment. Socioeconomically challenged families and/or minority families, might not complete the application if they knew there were “expectations” placed upon them that they could not meet due to barriers of language, economics or other challenges found most commonly in those groups. Enrollment documents emphasized volunteering and the important role parents play in the classroom.

The MAP Enrollment Policy and Procedures document referenced a required parent consultation by teachers prior to the time the family was accepted into MAP. The current enrollment application that must be signed by a prospective family includes the following “...I agree to attend an introductory meeting with a MAP teacher to more fully understand the program and its expectations.”

Current staff interviewed during this investigation claimed the meeting was simply a chance for the parents and the teachers to review the details of the program and orient the families. I was told by teachers that families were

not required to attend the meeting with the teachers. A former staff person responsible for contacting parents after the lottery, stated that when a parent was advised of their selection to MAP an appointment was made to meet with the teachers. The same former staff person said that if a parent did not want to meet with the teachers, their name was removed from the list and another family was selected.

Regardless of whether or not the stated purpose was an interview/consultation or just a question and answer session, a minority family reading the expectations of the program (face-to-face interview/consult) may be more hesitant to participate in that process. Minority families may have immigration issues or communication barriers that would make a family uncomfortable participating in an interview/consulting process. Such a process could create an impression that the family would be further screened prior to the time a child is admitted to the program. A family member that does not speak English could reject the program if the family knew they had to be interviewed by an English speaking person that did not speak their language. No evidence could be found that MAP program staff spoke Spanish.

The investigation disclosed that for some period of time, the K-1 teachers were conducting meetings (referred to as interviews or consultations by witnesses) of families before the families were accepted into MAP. Comments made by parents to staff after the interview/consult meetings established that despite being selected in the lottery, parents were still screened through the interview/consulting process before they were officially accepted into the program. One parent report speaking with one of the K-1 teachers about the interview/consult process and noted a comment by a K-1 teacher about the MAP worthiness of one of the parents interviewed for MAP. The interview/consult meeting process could be perceived as a barrier to admittance to the program. The interview consultation process effectively created a subjective standard used by teachers.

The former site Principal recognized there was a problem with the parent meeting process and remedied that problem by attending the parent meetings with the teachers. The former site Principal did not report hearing questions or responses by teachers that dissuaded families from joining the program (when he was attending those meetings). The practice of promising a place on a priority wait list if a family decided not to enroll their student was also terminated once the Principal started to attend the parent/teacher meetings.

ENGLISH - SPANISH FORMS

The enrollment forms used by MAP are only written in English. Multiple requests were made to locate any forms or applications that were made available to Spanish speaking families. I reviewed the website for the Ross Valley School District and MAP. No documents could be located that would allow Spanish speaking family an opportunity to review any forms in Spanish.

On October 21, 2014, Marci Trahan and Teri Louer provided additional documentation regarding the investigation. One brochure was provided that was written in Spanish. The English version form was dated 2006; the Spanish form did not have a date for its creation. [REDACTED], the former site administrative assistant, reviewed the form during our interview and said it was a form she located on her computer at the Manor Elementary School. However, the Spanish form was never printed or distributed to any families by the administrative office person at Manor School. No registration documents could be located that were translated into Spanish for MAP.

There was evidence MAP had enrollment dates earlier than the normal registration dates for the District. Without the benefit of Spanish documents, a Hispanic family would most likely follow the normal enrollment dates for entry into the Manor School. MAP teachers explained that the enrollment dates were moved forward in order to accommodate declining enrollment. Declining enrollments at Ross Valley School District occurred approximately ten years ago and that is no longer an issue for the District.

The former school secretary stated that Spanish speaking families with questions were able to use a Spanish speaker from the site to help interpret their questions. The former secretary stated she was unaware of any minority family that wanted to join MAP that was prevented from doing so based on a lack of an interpreter at the site.

STATISTICAL INFORMATION

I reviewed statistical information from the District to compare the percentage of students in MAP with IEPs or who were English language learners (ELL). The District tracked the above student groups and was able to compile specific data for each class category. Similar information was reviewed for other elementary school sites within the District. MAP representatives maintained that it was unfair to compare the statistics for MAP only against the

Manor Elementary School enrollment figures. The argument made by MAP was that the numbers for the overall District were consistently in line with MAP.

I reviewed the number of students in MAP (2011-2015) that were populated from the three other elementary schools (Brookside, Wade Thomas and Hidden Valley). During the 2013/2014 school year, there were twenty-two students in MAP that were from the three other elementary school boundary areas. The breakdown of students was as follows:

	WADE THOMAS	BROOKSIDE	HIDDEN VALLEY
K	2	1	1
1		1	2
2	1		3
3	2	2	
4	1	1	1
5	3	1	

For the kindergarten age group, of the two hundred and forty-two students in the kindergarten programs for the District, four students from other sites were in MAP. Sixty-five students were enrolled in the Manor kindergarten program (MAP and non MAP). Of the one hundred and thirty children in MAP for the 2013/2014 school year, twenty-two were from other sites. Some of these students had a priority as siblings (less than two percent for the entire District). The evidence demonstrated the impact to the populations of the other three sites was minimal.

Based on the low number of students entering MAP from other sites, the statistical comparison using Manor school provided a fair picture of the disparity in IEP and ELL students in MAP.

For the 2014/2015 school year, ten percent of the students at Manor had an IEP plan. For MAP, five percent of students enrolled in MAP had an IEP plan. For the same time period, eight percent of all Manor students were ELL's, compared to only one percent ELL's in MAP.

For the 2013-14 school year fourteen percent of the students at Manor had an IEP plan. For MAP five percent of students enrolled in MAP had an IEP plan.

For the same time period, ten percent of all Manor students were ELL's, compared to one percent ELL's in MAP.

For the 2012/2013 school year, eleven percent of the students at Manor had an IEP plan. For MAP, six percent of students enrolled in MAP had an IEP plan. For the same time period, nine percent of all Manor students were ELL's, compared to one percent ELL's in MAP.

The above data confirmed that the ELL and IEP population was under represented in MAP by significant margins. Although there was a lack of credible evidence to support a finding of intentional discrimination, the evidence concluded that the practices and policies of MAP (volunteering, teacher interviews, no MAP forms in Spanish) were responsible for the disparate treatment of IEP and ELL students. The perceptions left in the community by the early practices related to volunteering, requirements to identify parent skills, parent-teacher consultations as a condition of acceptance and gender balancing did not create a belief MAP was inclusive and diversified. This perception continued due a lack of substantive outreach by the District and MAP.

DISTRICT OVERSIGHT

The investigation disclosed that for the past several years there was little oversight of MAP from District administrators or the Board of Trustees. Two trustees were also very active with MAP and they attended MAP Advisory Board meetings. The MAP Advisory Board meeting minutes included references to statements made by those Board members about what the overall Board of Trustees did and did not plan to do with MAP. One example of an oversight issue occurred when the MAP Advisory Board unilaterally modified the manner in which students entered MAP. Approximately four years ago, MAP made the children of MAP teachers the top priority for entry to MAP. Principal Jason Richardson was on the Advisory Board and voted against the change. Mr. Richardson wanted to reduce the types of priority lists in use in order to make the program more available to the entire community. The investigation disclosed the change was done to accommodate two teachers with children eligible for MAP.

Mr. Richardson stated during his interview that he attempted to get support from the District Superintendent and the Board of Trustees, but did not receive any responses or direction that helped him manage his site and MAP.

The investigation disclosed that Mr. Richardson left employment with the District based on his negative interactions with the MAP Advisory Board and the lack of support he received from District representatives. Mr. Richardson brought issues to his Superintendent regarding the MAP Advisory Board and the governance of the program at the site. Mr. Richardson believed the Advisory Board needed to be subservient to the wishes of the site Principal. Mr. Richardson said he attended meetings with the Advisory Board in which he was personally attacked, belittled and yelled at by parents. Mr. Richardson did not think it was appropriate for parents to have the type of control the group of Advisory Board parents had over a District-wide program.

There was evidence that on occasion, parents would discipline a student in a classroom. At least one parent objected to having a parent take any disciplinary action against their child.

From Mr. Richardson's viewpoint, the MAP Advisory Board and the program were resistant to accepting changes he wanted to implement regarding the lottery, the wait list, PTA funding and the gender-based program. The MAP Advisory Board unilaterally changed the priority list for entry into the program to allow MAP teachers the highest priority on the list for accepting children into the program. The timing of the request coincided with a desire for a MAP teacher to have their child in the program.

Mr. Richardson stated that there were meetings he attended in his role on the MAP Advisory Board when parents of former students would attend those meetings. Mr. Richardson could not understand why parents that no longer had students at the site or in the District, could attend an Advisory Board meeting and berate him for his current conduct. After much soul searching, Mr. Richardson decided it was in his best interest to leave the school. Mr. Richardson was also a parent at Manor School but chose not to have his children in MAP.

PTA FUNDING

For many years, MAP had its own fundraising efforts and separate bank accounts. The District never required MAP to provide any financial records to

the District, even though it was a District-wide program. MAP spent money for individual needs of the program, not the needs of the entire Manor School. After Mr. Richardson was hired as the Principal, an agreement was reached between the Manor PTA and MAP. Previously, MAP was using resources for children that were made available through the various fundraising efforts of the entire school. In addition, MAP had its own fundraising and kept those funds for its own program. MAP and Mr. Richardson agreed there would be no further private fundraising for MAP. MAP agreed to participate in the PTA program with the rest of the Manor School. Currently, MAP maintains a bank account of approximately eight hundred dollars. The treasurer of MAP indicated the program did not know what to do with the funds and it was allowing the funds to be depleted through bank fees.

CONCLUSION

The evidence from the investigation indicated that MAP was running as a very autonomous program within the District, with little oversight by the Board of Trustees or the various Superintendents. Although MAP is a District-wide program, the majority of students are from the Manor boundaries. In 2013/2014, there were fewer than twenty percent of the MAP population from other District school boundary areas. In 2013/2014, approximately twenty five percent (405) of the elementary school students in the District (1609) attended Manor School. The majority of students that enter MAP are admitted at the time the students enter kindergarten. When classroom sizes expand, or students leave the District, there are some slots available to students. Approximately fifty percent of the slots for students are unavailable during the lottery process due to the priority list established by MAP. The change in the priority list in 2011 to give the children of MAP teachers the number one priority into the program (with no consideration to other Manor School teachers) created a negative impression that MAP was manipulating their enrollment policies to satisfy the needs of a very people in the program.

The areas identified in the investigation as discriminatory behaviors were the following:

1. IEP students
2. ELL students
3. Gender balancing

The statistical information confirms the low numbers of IEP families in MAP. Without more statistical information and a review of specific MAP applications, it is difficult to determine whether or not any selective screening process was undertaken through the parent meetings or other means. Over the years, the program simplified its enrollment process and eliminated many of the hurdles that might discourage families from joining MAP. The low number of ELL students in relationship to the overall population within the District are a reflection that more work needs to be done within the ELL community. It is important that a District-wide program reflect the population of the District. The low number of IEP students in the program further reflects that the District needs to assess how it promotes the program. It appears as if the long-term, negative perceptions of the program regarding volunteer hours and participation, may have created a barrier for some families. The subjective interview/consulting process families must go through to enter MAP should be evaluated by the District to determine whether or not it is an appropriate process for entry to MAP.

The MAP facilitator provided information on two other programs of choice at other Districts. Those programs did not include an interview or consulting meeting by staff as a condition of acceptance into the program. The method of selecting students into the programs was not gender-based. The priority lists for acceptance into the program were much more clearly defined as was the role of the District to oversee and manage the programs. The District should evaluate other multi-age programs and determine whether or not the District's current policies and procedures are appropriate. The District should consider a careful evaluation of the role of the Advisory Board in setting policy for a District-wide program. The role of the site Principal and the Principal's interaction with the Advisory Board should also be reviewed and more clearly defined by the District.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris Reynolds". The signature is fluid and cursive, with a large initial "C" and "R".

Chris Reynolds

CR/bbb