

Appendix B

MENDOZA PLAINTIFFS' OBJECTIONS TO FINAL UNIVERSITY HIGH SCHOOL ("UHS") ADMISSIONS PROCESS REVISION ("REVISION") AND REQUEST FOR SPECIAL MASTER REPORT AND RECOMMENDATION

Mendoza Plaintiffs remain concerned about the District's failure to comply with the USP's express provisions relating to UHS, which, *inter alia*, mandated the creation of revised admissions procedures so that they could be piloted for transfer students for the 2013-14 school year. (Sec. V,A,5,a.) Having missed that opportunity, the District has now adopted a pilot admissions process for enrollment in 2014-15 for all entering freshman and sophomores.

A critical piece of that pilot admissions process is a motivation test. The Revision is incomplete. It states that the CAIMI or "other relevant measures" will be employed but does not state the basis on which the decision to use some "other relevant measure" will be made. Neither, in the form approved by the Governing Board, does it state what weight will be given to the results of this motivation test. These omissions need to be addressed. (That said, Mendoza Plaintiffs reiterate that in concept they support the use of an additional admissions tool to assess "motivation.")

The USP expressly states that the District "shall administer the appropriate UHS admission test(s) for all 7th grade students." (Sec. V,A,5,b.) The Revision does not confirm that this will occur. The District should be required to commit to this testing.

In comments on earlier versions of the UHS admissions process both the Mendoza Plaintiffs and the Special Master have questioned the weights assigned to CogAT scores and grades in the admissions process and suggested that an evaluation be undertaken to determine the correlations, if any, between (1) CogAT scores and the grades achieved by UHS students in their classes and (2) the GPAs of entering students and the grades they achieve in their UHS classes for the purpose of determining how strong each of these factors is as a predictor of success at UHS and/or whether the weights assigned to these factors should be modified.

In the Expert Reports attached to the final Revision, the same point is made. Kenneth Bacon, Principal of Scarsdale High School in New York writes: "I would urge you to analyze the correlation of the different elements of the admissions process (the CogAT, GPA, CAIMI, and non-cognitive assessments) with student performance in the high school every year to determine their appropriate point values and inclusion in the process overall."

Such requirement, with results broken out by the race, ethnicity and ELL status of the students, should be expressly included in the Review section of the Revision.

The experts (both Kenneth Brown and Jeannie Franklin in Appendix K) noted inconsistency in the Revision in the treatment of the weight to be given advanced courses such as honors or pre-AP for the purposes of an admission score and suggested that the inconsistencies should be resolved. (This occurs both with respect to the Freshman and the Sophomore admissions sections.) Mendoza Plaintiffs object to any resolution of this inconsistency that results in additional weight being given for such courses at least until the District demonstrates that it has met its obligation under the USP to increase the number and percentage of African American and Latino students enrolled in such courses. (See, Sec. V, A, 4 related to Advanced Academic Courses.)

The Revision contains a section entitled Recruitment and Retention which simultaneously states that recruitment and retention are not part of the admissions plan and then states that efforts are in place to improve recruitment and to further develop and improve student support systems. Absent is an acknowledgement of the specific outreach and recruitment efforts mandated by the USP in Sec. V, A, 5, b, c, and d. The District should be required to confirm that these mandated recruitment efforts are in place.

With respect to recruitment and retention, one of the experts retained by the District (Jeannie Franklin in Appendix K) made specific suggestions for the use of a pre-selection committee and a school advocacy tool. Having received such recommendation from its expert, the District should report whether it is intending to implement those suggestions and, if not, why not.

Mendoza Plaintiffs lodge a separate objection to the use of Illinois Mathematics and Science Academy (“IMSA”) as the comparison school to UHS for the purpose of the power point presentation made to the Governing Board and the public with respect to the UHS admissions process. (The power point was included in the Governing Board agenda items for its October 22, 2013 meeting.) [Mendoza Plaintiffs also note that the power point seems to resolve the inconsistency noted above in favor of giving weight to enrollment in pre-AP courses. Again, as stated above, Mendoza Plaintiffs object to such weighting as discriminatory with respect to African American and Latino applicants to UHS given the disparity in participation by African American and Latino potential applicants in such advanced classes.]

Mendoza Plaintiffs lodge their objection because they believe that comparisons between the two schools are extraordinarily hard to make and that the information presented in the power point is misleading.

The power point begins by suggesting a basis for comparison by saying that Aurora, Illinois, where IMSA is located, is the second most populous city in its state as Tucson is the second most populous city in Arizona. What it does not say, however, is that IMAS is a state agency, independent of any local school district, which recruits students from all over the state of Illinois. (In fact, it is a boarding school.) (See Finn and Hockett, **Exam Schools**, at 61.) Therefore, the comparison between the demographics of Aurora, Illinois and Tucson, which is made in the power point is meaningless. The more valid comparison, as the authors of **Exam Schools** recognize at page 68 of their book, is with the entire state of Illinois. Further, as its name implies and unlike UHS, IMAS focuses on science and math. Finally, all students enter as sophomores, having completed their first year of high school.

Mendoza Plaintiffs therefore object to any conclusions about the demographics of UHS and/or Tucson that the District purports to base on a comparison with IMAS.