

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

OLIVER BROWN, et al.,
and
CHARLES and KIMBERLY SMITH, minor
children, by their mother and next
friend, LINDA BROWN SMITH, et al.,
vs.
BOARD OF EDUCATION OF TOPEKA,
SHAWNEE COUNTY, KANSAS,
et al.,

Plaintiffs,
Intervening
Plaintiffs,
Defendants.

No. T-316

ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 30

30. Please state the total number of new hires (indicate full or part time) by race or national origin for classroom teachers for the last ten (10) academic years and the school of assignment.

ANSWER:

The response of Unified School District No. 501 to Interrogatory No. 30 is attached hereto. Information concerning date of hire and school assignment was obtained from the agenda of School Board meetings. Prior to the 1973-1974 school year, assignment of teachers was not indicated in the agenda. Although staff personnel have attempted to identify the race or national origin of each classroom teacher hired in the last ten academic years, prior to the 1975-76 school year no records were maintained to indicate the race or national origin of teachers. The racial or ethnic identity of teachers prior to the 1975-76 school year as provided in this answer is based upon the recollections of present staff personnel. The racial or ethnic background of certain teachers is not known and is so indicated in this answer. This answer was prepared under the direction and supervision of Frank Ybarra, General Director of Personnel for Unified School District No. 501.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

The undersigned, of lawful age, being first duly sworn upon his oath, deposes and states:

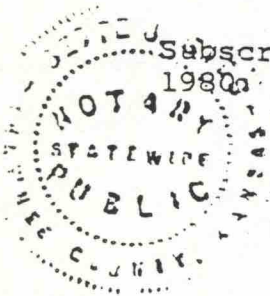
That he is General Director of Personnel for Unified School District No. 501, that he has read the answer to Interrogatory No. 30 of Intervening Plaintiffs' Interrogatories--First Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

Further Affiant saith not.

Frank Ybarra

FRANK YBARRA

Subscribed and sworn to before me this 17th day of September, 1980



Bette J. Hines

Notary Public

my appointment expires:
May 3, 1983

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original and one copy of the above and foregoing "Answer of Unified School District No. 501 to Plaintiff-Intervenors' Interrogatory No. 30" was served by hand-delivering same this 17th day of September, 1980, to Attorneys for Intervening Plaintiffs by serving Richard Jones, Scott, Scott, Scott & Scott, 724 1/2 Kansas Avenue, Topeka, Kansas 66603.

K. Gary Sebelius

K. Gary Sebelius
of Eidson, Lewis, Porter & Haynes
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Topeka, Kansas 66612 233-2332
Attorneys for U.S.D. No. 501

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ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 30

PREPARED BY

FRANK YBARRA
GENERAL DIRECTOR OF PERSONNEL
UNIFIED SCHOOL DISTRICT NO. 501
624 SW 24th STREET
TOPEKA, KANSAS 66611

1970-71 Full Time Certificated Staff

LEVEL	Unknown	RACE		SSA	I	A-C
		White	Black			
Secondary	73	73	10	3		2
Elementary	89	21	6	4		3
Special Ed.	18	3	2	1		

1970- 71 Part Time

Secondary	12	4	1			
Elementary	4	1	1			
Special Ed.	3					

1971-72 Full Time Staff

LEVEL	RACE					
	Unknown	White	Black	SSA	I	A-O
Secondary	61	51	4	4		
Elementary	69	24	3	8	1	1
Special Ed.	13	5				

1971-72 Part Time Staff

Secondary	6	4				
Elementary	2	2				
Special Ed.	1					

1972-73 Full Time Staff

LEVEL	RACE					
	Unknown	White	Black	SSA	I	A-0
Secondary	37	45	7	3		
Elementary	69	25	3			3
Special Ed.	9	3				

1972-73 Part Time Staff

Secondary		10		1		
Elementary	11	7	1			
Special Ed.	1					

1973-74 Full Time Staff

LEVEL OR
SCHOOL

RACE

	Unknown	White	Black	SSA	I	A-O
Secondary	47	29	4	2		
Topeka HS	1					
Eisenhower JH		2				
Landon/Capper JH	1					
Holliday		1				
Highland Park HS		1				
Elementary	56	8	1	1		1
Stout	2					
Avondale West	1					
Gage	1					
Hudson		1				
Special Education	25	5				1

1973-74 Part Time Staff

Secondary	11	4				
Elementary	6	1				
Special Education		1				

1974-75 Full Time Staff

SCHOOL OR
LEVEL

RACE

	Unknown	White	Black	SSA	I	A-0
Highland Park HS	2	2				
Clay Elem.	1	1				
Capitol City	6	1	2			
Topeka HS	3	5		1		1
Jardine JH	1	3				
Lundgren Elem.	3					
Avondale SW Elem.	4					
Elementary	9	4	1			
HP South Elem.	3					
East Topeka JH	1	1	1	1		
Stout Elem.	2					
Whitson Elem.	3	1				1
Special Education	22	16	1			1
Roosevelt JH	2	1				
Gage Elem.	1					
Hudson Elem.	1					
Topeka West HS	2	4				
Crane/Boswell JH		1				
East Top./TWHS		1				
Avondale East Elem.	3		1	1		
Central Park Elem.	1					
Crestview Elem.	2	1	1			
Parkdale Elem.	1					
EP Central Elem.	4	1				
Linn Elem.	2					
Quincy Elem.		1				
Lafayette Elem.	6					
Boswell JH	1	2				
Eisenhower JH	1	1	1	1		
Crane JH		7				
Secondary		1				1
Quincy/Lundg. Elem.	1					
Landon JH		1		1		
Rice Elem.	3					
Rice/Whitson Elem.	1					
Highland Park JH		1		1		
Polk Elem.	3	1				
Holliday JH	1	1				
Quinton Heights/ Monroe Elem.	1					
Monroe Elem.	2			1		
McCarter Elem.	3					
Belvoir Elem.	3		1			
Sumner Elem.	1					
Bishop Elem.	1	1				
Lowman Hill Elem.	2					
McEachron Elem.	1					
McClure Elem.	2					
Avondale West Elem.	3					
Potwin Elem.	1					

1974-75 Full Time Staff Continued

	Unknown	White	Black	SSA	I	A-O
French JH	1	1				
Capper JH		1				
THS/Holliday JH		1				
THS/TWHS						1
Boswell JH/ Landon JH		1				
Randolph Elem.		1				
Capper/East Top. JH		1				
Grant Elem.	1					
Curtis JH		1				

1974-75 Part Time Staff

Capper JH		1				
Belvoir Elem.	1					
Holliday JH	1					
Topeka West HS		1				
Boswell JH		2				
Highland Park HS	2	1				
Quincy Elem.				1		
Secondary	1	1				
French JH		2				
Highland Park JH	1					
Hudson/Quincy Elem.	1					
Crane/Boswell JH			1			
TWHS/French JH		1				
Special Education	1					

1975-76 Full Time Staff

SCHOOL OR
LEVEL

RACE

	White	Black	SSA	I	A-C
Avondale West Elem.	3				
Avondale East Elem.	2				
Topeka HS	9	1			
East Topeka JH/ Rice Elem.	1				
Eisenhower JH	4				
Special Education	30	1	3		1
Capitol City Elementary	5				
Belvoir Elem.	4	1	1		
Stout Elem.	1				
Rice/Whitson Elem.	1				
Landon JH	1				
Highland Park JH	3		1		
Highland Park HS	4	2			
Topeka West HS	4				
Capper JH	3				
Quinton Heights Elem.		1			
HP Central Elem. Secondary	4				
Sumner/Potwin Elem.	1				
Crestview Elem.	3				
Lafayette Elem.	3	2			
East Topeka JH	4	2			
HP North	2				
HP North/ Avondale W Elem.	1				
Boswell JH	3	1			
Lowman Hill	1				
Holliday JH/ State Street Elem.	1				
Roosevelt JH	1	1			
Jardine JH	2				
Potwin Elem.	2				
Bishop Elem.	2				
Linn/Sheldon Elem.	1				
Belvoir/Parkdale Elem.	1				
Boswell/French JH	1				
Gage/Whitson Elem.	1				
THS/Holliday JH	1				
HPHS/Jardine JH	1				
Linn Elem.	3				
McEachron Elem.	1				1
Adventure Center	2				
Hudson Elem.	1				
Grant Elem.	4				
Special Education	2				
HPJH/THS	1				
Roosevelt/ Holliday JH	1				

1975-76 Full Time Staff Continued

	White	Black	SSA	I	A-O
Gage Elen.	1				
Grant/Quincy Elen.		1			
McClure Elem.	1				
Sumner Elem.	1				
Randolph Elem.	1				
Central Park Elem.	1				

1975-76 Part Time Staff

Capper JH	1				
Holliday JH	1				
Quinton Heights Elem	2				
McCarter Elem.	1				
Boswell JH	1				
Eisenhower JH	1				
Highland Park JH	1				
Grant Elem.	2				
McClure Elem.	1				
East Topeka JH	1				
Elementary	2				

1976-77 Full Time Staff

SCHOOL OR LEVEL	RACE				
	White	Black	SSA	I	A-C
Topeka West HS	5				
Capitol City	8				1
Whitson Elem.	6				
McCarter Elem.	1				
Special Education	17				1
Linn Elem.	5				
Lafayette Elem.	3				
Elementary	2				
Parkdale Elem.	3	2			
Avondale East Elem.	2				
Potwin Elem.	1				
HPS/THS	1				
Highland Park JH	5	1			
Topeka HS	6				
Highland Park HS	4				
Belvoir/HP South Elem.	1				
Hudson Elem.	3				
Sheldon Elem.	3				
McEachron Elem.	2				
Whitson Elem.	2				
THS/East Topeka JH	1				
Eisenhower JH	3				
Hudson/Potwin Elem.	1				
Quincy Elem.	1				
Belvoir Elem.	3	1	1		
Quinton Heights Elem.	1				
Gage Elem.	1				
HP Central Elem.	2				
Roosevelt/Holliday JH			1		
Landon JH	4				
HPJH/Landon JH					1
East Topeka JH	3				
Roosevelt JH	2				
Central Park Elem.	2				
Landon JH/HP North Elem.	1				
Holliday JH	2				
THS/Roosevelt JH	1				
Grant Elem.	3				
Boswell JH	3				2
Randolph Elem.	1				
HP North Elem.	2				
HP South Elem.	2				
Jardine JH	2				
Crestview Elem.	1				

1977-78 Full Time Staff

SCHOOL CR
LEVEL

RACE

	White	Black	SSA	I	A-C
Capitol City	2				1
Topeka West HS	5				
HP Central Elem.	7				
Lowman Hill Elem.	2				
Gage/Whitson Elem.	1				
Stout Elem.	2				
Special Education	29	1	2		
Parkdale Elem.	1	1			
Eisenhower JH	4				
Roosevelt JH	3				
Belvoir Elem.	4				
Linn Elem.	3				
Sheldon Elem.	2				
East Topeka JH	4				
Central Park Elem.	2				
Highland Park HS	8	1			
HPHS/Roosevelt JH	1				
Eisenhower/HPJH	1				
KAVTS	6	1			
Boswell/Jardine JH	1				
Holliday JH	2				
Quincy Elem.	2				
Highland Park JH				1	
Topeka HS	5				
Landon JH	3				
HP South Elem.	4				
Lafayette Elem.	1				
Central Park/Stout Elem.	1				
State Street Elem.	2				
McCarter Elem.	1				
HPJH/East Topeka JH	1				
Boswell JH	1			1	
Stout/Bishop Elem.	1				
French JH	2				
Avondale West Elem.	1				
Jardine JH	3				
Ludgren Elem.	1				
Ludgren/Lowman Hill Elem.	1				
Elementary	1				
Gage/Hudson Elem.	1				
Hudson Elem.	2				
HP North Elem.	1				
Rice Elem.	2				
Crestview Elem.	2				
Boswell/Holliday JH	1				
Avondale Ease Elem.	1				
Central Park/Potwin Elem.	1				

1977-78 Full Time Staff Continued

	White	Black	SSA	I	A-O
Polk Elem.	1				
Avondale SW Elem.	1				

1977-78 Part Time Staff

Special Education	1				
Boswell/Jardine JH	1				
Parkdale Elem.		1			
Highland Park HS	1				
Avondale East Elem.	1				
HFHS/HPJH	1				

1978-79 Full Time Staff

SCHOOL OR
LEVEL

RACE

	White	Black	SSA	I	A-O
HP Central Elem.	3	2			
Stout Elem.	2				
Roosevelt JH	4			1	
French JH	2				
East Topeka JH	6	3			
Quinton Heights Elem.	1	1			
Landcn JH	3				
Capitol City	13				
McClure Elem.	1				
Linn Elem.					1
Avondale West Elem.	1				
Boswell/Jardine JH	1				
Special Education	20				
Quincy Elem.	4				
Avondale East Elem.	3				
Topeka HS	3				
Jardine JH	3				
Holliday JH	3				
East Topeka/ Roosevelt JH	1				
McEachron Elem.	2				
Lundgren Elem.	2				
State Street Elem.	1				
Topeka West HS	3				
Crestview/Stout Elem	1				
Secondary	1				
Lafayette Elem.	4	1			
Hudson Elem	1				
Boswell JH	4	1			
Highland Park HS	3	1			
Quincy/Sumner Elem.	1				
Sumner Elem.	1				
Potwin/Stout Elem.	1				
Highland Park JH	3				1
Eisenhower JH	3				
KAVTS	6				
Elementary	3				
Topeka Education Center	3				
Central Park/Stout Elem.	1				
Whitson Elem.	1				
Rice Elem.	2				
Randolph/ Central Park Elem.	1				

1978-79 Part Time Staff

	White	Black	SSA	I	A-O
Lundgren/State					
Street/Belvoir Eleml					
Topeka West HS	1				
Elementary	1				
Secondary	1				
Holliday JH	2				
Capitol City	1				
HP North Elem.	1				
Highland Park HS	1				
Special Education	1				
Avondale East Elem.	1				
Highland Park JH	1				
McCarter/Avondale					
SW Elem.	1				

1979-80 Full Time Staff

SCHOOL OR LEVEL	RACE				
	White	Black	SSA	I	A-O
Bishop	1				
Central Park Elem.	2				
Capitol City	15				
Linn Elem.	2				
Avondale East Elem.	8				
Topeka HS	14	2			
HPHS/Holliday MS	1				
Topeka West HS	5		1	1	
Special Education	29	1		1	
McClure Elem.	3				
Roosevelt MS					
Jardine MS	2				
McCarter Elem.	3				
Elementary	1				
Holliday MS	1				
Whitson/Gage Elem.	1				
Quincy Elem.	1				
Highland Park HS	9	1			
McCarter/Shaner Elem.		1			
Eisenhower MS	4	1			
Highland Park MS	6	1			
Lafayette Elem.	6	1			
Crestview Elem.	1				
HP Central Elem.	3				
HP South Elem.	3				
Whitson Elem.	1				
Landon MS	3				
HPMS/HPHS	1				
East Topeka MS	2	1			
French MS	3				
Boswell MS	5				
Sumner Elem.	1				
Holliday MS	2				
Sheldon Education Center	1				
HP North Elem.	2				
Lundgren Elem.	3				
Gage Elem.	1				
Randolph Elem.	2				
McEachron Elem.	1				
Shaner Elem.	1				
KAVTS	9			1	
Rice Elem.	2				
Hudson/Lafayette Elem.	1				
State Street	1				

1979-80 Full Time Staff Continued

	White	Black	SSA	I	A-O
TMS/Landon/ Holliday MS	1				
Polk Head Start Center	1				
Hudson Elem.	2				
Avondale West Elem.	1				
Stout Elem.	2				
Landon/Holliday MS			1		

1979-80 Part Time Staff

Avondale East Elem.	1				
Highland Park MS	2				
McCarter/Shaner Elem.	1				
Secondary	1				
Boswell MS	1				
Topeka Education Center	1				