IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

OLIVER BROWN, et al.,

Plaintiffs,

and

CHARLES and KIMBERLY SMITH, minor children, by their mother and next friend, LINDA BROWN SMITH, et al.,

No. T-316

Intervening Plaintiffs,

VS.

BOARD OF EDUCATION OF TOPEKA, SHAWNEE COUNTY, KANSAS, et al.,

Defendants.

ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 3
OF THE SECOND SET

3. Describe by year and by race participants in the CETA, Head Start and Follow Through programs. Which school was each program housed for each respective year?

ANSWER:

Attached hereto is the response of Unified School District No. 501 to Interrogatory No. 3 of the Intervening Plaintiffs' Interrogatories-Second Set, which was prepared under the direction and supervision of Don R. O'Neil, Associate Superintendent for Management Services for Unified School District No. 501, with the assistance of Owen M. Henson, Associate Superintendent for Education Services; Gary Livingston, General Director of Instructional Services; Roy W. Browning, Jr., Assistant Superintendent of Pupil Personnel Services; and Theresa Counts, Coordinator of Headstart.

In answer to this interrogatory, information regarding the Follow Through program is set forth on page 1 of the response.

Information regarding participants in the CETA program is contained on page 2 of the response. The information available regarding the Headstart program, the location of Headstart classrooms and the racial breakdown of students by year and school is set forth on pages 3-7 of the response.

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 Associate Superintendent for Management Services for Unified School District No. 501, that he has read the answer to Interrogatory No. 3 of Intervening Plaintiffs' Interrogatories -- Second 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.

Libed and sworn to before me this 30th day of March, 1982.

7/10, 3 1983

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501 TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 3 OF THE SECOND SET was served by hand delivering the same this 3 of day of March, 1982, to attorneys for Intervening Plaintiffs by serving Richard Jones, 605 S.E. Quincy, Suite 1, Topeka, Kansas 66603.

K. Gary Sebelius of Eidson, Lewis, Porter & Haynes 1300 Merchants National Bank Bldg. Topeka, Kansas 66612

(913) 233-2332

Attorneys for Unified School District No. 501 3. Describe by year and by race participants in the Follow Through Program. Which school was each program housed for each respective year?

The Follow Through Program was housed by year and schools as follows: 1970-71 Avondale East, Lafayette 1971-72 Avondale East, Lafayette 1972-73 Avondale East, Crestview, Lafayette 1973-74 Avondale East, Crestview, Lafayette 1974-75 Avondale East, Crestview, Lafayette 1975-76 Highland Park Central, Lafayette, Lundgren 1976-77 Highland Park Central, Lafayette, Lundgren 1977-78 Highland Park Central, Lafayette 1978-79 Highland Park Central, Lafayette 1979-80 Highland Park Central, Lafayette

1980-81 Highland Park Central, Lafayette, Linn

District student enrollment records and Follow Through annual applications were reviewed to identify student participants in the Follow Through Program by race. With the exception of school years 1974-75 and 1975-76 minority data were obtainable. Following is a list by year and by minority race of student participants of the

Follow Through Program.

	American Indian	Negro d Black	or Spanish Surnamed or Hispanic	Oriental or Asian American	PROGRAM TOTAL
1970-71	3	80	70	0	200
1971-72	10	158	66	0	303
1972-73	10	218	92	1	400
1973-74	17	182	66	1	346
1974-75					
1975-76					
1976-77	5	179	27	3	279
1977-78	5	184	20	2	273
1978-79	4	152	26	0	237
1979-80	4	163	21	4	263
1980-81	3	162	19	1	244
1981-82	Federal	funding	recisionprogram	canceled	

Question No. 3

Describe by year and by race participants in the CETA Program. Which school was each program housed for each respective year?

Participants for the Comprehensive Employment Training Act (CETA) are selected and approved by the Department of Labor. USD 501, prior to program implementation, is informed by the Department of Labor services the number of student-funded positions approved and a list of CETA-eligible students. The students are assigned to available worksites, but oftentimes will rotate among numerous work experiences within USD 501. Since the students are selected and assigned by the Department of Labor, specific statistics by year (with reference to race and worksite) are not available. In a previous conversation with Mr. Bill Bywater, Department of Labor, he reported that approximately 66 to 75% of the student participants were minorities.

The following is the CETA Program description submitted in a previous interrogatory:

49. Comprehensive Employment Training Act (CETA)

During the spring of 1978, a working agreement between the Topeka/Shawnee County Department of Labor Services and Unified School District No. 501 was developed to initiate the joint operation of the CETA Youth Employment Program to be actuated within the Topeka Public Schools. The aforementioned agencies have cooperated in providing educational/work experiences for CETA-eligible students during the summer term of 1978, school year 78/79, summer of 1979, and school year 79/80. According to the Department of Labor's statistics submitted to this office, approximately 100-150 students were involved to some extent in the summer CETA program coordinated by USD 501. Also, according to the Department of Labor, approximately 125-175 students participated in the school-term work programs. In addition, they reported that approximately 66-75 percent of the student participants were minorities.

This project was operated under the auspices of the Comprehensive Employment Training Act with USD 501 providing the management, support staff and materials, while CETA provided funds to pay for career resource personnel, student work and educational experience salaries, and specialized career materials and equipment. Each student in the program had to be from a family of low income and approved by the CETA Office. Additional employment opportunities were provided to numerous handicapped students. Students enrolled in the program received paid work experiences and career education development program opportunities as a result of this cooperative effort between CETA and USD 501.

LOCATIONS OF CLASSROOMS

968-69 eadstart Grant Lafayette Monroe Parkdale Quincy	2 Lafayette 1 Linn 1 Monroe 2 Parkdale 1 Ouincy	L Grant . 1 Gr Lafayette . 2 La Linn . 1 Li Monroe . 2 Parkdale . 1 Qu	71-72 ant fayette nn rkdale incy inton H
2 Belvoir Crant Linn Parkdale Quinton Egts.	1973-74 2 Belvoir 1 Crant 2 Linn 2 Parkdale 2 Quinton Hgts.	2 Belvoir	75-76 condale elvoir arkdale
1976-77 2 Avondale East 2 Belvoir 4 Parkdale	1977-78 2 Avondale East 4 Parkdale 2 Rice		979-80
1980-81 3 Polk	1981-82 8 Polk		

RACIAL BREAKDOWN OF STUDENTS

	Headstart Location	Caucausian or White	Negro or Black	Spanish Sur-Named	American Indian	Orienta or Asian	1 All Others	Total
7 -2 -23 -23 -4 -5	1968-69 Grant Lafayette Honroe Parkdale							
-6	Quincy		29		11 1 1		11	
(,,	Total							
10		1 1					-	30_
	1 Grant : 2 Lafayette	23	20	17				60
	1 Linn	20	16	1 4				30
4 11	2 Parkdale	16	41	3 .				60
15	1 Quincy	12	7	10	1			30
. 12:	2 Quinton Hg		20	39	2		1.	300
CY	Total	135	124	39	1 1			1 1
رن و.	1970-71							30
	1 Grant	20		22				60
21		19	10	1		7	3	30
21			13	2	2			30
	2 Parkdale	22	35	3				60
20	1 Quincy	16	10	6				30
26	2 Quinton H	gts. 28	26	- 4	2		- 1	60
~ ?!		129	119	46	6		1	300
-11,	1 Grant !	16	10	7	- ; ;	!	ii	33
31	1		29	.10	1			66
		18	12	3		11	11	66
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	121 301111111111111111111111111111111111	1.	24	39	11 14	11		
	Total	140	114	1		1 1		
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		li 2 2 5	4					-

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	Headstart Location	Caucausian or White	Negro or Black	Spanish Sur-Named	American Indian	Ortl All others	Total
	972-73 2 Belvoir 1 Grant	25 16	30	11 3			66
	2 Linn 2 Parkdale	36 25	29 35	6			67
	2 Quinton Hg	140	132	26			298
9	1973-74 2 Belvoir	25	36	3	1		65
13	Crant Linn Parkdale Quinton lig	36	24 33 27	7 6 2 .			67 68 66
	Total	146	134	19			3,00_
	h 072-75 2 Belvoir 1 Grant 2 Linn	- 20 21 30	34 10 27	13 2 10	1	1	68 35 67
2	2 Parkdale		32 30 133	6 3	2	1	67 66 303
?	Total 1975+76 1975-76	133	133				
? ?	4 Avondale I 2 Belyoir 2 Parkdale	67 27 30	54 31 29	11 15 13	3	2	137 73 72
	Total 1976-77	124	114	39	3	2	282
	2 Avondale 2 Belyoir	37 25 65	34 42 61	13		1	75 76 141
_	Total	127	137	26		1	292
				-5-			

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Headstart Location	Caucausian or White	Negro or Black	Spanish Sur-Named	American Indian	Ortl. or Asian	All Others	Tota
1977-78							72
2 Avondale E	51	15	6				1 .1
4 Parkdale	76	62	8	4	2		152
2 Rice	32	29	12.	2	1 1		76
Total	159	106	26	6	3		300
1978-79							
		31			1 1		102
3 Avondale E	55	48	15		1 1] !!	1119
3 Rice	1 40	30	6	11 1 12	11 1	!	1 71
The second living the second l	156	109	22		3		292
Total	130						
1979-80			26	4	3		3,00
8 Polk	149	118	26	4	3		300
Total	149	1118	20				T
1930-81						2	2,71
Polk	126	107	28		3		
Total	126	107	28		3	2	
1981-82					; .		
8 Polk	122	105	19	3	6	1	256
TOTAL	122	1 105	19		6	1	2.56
	1122						
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31							
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