

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. 10
OF THE SECOND SET

10. For each Junior High and High School in existence for each year during the school years from 1953 to the present, state whether any standardized tests designed to measure aptitude, ability or suitability for college were administered at the school.

If the answer is in the affirmative, state:

- a. The name of the test(s).
- b. A description of the test and the objectives of the test.
- c. The name and address of the author or preparer of the test.
- d. The name and address of the person or organization that scored the test.
- e. The name, official title and address of the person in the school district who had the responsibility for selecting the test to be administered at the school.
- f. The average and median test score for each grade level at the school.

ANSWER:

Attached hereto is the response of Unified School District No. 501 to Interrogatory No. 10, which was prepared under the

direction and supervision of James F. Coder, Director of Guidance Services. As set forth in the attached response, certain information could not be supplied in answer to this interrogatory due to the fact that the data has not been maintained or was never provided to the School District by the testing services. In response to subpart f, with respect to the American College Testing program (ACT), the School District was able to compile average scores for each of the high schools for the time period beginning with the 1974-75 school year through the 1980-81 school year.

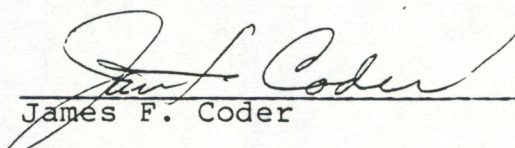
V E R I F I C A T I O N

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

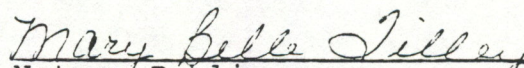
The undersigned, of lawful age, being first duly sworn upon his oath, deposes and states:

That he is Director of Guidance Services for Unified School District No. 501, that he has read the answer to Interrogatory No. 10 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.

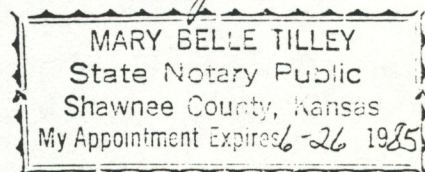

James F. Coder

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


Notary Public

my appointment expires:

June 26, 1985.



C E R T I F I C A T E O F S E R V I C E

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. 10 OF THE SECOND SET was served by hand delivering the same this ___ 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

10. Information and materials relating to tests of this nature are generally made available to all high school students. These include the PSAT/NMSQT (Preliminary Scholastic Aptitude Test/National Merit Scholarship Qualifying Test), the SAT (Scholastic Aptitude Test), and the ACT (American College Testing Program). Juniors and a few sophomores who plan to attend college usually take the PSAT/NMSQT. Seniors and a few juniors usually take either the SAT or ACT or both. Some younger students take the tests also. For instance, SAT scores are necessary for students under thirteen years of age who want to receive consideration in the Johns Hopkins Study of Mathematically Precocious Youth Program and the Johns Hopkins Study for Verbal Identification or for 7th and 8th graders who want to participate in the Duke University Talent Identification Program.

In all instances, students identify themselves by obtaining registration materials, paying the registration fee (or applying for a fee waiver), and appearing at the test center to take the tests. Registration for these tests is open to any person regardless of age or ability.

The PSAT/NMSQT is administered in all three of our U.S.D. No. 501 high schools on one or the other of the two nationally established test dates. The SAT is administered seven times a year at test centers around the globe. Topeka High School is a test center for some of the dates set by the College Board. All three U.S.D. No. 501 high schools serve as test centers for the ACT in October. The ACT is administered five times during the year throughout the nation on established dates.

- a. 1953 to present: Preliminary Scholastic Aptitude Test/National Merit Scholarship Qualifying Test (PSAT/NMSQT).
- b. The PSAT/NMSQT is a test that measures verbal and mathematical reasoning abilities important in college work. The test is co-sponsored by the College Board and National Merit Scholarship Corporation (NMSC) and is developed and administered for them by Educational Testing Service (ETS).

Information from the PSAT/NMSQT can be helpful to students and their counselors in planning a student's education beyond high school. PSAT/NMSQT scores can be used to estimate a student's probable performance on the College Board's Scholastic Aptitude Test (SAT), which is required for admission to some colleges. Such an estimate is possible because the PSAT/NMSQT is a shortened version of the SAT and its score scale of 20 to 80 is equivalent to the 200 to 800 SAT scale. (A verbal score of 41 on the PSAT/NMSQT, for instance, is comparable to an SAT verbal score of 410).

The PSAT/NMSQT is the qualifying test for students who wish to participate in the nationwide scholarship competitions conducted by National Merit Scholarship Corporation.

The National Merit Scholarship Program, now in its twenty-eighth year, is open to all U.S. students who take the PSAT/NMSQT at the proper time during high school and who meet other published eligibility requirements. Since 1965, NMSC also has administered the National Achievement Scholarship Program for Outstanding Negro Students, a compensatory activity in which only black students may participate. Students who take the PSAT/NMSQT also have the opportunity to be included in the College Board's Student Search Service. Participants in this free service may receive materials from colleges and governmental scholarship programs informing them of educational and financial aid opportunities.

- c. PSAT/NMSQT
Educational Testing Service
Box 589
Princeton, New Jersey 08541
- d. PSAT/NMSQT
Educational Testing Service
Box 589
Princeton, New Jersey 08541
- e. A local school district does not select the test. Students elect to take the test by paying a registration fee (or obtaining a fee waiver) and appearing at the test center on the proper date.

The decision for our high schools to participate in the program and to serve as test centers currently rests with James F. Coder, Director of Guidance Services, and the individual building principals. However, public demand or expectations probably makes it imperative that we do so.

- f. Scores obtained on these tests are reported to the students who participated and an individual score report is provided for school records by the scoring service. No summary data is provided for the school and summary information has not been generated over the years.

10.

- a. 1953 to present: Scholastic Aptitude Test (SAT), (usually taken by seniors, but a few sophomores and juniors and middle school students take the SAT).
- b. The SAT is a multiple-choice test made up of separately timed verbal and mathematical sections. Verbal questions measure the ability to understand what the student reads and the extent of his/her vocabulary. Mathematical questions measure the ability to solve problems involving arithmetic reasoning, algebra, and geometry. These abilities have been shown to be related to successful performance in college. The SAT does not measure other kinds of abilities which may be associated with success in college, such as special talents or motivation.

A student's high school record is probably the best evidence of his/her preparation for college. Because applicants have taken different courses and come from high schools with different grading practices, college admissions officers need a common measure of ability, such as the SAT. However, scores on the SAT are just part of the information used in making an admissions decision.

- c. The College Entrance Examination Board
Educational Testing Service
Box 592
Princeton, New Jersey 08541
- d. Educational Testing Service
Box 592
Princeton, New Jersey 08541
- e. A local school district does not select the test. Students elect to take the test by paying a registration fee to ETS and appearing at the test center. Topeka High School serves as a test center for persons from throughout Northeast Kansas on some test dates.
- f. Because not more than 50 students from our school district take the SAT at a time we do not receive an average score for our district or high schools. Scores are reported individually to students who take the test.

10.

- a. 1967 to present: The American College Testing Program (ACT)
- b. The four academic tests of the ACT Assessment measure abilities in the subject areas traditionally identified with college and high school programs: English, mathematics, social studies, and natural sciences. The English Usage Test measures students' understanding and use of the basic elements of correct and effective writing; the Mathematics Usage Test, their mathematical reasoning and problem-solving ability; the Social Studies Reading Test, the problem-solving skills required in the social studies; the Natural Science Reading Test, the critical reasoning and problem-solving skills required in the natural sciences. The arithmetic average of the scores on these four tests is the ACT composite score, which is often used as a measure of overall academic ability.

The ACT test scores are reported on a standard scale that ranges from 1 to 36. On this scale, a student's true score is usually within two score points on either side of the score reported for each of the four tests and within one point on either side of the reported ACT composite score.

ACT scores are seldom used as a basis for admission to college. They are sometimes used by the colleges as a factor in awarding scholarships and grants and for the purpose of placement in college courses.

- c. The American College Testing Program
Iowa City, Iowa
- d. The American College Testing Program
Iowa City, Iowa
- e. A local school district does not select the test. Students elect to take the test by paying a registration fee to ACT and appearing at the test center. All three U.S.D. No. 501 high schools serve as test centers in October.
- f. Median test scores are not available as this information either was not obtained or has not been kept. Average (mean scores) are as follows:

Highland Park High School

<u>Year</u>	<u>Number of Students</u>	<u>Average composite score</u>
1974-75	115	18.9
1975-76	115	17.0
1976-77	119	18.7
1977-78	109	18.9
1978-79	95	17.3
1979-80	86	17.4
1980-81	93	17.8

f. (continued)

Topeka High School

<u>Year</u>	<u>Number of students</u>	<u>Average composite score</u>
1974-75	253	18.9
1975-76	235	19.1
1976-77	232	18.1
1977-78	174	20.9
1978-79	170	19.7
1979-80	193	18.3
1980-81	152	18.1

Topeka West High School

<u>Year</u>	<u>Number of students</u>	<u>Average composite score</u>
1974-75	275	19.8
1975-76	284	20.6
1976-77	285	19.4
1977-78	218	19.8
1978-79	269	20.0
1979-80	285	19.1
1980-81	274	20.2