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January 29, 2024

VIA EMAIL

Oakland Unified School District Directors, Board of Education via Jenine Lindsey, Interim General Counsel 1000 Broadway, Suite 300 Oakland, CA 94607

Douglas N. Freifeld, Partner F3 Law 70 Washington Street, Suite 205 Oakland, California 94607

Re: Oakland Unified School District's Legal Duty to Follow Assembly Bill 1912, Prevent Disproportionate Harm, and Alleviate Segregation as it Plans Whether to Close, Merge, or Consolidate Schools in School Year 2025-2026

Dear Board President and Directors,

The California Department of Justice's Bureau of Children's Justice has concluded its investigation pursuant to Government Code section 11180 et seq. into Oakland Unified School District (OUSD)'s February 8, 2022 decision to close Parker, Brookfield, Carl B. Munck (Munck), Korematsu, Grass Valley, Horace Mann, and Community Day School, and truncate grades 6-8 of Hillcrest and La Escuelita ("February 8, 2022 Closure Decision"). This letter sets forth only the conclusions we have reached that are based solely on publicly available information. Any findings, concerns, or information the Department of Justice obtained pursuant to any subpoena or that were provided confidentially in response to our investigation are not referenced or relied upon within this letter in accordance with Government Code section 11180 et seq.

We are also writing to reiterate OUSD's legal duties as it publicly plans for potential closures, mergers, or consolidations for school year 2025-2026. We strongly recommend that OUSD engage an independent expert to assist in the school redesign process and the planning and implementation of any closure, merger, or consolidation that may occur to ensure full compliance with the law and robust community and school-site participation and input.

I. Investigation Conclusions Based on Publically Available Documents and OUSD Legal Obligations

The Department's analysis of public data showed that OUSD's February 8, 2022 Closure Decision would have disproportionately impacted Black and low-income elementary school students and also high-needs students with disabilities in special day classes, if the decision had not been rescinded. OUSD's reliance on sustainability metrics to make the February 8, 2022 Closure Decision contributed to closures with a statistically significant disproportionate impact on Black and low-income elementary students, based on review and analysis of publicly available data. And these metrics also penalized schools serving the most students with disabilities in special day classes.

If OUSD implements any future school closures, mergers, or consolidations, it must abide by the legal mandates imposed by California civil rights laws and Education Code section 41329 ("AB 1912"). Under the California Constitution, a district's closure policies, criteria, or practices ("policies") must be crafted to alleviate school segregation. This includes closure-related neighborhood-focused enrollment policies that reinforce school segregation. Additionally, school district closure and reassignment policies that have disproportionate and adverse impacts on students based on race, color, national origin, disability, gender, or sexual orientation may be unlawful. And school districts may not implement policies that "discriminate[] on the basis of the wealth of a district and its residents."

As OUSD moves forward to plan closures, mergers—including a merger of two schools sharing the same campus—, or consolidations in school year 2025-2026 or thereafter, it is required to follow AB 1912's requirements, and ensure that any OUSD closure, merger, or consolidation decision does not disproportionately impact Black and low-income students and students with disabilities. In this regard, we write to share our concerns about the planned AB 1912 process and equity impact metrics announced in the presentation and memorandum prepared in anticipation of the December 14, 2023 meeting of the Board of Education.⁵

¹ See, e.g., Cal. Dept. of Ed., OUSD Enrollment Data <<u>Dataquest</u>> (as of Jan. 26, 2024.); see also Superintendent Kyla Johnson-Trammell, <u>Presentation</u> at January 31, 2022 Meeting of the Oakland Unified School District Board Meeting re Recommendations for School Consolidations (Jan. 31, 2022), at 7:56-8:32 (as of Jan. 25, 2024).

² McKinny v. Oxnard Union High School Dist. Bd. of Trustees (1982) 31 Cal.3d 79, 92–93; Crawford v. Bd. of Education of the City of L.A. (1976) 17 Cal.3d 280, 301–302; Jackson v. Pasadena City School Dist. (1963) 59 Cal.2d 876, 881-882 (Jackson).

³ Cal. Const., art. I, § 7; Ed. Code, §§ 220, 262.3, & 262.4; Gov. Code, § 11135; Cal. Code Regs., tit. 5, § 4911 & tit. 2, § 11154; see also *Jackson*, *supra*, 59 Cal.2d at p. 881.

⁴ Serrano v. Priest (1971) 5 Cal.3d 584, 604.

⁵ Superintendent Kyla Johnson-Trammell et al., Memorandum to Board of Education re AB 1912 Equity Impact Analysis Metrics Recommendation (Dec. 13, 2023) < <u>Dec. 13 Board Memorandum</u>> (as of Jan. 26, 2024); OUSD, AB 1912 Equity Impact Analysis Metrics Recommendation (Dec. 13, 2023) < <u>AB 1912 Presentation</u>> (as of Jan. 26, 2024) ("Presentation").

We note that the process and metrics described in these documents meet AB 1912's minimum requirements as to equity metrics and proposed ways to involve the community. However, we remain concerned that OUSD has added four metrics—Live/Go data, demand rate, enrollment size of a school, and sustainable school size—and may analyze others—AB 1912 (a) to (d)—in a way that will lead to an outcome that mirrors the February 8, 2022 Closure Decision, thereby disproportionately impacting Black students, low-income students, and potentially also students with disabilities. Even if the process is conducted in accordance with AB 1912, OUSD must also ensure that the results do not violate California's Equal Protection Clause or anti-discrimination mandates.⁶

We also write to raise significant concerns because during the February 8, 2022 Closure process, OUSD did not publicly present an analysis focused on the impacts on transportation routes and access to schools for district families. It is critical that OUSD conduct this analysis prior to making any determinations to ensure that Black and low-income students are not bearing a disproportionate school transportation burden. Public data shows that, in the last decade, many of the schools closed were in neighborhoods serving a significant number of Black and low-income families, and closure decisions were made without any public analysis of transportation impacts, including the costs borne by families and travel time to schools.

Overall, OUSD must take affirmative steps to ensure that its enrollment and attendance boundary and school closure decisions, when viewed in the context of historic patterns of government-sanctioned neighborhood racial segregation, help to alleviate school segregation and do not create disproportionate transportation burdens for protected subgroups.

Accordingly, as OUSD works to comply with AB 1912's transportation impact analysis requirement, we strongly recommend that OUSD publish an analysis of the transportation impacts of school closures since 2012, so that the District and the public have a complete understanding of the existing context of transportation burdens to inform decision-making about the transportation impacts of closing or consolidating any individual school going forward. We are happy to work with OUSD to publish such an analysis.

In the subsequent sections of this letter, we provide our specific concerns and recommendations regarding several of OUSD's proposed closure criteria and metrics.

II. Some Recommended Metrics Have Resulted in Disproportionality and May Maintain Segregation

OUSD staff recommends that several AB 1912 equity criteria—school facilities conditions, operating cost, and capacity—be satisfied using metrics, indexes, or tools that OUSD used to make the February 8, 2022 Closure Decision, which, as we discuss *supra*, resulted in closures with a statistically significant disproportionate impact on Black and low-income students, based

⁶ See, *supra*, fns. 2-4.

⁷ Attachment A, item 5.

on the Department's review and analysis of publicly available data. We strongly recommend that OUSD analyze these metrics using a different approach or method as follows:

• School Facilities Condition: Under the AB 1912 (a) factor of "the condition of a school facility," OUSD recommends to the Board that it use the "OUSD facility condition index," a metric that OUSD used to make its February 8, 2022 Closure Decision, which appears to prioritize maintaining schools with the best facilities conditions. However, use of this index without further analysis of historical resource decisions may penalize schools for district actions that resulted in unequal school infrastructure conditions.

As you may know, on June 20, 2018, after OUSD conducted a district-wide resource assessment, it reported that "assets and capacities" varied across the district in a way that coincided with "patterns of racial segregation, and systemic community disinvestment." Public reporting also provides that OUSD may have made decisions to modernize infrastructure and increase capacity at certain predominately white schools at the expense of predominately Black schools, leading to predominantly Black schools becoming under-enrolled, with a lower demand rate. For example, OUSD retrofitted Redwood Heights' campus for earthquake safety and implemented a "major campus modernization" project," but we found no similar public documentation showing similar upgrades for Munck, even though the schools are five minutes apart. In 2009, it was reported that OUSD canceled a plan to send the Redwood Heights overflow students to Munck and increased enrollment capacity at Redwood Heights instead. 11 As such, OUSD's decisions may have resulted in Munck being housed in an outdated building in need of modernization with low enrollment, whereas Redwood Heights is in a modern building with high enrollment. In addition to or in lieu of using the index, any discussion of school facilities should include an assessment of past and present inequities in resource allocation due to educational segregation or other causes. Where unequal resources, facilities, and recreational space are identified, OUSD should assess how to repair the harm going forward within the closure and redesign process and/or not use the index.

• School Operating Cost: Under the AB 1912 (b) factor of "operating cost of a school," OUSD staff recommends using the metric "Impact-Savings if school is closed." Funds and spending for students receiving special education services generally follow students in their Individualized Education Program (IEP) to their next school. Local Control Funding Formula (LCFF) funds allocated to assist specific populations should generally follow such students to their next school as well. Most recently, the staff report

⁹ Attachment A, item 1, emphasis added.

⁸ Presentation, *supra*, at p. 14.

¹⁰ Landtech Consultants, Redwood Elementary School (Jul. 3, 2021)

https://www.landtech.com/project/redwood-elementary-school/> (as of Jan. 26, 2024).

¹¹ Johnson, *It makes no sense that child can't go across the street* (March 20, 2007) SFGate https://www.sfgate.com/bayarea/johnson/article/it-makes-no-sense-that-child-can-t-go-to-the-2577642.php (as of Jan. 26, 2024).

Presentation, *supra*, at p. 14.

presented at the January 25, 2023 School Board Meeting calculated the fiscal impact, including restricted funds, of the Board's decision to rescind the 2023 closures. The District's methodology essentially considers a school site's receipt of restricted funds as a District subsidy. However, for example, to demonstrate compliance with the Every Student Succeeds Act, a District must use a methodology that does not count a school's receipt of Title I funds against the school. Overall, cost savings calculations from potential closures should not include restricted fund expenditures unless there are specific reasons to do so beyond school closure. If the schools close, the District is required to spend special education, LCFF, and Title I restricted funds on special education and lowincome students at their new school, unless they leave the district.

• School Capacity: Under AB 1912 (c) factor of "capacity of a school," OUSD staff recommends using the metric "underutilized classrooms." This metric is problematic as applied in OUSD. In analysis leading up to the February 8, 2022 Closure Decision, the district failed to account for the high number of special day classes (SDC) at certain sites like Grass Valley and Munck, where special education students have a continuum of classes, preventing them from having to move to a different school site if an SDC is not available for a certain grade. OUSD must avoid using this criteria, which penalizes school sites serving the district's highest needs special education students, because SDC class size caps needed to appropriately serve students will appear in OUSD's calculation as low total enrollment or classroom underutilization. To assess school capacity, OUSD must use a metric that reflects the needs of special education students and does not penalize the school sites serving such students.

OUSD staff also recommends the use of four sustainability metrics in the equity analysis: total enrollment, Live/Go data, demand rate, and enrollment size compared to sustainable school size. OUSD used these metrics in making the February 8, 2022 Closure Decision, and we strongly recommend that OUSD revise or eliminate these metrics.

• Additional District Staff-Proposed Metrics:

¹³ OUSD, Staff Report: Resolution No. 2223-0036 – Rescission of School Consolidations for 2022-23 (Jan. 25, 2023) pp. 16-19, attachment to Superintendent Kyla Johnson-Trammell et al., Memorandum to Board of Education re Staff Report on Resolution No. 2223-0036 – Rescission of School Consolidations for 2022-23 (Jan. 25, 2023) < Jan. 25 Staff Report> (as of Jan. 26, 2024).

¹⁴ Id. at p. 17.

¹⁵ See 20 U.S.C. § 6321(b)(2).

¹⁶ See OUSD, Community of Schools Citywide Plan: Toward a Citywide Map (Nov. 14, 2018) p. 59 <<u>2018 Presentation</u>> (as of Jan. 26, 2024) (describing calculation of classroom capacity with no mention of SDC class sizes). OUSD staff noted reliance on the 2018 report in making the 2022 closure recommendations. See OUSD, Legislative File ID #22-0243 Staff Report (Jan. 31, 2022) p. 18, attachment to Superintendent Kyla Johnson-Trammell et al, Memorandum to Board of Education re School Consolidations for 2022-23 and 2023-24 (Feb. 8, 2022) <<u>Jan. 31 Staff Report</u>> (as of Jan. 26, 2024) ("Jan. 31 Staff Report").

The OUSD staff recommended additional metrics—(1) Live/Go data, (2) enrollment size of a school, (3) school enrollment compared to sustainable school size, and (4) demand rate—may improperly penalize schools serving students with disabilities and students who have high needs for the following reasons:

- 1. Schools with a large SDC student population will have a more negative Live/Go analysis¹⁷—since a large proportion of the students will show as attending from outside OUSD's neighborhood boundary line.
- 2. As to enrollment size and enrollment size compared to sustainable school size, SDC classes have a necessary cap on the number of students to provide a free appropriate public education (FAPE) to these students; there are generally half as many students in an SDC as a general education classroom due to the students' intensive needs. 18 OUSD's own public analysis shows that 13.3 percent of students in OUSD's ten smallest (unsustainable) elementary schools are in an SDC. In comparison, SDC students only make up 2-5 percent of OUSD's other 41 elementary schools. 19 These metrics improperly penalize schools serving these students, when the small classes are actually required to appropriately serve these children.
- 3. In addition, schools that house SDC classes have a lower demand rate because SDC families choose their school during the IEP process, ²⁰ and it is a family's designation/choice during the enrollment process (and not what is on their IEP) that OUSD uses to calculate demand rates.²¹

As such, a school with a large number of SDCs will appear in a sustainability metric calculation to be under-enrolled and costlier to run than schools with no special education students. However, closing these schools will not eliminate these costs—they would likely move to the new school hosting SDC classes, as will the funding sources supporting special education students.

Reliance on the Live/Go data is also problematic because OUSD considers a school that pulls students from the district-created neighborhood boundary lines for enrollment for that school to

¹⁷ Jan. 31 Staff Report, *supra*, at p. 20 (defining Live/Go as "rate collected to understand if students attend the school where they live").

¹⁸ See, e.g., OEA and OUSD, Agreement Between Oakland Unified School District and Oakland Education Association For the Period July 1, 2018 through June 30, 2021, pp. 79–80 < OEA Contract > (as of Jan. 26, 2024); Los Angeles Unified School District, Elementary Schools Staffing Ratios For FY 2022-23 (Aug. 2022) appen. 1, p. 25 < LAUSD Staffing Ratios > (as of Jan. 26, 2024).

¹⁹ Attachment A, item 2, emphasis added.

²⁰ See 20 U.S.C. § 1415(b)(1) (referencing "educational placement" as a required procedure of an IEP).

²¹ Jan. 31 Staff Report, *supra*, at p. 20 (defining Demand Rate as "[t]he amount of families submitting an application for the entry grade, divided by census day enrollment").

be highly sustainable. ²² (In other words, a school with a higher number of students choosing to attend from other neighborhoods in Oakland would score low on the Live/Go analysis, making it more likely to be closed.) However, a review of OUSD's public neighborhood boundary lines and neighborhood priority enrollment policy shows that existing practices result in the vast majority of students being assigned to schools in neighborhoods that replicate residential segregation patterns. ²³ Thus, a focus on Live/Go data as a metric for determining which schools to close can likewise further reinforce residential segregation patterns. In addition, using Live/Go data penalizes certain schools that Black families have chosen to attend outside of their neighborhoods, like Grass Valley and Munck, ²⁴ to access an educational experience or environment that they find desirable.

III. In Depth Analysis Needed for Other Metrics

We also recommend that the Board conduct in depth analyses as it relates to the following factors:

- Environmental Factors: Under AB 1912 (e), "environmental factors," OUSD staff recommend that the District use the CALENVIRONS Pollution Burden Index. 25 Such an analysis would be incomplete because it does not include a safety analysis. OUSD should engage in safety analysis and planning in order to satisfy the mandate of AB 1912 (e) and ensure that as many students as possible are able to travel to schools using safe routes and passages.
- Student Demographics and Feeder Attendance Patterns: Under AB 1912 (f), "balance of student demographics," OUSD recommends that the Board use "school snapshot of enrollment demographics" and that AB 1912 (i) "impact on feeder school attendance patterns" will be provided after schools are selected. ²⁶ In addition to AB 1912's mandate that this analysis "determine if the decision to close or consolidate will have a disproportionate impact on any particular demographic group[,]" ²⁷ this analysis should also include an assessment of whether or not the closure decision maintains or

Attachment A, item 3, I-580 added in red. A recent study found Oakland to be the 14th most segregated city in the United States as a whole and the most segregated city in California. See Menendian et al., The Roots of Structural Racism Project (June 21, 2021) Othering & Belonging Institute https://belonging.berkeley.edu/roots-structural-racism (as of Jan. 26, 2024); Othering & Belonging Institute, Most to Least Segregated Cities https://belonging.berkeley.edu/most-least-segregated-cities (as of Jan. 26, 2024).

²² Jan. 31 Staff Report, *supra*, at p. 20.

²⁴ See, e.g., OUSD, <u>Live/Go</u>, <u>Where students LIVE who are enrolled at each OUSD district-run school</u> (as of Jan. 25, 2024) (listing 2022-23 population data showing 158 of Munck's 179 students, and 126 of Grass Valley's 175 students, live outside the school's catchment area).

²⁵ Presentation, *supra*, at p. 15.

²⁶ Ed. Code, § 41329, subd. (a)(1)(I); Presentation, *supra*, at pp. 15-16.

²⁷ Ed. Code, § 41329, subd. (a)(1)(F).

exacerbates racial segregation or isolation.²⁸ If it does, OUSD needs to identify how it will alleviate the segregation over the long term.

- Transportation Needs: Under AB 1912 (g), "transportation needs of pupils," OUSD recommends that the impact be provided when the list of school selections are made. 29 This is too late. Public data shows that a number of OUSD's prior closure decisions, especially those impacting elementary schools, have fallen most heavily on Black families in low-income neighborhoods. 30 OUSD must assess the transportation needs of pupils during the AB 1912 process, not after it has made a decision about which schools to merge or close. Our office is willing to work with OUSD to provide a public analysis of current impacts so that OUSD can properly assess all impacts and the transportation support needs for students who may be impacted by a closure or consolidation.
- **Special Programs:** Under AB 1912 (d), OUSD must assess "[s]pecial programs available at the schools being considered for closure." To meet this criterion, OUSD should include qualitative evaluations of how schools serve certain populations of students. This analysis would, for example, include how Munck has a far lower rate of suspensions for Black students and students with disabilities than other OUSD schools. For example, Munck did not suspend any Black students or students with disabilities in school year 2018-2019 or school year 2019-2020.³¹ This is particularly important as Black students are disproportionately suspended districtwide, especially if they have a disability, and research shows a link between suspensions and lower academic performance and dropout.³²

²⁹ Presentation, *supra*, at p. 16.

²⁸ See, *supra*, fn. 2.

³⁰ Since 2012, seven of eight elementary schools closed served student populations with a significantly higher proportion of black student enrollment than the District's enrollment: Lakeview Elementary, Thurgood Marshall Elementary, Maxwell Park International Academy, Santa Fe Elementary, Lafayette Elementary, Futures Elementary, and Parker Elementary. (Annual enrollment data by ethnicity available at California Dept. of Ed., *supra*, <DataOuest> (as of Jan. 26, 2024.)

³¹ Attachment A, item 4.

³² Resolution of the Board of Education of the OUSD No. 2021-0037, attachment to Board Directors VanCedric Williams and Mike Hutchinson, Memorandum to Board of Education re Resolution No. 2021-0037 - Reparations for Black Students (Mar. 24, 2021) p. 3 Reparations Resolution (as of Jan. 26, 2024)(stating that Black students represent 22% of all OUSD students but 57% of all suspended students, and 33% of Black students in special education are nine times more likely to be suspended than other students); California School Dashboard, Oakland Unified Suspension Rate (as of Jan. 26, 2024) (showing OUSD 2023 suspension rate for African American students of 9.4% suspended at least one day, as compared to a 4% rate for all students). See also Rumberger & Losen, The Hidden Costs of California's Harsh School Discipline: And the Localized Economic Benefits From Suspending Fewer High School Students (2017) The Civil Rights Project, University of California, Los Angeles https://escholarship.org/uc/item/0x36s2wf (as of Jan. 26, 2024).

We caution against an exclusive or over reliance on quantitative metrics, without also including a qualitative assessment of how each school is serving the needs of its specific student body, especially as it relates to historically marginalized communities.

IV. Conclusion

Again, the Department's investigation concluded that the February 8, 2022 Closure Decision – if it had not been rescinded – would have disproportionately impacted Black and low-income elementary students, as well as high-need students with disabilities. In addition to the requests above, to ensure compliance with AB 1912 and anti-discrimination law, we strongly recommend that OUSD engages an independent expert to facilitate the community input and equity impact metric assessment process, and help OUSD incorporate and follow our office's guidance on school closures. We also strongly recommend that the expert provide an annual independent assessment regarding the impact on students and district enrollment for any consolidation, merger, or closure decision.

Our office will continue to monitor OUSD's processes and decision-making as it moves forward with the required community engagement, equity impact analysis, and planning to implement any school closures, mergers, or consolidations in school year 2025-26. We encourage you to engage with our office and solicit feedback and consultation at any time during the process to ensure that OUSD's process and outcomes are legally compliant and serve the best interests of the school community and all of its students.

Sincerely,

LAURA L. FAER

Supervising Deputy Attorney General

XIYUN YANG

Deputy Attorney General

For ROB BONTA Attorney General

ATTACHMENT A

1. OUSD, Quality Community Schools Action Plan (June 20, 2018) p. 6 < Quality Community Schools Presentation (as of Jan. 26, 2024) (emphasis added in red; plan adopted³³ June 27, 2018):

Addressing Our Challenges

- · Significant and pervasive structural budget troubles
- Significant achievement challenges with 16 of 87 schools rating successful on state accountability matrices
- Implementation of Board-approved strategies for improving student outcomes is being stymied by budget troubles.
- Recent analysis of assets and capacities demonstrate significant variation across communities that coincide with patterns of racial segregation, and systemic community disinvestment.



Every Student Thrives







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³³ Resolution of the Board of Education of the OUSD No. 1718-0207, attachment to Kyla Johnson-Trammell, Memorandum to Board of Education re Blueprint for Quality Schools Work Plan (June 20, 2018) < Res. No. 1718-0207 > (as of Jan. 26, 2024).

2. OUSD, Slides for the 11.14.22 CAC Meeting (Nov. 24, 2022) p. 95 http://tinyurl.com/249s3n26> (as of Jan. 26, 2024) (emphasis added in red):

District Elementary Design by School Size

Patterns within OUSD's 51 Elementary Schools

	# of Grade Level Classes		Average School Size (K-5 Students)	% Combinations Class	Empty 4-5 Seats as a % of Total Enrollment	# SDC students in school group	% SDC students
1-10 (Smallest)	1	33.0%	156	21.90%	5.08%	220	13.30%
11-20	2	59.9%	255	13.00%	6.66%	108	4.10%
21-30	2	84.7%	317	7.20%	4.07%	181	5.50%
31-40	3	68.1%	377	6.00%	2.94%	131	3.30%
40-51 (Largest)	3	113.80%	513	4.7 %	2.51%	168	2.90%

- # Grade Level Classes: Average number of classes at each grade level throughout the school.
- Families Choosing K as 1st Option: 3-year average of 1st choice on time applications divided by the number of available seats in the class.
- Average School Size: Average enrollment on the number of non-K-8 non SDC students enrolled in the school
 Parker, Hillcrest, La Escuelita, Greenleaf, MLA are represented with K-8 models in this analysis
- % Combinations Class: The number of mixed grade level classes required to provide a base program
- # SDC student in group of 10 schools: Total number of SDC students enrolled in the school
- % SDC students: Total percentage of students enrolled in SDC programming at school



3. OUSD, 2022-23 Oakland Public Schools & Boundaries (I-580 added in red. School Year 2023-24 neighborhood attendance boundaries available here.)



4. Jan. 31 Staff Report, supra, at p. 32:

Suspensions		OAKLAND UNIFIED				
	2018-19	2019-20	SCHOOL DISTRICT Community Schools, Thriving Students			
All	0.0%	0.0%	Commu	nity School	ols, Thriv	ing Student
African Amer	0.0%	0.0%				
Latino	0.0%	0.0%	Carl Munck Elementary			
English Learner	0.0%	0.0%				
Foster	0.0%	0.0%	1 Learner	2018-19 28	2019-20	2020-21
Low Income	0.0%	0.0%	come	1 153	1 158	2 150
Special Ed	0.0%	0.0%	# Ed sed	29 1	32 0	41 3
Unhoused	0.0%	0.0%				
			ES No	rtheast	Network	(3

5. California Department of Justice, OUSD School Closures Mapped onto U.S. Census Data, if OUSD had not Rescinded the February 8, 2022 Closure Decision (as of Jan. 26, 2024).

