

STATE OF NORTH CAROLINA

File No.

Johnston

County FILED

In The General Court Of Justice
District Superior Court Division

Name And Address Of Plaintiff 1
Concerned Citizens for Successful Schools
807 Baker Street
Smithfield, NC 27577

2016 FEB 13 P 4:08

GENERAL

CIVIL ACTION COVER SHEET

INITIAL FILING SUBSEQUENT FILING

Rule 5(b), General Rules of Practice For Superior and District Courts

Name And Address Of Plaintiff 2
BY [Signature]

Name And Address Of Attorney Or Party, If Not Represented (complete for initial appearance or change of address)

Mark Dorosin
UNC Center for Civil Rights
323 West Barbee Chapel Road
Chapel Hill, NC 27517

Telephone No. 919-445-0174 Cellular Telephone No. 919-225-3809

NC Attorney Bar No. 20935 Attorney E-Mail Address dorosin@email.unc.edu

VERSUS

Name Of Defendant 1
Johnston County Board of Education

Summons Submitted Yes No

Initial Appearance in Case Change of Address

Name Of Defendant 2
Ed Croom (in his official capacity as Superintendent)

Name Of Firm
UNC Center for Civil Rights
FAX No. 919-843-6748

Summons Submitted Yes No

Counsel for
All Plaintiffs All Defendants Only (list party(ies) represented)

Jury Demanded In Pleading
Complex Litigation

Amount in controversy does not exceed \$15,000
Stipulate to arbitration

TYPE OF PLEADING

- (check all that apply)
Amend (AMND)
Amended Answer/Reply (AMND-Response)
Amended Complaint (AMND)
Assess Costs (COST)
Answer/Reply (ANSW-Response) (see Note)
Change Venue (CHVN)
Complaint (COMP)
Confession Of Judgment (CNJF)
Consent Order (CONS)
Consolidate (CNSL)
Contempt (CNTP)
Continue (CNTN)
Compel (CMPL)
Counterclaim (CTCL) Assess Court Costs
Crossclaim (list on back) (CRSS) Assess Court Costs
Dismiss (DISM) Assess Court Costs
Exempt/Waive Mediation (EXMD)
Extend Statute Of Limitations, Rule 9 (ESOL)
Extend Time For Complaint (EXCO)
Failure To Join Necessary Party (FJNP)

- (check all that apply)
Failure To State A Claim (FASC)
Implementation Of Wage Withholding In Non-IV-D Cases (OTHR)
Improper Venue/Division (IMVN)
Including Attorney's Fees (ATTY)
Intervene (INTR)
Interplead (OTHR)
Lack Of Jurisdiction (Person) (LJPN)
Lack Of Jurisdiction (Subject Matter) (LJSM)
Modification Of Child Support In IV-D Actions (MSUP)
Notice Of Dismissal With Or Without Prejudice (VOLD)
Petition To Sue As Indigent (OTHR)
Rule 12 Motion In Lieu Of Answer (MDLA)
Sanctions (SANC)
Set Aside (OTHR)
Show Cause (SHOW)
Transfer (TRFR)
Third Party Complaint (list Third Party Defendants on back) (TPCL)
Vacate/Modify Judgment (VCMD)
Withdraw As Counsel (WDCN)
Other (specify and list each separately)

NOTE: All filings in civil actions shall include as the first page of the filing a cover sheet summarizing the critical elements of the filing in a format prescribed by the Administrative Office of the Courts, and the Clerk of Superior Court shall require a party to refile a filing which does not include the required cover sheet. For subsequent filings in civil actions, the filing party must either include a General Civil (AOC-CV-751), Motion (AOC-CV-752), or Court Action (AOC-CV-753) cover sheet.

K

STATE OF NORTH CAROLINA **FILED** IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
COUNTY OF JOHNSTON 2015 FEB 18 P 4:08 CVS. _____

CONCERNED CITIZENS FOR SUCCESSFUL SCHOOLS,)
BY _____) KW

Plaintiffs,)

v.)

COMPLAINT

THE JOHNSTON COUNTY BOARD OF EDUCATION d/b/a Johnston County Schools; and DR. EDWARD CROOM, in his capacity as Superintendent of Johnston County Schools,)

Defendants.)

INTRODUCTION

This is a complaint pursuant to the North Carolina Public Records Act, N.C.G.S. § 132-1 et. seq., and seeks the release of public records held and maintained by the Johnston County Board of Education.

PARTIES

1. Plaintiff Concerned Citizens for Successful Schools (hereinafter, "CCSS") is an unincorporated, community-based association in Johnston County. Its members have worked for several years for the advancement and improvement of public education in Johnston County.

2. Defendant Johnston County Board of Education (hereinafter, the "Board") is a local board of education, as defined in N.C. Gen. Stat. § 115C-5(5). The Board is a corporate body vested with general control and supervision over public schools in Johnston County by the

laws of the State of North Carolina. The Board is a body politic with the capacity to sue and be sued, pursuant to N.C. Gen. Stat. § 115C-40.

3. Defendant Edward Croom is the superintendent of Johnston County Schools. Dr. Croom is employed by the Board and is responsible for the operations of public schools in Johnston County. Pursuant to the statutory duties of the Superintendent listed in N.C. Gen. Stat. § 115C-276 and N.C. Gen. Stat. § 132-2, Dr. Croom is the custodian of records for Johnston County Board of Education.

JURISDICTION AND VENUE

4. Johnston County Superior Court has jurisdiction over this matter pursuant to N.C. Gen. Stat. § 132-9. This section of the Public Records Act provides that “any person who is denied access to public records for purposes of inspection and examination, or who is denied copies of public records, may apply to the appropriate division of the General Court of Justice for an order compelling disclosure or copying, and the court shall have jurisdiction to issue such orders.” N.C. Gen. Stat. § 132-9(a).

5. Venue is proper in Johnston County pursuant to N.C. Gen. Stat. §§ 1-77 and 1-82. The parties are based in Johnston County and a substantial part of the matters described in this Complaint occurred in Johnston County.

FACTUAL ALLEGATIONS

6. On May 29, 2015, CCSS, through counsel, mailed the Board a public records request (hereinafter, “Request”), attached hereto as Exhibit 1, pursuant to the North Carolina Public Records Act, N.C. Gen. Stat. § 132-1 et. seq.

7. On October 19, 2015, Defendants responded to the Request with a cover letter, attached hereto as Exhibit 2, and a number of records.

8. The records Defendants provided in response to the Request did not fully respond to Paragraphs 2, 3, 5, 7, 8, and 9 of the Request.

9. Paragraph 2 of the Request sought records related to the racial and ethnic demographics of each attendance area, student assignment nodes, or other geographic areas used by the Board in student assignment.

10. Paragraph 3 of the Request sought records pertaining to student assignment and the racial and socioeconomic demographics of the school district since 2012.

11. Paragraph 5 of the Request sought records pertaining to students attending charter schools who would otherwise be assigned to JCS, disaggregated by race, Limited English Proficiency (LEP)/non-LEP, and economically disadvantaged/non-economically disadvantaged.

12. Paragraph 7 of the Request sought records pertaining to teacher turnover in the Smithfield-Selma High School attendance area, including incentives, recruitment programs, or other transfer policies/efforts by the JCS.

13. Paragraph 8 of the Request sought a list and/or map of student assignment nodes in JCS, including racial, socioeconomic, LEP/non-LEP, student achievement, and other demographic or statistical information that JCS maintains for each node.

14. Paragraph 9 of the Request sought records related to student transfers in the JCS system, from 2004-2005 through 2014-2015, including information on the rationale for granting or denying student transfer requests, as well as disaggregated data related to the race, LEP/non-LEP status, and economically disadvantaged/non-economically disadvantaged status of students transferring in or out of each school in the JCS system.

15. With regard to the requested racial and other demographic data (ethnicity, limited English proficiency, economically disadvantaged), the Defendant responded that it does “not create or maintain” any such records or data.

16. On December 2, 2015, CCSS, through counsel, sent an annotated copy of the Request (hereinafter, the “Second Request”), attached hereto as Exhibit 3.

17. The Second Request specifically identified records that Defendants failed to provide CCSS in response to the Request.

18. The Second Request noted that Defendants provided no racial or other demographic data in response to Paragraph 2 of the Request.

19. The Second Request noted that Defendants provided no school-level racial demographic data in response to Paragraph 3 of the Request.

20. The Second Request noted that Defendants provided no disaggregated data related to charter students who would otherwise be assigned to JCS, in response to Paragraph 5 of the Request.

21. The Second Request stated that Defendants provided no records regarding incentives, recruitment efforts, teacher transfer programs, or other teacher retention policies in response to Paragraph 7 of the Request.

22. The Second Request stated that Defendants provided no disaggregated demographic data for student assignment nodes in their response to Paragraph 8 of the Request.

23. The Second Request noted that Defendants provided no disaggregated student transfer data in their response to Paragraph 9 of the Request.

24. The Second Request reiterated that, as stated in the Request, CCSS was not seeking personally identifiable information, but rather total numbers for relevant disaggregated demographics groups.

25. The Second Request sought clarification of Defendants' position regarding the missing disaggregated demographic data, and asked again whether that data would be provided.

26. On January 15, 2016, approximately six weeks after the Second Request and nearly eight months from the original Request, CCSS received, through counsel, an email response from Traci Peedin-Jones, Public Information Officer of Defendant Johnston County Schools.

27. Ms. Peedin-Jones' email indicated that "We are in the process of reviewing the request and gathering the information that you have requested. I will get back with you once this request has been processed."

28. In this email response, Ms. Peedin-Jones did not clarify whether Defendants create or maintain the missing requested records or would make such records available, as requested in the Second Request.

29. To date, CCSS has received no additional response from Defendants following the January 15 email from Ms. Peedin-Jones.

30. Upon information and belief, all school districts in North Carolina, have, maintain, and are regularly required to report to federal and state agencies a range of educational and demographic data, disaggregated by the categories described in the Request.

31. The public records sought in the Request do not contain personally identifiable or otherwise private information, and are not exempt from disclosure under the Public Records Act.

CLAIM FOR RELIEF

Violation of the North Carolina Public Records Act, N.C. Gen. Stat. § 132-1 et seq.

32. Plaintiff re-alleges and incorporates by reference the preceding allegations in this Complaint, as if fully set forth herein.

33. Plaintiff has a right to obtain copies of "public records and public information compiled by the agencies of North Carolina government or its subdivisions," including Defendants. N.C. Gen. Stat. § 132-1(b).

34. Defendants' failure to provide Plaintiff the requested public records violates the North Carolina Public Records Act's requirement that "[e]very custodian of public records shall permit any record in the custodian's custody to be inspected and examined at reasonable times . . . and shall, as promptly as possible, furnish copies thereof upon payment of any fees as may be prescribed by law." N.C. Gen. Stat. § 132-6(a).

REQUEST FOR RELIEF

In light of the foregoing allegations and claims, Plaintiff respectfully requests that the Court:

1. Find and conclude that Defendants' continued failure to provide Plaintiff the requested public records violates the North Carolina Public Records Act, N.C. Gen. Stat. § 132-1 et. seq.;
2. Order the Defendants to provide the requested public records to Plaintiff;

3. Award Plaintiff its costs and reasonable attorneys' fees, pursuant to N.C. Gen.

Stat. § 132-9(c); and

4. Grant such other and further relief as the Court may deem just and proper.


Respectfully submitted this the 18th day of February, 2016.



Mark Dorosin
NC Bar # 20935
dorosin@email.unc.edu

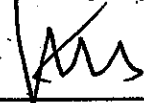


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Attorneys for Plaintiffs



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THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

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T 919.445.9195
F 919.445.6748

May 29, 2015

Dr. Ed Croom, Superintendent
Johnston County Schools
P. O. Box 1336
Smithfield, NC 27577

VIA E-mail and U.S. Mail

Dear Dr. Croom:

Pursuant to the North Carolina Public Records Act, N.C. Gen. Stat. 132-1 et seq., we respectfully request that your office provide the following public records. Please note, consistent with the statute and as used in the request, "records" includes "documents, papers, letters, maps, books, photographs, films, sound recordings, magnetic or other tapes, electronic data-processing records, artifacts, or other documentary material, regardless of physical form or characteristics, made or received pursuant to law or ordinance in connection with the transaction of public business," including board member and administrative staff emails, correspondence, notes, or text messages. Please also note that while several of these requests seek records disaggregated by race, Limited English Proficiency (LEP)/non-LEP, and economically disadvantaged/non-economically disadvantaged, this request does not seek any personally identifiable information, but only the total numbers of students disaggregated by each demographic category

1. All records related to or concerning any program, policy, or other effort by Johnston County Schools specifically targeted to schools or students in the Smithfield-Selma High School and each of its feeder schools (Selma Elementary, Selma Middle, Smithfield Middle, South Smithfield Elementary, West Smithfield Elementary, Wilson's Mills Elementary) including but not limited to:
 - a. Identification and description of the program, policy or effort;
 - b. Specific budget and costs, including the specific source of funds;
 - c. Number of students enrolled or participating;
 - d. Any prerequisites or requirements for participation;
 - e. Specific schools at which each program is available;
 - f. Whether the program is open to students district-wide;
 - g. Whether a similar program is offered at any school outside of the Smithfield-Selma attendance areas, and if so, at which schools; and
 - h. Any evaluations of such programs, and the methods of evaluation used for measuring impact or success of each program.
2. Any records relating to the racial and ethnic demographics of each attendance area, student assignment node, or other geographic area or zone used by the Johnston County Board of Education to assign students to particular schools, from 2010 to the present.
3. Any records which relate to or concern student assignment or reassignment, redistricting, or the racial or socio-economic demographics in JCS schools, from 2012 to the present.

EXHIBIT

4. Any records which relate to or concern the Citizens Study Commission, from 2013 to the present.
5. Any records relating to or concerning the number of students otherwise assigned to JCS schools that are attending charter schools, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged, from 2012 to the present.
6. Any records relating to the selection of sites for new school facilities, from 2004 to the present.
7. Any records related to or concerning teacher turnover in the schools in the Smithfield Selma High school and each of its feeder schools, including but not limited to any teacher incentive, recruitment, or transfer programs, policies or efforts of JCS.
8. A list or map of population nodes used to create attendance area boundaries, including any overall racial, socioeconomic, LEP/non-LEP, student achievement, or other demographic or statistical information maintained for each node.
9. From the 2004-2005 school year through the 2014-15 school year, any records concerning transfer requests of students from an assigned school to another school within the district, including for each such request, any records regarding
 - a. the school that the student was zoned to attend
 - b. the school to which the student sought to transfer
 - c. whether the transfer was granted or denied
 - d. the rationale for granting or denying the transfer
 - e. overall totals of transfers into and out of each school, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged.
10. Current capacity, enrollment, and date of construction for each school in the district.

We request that any material available in electronic format be provided in that form. Additionally, because we are a not-for-profit organization, we request that you waive any fees for copies or administrative time involved in fulfilling this request.

Thank you for your consideration. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Mark Dorosin
Managing Attorney
919-445-0174
dorosin@email.unc.edu

C: Concerned Citizens for Successful Schools



JOHNSTON COUNTY SCHOOLS

P.O. Box 1336 • SMITHFIELD, NC 27577
919.934.6031 • 919.934.2586 (FAX)

October 19, 2015

The University of North Carolina at Chapel Hill
UNC Center For Civil Rights
School of Law Annex
323 W. Barbee Chapel Rd.
Campus Box 3382
Chapel Hill, NC 27517

To Whom It May Concern:

In response to your request, please find enclosed the following:

1. All records related to or concerning any program, policy, or other effort by Johnston County Schools specifically targeted to schools or students in the Smithfield-Selma High School and each of its feeder schools.

Reference material included:

Notebooks with requested information for

- Selma Elementary
- Selma Middle
- Smithfield Middle
- Smithfield-Selma High
- South Smithfield Elementary
- West Smithfield Elementary
- Wilson's Mills Elementary

2. Any records relating to the racial and ethnic demographics of each attendance area, student assignment node, or other geographic area or zone used by the Johnston County Board of Education to assign students to particular schools, from 2010 to the present.

Johnston County Schools does not create or maintain racial and ethnic demographics of attendance areas, student assignment nodes or other geographic areas/zones.

Reference material included:

EXHIBIT

2

Johnston County Board of Education Policy Code: 4100

Johnston County Board of Education Regulation Code: 4100-R

3. Any records which relate to or concern student assignment or reassignment, redistricting, or the racial or socio-economic demographics in JCS schools, from 2012 to the present.

Redistricting has not occurred in Johnston County Schools within the time frame provided. Additional records relating to student reassignment are located with documents in section #9.

Reference material included:

Johnston County Board of Education Policy Code: 4100

Johnston County Board of Education Regulation Code: 4100-R

Numbers Talk – 12 Facts about Johnston County Schools Brochure 2012 Edition

Numbers Talk – 12 Facts about Johnston County Schools Brochure 2013 Edition

District Profile 2014-2015 – Johnston County Schools Webpage

Percentage of Free and Reduced by School 2012-2013

Percentage of Free and Reduced by School 2013-2014

Percentage of Free and Reduced by High School March 2014

Percentage of Free and Reduced by School 2014-2015

4. Any records which relate to or concern the Citizens Study Commission, from 2013 to the present.

Reference material included:

Citizens' Study Commission Notes from the August 12, 2013 Meeting

Citizens' Study Commission Letter July 15, 2014

April 2014 Johnston County Board of Education Meeting - Public Comment by Susan Lassiter:

<http://vimeopro.com/johnstoncountyschools/2014-board-of-education-videos/video/91659244>

April 2014 Johnston County Board of Education Meeting Agenda

Smithfield-Selma Area Information

Presentation to Selma Town Council, April 14, 2015

Press Release April 23, 2015

Status quo isn't making schools better

Busing by any other name is still busing

Emails concerning Citizens' Study Commission

5. Any records relating to or concerning the number of students otherwise assigned to JCS schools that are attending charter schools, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged, from 2012 to the present.

Johnston County Schools does not have records of race, LEP status or economic status of charter school attendees assigned to JCS.

Reference material included:

Charter School Numbers by Year

6. Any records relating to the selection of sites for new school facilities, from 2004 to the present.

Reference material included:

Johnston County Schools Enrollment Projections (2004-2005)

Facility Needs 2006 – Phase Two

Discussion and Explanation Points Facilities 2008

Bond Referendum Recommendation- 2007

Schools buy land for new Princeton Elementary

Facility Needs 2008 – Phase One

Facility Needs 2008 – Phase Two

Johnston County Schools Out of Capacity Worksheet February 2008

Vote YES Twice

New NW Middle School land purchased

Cleveland Elementary PTA and Parent Advisory Council

March 21, 2005 May Educational Facilities Bond Issue

Facilities 2008 Bond Projects

One school no longer fits all

Opinion

Johnston County Schools Upcoming Bond Projects

\$99 million bond referendum proposal

Johnston County Schools Out of Capacity Worksheet – 2003

Johnston County Schools Out of Capacity Worksheet – January 2004

Johnston County Schools Out of Capacity Worksheet – November 2004

Site List – Building Dates/Renovations

October 5, 2009 Letter to Johnston County Board of Commissioners

February 11, 2005 Board Exhibit

February 11, 2005 Minutes

February 11, 2005 Agenda

Johnston sets May referendum on school, college bonds

IPSAC Land Use Study Report January 31, 2008

Johnston County Schools 2012-2013 IPSAC Update

Johnston County Schools Out of Capacity Worksheet – January 2012

IPSAC Land Use Study Report April 28, 2014

Check it Twice

Integrated Planning for School Community

JCS Board Bulletin January 14, 2014

JCS Board Bulletin February 11, 2014

JCS Board Bulletin April 14, 2015

Minutes - Site Purchase – Benson Middle School

Minutes - Acquisition of Land for Northwest Middle School

Johnston County Board of Education Minutes February 11, 2005

Johnston County Board of Education Minutes March 29, 2006

Johnston County Board of Education Minutes – October 2007

Johnston County Board of Education Minutes – Acquisition of Land

Johnston County Board of Education Minutes – 115

Johnston County Board of Education Minutes – Update on Bond Projects

Johnston County Schools Facilities Plan 2013

Johnston County Board of Education Minutes – Update on Bond Projects

Johnston County Board of Education Minutes

7. Any records related to or concerning teacher turnover in the schools in Smithfield-Selma High School and each of its feeder schools, including but not limited to any teacher incentive, recruitment, or transfer programs, policies or efforts of JCS from 2012 to the present.

Reference material included:

Teacher Turnover 2013-2014

Teacher Turnover 2012-2013

Screen Shot of Transfer procedures

8. A list or map of population nodes used to create attendance area boundaries, including any overall racial, socioeconomic, LEP/non-LEP, student achievement, or other demographic or statistical information maintained for each node from 2010 to present.

Johnston County Schools does not create or maintain racial, socioeconomic, LEP/non-LEP status, student achievement or other demographic data for nodes.

Reference material included:

Number of students living in each segment and number of parcels that make up each segment

Maps of nodes

9. From the 2004-2005 school year through the 2014-2015 school year, any records concerning transfer requests of students from an assigned school to another school within the district, including for each such request, any records regarding:
- a. the school that the student was zoned to attend
 - b. the school to which the student sought to transfer
 - c. whether the transfer was granted or denied
 - d. the rationale for granting or denying the transfer
 - e. overall totals of transfers into and out of each school, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged.

Johnston County Schools does not create or maintain LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged data for reassignments and has not created or maintained race data in reassignment processes since the 2004-2005 school year.

Reference material included:

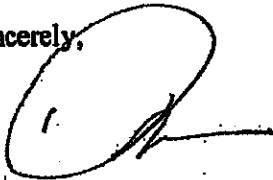
2014-2015 Reassignments
2013-2014 Reassignments
2012-2013 Reassignments
2011-2012 Reassignments
2010-2011 Reassignments
2009-2010 Reassignments
2008-2009 Reassignments
2007-2008 Reassignments
2006-2007 Reassignments
2005-2006 Reassignments
2004-2005 Reassignments

10. Current capacity, enrollment, and date of construction for each school in the district.

Reference material included:

Johnston County Schools Out of Capacity Table - March 5, 2015
Site/Construction Date/Renovation Date Chart

Sincerely,



Dr. H. Edward Croom
Superintendent
Johnston County Schools



UNC
SCHOOL OF LAW

THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

UNC CENTER FOR CIVIL RIGHTS

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T 919-443-8195
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December 2, 2015

Dr. Ed Croom, Superintendent
Tracey Peedin-Jones, Public Information Officer
Johnston County Schools
P. O. Box 1336
Smithfield, NC 27577

VIA E-mail and U.S. Mail

Dear Dr. Croom & Ms. Peedin-Jones:

Thank you for providing the public records in response to the request sent from our office on May 29. We have closely reviewed all the all documents, and have identified some specific information that was requested to which no responsive materials were provided. For your convenience, we have included the original request and the information still missing below, with each numbered as it was in the original request.

As a preliminary matter, many of our requests sought records disaggregated by race, ethnicity, LEP/non-LEP, economically disadvantaged/non-economically disadvantaged. To reiterate what was stated in our original request, we are not seeking any personally identifiable information, but only records of the total numbers or percentages of students disaggregated by each demographic category.

Your October 19 letter states that Johnston County Schools does not maintain any records disaggregated by these categories, which is somewhat surprising given our experience working with other school districts and that much of this disaggregated data has to be collected and provided to the Department of Public Instruction. Please clarify whether these records are available and can be provided, or that the district's response is that it does not have, keep, or maintain any records related to student demographics in any of the categories requested (i.e., attendance areas, assignment nodes, charter attendance, student transfers).

2. Any records relating to the racial and ethnic demographics of each attendance area, student assignment node, or other geographic area or zone used by the Johnston County Board of Education to assign students to particular schools, from 2010 to the present.

- We were provided maps showing the attendance nodes and the number of students in each node, but no racial or other demographic data.

3. Any records which relate to or concern student assignment or reassignment, redistricting, or the racial or socio-economic demographics in JCS schools, from 2012 to the present.

- We received overall district level racial demographics, but no school level racial demographic data was provided.

EXHIBIT

3

5. *Any records relating to or concerning the number of students otherwise assigned to JCS schools that are attending charter schools, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged, from 2012 to the present.*

- We received overall district level data, but no disaggregated records.

7. *Any records related to or concerning teacher turnover in the schools in the Smithfield Selma High school and each of its feeder schools, including but not limited to any teacher incentive, recruitment, or transfer programs, policies or efforts of JCS.*

- We received teacher turnover percentages for the schools for 2012-13 and 2013-14 school years. Please provide data for 2010-11, 2011-12, and 2014-15. No records regarding incentives, recruitment, teacher transfer programs or other teacher retention policies were provided.

8. *A list or map of population nodes used to create attendance area boundaries, including any overall racial, socioeconomic, LEP/non-LEP, student achievement, or other demographic or statistical information maintained for each node.*

- We received attendance area maps with overall student numbers, but no disaggregated records were provided (See #2, above).

9. *From the 2004-2005 school year through the 2014-15 school year, any records concerning transfer requests of students from an assigned school to another school within the district, including for each such request, any records regarding*

- the school that the student was zoned to attend*
- the school to which the student sought to transfer*
- whether the transfer was granted or denied*
- the rationale for granting or denying the transfer*
- overall totals of transfers into and out of each school, disaggregated by race, LEP/non-LEP, and economically disadvantaged/non-economically disadvantaged.*

- We received no disaggregated records (subpart e) with the information for subparts a-d.

Thank you for your consideration. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely



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Managing Attorney
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dorosin@email.unc.edu

C: Concerned Citizens for Successful Schools
Jim Lawrence, School Board Attorney