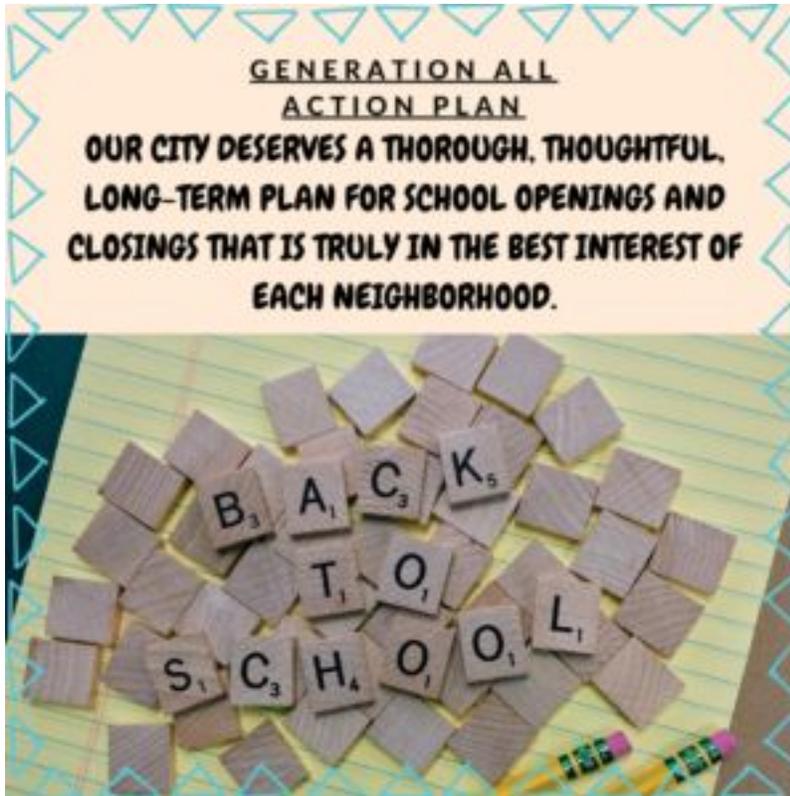


GENERATION ALL'S PUBLIC COMMENTS ON THE 2017-2018 DRAFT SCHOOL ACTIONS GUIDELINES

OCTOBER 25, 2017



Generation All works to unite Chicagoans in revitalizing neighborhood public high schools so all students experience high-quality learning opportunities both in and outside the classroom with the support of the wider community. In this vein, we are submitting feedback on the 2017-2018 draft guidelines for school actions.

In April 2016, the Generation All steering committee released its action plan, *Strong Neighborhood High Schools for a Stronger Chicago*, in which we call for a citywide, neighborhood-informed plan for all high school actions before any new school actions take place. If implemented with authenticity and integrity, a citywide, neighborhood-informed plan will address the root causes of family frustration around transitioning to high school: 1) the oversupply of high schools that leads to competition and severely

under-enrolled schools in the neediest neighborhoods, and 2) the unequal distribution of equitably-resourced high schools across the city.

A citywide, neighborhood-informed plan will also lead to more community engagement and ownership of our school district. This process would embody the third CPS commitment of Integrity in “Success Starts Here,” CPS’ three-year vision:

CPS will demonstrate integrity in all its relationships through clear, honest communication; by achieving results and by respecting the expertise in our diverse communities.

We urge CPS and Mayor Emanuel to put a hold on any newly proposed school actions until a public and transparent facilities master plan for high schools is developed through a robust public engagement process.

These draft guidelines on school action demonstrate the need for a citywide, neighborhood-informed plan. First, the CPS Space Utilization Standards are mentioned several times as a key determinant of whether a school action can occur. However, the updated data will not be released until December 2017, which is after the window of opportunity for public comment on these guidelines. Furthermore, it is unclear whether the utilization formula itself will change and whether the utilization data will be from school year 2016-17 or from this current school year. Because CPS failed to publish updated utilization data in December of 2016, it is out of compliance with 105 ILCS 5/34-205. Therefore, school actions should be suspended for this year. The failure of CPS to publish and update the utilization formula and data during this period of public comment highlights the need for clear school action guidelines that are linked to a citywide, neighborhood-informed plan.

Next, we commend the draft guidelines for prioritizing the agency of the school principal, parents, or community members to initiate the school action process, but Generation All recommends that the guidelines outline a clear process for cases in which the school principal, parents, or community members

do not agree on the school action. Could a single parent's demand for a new school or a school closure initiate a school action? The language appears to invite conflict. **We recommend replacing the word "or" with the word "and" in each instance of this list of stakeholders so that consensus must be reached before moving forward on a school action.** We would also remind CPS that Local School Councils are a pre-existing, democratically elected body that should be explicitly named in the list of stakeholders. We recommend that all LSCs impacted by a school action be engaged in the decision-making process and that a clear consensus emerges among the principal, parents, community members, and the LSCs. Requiring consensus will help all parties feel heard and respected and further build trust in CPS.

Considering the disproportionate impact school closings have had on communities of color in Chicago, a racial equity analysis, such as those put forth by the Government Alliance on Race and Equity (GARE) from RaceForward, should be required for every school action. Because of the significant levels of racial and ethnic segregation and disparities in the school district, CPS should commit to ensure that school actions do not lead to negative impacts on our most under-resourced and marginalized students.

Thirdly, each type of school action contains a catch-all for other criteria that the CEO may consider, such as safety and security, school culture and climate, school leadership, quality of the facilities, transition costs, the academic performance of the schools, etc. As a government entity, CPS should have a more detailed and transparent process for how these criteria will be used in school actions decisions. Is there a rubric? Do weights exist for how important each of these criteria are? What determines whether a criterion will play a role in the decision or not? These are questions that should be explained for the public instead of obscuring the criteria in ambiguous language. In addition, other factors that take neighborhood characteristics into account should be included, such as neighborhood poverty, violence rates, and the potential support or absence of other public institutions. Schools are not islands. They serve as anchors for the neighborhood. Metrics used to determine their future should incorporate indicators of community development and health. The complex and vital role schools play in neighborhoods is well-supported by

research and illustrates the need for school actions to come out of a comprehensive citywide plan that is neighborhood-informed.

Next, considering that CPS is still suffering from a fiscal crisis that will extend into the foreseeable future, the school action guidelines should contain language that requires a transparent financial analysis prior to any school action. For example, the funds to build a new school might be better spent renovating an older school, or the district might shift an attendance area to move students towards under-enrolled school rather than paying for a school expansion. Requiring a financial analysis will contribute to the repair of CPS' public image by demonstrating that CPS is a wise steward of the public's tax money.

Finally, the school action guidelines should include and pertain to school openings as well as closings and co-locations. From the public's perspective, there appears to be no decision-making process for the timing and location of school openings. This creates a sense that school openings occur randomly or are linked to backroom political deals. Although school openings are impacted by the state charter school commission, CPS and CTU have committed to collaborate to curb the commission's power to overrule CPS. A clear protocol for school openings that includes an impact analysis on the enrollment numbers and demographics of the schools already serving the community will help rebuild the public's trust in CPS.

While we are heartened by the invitation for the public to participate in this comment process, the opportunity is only as valuable and valid as its outcome. Generation All expects that that CPS will conduct a thorough review of these comments and hold on school actions this year until there is a comprehensive plan for all schools. In subsequent years, school action decisions must go through several layers of public analysis, including a racial equity analysis, a financial analysis, and an impact analysis on pre-existing schools. CPS must take advantage of an opportunity here to craft processes that will lead to all students accessing well-resourced schools. We have an opportunity to truly engage all Chicago communities in an authentic public engagement process. A neighborhood-informed citywide plan for our schools will provide a platform for rational, stable and sustainable planning as well as a pathway towards a system that all parents and community members can believe in.