



LOUDOUN COUNTY PUBLIC SCHOOLS

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December 11, 2019

VIA EMAIL AND REGULAR MAIL

The Honorable Mona Siddiqui
Assistant Attorney General
Office of the Attorney General
202 North Ninth Street
Richmond, Virginia 23219

Dear Ms. Siddiqui: *Mona*

On October 3, 2019, you requested that the Loudoun County Public Schools (“LCPS” or “Division”) provide you information regarding a complaint that you received “alleging that African-American students enrolled in [LCPS] have been denied an equal opportunity to participate in LCPS’ Academies of Loudoun programs.” You also requested that LCPS provide you information regarding steps that LCPS has taken to address issues identified in the initial report entitled “Systemic Equity Assessment: A Picture of Racial Equity Challenges and Opportunities in Loudoun County Public School District” (“Equity Report”) conducted by the Equity Collaborative, which was submitted to the Superintendent by the Equity Collaborative on June 6, 2019. The Equity Report was commissioned by the Superintendent to assist LCPS in identifying inequities in the Division.

In your October 3, 2019 letter, you also requested that LCPS provide you with information regarding the Academies of Loudoun (“Academies”). The request included information on the “[m]ethod used to recruit students to apply” to the Academies, “the criteria used to evaluate students and make admissions decisions,” the number of students who applied and were offered a seat, disaggregated by race, ethnicity and gender, and steps to address “apparent statistical disparities” in African American students who applied to the Academies and who were offered seats in the programs offered by the Academies. On November 4, 2019, we provided you the criteria and data that you requested. Following that submission, you requested in a telephone conversation that we provide you with a narrative regarding the Academies as part of its submission.

You agreed that LCPS could provide its responses to your October 3, 2019 letter on December 11, 2019. In telephone conversations, you requested that we provide you certain information regarding the requests in your October 3, 2019 letter, and LCPS provided you these responses on November 4, 2019 and on November 26, 2019. This letter provides responses to the remaining requests. The responses to your request for information regarding the Academies is provided in Section I of this letter and the responses for information regarding the Equity Report are

provided in Section II of this letter. In Section III of this letter, we summarize our responses to your requests regarding the status of the LCPS' "comprehensive equity plan" and the Minority Student Achievement Advisory Committee ("MSAAC"), which were provided to you in our November 26, 2019 letter.

I. Academies of Loudoun

Overview of the Academies of Loudoun Programs. The Academies of Loudoun ("Academies") offers two four-year programs that begin in ninth grade – the Academy of Engineering & Technology ("AET") and the Academy of Science ("AOS"). It also offers two programs that are two-year programs that begin in the 11th grade – Advanced Academy of Engineering & Technology ("AdvAET") and multiple one- and two-year pathways in Monroe Advanced Technical Academy ("MATA").

The Academies opened beginning with the 2018-19 school year when its new building was completed. Thus, the Academies is now in its second full year of operation. Prior to the 2018-19 school year, the Division had operated smaller AOS, AET and MATA programs at three separate sites under three different administrators.

The AET program is an advanced academic program for students in grades nine through 12, which provides science, technology, engineering and mathematics pathways for students to study engineering, information technology and entrepreneurship. Students in this program develop "creative and enterprising capacities, engage in research and engineering and learn skills to read write and communicate at the college level." Students interested in the AET program apply in the fall of eighth grade for 150 seats available in ninth grade.

The AOS program is an advanced academic program for students in grades nine through 12, which provides students the opportunity to engage in in-depth study in mathematics, science and research. Students in this program explore connections in sciences, math and the humanities, develop skills to ask high-level scientific questions and to conduct research and experimentation and learn to read, write and communicate at the university level. Students who want to enroll in the AOS program apply in fall of eighth grade for 120 seats available in ninth grade.

The AdvAET program is designed for students in grades 11 and 12 and focuses on two pathway choices – engineering and information technology. Students who wish to apply for this program apply in the winter of 10th grade for the 50 seats available – 25 seats for the engineering pathway and 25 for the information technology pathway – when they enter 11th grade.

The MATA program is for students in grades 10, 11 and 12. This program provides Career & Technical Education ("CTE") pathways that prepare students for 21st century college and careers. There are 15 one-year MATA pathways for students in grades 10, 11 or 12 and they include: biotechnology; health informatics; emergency medical technician; veterinary science; CISCO; auto collision repair; building construction and culinary arts. There are 12 two-year MATA pathways for students in grades 11 and 12 and these pathways include: biomedical technology; pharmacy technology; radiology technology; cybersecurity and cosmetology. Students who want to enroll in the MATA two-year pathways apply in the Winter of 10th grade for 20-24 seats in each pathway, depending on OSHA and other class size requirements, available when they enter 11th grade. Students who want to enroll in the MATA one-year

pathways apply in the Winter of 10th or 11th grade for 20-24 seats in each pathway available when they enter 11th or 12th grade.

All four of the programs are part-time programs with students attending the Academies programs in which they were enrolled and their home schools on an alternating day schedule. Graduating students receive a diploma from their home high schools. The Division provides transportation for students to attend the Academies.

Outreach and Recruitment. The Division has developed and implemented a broad range of outreach and recruitment activities to attract students to the four programs offered at the Academies. The Division has developed and revised these activities based on experience from the previous school year and input from Division staff and staff at middle and high schools. In developing and revising outreach and recruitment activities, the Division has included activities and strategies to recruit underrepresented students, including African American, Hispanic, English Learners and low income students.

One of the important commitments that the Division has made to assist recruitment and outreach is to hire a dedicated admissions team (“Admissions Team”) for the Academies and it increased this staff after the first year of operation of the Academies. For example, the Division created two positions – an admissions coordinator and outreach specialist – to assist the principal and her leadership team with outreach and recruitment activities for the 2018-19 school year. Based on the experience in outreach and recruitment for the 2018-19 school year, including the extent, importance and complexity in recruiting students from all 16 middle schools in the Division for the AET and AOS programs and all 16 high schools in the Division for the AdvAET and MATA programs, the Division added an additional outreach specialist for recruitment and outreach for the 2019-20 school year.

The admissions coordinator is responsible for working with the principal and the admission specialists to implement outreach and recruitment strategies and the admissions process. The coordinator’s responsibilities include overseeing the recruitment, evaluation and admission process, including directing the admission process and communicating the admission information and process to all secondary schools in LCPS.

The admission specialists work with the principal and the admission coordinator to implement the admission process. Two important responsibilities of the admission specialists are to develop strategies to recruit underrepresented populations and to assist the coordinator in developing programs for underrepresented populations that generate interest in STEM.

To ensure that the Academies Admission Team is sensitive to and aware of possible inequities and potential bias in recruiting underrepresented populations, particularly African American, Hispanic, English Learner and low income, the Admission Team has participated in professional development offered by the Division and has engaged in additional individual professional development. For example, the Admission Team participated in Equity in the Center workshops offered by the Division. In addition, the Admission Team engaged in a book study of *Recruiting and Retaining Culturally Different Students in Gifted Education*.

The Academies implements outreach and recruitment activities at the Division level for all four of the Academies programs at all 16 middle schools for the AET and AOS programs and at all 16

high schools for the AdvAET and MATA programs. At the Division level, for example, in the Fall of each school year, the Admission Team holds a number of information nights for AET and AOS at strategic locations throughout the Division so that parents/guardians and students have equitable access to attend these sessions.

In the fall of 2018, the Admission Team held five information sessions at five schools. In the Fall of 2019, the Admission Team increased the number of information sessions to eight schools – Riverside High School, Sterling Middle School, Freedom High School, Harmony Middle School, Independence High School, Dominion High School, Farmwell Station Middle School and Briar Woods High School. These sessions are held in the evenings and on a Saturday to accommodate working parents'/guardians' schedules. In the Winter of each school year, the Academies also holds a similar number of information nights for AdvAET and MATA programs at strategic locations throughout the Division so that parents/guardians have equitable access to these sessions and at times to accommodate working parents'/guardians' schedules. The Division makes translators available at the information sessions for parents/guardians who are not fluent in English so that the parents/guardian can support their children in considering whether to apply for one of the Academies programs.

The Academies also posts information about all four programs, including the admissions process, on its website so that the information is accessible for all potential applicants and their parents/guardian. The website is translated into Spanish and other major languages spoken by LCPS students. The information on the website includes the mission of the Academies, descriptions of the programs, a schedule of when and where information sessions are to be held, criteria for admission to each program, a video explaining all four programs and frequently asked questions.

At the Division level, the Admission Team meets with the LCPS English Learner supervisor to identify and discuss strategies for encouraging English Learner students to apply to the Academies. In addition, the Academies team meets with the LCPS Welcome Center team to provide information on the programs, the admission process and timelines so that the Welcome Center staff can assist in recruiting English Learner students to apply to the programs offered at the Academies. Admissions information is available in the Welcome Center in multiple languages.

To assist in increasing the applicant pool of underrepresented students for the Academies, including African American, Hispanic, English Learner and low income students, the Division has implemented Level Up at the middle school level. Level Up is a STEM enrichment program for middle school students who have been identified as having strong academic skills, are low income, and/or are underrepresented in the STEM fields. Level Up students meet during a resource period every other day and once a week after school to participate in STEM extension activities that build computational thinking skills, problem solving skills, collaborative skills, and creative thinking skills. The Division is currently implementing Level Up at four middle schools – Seneca Ridge Middle School, Sterling Middle School, Smart's Mill Middle School and River Bend Middle Schools.

At the elementary level, the Division has implemented a program called Propel to assist in encouraging underrepresented students, including African American and Hispanic students, to apply for the Academies programs. Propel students are invited to the Academies for their Vex

Robotics competition. Some of the intended outcomes are to give the students a “first look” at the Academies programs, to provide them an experience at the school, and to begin to build a community of learners who see themselves as members of the STEM community at Academies and the Academies as a place that they see themselves as belonging. Propel is offered at nine elementary schools – Sugarland Elementary School, Meadowland Elementary School, Forest Grove Elementary School, Guilford Elementary School, Sterling Elementary School, Sully Elementary School, Lucketts Elementary School, Frederick Douglass Elementary School and Rolling Ridge Elementary School.

The Admission Team has reached out to representatives of community and professional organizations to assist in encouraging underrepresented students, including African American, Hispanic, English Learner and low income students, to apply to the Academies and to develop partnerships with these organizations to assist with the pipeline of underrepresented students. These organizations include: the National Society of Black Engineers; Females of Color Underrepresented in STEM; Girls Inspired and Ready to Lead; the Diversity Council; Society of Hispanic Professional Engineers; Johns Hopkins Center for Talented Youth; and Excellent Options.

At the school level, the Admission Team implements a number of outreach and recruitment activities in the middle and high schools in LCPS. These include, for example:

- meeting with all of the counselors at the middle schools in August of each school year to explain the AET and AOS programs so that the counselors can assist with outreach and recruitment for the AET and AOS programs. Similarly, the Academies Team meets with all of the counselors at the high schools in the Fall of each school year so that they can assist with outreach and recruitment for the AdvAET and MATA programs;
- identifying middle schools that in the previous year with a low number of applicants and with higher numbers of African American and Hispanic students enrolled, as compared to other middle schools in the Division, for site visits to recruit students from those schools and following up with site visits to these schools. For example, in September 2019, the Academies team identified six middle schools that met this criteria – Sterling Middle School, Seneca Ridge Middle School, Farmwell Station Middle School, Smart’s Mill Middle School and J.L. Simpson Middle School – and conducted site visits to these schools to recruit students;
- reaching out to all eighth grade African American and Hispanic students who had not applied for the AET or AOS program and who were enrolled in Algebra I or Geometry by mid-October of the application period to encourage these students to apply to AET or AOS; and
- hosting field trips to the Academies for elementary and middle schools to provide information about the Academies programs and to encourage students to apply.

Admission Criteria and Process. LCPS – like other districts implementing STEM high school magnet programs – has struggled with developing admission criteria that identify students who,

based on the experience, professional judgment and research of LCPS staff, can be successful in the advanced STEM coursework offered in the AOS, AET and AdvAET programs. Based on research, experience and a review of data, LCPS has developed, reviewed and revised the criteria it uses for admission the Academies programs to ensure that all students, including African American, Hispanic, English Learners and low income students, have equitable access to these programs.

Each of the four programs at the Academies has a different focus and emphasis and requires students to have different prerequisites and skills in order to be successful. As a result, each program has different admission criteria. The admission criteria for each program are explained below.

Admission Criteria and Process for AET Program. There are two phases to the admissions process for the AET program and each phase of the process uses multiple measures to ensure that no one measure denies students access to the program. In Phase I of the application process, all applicants for the AET program must be enrolled in Geometry or above at the time of application and must take two tests – the California Critical Thinking Disposition Inventory (“CCTDI”) and the STEM Thinking Skills Assessment – on one of the dates when it is offered by LCPS. The Division offers transportation to students who need transportation to the testing site so that no student is disadvantaged by not being able to get to the testing site.

- Enrollment in Geometry is important because it is a prerequisite to Algebra II/Trigonometry that is part of the ninth grade curriculum of the AET.
- The CCTDI is designed to measure whether students have the disposition to learn and to apply critical thinking skills, which are important skills necessary for students to be successful in the AET program.
- The STEM Thinking Skills Assessment measures reasoning skills that are critical for success in engineering, technology, science, math and related subjects. According to the developer of the STEM Thinking Skills Assessment, the test was developed to be “culturally sensitive and inclusive.” LCPS used the STEM Thinking Skills Assessment for the first time this Fall. It replaced the SOL that had been used previously. LCPS replaced the SOL with the STEM Thinking Skills Assessment because, based on its research, LCPS determined that the STEM Thinking Skills Assessment is more “culturally sensitive and inclusive” in identifying students who could be successful in the AET program.

LCPS determines approximately 600 finalists for the 150 seats available in the AET program based on the scores on the CCTDI and the STEM Thinking Skills Assessment.

For the first step of Phase II of the admission process, students identified as finalists take the California Critical Thinking Skills Test with Numeracy (“CCTST-N”) and complete a writing assessment on one of the dates identified by LCPS for taking the CCTST-N and completing the writing assessment. The purpose of CCTST-N is to measure reasoning and numeracy skills of students.

The next step in Phase II of the admission process involves a review of multiple measures of data and information for each student by a racially and ethnically diverse panel of educators who are in different roles in LCPS. The data and information that the panel reviews for each student includes: the overall score of the CCTST-N; teacher recommendations of eighth grade math and science teachers; the results of the writing assessment; the final grades of C or better in each course in grades six and seven and grades of C or better in each course for first semester of eighth grade.

- The panel uses teacher recommendations as another source of data to determine students' thinking and problem solving skills, approaches to challenges, and passion for STEM. LCPS has reviewed and revised the teacher recommendation form to ensure that the form asks questions that relate to thinking and problem solving skills, approaches to challenges and passion for STEM.
- The panel uses the score on the writing sample to determine the student's interest in STEM courses and in the Academies. Each year, LCPS develops a new writing prompt. The writing prompt is developed by a group of educators who are familiar with the Academies programs. The group also develops a rubric for scoring the response to the writing prompt. At least two readers review each student's response to the writing prompt, and if there is a difference of more than two points in the scores given by readers to the prompt, a third reader reads the response to the prompt. Each of the readers is trained on the use of the rubric to score the writing prompts.
- Grades of C or better in all courses in sixth and seventh grade and grades C of better of first semester of eighth grade are important as another measure of whether the student may be successful in the rigorous courses in the AET.

Based on the review of data and information, the panel selects 150 students to whom offers are given and identifies 375 students who are placed on a waitlist. LCPS offers a seat to a student on the waitlist if a student who is given an offer declines the offer.

Admission Criteria and Process for AOS Program. There are two phases to the admission process for the AOS program and each phase of the process uses multiple measures to ensure that no one measure denies students access to the program. In Phase I of the application process, all applicants for the AOS program must be enrolled in Algebra I or above at the time of application and must take two tests – the California Critical Thinking Disposition Inventory (“CCTDI”) and the STEM Thinking Skills Assessment – on one of the dates when it is offered by LCPS. The Division offers transportation to students who need transportation to the testing site so that no student is disadvantaged by not being able to get to the testing site.

- Enrollment in Algebra I is important because it is a prerequisite to Algebra II/Trigonometry that is part of the ninth grade curriculum of the AOS.
- The CCTDI is designed to measure whether students have the disposition to learn and to apply critical thinking skills, which are important skills necessary for students to be successful in the AOS program.

- The STEM Thinking Skills Assessment measures reasoning skills that are critical for success in engineering, technology, science, math and related subjects. According to the developer of the STEM Thinking Skills Assessment, the test was developed to be “culturally sensitive and inclusive.” LCPS used the STEM Thinking Skills Assessment for the first time this Fall. It replaced the PSAT that had been used previously. LCPS replaced the PSAT with the STEM Thinking Skills Assessment because, based on its research, LCPS determined that the STEM Thinking Skills Assessment is more “culturally sensitive and inclusive” in identifying students who could be successful in the AOS program than the PSAT.

LCPS determines approximately 400 finalists for the 120 seats available in the AOS program based on the scores on the CCTDI and the STEM Thinking Skills Assessment.

For the first step of Phase II of the admission process, students identified as finalists take the California Critical Thinking Skills Test with Numeracy (“CCTST-N”) and complete a writing assessment on one of the dates identified by LCPS for taking the CCTST-N and completing the writing assessment. The purpose of CCTST-N is to measure reasoning and numeracy skills of students.

The next step in Phase II of the admission process involves a review of multiple measures of data and information for each student by a racially and ethnically diverse panel of educators who are in different roles in LCPS. The data and information that the panel reviews for each student includes: the overall score of the CCTST-N; teacher recommendations of eighth grade math and science teachers; the results of the writing assessment; the final grades of C or better in each course in grades six and 7 and grades of C or better students in each course for first semester of eighth grade.

- The panel uses teacher recommendations as another source of data to determine students’ thinking and problem solving skills, approaches to challenges and passion for research and science. LCPS has reviewed and revised the teacher recommendation form to ensure that the form asks questions that relate to thinking and problem solving skills, approaches to challenges and passion for research and science.
- The panel uses the score on the writing sample to determine the student’s interest in STEM courses and in the Academies. Each year, LCPS develops a new writing prompt. The writing prompt is developed by a group of educators who are familiar with the Academies programs. The group also develops a rubric for scoring the response to the writing prompt. At least two readers review each student’s response to the writing prompt, and if there are a difference of more than two points in the scores given by readers to the prompt, a third reader reads the response to the prompt. Each of the readers is trained on the use of the rubric to score the writing prompts.
- Grades of C or better in all courses in sixth and seventh grade and grades C of better of first semester of eighth grade are important as another measure of whether the student may be successful in the rigorous courses in the AOS.

Based on the review of all of the data and information, the panel selects 120 students to whom offers are given and identifies 125 students who are placed on a waitlist. LCPS offers a seat to a student on the waitlist if a student who is given an offer declines the offer.

AdvAET. Like the AOS and AET programs, the admission criteria for the AdvAET program includes multiple measures so that students are not excluded based on a sole data point. The criteria includes: currently enrolled in Math Analysis; successful completion of two science credits by the end of 10th grade with Research Earth Science, Research Biology or Research Chemistry recommended; final grade of C or above in each course in grade nine and final grade of C or above in each course for the first semester of grade 10; PSAT score (“NMSQT”) and a writing assessment score. Like with the AET and AOS programs, a racially and ethnically diverse panel of educators who are in different roles in LCPS reviews the information and data for the applicants.

Admission Criteria and Process for MATA Program. The admission criteria for MATA also include multiple measures. The criteria are: a resume that includes experiences or interests relevant to the pathway choices in the application; a career goal statement; Algebra I SOL score; PSAT score (“NMSQT”); academic record; verification of on-time graduation requirements and counselor recommendation. As with the AET and AOS programs, the data and information is reviewed by a racially and ethnically diverse panel of educators who are in different roles in LCPS.

Admission Criteria and Process for MATA Practical Nursing Program. The criteria for admission to the MATA Practical Nursing program includes: a final grade of C or better in Chemistry; a final grade of C or better in Biology; a resume that includes all experiences or interests relevant to nursing or health care; a career goal statement; Algebra I SOL score; PSAT score (“NMSQT”); the Test of Essential Academic Skills (“TEAS”); review of academic record; verification of on-time graduation requirements; a counselor recommendation; three personal recommendations and a panel interview for the finalists. As with the AET and AOS programs, the data and information is reviewed by a racially and ethnically diverse panel of educators who are in different roles in LCPS.

Enrollment and Demographics Academies Programs. The total enrollment and the demographics in each of the Academies programs is a result of a number of factors. These include student interest in the program and whether students meet the criteria for the programs. In addition, there are a number of reasons why students might not want to attend the Academies. These factors may include: lack of interest in the programs offered; the desire of students to attend their assigned school; the desire of students to attend school with their peers in their home school; interest in academic co-curricular and extracurricular offerings at their assigned school and transportation time between the Academies and their assigned schools.

For the two admission cycles since the Academies opened (for the Fall of 2018 for admission for the 2018-19 school year and for Fall of 2019 for the admission for 2019-20 school year), LCPS has reviewed applicant pools, disaggregated by race, ethnicity and gender, for each of the programs and the applicants offered seats for each of the programs disaggregated by race, ethnicity and gender. For example,

- The Fall 2018 applications for the AET program was approximately 64% Asian, 3% African American, 4% Hispanic, 3% Multi-racial, 25% White and 1% Other. This compares to the racial/ethnic enrollment at the middle and high school level, which is approximately 22% Asian, 7% African American, 17% Hispanic, 5 % Multi-racial and 48% White. Thus, comparing the applicant pool to the Division middle and high school enrollment, Asian students in the AET applicant pool are overrepresented by approximately 42 percentage points; African American students are underrepresented by approximately 4 percentage points; Hispanic students are underrepresented by approximately 12 percentage points; Multi-racial students are underrepresented by approximately 3 percentage points and Whites are underrepresented by approximately 23 percentage points.
- For those students who applied in the Fall of 2018 and who were offered admission to the AET program, the overrepresentation of Asian students increased compared to their percentage in the Division middle and secondary enrollment and the underrepresentation increased for the other racial and ethnic groups.
- For the AOS program for the Fall 2018 applications, there was similar overrepresentation of Asian students in the applicant pool and those who were offered admission and similar underrepresentation for the other racial and ethnic groups in the applicant pool and those offered admission.
- For the AOS program for Fall of 2018 applications, there was similar overrepresentation of Asian students and underrepresentation of other racial and ethnic students, including African American and Hispanic students, in the applicant pool and those offered admission.
- For the Fall 2018 applications for the AET program, approximately 43% of the applicants were female and 57% were male. Of those students offered seats, approximately 44% were female and 56% were male.
- For the Fall 2018 applications for the AOS program, approximately 49% of the applicants were female and 51% were male. Of those students offered seats, approximately 45% were female and 55% were male.

In your October 3, 2019 letter, you asked “[h]ow LCPS addressed the apparent statistical disparities in the number of African-American students applying to Academies of Loudoun programs and securing admission into the programs during the 2018 admissions cycle.” Based on the review of the Fall 2018 data for the AET and AOS programs, the disparity or underrepresentation in the applicant pool and those offered admission in the Fall of 2018 of African-American students compared to African American students in the Division enrollment for the middle and high schools was three to four percentages points. The disparity or underrepresentation of Hispanic students in the pool and those offered admission was greater than that for African American students.

LCPS was concerned about these disparities and took the underrepresentation of African American and Hispanic students into account in reviewing and revising the outreach and recruitment activities it implemented for the admission cycle for the Fall of 2019 for the AET and AOS and in reviewing and revising the admission criteria process for the AET and AOS for the admission cycle for the Fall of 2019. These changes are described in the Outreach and Recruitment and the Admission Criteria and Process sections of this narrative.

II. Equity Report

In your October 3, 2019 letter, you asked LCPS to provide information regarding what LCPS “planned or implemented” for four “findings” in the initial Equity Report conducted by the Equity Collaborative. In addition, while it is not completely clear from your October 3, 2019 letter, we are interpreting your letter to request steps that LCPS has taken to address the 14 recommendations in the Equity Report, specifically the recommendations on page 13 based on the students focus groups, the recommendations on page 15 based on the parent and community stakeholder focus groups, and the recommendations on page 20 based on the educator focus groups and interviews.

Below we first address the process that LCPS has taken to address the 14 recommendations in the Equity Report from the student focus groups, the parent and community stakeholder focus groups and educator focus groups and interviews. Following explaining the process and steps that LCPS has taken to address the 14 recommendations in the Equity Report, we then discuss the LCPS response to the findings in your October 3rd letter.

Following receiving the draft Equity Report, the School Board, Superintendent and cabinet reviewed and discussed the Equity Report, including the “emerging themes,” the 14 recommendations and follow up to the “emerging themes” and recommendations. In addition, on June 5, 2019, the Superintendent sent a letter to the Ad Hoc Committee on Equity (“Ad Hoc Committee”) in which he transmitted the Equity Report to the Ad Hoc Committee and stated that the Equity Report “serves as a call for additional action.” In that letter, he noted that the authors of the Equity Report “observe[d] [that] staff members ‘indicate a low level of racial consciousness and racial literacy. People are unclear and fearful on how to participate in conversations about race, let alone racially charged incidents.’” The Superintendent stated that “[w]e must address this.”

In the letter to the Ad Hoc Committee, the Superintendent also stated that the Equity Report “[h]ighlighted racial insults/slurs to which our students are subjected.” The Superintendent emphasized in the letter that “[w]e must make it clear through the Loudoun County Public Schools that we reject this painful, racist language that encourages discrimination, hatred and violence. Addressing these needs and others identified in the report will allow us to better fulfill our mission of empowering ALL students to make meaningful conversation contributions to the world.”

The Superintendent and his cabinet followed up on the Superintendent’s “call to action” by reviewing in depth the “emerging themes” and the 14 recommendations in the Equity Report and developing a working document that includes the 14 recommendations, the primary and secondary leads for each recommendation and the steps to be taken to address the

recommendations. In addition to detailing the steps to address the recommendations and the persons responsible for carrying out the plan, the working document provides that the Superintendent and his cabinet are to monitor progress in addressing each of the recommendations. The Superintendent and cabinet review the progress on at least a monthly basis and those responsible for following up on the recommendations review the progress with their respective departments.

For example, the first recommendation in the Equity Report states that “[s]chool [a]dministrators establish proactive measures that intervene and mitigate the impact of the racial incidents experienced by students of color in order to build an inclusive culture that doesn’t tolerate harassment.” See Equity Report at page 13. Dr. Ashley Ellis, the Assistant Superintendent for Instruction and Dr. Asia Jones, the Assistant Superintendent for Pupil Services, are the leads for this recommendation. An excerpt from the working document for the first recommendation is below.

Sample excerpt from Cabinet Working Document regarding equity assessment recommendations:

Recommendation	Primary Lead(s)	Notes
<p>1. School Administrators establish proactive measures that intervene and mitigate the impact of racial incidents experienced by students of color in order to build an inclusive culture that doesn’t tolerate harassment. (p.13)</p>	<p>Asia Jones, Ashley Ellis</p>	<p>09/09/19 Update: Progress:</p> <ul style="list-style-type: none"> • Training has been provided to the 33 elementary schools who are implementing Social Emotional Learning. DPS Staff will provide professional learning regarding how to run an effective morning meeting/ advisory/student forum to support classroom climate and connection and address racial tolerance.
		<p>Next Steps:</p> <ul style="list-style-type: none"> • Identify plan to expand training to other schools (Budget SY20 implications)
		<p>10/21/19 Update: Progress:</p> <ul style="list-style-type: none"> • Reviewed Second Step curriculum to identify opportunities for equity elaborations with existing social-emotional learning (SEL) skill lessons (e.g., empathy).
		<ul style="list-style-type: none"> • Developed “Determining Next Steps for Tiered Support” based

Recommendation	Primary Lead(s)	Notes
		<p>on universal screening data to promote equitable intervention opportunities for all learners and developed an “Instructional Match Matrix” to assign equitable and effective interventions.</p>
		<ul style="list-style-type: none"> Offered the Equitable Classroom Practices Observation Tool to promote culturally responsive teaching practices.
		<p>Next Steps:</p> <ul style="list-style-type: none"> Planning to develop equity lesson extensions in collaboration with DOI Equity Specialist.
		<ul style="list-style-type: none"> Ongoing SEL lead meetings will occur on a quarterly basis; the SEL Lead meeting on January 22, 2020 will involve equity as a focus.
		<ul style="list-style-type: none"> Offer ongoing division-wide Classroom System professional learning series in the fall and spring that includes trauma-informed and equitable practices (implicit bias, vulnerable decision points, neutralizing routines) in classroom behavioral management (specific training has also been provided at the new teacher seminar series, special education academy, as well as school-specific professional learning)
		<ul style="list-style-type: none"> Identify ongoing opportunities to lead administrators (principals/assistant principals) through restorative circles as proactive approach and restorative conferences as one response to racial incidents for victim, perpetrator, and bystanders.

Recommendation	Primary Lead(s)	Notes
		<p>10/24/19 Update: Progress:</p> <ul style="list-style-type: none"> Restorative practice (RP) training team is working individually with schools to develop effective morning meetings (language and circles) through the use of Tier 1 RP strategies.
		<p>Next Steps:</p> <ul style="list-style-type: none"> Identify how we prepare our RP trainers to be utilized by school based staff to address LCPS resources to support schools.
		<p>11/25/19 Update: Progress:</p> <ul style="list-style-type: none"> Office of School Administration facilitated activity and conversation with all principals at October 9, 2019 principal meeting, to include scenarios and table discussions regarding intervening and mitigating the impact of racial incidents in school.
		<p>Next Steps:</p> <ul style="list-style-type: none"> Provide principals with continued opportunities for conversations and group reflection regarding intervening and mitigating impact of racial incidents in schools.

Another example of a key step to assist in addressing the recommendations of the Equity report was the School Board’s approval of a new position – the Director of Equity. The role of the Director of Equity is to support the equity work of LCPS, including implementing the recommendations of the Equity Report and ensuring that diversity, inclusion and equity are a priority for LCPS. In addition, the Director of Equity is responsible for working with school and community groups ‘to create a stronger and more impactful equity imprint for LCPS’ and for supporting the work of the Ad Hoc Committee on Equity.

In addition to providing you information about the response of LCPS to the Equity Report, your letter requested that LCPS respond to four “findings.” The first “finding” from the Equity Report that you requested LCPS respond to was one of the “emergent themes” from the student focus groups conducted by the Equity Collaborative. That “emergent theme” states that

“[discipline policies and practices disproportionately negatively impact students of color, particularly African-American students.” See Equity Report at page 8.

Since Equity Report was issued, the LCPS has taken a number of steps to address the “emergent theme” to address what was reported in the student focus groups as “discipline policies and practices disproportionately negatively impact students of color, particularly African-American students.” The LCPS has taken these steps because it was very concerned that students of color, particularly African American students, reported in the students focus groups that they were negatively impacted by LCPS discipline policies and practices and wanted to remedy any negative impact of its discipline policies practices on students of color, particularly African American students.

The steps that LCPS has taken include the Department of Pupil Services (“DPS”) working collaboratively with the Department of Instruction (“DPI”) and school-based administrators — principals, assistant principals and deans — on a number of intervention and prevention strategies to address any discipline policies and practices that may negatively impact students of color, particularly African American students. These steps have included workshops, meetings and follow up sessions with school-based administrators. For example, LCPS:

- held a forum with principals in which it presented and guided a discussion on a newly-revised guidance document it developed entitled “Reflective Considerations Prior to Disciplinary Action.” The newly-revised guidance focused on three essential questions to provide an increased equity lens when administrators are considering disciplining a student. These are:
 - Have I previously suspended students for this violation?
 - What is the range of consequences I have assigned for this violation?
 - What are the consequences that I have given to white students with this violation? Non-disabled students?;
- provided additional professional development to school-based administrators on Positive Behavior interventions and Supports (“PBIS”), which is a framework to support a common vision, language and practices used in all LCPS schools to improve school climate, strengthen relationships, teach and reinforce expectations, increase positive behaviors, academic achievement and equitable learning experiences and decrease office referrals and suspensions;
- provided access for school-based teams to their discipline data so that the teams can identify patterns and areas of concern and then determine the resources and strategies needed to address any patterns and areas of concern in their discipline data;
- conducted professional development for central office and school-based administrators and teachers on “Implicit Bias, Privilege, Microaggression and Strategies to Increase Equitable Practices; and

- provided training for teachers and school-based administrators on classroom management practices and systems designed to provide a foundation for effective and equitable classroom practices. These practices include: arranging an orderly physical environment; defining, teaching, and acknowledging rules and expectations, defining and teaching classroom routines; employing active supervision; providing specific praise for behavior; implementing a continuum of response strategies for inappropriate behavior; providing for class-wide group contingency and providing for multiple opportunities to respond.

The second “finding” from the Equity Report that you requested that LCPS respond to was a statement on page 9 of the Equity Report that stated “[f]ocus group students explored the frustrations in their everyday experiences being targets of racists comments and acts of violence from peers and teachers.” Like with the “emergent theme” regarding disciplinary practices, LCPS was concerned to hear that students in the focus groups reported frustrations and experiences regarding being targets of racists comments and acts of violence. As a result, LCPS has taken steps to address the students’ frustrations and experiences.

Examples of the steps to address the students’ frustrations and experiences regarding being targets of racists comments and acts of violence include:

- LCPS is exploring how it might use Restorative Practices to address the concerns identified by students in their focus groups. Restorative Practices are defined as an emerging social science that studies how to strengthen relationships between individuals as well as social connections within communities. Restorative Practices engage groups in meaningful restorative circle conversations about race, enabling safe sharing of authentic perspectives and community building. Careful facilitation of restorative circles is one approach to build understanding of personal experiences different from our own to increase levels of racial consciousness;
- LCPS is providing experiences regarding restorative practices for administrators in LCPS so that they can understand what these practices are and how they might be used in LCPS. For example, on November 1, 2019, 65 DPS central office administrators participated in a 45-minute restorative circle activity based on race, and on November 18, 2019, the Superintendent’s cabinet also participated in a restorative circle focused on race. In December of 2019, all of the principals in LCPS will participate in a 45-minute restorative circle based on race. Based on the experiences of the central office and school-based administrators and the experience and the expertise of DPS trained facilitators, the LCPS will develop a plan to use restorative circles restorative practices in its schools with students and staff; and
- the DPS leadership team, including the assistant Superintendent for DPS, the director of student services, the director of diagnostic and prevention services, and supervisors of student services, school counseling, MTSS, meet on a monthly basis to discuss equity matters and to participate in activities to enhance team leadership of race conscious activities.

The third “finding” from the Equity Report that you asked LCPS to respond was to one of the “emergent themes” from the educator focus groups and interviews. That “emergent theme” states the “[s]chool staff, specifically principals and teachers, indicate a low level of racial consciousness and literacy. People are unclear and fearful on how to participate in conversations about race, let alone respond to racially charged incidents.” See Equity Report at 16. The LCPS was disturbed to hear this “emergent theme” from the educator focus groups and interviews, and as a result, developed a number of strategies to address this theme.

One of the key strategies to address this “emergent theme” of racial consciousness and literacy is the Equity in the Center professional learning, which is currently being implemented in LCPS. As explained in our November 26, 2019 letter, the Equity in the Center training is mandatory and includes “a multisession journey of learning for school staff aimed at addressing issues of race, bias, and cultural insensitivity.” In the first session, “participants explore their personal Why related to equity work and the data that informs that this work needs to be intentional.” In the second session, “participants . . . explore how their own individual experiences determine the lens through which they see Equity.” In the third session, “participants . . . explore ways that they have created a safe and inclusive space for ALL students to thrive and succeed.”

As discussed in our November 26, 2019 letter, the Equity in the Center training began in February 26, 2019 and will continue beyond the 2019-2020 school year. To date, the training has included a broad range of employees in the Division, including the Department of Instruction, high school principals and assistant principals, middle school principals and assistance principals, elementary principals and elementary assistant principals, the Administrative Leadership Team, and the Ad Hoc Committee on Equity. The Division plans training for additional staff during the remainder of this school year so that all school teams will have received initial training by March 2020.

In addition, as explained above in response to your requests regarding your first and second “findings,” the LCPS has taken additional steps to address and improve racial consciousness and literacy regarding teachers and teachers. For example, as discussed above, the LCPS has held discussions and training regarding a newly-revised guidance entitled “Reflective Considerations Prior to Disciplinary Action.” It has provided professional development on Restorative Practices, on PBIS and on the use of data at the school level to determine patterns and practices regarding discipline schools and strategies to address disparities regarding discipline patterns and practices.

The fourth “finding” from the Equity Report that you requested in your October 3rd letter that LCPS provide a response to was another “emergent theme” from the educator focus groups and interviews. This emergent theme states the “[t]eachers of color see and experience the LCPS hiring process as biased.” See Equity Report at page 16. After learning of this “emergent theme,” the Human Resource Talent Development Department (“HRTD”) developed a number of activities in marketing and outreach and in hiring to address this concern and the steps that the LCPS implemented resulted in the percentage of racially and ethnically diverse new hires for the 2019-20 school year increasing compared to those hired for the 2018-19 school year.

Examples of the new HTRD marketing strategies included redesigning the LCPS website to attract candidates, particularly candidates with diverse backgrounds. In addition, the LCPS

enhanced its social media and technology strategies to create earlier and stronger connections with candidates, particularly candidates with diverse backgrounds.

With regard to outreach, the LCPS developed and implemented a number of outreach strategies. These included:

- attending additional job fairs, including attending at least eight job fairs at Historically Black Colleges and Universities;
- hosting webinars for colleges with teachers of diverse backgrounds and 30 individuals signed up;
- increasing and improving the LCPS Grow Your Own Initiative; and
- partnering with Virginia colleges for licensure routes and career switcher programs.

In addition, as explained in our November 26, 2019 letter, the HRTD Department began a multiyear plan to present and train LCPS personnel regarding implicit bias training and equity in hiring, starting in the 2017-18 school year and continuing to date. The four-part training includes:

- Part I – “Recognizing Unconscious Bias,” which was presented by Montage Diversity Consultants during the 2017-18 school year, included an introduction to unconscious bias training as well as introducing diversity and inclusion terms, microaggression and social identifiers. There were 522 employees who participated in this training and participants included principals, assistant principals, and non-school based staff with supervisory responsibilities;
- Part II – “Recruiting/HR Best Practices for Hiring Managers,” which was also presented by Montage Diversity Consultants, took place during the 2018-19. included building on the unconscious bias training and how it relates to hiring as well as best practices, review of terms presented in Part I (i.e. using panels, diversifying interview panels, resume review tips and hiring with equity). Part II training included 243 participants and was comprised of principals, assistant principals, and central office director-level employees;
- Part III – “Unconscious Bias: Equity in Hiring,” which was presented by IBIS Consulting Group during the 2018-29 school year. This training included 277 teachers who sit on interview panels in the schools and covered unconscious bias, the different types of biases. The training used scenarios in a live theater format to demonstrate how bias can come out in interviews. It also included resume review tips and discussion regarding Mitigating Unconscious Bias with Equity in Hiring; and
- Part IV – Train-the-Trainer Module of “Unconscious Bias: Equity in Hiring,” which also was presented by IBIS Consulting Group (“IBIS”). This training is

taking place in the 2019-20 school year and was for administrators in the schools so that principals can train their staff as they invite more teachers to sit on panels or as they hire new staff. The training includes Mitigating Unconscious Bias with Equity in Hiring and utilizes a training-the-trainer model.

HRTD is working with IBIS to develop further training in the interview process, specifically around behavioral based interviewing, to address implicit bias and equity in hiring. In addition, the HRTD is developing new teacher job descriptions that include competencies for the development of interview questions. The goal is to continue to streamline the interview process with a continuous focus on ensuring equity in hiring. The initial phase of this training, "Hiring with Equity: Behavioral Based Interviewing," is scheduled to be delivered to principals and assistant principals in December 2019 and January 2020. HRTD is also reviewing a possible expansion to unconscious bias training to extend to strategies to develop and promote cultural awareness and inclusive and respectful workplaces.

III. Summary of Responses in November 26, 2019 Letter

In your October 3rd letter, you also asked that we provide information regarding a "comprehensive equity plan." In a subsequent telephone call, you asked that LCPS provide you a response to that request prior to our December 11 response. As you know, we provided you that response in our November 26, 2019 letter. As we stated in that letter, there is no comprehensive equity plan on the Division's website because the Superintendent and his leadership team is in the process of developing this plan. The will include action steps included in the working document discussed in Section II and additional strategies developed based on implementation of the action steps in the working document and based on research related to the recommendations in the Equity Report. The Superintendent and his leadership team also will seek input from key groups in the Division, including the MSAAC and the Ad Hoc Committee on Equity. The Division expects that the plan will be completed by April 1, 2020.

In addition in your October 3rd letter, you requested an update on the status of the Minority Student Achievement Advisory Committee's ("MSAAC") February 26, 2019 on the recommendation that the LCPS School Board "mandate implicit bias training for all LCPS employees." In a subsequent phone call, you requested that we respond to that request and other recommendations that MSAAC had made on February 26, 2019. We provided you a response to your request to your October 3rd letter and your subsequent request regarding the MSAAC's February 26, 2019 recommendations in our November 26, 2019 letter. As we explained in that letter, the LCPS has implemented the recommendations in MSAAC's February 26, 2019 letter.

In summary, this letter responds to the remaining requests in your October 3rd letter and summarizes the responses that LCPS previously provided in its November 4, 2019 and on November 26, 2019 letters. As our responses to your October 3, 2019 letter demonstrate, there is no support for allegations "that African-American students enrolled in [LCPS] have been denied an equal opportunity to participate in LCPS' Academies of Loudoun program." LCPS is committed to ensuring all students, including African American students, have equitable opportunities to attend the Academies programs and to attend all programs in LCPS. In addition, LCPS is committed to implementing the recommendations in the Equity Report and to carrying

out the Superintendent's "call to action" in his June 5, 2019 letter to the Ad Hoc Committee on Equity.

Mona, after you have an opportunity to review this letter, I would invite you to call me regarding staff you would like to interview and any other documents in which you are interested.

Sincerely,

A handwritten signature in cursive script that reads "Steve".

Stephen L. DeVita, Esquire
Division Counsel

SLD/kmd

cc: Dr. Eric Williams, Superintendent
Dr. Ashley Ellis, Assistant Superintendent of Instruction
Dr. Nyah Hamlett, Chief of Staff