

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

<b>RUBY LEE CALHOUN, et al.</b>	*	<b>CIVIL ACTION NO. 80-1422-A</b>
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<b>v.</b>	*	<b>JUDGE DRELL</b>
	*	
<b>NATCHITOCHE PARISH SCHOOL BOARD</b>	*	<b>MAGISTRATE JUDGE KIRK</b>
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**MEMORANDUM OF AUTHORITIES IN SUPPORT OF  
MOTION OF NATCHITOCHE PARISH SCHOOL BOARD  
FOR AUTHORIZATION TO CONSOLIDATE SCHOOLS,  
CHANGE GRADE STRUCTURES THEREIN, AND MOVE  
NATCHITOCHE MAGNET SCHOOL INTO VACANT FACILITY**

This memorandum is submitted by defendant Natchitoches Parish School Board (hereinafter “School Board” or “Board”) in support of its motion seeking authority from the Court to modify its current student assignment plan. More specifically, that motion seeks permission from the Court to:

- (1) Close Parks Elementary School (PreK-6) and consolidate it with L.P. Vaughn Elementary School (PreK-6);
- (2) Reassign all 6<sup>th</sup> grade students from the consolidated L.P. Vaughn Elementary School to Natchitoches Junior High School/Frankie Ray Jackson (Grades 6-8); and
- (3) Move Natchitoches Magnet School (Grades 1-8) into the vacated Parks Elementary School facility.

In support of such motion, the Board would show as follows.

The Board has had an ongoing concern for several years about student performance at Parks Elementary School. Many efforts have been made by the District to improve its academic performance. Some of those efforts have included, but are not limited to, changes in administration

(including placing a “turnaround specialist” into the position of principal), the addition of two (2) literacy specialists to the faculty, the addition of a curriculum strategist to the faculty, and grants have been written to provide pedagogy coaches for teachers and a leadership coach for the principal. Despite these efforts, the school performance score of Parks Elementary School has fallen from 64.3 in 2011-12 to 32.6 in 2014-15 and the school has an “F” rating with an Academically Unacceptable Status 5 (denoting decline in score for the last 5 years).

As the District was analyzing data and planning changes at Parks Elementary for the upcoming school year, an unrelated issue arose concerning another school. After recent flooding, Natchitoches Magnet School was found to have dangerous mold in its already outdated building. It is estimated that it will cost at least \$4,000,000 to remove the mold and to properly renovate the existing facility and the Board does not have the funding necessary to make such renovations despite the fact that they are urgently needed for the safety of students and faculty members.

The combination of the academic problems at Parks Elementary and the facility problems at Natchitoches Magnet gave the Board the opportunity to come up with a solution that would simultaneously address both situations. Input was sought from multiple stakeholders, including Central Office staff, Board members, principals, teachers, parents, and community members. The alternatives were discussed at Board meetings on April 12, 2016, April 14, 2016, and April 20, 2016. On April 20, 2016, the Board unanimously supported the following plan.

Parks Elementary School (PreK-6) would be closed, and its students would be reassigned to adjacent L.P. Vaughn Elementary School. The advantages for this closure and reassignment would include:

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- (1) Moving students from an “F” rated school to a school with a higher rating;
  - (2) Being able to house all Pre-K to K students at L.P. Vaughn in one wing of the school with restrooms in the classrooms;
  - (3) Being able to take advantage of Early Childhood grants awarded to the Board on behalf of L.P. Vaughn that stipulate that students have easy access to developmentally appropriate playground equipment, transition procedure/activities from Pre-K to K, and low open shelves/bins within easy reach of children;
  - (4) Promoting continuity and instructional practices from grade to grade through consolidation and allowing the opportunity for teachers to work together by grade level and content;
  - (5) Allowing professional development after consolidation to be provided to all teachers of specific grades in one location on one day, rather than multiple locations on multiple days;
  - (6) Providing more opportunity for strong teachers to serve as mentors to new or struggling teachers.

In order to accommodate all of the students from Parks Elementary and L.P. Vaughn Elementary on the same campus at L.P. Vaughn Elementary, it is also proposed that the 6<sup>th</sup> grade students at that school be reassigned to Natchitoches Junior High/Frankie Ray Jackson. Currently, those students would begin attending NJH/FRJ beginning with the 7<sup>th</sup> grade. Moving the 6<sup>th</sup> graders from the consolidated L.P. Vaughn Elementary to NJH/FRJ gives those students the opportunity to benefit from a middle school instructional model that will ease the transition to junior high and high school for those students, as well as to allow students to participate in electives offered at the school

that are not currently available to them on an elementary school campus.

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The facility at Parks Elementary School is still in good condition. With its closure as an elementary school, that facility could be used to house the Natchitoches Magnet School. Since its inception, that school has been educationally successful and racially balanced. Unfortunately, its current facilities have been further damaged by recent flooding and are both inadequate and unsafe. Through roof leaks, flooding, and other problems, the current magnet school facility has developed mold that is potentially harmful to students and faculty members alike. It is estimated that repairs needed at the magnet school would exceed \$4,000,000, and the Board does not have that money available to make such repairs.

For all of these reasons, the Board proposes to move Natchitoches Magnet School from its current location to the vacated Parks Elementary School facility. The Parks facility is large enough to accommodate the magnet school, and the movement of that school to that facility would eliminate the need for the expensive repairs to be done at the current magnet school location. This move could also be made in time for the 2016-17 school year, whereas substantial renovations and/or new construction would take much longer than that to complete.

Finally, it should be noted that approval of this motion will not negatively effect desegregation of any of the schools involved. Consolidation of the students from Parks Elementary with the students at L.P. Vaughn Elementary does not significantly change the percentages of white and black students at the latter, nor does the movement of the 6<sup>th</sup> grade students from L.P. Vaughn Elementary to Natchitoches Junior High/Frankie Ray Jackson do so. Similarly, movement of the magnet school program *in toto* from its current location to the Parks Elementary facility will have no effect on the student demographics of the magnet school.