

BEFORE THE
STATE ADMINISTRATOR
INGLEWOOD UNIFIED SCHOOL DISTRICT

In the Matter of the Reduction
in Force of:

OAH No. 2018030692

CERTIFICATED EMPLOYEES OF THE
INGLEWOOD UNIFIED SCHOOL
DISTRICT,

Respondents.

PROPOSED DECISION

This matter was heard by Carla L. Garrett, Administrative Law Judge, Office of Administrative Hearings, State of California, on April 13, 2018, in Inglewood, California.

Sharon J. Ormond, Attorney at Law, of Atkinson, Andelson, Loya, Ruud & Romo, represented Nora Roque, Executive Director of Human Resources of the Inglewood Unified School District (District).

Respondents are comprised of the 64 individuals set forth in Appendix 1 who were served with a District Statement of Reduction in Force stating that the District has decided to reduce or discontinue certain educational services and did not intend to reemploy them for the 2018-2019 school year. A number of certificated employees requested a hearing for a determination of whether cause exists for not reemploying them for the 2018-2019 school year. All certificated employees that requested a hearing, and whose notices had not been rescinded by the time of the hearing on April 13, 2018, were represented by Carlos R. Perez, Attorney at Law, of the Law Office of Carlos R. Perez, as Certain Respondents, and consisted of 36 individuals, as identified in Appendix 2. No appearance was made by or on behalf of any other respondent.

Oral and documentary evidence was received, the record was closed, and the matter was submitted for decision on April 13, 2018.

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FACTUAL FINDINGS

Parties and Jurisdiction

1. Certain Respondents are certificated employees of the District.
2. On March 7, 2018, the State Administrator of the District resolved to reduce and eliminate particular kinds of services totaling 67.5 full-time equivalent (FTE) positions at the end of the 2017-2018 school year, and directed District staff to proceed to layoff certificated staff pursuant to Education Code sections 44949 and 44955 and 8366.¹
3. Before March 15, 2018, District staff gave written notice to 64 certificated District employees, including Certain Respondents, advising that the State Administrator had received a recommendation that notice be given to numerous certificated District employees that their services will not be required for the 2018-2019 school year. Certain Respondents comprise the 36 individuals who timely requested a hearing to determine if there is cause for not employing them for the next school year.²
4. Nora Roque, in her official capacity as the Executive Director of Human Resources of the District, filed a District Statement of Reduction in Force regarding a reduction in force concerning 64 respondents, alleging cause exists to not reemploy each respondent for the following school year. The respondents were provided all required documents in a timely manner.

The Layoff Resolution

5. On March 8, 2018, the State Administrator adopted Resolution No. 23/2017-2018 (Resolution), which provided for the reduction or elimination of the following particular kinds of services:

<u>Services</u>	<u>FTE Positions</u>
Elementary School Teaching Services	30.00
Middle School 7-8 English Teaching Services	1.00
Middle School 7-8 Math Teaching Services	1.00
Middle School 7-8 Social Science Teaching Services	1.00
Middle School 7-8 Science Teaching Services	1.00
High School 9-12 English Teaching Services	3.00
High School 9-12 Math Teaching Services	3.20

¹ All further statutory references are to the Education Code unless otherwise noted.

² On April 13, 2018, at the commencement of the hearing, the District, pursuant to a stipulation, rescinded the layoff notice served on Dr. Mary Spruce, effectively reducing the number of Certain Respondents from 37 to 36.

<u>Services</u>	(Continued)	<u>FTE Positions</u>
High School 9-12 Intro to Digital Teaching Services		1.00
High School 9-12 Social Science Teaching Services		2.80
High School 9-12 Biology Teaching Services		2.00
High School 9-12 Business Teaching Services		1.00
Intervention Teaching Services		8.00
TOSA/Career Technical Education/Adult School		1.00
Elementary Assistant Principal		3.00
Elementary Principal		1.00
Middle School Principal		1.00
Continuation High School Assistant Principal		1.00
Director of Research, Assessment and Evaluation		1.00
Director of Human Resources		1.00
Special Education Assistant Principal		2.00
AM Preschool Teaching Services		1.50
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Total Full-Time Equivalent Reductions		67.50 FTE positions

Grounds for Layoffs

6. Ms. Roque, who testified at hearing, explained that the Resolution was required as a result of the District's current financial difficulties. Specifically, the District has faced significant financial difficulties for a number of years, which resulted in the District obtaining a \$28,000,000 loan from the State of California in the Fall of 2012. The District is now under the authority of a State Administrator. The State Administrator has assumed all legal rights, duties, and powers of the District's Board of Education.

7. Ms. Roque explained that as a result of having to balance the budget, which included the loan repayment of \$8,000,000 to \$9,000,000 per year³ to the State of California, as well as the economic conditions caused by declining enrollment, the State Administrator resolved to reduce or discontinue particular kinds of service, pursuant to Code section 44955, for the 2018-2019 school year in both the K-12 and preschool programs.

8. The decision by the State Administrator to reduce or discontinue services was neither arbitrary nor capricious, but rather was a proper exercise of the District's discretion given the budgetary constraints and other factors considered by the State Administrator, and the manner in which the decision to reduce or discontinue services was reached. No evidence was presented demonstrating that services will be reduced below mandated levels.

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³ The District submitted a prehearing brief, marked and lodged as Exhibit 11, which stated that the District pays \$2,000,000 per year in loan payments to the State of California.

*The Seniority List*⁴

9. Ms. Roque testified that the District has implemented the Resolution in a manner to ensure that no permanent or probationary teacher with less seniority than any respondent would be retained to render a service that any respondent was certificated and competent to render. The District maintains a Seniority List which contains employees' seniority dates, current assignments and locations, credentials, and authorizations. The Seniority List was based on information from the District's human resources records and credentialing records of the California Commission on Teacher Credentialing. The evidence established that the Seniority List utilized in the layoff process is accurate as to the information contained therein, with the exception of the modifications described in Footnote 4.

10. The District used the Seniority List to develop a proposed layoff list of the least senior employees currently assigned in the various services being reduced or eliminated. The District then determined whether those least senior employees held credentials in another area and were entitled to bump other employees with less seniority. In determining who would be laid off for each kind of service reduced, the District counted the number of reductions not covered by known vacancies and determined the impact on incumbent staff in inverse order of seniority.

11. The Resolution determined that as between employees who first rendered paid service on the same date, the order of termination would be based on the needs of the District and the students. Based upon the needs of the District and the students, the District developed tie-breaker criteria as follows: (1) persons with Master's Degrees prioritized in the order of Math, Science, or English; (2) persons with Bachelor's Degrees prioritized in the order of Math, Science, or English; (3) persons who hold a BCLAD⁵ or other comparable English Learner (EL) Authorization; (4) persons who hold a CLAD⁶ or other comparable English Learner (EL) Authorization; (5) persons with Clear (or Life) Credentials and authorizations allowing service prioritized in the order of Special Education, Math, English, or Science; (6) persons with Subject Matter Authorization prioritized in the order of Special Education, Math, English, Science, or persons with Clear Credentials; (7) persons with Preliminary Credentials and authorizations prioritized in the order of Special Education, Math, English, or Science; (8) persons with Intern Credentials and authorizations prioritized in the order of Special Education,

⁴ The Seniority List as of March 1, 2018, submitted by the District as Exhibit 8, set forth all 2017-2018 certificated employees. On April 13, 2018, at the commencement of the hearing, the parties reached a stipulation that Dr. Mary Spruce's seniority position listed on the Seniority List would be changed from 404 to 384A, and Robbie Tate's seniority position would be changed from 418 to 409A.

⁵ The Bilingual, Cross-Cultural, Language and Academic Development (BCLAD) certificate or credential.

⁶ Cross-Cultural Language and Academic Development (CLAD) Certificate.

Math, English, or Science; (9) persons with Supplemental Credentials prioritized in the order of Special Education, Math, English, or Science; (10) persons with Master's Degrees; (11) persons with Preliminary Credentials; (12) persons with Intern Credentials; (13) persons with multiple teaching credentials; (14) persons with National Board Certification; (15) total credentialed teaching experience inside and outside of the District; (16) units beyond Bachelor's Degree; (17) persons who have completed AB466/SB472 training in Math; (18) persons who have completed AB466/SB472 training in English; (19) persons with a reading certificate; and (20) lottery (if the above criteria do not break a tie).

12. The tie-breaking criteria were used in this matter to resolve ties in seniority amongst certificated personnel. The validity of the tie-breaking process is not in dispute.

Bumping

13. Ms. Roque testified that the District analyzed whether each impacted employee, beginning with the most senior, could be reassigned to a vacancy created by other employees leaving the District for reasons other than layoff (i.e., attrition)⁷ or whether the employee could be reassigned or bump a more junior employee from his or her position.

14. The Resolution provided that "bumping shall only be allowed in cases where the senior employee is both competent and credentialed to assume the whole assignment of the more junior employee." (Exhibit 1, page 3, paragraph G.) The Resolution established competency criteria, pursuant to in Code section 44955, subdivision (b), for the purposes of bumping, and included the following: (1) possession of a valid or preliminary credential in the subject(s) or grade level to which the employee will be assigned at the beginning of the 2018-2019 school year; (2) appropriate full (non-emergency) EL authorization if required by the position; (3) in the case of displacing junior employees teaching in a departmentalized setting, single subject credential(s) or subject matter authorization in that subject area; and (4) any training and experience necessary to meet the job requirements of specialized positions.

15. The validity of the competency criteria is not in dispute.

Skippping

16. The Resolution provided that the District, pursuant to Education Code section 44955, would deviate from terminating certificated employees in the order of seniority where the District demonstrates a specific need for personnel to teach a specific course or course of study. At hearing, Ms. Roque explained that due to the District's specific need to hire and retain teachers who possess special training and experience to teach classes in the Dual Immersion program, the Resolution provided that the District could deviate from terminating

⁷ Ms. Roque testified that the District, in an effort to reduce the number of teachers facing layoff, offered early retirement packages to those that qualified. Ms. Roque explained that should the District secure 30 positive responses, the District will rescind some of the layoff notices.

certificated employees in the order of seniority in instances where the less senior employee possessed special training and experience to teach classes in the Dual Immersion program and would be assigned to do so in the 2018-2019 school year.

17. Ms. Roque testified that the Dual Immersion program is one in which teachers provide instruction in two languages for all subjects areas. Currently, two District schools provide instruction in both English and Spanish, and one school provides instruction in both English and French. Right now, the program exists in only a few grade levels, but the District plans to expand the program to other grades. While the Resolution mentioned nothing about the special training and experience necessary to teach in the Dual Immersion program, Ms. Roque testified that in order to be a teacher in this program, the teacher must have a BCLAD and a multiple subject teaching credential.

18. The individual teachers of the Dual Immersion program, their respective hire dates, and their position on the Seniority List, are set forth as follows:

<u>Teacher</u>	<u>Hire Date</u>	<u>Seniority List Position</u>
Miriam C. Carrillo	01/06/2014	419
Maria Aguirre	09/02/2014	429
Pamela Cota	09/02/2014	430
Aneyda Rios	09/15/2014	442
Moises Rodriguez	08/16/2016	475
Genevieve Chevron	08/15/2017	501
Noelia Ventura	08/15/2017	505
Reyna Robles	08/15/2017	506

19. According to the Seniority List, as of March 1, 2018, Moises Rodriguez had left his employ with the District through attrition, and his position was filled by Heather Richardson, whose position on the Seniority List was 307. (Exhibit 8, page 14.) Heather Richardson, who was a first grade teacher at one of the District's elementary schools (i.e., Centinela Elementary School), possessed a BCLAD and a multiple subject teaching credential, and had been bumped from her position as a first grade teacher at Centinela Elementary School by a more senior employee, Jennifer Heath, whose position on the Seniority List was 44, and who served as an intervention teacher at the District's Kelso Elementary School. (Exhibit 8, pages 2 and 9.)

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Challenges to Skipping Teachers in Dual Immersion Program

A. Claudia Young

20. The Seniority List sets forth the hire date of Claudia Young of Certain Respondents (Respondent Young) as August 16, 2014, Seniority List Position 428, although Respondent Young first rendered service to the District on August 16, 2013. At hearing, Respondent Young explained that because she first rendered service as an administrator, and later returned to teach in the classroom, the District modified her seniority date by one year. Respondent Young, who currently serves as a teacher in a kindergarten-first grade combination class, does not dispute her seniority date. Respondent Young was identified for layoff as 1.0 of 30.0 FTE positions slated for reduction in elementary school teaching services. Respondent Young, who holds both a BCLAD and a multiple subject teaching credential, as well as an administrator's credential and a Master's degree, not only taught in the District's Dual Immersion program at one time, but was instrumental in creating the program for the District. Specifically, Respondent Young hired and trained staff for the program, including some of those listed in Factual Finding 18, and helped develop the curriculum.

21. Prior to joining the District, Respondent Young taught in the Dual Immersion program in the Chico Unified School District (CUSD). As she did at the District, Respondent Young helped to develop the Dual Immersion program at CUSD, and served as the program's site administrator as well as one of its teachers. With the exception of Respondent Young, no other individual who received a layoff notice possesses a BCLAD and a multiple subject teaching credential.

22. Given Respondent Young's training and experience with Dual Immersion programs, coupled with her BCLAD and multiple subject teaching credential, Respondent Young contends that she should have been permitted to bump one of the more junior Dual Immersion teachers that the District has slated to skip. Of the eight Dual Immersion teachers listed in Factual Findings 18 and 19, Respondent Young is more senior than six of them, the most junior of which was hired by the District fewer than nine months ago, on August 15, 2017. At hearing, Ms. Roque testified that the District did not apply any bumping criteria with respect to Respondent Young in relation to the teachers in the Dual Immersion program.

23. Permanent employees may not be terminated while an employee with less seniority is retained to render a service which the senior employees are "certificated and competent to render." (§ 44955, subd. (b).) A teacher is qualified to serve in a teaching position by possession of an appropriate credential plus completion of appropriate academic preparation or experience in the subject matter in which the vacant position occurs. (*Taylor v. Board of Trustees* (1984) 36 Cal.3d 500.)

24. A senior teacher whose position is discontinued has the right to transfer to a continuing position which he or she is certificated and competent to fill. In doing so, the

senior employee may displace or “bump” a junior employee in that position. (*Lacy v. Richmond Unified Sch. Dist.* (1975) 13 Cal.3d 469, 473–474.)

25. However, section 44955, subdivision (d)(1), permits a district to deviate from the order of seniority in teacher layoffs when “the district demonstrates a specific need for personnel to teach a specific course or course of study . . . and that the employee [who is retained] has special training and experience necessary to teach that course or course of study . . . which others with more seniority do not possess.” These are factual questions, and the district seeking to skip junior teachers bears the burden of proving each element. (*Bledsoe v. Biggs Unified School Dist.* (2008) 170 Cal.App.4th 127, 138, as modified on denial of reh. (Jan. 12, 2009).)

26. Here, the District failed to meet its burden of demonstrating that the junior teachers slated for skipping had the special training and experience necessary to teach in the Dual Immersion program that others with more seniority do not possess. Specifically, the evidence showed that Respondent Young, who is more senior than six of the eight Dual Immersion program teachers, not only possesses the BCLAD and a multiple subject teaching credential, which Ms. Roque testified were the requirements of a Dual Immersion program teacher, but she possesses sufficient expertise and experience in Dual Immersion teaching such that she developed curriculum, hired and trained staff, and oversaw the Dual Immersion program at both the District and at CUSD. Given these factors, and despite Ms. Roque’s testimony to the contrary, the District in this instance did not implement the Resolution in a manner to ensure that no permanent or probationary teacher with less seniority than any respondent would be retained to render a service that any respondent was certificated and competent to render. Indeed, in light of the above, Respondent Young should have been permitted to bump one of the more junior Dual Immersion teachers that the District has slated to skip, and should no longer be subject to layoff.

B. Cheryl Alexander

27. Cheryl Alexander of Certain Respondents (Respondent Alexander) maintains a seniority date of October 31, 2007, with a Seniority List position of 364, and holds a CLAD and a multiple subject teaching credential, among other things. Respondent Alexander, who does not dispute her seniority date, was identified for layoff as 1.0 of 30.0 FTE positions to be reduced in elementary school teaching services. Respondent Alexander, who testified at the hearing, expressed a concern she had with the skipping criteria, noting that while some junior teachers held BCLAD credentials, they were not tenured as she was. She additionally explained that while she had no BCLAD, she had taught a number of Spanish-speaking students over the years, and experienced no problem in teaching and communicating with them. Finally, Respondent Alexander expressed that the layoffs should be based solely on seniority, and not whether she actually possesses a BCLAD.

28. Despite Respondent Alexander’s misgivings about the skipping criteria, the fact remains that all Dual Immersion teachers are required to hold BCLAD credentials, among other things, as established by the testimony of Ms. Roque. As evidenced by the

Seniority List that identifies each certificated employee's credentials, all of the District's Dual Immersion teachers, without exception, hold BCLAD credentials. While working successfully with Spanish-speaking students over the years speaks highly of Respondent Alexander's capabilities as a teacher, it does not supplant the hard work, effort, and training necessary to earn a BCLAD credential, which is undoubtedly utilized in teaching students in the Dual Immersion program. In short, Respondent Alexander presented no evidence establishing that the District improperly skipped the more junior Dual Immersion program teachers over her, or otherwise failed to meet the skipping requirements, pursuant to Code section 44955, subdivision (d).

C. Robbie Tate

29. Robbie Tate of Certain Respondents (Respondent Tate) maintains a seniority date of February 21, 2013, with a Seniority List position of 409A,⁸ and holds a CLAD and a multiple subject teaching credential, among other things. Respondent Tate, who does not dispute her seniority date, was identified for layoff as 1.0 of 30.0 FTE positions to be reduced in elementary school teaching services. Respondent Tate, who testified at the hearing, expressed a problem with "the old fashioned criteria for laying off teachers." She explained that the District has failed to focus on why the District continues to lose students to charter schools, which she contends is due to the District laying off its most effective teachers. Consequently, Respondent Tate expressed that the District and the union needed to work on how to keep effective teachers in the classroom and hold the District accountable. Finally, Respondent Tate stated that she just learned at the hearing that having a BCLAD credential could have potentially saved her from layoff, and had she known that information before, she would have taken steps to obtain a BCLAD credential.

30. Despite Respondent Tate's issues concerning layoffs and the skipping criteria, she presented no evidence establishing that the District improperly skipped the more junior Dual Immersion program teachers over her, or otherwise failed to meet the skipping requirements, pursuant to Code section 44955, subdivision (d).

D. Beth Anne Baker Joel

31. Beth Anne Baker Joel of Certain Respondents (Respondent Joel) maintains a seniority date of August 31, 2005, with a Seniority List position of 321, and holds a CLAD and a multiple subject teaching credential, among other things. Respondent Joel, who does not dispute her seniority date, was identified for layoff as 1.0 of 30.0 FTE positions to be reduced in elementary school teaching services. Respondent Joel, who testified at the hearing, stated that teachers who teach in the Dual Immersion program have smaller class sizes compared to other District classes, leaving her questioning how the District justifies keeping those teachers while laying off others who have to manage and teach much larger classes.

⁸ See Footnote 4.

32. Despite Respondent Joel's perceived inequities regarding class size, this grievance does not constitute evidence establishing that the District improperly skipped the more junior Dual Immersion program teachers over her, or otherwise failed to meet the skipping requirements, pursuant to Code section 44955, subdivision (d).

Other Individual Challenges to Layoffs

A. Bonnie Williams / Alicia Martinez / Ramona Rocha

33. Bonnie Williams, Alicia Martinez, and Ramona Rocha of Certain Respondents (Respondents Williams, Martinez, and Rocha, respectively) each maintain a seniority date of August 4, 2007, as well as a Seniority List position of 8 on the 2017-2018 Child Development Center Seniority List. Respondents Williams, Martinez, and Rocha each hold child development teacher permits, and none of them dispute their seniority date. Respondents Williams, Martinez, and Rocha were identified for layoff as .5 each of 1.50 FTE positions to be reduced in morning preschool teaching services. Respondent Williams testified at hearing and spoke on behalf of Respondents Martinez and Rocha. Respondent Williams expressed what she believed was the inherent unfairness of she and her colleagues suffering layoffs, despite the dedication and hard work involved in serving the children of the Child Development Center, and being required to work in multiple capacities.

34. Despite Respondents Williams', Martinez', and Rocha's reservations about the layoff process, the District properly identified each of them as employees subject to layoff. They presented no evidence establishing that the District erred in its decision to initiate layoff proceedings against them or evidence demonstrating they should be exempted from the layoff process.

B. Remainder of Certain Respondents

35. The remainder of Certain Respondents presented no evidence demonstrating that the District erred in its decision to initiate layoff proceedings against them. They also presented no evidence demonstrating they should be exempted from the layoff process.

Conclusion

36. School districts have authority and discretion to "make assignments and reassignments in such a manner that employees shall be retained to render any service which their seniority and qualifications entitle them to render." (Ed. Code, § 44955, subd. (c).) With exception to Respondent Young as discussed in Factual Findings 20 through 26, all other arguments against the State Administrator's Resolution No. 23/2017-2018 are not convincing, and taking into account the change to Respondent Young's layoff status as described in Factual Finding 26, no junior certificated employee is otherwise scheduled to be retained to perform services that a more senior employee is certificated and competent to render. (Factual Findings 1 through 35.)

LEGAL CONCLUSIONS

1. The party asserting a claim or making charges in an administrative hearing generally has the burden of proof. (*Brown v. City of Los Angeles* (2002) 102 Cal.App.4th 155.) As no other law or statute requires otherwise, the standard of proof in this case requires proof by a preponderance of the evidence. (Evid. Code, § 115.) Therefore, the District bears the burden of establishing cause to affirm the proposed layoff decisions by a preponderance of the evidence.

2. All notice and jurisdictional requirements of Code sections 8366, 44949, and 44955 were met. (Factual Findings 1 through 4.)

3. The services identified in the Resolution are particular kinds of services that may be reduced or eliminated pursuant to sections 8366 and 44955. The State Administrator's decision to reduce or eliminate the identified services was neither arbitrary nor capricious and was a proper exercise of discretion. Services will not be reduced below mandated levels. Cause for the reduction or elimination of those particular services relates solely to the welfare of the District's schools and pupils within the meaning of Code section 44949. (Factual Findings 5 through 8.)

4. Cause exists to reduce the number of certificated employees of the District due to the reduction and elimination of particular kinds of services. (Factual Findings 5 through 8.)

5. Taking into account the above findings and conclusions, particularly those concerning Respondent Young, no junior certificated employee is scheduled to be retained to perform services that a more senior employee subject to layoff is certificated and competent to render. (Factual Findings 1 through 36.)

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ORDER

1. The District Statement of Reduction in Force is sustained against all respondents as set forth in Appendix 1, including Certain Respondents as set forth in Appendix 2, with the exception of Respondent Claudia Young. The District shall issue a final notice of layoff advising that their services will not be required for the 2018-2019 school year, and such notice shall be given in inverse order of seniority. These layoffs shall be deducted from the 67.50 FTE District is entitled to apply as reduction of particular kinds of services.

2. The District Statement of Reduction in Force is dismissed against Respondent Claudia Young, and the District shall not issue her a final layoff notice for the 2018-2019 school year.

Dated: May 4, 2018

DocuSigned by:

Carla L. Garrett

CARLA L. GARRETT

Administrative Law Judge

Office of Administrative Hearing

Appendix 1: Respondents Issued Layoff Notices

K12 Program:

1. Alaniz, Robert
2. Alexander, Cheryl
3. Amini, Ali
4. An, Hyunsoo
5. Anyiam, Robert
6. Autrey, Deborah
7. Avila, Nancy
8. Barahona, Miguel
9. Barbee, Jonathan
10. Bentley, Jimanese
11. Butler, Cordiya
12. Chambers, Samantha
13. Chavez, Marc
14. Chestnut, Shandra
15. Choi, Brandon
16. Contreras, Thomas
17. Deras, Ana
18. Ford, Rahmon
19. Fowler, Allen
20. Friedman, Sally
21. Ginsberg, Brent
22. Goldman, Benjamin
23. Green, Toyin
24. Harvey, Brian
25. Joel, Beth Anne Baker
26. Johnson, Lashawnda
27. Jones, Cayana
28. Jones, Nadia
29. Jones, Tracy Sheneil
30. Lang, John
31. Lu, Yi Ping
32. Lund, Allison
33. Manning, James
34. Marquez, Fabiola
35. Martin, Ariana
36. McDonald, Carolyn
37. Najera, Maria
38. Ndiforchu, John
39. O’Kain, Timothy
40. Orliczky, Thomas
41. Pogue, Melody
42. Ramos, Zenaida

Appendix 1: Respondents Issued Layoff Notices (Cont.)

43. Raschilla, Nicholas
44. Richardson, Heather
45. Rodriguez, Oscar
46. Rogers, Antoinette
47. Sandoval, Hilberto
48. Schmidt, Kristofor
49. Schubert, John
50. Simpson, Vincent
51. Spruce, Mary
52. Stanton, Shawn
53. Tate, Robbie
54. Tran, Hoa
55. Tyndall, Randolph
56. Valenzuela, Claudia
57. West, Nikki Marie
58. White, Sandra
59. Winslow, Chantelle
60. Young, Claudia

Preschool Program

1. Martinez, Alicia
2. Rocha, Ramona
3. Williams, Bonnie
4. Sandoval-Chin, Wilfreda

Appendix 2: Certain Respondents as of Date of Hearing (April 13, 2018)

K12 Program:

1. Alaniz, Robert
2. Alexander, Cheryl
3. Amini, Ali
4. Anyiam, Robert
5. Autrey, Deborah
6. Avila, Nancy
7. Barahona, Miguel
8. Butler, Cordiya
9. Chambers, Samantha
10. Deras, Ana
11. Ginsberg, Brent
12. Green, Toyin
13. Joel, Beth Anne Baker
14. Jones, Cayana
15. Jones, Tracy Sheneil
16. Lang, John
17. Lu, Yi Ping
18. Lund, Allison
19. Manning, James
20. Marquez, Fabiola
21. Martin, Ariana
22. McDonald, Carolyn
23. Najera, Maria
24. Orliczky, Thomas
25. Ramos, Zenaida
26. Raschilla, Nicholas
27. Schmidt, Kristofor
28. Tate, Robbie
29. Tran, Hoa
30. Tyndall, Randolph
31. Valenzuela, Claudia
32. White, Sandra
33. Young, Claudia

Preschool Program

1. Martinez, Alicia
2. Rocha, Ramona
3. Williams, Bonnie