

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CIVIL ACTION NO. 68-175-SA

DEMETRIO P. RODRIGUEZ, ET AL

vs.

SAN ANTONIO INDEPENDENT
SCHOOL DISTRICT, ET AL

ANSWERS TO INTERROGATORIES

I. Series of interrogatories relating to school funds provided each school district:

- (a) Sources of each district's income.

ANSWER:

1. Local ad valorem tax based on real and personal property.
2. State funds to support Foundation School Program which funds consist of the per capita payment made from the Available School Fund, and additional payments for most districts made directly from the Foundation Program School Fund.
3. Payments from the County Available Fund (quite small and not applicable to all counties).
4. Payments from the countywide equalization tax
5. Funds from Federally assisted programs
6. Tuition from non-resident pupils and gifts from private sources

- (b) Total market value of taxable property in each district at 100% valuation.

ANSWER: Not available; Texas Education Agency

does not require school districts to report total market value of taxable property.

(c) Percentage of market value at which each district's property is assessed. Give both claimed percentage and State's estimate of actual percentage.

ANSWER: Not available (Texas Education Agency does not require district to report percentage of market value at which property is assessed.)

(d) The tax rate of each district.

ANSWER: The maintenance tax rate and the debt service (bond) tax rates for each Texas school district for 1965-66, 1966-67, and 1967-68 are shown in Columns D-M, D-B of exhibits 1-a, 1-b, and 1-c. By school districts they are as follows:

1965-66 (Exhibit 1-a)

School District	Maintenance (D-M)	Bond (D-B)
Edgewood	.60	.59
North East	1.00	.45
Alamo Heights	.99	.21
SAISD	.97	.33
Harlandale	.83	.45
Northside	.55	.50
South San	1.05	.50

PLAINTIFFS' EXHIBIT XI

1966-67 (Exhibit 1-b)

School District	Maintenance (D-M)	Bond (D-B)
Edgewood	.60	.59
North East	1.00	.45
Alamo Heights	1.00	.20
SAISD	1.09	.34
Harlandale	.93	.50

Northside	.50	.70
South San	1.05	.50

1967-68 (Exhibit 1-c)

School District	Maintenance (D-M)	Bond	Bond Rate (D-B)
Edgewood	.52	.67	
North East	1.00	.45	
Alamo Heights	1.20	.20	
SAISD	1.09	.37	
Harlandale	.93	.50	
Northside	.65	.55	
South San	.85	.55	

(e) Amount of tax income each district receives from its ad valorem taxes.

ANSWER: The amount of tax income separate for maintenance and debt service is shown for 1965-66, 1966-67 and 1967-68 in Columns E-M and E-B of Exhibits 1-a, 1-b, and 1-c. They are as follows:

1965-66 (Exhibit 1-a)

School District	Maintenance Dollars (E-M)	Bond Dollars (E-B)
Edgewood	248,480	244,338
North East	2,185,840	1,107,290
Alamo Heights	1,112,456	236,182
SAISD	6,409,759	2,177,741
Harlandale	583,294	327,134
Northside	481,574	436,004
South San	285,719	136,069

1966-67 (Exhibit 1-b)

School District	Maintenance Dollars (E-M)	Bond Dollars (E-B)
Edgewood	258,596	254,286
North East	2,504,306	1,114,812
Alamo Heights	1,180,372	231,387
SAISD	7,544,990	2,544,541

Harlandale	737,891	397,646
Northside	904,289	770,189
South San	412,314	266,410

1967-68 (Exhibit 1-c)

School District	Maintenance Dollars (E-M)	Bond Dollars (E-B)
Edgewood	223,034	279,023
North East	2,818,148	1,249,159
Alamo Heights	1,433,473	236,074
SAISD	7,544,990	2,544,541
Harlandale	737,891	397,646
Northside	904,269	770,189
South San	412,314	266,410

(f) Amount of funds received by each district under the Minimum Foundation Program:

ANSWER: The amount of funds received under the Foundation School Program for the 1965-66, 1966-67 and 1967-68 school years for each district are furnished in Columns F-PC and MFP of Exhibits 1-a, 1-b, and 1-c. Column F-PC shows per capita payments while Column MFP gives payments made direct from the Foundation Fund. They are as follows:

1965-66 (Exhibit 1-a)

School District	Per Capita Dollars (F-PC)	Other Dollars in Minimum Foundation (MFP)
Edgewood	1,936,052	2,400,135
North East	1,864,064	2,533,616
Alamo Heights	513,205	550,108
SAISD	7,624,794	7,359,030
Harlandale	1,454,304	2,103,315
Northside	955,591	1,348,162
South San	564,553	860,222

1966-67 (Exhibit 1-b)

School District	Per Capita Dollars (F-PC)	Other Dollars in Minimum Foundation (MFP)
Edgewood	1,925,047	2,511,184
North East	2,098,785	2,766,250
Alamo Heights	523,061	561,055
SAISD	7,714,440	7,551,607
Harlandale	1,529,661	2,057,548
Northside	1,117,971	1,892,843
South San	609,959	826,094

1967-68 (Exhibit 1-c)

School District	Per Capita Dollars (F-PC)	Other Dollars in Minimum Foundation (MFP)
Edgewood	2,036,030	3,022,752
North East	2,384,679	3,436,407
Alamo Heights	567,945	645,037
SAISD	8,163,590	9,161,680
Harlandale	1,695,171	2,477,608
Northside	1,405,357	2,475,222
South San	684,620	1,084,816

(g) Amount of funds received by each district from the State, not derived from either the Minimum Foundation Program or ad valorem taxes collected by the district.

ANSWER: Column G of exhibits 1-b and 1-c furnish the amount of other funds received from the State for the 1966-67 and 1967-68 school years. Data for 1965-66 are not available on the computer tapes. They are as follows:

1966-67 (Exhibit 1-b)

School District	Other State Funds, i.e., supplemental salary and Incentive Aid (G)
Edgewood	29,900
North East	33,032

Alamo Heights	5,075
SAISD	68,888
Harlandale	22,750
Northside	0
South San	0

1967-68 (Exhibit 1-c)

School District	Other State Funds, i.e., supplemental salary and Incentive Aid (G)
Edgewood	20,350
North East	47,232
Alamo Heights	9,060
SAISD	140,400
Harlandale	30,705
Northside	0
South San	0

(h) Amount of funds received by each district from the federal government basis for such funds.

ANSWER: Total Federal funds received by each school district for 1965-66, 1966-67 and 1967-68 are shown in Column H of Exhibits 2-a, 2-b, and 2-c. Time constraints did not permit a break down of the specific Federal programs in each district and the amounts received by each district. Figures are as follows:

Amount of Funds received from Federal Agencies
(Exhibits 2-a, b, and c)

School District	1965-66	1966-67	1967-68
Edgewood	2,230,302	2,366,051	2,376,695
North East	1,150,734	1,079,610	1,189,048
Alamo Heights	188,801	223,609	186,154
SAISD	4,869,830	5,890,822	5,550,113
Harlandale	1,219,200	924,108	1,118,398
Northside	1,478,251	1,235,381	1,188,821
South San	559,697	773,648	1,003,880

(i) Amount of funds received by each district from private sources and please state the sources.

ANSWER: We do not have a separate total for funds received by school districts from private sources. Column I of Exhibits 2-a, 2-b, 2-c give total funds received by school districts from private gifts, parental tuition paid and transportation fees, if any. Figures are as follows:

**Amount of Funds Received from Private Sources,
i.e., gifts, etc.**
(Exhibits 2-a, b, and c)

School District	1965-66	1966-67	1967-68
Edgewood	17,286	39,649	80,830
North East	273,761	248,303	526,812
Alamo Heights	53,673	115,451	141,784
SAISD	627,822	560,295	668,062
Harlandale	71,817	99,569	92,893
Northside	50,522	166,639	130,742
South San	29,652	30,456	95,640

(j) Amount of funds received by each district from other sources and please designate the sources.

ANSWER: Column J of Exhibits 2-a, 2-b, and 2-c furnishes the amounts funds received by school districts from "other" sources. Such sources are usually from the county available school fund and/or from a county-wide equalization tax. Column J is as follows:

**Amount of Funds Received from other Sources;
County Available, County Equalization, etc.**

School District	1965-66	1966-67	1967-68
Edgewood	177	199	205
North East	176	203	220
Alamo Heights	50	56	54
SAISD	735	909	819
Harlandale	145	159	160
Northside	83	104	118
South San	55	61	64

(k) Each school district's expenditure per pupil and please provide the formula used to arrive at such expenditure.

ANSWER: Per pupil expenditures by district for 1966-67 are shown in Exhibit 3-a, *Annual Statistical Report, Part II, Texas Education Agency Bulletin No. 680*. For the 1967-68 school year per pupil expenditures are shown in the last column of computer print-out marked Exhibit 3-b. Per pupil expenditure is determined by dividing total expenditures for current operation by the gross average daily attendance of the school district.

**School District's Expenditures Per Pupil
(Exhibits 3-a and b)**

School District	1966-67	1967-68
Edgewood	289.83	334.05
North East	389.96	439.83
Alamo Heights	499.84	576.62
SAISD	392.80	428.88
Harlandale	348.07	378.50
Northside	348.34	409.75
South San	370.40	403.49

(1) The amount of each school district's bonded indebtedness:

ANSWER: The amounts of each school district's bonded indebtedness as reported for 1965-66, 1966-67, and 1967-68 are shown in Column L of Exhibits 2-a, 2-b, and 2-c. Figures are as follows:

**Amount of Bonded Indebtedness
(Exhibits 2-a, b and c)**

School District	1965-66	1966-67	1967-68
Edgewood	3,133,000	3,632,000	4,419,000
North East	18,581,000	18,102,000	24,301,000
Alamo Heights	2,739,000	2,847,000	6,947,000

SAISD	25,477,000	23,726,000	26,940,000
Harlandale	7,296,000	7,697,000	7,993,000
Northside	7,517,000	9,983,000	11,257,000
South San	2,705,000	4,349,000	4,302,000

(m) Breakdown of each school district's expenditures in the following categories:

1. annual payment of bonded indebtedness
2. operation expenses
3. other expenses, if any, and please describe

ANSWER: The breakdown of each school district's expenditures in the three categories requested.

1. Annual payment of bonded indebtedness for the 1965-66, 1966-67, and 1967-68 school years shown in Column M-1 of Exhibits 4-a, 4-b, and 4-c.

2. Operation expenses for the three years are shown in Column M-2 of Exhibits 4-a, 4-b, and 4-c.

3. Other expenses for the three years are given in Column M-3 of Exhibits 4-a, 4-b, and 4-c. Such expenses are primarily for the construction of new physical facilities and/or for the renovation of existing facilities. Tables are as follows:

1965-66
(Exhibits 4-a, b, and c)

School District	Annual Payments of Bonded Indebtedness	Operation Expenses	Other Expenses
Edgewood	211,191	5,687,297	1,065,084
North East	1,131,207	7,036,593	2,434,944
Alamo Heights	223,848	2,269,546	119,027
SAISD	2,521,034	25,496,329	4,692,987
Harlandale	345,585	5,176,211	939,707
Northside	422,914	3,533,899	1,643,261
South San	124,851	1,968,662	456,888

1966-67
(Exhibits 4-a, b, and c)

School District	Annual Payments of Bonded Indebtedness	Operation Expenses	Other Expenses
Edgewood	216,750	6,156,818	1,242,057
North East	1,174,095	8,263,243	353,152
Alamo Heights	226,427	2,453,027	406,976
SAISD	2,490,888	28,158,770	2,786,896
Harlandale	369,193	5,307,753	316,209
Northside	712,036	4,370,234	3,282,007
South San	147,750	2,326,891	418,709

1967-68
(Exhibits 4-a, b, and c)

School District	Annual Payments of Bonded Indebtedness	Operation Expenses	Other Expenses
Edgewood	257,048	6,900,778	2,020,156
North East	1,123,928	10,123,309	5,441,682
Alamo Heights	234,585	2,818,146	232,971
SAISD	2,484,265	30,536,572	1,740,565
Harlandale	393,998	5,846,947	790,846
Northside	771,816	5,866,049	1,456,964
South San	228,742	2,736,203	801,192

II. This series of interrogatories relates to general population and school population in each district.

(a) The number of people in each district:

ANSWER: No information available.

(b) The number of students in each district going to district schools:

Answer: May be found for 1966-67 in Exhibit 5-a, *Annual Statistical Report, Part I*, 1966-67 school year. Data for 1967-68 are shown in computer printout labeled Exhibit 5-b. Tables are as follows:

Enrollment (1966-67)

Exhibit 5-a

School District	Elementary	Secondary	Total
Edgewood	17,785	5,022	22,807
North East	15,607	7,565	23,172
Alamo Heights	3,400	2,000	5,400
SAISD	55,046	23,717	78,763
Harlandale	11,951	4,496	16,447
Northside	10,497	3,302	13,799
South San	5,432	1,482	6,914

Enrollment (1967-68)

Exhibit 5-b

School District	Elementary	Secondary	Total
Edgewood	17,572	5,290	22,862
North East	16,794	8,452	25,246
Alamo Heights	3,307	2,125	5,432
SAISD	55,710	24,406	80,116
Harlandale	12,120	4,720	16,840
Northside	11,628	4,139	15,767
South San	6,025	1,603	7,628

(c) The number of students in each district going to schools other than district schools.

ANSWER: Not available.

(d) A breakdown of the student population showing the number of students in each grade.

ANSWER: Enrollments by district by grade for 1965-66, 1966-67, 1967-68 and 1968-69 are furnished in Exhibits 6-a, 6-b, 6-c, and 6-d. Tables are as follows:

Enrollment by Grade (1965-66)
(Exhibit 6-a)

School District	1	2	3	4	5	6	7	8	9	10	11	12	Special Education
Edgewood	2834	2364	2415	2200	2017	1993	1874	1611	1392	1129	913	733	364
North East	1715	1802	1934	1876	1795	1966	1970	1856	1712	1617	1598	1398	144
Alamo Hts.	416	396	389	422	395	400	513	454	515	445	455	419	80
SAISD	7778	7490	7205	6901	6833	6576	6991	6431	6232	6201	5006	4283	524
Harlandale	1643	1572	1513	1487	1381	1382	1404	1270	1163	1142	908	772	298
Northside	1206	1256	1272	1211	1166	1031	994	883	719	731	575	455	235
South San	842	733	659	637	610	594	478	409	403	359	255	199	208

(Exhibit 6-b)
Enrollment by Grade 1966-67)

School District	1	2	3	4	5	6	7	8	9	10	11	12	Special Education
Edgewood	2876	2453	2269	2301	2191	2011	1964	1720	1590	1253	966	846	367
North East	1777	1940	1894	2054	1982	1906	2147	2117	2094	1888	1664	1514	197
Alamo Hts.	397	421	416	424	404	427	435	512	538	481	426	432	87
SAISD	7709	7155	7072	6954	6649	6652	6780	6470	6166	6581	5298	4616	661
Harlandale	1714	1603	1514	1508	1473	1411	1391	1381	1235	1168	884	820	345
Northside	1320	1571	1323	1407	1311	1300	1159	1106	990	824	697	527	264
South San	918	768	699	684	662	636	599	466	433	355	274	227	193

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Enrollment by Grade (1967-68)
(Exhibit 6-c)

School District	1	2	3	4	5	6	7	8	9	10	11	12	Special Education
Edgewood	2638	2408	2333	2197	2215	2149	1933	1699	1693	1329	1070	824	374
North East	1971	2056	2141	2121	2216	2109	2155	2299	2415	2065	1875	1647	176
Alamo Hts.	380	395	415	431	439	417	466	427	571	499	465	431	96
SAISD	7983	7057	7133	6860	6750	6752	7088	6478	6250	6563	5608	4789	805
Harlandale	1605	1658	1598	1525	1514	1439	1399	1414	1392	1162	917	827	390
Northside	1486	1500	1657	1480	1526	1394	1413	1172	1336	949	782	670	402
South San	978	875	793	772	703	662	644	598	504	396	306	215	182

Enrollment by Grade (1968-69)
(Exhibit 6-d)

School District	1	2	3	4	5	6	7	8	9	10	11	12	Special Education
Edgewood	2706	2325	2303	2300	2096	2214	2226	1694	1707	1344	1086	950	421
North East	1971	2168	2217	2219	2239	2295	2277	2198	2707	2360	1983	1832	241
Alamo Hts.	394	359	394	411	384	450	437	462	493	519	461	444	83
SAISD	7444	7159	7228	6879	6723	6736	7066	6555	6346	6793	5386	5077	982
Harlandale	1733	1572	1676	1563	1560	1524	1533	1421	1428	1270	960	868	407
Northside	1602	1745	1680	1763	1634	1656	1628	1435	1411	1277	917	760	468
South San.	982	948	862	831	775	712	652	600	559	420	314	246	164

III. This series of interrogatories relates to the income of the families in the respective school districts. Please provide:

- (a) The average per capita income in each district.
- (b) The average income of each wage earner in each district.
- (c) The average number of school-aged children per family in each district.

ANSWER: The Texas Education Agency does not have the data requested for items (a), (b) or (c).

IV. This series of interrogatories relates to teacher characteristics in each school district. Please provide:

- (a) Total number of teachers in each district.

ANSWER: The total number of teachers in each district for 1965-66, 1966-67, 1967-68 and 1968-69 are shown in Column IV-A of Exhibits 7-a, b, c, and d.

Total Number of Teachers
(Exhibits 7-a, b, c, and d)

School District	1965-66	1966-67	1967-68	1968-69
Edgewood	759	780	864	841
North East	871	984	1,052	1,153
Alamo Heights	235	248	265	269
SAISD	2,687	2,746	2,809	2,841
Harlandale	612	620	651	681
Northside	430	508	627	696
South San	226	245	268	298

- (b) The average number of teachers per school in each district.

ANSWER: No data available.

- (c) The student-teacher ratio per grade in each district.

ANSWER: No data available.

(d) The percent of teachers with college degrees.

ANSWER: The percent of teachers with college degrees in each district for the four years listed in (a) is shown in Column IV-D of Exhibits 7-a, b, c, and d. Figures are as follow:

**Percent of Teachers with College Degrees
(Exhibits 7-a, b, c, and d)**

School District	1965-66	1966-67	1967-68	1968-69
Edgewood	75.75%	74.87%	75.34%	80.02%
North East	100.00	99.49	99.52	100.00
Alamo Hts.	100.00	100.00	100.00	100.00
SAISD	98.36	97.92	98.18	98.76
Harlandale	97.38	95.16	94.77	96.47
Northside	99.53	99.40	99.36	99.71
South San	91.59	91.83	93.65	95.97

(e) The percent of teachers with bachelor degrees.

ANSWER: The percent of teachers with Bachelor's Degrees only is given in Column IV-E of the above listed Exhibits or 7-a, b, c, and d. The figures are as follows:

**Percent of Teachers with Bachelor's Degrees
(Exhibits 7-a, b, c, and d)**

School District	1965-66	1966-67	1967-68	1968-69
Edgewood	58.76%	58.85%	60.64%	65.04%
North East	73.93	74.39	75.38	76.32
Alamo Hts.	60.42	60.08	59.62	62.45
SAISD	66.50	67.37	69.02	69.13
Harlandale	74.18	73.70	73.42	75.33
Northside	79.30	78.54	79.10	79.31
South San	68.14	74.28	76.49	81.54

(f) The percent of teachers with Masters Degrees.

ANSWER: The percent of teachers by districts with

Master's Degrees is shown in Column IV-F of the same Exhibits. Figures are as follows:

Percent of Teachers with Master's Degrees
(Exhibits 7-a, b, c, and d)

School District	1965-66	1966-67	1967-68	1968-69
Edgewood	16.86%	16.02%	14.69%	14.98%
North East	25.94	25.20	24.14	23.59
Alamo Hts.	39.57	39.51	40.00	36.80
SAISD	31.81	30.55	29.08	29.56
Harlandale	23.20	21.45	21.35	21.14
Northside	20.23	20.86	20.25	20.40
South San	23.45	17.14	17.16	14.42

(g) The percent of teachers with Doctorate Degrees.

ANSWER: The percent of teachers with Doctorate Degrees is found in Column IV-G of the same four Exhibits 7-a, b, c, and d. Figures are as follows:

Percent of Teachers with Doctorate Degrees
(Exhibits 7-a, b, c, and d)

School District	1965-66	1966-67	1967-68	1968-69
Edgewood	0%	0%	0%	0%
North East	0	0	0	0
Alamo Heights	0	.40	.37	.37
SAISD	.03	0	.03	.03
Northside	0	0	0	0
South San	0	0	0	0
Harlandale	0	0	0	0

(h) The percent of teachers with provisional certificates of education.

ANSWER: Not available.

(i) The percent of teachers without permanent certificates of education.

ANSWER: Not available.

(j) The percent of teachers without certificates of education.

ANSWER: The number of teachers with emergency permits for the 1966-67 school year by school district is shown in the last column of Exhibit 7-b. No tabulations are available by district for the other years.

**Number of Emergency Permits
(Exhibit 7-b)**

School District	1966-67
Edgewood	412
North East	82
Alamo Heights	28
SAISD	478
Harlandale	149
Northside	109
South San	99

(k) Any other credentials teachers in each school district have that would add to their qualifications.

ANSWER: No data available.

(l) The number and percentage of teachers in each school district that have, according to the standards of the School district, State Education Agency, Department of Health, Education and Welfare, or any other government agency, substandard preparation or sub-standard qualifications.

ANSWER: Those teachers on emergency permits as shown in Exhibit 7-b would be considered as having substandard preparation by this Agency. (See IV-j above)

(m) The salary scale of teachers, broken down according to qualifications and experience.

ANSWER: The Texas Education Agency does not collect salary schedules by school district. A report of

such schedules for 1968-69 as compiled by the Texas State Teachers' Association is included as Exhibit 8. Schedule is as follows:

Basic Salary Schedules for Teachers (1968-69)
(Exhibit 8)

School District	Degree	Minimum Salary	Maximum Salary
Edgewood	BA	\$4,734	\$5,904
	MA	5,040	6,912
North East	BA	5,400	7,310
	BA + 15 hours	5,500	7,460
	MA	5,800	8,550
	MA + 30 hours	6,100	8,850
	Doctorate	6,400	9,150
Alamo Hts.	BA	5,400	7,320
	MA	5,600	8,300
SAISD	BA	5,511	7,519
	MA	5,665	8,240
Harlandale	BA	5,200	6,354
	MA	5,500	7,362
Northside	BA	5,328	6,498
	MA	5,634	7,506
South San	BA	5,139	6,309
	MA	5,445	7,317

(n) Omitted

(o) The salary expenditure for teachers per student.

ANSWER: Salary expenditures for teachers per student for 1966-67, 1967-68, and 1968-69 are shown in Column IV-o of Exhibits 9-b, c, and d. Figures are as follows:

**Salary Expenditures for Teachers per Student
(Exhibits 9-b, c, and d)**

School District	1966-67	1967-68	1968-69
Edgewood	166.75	210.07	209.07
North East	216.75	276.00	287.93
Alamo Heights	258.18	357.95	372.07
SAISD	188.14	240.85	250.54
Harlandale	195.03	245.97	248.47
Northside	190.62	260.28	257.57
South San	187.69	230.10	237.54

(p) The turnover rate of teachers.

ANSWER: Valid data not available.

V. This series of interrogatories relates to student characteristics. Please provide:

(a) The number of students in each school district. Please describe how this figure is obtained.

ANSWER: The number of scholastics in each school district for 1966-67 is found in Exhibit 5-a. The same figures for 1967-68 are shown in Exhibit 5-b. A scholastic is a child between the ages of six (6) and seventeen (17) inclusive. Data was taken from the Census tabulations supplied to this Agency by local school districts. If (a) refers to pupils actually enrolled in public schools, the total for each district may be found in the same Exhibits. Figures are as follows:

**Enrollment (1966-67)
(Exhibit 5-a)**

School District	Elementary	Secondary	Total
Edgewood	17,785	5,022	22,807
North East	15,607	7,565	23,172
Alamo Heights	3,400	2,000	5,400
SAISD	55,046	23,717	78,763
Harlandale	11,951	4,496	16,447
Northside	10,497	3,302	13,799
South San	5,432	1,482	6,914

Enrollment (1967-68)

(Exhibit 5-b)

School District	Elementary	Secondary	Total
Edgewood	17,572	5,290	22,862
North East	16,794	8,452	25,246
Alamo Heights	3,307	2,125	5,432
SAISD	55,710	24,406	80,116
Harlandale	12,120	4,720	16,840
Northside	11,628	4,139	15,767
South San	6,025	1,603	7,628

Scholastic Population (1966-67)

(Exhibit 5-a)

School District	White	Negro	Total
Edgewood	21,403	1,290	22,693
North East	24,454	0	24,454
Alamo Heights	6,034	19	6,053
SAISD	79,899	11,041	90,940
Harlandale	17,723	19	17,742
Northside	12,955	109	13,064
South San	7,044	42	7,086

Scholastic Population (1967-68)

(Exhibit 5-b)

School District	White	Negro	Total
Edgewood	21,483	1,322	22,805
North East	25,625	8	25,633
Alamo Heights	6,075	19	6,094
SAISD	78,639	11,343	89,982
Harlandale	18,178	25	18,203
Northside	15,005	150	15,155
South San	7,324	34	7,358

(b) The number and percentage of drop-outs per year in each school district.

ANSWER: Data not available.

(c) The number of withdrawals per year in each district.

ANSWER: Data not available.

(d) The percentage of Spanish surname and/or Mexican-American students in each school and in each district.

(e) The percentage of Negro students in each school and in each district.

(f) The percentage of Anglo-American students in each school and in each district.

ANSWERS TO (d), (e), and (f): See Exhibit No. 10.

(Note: School campuses are listed by number . . . names not available on computer tape).

(Figures for IV-(d), (e), and (f) are as follows:

Please see next page for data.

Number and Percent of Anglo-American, Spanish Surname,
and Negro Students in Each School and In Each District

(Exhibit 10)
(d), (e) and (f)

School District and Campus		(f)		(e)		(d)		Total Number of Students
		No. of Anglo- Ameri- can Students	%	No. of Negro Students	%	No. of Mexican- Ameri- can Students	%	
Edgewood	001	43	2.19	164	8.35	1,755	89.44	1,962
	002	75	3.96	67	3.53	1,749	92.39	1,893
	003	11	.91	29	2.42	1,152	96.24	1,197
	041	56	10.54	20	3.76	455	85.68	531
	042	3	.34	0	0.00	859	99.65	862
	043	2	.16	3	.24	1,205	99.58	1,210
	044	0	.00	283	60.47	185	39.52	468
	045	27	2.55	16	1.51	1,014	95.93	1,057
	101	56	7.90	3	.42	649	91.66	708
	102	0	.00	1	.15	638	99.84	639
	103	1	.44	0	0.00	222	99.55	223
	105	3	.37	1	.12	786	99.49	790
	106	7	.69	0	0.00	999	99.30	1,006
	107	20	1.90	0	0.00	1,031	98.09	1,051
	108	9	.72	8	.64	1,223	98.62	1,240
	109	0	.00	276	66.50	139	33.49	415
	110	6	.70	7	.82	837	98.47	850
	111	2	.45	238	53.72	203	45.82	443
	112	45	3.47	5	.38	1,246	96.14	1,296
	113	1	.15	0	0.00	662	99.84	663
	114	15	1.32	11	.97	1,100	97.43	1,129
	115	10	1.56	0	0.00	630	98.43	640
	116	466	55.01	183	21.60	174	20.54	847
	117	5	1.59	82	26.19	226	72.20	313
	184	0	.00	3	.38	785	99.61	788
Edgewood	District Totals	863	3.88	1,400	6.30	19,924	89.66	22,221

Northeast	001	2,257	91.00	0	.00	207	8.34	1,992
	002	1,922	96.48	1	.05	65	3.26	2,239
	004	1,767	89.60	2	.10	191	9.68	1,972
	041	971	96.32	0	.00	35	3.47	1,008
	042	984	96.94	0	.00	31	3.05	1,015
	043	1,077	92.44	7	.60	75	6.43	1,165
	044	1,091	90.91	0	.00	107	8.91	1,200
	101	403	94.15	0	.00	25	5.84	428
	102	618	95.37	0	.00	29	4.47	648
	103	653	91.84	0	.00	55	7.73	711
	104	590	87.40	1	.14	84	12.44	675
	105	712	88.55	4	.49	73	9.07	804
	106	915	93.27	1	.10	65	6.62	981
	107	539	91.20	1	.16	50	8.46	591
	108	489	96.83	0	.00	15	2.97	505
	109	403	93.50	0	.00	19	4.40	431
	110	470	97.30	0	.00	12	2.48	483
	111	665	81.19	0	.00	149	18.19	819
	112	707	90.29	0	.00	71	9.06	783
	113	598	85.06	0	.00	104	14.79	703
	114	652	89.31	1	.13	69	9.45	730
	115	554	81.23	0	.00	124	18.18	682
	116	671	93.71	5	.69	38	5.30	716
	117	542	97.30	0	.00	11	1.97	557
	118	514	88.16	3	.51	45	7.71	583
	119	269	72.11	0	.00	104	27.88	373
	120	465	93.37	0	.00	30	6.02	498

Northeast	District Totals	23,708	91.99	26	.10	1,903	7.38	25,772
Alamo Heights	001	1,729	91.87	5	.26	143	7.59	1,882
	041	760	85.58	2	.22	125	14.07	888
	101	765	95.62	10	1.25	24	3.00	800
	102	347	67.64	0	.00	163	31.77	513
	103	247	51.89	0	.00	253	47.91	528
	104	524	94.41	5	.90	23	4.14	555

Alamo Hts.

Totals	4,399	85.15	22	.42	731	14.15	5,166	
SAISD	001	99	4.78	628	30.35	1,339	64.71	2,069
	002	308	13.03	0	.00	2,052	86.87	2,362
	003	1,019	66.04	43	2.78	470	30.46	1,543
	004	9	.38	43	1.82	2,306	97.79	2,358
	005	1,891	71.22	313	11.78	447	16.83	2,655
	006	817	65.56	292	23.43	131	10.51	1,246
	008	42	1.79	4	.17	2,293	98.03	2,339
	009	0	.00	806	99.75	2	.24	808
	041	840	79.92	2	.19	208	19.79	1,051
	042	1	.07	5	.39	1,268	99.52	1,274
	043	500	61.05	174	21.24	143	17.46	819
	044	0	.00	363	99.45	2	.54	365
	045	0	.00	199	97.54	5	2.45	204
	046	18	2.35	548	71.72	198	25.91	764
	047	35	4.24	1	.12	786	95.27	825
	048	172	29.75	45	7.78	358	61.93	578
	049	37	2.45	71	4.70	1,397	92.57	1,509
	050	796	65.83	2	.16	411	33.99	1,209
	051	275	26.26	24	2.29	746	71.25	1,047
	052	346	36.07	32	3.33	572	59.64	959
	053	216	22.47	19	1.97	726	75.54	961
	054	34	3.97	508	59.41	310	36.25	855
	055	4	.34	5	.42	1,154	99.22	1,163
	056	0	.00	507	99.02	5	.97	512
	057	935	82.67	6	.53	187	16.53	1,131
	058	329	34.63	48	5.05	570	60.00	950
	059	687	67.68	1	.09	325	32.01	1,015
	060	437	59.05	210	28.37	84	11.35	740
	101	295	78.87	0	.00	77	20.58	374
	102	49	13.10	7	1.87	311	83.15	374
	103	368	70.36	1	.19	152	29.06	523
	104	11	1.55	0	.00	698	98.44	709
	105	395	81.44	0	.00	84	17.13	485
	106	85	18.24	16	3.43	363	77.89	466

107	1,649	47.14	121	3.45	1,679	47.99	3,498
108	30	3.59	21	2.51	780	93.52	834
110	5	.41	16	1.33	1,179	98.25	1,200
111	0	.00	9	.93	956	99.06	965
112	27	4.47	0	.00	575	95.19	604
113	54	7.71	153	21.85	493	70.42	700
114	0	.00	201	99.01	2	.98	203
115	34	4.14	0	.00	787	95.85	821
116	94	10.03	0	.00	841	89.75	937
117	141	29.80	2	.42	330	69.76	473
118	38	3.59	0	.00	1,019	96.40	1,057
119	0	.00	501	99.60	2	.39	503
120	182	84.65	20	9.30	13	6.04	215
121	14	2.02	0	.00	678	97.97	692
122	2	.45	316	71.81	122	22.72	440
123	57	13.47	5	1.18	361	85.34	423
124	245	63.47	12	3.10	127	32.90	386
125	499	77.12	17	2.62	131	20.24	647
126	247	59.80	1	.24	164	39.70	413
127	0	.00	1,009	97.58	25	2.41	1,034
128	28	26.41	0	.00	76	71.69	106
129	342	16.73	2	.09	1,696	82.97	2,044
130	0	.00	469	97.10	14	2.89	483
131	56	23.62	2	.84	179	75.52	237
132	13	3.15	147	35.67	249	60.43	412
133	0	.00	63	24.80	191	75.19	254
134	741	92.85	4	.50	52	6.51	798
135	227	36.49	24	3.85	364	58.52	622
136	72	8.53	0	.00	768	90.99	844
137	599	84.36	0	.00	107	15.07	710
138	15	4.34	1	.28	329	95.36	345
139	163	24.77	3	.45	490	74.46	658
140	13	1.96	0	.00	650	98.03	663
141	54	30.00	15	8.33	111	61.66	180
142	22	3.36	0	.00	631	96.63	653
143	98	19.36	5	.98	403	79.64	506

144	54	5.07	8	.75	1,000	93.98	1,064	
145	9	3.47	0	.00	250	96.52	259	
146	154	64.97	3	1.26	79	33.23	237	
147	54	8.23	217	33.07	385	58.68	656	
148	293	43.99	1	.15	372	55.85	666	
149	15	2.31	8	1.23	624	96.29	648	
150	351	69.09	0	.00	152	29.92	508	
151	26	21.31	1	.81	95	77.86	122	
152	89	27.13	4	1.21	234	71.34	328	
153	0	.00	810	95.27	34	4.02	844	
154	25	5.47	8	1.75	424	92.77	457	
155	235	53.28	0	.00	205	46.48	441	
156	11	2.33	206	43.73	254	53.92	471	
157	63	5.86	18	1.67	994	92.46	1,075	
158	35	4.68	453	60.64	258	34.53	747	
159	257	74.92	9	2.62	65	18.95	343	
160	137	27.02	0	.00	370	72.97	507	
161	251	54.09	0	.00	212	45.68	464	
162	10	1.54	0	.00	636	98.45	646	
164	936	86.34	1	.09	147	13.56	1,084	
165	22	2.48	400	45.19	463	52.31	885	
166	0	.00	22	17.46	104	82.53	126	
167	241	64.78	0	.00	131	35.21	372	
168	154	20.05	211	27.47	398	51.82	768	
169	37	3.42	1	.09	1,043	96.48	1,081	
170	178	36.77	7	1.44	294	60.74	484	
171	0	.00	432	97.07	13	2.92	445	
172	0	.00	746	99.73	2	.26	748	
173	533	78.61	7	1.03	132	19.46	678	
174	163	38.44	0	.00	261	61.55	424	
175	160	26.53	0	.00	441	73.13	603	
176	168	44.56	2	.53	205	54.37	377	
SAISD								
Totals		21,472	26.71	11,637	14.48	47,031	58.52	80,360
Harlan-	001	523	28.56	1	.05	1,307	71.38	1,831
dale	002	1,224	67.17	0	.00	598	32.82	1,822

041	688	36.10	2	.10	1,180	63.78	1,850	
042	36	2.89	1	.08	1,206	97.02	1,243	
043	607	63.49	0	.00	347	36.29	956	
044	255	66.23	0	.00	130	33.76	385	
101	265	53.64	0	.00	227	45.95	494	
102	685	78.01	2	.22	191	21.75	878	
103	42	5.57	4	.53	708	93.89	754	
104	34	3.31	0	.00	993	96.68	1,027	
105	23	4.56	0	.00	481	95.43	504	
106	169	25.18	1	.14	501	74.66	671	
107	368	61.84	0	.00	227	38.15	595	
108	604	60.64	0	.00	392	39.35	996	
109	163	26.12	0	.00	460	73.71	624	
110	212	30.02	0	.00	494	69.97	706	
111	376	80.68	0	.00	90	19.31	466	
112	35	4.48	0	.00	746	95.51	781	
113	197	33.33	0	.00	394	66.66	591	
114	372	59.04	7	1.11	251	39.84	630	
115	36	36.73	0	.00	62	63.26	98	
Harlandale								
Totals	6,894	38.50	18	.10	10,985	61.36	17,902	
Northside	000	6	9.83	5	8.19	50	81.96	61
	001	820	79.53	19	1.84	189	18.33	1,011
	002	1,573	88.56	26	1.46	171	9.62	1,776
	003	1,279	92.14	2	.14	104	7.49	1,388
	041	1,004	93.13	1	.09	70	6.49	1,078
	042	638	87.51	26	3.56	63	8.64	729
	043	820	71.99	35	3.07	282	24.75	1,139
	101	364	47.21	20	2.59	387	50.19	771
	102	559	83.68	22	3.29	75	11.22	668
	103	373	91.87	3	.73	29	7.14	406
Southside	104	242	80.93	0	.00	57	19.96	299
	105	751	83.25	8	.88	126	13.96	902
	106	708	88.72	28	3.50	60	7.51	798
	107	45	68.18	1	1.51	20	30.30	66
	108	358	83.84	3	.70	66	15.45	427

109	394	85.46	0	.00	64	13.88	461
110	32	58.18	2	3.63	21	38.18	55
111	364	79.82	0	.00	88	19.29	456
112	434	71.97	8	1.32	161	26.69	603
113	553	90.35	16	2.61	42	6.86	612
114	805	79.07	35	3.43	171	16.79	1,018
115	712	93.19	0	.00	52	6.80	764
116	11	100.00	0	.00	0	.00	11
117	287	53.74	21	3.93	224	41.94	534
119	339	94.16	1	.27	20	5.55	360
Northside							
Totals	13,471	82.07	282	1.71	2,592	15.79	16,413
South San							
001	575	38.72	9	.60	869	58.51	1,485
041	441	34.69	12	.94	815	64.12	127
101	166	35.93	0	.00	296	64.06	462
103	139	23.16	4	.66	456	76.00	600
104	205	61.74	0	.00	127	38.25	332
105	0	.00	2	.23	867	99.76	869
106	23	6.26	0	.00	344	93.73	367
107	90	17.64	22	4.31	377	77.84	510
108	1,456	90.26	54	3.34	102	6.32	1,613
South San							
Totals	3,095	41.21	103	1.37	4,273	56.90	7,509

**Totals of Number and Percent of Anglo-American Spanish
Surname, and Negro Students by District**

(1968-69)

(Exhibit 10)

(d), (e), and (f)

Edgewood	863	3.88	1,400	6.30	19,924	89.66	22,221
North East	23,708	91.99	26	.10	1,903	7.38	25,772
Alamo Heights	4,399	85.15	22	.42	731	14.15	5,166
SAISD	21,472	26.71	11,637	174.48	47,031	58.52	80,360
Harlandale	6,894	38.50	18	.10	10,985	61.36	17,902
Northside	13,471	82.07	282	1.71	2,592	15.79	16,413
South San	3,095	41.21	103	1.37	4,273	56.90	7,509

(g) The percentage of students in special education with the breakdown of the categories of special education.

ANSWER: Not available.

(h) The percentage of first graders who speak only Spanish.

ANSWER: Not available.

VI. This series of interrogatories relates to the physical plant in each school district. Please provide:

(a) The average age of the physical facilities in the district.

(b) The type of construction of the physical facilities in the district.

(c) The condition of the physical facilities in the district.

(d) The average number of students per class.

(e) The type of heating or air-conditioning system in the schools.

(f) The number of temporary structures.

(g) The land area that is used for school programs.

(h) The gymnasium space.

(i) The laboratory space.

(j) The number of substandard or dilapidated buildings.

ANSWER: The Texas Education Agency does not have sufficient data to respond to any of the questions listed.

VII. This series of interrogatories relates to the administrative and advisory personnel in each district. Please provide:

(a) The background qualifications and educational qualifications of each principal.

ANSWER: All full time principals are required to hold the appropriate administrators' certificate.

(b) The number of vice-principals in each school and each district and their qualifications and backgrounds.

ANSWER: The Texas Education Agency does not have available the exact number of vice-principals in each district since some vice-principals are actually reported as full-time principals for Foundation Program purposes. A vice-principal who spends the majority of his time in administration must hold an administrator's certificate.

(c) The number of counselors in each school and in each district and their backgrounds and qualifications.

ANSWER: School districts do not report counselors employed by school campus . . . only in total for the district. Columns B and M of Exhibits 9-a, b, c, and d show degree status of counselors by district for 1966-67—1968-69 inclusive. The sum of the two columns represents total counselors employed. Figures are as follows:

Counselors and Degree Status
(Exhibit 9-a, b, c, and d)

School District	Bachelor's Degree	Master's Degree	Doctorate's Degree	Total Counselors Per Year
Edgewood				
1966-67	1	5		6
1967-68	1	6		7
1968-69		5		5
TOTALS	2	16		18
North East				
1966-67	1	14		15

1967-68	1	15	16
1968-69		22	22
TOTALS	2	51	53
Alamo Heights			
1966-67		5	5
1967-68		8	8
1968-69		5	5
TOTALS		18	18
SAISD			
1966-67		29	1
1967-68		33	33
1968-69		29	29
TOTALS		91	1
Harlandale			
1966-67		7	7
1967-68		9	9
1968-69		8	8
TOTALS		24	24
Northside			
1966-67	1	8	9
1967-68		10	10
1968-69		9	9
TOTALS	1	27	28
South San			
1966-67		3	3
1967-68		4	4
1968-69	1	3	1
TOTALS	1	10	12

(d) The Counselor-Student ratio.

ANSWER: Column VII D of Exhibits 9-a, b, c, and d furnishes the counselor-student ratio for each district for the three year period. Figures are as follows:

Counselor-Student Ratio
(Exhibit 9-a, b, c, and d)

School District	1966-67	1967-68	1968-69
Edgewood	3,579	3,098	4,397
North East	1,486	1,516	1,171
Alamo Heights	1,030	645	1,018
SAISD	2,513	2,320	2,649
Harlandale	2,261	1,800	2,120
Northside	1,446	1,493	1,877
South San	2,092	1,752	1,496

NOTE: Numbers listed under the respective years represent the number of students per counselor.

(e) The degrees of the above persons.

ANSWER: Included in answer to number VII (c).
Table is as follows:

Degrees of Counselors (Exhibit 9-a, b, c, and d)			
School District	1966-67	1967-68	1968-69
Edgewood			
Bachelor's	1	1	0
Master's	5	6	5
North East			
Bachelor's	1	1	0
Master's	14	15	22
Alamo Heights			
Bachelor's	0	0	0
Master's	5	8	5
SAISD			
Bachelor's	0	0	0
Master's	29	33	29
Doctorate	1	0	0
Harlandale			
Bachelor's	0	0	0
Master's	7	9	8

Northside

Bachelor's	1	0	0
Master's	8	10	9
South San			
Bachelor's	0	0	1
Master's	3	4	3
Doctorate	0	0	1

(f) The salaries of the above persons.

ANSWER: Column F-M (last column on printout pages) of Exhibits 9-b, c, d shows total salaries paid counselors for 1966-67, 1967-68 and 1968-69. Average salary may be computed by dividing total salaries by number of counselors employed by a district. Salary figures in Exhibit 9-a (1965-66) should be disregarded as only Foundation Salary not actually paid was available for that year.

Total Salaries Paid Counselors (1966-67)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood	\$5,640	\$ 33,670	
North East	6,120	91,100	
Alamo Heights		34,410	
SAISD		220,669	\$7,020
Harlandale	5,340	50,230	
South San		20,670	

Salaries Paid Counselors (1967-68)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood	\$6,662	\$ 48,268	
North East	8,278	123,248	
Alamo Heights		70,383	
SAISD		301,865	
Harlandale		69,250	
Northside		84,841	
South San		33,196	

Salaries Paid Counselors (1968-69)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood		\$ 38,910	
North East		191,033	
Alamo Heights		45,866	
SAISD		271,965	
Harlandale		62,090	
Northside		86,145	
South San	\$7,790	26,327	\$7,870

Average Salariees Paid Counselors (1966-67)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood	\$5,640	\$ 6,734	
North East	6,120	6,507	
Alamo Heights		7,882	
SAISD		7,609	\$7,020
Harlandale		7,964	
Northside	5,340	6,278	
South San		6,890	

Average Salaries Paid Counselors (1967-68)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood	\$6,662	\$ 8,044	
North East	8,278	8,216	
Alamo Heights		8,797	
SAISD		9,147	
Harlandale		7,694	
Northside		8,484	
South San		8,299	

Average Salaries Paid Counselors (1968-69)

School District	Bachelor's Degree	Master's Degree	Doctorate Degree
Edgewood		\$ 7,782	
North East		8,683	
Alamo Heights		9,173	

SAISD		9,378
Harlandale		7,761
Northside		9,571
South San	\$7,790	8,775 \$7,870

(i) The average daily class attendance in each district.

ANSWER: Column V-I of Exhibits 9-a, b, c, and d gives the percentage of attendance for each district for the four years, 1966-67, 1967-68, and 1968-69. Average daily class attendance is obtained by dividing the membership by the average daily attendance. Figures are as follows:

**Average Daily Class Attendance
(Exhibits 9-a, b, c, and d)**

School District	1966-67	1967-68	1968-69
Edgewood	92.84%	91.72%	92.88%
North East	94.96	94.76	94.67
Alamo Heights	94.52	93.82	93.77
SAISD	92.35	91.63	91.15
Harlandale	93.45	92.88	92.33
Northside	94.93	94.46	94.27
South San	93.67	93.82	93.28

(j) The average class size.

ANSWER: Not available.

(k) The number and percentage of students who graduate from high school.

ANSWER: See Exhibit No. 11. Table is as follows:

**The Number and Percent of Students Who
Graduate from High School
(1968-69)**

School District	12th Grade Enrollment	Graduates	Percent Graduates are of Enrollment
Edgewood	950	945	99.47

North East	1,832	1,751	95.58
Alamo Heights	444	437	98.42
SAISD	5,077	4,636	92.31
Harlandale	868	752	86.63
Northside	760	709	93.29
South San	246	231	93.90

- (l) The numbers and grades in which drop-outs occur.

ANSWER: Not available.

- (m) The percentage of students from each school district that attend college.

ANSWER: Not available.

- (n) The percentage of students from each school district that graduate from college.

ANSWER: Not available.

VIII. This series of interrogatories relates to the courses offered in each school district. Please provide:

- (a) The grade school curriculum provided.

ANSWER: Data not available.

- (b) The junior high school curriculum provided.

ANSWER: Data not available.

- (c) The high school curriculum provided.

ANSWER: Data not available.

- (d) A list of the schools that have split shifts or other unusual class hours, giving such unusual class hours.

ANSWER: Data not available.

- (e) The number of students taking each course with a breakdown of:

1. Percentage with Spanish surnames and/or Mexican-Americans

2. Percentage of Negro

3. Percentage of Anglo

ANSWER: Data not available.

(f) The special education courses provided for students of advanced ability, for slow learners, and for handicapped students, giving a breakdown of what courses are provided in each school.

ANSWER: Exhibits 12-a, b, c, d, e furnish special education unit allotments by type for each district having a special education program for the five years 1965-66—1969-70 inclusive.

Blind/Partially Blind
(Exhibits 12-a, b, c, d, and e)

School District	No. of Blind Pupils	No. of Teachers	No. of Partially Sighted Pupils	No. of Teachers
Edgewood				
1965-66	0	0	0	0
1966-67	0	0	0	0
1967-68	0	0	0	0
1968-69	0	0	0	0
1969-70	0	0	0	0
North East				
1965-66	0	0	0	0
1966-67	19	2	8	1
1967-68	14	2	12	1
1968-69	15	2	11	1
1969-70	19	2	8	1
Alamo Heights				
1965-66	0	0	0	0
1966-67	0	0	0	0
1967-68	0	0	0	0

1968-69	0	0	0	0
1969-70	0	0	0	0
SAISD				
1965-66	0	0	0	0
1966-67	14	2	13	1
1967-68	0	0	0	0
1968-69	0	0	0	0
1969-70	0	0	0	0
Harlandale				
1965-66	0	0	14	1
1966-67	0	0	14	1
1967-68	0	0	24	2
1968-69	0	0	0	0
1969-70	0	0	0	0
Northside				
1965-66	0	0	0	0
1966-67	0	0	0	0
1967-68	0	0	0	0
1968-69	0	0	0	0
1969-70	0	0	0	0
South San				
1965-66	0	0	0	0
1966-67	0	0	0	0
1967-68	0	0	0	0
1968-69	0	0	0	0
1969-70	0	0	0	0

**Minimally Brain Injured/School Room
(Exhibits 12-a, b, c, d, and e)**

School District	No. of Minimally Brain Injured Pupils	No. of Teachers	No. of School Room Pupils	No. of Teachers
Edgewood				
1965-66	0	0	0	0
1966-67	0	0	0	0
1967-68	0	0	0	0
1968-69	10	1	0	0

	1969-70	14	2	0	0
North East					
1965-66	246	25	17	2	
1966-67	254	26	18	2	
1967-68	284	29	28	3	
1968-69	329	33	29	3	
1969-70	400	39	31	3	
Alamo Heights					
1965-66	37	4	0	0	
1966-67	66	7	0	0	
1967-68	94	9	0	0	
1968-69	116	12	0	0	
1969-70	116	12	0	0	
SAISD					
1965-66	80	8	0	0	
1966-67	118	12	136	9	
1967-68	135	14	136	8	
1968-69	140	14	156	8	
1969-70	185	18	112	8	

IX. This series of interrogatories relates to the books provided in each school district. Please provide:

(a) As to library books:

1. The average age of each book.
2. Any data you may have relating to the quality of each book.
3. The number of book titles and the number of books, giving the number of students broken down into each school.
4. The dollar amount spent on books.
5. The dollar amount per student spent on books.

ANSWER to (a) 1, 2, 3, 4 and 5: Data are not available to furnish the answers to the questions listed. Reports to this Agency combine Library and Audio-Visual materials expenditures.

(b) As to students' books:

1. How the books are selected:

ANSWER: The chairman of the State Board of Education gives public notice six months in advance of the meeting in which the adoption of new texts is made. New adoptions are made under the Textbook Law or when a contract expires. Interested publishers may secure complete information from the Textbook Division. The date for annual adoptions is the second Monday in November, however the State Board may choose another date.

Procedurally, the State Board of Education selects 15 persons from a list recommended by the State Commissioner of Education to serve on the State Textbook Committee.

Each person shall be an experienced and active education and a majority of the members shall be classroom teachers.

The State Textbook Committee recommends to the commission of Education a complete list of approved textbooks for the various grade levels and subjects. The Commissioner may remove books from the recommended list, however, he cannot add any book to the list. Also he cannot reduce the list to a single adoption.

The Commissioner then submits the list as amended to the State Board of Education which may also remove but not add any books. Contracts awarded by the State may be from 1 to 6 years.

A committee of teachers from each district appointed for one (1) year may then choose the textbooks to be used in their local district. This local committee chooses from the approved list of textbooks. After their selection is made, this local committee submits a report

which dictates their choice to the Textbook Committee. This report is final and not subject to change. Texts selected are to be used for the entire contract period and cannot be changed during that period.

2. The average age of the books in use.

ANSWER: Article 2842 states among other things "The contracts for the total number of different texts adopted shall be so arranged that contracts on not more than one-sixth of the total number of different basal subjects shall expire in any one year, or shall be changed in any one year." This statement, along with the readoption provisions of the same article, gives the State Board latitude in determining length of adoptions and readoption contracts. The average age of textbooks under current contract is about 3½ years.

3. The copyright date of the books in use.

ANSWER: Copyright of each textbook under contract can be found in Bulletin 681, Current Adoption Textbooks 1969-70. Generally, copyrights of texts in science, mathematics, language arts, and social studies carry recent copyrights. Band and orchestra, vocal music, and art carry older copyrights. The range of copyrights in band and orchestra is from 1943 to 1963, while the range in science for grades 1 thru high school (with the exception of physics) is 1963 through 1968.

(No figures by district)

4. The number of books in use.

ANSWER: Column IX(B) 4 of Exhibit 13-a (computer printout shows total number of State owned textbooks in each school district as of December 1, 1969.)

Figures are as follows:

**The Number of State-Owned Textbooks in Use
by District (1969)
(Exhibit 13-a)**

School District	Number of Books
Edgewood	319,757
North East	360,808
Alamo Heights	64,405
SAISD	958,496
Harlandale	241,660
Northside	257,589
South San	115,623

**Total Number of State-Owned Books, Total Cost,
and Average Cost Per Book (1969)**

Total Number of State-Owned Books	Total Cost	Average Cost Per Book
33,613,080	\$83,804,063	\$2.49

5. The dollar amount spent on books, further broken down into the amount per student spent on books.

ANSWER: Column IV(B) 5 of the computer printout shows total amount of state funds spent by district for state-owned textbooks on hand as of December 1, 1969. Page two of Exhibit 13-a shows average amount spent per student for textbooks for each of the four years, 1965-55 through 1968-69 inclusive. Figures are as follows:

Dollar Amount Spent on Books by District (1969)

School District	Total \$ Amount	Dollar Amount Per Student
Edgewood	\$ 754,928.73	
North East	896,448.84	
Alamo Heights	159,472.18	
SAISD	2,294,151.46	
Harlandale	554,417.29	
Northside	615,930.59	
South San	266,244.28	

NOTE: (No figures were supplied as to dollar amount per student spent by the state for use of books. Also, no figures for enrollment were provided for the year 1969 making it impossible to compute the dollar amount per student.)

The following tabulation indicates by year from 1965-66 through 1968-69 the total amount of money spent for textbooks, total enrollment, and cost per child enrolled.

Year	Total Spent	Total Enrollment	Amount Spent Per Scholastic
1965-66	\$16,477,446	2,423,819	\$6.79
1966-67	16,301,991	2,464,682	6.61
1967-68	15,961,258	2,612,000	6.11
1968-69	17,027,870	2,667,000	6.38

X. This series of interrogatories relates to services provided by each school district.

Please provide:

- (a) The number of registered nurses employed full-time by each school district.

ANSWER: Exhibits 7-a, b, c, and d show the number of registered nurses employed by each school for the four years, 1965-66, 1966-67, 1967-68, and 1968-69. Figures are as follows:

**Number of Registered Nurses Employed Full-Time
(Exhibits 7-a, b, c, and d)**

School District	1965-66	1966-67	1967-68	1968-69	Totals
Edgewood	5	8	10	7	30
North East	6	6	7	8	27
Alamo Heights	2	2	2	2	8
SAISD	21	46	50	50	167
Harlandale	3	2	3	3	11

Northside	1	1	1	1	4
South San	1	2	2	3	8

(b) The number of registered nurses employed part-time by each district, broken down into the number of hours of work.

ANSWER: Not available.

(c) The availability of doctors for the students.

ANSWER: Not available.

(d) The availability of dentists for the students.

ANSWER: Not available.

(e) A description of infirmary facilities provided.

ANSWER: Not available.

(f) Whether or not free lunch facilities are provided.

ANSWER: Exhibit 14-b lists total lunches served by school districts participating in the National School Lunch Program for October, 1969. The second column of the Exhibit furnishes the number of lunches served free or at reduced prices to pupils.

**Total Number of Lunches and Free Lunches
(October 1969)
(Exhibit 14-b)**

School District	Total No. of Lunches Served	Number of Free or Reduced Lunches
Edgewood	175,362	27,478
North East	277,725	3,516
Alamo Heights	4,977	1,070
SAISD	no figures	no figures
Harlandale	142,130	20,624
Northside	211,850	19,464
South San	57,386	13,565

(g) Whether or not free milk is provided.

ANSWER: Exhibit 14-a lists the school districts for 1969-70 and the number of school campuses in each participating in the Special Milk Program. This program provides a maximum reimbursement to districts of four (4) cents per half pint of milk purchased in order that the milk may be sold more cheaply to pupils and/or given to needy children. United States Department of Agriculture regulations do not require that the actual number of half pints of milk given to children be reported.

**Districts and No. of Schools Participating in
Special Milk Program**

School District	Number of Schools
Edgewood	24
North East	28
Alamo Heights	6
SAISD	102
Harlandale	20
Northside	27
South San	9

(h) Please list any other services available.

ANSWER: Not available.

XII. The series of interrogatories relates to special equipment provided for education.

Please provide:

(a) What visual aid is provided in each school, its value, and average age.

ANSWER: Not available.

(b) What television equipment is provided in each school, its value, and average age.

ANSWER: Not available.

(c) What recording equipment is provided in each school, its value, and average age.

ANSWER: Not available.

(d) What computer equipment is provided in each school, its value, and average age.

ANSWER: Not available.

(e) What other special equipment is provided in each school, giving use, dollar value, and average age.

ANSWER: Not available.

XIII. This series of interrogatories relates to extra-curricular activities and facilities available in each school district. Please provide:

(a) A description of the music facilities and activities in each school.

ANSWER: Not available.

(b) A description of the drama facilities and activities in each school.

ANSWER: Not available.

(c) A description of the art facilities and activities in each school.

ANSWER: Not available.

(d) A description of any other extra-curricular cultural or educational activities provided by each school.

ANSWER: Not available.

XIV. This series of interrogatories relates to the hours of education provided in each school district. Please provide:

(a) The hours of extra-curricular activity as described in interrogatory XIII above.

ANSWER: Data not available.

(b) The hours of classes in each school and a description of the split shifts or any other unusual class hours.

ANSWER: Data not available.

Number and Percent of Anglo-American, Spanish Surname,
and Negro Students in Each School and in Each District

(Exhibit 10)
(d), (e) and (f)

School District and Campus		(f)		(e)		(d)		Total Number of Students
		No. of Anglo- Ameri- can Students	%	No. of Negro Students	%	No. of Mexican- Ameri- can Students	%	
Edgewood	001	43	2.19	164	8.35	1,755	89.44	1,962
	002	75	3.96	67	3.53	1,749	92.39	1,893
	003	11	.91	29	2.42	1,152	96.24	1,197
	041	56	10.54	20	3.76	455	85.68	531
	042	3	.34	0	0.00	859	99.65	862
	043	2	.16	3	.24	1,205	99.58	1,210
	044	0	.00	283	60.47	185	39.52	468
	045	27	2.55	16	1.51	1,014	95.93	1,057
	101	56	7.90	3	.42	649	91.66	708
	102	0	.00	1	.15	638	99.84	639
	103	1	.44	0	.00	222	99.55	223
	105	3	.37	1	.12	786	99.49	790
	106	7	.69	0	.00	999	99.30	1,006
	107	20	1.90	0	.00	1,031	98.09	1,051
	108	9	.72	8	.64	1,223	98.62	1,240
	109	0	.00	276	66.50	139	33.49	415
	110	6	.70	7	.82	837	98.47	850
	111	2	.45	238	53.72	203	45.82	443
	112	45	3.47	5	.38	1,246	96.14	1,296
	113	1	.15	0	.00	662	99.84	663
	114	15	1.32	11	.97	1,100	97.43	1,129
	115	10	1.56	0	.00	630	98.43	640
	116	466	55.01	183	21.60	174	20.54	847
	117	5	1.59	82	26.19	226	72.20	313
	184	0	.00	3	.38	785	99.61	788
Edgewood	District Totals	863	3.88	1,400	6.30	19,924	89.66	22,221

North	001	2,257	91.00	0	.00	207	8.34	1,992
East	002	1,922	96.48	1	.05	65	3.26	2,239
	004	1,767	89.60	2	.10	191	9.68	1,972
	041	971	96.32	0	.00	35	3.47	1,008
	042	984	96.94	0	.00	31	3.05	1,015
	043	1,077	92.44	7	.60	75	6.43	1,165
	044	1,091	90.91	0	.00	107	8.91	1,200
	101	403	94.15	0	.00	25	5.84	428
	102	618	95.37	0	.00	29	4.47	648
	103	653	91.84	0	.00	55	7.73	711
	104	590	87.40	1	.14	84	12.44	675
	105	712	88.55	4	.49	73	9.07	804
	106	915	93.27	1	.10	65	6.62	981
	107	539	91.20	1	.16	50	8.46	591
	108	489	96.83	0	.00	15	2.97	505
	109	403	93.50	0	.00	19	4.40	431
	110	470	97.30	0	.00	12	2.48	483
	111	665	81.19	0	.00	149	18.19	819
	112	707	90.29	0	.00	71	9.06	783
	113	598	85.06	0	.00	104	14.79	703
	114	652	89.31	1	.13	69	9.45	730
	115	554	81.23	0	.00	124	18.18	682
	116	671	93.71	5	.69	38	5.30	716
	117	542	97.30	0	.00	11	1.97	557
	118	514	88.16	3	.51	45	7.71	583
	119	269	72.11	0	.00	104	27.88	373
	120	465	93.37	0	.00	30	6.02	498
North East								
District Totals		23,708	91.99	26	.10	1,903	7.38	25,772
Alamo	001	1,729	91.87	5	.26	143	7.59	1,882
Heights	041	760	85.58	2	.22	125	14.07	888
	101	765	95.62	10	1.25	24	3.00	800
	102	347	67.64	0	.00	163	31.77	513
	103	247	51.89	0	.00	253	47.91	528
	104	524	94.41	5	.90	23	4.14	555

Alamo Heights

Totals	4,339	85.15	22	.42	731	14.15	5,166	
SAISD	001	99	4.78	628	30.35	1,339	64.71	2,069
	002	308	13.03	0	.00	2,052	86.87	2,362
	003	1,019	66.04	43	2.78	470	30.46	1,543
	004	9	.38	43	1.82	2,306	97.79	2,358
	005	1,891	71.22	313	11.78	447	16.83	2,655
	006	817	65.56	292	23.43	131	10.51	1,246
	008	42	1.79	4	.17	2,293	98.03	2,339
	009	0	.00	806	99.75	2	.24	808
	041	840	79.92	2	.19	208	19.79	1,051
	042	1	.07	5	.39	1,268	99.52	1,274
	043	500	61.05	174	21.24	143	17.46	819
	044	0	.00	363	99.45	2	.54	365
	045	0	.00	199	97.54	5	2.45	204
	046	18	2.35	548	71.72	198	25.91	764
	047	35	4.24	1	.12	786	95.27	825
	048	172	29.75	45	7.78	358	61.93	578
	049	37	2.45	71	4.70	1,397	92.57	1,509
	050	796	65.83	2	.16	411	33.99	1,209
	051	275	26.26	24	2.29	746	71.25	1,047
	052	346	36.07	32	3.33	572	59.64	959
	053	216	22.47	19	1.97	726	75.54	961
	054	34	3.97	508	59.41	310	36.25	855
	055	4	.34	5	.42	1,154	99.22	1,163
	056	0	.00	507	99.02	5	.97	512
	057	935	82.67	6	.53	187	16.53	1,131
	058	329	34.63	48	5.05	570	60.00	950
	059	687	67.68	1	.09	325	32.01	1,015
	060	437	59.05	210	28.37	84	11.35	740
	101	295	78.87	0	.00	77	20.58	374
	102	49	13.10	7	1.87	311	83.15	374
	103	368	70.36	1	.19	152	29.06	523
	104	11	1.55	0	.00	698	98.44	709
	105	395	81.44	0	.00	84	17.13	485
	106	85	18.24	16	3.43	363	77.89	466

107	1,649	47.14	121	3.45	1,679	47.99	3,498
108	30	3.59	21	2.51	780	93.52	834
110	5	.41	16	1.33	1,179	98.25	1,200
111	0	.00	9	.93	956	99.06	965
112	27	4.47	0	.00	575	95.19	604
113	54	7.71	153	21.85	493	70.42	700
114	0	.00	201	99.01	2	.98	203
115	34	4.14	0	.00	787	95.85	821
116	94	10.03	0	.00	841	89.75	937
117	141	29.80	2	.42	330	69.76	473
118	38	3.59	0	.00	1,019	96.40	1,057
119	0	.00	501	99.60	2	.39	503
120	182	84.65	20	9.30	13	6.04	215
121	14	2.02	0	.00	678	97.97	692
122	2	.45	316	71.81	122	22.72	440
123	57	13.47	5	1.18	361	85.34	423
124	245	63.47	12	3.10	127	32.90	386
125	499	77.12	17	2.62	131	20.24	647
126	247	59.80	1	.24	164	39.70	413
127	0	.00	1,009	97.58	25	2.41	1,034
128	28	26.41	0	.00	76	71.69	106
129	342	16.73	2	.09	1,696	82.97	2,044
130	0	.00	469	97.10	14	2.89	483
131	56	23.62	2	.84	179	75.52	237
132	13	3.15	147	35.67	249	60.43	412
133	0	.00	63	24.80	191	75.19	254
134	741	92.85	4	.50	52	6.51	798
135	227	36.49	24	3.85	364	58.52	622
136	72	8.53	0	.00	768	90.99	844
137	599	84.36	0	.00	107	15.07	710
138	15	4.34	1	.28	329	95.36	345
139	163	24.77	3	.45	490	74.46	658
140	13	1.96	0	.00	650	98.03	663
141	54	30.00	15	8.33	111	61.66	180
142	22	3.36	0	.00	631	96.63	653
143	98	19.36	5	.98	403	79.64	506

144	54	5.07	8	.75	1,000	93.98	1,064
145	9	3.47	0	.00	250	96.52	259
146	154	64.97	3	1.26	79	33.23	237
147	54	8.23	217	33.07	385	58.68	656
148	293	43.99	1	.15	372	55.85	666
149	15	2.31	8	1.23	624	96.29	648
150	351	69.09	0	.00	152	29.92	508
151	26	21.31	1	.81	95	77.86	122
152	89	27.13	4	1.21	234	71.34	328
153	0	.00	810	95.27	34	4.02	844
154	25	5.47	8	1.75	424	92.77	457
155	235	53.28	0	.00	205	46.48	441
156	11	2.33	206	43.73	254	53.92	471
157	63	5.86	18	1.67	994	92.46	1,075
158	35	4.68	453	60.64	258	34.53	747
159	257	74.92	9	2.62	65	18.95	343
160	137	27.02	0	.00	370	72.97	507
161	251	54.09	0	.00	212	45.68	464
162	10	1.54	0	.00	636	98.45	646
164	936	86.34	1	.09	147	13.56	1,084
165	22	2.48	400	45.19	463	52.31	885
166	0	.00	22	17.46	104	82.53	126
167	241	64.78	0	.00	131	35.21	372
168	154	20.05	211	27.47	398	51.82	768
169	37	3.42	1	.09	1,043	96.48	1,081
170	178	36.77	7	1.44	294	60.74	484
171	0	.00	432	97.07	13	2.92	445
172	0	.00	746	99.73	2	.26	748
173	533	78.61	7	1.03	132	19.46	678
174	163	38.44	0	.00	261	61.55	424
175	160	26.53	0	.00	441	73.13	603
176	168	44.56	2	.53	205	54.37	377

SAISD

Totals	21,472	26.71	11,637	14.48	47,031	58.52	80,360
Harlandale	001	523	28.56	1	.05	1,307	71.38
	002	1,224	67.17	0	.00	598	32.82

041	688	36.10	2	.10	1,180	63.78	1,850
042	36	2.89	1	.08	1,206	97.02	1,243
043	607	63.49	0	.00	347	36.29	956
044	255	66.23	0	.00	130	33.76	385
101	265	53.64	0	.00	227	45.95	494
102	685	78.01	2	.22	191	21.75	878
103	42	5.57	4	.53	708	93.89	754
104	34	3.31	0	.00	993	96.68	1,027
105	23	4.56	0	.00	481	95.43	504
106	169	25.18	1	.14	501	74.66	671
107	368	61.84	0	.00	227	38.15	595
108	604	60.64	0	.00	392	39.35	996
109	163	26.12	0	.00	460	73.71	624
110	212	30.02	0	.00	494	69.97	706
111	376	80.68	0	.00	90	19.31	466
112	35	4.48	0	.00	746	95.51	781
113	197	33.33	0	.00	394	66.66	591
114	372	59.04	7	1.11	251	39.84	630
115	36	36.73	0	.00	62	63.26	98
Harlandale							
Totals	6,894	38.50	18	.10	10,985	61.36	17,902
North-side							
000	6	9.83	5	8.19	50	81.96	61
001	820	79.53	19	1.84	189	18.33	1,031
002	1,573	88.56	26	1.46	171	9.62	1,776
003	1,279	92.14	2	.14	104	7.49	1,388
041	1,004	93.13	1	.09	70	6.49	1,078
042	638	87.51	26	3.56	63	8.64	729
043	820	71.99	35	3.07	282	24.75	1,139
101	364	47.21	20	2.59	387	50.19	771
102	559	83.68	22	3.29	75	11.22	668
103	373	91.87	3	.73	29	7.14	406
104	242	80.93	0	.00	57	19.96	299
105	751	83.25	8	.88	126	13.96	902
106	708	88.72	28	3.50	60	7.51	798
107	45	68.18	1	1.51	20	30.30	66
108	358	83.84	3	.70	66	15.45	427

109	394	85.46	0	.00	64	13.88	461
110	32	58.18	2	3.63	21	38.18	55
111	364	79.82	0	.00	88	19.29	456
112	434	71.97	8	1.32	161	26.69	603
113	553	90.35	16	2.61	42	6.86	612
114	805	79.07	35	3.43	171	16.79	1,018
115	712	93.19	0	.00	52	6.80	764
116	11	100.00	0	.00	0	.00	11
117	287	53.74	21	3.93	224	41.94	534
119	339	94.16	1	.27	20	5.55	360
Northside							
Totals	13,471	82.07	282	1.71	2,592	15.79	16,413

XV. This series of interrogatories relates to achievement of the children of various school districts based on testing. Please provide:

(a) Tests relating to achievement given to students in each school.

ANSWER: Data not available.

(b) The results of those tests.

ANSWER: Data not available.

Those districts participating on a voluntary basis in the N.D.E.A. Title V State Testing Program for grades 7 and 9 are not required to report results to this Agency.

(c) What testing is objective and what testing is subjective.

ANSWER: Data not available.

(d) Whether or not instruction is provided to assist students in taking tests which qualify the student for college entrance.

ANSWER: Data not available.

XVI. This series of interrogatories relates only to school districts that are in part, within the City of San Antonio and/or Bexar County, Texas. Such schools are: Alamo Heights Independent School District, Boerne Independent School District, Comal Independent School District, East Central Independent School District, Edgewood Independent School District, Floresville Independent School District, Harlandale Independent School District, Judson Independent School District, Medina Valley Independent School District, North East Independent School District, Northside Independent School District, San Antonio Independent School District, Schertz-Cibolo Universal City Independent School District, Somerset Independent School District. Please provide:

- (a) The number of students in each district that reside in Bexar County, Texas.

ANSWER: See Exhibit 15—Reported totals are scholastic, not students. Data on residence of students enrolled not available. Figures are at follows:

Exhibit 15
Number of Scholastics Residing in Bexar County

District	1965-66	1966-67	1967-68	1968-69	1969-70
Alamo Heights	6230	6017	6052	5870	5540
Boerne	35	29	30	31	29
Comal	62	68	67	76	92
East Central	2642	2740	3025	3042	3354
Edgewood	22108	22730	22830	24158	24464
Floresville	0	0	0	0	0
Harlandale	17618	17757	18210	18361	18846
Judson	1151	1329	1509	1993	2578
Medina Valley	205	225	235	223	328
Northeast	25596	24495	25664	27193	28340
Northside	11551	13103	15100	17133	19122
San Antonio	91906	90837	89922	88989	87158

Schertz-Cibolo	1453	1888	1996	2106	2063
Somerset	529	535	571	643	658

(b) The number of students outside Bexar County, Texas.

ANSWER: See Exhibit 15—(again, scholastics not students enrolled). Figures are as follows:

Exhibit 15
Number of Scholastics Residing Outside of
Bexar County

District	1965-66	1966-67	1967-68	1968-69	1969-70
Alamo Heights	0	0	0	0	0
Boerne	928	921	911	908	973
Comal	1427	1463	1465	1563	1614
East Central	0	0	0	0	0
Edgewood	0	0	0	0	0
Floresville	1796	1801	1822	1895	1915
Harlandale	0	0	0	0	0
Judson	0	0	0	0	0
Medina Valley	1108	1098	1116	1067	1152
Northeast	0	0	0	0	0
Northside	2	1	0	0	0
San Antonio	0	0	0	0	0
Schertz-Cibolo	800	935	1017	1028	1158
Somerset	79	78	69	80	66

[NOTE: South San has been excluded from both (a) and (b)]

(c) A list of the schools, if any, with respect to each such district, located in Bexar County, Texas, and the number of students in each school.

ANSWER: Intent of question not clear. Enrollment as of October, 1968 by school campus (number of campus—not name), for each each district located wholly in Bexar County may be secured from Exhibit No. 10.

(d) The number of students in each such district that reside in San Antonio, Texas.

ANSWER: Data not available.

(e) A list of the schools, if any, with respect to each such district, located in San Antonio, Texas, and the number of students in each school.

ANSWER: Data not available.

(f) With regard to the schools listed in (c) above, please describe which are located in the City of San Antonio, Texas.

ANSWER: Data not available.

(g) If you have a map available of Bexar County, Texas, which provides the location of each school in the County, please attach it to your answers.

ANSWER: Small map showing school districts in Bexar County (Exhibit 16) is included. Map does not show location of school campuses.

(h) If you have a population map available of Bexar County, Texas, which shows the school population density or general population density, please attach it to your answers.

ANSWER: Map not available.

XVII. This series of interrogatories relates only to the independent school districts in Bexar County, Texas. Please provide:

(a) When each was established.

ANSWER: The answer is as follows:

Edgewood C S D #041 was converted to Edgewood I S D #905 by election on 01-21-50.

Alamo Hts. was incorporated by election on 11-24-23.

North East I S D was created from North East R H S D #710 by election on 03-09-55.

S A I S D was created by Twenty-Eighth Legislature, 1903, page 198, effective 07-01-03.

Harlandale was incorporated by election of 01-26-24.

Northside I S D #915 was created from Northside R H S D #715 by election on 06-13-55.

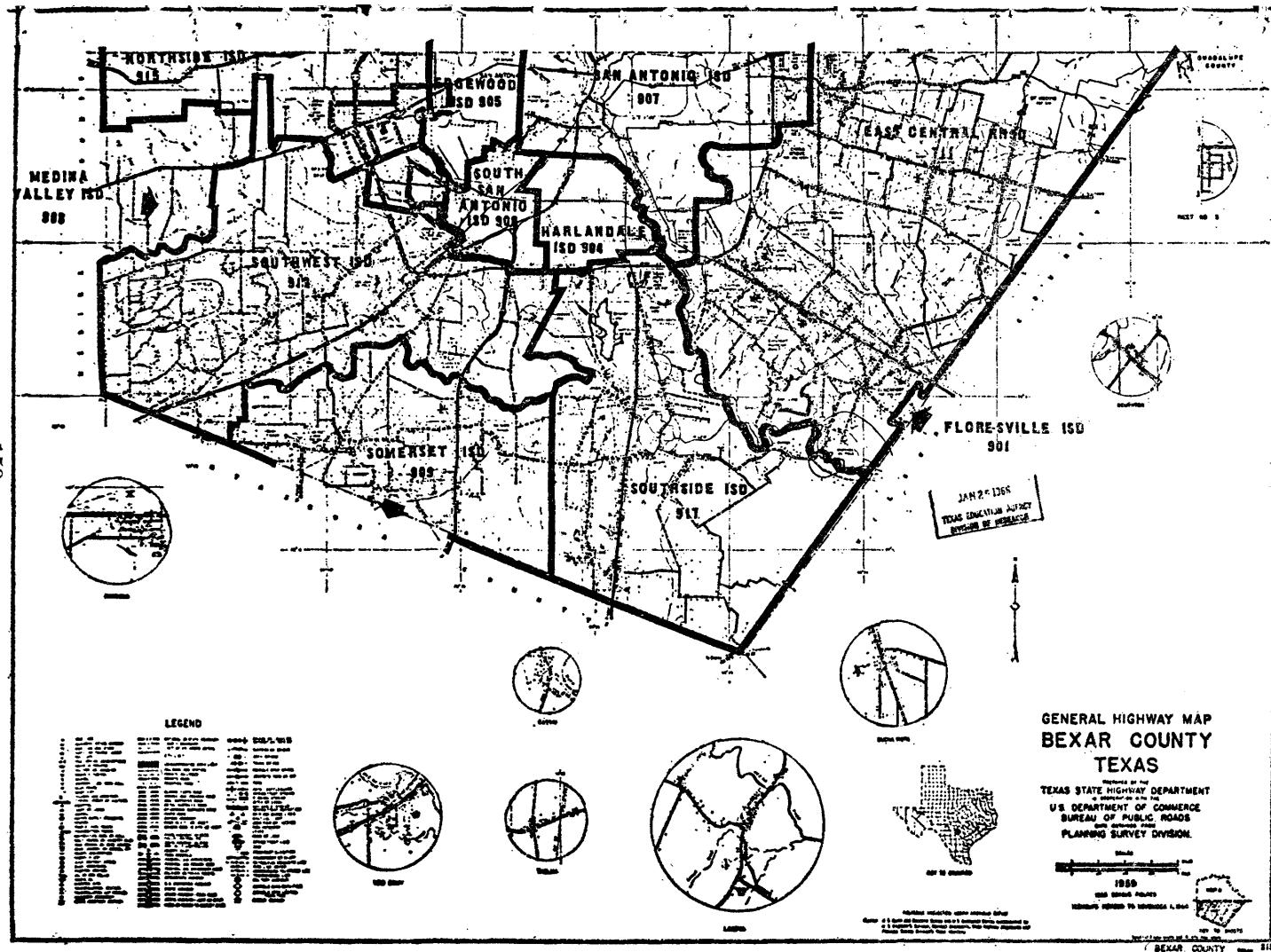
South San (no figures or information available).

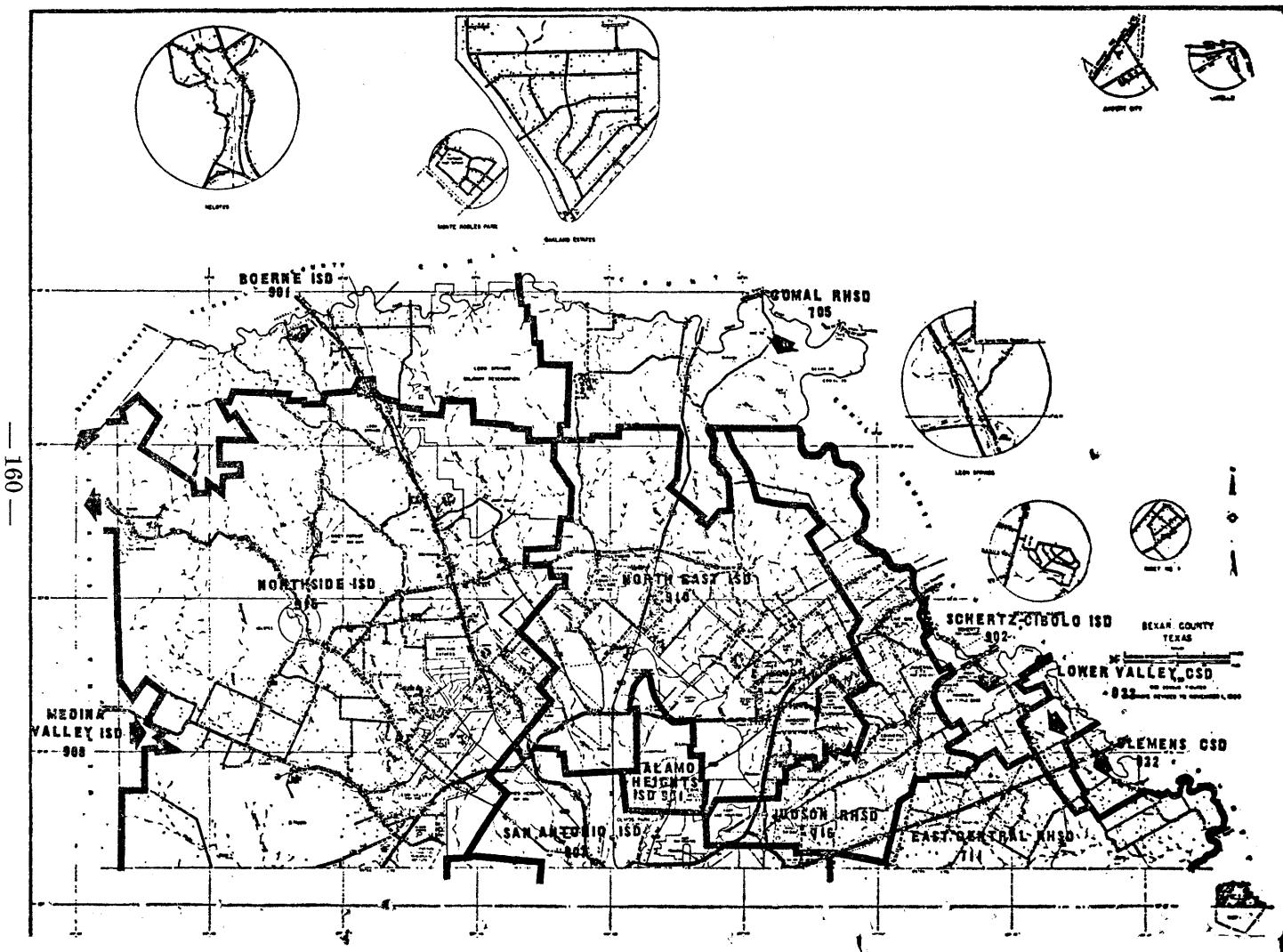
East Central C S D was created on 03-15-49 by consolidation through election.

Judson was created by County Board action of 06-25-58.

Somerset was created by the Third called Session of the Thirty-Sixth Legislature, effective 06-18-20.

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(b) Under what law each was established.

ANSWER: Information available as to the following Districts only:

SAISD — Twenty-Eighth Legislature, 1903, page 198, effective 07-01-03.

Somerset—Third called Session of the Thirty-Sixth Legislature, effective 06-18-20.

Floresville ISD—was created by Regular Session of the Thirty-Eighth Legislature, page 18 of Special Laws, effective 02-07-23.

(c) Under what law each is in existence at the present time.

ANSWER: Information not available.

(d) The history of expansion of the school district boundary lines.

ANSWER: No specific data as to expansion of boundary lines, however, there is information pertaining to consolidation.

(e) The history of expansion of the number of students.

ANSWER: The last page of Exhibit 17 shows pupil enrollment by district for 1950-51, 1955-56, 1960-61, 1965-66, and 1968-69. Table is as follows:

(Exhibit 17)

Enrollment

District	1950	1955	1960	1965	1968
Edgewood	4,607	10,904	15,755	21,838	23,372
Northeast	524	4,465	12,180	21,383	26,707
Alamo Heights	2,304	3,719	4,901	5,299	5,291
SAISD	48,965	64,205	75,282	78,451	80,374
Harlandale	5,778	9,589	12,923	15,935	17,560

Northside	822	1,745	4,484	11,734	17,976
South San			No figures available		
East Central	990	1,278	1,441	2,265	2,926
Judson	—	—	612	1,220	2,442
Somerset	391	407	488	625	788
Boerne	560	736	933	1,028	1,135
Comal County	—	—	1,158	1,537	1,745
Floresville	849	1,387	1,522	1,634	1,836
Medina Valley	—	—	687	885	1,546
Shertz-Cibolo	—	893	1,546	2,842	3,524

(f) The consolidations with other school districts, listing dates of occurrence; with what district or districts it occurred, and the method of consolidation.

ANSWER: Details are as follows:

Edgewood CSD #041 was converted to Edgewood ISD #905 by election on 01-21-50.

North East RHSD was created through consolidation by election on 08-03-49. Blanco Rd. CSD #006, Seay CSD #007, Olmos CSD #009, Lookout Valley CSD #010, Serna CSD #011, Coker CSD #050, and Salado Valley CSD#052 were consolidated to form North East RHSD #710. North East RHSD #710 by election on 03-09-55.

Alamo Heights was incorporated by election on 11-24-23.

SAISD—06-07-49—Los Angeles Heights ISD was annexed to SAISD by County Board action.

03-22-50—W. W. White CSD #015 and Hot Wells CSD #025 were annexed to SAISD by County Board action.

09-19-49—Fort Sam Houston ISD was annexed to SAISD by the State Board of Education.

03-08-52—Annexation of Fort Sam Houston ISD to SAISD was annulled, effective 07-01-52.

Harlandale was incorporated by election on 01-26-24.

Northside—

08-16-50—Leon Springs CSD #001, Helotes ESD #3½; Lock Hill CSD #005 and Leon Valley CSD 5½ were consolidated by election to form Northside RHSD #715 11-09-49—Mackey CSD #015 was consolidated to Northside by election to Northside Rural High School District.

06-13-55—Northside ISD #915 was created from Northside RHSD#715 by election.

South San (No information)

East Central—

03-15-49—Boldtville CSD #020, Sayers CSD #021, Utzville CSD #022.

Boerne—Incorporated by election on 02-28-07.

Comal County—Comal County Rural High School was created in 11-12-56.

Floresville—Floresville was created by Regular Session of the Thirty-Eighth Legislature, page 18 of the Special Laws, effective 02-07-23.

Medina Valley—Medina Valley ISD was formed on 12-10-59.

Schertz-Cibolo—formed by election on 03-07-40.

Boerne ISD—

02-28-07—Incorporated by election.

04-05-47—Upper Cibolo CSD #002 was consolidated with Boerne ISD by election.

07-05-49—Wasp Creek was divided between Sisterdale CSD #005 and Boerne ISD by action of the County Board.

08-31-49—Upper Balcones CSD #045 of Bexar County was consolidated with Boerne ISD by election.

04-10-50—Van Rawb CSD #013 of Bexar County was consolidated with Boerne ISD by election.

06-06-52—Kruezberg CSD #009 was divided between Kendalia RHSD #703 and Boerne ISD by action of the County Board.

08-07-52—A portion of Balcones CSD #001 and a portion of Pleasant Valley CSD #010 were annexed to Boerne ISD by action of the County Board.

08-26-52—A portion of Bulverde RHSD #702 of Comal County was annexed to Boerne by action of the County Board.

01-09-53—A portion of Pleasant Valley CSD #010 was annexed to Boerne by County Board action.

03-22-54—Balcones CSD #001 was consolidated with Boerne ISD by election.

04-08-54—Kendalia RHSD #703 was dissolved and the territory divided between Boerne ISD, Blanco ISD, of Blanco County, Comfort ISD of Kendall County and Sherwood RHSD of Comal County by action of County Board.

06-07-57—Pleasant Valley was consolidated with Boerne ISD by County Board action.

Comal County ISD—

11-12-56—Bulverde RHSD #702, Sherwood RHSD #703, Goodwin RHSD #704, Danville CSD #002, Mountain Valley CSD #003, Solms CSD #012, Davenport CSD #013, and Fischer CSD #014 were grouped to form Comal County Rural High School District #705 by action of County Board.

05-21-68—Comal County Rural High School was converted to Comal ISD by election.

Floresville—

07-17-48—Southland Springs ISD was consolidated with Floresville ISD by election.

05-17-48—Midway CSD #044 was annexed to Floresville ISD by County Board action.

07-27-48—A portion of Floresville ISD was annexed to Stockdale ISD by action of County Board.

06-14-48—A portion of Stockdale ISD was annexed to Floresville by County Board action.

07-30-49—Sunnyside CSD #005, Wehmann CSD #030 and Camp Ranch were consolidated with Floresville by election.

01-09-50—Fairview CSD #001 and Labatt CSD #024 consolidated with Floresville ISD by election.

07-31-50—Ridout CSD #042 was consolidated with Floresville ISD by election.

08-04-50—A portion of Floresville ISD annexed to Poth ISD by County Board action.

07-28-54—Calaveras CSD #003 consolidated with Floresville ISD by election.

11-05-54—Picosa CSD #025 annexed to Floresville ISD by County Board action.

01-28-55—Canada Verdi CSD #006 annexed to Floresville ISD by County Board action.

02-25-55—Graytown CSD #054 annexed to Floresville ISD by County Board action.

02-25-55—A portion of Floresville ISD annexed to Poth ISD by County Board action.

04-03-57—Saspamco ISD annexed to Floresville ISD by County Board action.

Medina Valley ISD—

12-10-59—La Coste ISD and Castroville ISD were consolidated by election to form Medina Valley ISD.

Schertz-Cibolo ISD—

03-07-40—Cibolo CSD #029 was annexed to Schertz CSD #036 by election to form Schertz-Cibolo CSD #029.

03-07-55—Green Valley CSD #030 was annexed to Schertz-Cibolo by County Board action.

04-06-61—Schertz-Cibolo ISD from Schertz-Cibolo CSD #029 by election.

07-27-66—Clemens CSD #032 was divided between Marion ISD and Schertz-Cibolo ISD by County Board action on 07-27-66.

East Central—

Elemendorf CSD #023, Highland CSD #024, and Southton CSD #047 were consolidated by election to form East Central CSD #020.

11-14-49—Goebel CSD #031, China Grove CSD #019, Salatrillo CSD #031, and Hedwig CSD #039 annexed to East Central CSD #020 by election to form East Central RHSD #711.

09-30-66—East Central RHSD #711 converted to East Central ISD by election.

Judson—

06-25-58—Selma CSD #008, Converse CSD #012 and Kirby CSD #049 were grouped to form Judson RHSD #716 by County Board action.

12-16-66—Judson RHSD #716 incorporated for school purposes by election.

Somerset—

(No date)—Somerset CSD #006 Atascosa County was consolidated with Somerset ISD of Bexar County by election.

03-06-50—Oak Island CSD #034 was consolidated Somerset ISD by election.

XVIII. Do you agree that the educational needs of the students in the Edgewood Independent School District are no less than the educational needs of the other students going to free public schools in Bexar County, Texas?

ANSWER: We agree with the statement made in Interrogatory Number XVIII.

XIX. If you, or any of you, take the position that the educational needs of the children in Edgewood In-

dependent School District are less than the educational needs of the school children in the other public schools in Bexar County, Texas, please explain the basis of your answer.

ANSWER: No comment in view of agreement with Statement for Interrogatory Number XVIII.

XX. Do you take the position that costs of goods, materials, supplies, and construction substantially vary between Edgewood Independent School District and the other school districts in Bexar County, Texas?

ANSWER: We doubt that costs of goods, materials and supplies vary substantially between Edgewood Independent School District and the other school districts in Bexar County. Construction costs would be similar for the same type of school building with approximately the same equipment therein.

XXI. If any of you take the position that costs substantially vary in the answer above to Interrogatory Number XX, please explain the basis for such position.

ANSWER: No comment necessary.

XXII. Are the school district and boundaries of the Edgewood Independent School District a product of historical accident rather than any logical plan of development?

ANSWER: No valid information available on which to base a response.

XXIII. If your answer to the preceding Interrogatory Number XXII was "no", please explain the logical reasoning and basis for the present Edgewood Independent School District boundaries.

ANSWER: No comment necessary.

INFORMATION NOT AVAILABLE

Interrogatories I-XV deal with Alamo Heights, Edgewood, Harlandale, South San, SAISD, North East and Northside.

(b) Total market value of taxable property in each district at 100% valuation.

(c) Percentage of market value at which each district's property is assessed. Give both claimed percentage and State's estimate of actual percentage.

Interrogatory #2

(a) The number of people in each district

(c) The number of students in each district going to schools other than district schools.

Interrogatory #III

(a) The average per capita income in each district

(b) The average income of each wage earner in each district

(c) The average number of school-aged children per family in each district.

Interrogatory #IV

(b) The average number of teachers per school in each district.

(c) The student-teacher ratio per grade in each district.

(h) The percent of teachers with provisional certificates of education.

(i) The percent of teachers with permanent certificates of education.

(k) Any other credentials teachers in each school district have that would add to their qualifications.

- (o) The salary expenditure for teachers per student.
- (p) The turnover rate of teachers.

Interrogatory #V

- (b) The number and percentage of drop-outs per year in each school district.
- (c) The number of withdrawals per year in each district.
- (g) The percentage of students in special education with the breakdown of the categories of special education.
- (h) The percentage of first graders who speak only Spanish.
- (j) The average class size.
- (l) The numbers and grades in which drop-outs occur.
- (m) The percentage of students from each school district that attend college.
- (n) The percentage of students from each school district that graduate from college.

Interrogatory #VI

- (a) The average age of the physical facilities in the district.
- (b) The type of construction of the physical facilities in the district.
- (c) The condition of the physical facilities in the district.
- (d) The average number of students per class.
- (e) The type of heating or air-conditioning system in the schools.

- (f) The number of temporary structures.
- (g) The land area that is used for school programs.
- (h) The gymnasium space.
- (i) The laboratory space.
- (j) The number of substandard or dilapidated buildings.

Interrogatory #VII

- (a) The background qualifications and educational qualifications of each principal.
- (b) The number of vice-principals in each school and each district and their qualifications and backgrounds.

Interrogatory #VIII

- (a) The grade school curriculum provided.
- (b) The junior high school curriculum provided.
- (c) The high school curriculum provided.
- (d) A list of the schools that have split shifts or other unusual class hours.
- (e) The number of students taking each course with a breakdown of:
 1. percentage of Spanish surnames and/or Mexican Americans
 2. percentage of Negro
 3. percentage of Anglo

Interrogatory #IX

- (a) As to library books:
 1. The average age of each book
 2. Any data you may have relating to the quality of each book

3. The number of book titles and the number of books, giving the number of students broken down into each school

4. The dollar amount spent on books

5. The dollar amount per student spent on books. The dollar amount spent on books, further broken down into the amount per student spent on books (Amounts by district)

(b) The number of registered nurses employed part-time by each district, broken down into the number of hours of work

(c) The availability of doctors for the students

(d) The availability of dentists for the students

(e) A description of any infirmary facilities provided

(h) Please list any other services available.

Interrogatory #XI

(a) A description of the laboratory equipment provided in each school

(b) The dollar value of the laboratory equipment provided in each school

(c) The dollar cost of supplies consumed in each school and a description of these supplies

(d) A description of the physical plant in which laboratory facilities are contained and the dollar value of such plant.

Interrogatory #XII

(a) What visual aid is provided in each school, its value, and average age

(b) What television equipment is provided in each school, its value, and average age.

(c) What recording equipment is provided in each school, its value, and average age.

(d) What computer equipment is provided in each school, its value, and average age.

(e) What other special equipment is provided in each school giving use, dollar value, and average age.

Interrogatory #XIII

(a) A description of the music facilities and activities in each school

(b) A description of the drama facilities and activities in each school

(c) A description of the art facilities and activities in each school

(d) A description of any other extra-curricular cultural or educational activities provided by each school.

Interrogatory #XIV

(a) The hours of extra-curricular activity as described in Interrogatory XIII above.

(b) The hours of classes in each school and a description of the split shifts or any other unusual class hours.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DEMETRIO P. RODRIGUEZ, ET AL

vs.

SAN ANTONIO INDEPENDENT
SCHOOL DISTRICT, ET AL

CIVIL ACTION NO. 68-175-SA

ANSWERS TO INTERROGATORIES

I. Please supply any information on the interrogatories formally propounded to you that were not answered at such time, but of which you have answers to at the present time.

ANSWER: No information is available to answer interrogatories not previously answered in the other set of interrogatories.

II. Please add any supplemental, new, or changed information relative to any of the interrogatories you answered heretofore in this cause, supplying information available to you since the time of answering said interrogatories.

ANSWER: The Texas Education Agency has attempted to bring up to date to the extent possible interrogatories previously answered. See attached memorandum from Jerry T. Barton addressed to Leon R. Graham and computer printout exhibits. All computer printout exhibits can be related to interrogatories of November, 1969. Procedure for identifying school districts by county district number of such printout exhibits was included in previous response to interrogatories. The appropriate numbers related to interrogatories dated November 12, 1969 and the respective supplemental, new, or changed information is as follows:

(Set 1—I. Series of interrogatories relating to school funds provided each school district)

(d) The tax rate of each district

1968-69
(Exhibit 1-a)

School District	Maintenance (D-M)	Bond	Bond Rate (D-B)
Edgewood	.50		.90
North East	1.02		.48
Alamo Heights	1.25		.36
SAISD	1.25		.36
Harlandale	1.06		.41
Northside	.82		.68
South San	.90		.50

1969-70
(Exhibit 1-b)

School District	Maintenance (D-M)	Bond	Bond Rate (D-B)
Edgewood	.55		.95
North East	1.10		.40
Alamo Heights	1.40		.35
SAISD	1.38		.36
Harlandale	.99		.48
Northside	.82		.68
South San	1.00		.50

PLAINTIFFS' EXHIBIT XII

(Set 1—I. Series of interrogatories relating to school funds provided each school district)

(e) Amount of tax income each district receives from its ad valorem taxes.

1968-69 (Exhibit 1-d)

School District	Maintenance Dollars (E-M)	Bond Dollars (E-B)
Edgewood	227,000	374,320
North East	3,976,222	1,870,736

Alamo Heights	1,514,762	435,996
SAISD	8,771,043	2,554,536
Harlandale	855,605	342,750
Northside	1,314,011	1,068,992
South San	457,825	254,410

1969-70 (Exhibit 1-e)

School District	Maintenance Dollars (E-M)	Bond Dollars (E-B)
Edgewood	324,643	549,253
North East	4,907,882	1,794,827
Alamo Heights	1,723,815	430,954
SAISD	10,004,017	2,627,763
Harlandale	1,014,751	489,693
Northside	1,603,485	1,328,233
South San	568,052	283,985

(f) Amount of funds received by each district under the Minimum Foundation Program.

1968-69 (Exhibit 1-d)

School District	Per Capita Dollars (F-PC)	Other Dollars in Minimum Foundation (MFP)
Edgewood	2,476,420	2,685,658
North East	2,785,421	3,327,263
Alamo Heights	606,409	573,338
SAISD	9,137,589	8,227,147
Harlandale	1,882,321	2,428,426
Northside	1,754,699	2,548,330
South San	802,664	1,008,218

1969-70 (Exhibit 1-e)

School District	Per Capita Dollars (F-PC)	Other Dollars in Minimum Foundation (MFP)
Edgewood	2,270,516	3,364,671
North East	2,864,870	4,335,225

Alamo Heights	557,176	749,957
SAISD	8,193,507	11,044,521
Harlandale	1,743,529	3,029,536
Northside	1,772,823	3,455,434
South San	775,733	1,394,449

(Set 1—I. Series of interrogatories relating to school funds provided each school district)

(g) Amount of funds received by each district from the State, not derived from either the Minimum Foundation Program or ad valorem taxes collected by the district.

1968-69 (Exhibit 1d)

School District	Other State Funds, i.e., supplemental salary and Incentive Aid (G)
Edgewood	19,675
North East	24,194
Alamo Heights	5,225
SAISD	70,725
Harlandale	15,619
Northside	—0—
South San	6,900

1969-70 (Exhibit 1-e)

School District	Other State Funds, i.e., supplemental salary and Incentive Aid (G)
Edgewood	61,558
North East	80,135
Alamo Heights	20,444
SAISD	141,925
Harlandale	49,956
Northside	24,150
South San	21,409

(h) Amount of funds received by each district from the federal government basis for such funds.

Amount of Funds Received from Federal Agencies
(Exhibits 2-e and f)

School District	1968-69	1969-70
Edgewood	1,885,277	2,757,153
North East	1,777,326	1,505,785
Alamo Heights	299,639	245,937
SAISD	3,991,851	6,681,104
Harlandale	1,155,237	970,762
Northside	1,003,317	2,211,268
South San	725,314	632,984

(i) Amount of funds received by each district from private sources and please state the sources.

Amount of Funds Received from Private Sources,
i.e., gifts, etc.
(Exhibits 2-e and f)

School District	1968-69	1969-70
Edgewood	63,751	126,514
North East	812,926	643,590
Alamo Heights	296,238	245,511
SAISD	950,803	1,019,189
Harlandale	120,859	182,094
Northside	253,017	278,929
South San	105,289	111,832

(j) Amount of funds received by each district from other sources and please designate the sources.

(Set 1—I. Series of interrogatories relating to school funds provided each school district)

(j) Amount of funds received by each district from other sources

Amount of Funds Received from Other Sources;
 County Available, County Equalization, etc.
 (Exhibits 2-e, f)

School District	1968-69	1969-70
Edgewood	205	217
North East	231	245
Alamo Heights	54	53
SAISD	809	608
Harlandale	164	165
Northside	137	154
South San	66	71

(k) Each school district's expenditure per pupil and please provide the formula used to arrive at such expenditure.

School Districts' Expenditures Per Pupil
 (Exhibits 3-c, d)

School District	1968-69
Edgewood	332.48
North East	479.51
Alamo Heights	602.67
SAISD	456.23
Harlandale	383.38
Northside	415.89
South San	411.89

(m) Breakdown of each school district's expenditures in the following categories:

1. annual payment of bonded indebtedness
2. operation expenses
3. other expenses

1969-1970

School District	Annual Payments		
	of Bonded Indebtedness	Operation Expenses	Other Expenses
Edgewood	477,980	8,283,082	955,397
North East	2,108,419	13,815,982	1,855,888

Alamo Heights	475,253	3,360,936	1,179,404
SAISD	2,636,186	34,607,492	923,961
Harlandale	512,973	7,017,538	1,099,207
Northside	1,309,458	8,303,925	3,365,867
South San	302,846	3,410,808	1,017,056

(Set 1—II. Series of interrogatories related to general population and school population in each district.

(d) A breakdown of the student population, showing the number of students in each grade.

Enrollment by Grade (1969-70)

District	1	2	3	4	5	6	7	8	9	10	11	12	Sp. Ed.
Edgewood	2471	2360	2201	2210	2241	2001	2310	1863	1631	1418	1159	1003	329
North East	1992	2251	2228	2349	2342	2313	2492	2376	2524	2613	2209	1969	302
Alamo Hts.	361	374	385	385	433	388	487	429	483	497	480	435	82
SAISD	7084	6900	6983	6690	6651	6472	6817	6427	6333	6638	5589	4902	1014
Harlandale	1613	1629	1570	1657	1590	1558	1577	1537	1499	1265	1012	872	444
Northside	1774	1900	1968	1826	1937	1805	1868	1735	1681	1299	1172	928	363
South San	913	919	948	903	830	808	708	672	625	535	380	266	186

Enrollment by Grade (1970-71)

Data not available.

(Set 1—IV. This series of interrogatories relates to teacher characteristics in each school district)

(a) Total number of teachers in each district.

Total Number of Teachers
(Exhibits 7-a, b, c, and d)

School District	1969-70	1970-71
Edgewood	874	876
North East	1,216	1,312
Alamo Heights	269	286
SAISD	2,875	3,025
Harlandale	693	736
Northside	794	909
South San	314	368

(d) The percent of teachers with college degrees

Percent of Teachers with College Degrees
(Exhibits 7-a, b, c, and d)

School District	1969-70	1970-71
Edgewood	81.57	90.41
North East	100.00	100.00
Alamo Heights	100.00	99.65
SAISD	99.40	99.50
Harlandale	97.83	99.18
Northside	99.74	99.77
South San	97.45	99.45

(Set 1—IV. This series of interrogatories relates to teacher characteristics in each school district.

(f) The percent of teachers with Masters Degrees.

School District	1969-1970	1970-1971
Edgewood	12.58	11.30
North East	23.93	26.52

Alamo Heights	36.80	34.61
SAISD	26.95	26.41
Harlandale	21.64	18.61
Northside	17.75	16.50
South San	12.73	10.05

(g) The percent of teachers with Doctorate Degrees

School District	1969-1970	1970-1971
Edgewood	.00	.00
North East	.00	.00
Alamo Heights	.37	.34
SAISD	.06	.03
Harlandale	.00	.00
Northside	.00	.00
South San	.00	.00

(o) The salary expenditure for teachers per student

Salary Expenditures for Teachers Per Student
(Exhibits 9-a, b, c, and d)

School District	1969-70
Edgewood	240.94
North East	324.97
Alamo Heights	414.47
SAISD	280.28
Harlandale	275.18
Northside	283.70
South San	254.98

(Set 1—V. This series of interrogatories relates to student characteristics.)

(i) The average daily class attendance in each district.

Average Daily Class Attendance
(Exhibits 9-a, b, c, and d)

School District	1969-70
Edgewood	92.96
North East	95.02
Alamo Heights	93.84
SAISD	90.58
Harlandale	92.18
Northside	94.20
South San	93.18

(Set 1—VII. This series of interrogatories relates to the administrative and advisory personnel in each district.)

(d) The Counselor-student ratio

Counselor-Student Ratio
(Exhibit 9-a, b, c, and d)

School District	1969-70
Edgewood	5,480
North East	1,077
Alamo Heights	1,254
SAISD	2,265
Harlandale	1,566
Northside	1,742
South San	1,626

Number and Percent of Anglo-American, Spanish Surname,
and Negro Students in Each School and in Each District

(Exhibit 10)
(d), (e) and (f)

School District and Campus		No. of Anglo- Ameri- can Students	%	No. of Negro Students	%	No. of Mexican- Ameri- can Students	%	Total Number of Students
Edgewood	001	42	2.5	213	12.6	1,428	84.7	1,685
	002	125	6.0	74	3.5	1,889	90.3	2,092
	003	49	3.3	64	4.4	1,357	92.3	1,470
	041	38	6.4	29	4.9	530	88.8	597
	042	4	0.5	3	0.4	809	99.1	816
	043	9	1.0	3	0.3	893	98.7	905
	044	0	0.0	225	46.8	256	53.2	481
	045	18	1.8	9	0.9	998	97.3	1,026
	101	55	6.5	2	0.2	788	93.3	845
	102	0	0.0	2	0.3	622	99.7	624
	103	0	0.0	0	0.0	246	100.0	246
	104	15	1.9	2	0.2	789	97.9	806
	105	18	2.2	0	0.0	797	97.8	815
	106	15	1.5	4	0.4	951	98.0	970
	107	20	1.9	6	0.6	1,025	97.5	1,051
	108	2	0.2	12	1.1	1,074	98.7	1,088
	109	0	0.0	344	63.6	197	36.4	541
	110	12	1.4	11	1.3	830	97.3	853
	111	5	0.9	195	36.0	342	63.1	542
	112	18	1.4	2	0.2	1,266	98.4	1,286
	113	7	1.0	0	0.0	684	99.0	691
	114	29	2.7	9	0.8	1,041	96.5	1,079
	115	19	1.8	2	0.2	1,051	98.0	1,072
	116	327	44.6	189	25.7	215	29.3	734
	117	9	2.4	73	19.5	292	78.1	374
Edgewood	District Totals	836	3.7	1,473	6.5	20,370	89.8	22,689

North	001	2,265	88.0	0	0.0	299	11.6	2,574
East	002	2,225	96.2	6	0.3	79	3.4	2,313
	003	2,238	97.2	0	0.0	63	2.7	2,303
	004	2,212	91.2	19	0.8	174	7.2	2,425
	041	1,363	95.6	0	0.0	58	4.1	1,426
	042	1,240	94.3	5	0.4	67	5.1	1,325
	043	996	87.0	13	1.1	128	11.2	1,145
	044	1,291	85.2	2	0.1	217	14.3	1,515
	045	754	91.0	8	1.0	64	7.7	829
	046	911	86.7	0	0.0	137	13.0	1,051
	101	297	90.0	3	0.9	30	9.1	330
	102	538	94.6	0	0.0	30	5.3	569
	103	505	88.9	0	0.0	61	10.7	568
	104	469	79.2	1	0.2	122	20.6	592
	105	569	86.5	2	0.3	73	11.1	658
	106	756	92.9	1	0.1	56	6.9	814
	107	450	90.9	2	0.4	36	7.3	495
	108	363	96.3	0	0.0	14	3.7	377
	109	316	95.8	0	0.0	10	3.0	330
	110	554	96.9	2	0.3	12	2.1	572
	111	528	80.9	0	0.0	125	19.1	653
	112	503	85.0	0	0.0	84	14.2	592
	113	514	86.5	0	0.0	80	13.5	594
	114	481	83.9	11	1.9	79	13.8	573
	115	493	77.2	0	0.0	144	22.5	639
	116	529	88.6	17	2.8	49	8.2	597
	117	457	97.2	2	0.4	9	1.9	470
	118	569	86.9	12	1.8	56	8.5	655
	119	444	79.9	1	0.2	111	20.0	556
	120	399	92.6	0	0.0	30	7.0	431
North East								
District Totals		25,229	90.2	107	0.4	2,497	8.9	27,961
Alamo	001	1,162	87.1	8	0.4	224	12.1	1,850
Heights	041	737	83.4	8	0.9	138	15.6	884
	101	755	94.4	7	0.9	35	4.4	800

	102	439	64.7	8	1.2	230	33.9	679
	103	284	48.9	0	0.0	297	51.1	581
	104	453	94.0	2	0.4	26	5.4	482
Alamo Heights								
Totals		4,280	81.1		33	0.6	950	18.0
SAISD	001	167	9.6	330	19.0	1,243	71.4	1,740
	002	291	14.3	12	0.6	1,737	85.1	2,041
	003	972	54.1	41	2.3	768	42.7	1,798
	004	19	1.0	455	22.9	1,510	76.1	1,985
	005	1,740	58.4	676	22.7	558	18.7	2,978
	006	996	44.9	988	44.5	218	9.8	2,218
	007	1,254	42.4	259	8.8	1,417	47.9	2,956
	008	68	3.0	5	0.2	2,167	96.7	2,240
	041	660	69.3	7	0.7	285	29.9	952
	042	13	1.3	0	0.0	971	98.7	984
	043	413	35.7	507	43.9	232	20.1	1,156
	046	9	1.1	663	77.5	184	21.5	856
	047	57	6.7	0	0.0	787	92.8	848
	048	121	18.6	150	23.1	371	57.1	650
	049	45	3.8	192	16.4	935	79.7	1,173
	050	592	50.5	3	0.3	570	48.6	1,173
	051	110	12.9	21	2.3	724	84.6	856
	052	234	22.5	83	8.0	717	68.9	1,040
	053	128	12.2	232	22.1	692	65.8	1,052
	054	61	8.8	309	44.7	321	46.5	691
	055	21	1.9	9	0.8	1,066	97.0	1,099
	056	232	21.9	731	69.2	87	8.2	1,057
	057	892	80.1	19	1.7	199	17.9	1,113
	058	256	28.4	51	5.7	589	65.4	901
	059	546	51.2	3	0.3	517	48.5	1,066
	061	17	1.3	11	0.9	1,246	97.8	1,274
	101	269	67.6	2	0.5	124	31.2	398
	102	42	11.3	10	2.7	316	84.7	373
	103	339	55.0	9	1.5	266	43.2	616
	104	8	1.3	0	0.0	621	98.7	629

105	308	74.4	2	0.5	98	23.7	414
106	82	15.6	10	1.9	432	82.3	525
107	43	8.8	10	2.1	431	88.5	487
108	23	3.0	20	2.6	713	94.3	756
110	12	0.9	13	1.0	1,277	98.1	1,302
111	6	0.6	3	0.3	949	99.1	958
112	23	3.8	0	0.0	579	95.9	604
113	56	7.7	163	22.5	505	69.8	724
114	38	17.3	160	72.7	22	10.0	220
115	10	1.3	4	0.5	757	98.2	771
116	72	8.2	0	0.0	808	91.7	881
117	115	23.6	3	0.6	367	75.2	488
118	33	3.2	1	0.1	992	96.6	1,027
121	7	1.0	0	0.0	695	99.0	702
122	0	0.0	272	70.5	114	29.5	386
123	52	11.0	10	2.1	412	86.9	474
124	207	47.2	17	3.9	215	49.0	439
125	454	75.7	12	2.0	132	22.0	600
126	197	48.5	0	0.0	209	51.5	406
127	9	0.9	978	96.2	30	2.9	1,017
128	29	17.9	3	1.9	130	80.2	162
129	122	11.1	2	0.2	970	88.6	1,095
130	13	1.7	338	45.4	393	52.8	744
131	50	18.1	0	0.0	227	81.9	277
132	13	3.7	186	52.7	154	43.6	353
134	524	67.8	14	1.8	233	30.1	773
135	142	23.5	55	9.1	400	66.3	603
136	47	5.5	0	0.0	802	94.5	849
137	501	71.2	92	13.1	108	15.3	704
138	4	0.9	7	1.6	415	97.4	426
139	126	18.9	0	0.0	539	81.1	665
140	14	2.1	0	0.0	659	97.3	677
141	54	33.1	17	10.4	92	56.4	163
142	19	3.7	0	0.0	501	96.3	520
143	128	22.0	6	1.0	447	76.9	581
144	57	5.5	8	0.8	967	93.4	1,035

145	8	2.8	2	0.7	275	46.5	285	
146	106	55.2	22	11.5	63	32.8	192	
147	12	2.3	195	37.6	311	60.0	518	
148	220	35.0	2	0.3	402	63.9	629	
150	281	56.9	1	0.2	207	41.9	494	
151	28	19.4	6	4.2	110	76.4	144	
152	70	18.4	12	3.1	292	76.6	381	
153	2	0.3	629	90.1	67	9.6	698	
154	13	2.9	8	1.8	423	95.3	444	
155	223	47.5	2	0.4	242	51.6	469	
156	13	3.0	188	43.4	232	53.6	433	
157	23	2.3	40	4.1	919	93.6	982	
158	25	3.8	400	61.2	229	35.0	654	
159	120	57.7	14	6.7	72	34.6	208	
160	92	16.8	2	0.4	454	82.8	548	
161	201	23.5	64	7.5	587	68.5	857	
162	22	3.8	0	0.0	552	96.2	574	
164	798	82.3	9	0.9	161	16.6	970	
165	12	1.4	435	50.9	408	47.7	855	
167	209	54.9	3	0.8	169	44.4	381	
168	123	18.1	196	28.8	358	52.6	680	
169	40	3.8	4	0.4	1,013	95.8	1,057	
170	133	25.5	8	1.5	373	71.6	521	
171	0	0.0	418	97.4	11	2.6	429	
172	0	0.0	620	94.8	34	5.2	654	
173	297	53.1	170	30.4	87	15.6	559	
174	139	28.7	0	0.0	345	71.2	484	
175	127	21.7	1	0.2	457	78.0	586	
176	133	35.3	4	1.1	239	63.4	377	
177	27	7.4	208	57.3	128	63.4	372	
178	45	42.5	6	5.7	55	51.9	106	
SAISD								
Totals	17,704	22.9	11,853	15.3	47,487	61.5	77,253	
Harlandale	001	469	17.2	3	0.1	2,249	82.7	2,721
	002	1,300	66.1	0	0.0	667	33.9	1,967
	041	385	29.2	6	0.5	929	70.4	1,320

042	40	3.0	5	0.4	1,306	96.7	1,351	
043	798	57.6	0	0.0	586	52.3	1,385	
044	365	57.5	0	0.0	270	42.5	635	
101	178	40.9	0	0.0	257	59.1	435	
102	478	66.1	3	0.4	240	33.2	723	
103	24	4.0	0	0.0	579	96.0	603	
104	28	3.0	3	0.3	897	96.6	929	
105	15	3.3	0	0.0	440	96.7	461	
106	124	16.2	0	0.0	640	83.8	764	
107	284	52.8	0	0.0	252	46.8	538	
108	351	45.3	0	0.0	424	54.7	775	
109	91	17.8	0	0.0	419	82.0	511	
110	173	28.6	0	0.0	432	71.4	605	
111	286	79.0	2	0.6	74	20.4	362	
112	10	1.8	1	0.2	541	98.0	552	
113	144	25.3	0	0.0	426	74.7	570	
114	262	43.8	16	2.7	320	53.5	598	
115	66	44.0	0	0.0	83	55.3	150	
Harlandale								
Totals	5,871	32.7	39	0.2	12,037	67.0	17,955	
Northside	001	1,113	74.3	28	1.9	344	23.0	1,497
	002	2,039	83.1	92	3.7	298	12.1	2,455
	003	1,579	92.2	5	0.3	123	7.2	1,712
	041	1,204	88.4	2	0.1	155	11.4	1,362
	042	834	80.6	40	3.9	145	14.0	1,035
	043	278	55.0	17	3.4	209	41.4	505
	044	681	74.2	50	5.4	104	17.9	918
	101	231	33.1	10	1.4	457	65.5	698
	102	595	79.3	33	4.4	117	15.6	750
	103	392	92.7	1	0.2	24	5.7	423
	104	295	79.3	2	0.5	73	19.6	372
	105	662	75.4	26	3.0	180	20.5	878
	106	622	78.7	50	6.3	103	13.0	790
	108	382	77.3	0	0.0	109	22.1	494
	109	322	78.3	0	0.0	89	21.7	411
	110	42	68.9	0	0.0	19	31.1	61

	111	388	72.0	0	0.0	148	27.5	539
	112	444	64.7	7	1.0	234	34.1	686
	113	475	85.3	6	1.1	72	12.9	557
	114	674	73.3	37	4.0	206	22.4	919
	115	589	84.7	0	0.0	99	14.2	695
	116	281	28.4	41	4.1	664	67.2	988
	117	652	78.6	48	5.8	120	15.2	829
	118	546	92.2	2	0.3	44	7.4	592
	119	521	95.1	0	0.0	27	4.9	548
	120	2	1.8	6	5.3	105	92.9	113
	121	22	42.3	10	19.2	20	38.5	52
	122	233	62.8	49	13.2	85	22.9	371
Northside								
	Totals	16,098	75.8	562	2.6	4,439	20.9	21,250
South San								
001	737	36.1	34	1.7	1,265	62.0	2,040	
041	553	36.8	38	2.5	906	60.4	1,501	
101	72	17.3	1	0.2	340	81.7	416	
103	136	22.1	2	0.3	476	77.5	614	
104	232	36.9	3	0.5	394	62.6	629	
105	61	6.1	3	0.3	938	93.6	1,002	
106	42	6.2	0	0.0	634	93.8	676	
107	97	16.6	19	3.3	467	80.1	583	
108	643	71.4	77	8.5	180	20.0	901	
109	316	87.5	23	6.4	20	5.5	361	
110	417	83.6	20	4.0	54	10.8	499	
South San								
	Totals	3,306	35.8	220	2.4	5,674	61.5	9,222

III. State the dropout rate for the districts sampled by the Governor's Committee on Public School Education, and which data is now in the control of the Texas Education Agency in the following manner:

- (a) For the school district as a whole
- (b) For the various ethnic groups in the school district

- (c) By grade; and
- (d) By grade for each ethnic group

ANSWER: The Governor's Committee on Public School Education promised its sample school districts that it would not reveal certain data such as dropout rates by individual school districts. The Texas Education Agency accepted this same responsibility as custodian of the Governor's Committee on Public School Education research files. The Texas Education Agency, therefore, will release no data on individual school districts except that which may be contained in the published reports of the Governor's Committee, copies of which have been made available to counsel for the Plaintiffs, unless ordered to do so directly by the Court.

IV. State the achievement score for the districts sampled by the Governor's Committee on Public School Education, and which data is now in the control of the Texas Education Agency in the following manner:

- (a) Average high school senior test scores; and
- (b) Average eighth grade test score.

ANSWER: The Governor's Committee on Public school Education promised its sample school districts that it would not reveal certain data such as dropout rates by individual school districts. The Texas Education Agency accepted this same responsibility as custodian of the Governor's Committee on Public School Education research files. The Texas Education Agency, therefore, will release no data on individual school districts except that which may be contained in the published reports of the Governor's Committee, copies of which have been made available to counsel for the Plaintiffs, unless ordered to do so directly by the Court.

XVI. Do you agree with the figures shown in said table?

ANSWER: We neither agree nor disagree with the figures in Exhibit A, as mentioned in interrogatory No. VX. We certainly would not question the ability or integrity of the staff of the Municipal Advisory Council of Texas. We consider the Council's work to be excellent in every respect. We simply do not know how the data were obtained. If such data were obtained from school district reports or questionnaires, our experience has been that some school districts simply do not know the exact market value of all taxable property in the district within a reasonable percentage of error. Without such exact data on market value there can be no valid comparison of assessed value for tax purposes to market value. Further, the Texas Education Agency has no valid data of its own to compare with the market value data in Exhibit A (Table 5).

**AFFIDAVITS ATTACHED TO DEPOSITIONS OF
BERKE, WEBB, CARDENAS, AVENA AND
MORGAN.**

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DEMETRIO P. RODRIGUEZ, ET AL.,
Plaintiffs,
vs.

SAN ANTONIO INDEPENDENT
SCHOOL DISTRICT, ET AL.,
Defendants.

CIVIL ACTION NO. 68-175-SA

AFFIDAVIT

DISTRICT OF COLUMBIA, SS:

JOEL S. BERKE, being duly sworn, says:

I am the Director of the Educational Finance and Governance Program of the Policy Institute, Syracuse University Research Corporation, and Adjunct Professor of Political Science, Syracuse University.

The SURC Policy Institute is a not for profit research organization affiliated with but legally independent of Syracuse University. The research activities of the program I direct are closely interrelated with the research and teaching activities of the Maxwell Graduate School of Syracuse University, in particular with faculty and graduate students interested in the study of public finance as it bears upon American public education.

During the last two years, I have directed the following studies related to educational finance: first, a two year study supported by the Ford Foundation which

investigated the patterns of allocation of federal aid to education and the decision-making patterns which underlay those decisions in Washington, D. C. and in six states, of which Texas was one. A number of articles, monographs, and a forthcoming book have resulted from that research, *Federal Aid to Public Education: Who Benefits?* (a committee print of the United States Senate Committee on Equal Educational Opportunity, of which I am the principal author, is attached as Appendix A). Second, for the New York State Commission on the Quality Cost, and Financing of Education, I served as co-director of a study intended to evaluate New York's school finance program, devise alternatives, and through computer simulation demonstrate the financial impact of new aid formulas and distribution mechanisms. The report of that study is currently under consideration by two interested publishers. Third, I am executive director of a study for the United States President's Commission on School Finance intended to improve information available relating to educational finance. Fourth, I am at present a Guest Scholar at the Brookings Institution in Washington, D. C. under a grant from the Ford Foundation designed to permit me to conduct research and complete a manuscript on the political and economic aspects of equal educational opportunity. Fifth, I am co-author of a study for the United States Senate, Committee on Equal Educational Opportunity titled "Financial Aspects of Equality of Educational Opportunity".

In the conduct of this study of Texas school finance I have had the valuable assistance of a number of highly qualified colleagues. Most integrally involved in the conduct of the study which is the subject of this affidavit were Anthony Carnevale and Daniel Martin, candidates for the Ph.D. degree at Syracuse University. Professor Seymour Sacks, one of the nation's

leading scholars of the economics of education, gave invaluable advice and guidance at numerous points over the last few months and has served as principal consultant on several of the projects mentioned above which had direct relevance to this study of Texas school finance. Ronald D. White of the Policy Institute staff and Barrie L. Goldstein, now a student at George Washington University School of Law, provided assistance in the conduct of the research, as did Professor Robert Firestone of the University of Florida Urban Studies Program. While my debt to these individuals and to the organizational assistance of the Policy institute cannot be overstated, I am fully responsible for the contents of the materials prepared for this affidavit.

INTRODUCTION AND SUMMARY

This affidavit has been prepared as a result of a study of school finance in the State of Texas directed by researchers who have spent the last two years in the analysis of the official financial records of the Texas State Education Department and the Governor's Committee on Public School Education¹. On the basis of that analysis we conclude that the system of school finance in Texas makes the quality of education a direct function of the wealth of local school districts, providing consistently higher quality schooling in districts with higher property values per pupil and consistently lower quality education in school systems with less local resources available for taxation. Furthermore, our study demonstrates that the poorer districts tax themselves at consistently higher equalized tax rates yet realize far lower tax yields than is true in the richer districts.

¹For a description of the procedures and methodology used in this study, please see Appendix B.

Discrimination against the poor is not limited to poverty as measured by property valuation: school districts with lower median family incomes are disadvantaged in regard to the quality of school services. School systems with the highest average income have the highest school expenditures; districts with the lowest average incomes have the lowest school expenditures.

Racial discrimination is also readily apparent in Texas educational finance. There is a consistent pattern of higher quality education in districts with higher proportions of Anglo-Americans, and lower quality education in districts with lower proportions of Anglos. In short, the more Negroes and Mexican-Americans in the school population of a district, the lower its revenues for education.

The effects of these financial patterns have direct impact on the quality of education offered to Texas school children. Both the average salary levels, which are reflective of the quality of teachers, and the number of professional personnel per pupil vary directly and markedly with the revenues available per pupil. Thus, in general, the higher the revenues for the schools, the higher the quality of education in the district.

Our study also shows that responsibility for bringing about this invidious pattern of educational resource allocation rests squarely with the state for two reasons. First, the creation by the state of local districts with unequal taxable resources plays the primary part in establishing a system biased in favor of richer districts. Second, by adopting a state aid system that is insufficiently equalizing to offset the disparities among districts, discrimination against the poor in the provision of school services is assured. In the eyes of the experts who participated in our study a system more effectively designed to assure inequality of edu-

cational opportunity would be difficult to design. Yet as the data which follows will indicate, just such a system currently exists in the State of Texas as a whole and in Bexar County in particular.

DISTRICT WEALTH, INCOME, RACE AND SCHOOL REVENUES

The basic measure of district wealth employed in this study is the value of equalized taxable property¹ per pupil in average daily attendance. While from an economic standpoint there are questions as to whether property value is itself an appropriate criteria of a community's ability to raise revenue, we employ that basic measure because property taxation provides virtually all locally raised revenues for education. In addition, as Table I (see page 6) indicates, there is a rough but important correlation between relative levels of property value and relative levels of average income in school districts: districts high in property value per pupil are high in average income; those that are moderate in property value are moderate in income level, and those low in property valuation are also low in income.

District Wealth and School Revenue

For purposes of analysis, we have grouped the 110 districts into categories of descending amounts of equalized property per pupil, or in other words, descending order of community wealth. If we compare the average state and local revenues per pupil as shown on Table I (see page 6) with those district wealth categories, a clear and consistent relationship emerges: the richer the district, the higher the revenues available for each pupil's education. Graph I (see page 7) demonstrates the relationship visually, and shows how very

¹See Appendix C for an explanation of "equalized taxable property".

direct and regular it is. Note also the extreme range in both wealth and expenditure categories, from well over \$100,000 to well below \$10,000 in valuation, and from \$815 to \$305 in expenditures, ratios approaching 20:1 in property value and 2:1 in expenditures. The expenditure range in our sample is an average, and is therefore a particularly compelling statistic, indicating that a regular pattern exists in which children in poor communities consistently receive an education two and one half times less costly than children who live in wealthier places. (For the state as a whole, the ratio of the highest expenditure district to the lowest is \$5,334 to \$264 or 20:1.)

TABLE I
THE RELATIONSHIP BETWEEN DISTRICT
WEALTH, INCOME, RACE, AND SCHOOL
REVENUES

TEXAS SCHOOL DISTRICTS

Categorized by Equalized Property Values,
Median Family Income, and State-Local Revenue

Market Value of Taxable Property Per Pupil ¹	Median Family Income From 1960 ²	Per Cent Minority Pupils ³	State & Local Revenues Per Pupil ⁴
Above \$100,000 (10 Districts)	\$5,900	8%	\$815
\$100,000-\$50,000 (26 Districts)	\$4,425	32%	\$544

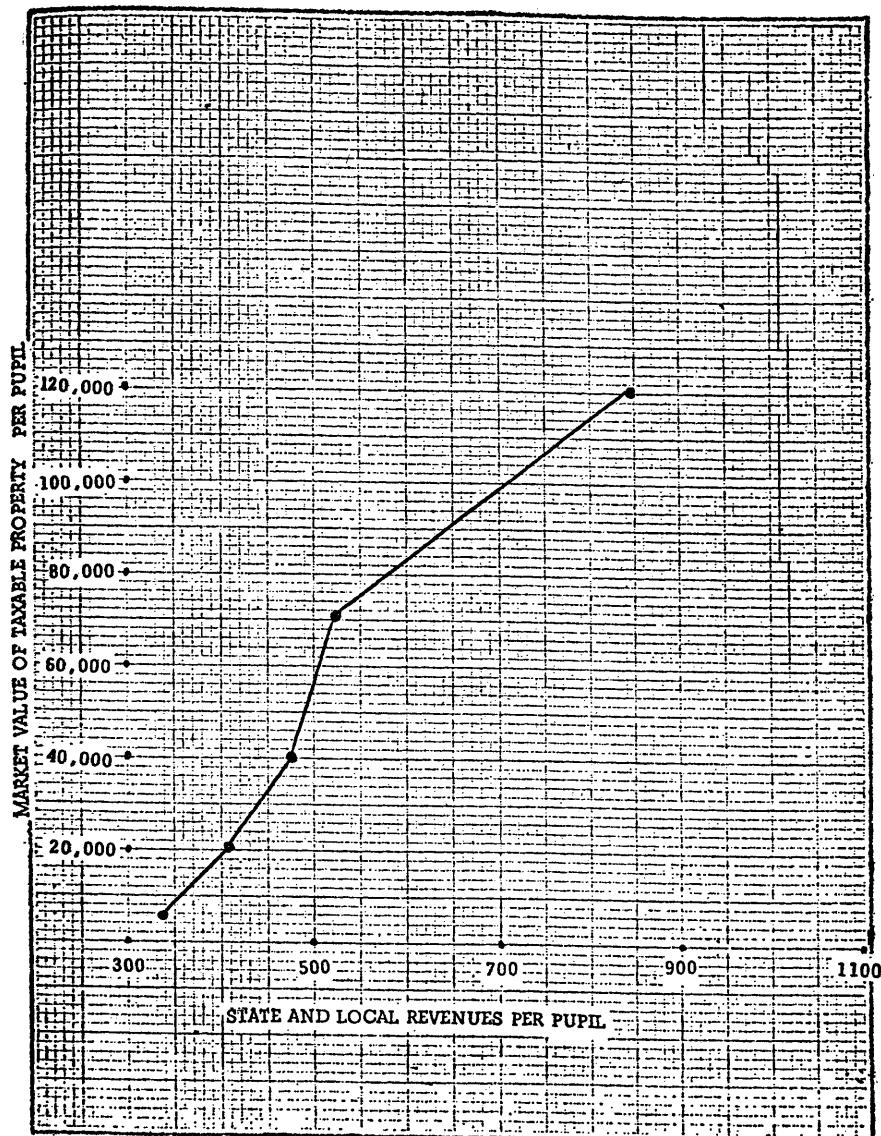
¹Policy Institute, Syracuse University Research Corporation, Syracuse, N. Y.

²1960 U.S. Census data. 1970 Census data on income levels is not yet available from the U.S. Department of Commerce; however, when it is available, it can readily be supplied to the Court. The projected availability date is late 1971 or early 1972.

³Directory of Public Elementary and Secondary Schools in Selected Districts, Office of Education, HEW.

⁴Op. Cit., SURC.

GRAPH I
THE RELATIONSHIP BETWEEN DISTRICT WEALTH
AND STATE-LOCAL REVENUES*



* Source: Policy Institute, Syracuse University Research Corporation, Syracuse, New York.