

Policy Brief

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Feds in the Classroom II: The Implications of Federal Intervention on IDEA Discipline for States

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Executive Summary

In the closing days of the Obama Administration, the Department of Education (ED) created a new rule with regard to discipline policy for all states. In order to address disproportionality in the rates of identification of disability and discipline policies for minority disabled students, ED required states to set Risk Ratio Thresholds (RRTs) above which a district would be deemed to have significant disproportionality, leading to a reallocation of federal IDEA funds. As we explain more fully below, the RRT is a way to compare the rates at which students in different racial groups are disciplined. Under the Trump Administration, ED delayed this rule due to concerns that this would set up an unconstitutional system of racial quotas as school districts modified their disciplinary policies to achieve greater racial “balance.” Recently, ED announced that it would require states to implement this rule now, but would revise the rule at a later date.

Despite the delay over concerns about quotas, little work has been done to examine the extent to which this rule would lead to the imposition of standards that would cause districts to keep misbehaving students in the classroom in order to maintain greater racial “balance” and not have a RRT that was “too high.” In effect, this would establish de facto racial discipline quotas. This study endeavors to examine this problem. Using data on the 10 largest school districts in every state, we examine the number of districts where quotas would likely be imposed at varying RRTs. Among the key findings:

More than half of states would have problematic districts at RRTs of 4 for African American Students. Even at this very high threshold, 29 states have districts where discipline rates for African American students with disabilities that exceed this threshold. These states are primarily found in the northern and western parts of the U.S.

All States except Hawaii would have problematic districts at RRTs of 2 for African American students. At this threshold which is among the lowest we observed to be implemented by states, districts would be identified in every state. The lone exception is Hawaii, which has a statewide school district.

Nine States have problematic districts at RRTs of 4 for Hispanic students. The highest common RRT threshold still leads to problematic districts in nine state located primarily in the northeast and Midwest, though this is far fewer than the number of problematic districts identified for African American students.

The differential suspension rates for African American and Hispanic students is suggestive that many factors are at play. African American students are suspended at a significantly higher rate than Hispanic students, calling into question the extent to which higher suspension rates for African Americans are purely the result of racism by white teachers.

These findings lead to two recommendations. At the state level, RRTs should be set at as high a threshold as possible to avoid flagging a large number of districts where discipline disparities might well be explained by other means. At the federal level, the Department of Education should consider not implementing this regulation at all.

Background on IDEA

The Individuals with Disabilities Education Act (IDEA) and its precursors have been in force since 1975 with the goal of providing students with disabilities a free public education tailored to their individual needs. IDEA and its implementing regulations are structured to provide students with disabilities the same opportunities as students without.

Concerned that schools may disproportionality be identifying children from minority racial and ethnic backgrounds, Congress amended IDEA to require states to collect and examine certain data points and to make determinations if “significant disproportionality” was occurring on the basis of race or ethnicity in the identification and placement of students.

Specifically, 20 U.S.C. § 1418(d)(1) requires states to collect and report data regarding the identification, placement, and discipline of children with disabilities. Where there is a determination that significant disproportionality on the basis of race or ethnicity is occurring in the identification and placement of students, 20 U.S.C. §1418(d)(2) requires the Department of Education (ED) to review and revise the “policies, procedures and practices” to ensure that they comply with federal requirements.

The core belief underlying special attention to suspensions among students with disabilities is that such students as a whole are suspended at a disproportionate rate. However, research has called that into question. A comprehensive national study that included nearly 7,000 students with and without disabilities found that suspension rates are not predicted by disability status once other factors—such as family income and gender—are taken into account (Morgan et. al. 2019).

The evidence on the role of racial discrimination in school discipline practices has been even more controversial. There is growing evidence that factors other than race may be the primary cause of disparities in the rate of suspensions among different racial groups. In 2017, WILL conducted a study of Wisconsin school districts that found race did not play a role in most major school district’s suspension rates once the socioeconomic characteristics of the students were accounted for (Flanders and Goodnow 2017). A much larger study used comprehensive data that tracked students for several years to account for the role of prior misbehavior in student suspensions. This study found that prior misbehavior completely accounted for the racial gap in suspensions—meaning that *any* discriminatory practices by educators only exist on the margins (Wright et. al. 2014).

If discipline disparities are purely the result of racism on the part of white teachers, one might expect that *all* racial minorities see higher rates of suspension than white students. However, this is not the case. A recent study by scholars from the Brookings Institute found that Asian students in California are suspended at about one quarter the rate of whites (Loveless 2017). Given that Asian Americans have been the subject of sometimes overt discrimination in other contexts (e.g. Dong 1995), this evidence calls into question the underlying premise that this is a story of racism.

Perhaps the best counterpoint to the argument that minority students are suspended because of racism on the part of educators comes from studies that compare discipline outcomes of students with the race of teachers. A recent study from North Carolina found that African American students who have classes with all African American teachers are only about 2% less likely to be suspended than the same type of student with all white teachers (Lindsay and Hart 2017).

If school districts implement policies that set quotas for discipline, this can lead to under disciplining students who have engaged in conduct that otherwise would require discipline. The problems from under disciplining students are twofold. First, teachers risk losing their ability to effectively control their classrooms. Polls of educators around the country have found that teachers in districts that implement softer discipline policies that eschew suspension and expulsion largely don't think they are effective (Eden 2017). This disorder in the classroom has been found to relate to worsened academic outcomes for schools overall (Flanders and Goodnow 2018). Secondly, not disciplining students who need it means that the student doesn't generate a record for a particular transgression. This can decrease the likelihood that the student is diagnosed with a very real emotional or behavioral disability, and impedes later teachers from knowing how to effectively deal with the student.

Recent Regulatory Changes

Initially, to comply with IDEA, states were allowed to set their own threshold in order to determine whether or not "significant disproportionality" existed. In February, 2013, the Government Accountability Office (GAO) released a report entitled "Individuals with Disabilities Education Act: Standards Needed to Improve Identification of Racial and Ethnic Overrepresentation in Special Education" (2013). In that report, GAO found that states were using widely varying definitions and methodologies to comply with the IDEA "significant disproportionality" reporting requirements. As a result, ED put out a request for information in 2014 and began reviewing state definitions.

Following the GAO report and the additional comments and ED research, ED determined that another rulemaking was needed.¹ On December 19, 2016, ED published final regulations at 81 FR 92376. In its summary, ED explained that this new regulation:

... will establish a standard methodology States must use to determine whether significant disproportionality based on race and ethnicity is occurring in the State and in its local educational agencies (LEAs); clarify that States must address significant disproportionality in the incidence, duration, and type of disciplinary actions, including suspensions and expulsions, using the same statutory remedies required to address

¹ See 81 FR 92376, 92395 ("The recommendations of the GAO, public comments the Department received in a response to a 2014 request for information (79 FR 35154), and the Department's review of State definitions of significant disproportionality all informed the Department's decision to require that all States follow a standard methodology.")

significant disproportionality in the identification and placement of children with disabilities; clarify requirements for the review and revision of policies, practices, and procedures when significant disproportionality is found; and require that LEAs identify and address the factors contributing to significant disproportionality as part of comprehensive coordinated early intervening services (comprehensive CEIS) and allow these services for children from age 3 through grade 12, with and without disabilities.

A local education agency that has significant disproportionality faces a monetary penalty of sorts. IDEA requires “any local educational agency identified [as significantly disproportionate] to reserve the maximum amount of funds under section 1413(f) of this title to provide comprehensive coordinated early intervening services to serve children in the local educational agency, particularly children in those groups that were significantly overidentified...” 20 U.S.C. 1418(d)(2). The “maximum amount” referenced is 15% of the local education agency’s IDEA, Part B funds.

This regulation was set to take effect on July 1, 2018. On July 3, 2018, ED published a new regulation at 83 FR 31306 which delayed the implementation date by two years in order to conduct further analysis of the “significant disproportionality” regulation to ensure it was, in fact, lawful. There were a number of reasons given for this, but one area of particular legal concern was that the “significant disproportionality” regulation may, in practice, establish an unconstitutional system of racial quotas. As ED explained:

We agree with commenters that the 2016 significant disproportionality regulations may create an incentive for LEAs to establish de facto quotas for the identification, placement, and discipline of children with disabilities and to artificially reduce the number of children identified, placed outside of the regular classroom, and disciplined to avoid being identified with significant disproportionality and being required to reserve 15 percent of their IDEA Part B subgrant to provide comprehensive CEIS. We are delaying the compliance date to evaluate our regulatory approach to ensure that it implements the statute in a manner that does not incentivize quotas.

Legal Challenge to the Delay Rule

In July, 2018, following the publication of the “delay rule,” an advocacy organization known as the “Council of Parent Attorneys and Advocates, Inc.” filed an Administrative Procedures Act lawsuit seeking to declare the “delay rule” unlawful. The suit was filed in the United States District Court for the District of Columbia. Following briefing, on March 7, 2019, a judge granted COPAA’s motion for summary judgment and vacated the “delay rule.” But on May 21, 2019, while an appeal of the District Court decision was still pending, ED made it known that

states are expected to begin implementing the underlying regulation. In a statement posted to the Office of Special Education website, they stated:

“Pursuant to the plain language of the December 19, 2016 Equity in IDEA regulation on significant disproportionality, and in conjunction with the March 7, 2019 decision in *COPAA v. Devos*, the Department expects States to calculate significant disproportionality for the 2018–2019 school year using the 2016 rule’s standard methodology, or to recalculate using the 2016 rule’s standard methodology if a different methodology has already been used for this school year.”

Underlying Legal Concerns

While the delay regulation itself has been vacated, there remain underlying legal concerns with the “significant disproportionality” regulation itself. ED’s belief that it may create a de facto racial quota system is a very real concern, and one that would render the regulation itself unconstitutional.

As one commenter noted to ED, “the rule will pressure school districts to violate the Fourteenth Amendment’s equal-protection clause through its definition of ‘significant disproportionality,’ which focuses on statistical group outcomes, rather than the accuracy of identification or evaluation.”² To support that conclusion, the commenter pointed to the Seventh Circuit’s opinion in *People Who Care v. Rockford Board of Education*, 111 F.3d 528 (7th Cir. 1997).

In *People Who Care*, the Seventh Circuit struck down racial quotas, holding “Racial disciplinary quotas violate equity in its root sense. They entail either systematically overpunishing the innocent or systematically underpunishing the guilty. They place race at war with justice. They teach schoolchildren an unedifying lesson of racial entitlements.” *Id.*, 111 F.3d at 538. To the extent that ED’s underlying “significant disproportionality” rule establishes racial quota systems, that regulation is unconstitutional.

This research looks at the implications of this new rule for school districts across the country.

² See Comments of Hans Bader, document ID: ED-2017-OS-0074-5955. Dated August 15, 2017. Available at: <https://www.regulations.gov/document?D=ED-2017-OS-0074-5955->

Relative Risk Threshold

The federal government has mandated that states use a Relative Risk Threshold (RRT) in identifying districts that have significant disproportionality in their suspensions. For districts that have a sufficient number of students of the race in question, a district determines the risk that a student from a particular race will experience a suspension, and compares that rate to the risk that students from any other racial group will experience a suspension. As an illustration, consider a hypothetical district with 100 special needs students, 20 of whom are African American. Assume further that 5 African American students in the district experience an out-of-school suspension, and that 10 students of other races experience one. The relative risk ratio for African American students is calculated as follows:

$$\frac{5/20}{10/(100 - 20)} = 2.00$$

This relative risk ratio is then compared to the state's RRT—a number that states are given freedom under the Department of Education to set at a “reasonable” point. In the case of our hypothetical district, if the state had an RRT of less than 2, the district would be in danger of being identified as having significant disproportionality in its suspension rates.

Beyond out-of-school suspension, states are required to determine violations of other RRTs as well. These include in-school suspensions of both fewer than and more than 10 days, removals to an alternative education setting, and removals by hearing officers. It should be noted that states are afforded the freedom to add a bit more nuance to this if they so choose. States can vary the rate based on type of disability. They can also choose to use three years of data rather than a single year before determining that a problem exists in a particular district. In our survey of state regulations, we did not identify many states that are taking advantage of this freedom.

When a district has a risk ratio in violation of the state standard, the state may need to implement discipline quotas to avoid the loss of a portion of federal special needs funding. It must get the numbers ‘right.’ Quotas set an arbitrary limit on the number of suspensions that students from a certain racial group can receive, regardless of whether a particular behavior would otherwise warrant a suspension. They are most likely to be implanted by a greater reluctance to discipline minority students (as opposed to a greater propensity to discipline white students). Such quotas can have dire consequences for student safety. In Syracuse, New York, the implementation of softer discipline policies led the president of the Syracuse Teachers Association to express worries about the safety of teachers and students:

“Restorative justice that ensures student civil rights and seeks to keep them in school is a laudable practice that our members wholeheartedly embrace. No one has a stronger desire to see our students (so many of them struggling under extremely difficult circumstances beyond the classroom) succeed than the folks who have dedicated their lives to public education. Providing students with the best opportunities for success, however, cannot be achieved in a chaotic and frequently violent atmosphere.”
(Syracuse.com, April 8, 2014)

In New York City, the Manhattan Institute found that these policies disproportionality harmed the environment in schools with large numbers of minority students. New York City Public Schools administers a school climate survey on an annual basis. Looking at several years of data, the study found that schools that were more than 90% minority saw decreases in student respect, increases in reported fighting, and increases in teacher-reported disorder (Eden 2017).

Such measures are generally opposed by teachers, who see such policies as an attack on their ability to properly control behavior in the classroom. A 2015 EducationNext poll found that only 18% of teachers supported “school district policies that prevent expelling or suspending black and Hispanic students at a higher rate than other students” compared with 57% who oppose such policies (Henderson, Peterson and West 2015). But would the requirement of proportionality result in widespread implementation of discipline quotas? We attempt to answer that question in our analysis below.

Analysis

In order to examine the potential impact of this regulation on school districts, we gathered data from the 10 largest school districts in every state. While gathering data from every district would obviously be preferable, we think that the information from large districts can represent a good proxy in this case, as larger districts are more likely to have significant shares of minority students than smaller and more rural ones. For states with a significant number of districts in jeopardy of being identified as having significant disproportionality in our analysis, a deeper dive may be warranted at the state level. It should be noted that we are using the most recent year of data available from the Civil Rights Data Collection (CRDC) of the Department of Education, which is from the 2014-15 school year. It is possible that subsequent years of data in individual states might lead to different determinations. One further caveat on our work here—states are only required to report RRTs for suspensions of 10 days or more, but readily available data from CRDC did not differentiate on the length of suspension. While we think it a reasonable

proposition that there would not be much variance in the rates of long and shorter term suspensions, this must be made explicit.

Using the formula above mentioned in the RRT section, we determined the number of districts that would be in violation of significant disproportionality regulations at varying RRT thresholds that are commonly used in states—2, 3, and 4 for African American and Hispanic students. For example, Kentucky and Virginia use a RRT of 3, Nebraska uses 4, and New Mexico is one of the few states for which an RRT was found that uses 5. Because federal regulations allow states to account for a reasonable minimum cell size, we chose to exclude districts with fewer than 10 students of the category of interest.

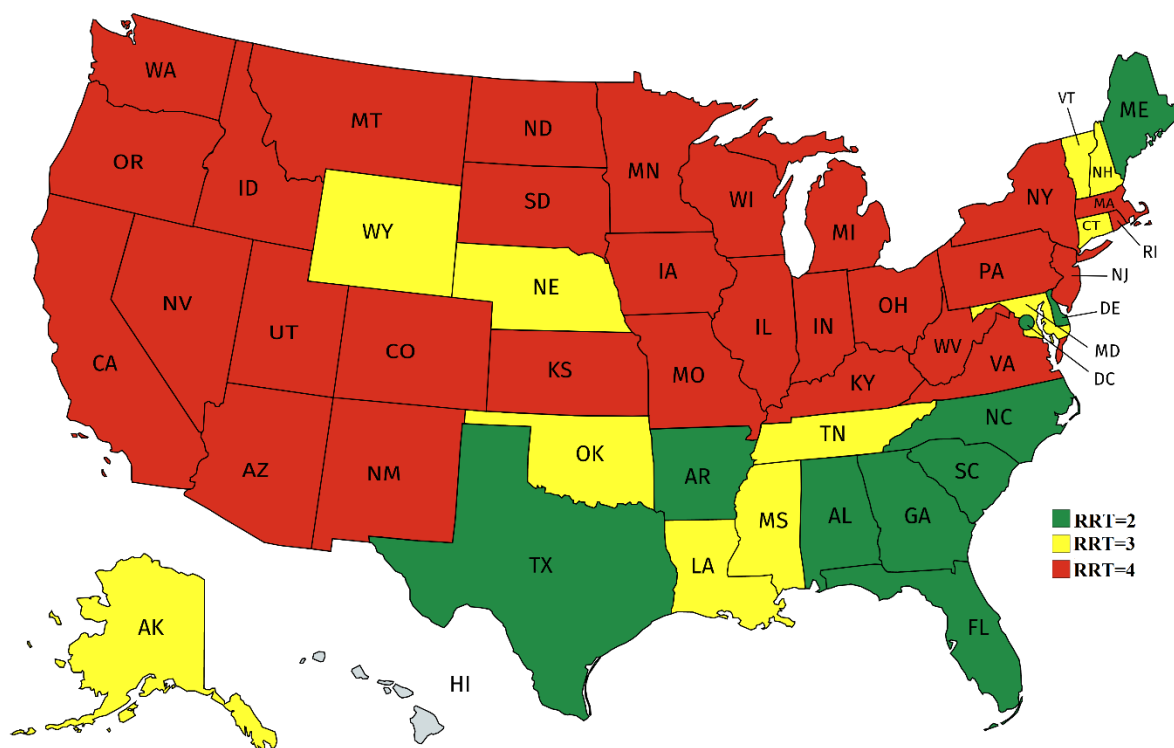
Results

Results: African American Students

Across the nation, there are a large number of districts that will likely have to implement suspension quotas depending on the threshold that the state decides on. The figure below presents the number of states that were found to have districts in violation at thresholds of 2, 3, and 4 with each color representing highest RRT at which the first district violation was found for African American students.

In general, southern states appear to be better prepared for lower RRTs than do northern and western states. Districts with problematic ratios at higher RRTs tend to have fewer African American students as a percentage of enrollment. The only state with no problematic districts identified at any RRT is Hawaii, which does not have school districts. Thus, this merely means that Hawaii does not have RRT issues at the state level. Twenty-nine states have problematic districts with an RRT set at the highest level of 4. Ten additional states have problematic districts with an RRT of 3, and a further 10 with an RRT of 2. A full list of districts found to have risk ratios higher than 2 can be found in the Appendix to this study.

States with Districts Identified as Significantly Disproportionate at Varying RRTs, African American Students



The results here are consistent with other studies in finding that African American students are suspended at higher rates than other racial groups. Many states would risk the implementation of racial quotas in certain districts at even seemingly high RRTs.

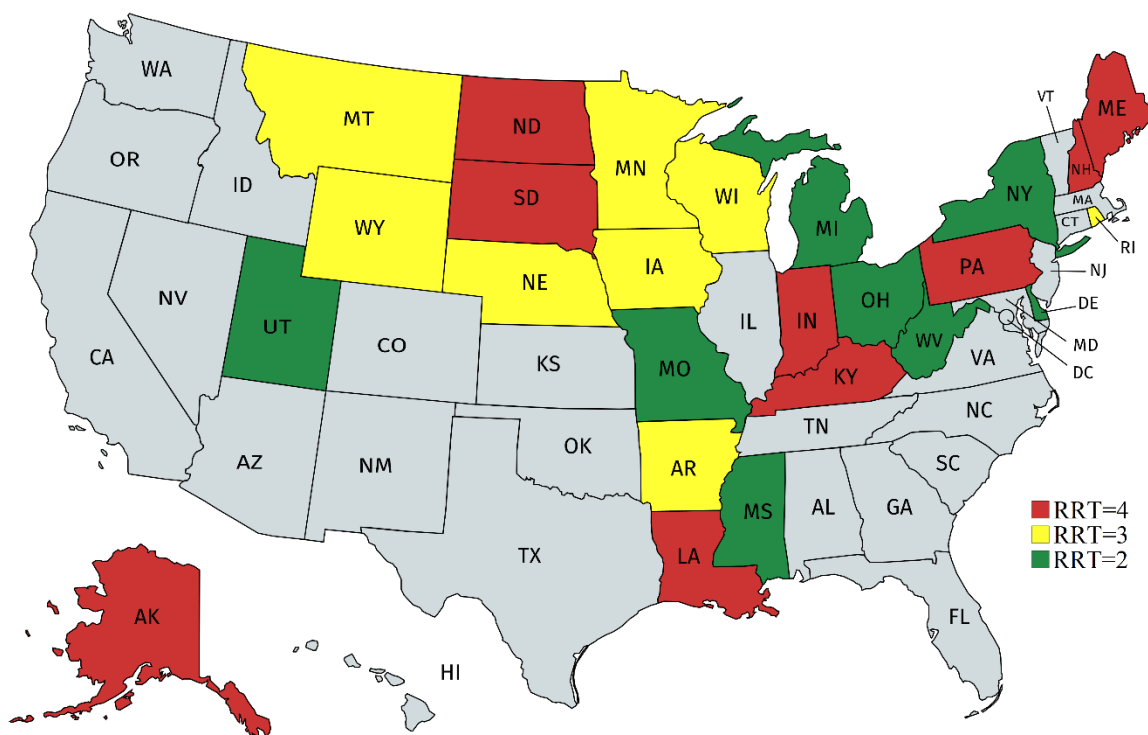
Results: Hispanic Students

It appears that far fewer states have problematic risk ratios when it comes to Hispanic students. Far fewer states cross even the lowest threshold, and those that do, in general, have fewer districts identified as problematic. Once again, the most problematic districts appear to be in states with fewer Hispanic students as a percentage of enrollment, with the highest relative risk ratios being found in the Midwest and Northeast. That said, districts in 25 states would still likely have to implement quotas on suspensions for Hispanic students if certain RRTs were adopted.

Some might argue that the dramatically fewer districts with problematic risk ratios for Hispanic students is suggestive evidence that there may be other factors that explain differences in

discipline rates for African American students, as Hispanic students would be likely to experience discrimination from racially-motivated teachers as well.

States with Districts Identified as Significantly Disproportionate at Varying RRTs, Hispanic Students



Comparing Rates for African American and Hispanic Students

If the story told by proponents of a racism explanation for different suspension rates is true, we might expect that suspension rates for different minority groups would look similar. While some groups could face greater levels of discrimination, substantial differences in suspension rates among minority groups undercuts – even it does not disprove – an assumption of pervasive prejudice. Our analysis shows substantial variation among groups traditionally regarded as “marginalized” by discrimination. The table below compares the average risk ratio for African American and Hispanic students in our sample of districts using a difference-of-means test.

Table 1. Difference in Mean RRT

Group	Mean RRT
African American Students	3.201
Hispanic Students	1.241
Difference	1.96***

*** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$

The Average risk ratio for African American students was 3.201, while for Hispanic students it was 1.241. Not only are African American students suspended at a significantly higher rate than white students, but also at a significantly higher rate than Hispanic students ($p < .01$). While the relatively similar rates of suspension for white and Hispanic students is not definitive proof that racism is not the key explanatory factor when significant disproportionality exists along racial lines, it does add to the evidence that something else entirely may be going on, including differences in the behavior of students on average.

Conclusion

RRTs, even at the highest thresholds we found that had thus far been implemented, are likely to cause problems for states when it comes to discipline for African American students. All of the states in our study with the exception of Hawaii had districts within their 10 largest that would be identified as having significant disproportionality at certain RRTs.

Given the damage that the implementation of quotas is likely to cause to the safety of students and teachers, it is incumbent on policymakers at both the state and national level to reconsider this policy. At the state level, RRTs should be set at as high a threshold as possible to avoid flagging a large number of districts where discipline disparities might well be explained by other means. Based on our analysis here, we would recommend a threshold of four or higher. At the federal level, the Department of Education should reconsider the implementation of this regulation *at all*. Polls show that the American people don't want the federal government in control of school-level discipline practices (Flanders 2019), and this is one important area where an administration that ostensibly supports federalism ought to get out of the way.

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Appendix Table 1. Districts with RRT>2, African American Students; 10 Largest Districts in Each State.

State	District	RRT	State	District	RRT
Alabama	Montgomery	2.042	Nebraska	Millard	3.701
Alabama	Huntsville	2.245	Nevada	Clark	2.689
Alabama	Mobile	2.265	Nevada	NYE	2.992
Alabama	Jefferson	2.283	Nevada	Washoe	4.670
Alabama	Madison	2.503	N Hampshire	Manchester	2.028
Alabama	Tuscaloosa	2.678	N Hampshire	Nashua	2.629
Alabama	Shelby	2.695	N Hampshire	Rochester	3.062
Alabama	Autauga	2.826	New Jersey	Trenton	2.127
Alaska	Anchorage	2.320	New Jersey	Jersey City	2.751
Alaska	Fairbanks	3.845	New Jersey	Elizabeth	2.854
Arizona	Casa Grande	2.443	New Jersey	Edison Township	3.153
Arizona	Agua Fria	2.499	New Jersey	Toms River Regional	3.791
Arizona	Avondale El	2.636	New Jersey	Passaic City	4.006
Arizona	Cartwright EL	2.836	New Mexico	Clovis Mun	2.578
Arizona	Chandler Unified	3.049	New Mexico	Santa Fe	2.769
Arizona	Alhambra EL	3.540	New Mexico	Hobbs Municipal	3.183
Arizona	Creighton El	4.919	New Mexico	Albuquerque	4.186
Arkansas	Fort Smith	2.217	New Mexico	Roswell Ind.	4.191
Arkansas	Fayetteville	2.268	New Mexico	Las Cruces	4.498
Arkansas	Springdale	2.808	New Mexico	Farmington Municipal	10.387
Arkansas	Cabot	2.870	New York	Brentwood Union Free	2.130
California	Corona-Norco Uni	2.081	New York	Wappingers Central	2.173
California	Elk Grove Uni	2.343	New York	Yonkers City	2.272
California	San Diego Uni	2.479	New York	New Rochelle City	2.351
California	Long Beach Uni	2.579	New York	New York City Public	2.532
California	Fresno Uni	2.626	New York	Newburgh City	2.627
California	Los Angeles Uni	4.433	New York	Williamsville Central	2.662
California	Capistrano Uni	4.665	New York	Sachem Central	4.070
California	San Fran Uni	5.716	N Carolina	Forsyth	2.045
Colorado	School Dist Nona 1	2.271	N Carolina	Union	2.234
Colorado	Cherry Creek	2.316	N Carolina	Charlotte-Mecklenburg	2.263
Colorado	Colorado Springs	2.452	N Carolina	Wake Cou.	2.519
Colorado	Adams 12	3.301	N Carolina	Durham	2.577

Colorado	Douglas Cou.	6.996	N Dakota	Minot	2.208
Colorado	Poudre	7.218	N Dakota	Fargo	3.944
Colorado	Boulder valley	7.452	N Dakota	Williston	7.517
Colorado	Jefferson Cou.	7.861	N Dakota	Bismarck	8.615
Connecticut	Stamford	2.210	Ohio	Hilliard	2.965
Connecticut	Danbury	2.941	Ohio	Lakota	3.237
Connecticut	Connecticut Tech	3.356	Ohio	Dublin	4.025
Connecticut	Norwalk	3.396	Oklahoma	Moore	2.321
Connecticut	Fairfield	3.530	Oklahoma	Broken Arrow	3.002
DC	District of Columbia	2.746	Oklahoma	Norman	3.044
Delaware	Capital School	2.201	Oregon	Portland	2.501
Delaware	Christina	2.287	Oregon	Gresham-Barlow	2.757
Delaware	Brandywine	2.369	Oregon	North Clackamas	3.088
Delaware	Red Clay	2.389	Oregon	Eugene	3.179
Delaware	Indian river	2.536	Oregon	Tigard-Tualatin	3.560
Delaware	Appoquinimink	2.759	Oregon	Hillsboro	3.707
Florida	Brevard	2.127	Oregon	Beaverton	4.939
Florida	Orange	2.165	Oregon	Medford	5.733
Florida	Duval	2.166	Oregon	Salem-Keizer	15.433
Florida	Lee	2.461	Pennsylvania	Philadelphia	2.042
Florida	Hillsborough	2.560	Pennsylvania	Upper Darby	2.078
Florida	Broward	2.635	Pennsylvania	Bethlehem	2.167
Florida	Palm Beach	2.638	Pennsylvania	North Penn	2.275
Florida	Pinellas	2.816	Pennsylvania	Central Bucks	2.438
Georgia	Atlanta	2.007	Pennsylvania	Downington	4.256
Georgia	Cobb	2.100	Rhode Is	East Providence	2.195
Georgia	Cherokee	2.268	Rhode Is	West Warwick	3.291
Georgia	Dekalb	2.275	Rhode Is	Coventry	3.547
Georgia	Forsyth	2.524	Rhode Is	Cumberland	3.547
Georgia	Fulton	2.717	Rhode Is	Cranston	4.775
Idaho	Boise Ind.	3.017	Rhode Is	Warwick	5.493
Idaho	Nona 2	8.734	S Carolina	Beaufort	2.177
Illinois	Chicago	2.235	S Carolina	Aiken	2.184
Illinois	Rockford	2.358	S Carolina	Charleston	2.204
Illinois	Plainfield	2.502	S Carolina	Lexington Cou. No 1	2.274
Illinois	Schaumburg	3.412	S Dakota	Sioux Falls	2.149
Illinois	Indian Prairie	4.888	S Dakota	Douglas	4.326
Illinois	U-46	5.162	Tennessee	Davidson Cou.	2.007
Illinois	CUSD 300	5.337	Tennessee	Knox Cou.	2.087
Indiana	Indianapolis Public	2.013	Tennessee	Wilson Cou.	2.577

Indiana	South Bend	2.063	Tennessee	Rutherford Cou.	2.711
Indiana	Hamilton	2.255	Tennessee	Sumner Cou.	2.853
Indiana	Evansville	2.495	Tennessee	Williamson Cou.	3.288
Indiana	Vigo Cou.	9.156	Tennessee	Hamilton Cou.	3.562
Iowa	Cedar Rapids Com.	2.207	Tennessee	Shelby Cou.	3.611
Iowa	Iowa City	3.316	Texas	Northside Ind.	2.034
Iowa	Sioux City	3.639	Texas	Katy Ind	2.211
Iowa	Dubuque	5.362	Texas	Cypress-Fairbank Ind	2.297
Iowa	Council Bluffs	5.369	Texas	Fort Bend Ind	2.429
Iowa	Ankeny	5.610	Texas	Dallas Ind	2.443
Kansas	Lawrence	2.003	Texas	Aldine Ind	2.452
Kansas	Shawnee	2.520	Texas	North East Ind	2.473
Kansas	Blue Valley	4.007	Texas	Fort Worth Ind	2.650
Kansas	Andover	4.511	Texas	Austin In	2.702
Kentucky	Fayette	2.210	Texas	Houston Ind	2.780
Kentucky	Jefferson	2.230	Utah	Salt Lake	2.975
Kentucky	Kenton	2.445	Utah	Canyons	3.912
Kentucky	Warren	2.780	Utah	Davis	3.994
Kentucky	Daviess	4.334	Utah	Alpine	4.248
Kentucky	Boone	5.617	Utah	Granite	4.724
Kentucky	Oldham	6.139	Utah	Weber	6.365
Louisiana	Jefferson Parish	2.134	Utah	Jordan	8.905
Louisiana	Calcasieu Parish	2.141	Utah	Provo	10.762
Louisiana	Bossier Parish	2.279	Utah	Washington	10.986
Louisiana	St Tammany Parish	2.357	Vermont	Burlington	2.108
Louisiana	Livingston Parish	3.020	Vermont	Mounth Anthony	2.833
Louisiana	Ascension Parish	3.880	Vermont	Colchester	2.848
Maine	Lewiston	2.077	Vermont	Milton	3.785
Maine	South Portland	2.228	Virginia	Virginia Beach	2.034
Maryland	Harford Cou.	2.117	Virginia	Henrico	2.086
Maryland	Frederick Cou.	2.468	Virginia	Farifax Cou.	2.372
Maryland	Montgomery Cou.	2.515	Virginia	Loudoun	4.116
Maryland	Carroll Cou.	3.086	Washington	Bellevue	2.089
Massachusetts	Lawrence	5.312	Washington	Seattle	2.268
Michigan	Grand Rapids	2.010	Washington	Kent	2.381
Michigan	Warren Consol.	2.100	Washington	Everett	2.527
Michigan	Chippewa Valley	2.151	Washington	Puyallup	5.380
Michigan	Rochester	2.658	Washington	Issaquah	6.915
Michigan	Utica	2.664	W Virginia	Kanawha	2.279
Michigan	Ann Arbor	3.629	W Virginia	Monongalia	3.256

Michigan	Dearborn	4.757	W Virginia	Wood Cou.	4.700
Michigan	Plymouth-Canton	5.003	W Virginia	Putnam	10.151
Minnesota	Eastern Carver Cou.	2.552	Wisconsin	Eau Claire	7.912
Minnesota	Duluth	3.108	Wisconsin	Racine	2.263
Minnesota	Eden Prairie	3.312	Wisconsin	Waukesha	2.446
Minnesota	Edina	4.569	Wisconsin	Madison Metro	2.610
Minnesota	Elk River	7.606	Wisconsin	Kenosha	3.135
Mississippi	Desoto	2.144	Wisconsin	Appleton	3.477
Mississippi	Rankin	2.163	Wisconsin	Green Bay	3.697
Mississippi	Jones	2.216	Wisconsin	Sheboygan	5.511
Mississippi	Lamar	2.700	Wyoming	Laramie No 1	2.165
Mississippi	Jackson Cona	3.373	Wyoming	Natrona No 1	3.895
Mississippi	Vicksburg	3.653			
Mississippi	Madison	3.784			
Missouri	Fort Zumwalt	2.112			
Missouri	Lee's Summit	2.375			
Missouri	Springfield R-XII	2.810			
Missouri	Parkway C-II	3.053			
Missouri	Rockwood R-VI	5.540			
Montana	Missoula	13.847			
Nebraska	Lincoln	2.278			
Nebraska	Papillion- La Vista	3.165			
Nebraska	Grand Island	3.358			

Appendix Table 2. Districts with RRT>2, Hispanic Students; 10 Largest Districts in Each State.

State	district	RRT	State	District	RRT
Alaska	Juneau	3.249	Montana	Butte El	3.042
Alaska	Matanuska	4.689	Nebraska	Elkhorn	3.772
Arkansas	N. Little Rock	3.578	N. Hampshire	Rochester	2.064
Delaware	Smyrna	2.000	N. Hampshire	Dover	3.463
Indiana	Hamilton	2.287	N. Hampshire	Merrimack	4.289
Indiana	Evansville	2.353	N. Hampshire	Derry	6.315
Indiana	Carmel	4.575	N. York	Williamsville Central	2.476
Iowa	Ankeny	2.937	N. Dakota	West Fargo	2.751
Iowa	Linn-Mar	3.810	N. Dakota	Jamestown	3.309
Kentucky	Kenton	2.471	N. Dakota	Grand Forks	7.129
Kentucky	Bullitt	4.434	N. Dakota	Williston	7.554
Kentucky	Madison	5.452	Ohio	Westerville	2.037
Louisiana	Calcasieu Par.	3.261	Ohio	Akron	2.037
Louisiana	Rapides Parish	6.495	Ohio	Hilliard	2.814
Maine	Lewiston	4.673	Pennsylvania	Downington	2.581
Maine	Sanford School	6.007	Pennsylvania	N. Penn	4.113
Michigan	Utica	2.155	Pennsylvania	Reading	43.803
Michigan	Dearborn	2.402	Rhode Island	N. Kingstown	3.321
Minnesota	Forest Lake	2.394	South Dakota	Rapid City	2.083
Minnesota	Anoka-Hennepin	2.453	South Dakota	Brookings	2.932
Minnesota	Elk River	2.808	South Dakota	Douglas	6.906
Minnesota	Duluth	3.857	Utah	Alpine	2.091
Mississippi	Jackson Co.	2.273	West Virginia	Berkeley	2.204
Mississippi	Tupelo	2.403	Wisconsin	Eau Claire	3.418
Missouri	Ft. Zumwalt	2.201	Wyoming	Sheridan No. 2	3.035
Montana	Great Falls	2.178			
Montana	Helena	2.428			