

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION

SONNIE WELLINGTON HEREFORD,)	
IV., et al.,)	
)	
Plaintiffs,)	
)	
AND)	CV-63-MHH-109-NE
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff-Intervenor,)	
)	
v.)	
)	
HUNTSVILLE BOARD OF)	
EDUCATION, et al.,)	
)	
Defendants.)	

Affidavit of George Smith

Experience

1. I am a Data Strategist for the Huntsville City Board of Education (hereinafter, the “District”), and have served in this position since August of 2014. My work with the District consists of managing and analyzing student information to guide decision making of District leaders. I also provide extensive support in the form of statistical analysis for a variety of Consent Order (Doc. 450) related projects, including the District Self-Monitoring process.

2. I earned a Ph. D. in May 2014 and a Master of Science degree in December 2010, both from the University of Michigan in the area of Social Psychology. I earned a Bachelor of Science in May of 2008 from the University of Florida, also in Psychology.
3. As part of my education and work experience, I am proficient in SPSS, Microsoft Excel, and Advanced Statistical Methods. I regularly make use of statistical models to interpret student data including academic achievement, discipline, and transportation. The District uses these models to help set targets for improvement consistent with the requirements of the Consent Order. I have attached a copy of my Curriculum Vitae hereto as Exhibit 1.
4. I have also helped the District analyze the student transportation data in support of the Joint Motion for Partial Unitary Status as to Transportation.

Student Transportation Data

5. My analysis of student transportation data consisted of two components.
6. First, I compared the percentage of students eligible for transportation, by race, to the percentage of total student enrollment by race for each school year. The eligible student rider data that I analyzed was prepared by Matt Sachs of Cooperative Strategies.

7. I reviewed eligibility data for the 2013-14, 2014-15, 2015-16, 2016-17, 2017-18, and 2018-19 school years.
8. Second, I reviewed the actual student rider data to examine a number of metrics, disaggregated by race, including: actual rider population; travel duration; and bus usage.
9. The actual student rider data that I analyzed was prepared by Scott Gillies, the District's current Transportation Coordinator, Apple Bus Company, and Durham School Services. As I understand it, the students on the list I received are only the students who the District believes actually rode the bus during the 2015-16, 2016-17, 2017-18, and 2018-19 school years.
10. In addition to the eligible and actual rider data discussed above, I also reviewed the State Transportation Report prepared by Scott Gillies for the 2015-16, 2016-17, 2017-18, and 2018-19 school years. I used these state reports to determine the travel time for each bus.

Statistical Findings: Eligible Student Rider Data

11. I was tasked with determining whether the District's transportation eligibility policies discriminated against Black students.
12. I created two different tables to help with my analysis. The first, pictured below and attached hereto as Exhibit 2, shows the following:

- a. The first column shows the school year.
- b. The second, third, and fourth columns contain the number of Black, White, and Other students in the District.
- c. The fifth, sixth, and seventh columns contain the number of Black, White, and Other students who are eligible for transportation under the 2-Mile Rule, 5-Mile Rule, hazard boundaries, and special circumstance boundaries.
- d. The eighth, ninth, and tenth columns show the percentage of students who are eligible for transportation, by race.

Bus Eligibility									
School Year	Total Black Students in the District	Total White Students in the District	Total Other Students in the District	Eligible Black Students	Eligible White Students	Eligible Other Students	% of Total Black Eligible	% of Total White Eligible	% of Total Other Eligible
13-14	9,385	10,064	4,080	3,374	3,506	1,029	36%	35%	25%
14-15	9,291	9,877	4,451	3,199	3,437	1,230	34%	35%	28%
15-16	9,622	9,643	4,758	3,839	3,370	1,451	40%	35%	30%
16-17	9,683	9,453	4,979	3,529	3,329	1,877	36%	35%	38%
17-18	9,534	9,315	5,133	3,378	3,312	1,970	35%	36%	38%
18-19	9,400	9,130	5,404	3,282	3,305	2,071	35%	36%	38%

13. The above table shows that the percentage of Black students eligible for bus transportation is similar to the percentage of White students eligible for bus transportation. This data shows that Black students have similar access to bus services compared to White students.

14. Additionally, based on my knowledge of the District's student demographics, I can say that the racial makeup of Black and White eligible riders approximates the racial makeup of the District for all school years shown in the table.
15. The second table, pictured below and attached hereto as Exhibit 3, shows the following:
 - a. The first column shows the school year.
 - b. The second, third, and fourth columns contain the number of Black, White, and Other students who are eligible for transportation.
 - c. The fifth, sixth, and seventh columns contain the number of Black, White, and Other students who are eligible for transportation under the hazard boundary and special circumstance boundary policies. The 2-Mile and 5-Mile Rule policies are not included in these columns.
 - d. The eighth, ninth, and tenth columns show the percentage of eligible students who are eligible under the hazard boundary and special circumstance boundary policies only, by race.

Hazard Boundary (HB) and Special Circumstance (SCB) Boundary Eligibility									
School Year	Eligible Black Students	Eligible White Students	Eligible Other Students	Black Students Eligible by HB and SCB Policies	White Students Eligible by HB and SCB Policies	Other Students Eligible by HB and SCB Policies	% of Black Eligible by HB and SCB Policies	% of White Eligible by HB and SCB Policies	% of Other Eligible by HB and SCB Policies
13-14	3,374	3,506	1,029	958	173	159	28%	5%	15%
14-15	3,199	3,437	1,230	834	182	210	26%	5%	17%
15-16	3,839	3,370	1,451	1,001	182	230	26%	5%	16%
16-17	3,529	3,329	1,877	982	164	318	28%	5%	17%
17-18	3,378	3,312	1,970	902	160	333	27%	5%	17%
18-19	3,282	3,305	2,071	912	169	324	28%	5%	16%

16. The 2-Mile Rule and 5-Mile Rule are the default for transportation eligibility. However, many students gain eligibility via the District’s discretionary hazard and special circumstance boundaries. In comparison to White students, a higher percentage of Black students are deemed eligible for bus transportation due to the hazard and special circumstances boundaries. In other words, the discretionary transportation eligibility policies tend to benefit Black students. The table shown above demonstrates this: 26-28% of eligible Black students benefit from the discretionary policies as opposed to 5% of eligible White students.

17. For the reasons stated above, I believe that the District’s eligibility data supports the position that the District’s transportation policies provide similar access to bus transportation for White and Black students.

Statistical Findings: Actual Student Rider Data

18. I was also tasked with determining whether the District’s actual rider data shows that Black students are more burdened by the transportation plan than White students. To do this, I analyzed bus travel durations and bus usage, disaggregated by race and school year.
19. To create the tables, I used analysis of variance (“ANOVA”) because the dependent variable was continuous in nature (average route time) and the independent variable was categorical (race of each student). I then completed pairwise comparisons using a least significant difference method to determine specific relationships between each group.
20. All route time information was pulled from State Transportation Reports prepared by Scott Gillies for the 2015-16, 2016-17, 2017-18, and 2018-19 school years.
21. In my review, I noticed that some buses run multiple routes in the morning or afternoon. For example, a bus may run an elementary route in the early morning, drop elementary students off, and then run a second route in the morning for another school with a later start time. For the buses that ran multiple routes in either the morning or afternoon, route times and distances were averaged.

22. In addition, I analyzed how often students were on the same bus for both the morning and afternoon routes. I determined that students were on the same morning and afternoon routes 98% of the time in 2015-16, 96% of the time in 2016-17, 95% of the time in 2017-18, and 71% of the time in 2018-19. Because of the increasing discrepancy in morning and afternoon routes, rather than use one route at the exclusion of the other, I averaged the morning and afternoon data for each student, leaving one average time and distance value for each student.
23. My analysis excluded any buses that solely served Magnet and/or M-to-M transfer students. I identified Magnet and M-to-M buses by using information I received from Scott Gillies. I determined that, by excluding Magnet and M-to-M buses, my analysis excluded 13% of actual riders in 2015-16, 16% in 2016-17, 16% in 2017-18, and 19% in 2018-19.
24. Race was added into my analysis by using student ID numbers to pull race information from INOW, the District's student information database.
25. My analysis produced the four tables below, attached hereto as Exhibits 4, 5, 6, and 7. The tables show the following:
 - a. The first column shows the race as Black, White, or Other.
 - b. The second column shows the number of riders of a particular race.

- c. The third column shows the average route time for students of a particular race. The number in parentheses shows the standard deviation of route times.
- d. The last column answers the question of whether the route times for Black riders were significantly longer than the route times for White and Other riders. For the Black student row, this cell is blank. The number in parentheses is the p-value. For the analysis to be significant (results not due to chance or error), the p-value should be less than .05.
- e. The bottom row answers the question of whether the overall model was significant and provides the p-value. For the pairwise comparisons to be valid, the overall model must be significant (p-value less than .05).

2015-16 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	1,574	49.2 (21.4)	---
White	1,522	51.3 (20.3)	White Time Longer ($p = .006$)
Other	813	49.6 (20.7)	No Difference (<i>ns</i>)
Analysis is significant, $F(2, 3909) = 4.01, p = .018$			

2016-17 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2,364	50.8 (23.6)	---
White	1,703	55.8 (18.9)	White Time Longer ($p < .001$)
Other	1,328	49.7 (20.7)	No Difference (<i>ns</i>)
Analysis is significant, $F(2, 5395) = 37.93, p < .001$			

2017-18 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2,522	44.1 (19.8)	---
White	1,700	53.3 (20.6)	White Time Longer ($p < .001$)
Other	1,384	47.8 (20.6)	Other Time Longer ($p < .001$)
Analysis is significant, $F(2, 5606) = 103.66, p < .001$			

2018-19 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2,480	46.7 (21.1)	---
White	1,611	47.8 (17.3)	No Difference (<i>ns</i>)
Other	1,454	44.3 (19.3)	Other Time Shorter ($p < .001$)
Analysis is significant, $F(2, 5545) = 15.71, p < .001$			

26. The model for each school year was significant. Pairwise comparisons determined that the average route time for White students was longer than the average route time for Black students in 2015-16, 2016-17, and 2017-18. In 2018-19, there was no significant difference in route times between White and Black students. The difference in average route times between Black students and Other students fluctuate from year to year with no consistent pattern.

27. The four tables, considered together, show that the transportation burden on Black students is not higher than White students as measured by time on bus. In other words, the District does not assign Black students to longer bus routes than their White student counterparts. As a caveat, the above analysis considers only the route time and not actual travel time for each student. That information is not available, so I cannot speak to average travel time per student. However, I do believe that average route time is instructive and pertinent to the issue before the Court.
28. After completing that analysis, I was concerned that the shorter route times for Black students could be a product of the geographic location of the students. In other words, shorter route times could be created by high concentrations of Black students living closer to a school or living in high density housing such as apartment communities.
29. Thus, I reexamined the data using an analysis of covariance (“ANCOVA”) which allowed me to control for distance and better isolate the relationship between racial subgroup and route duration. Put differently, I assumed that all routes ran an equal distance and asked if that would create different average route times between each racial subgroup.

30. The table below, attached hereto as Exhibit 8, shows the results of my analysis and shows the following:
- a. The first column shows the school year.
 - b. The second, third, and fourth columns contain the average route time for Black, White, and Other students when holding the route distance variable constant.
 - c. The fifth column answers the questions of whether differences in route times was significant between Black, White, and Other bus riders.

Year	Black Avg RT	White Avg RT	Other Avg RT	Significant Differences with Black Average Route Time?
2015-16	50.8	48.8	51.2	Black Time Longer Than White Time; No Difference with Other Time
2016-17	51.8	52.6	51.9	White Time Longer Than Black Time; No Difference with Other Time
2017-18	45.9	51.2	47.3	White and Other Time Longer Than Black Time
2018-19	46.8	46.6	45.3	No Difference with White Time; Black Time Longer Than Other Time
Avg RT = Average route time in minutes; means presented are adjusted for the ANCOVA analysis; sample sizes are equivalent to sample sizes in the ANOVA analyses				

31. I concluded that, apart from the 2015-16 school year, the average route time for Black students was shorter or no different than the average route time for White students, controlling for distance transported.
32. Based on the above analysis, there is no evidence of a systematic or consistent burden placed on Black students in terms of route times.

33. Next, I analyzed data to determine what percentage of eligible riders were riding the bus. The table below, attached hereto as Exhibit 9, contains bus usage data by race and shows the following:

- a. The first column shows the school year.
- b. The second, third, and fourth columns contain the number of Black, White, and Other students eligible for transportation.
- c. The fifth, sixth, and seventh columns contain the number of Black, White, and Other of the eligible students who use the District’s transportation.
- d. The eighth, ninth, and tenth columns show the percentage of Black, White, and Other eligible students who use the District’s transportation.

Bus Usage Year-to-Year									
School Year	Eligible Black Students	Eligible White Students	Eligible Other Students	Actual Black Riders	Actual White Riders	Actual Other Riders	% of Eligible Black Who Ride	% of Eligible White Who Ride	% of Eligible Other Who Ride
15-16	3,839	3,370	1,451	1,574	1,522	813	41%	45%	56%
16-17	3,529	3,329	1,877	2,364	1,703	1,328	67%	51%	71%
17-18	3,378	3,312	1,970	2,522	1,700	1,384	75%	51%	70%
18-19	3,282	3,305	2,071	2,480	1,611	1,454	76%	49%	70%

34. The above table shows that bus rider usage varies year over year. In more recent years, usage rates have been higher for Black and Other students than for White students.
35. The bus usage table neither supports nor contradicts the position that the District's transportation plan is not discriminatory against Black students.

Conclusions

36. Based on my review and analysis of the data that I was provided, I do not have evidence of discriminatory practices on the part of the District against Black students in bus eligibility, route duration, or usage.
37. The percentages of students eligible for transportation is similar to the racial percentages of the District as a whole, which suggests that the District's policies are not discriminatory. In fact, based on the data that I was provided, the District's transportation policies sometimes favor Black students.
38. Based on my analysis of bus route times using the data that I was provided, it is my opinion that the transportation burden on Black students is not higher than White students as measured by total route time.

39. In sum, the District’s transportation plans do not burden Black students more than White students in terms of route times, bus eligibility, or bus usage based on the data I was provided.

FURTHER AFFIANT SAYETH NAUGHT.

GEORGE SMITH

STATE OF _____)
COUNTY OF _____)

SWORN TO AND SUBSCRIBED BEFORE ME this the _____ day of _____, 2019.

Notary Public
My Commission Expires: _____

EXHIBIT

1

George C. Smith

9410 Valley Ln SE
Huntsville, AL 35803

gsmith426@gmail.com
(901) 237-1885

EDUCATION

University of Michigan, Ann Arbor, Ph. D., May 2014

Dissertation: *Framing Experienced Difficulty and Uncertainty to Boost Academic Motivation*

Committee: Dr. Daphna Oyserman (Chair), Dr. Phoebe Ellsworth, Dr. Norbert Schwarz, Dr. Priti Shah, Dr. Allison Earl

Concentration: Social Psychology

University of Michigan, Ann Arbor, Master of Science, December 2010

Master's Thesis: *Yes we can! Cuing effort with Obama*

Advisor: Dr. Daphna Oyserman

Concentration: Social Psychology

University of Florida, Bachelor of Science, May 2008

Major: Psychology

Minor: Spanish

Overall GPA: 4.0/4.0

EMPLOYMENT/EXPERIENCE

Data Strategist, August 2014 – present

Assessment and Accountability, Huntsville City Schools; Huntsville, AL

Supervisor: Dr. Cathy McNeal

- Manage and analyze information from multiple data sources to guide the decision making of district leaders with a focus on student outcomes
- Analyze, synthesize, and report student test data from local and state testing
- Maintain student information database for local and state reporting purposes
- Evaluate and make recommendations on various interventions and programs
- Major projects include High School Graduation Tracker and Predictor, Department of Justice District Self-Monitoring, Site Data Reviews, PreK Effectiveness Analysis, Projected Enrollment, Future Indicators of Success (more information available upon request)

Research Intern, on-site May 2013 – August 2013, off-site until December 2014

Educational Testing Services, Princeton, NJ

Supervisor: Dr. Jeremy Burrus & Dr. Richard D. Roberts

- Worked on projects focusing on Cross-Cultural Competence in collaboration with the Army Research Institute
- Developed and researched novel ways to measure cross-cultural competence in U. S. Soldiers

- Collected, analyzed, and presented data that focused on integrating social psychological phenomenon with existing work on cross-cultural competence

Graduate Teaching Consultant, January 2012 – May 2014

Center for Research on Learning and Teaching, University of Michigan

- Observe graduate student instructors in various disciplines and collect performance feedback from students
- Provide teaching feedback, advice, and resources; problem-solve classroom issues with instructors
- Consult on and interpret student feedback with instructors

Adjunct Lecturer, January 2012 – December 2012

Eastern Michigan University

- Develop and teach a course covering a diverse set of topics encompassing the field of Psychology, including the history, methods and techniques used, and major sub-fields within the discipline
- Lecture 80+ students bi-weekly; create and administer quizzes, tests, and other assignments; create lectures; assign grades
- Meet with students one-on-one; answer questions, clarify and expand material

Graduate Student Instructor, see dates below

University of Michigan

Graduate Student Instructor for courses under various professors; duties included leading weekly discussion sections, presenting new material to supplement lectures, conducting in-class activities, clarifying material and answering questions, grading assignments and quizzes

Courses included:

- Introduction to Social Psychology, Fall 2013; Dr. Allison Earl
- Self and Motivation, Winter 2011; Dr. Daphna Oyserman,
- Violence in the Media, Fall 2010; Dr. Rowell Huesmann
- Violence in the Media, Winter 2010; Dr. Brad J. Bushman
- Introduction to Psychology, Fall 2009; Dr. Colleen Seifert
- Methodological Issues in Quantitative Research on Race and Ethnicity, Summer 2009; Dr. Philip Bowman

School to Jobs Intervention Leader, May 2009 – June 2009; September 2010 – December 2010

Romulus Middle School, Romulus, Michigan

School to Jobs intervention (Oyserman et al., 2002) focuses on enhancing youth's abilities to imagine themselves as successful adults and connecting these future images to current school involvement

- Co-lead sessions for 2 classes of 30 7th and 8th graders
- Prepared materials and activities for the class; evaluated the effectiveness of the program
- Worked one-on-one and in group settings with students to help them achieve the goals of the program

SKILLS

Proficient in SPSS, Excel, Advanced Statistical Methods, SQL Server, Qualtrics, Word, Powerpoint, Tableau; Experience with Renaissance Learning Products, ACT Products, Schoolnet and Other Pearson Products

PUBLICATIONS

Oyserman, D., Novin, S., Smith, G. C., Elmore, K., & Nurra, C. (under review). From difficulty to importance: Interpretation of experienced difficulty matters for identity, motivation and performance. *Journal of Personality and Social Psychology*.

Elmore, K., Oyserman, D., Smith, G., & Novin, S. (2016). When the going gets tough: Implications of reactance for interpretations of experienced difficulty in the classroom. *AERA Open*, 2(3), 1–11.

Smith, G. C. & Oyserman, D. (2015). Just not worth my time? Experienced difficulty and time investment. *Social Cognition*, 33, 85-103.

Landau, M., Oyserman, D., Keefer, L., & Smith, G. C. (2014). The college journey and academic engagement: How metaphor use enhances identity-based motivation. *Journal of Personality and Social Psychology*, 106, 679-698.

Oyserman, D., Smith, G. C., & Elmore, K. (2014). Identity-based motivation: Implications for health and health disparities. *Journal of Social Issues*, 70, 206-225.

Smith, G. C., James, L., Varnum, M., & Oyserman, D. (2014) Give up or get going? Productive uncertainty in uncertain times. *Self and Identity*, 13, 681-700.

Oyserman, D., Elmore, K., & Smith, G. (2012). Self, self-concept, and identity. In M. Leary & J. Tangney (Eds.), *Handbook of Self and Identity*, 2nd Edition (pp.69-104). New York, NY: Guilford Press.

Smith, G. C. & Oyserman, D. (2011). Yes we can! Cuing effort with Obama. *Unpublished Manuscript*.

*A list of professional presentations is available upon request

HONORS/AWARDS

Strategic Data Project Data Fellow, Center for Education Policy Research, Harvard University, May 2014 – August 2016
Daniel Katz Dissertation Fellowship, April 2013

National Science Foundation Graduate Research Fellowship, April 2010
Honorable Mention, National Science Foundation Fellowship, April 2009
Honorable Mention, Ford Foundation Diversity Fellowship, April 2009
College of Literature, Science, and the Arts Outstanding Graduate Student Instructor Nominee,
November 2010, 2011, 2012
Patricia Gurin Research Award, September 2009
College of Liberal Arts and Sciences Four-Year Scholar, University of Florida, May 2008
Phi Beta Kappa Honor Society, April 2007

COMMITTEE WORK & PROFESSIONAL GROUP MEMBERSHIPS

Behavioral Learning Network, Huntsville City Schools, March 2016 – present
Department of Justice Self-Monitoring Review Committee, Huntsville City Schools, September
2015 – present
Departmental Associate, University of Michigan, September 2011 – May 2012
Admissions Committee, University of Michigan, December 2010 – April 2012
Division 45 Member, American Psychological Association, April 2010 – present
Society for Personality and Social Psychology Member, December 2009 – present

***References available upon request**

EXHIBIT

2

Bus Eligibility

School Year	Total Black Students In the District	Total White Students In the District	Total Other Students In the District	Eligible Black Students	Eligible White Students	Eligible Other Students	% of Total Black Eligible	% of Total White Eligible	% of Total Other Eligible
2013-14	9385	10064	4080	3374	3506	1029	36%	35%	25%
2014-15	9291	9877	4451	3199	3437	1230	34%	35%	28%
2015-16	9622	9643	4758	3839	3370	1451	40%	35%	30%
2016-17	9683	9453	4979	3529	3329	1877	36%	35%	38%
2017-18	9534	9315	5133	3378	3312	1970	35%	36%	38%
2018-19	9400	9130	5404	3282	3305	2071	35%	36%	38%

EXHIBIT

3

Hazard Boundary (HB) and Special Circumstance (SCB) Boundary Eligibility

School Year	Eligible Black Students	Eligible White Students	Eligible Other Students	Black Students Eligible By HB and SCB Policies	White Students Eligible By HB and SCB Policies	Other Students Eligible By HB and SCB Policies	% of Black Eligible by HB and SCB Policies	% of White Eligible by HB and SCB Policies	% of Other Eligible by HB and SCB Policies
2013-14	3374	3506	1029	958	173	159	28%	5%	15%
2014-15	3199	3437	1230	834	182	210	26%	5%	17%
2015-16	3839	3370	1451	1001	182	230	26%	5%	16%
2016-17	3529	3329	1877	982	164	318	28%	5%	17%
2017-18	3378	3312	1970	902	160	333	27%	5%	17%
2018-19	3282	3305	2071	912	169	324	28%	5%	16%

EXHIBIT

4

2015-16 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	1574	49.2 (21.4)	---
White	1522	51.3 (20.3)	White Time Longer ($p = .006$)
Other	813	49.6 (20.7)	No Difference ($p > .6$)
Analysis is significant, $F(2, 3909) = 4.01, p = .018$			

EXHIBIT

5

2016-17 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2364	50.8 (23.6)	---
White	1703	55.8 (18.9)	White Time Longer ($p < .001$)
Other	1328	49.7 (20.7)	No Difference ($p > .1$)
Analysis is significant, $F(2, 5395) = 37.93, p < .001$			

EXHIBIT

6

2017-18 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2522	44.1 (19.8)	---
White	1700	53.3 (20.6)	White Time Longer ($p < .001$)
Other	1384	47.8 (20.6)	Other Time Longer ($p < .001$)
Analysis is significant, $F(2, 5606) = 103.66, p < .001$			

EXHIBIT

7

2018-19 Actual Rider Data			
Group	# of Riders	Average Route Time in Minutes (Standard Deviation)	Significantly Different from Black Route Time?
Black	2480	46.7 (21.1)	---
White	1611	47.8 (17.3)	No Difference ($p > .4$)
Other	1454	44.3 (19.3)	Other Time Shorter ($p < .001$)
Analysis is significant, $F(2, 5545) = 15.71, p < .001$			

EXHIBIT

8

Year	Black Avg RT	White Avg RT	Other Avg RT	Significant Differences?
2015-16	50.8	48.8	51.2	Black Time Longer Than White Time; No Difference with Other Time
2016-17	51.8	52.6	51.9	White Time Longer Than Black Time; No Difference with Other Time
2017-18	45.9	51.2	47.3	White and Other Time Longer Than Black Time
2018-19	46.8	46.6	45.3	No Difference with White Time; Black Time Longer Than Other Time
Avg RT = Average route time in minutes; means presented are adjusted for the ANCOVA analysis; sample sizes are equivalent to sample sizes in the ANOVA analyses				

EXHIBIT

9

Bus Usage Year-to-Year

School Year	Eligible Black Students	Eligible White Students	Eligible Other Students	Actual Black Riders	Actual White Riders	Actual Other Riders	% of Eligible Black Who Ride	% of Eligible White Who Ride	% of Eligible Other Who Ride
15-16	3,839	3,370	1,451	1,574	1,522	813	41%	45%	56%
16-17	3,529	3,329	1,877	2,364	1,703	1,328	67%	51%	71%
17-18	3,378	3,312	1,970	2,522	1,700	1,384	75%	51%	70%
18-19	3,282	3,305	2,071	2,480	1,611	1,454	76%	49%	70%