

Comprehensive Planning Committee-Administrative Guidelines for Equity

Introduction

In PSD, we believe that every child, every day deserves to experience academic success and belonging. In all aspects of our system, we strive to create and align structures that serve this end. We are not unlike school systems across the country where disproportionate outcomes persist for populations who have been historically marginalized. In an effort to disrupt these disproportionalities, we have aligned the work of our strategic plan to center equity at its foundation.

As we look beyond the strategic plan initiatives, we must also examine other systems and structures that continue historic disproportionalities. The following criteria are intended to guide the Comprehensive Planning Committee (CPC) — which primarily studies district facilities and enrollment — as it identifies areas of expansion and contraction for buildings. These equity-focused measures ensure that closure and consolidation decisions are grounded in data, community voice, and a commitment to mitigating harm for our most vulnerable students.

How to Use This Document

This document is intended to guide — not replace — the committee's judgment. The criteria below are organized by tending to people first, educational programming, and then finances, demographics, and facilities. This sequencing reflects the committee's direction that decisions be human-centered, beginning with the impact on students, families, and staff before turning to physical or financial considerations.

Recommended process: (1) CPC names candidate schools using existing enrollment/facilities data. (2) CPC develops consolidation/closure proposals. (3) A small equity review subcommittee in partnership with CPC reviews proposals using this document as guidance, centering the question: Who is most impacted and how do we mitigate harm? (4) Findings are shared before a final decision is made by the Board.

Key questions the committee should be able to answer for each proposal:

- How does this proposal create the least harm for the most vulnerable students and families?
- What is the estimated mitigation cost — the additional investment needed to support displaced students equitably at their new school?
- How does the proposal affect racial and socioeconomic integration across the district?
- What community engagement process will be used along the way to visibly shape the decision?

Definitions

Educational Equity

Exists when all students have access to the resources and opportunities they need to be college-, career-, and community-ready. Equity work includes actively identifying and addressing discrimination and disparities, removing barriers, and implementing inclusive policies and practices for all students and staff.

Equity Success	Equity work will be successful when student and staff identities — including race, color, religion, national origin, sex, gender identity, sexual orientation, age, disability, and other socioculturally significant factors — are not predictors of outcomes.
Mitigation Cost	The additional investment required to ensure students displaced by a closure or consolidation receive equitable access to programs, services, transportation, and supports at their receiving school. This should be estimated for each proposal.
Consolidation vs. Closure	Consolidation merges two school communities; closure ends a school entirely. These carry different community impacts and should be evaluated distinctly. Where possible, consolidation is preferred over closure as it preserves continuity for more families.

People — Student, Family & Staff Impact

This criterion examines the direct human impact of a closure or consolidation decision. The central question is: who bears the burden, and is that burden equitably distributed?

Student Demographics & Disproportionality

- Document the racial/ethnic composition, FRL rate, English Learner population, students with disabilities, youth that are in McKinney-Vento/foster situations, and 504/IEP counts at each school under consideration.
- Review how each proposal affects racial and socioeconomic integration across the district as a whole — does it increase or decrease segregation?

Community & Family Context

- Determine whether the school serves as a neighborhood anchor in a lower-income or geographically isolated community and how community cohesion needs to be tended.
- Assess whether co-located community services (health, mental health, food, after-school) would be displaced and whether comparable services are accessible.
- Consider the history of prior closures or resource inequities in the affected community — communities of color may have historically experienced repeated disinvestment, and this context must inform the process.

Staff Impact

- Review plans to support staff transition, within applicable labor laws and the employee agreement, including how receiving schools may reflect or improve upon the diversity of the school's workforce or may represent important cultural and linguistic assets.

Transition & Mitigation Planning

- For each proposal, estimate the mitigation cost: what additional investment is required for displaced students to receive equitable access to supports, programming, and services at their new school?
- Identify transition supports to be provided, including counseling, family communication in home languages, student orientation, and continuity of IEP/504 services.

- For each newly consolidated school: build engagement and input for displaced families/students to have a voice in how the new school climate/culture/logistics will be built to meet the needs of all students.

Programming — Equitable Access to Opportunity

This criterion examines access to enrichment, intervention, and specialized programming. Students at affected schools should not experience a net loss of programming quality or availability as a result of closure or consolidation decisions.

Arts, Music, PE & Enrichment

- Assess the weekly frequency and duration of access to art, music, and PE by school site.
- At secondary sites, assess the range of electives available, and examine differences by socioeconomics and demographics in available enrichment programming provided by PSD staff.

Specialized & Intensive Programming

- Examine access to center-based programming for students who qualify, prioritizing plans that keep students within a single feeder system and minimize long-distance transportation from home to school.
- Analyze whether staff within IS center-based or LCE programs are highly qualified, and whether disparities exist between programs at more and less affluent sites.

Intervention & Mental Health Supports

- Examine ratios of mental health staff to students by site, with attention to whether schools with higher concentrations of risk factors have proportionally more support.
- Examine the ratio of intervention staff to READ plans by site, and the reading certifications held by intervention staff at each site.

After-School & Extended Learning (K–5)

- Assess the number and quality of after-school enrichment programs available to students, and whether access is equitable across income levels.
- For each proposal, assess how after-school programming may need to be expanded at the receiving school.
 - For each proposal, analyze anticipated Free Lunch rates in the newly formed buildings to predict where Title I funds might flow post consolidation.

Gifted & Talented Access

- Analyze models for GT programming by site, which may range from consultation, differentiated instruction, acceleration, and dedicated staffing.
- Analyze how gifted identification reflects district demographics, and whether consolidation presents an opportunity to improve equity of access.

Proximity — Transportation & Access

This criterion examines geographical and temporal barriers students and families face in accessing education. Transportation equity is not only about buses — it includes whether families can participate in school life and whether students can access after-school programming.

Distance & Travel Time

- Analyze the disparity in travel time between lower-income and higher-income neighborhoods. Address proposals in which students from lower-income areas would travel significantly longer distances than peers in more affluent communities.
- Map proposed transportation routes to evaluate whether they are safe, direct, and do not add excessive burden for affected students.
- Evaluate the cost of transportation changes for each proposal, including any new bus routes required, and include this in the mitigation cost estimate and cost for IS center-based and LCE programs.

Family Access to the School

- Consider supports for families without personal vehicles to access the receiving school for conferences, events, and engagement activities.
- Review proximity to public transit options and whether receiving schools are accessible via transit for families across the district.

Within-Building Accessibility

- Audit whether accessible routes for students using mobility aids are primary routes or circuitous detours (e.g., through loading docks or service areas).
- Assess ADA compliance at receiving schools as a minimum standard.

Finances & Demographics

This criterion addresses whether funding is equitably allocated based on student need and how school populations reflect — or fail to reflect — the broader community. It also examines systemic patterns that may have created or sustained resource disparities.

Funding & Resource Equity

- Apply a Weighted Student Formula (WSF) that weights resources by student characteristics such as: low-income (FRL), McKinney-Vento/Foster status, special education, Multilingual Learners, students with READ plans, and students in schools with concentrated poverty.
- Include Small School Subsidies for rural schools to ensure they can sustain core programming regardless of enrollment size.
- Fund utilities and emergency maintenance centrally so that older, less energy-efficient buildings do not lose educational dollars to operational costs.

Internal Segregation (School-Within-a-School)

- Review participation gaps in Advanced/GT enrollment and disproportionality in IEP/504 counts particularly by race and income, at schools under consideration.
- Assess whether consolidation creates an opportunity to address these internal disparities in the design of the receiving school.

Staff Diversity & Distribution

- Review equitable distribution of highly qualified teachers and experienced teachers by site, with attention to whether less affluent or schools with higher percentages of students of color have higher rates of emergency-licensed, out of field, or less experienced staff.

Building Condition & Facilities

Facility condition is an important practical factor. Building quality should be considered carefully while also weighing the human, proximity, and programmatic factors above.

Important: Historically, lower-income schools have received less investment in facilities, making this criterion particularly susceptible to compounding existing inequities. Cross-reference facility condition data with the demographics of the school population served.

Facility Condition Assessment

- Use the Facility Condition Index (FCI): $\{\text{Total Cost of Needed Repairs}\} / \{\text{Current Replacement Value}\}$ and cross-reference with student demographics (FRL rate, McKinney status, ML population, etc.) to identify whether schools serving lower-income students or greater student diversity have greater deferred maintenance.
- Examine whether future maintenance investment is correlated with the demographics of the school served.

Minimum Standards for Receiving Schools

Schools designated to receive displaced students should meet these minimum standards within a reasonable timeframe:

- Automatic doors at primary entry points
- Functional elevator in multi-story buildings
- Accessible parking, pathways, restrooms, playgrounds, fields/gyms, and stages
- HVAC systems with adequate filtration and heating/cooling (MERV ratings appropriate to occupancy)
- Consistent thermal comfort and acoustic treatments to mitigate high ambient noise
- Up-to-date braille signage and accessible intercom systems
- LED lighting in classrooms
- Gender-neutral restroom access
- Flexible and adaptable spaces suitable for varied programming
- Safe, even sidewalks and pavement; close proximity to public transportation drop-off
- Staff access to lactation room
- Student and staff access to private and quiet prayer space

Community Engagement Priorities

Research consistently shows that when families and educators feel excluded from closure decisions, trust erodes and communities bear long-term harm. The following engagement steps are recommended for any proposal moving forward.

- Hold listening sessions at schools identified for closure or consolidation, with translation/interpretation provided in the home languages of the school community, to identify further supports needed to mitigate impacts of changes.
- Engage students — particularly secondary students — as genuine participants in the planning process, not only as subjects of decisions.
- Make public the criteria, data, and proposals being used to evaluate schools before a final decision is reached.
- Document and publicly report how community input influenced each stage of the recommendation and implementation plan.

Sources & Regulatory Frameworks

Category	Primary Source(s)
Building Condition	CDE Facility Insight Program: Colorado’s statewide database for facility condition and adequacy assessments used to guide BEST Grant applications.
School Finance	Colorado Public School Finance Act (SB23-287): Legislative basis for the 2023 Task Force on modernizing funding weights for at-risk and special education students.
Accessibility	2010 ADA Standards for Accessible Design: Federal Title II requirements for public entities to ensure program access and barrier removal.
Budgeting Models	Education Resource Strategies (ERS) & GFOA: Best practices in Student-Centered Funding and the Strategic School System framework for equitable resource allocation.
Equity Indicators	National Academies of Sciences (NASEM): “Monitoring Educational Equity” report (2019), providing evidence-based indicators for tracking disparities in access and outcomes.
Equity Impact Framework	California AB 1912 / EC Section 41329 (2022): Nine-criteria equity impact analysis framework, widely adopted as a national model for school closure equity reviews.
Civil Rights Guidance	California Attorney General Guidance Letter (April 2023): 18-page guidance on civil rights obligations, anti-discrimination requirements, and best practices for all districts.
National Research	TCU Center for Public Education: “School District Rightsizing” brief (May 2025); PACE “Declining Enrollment, School Closures, and Equity Considerations” (2023).
Community Engagement	San Francisco USD Resource Alignment Initiative: Third-party equity audit model and community guardrails for consolidation decisions.