Expert Report of David Norris
Director of Opportunity Mapping
Kirwan Institute for the Study of Race & Ethnicity
The Ohio State University
Columbus, Ohio

April 3, 2014
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TABLE OF CONTENTS

SECTION I: Introduction

SECTION II: Background and Methodology

SECTION III: The Impact of CPS’ Policy on African American Workers in 2008

SECTION IV: The Distribution of Criminal Records in Hamilton County Supports a Finding that African Americans Are More Likely Than Their White Counterparts to Suffer Adverse Impacts Under CPS’ Criminal Background Check Policy

SECTION V: Criminal Background Policies, Like the One Implemented by CPS, Will Likely Have Severe Impacts on the African American Community

SECTION VI: Conclusion
I. Introduction

A. Expert Background and Qualifications

I am the Director of Opportunity Mapping and a Senior Researcher at the Kirwan Institute for the Study of Race & Ethnicity at The Ohio State University (Kirwan Institute). I currently manage the national, state and local mapping projects of the Kirwan Institute and oversee the work of its Opportunity Communities Program. I have served in that capacity for over two years, since March 2012.

In this position, I direct and conduct quantitative and spatial research on topics affecting racially and ethnically marginalized communities, including research about the effects of residential segregation and concentrated poverty, the availability of affordable housing, the impact of incarceration, and neighborhood-based impediments to positive health and education outcomes. In my current position I manage the work of two fulltime Geographic Information Systems (GIS) and policy research staff, and approximately 10 part-time Graduate Research Associates. I serve as a primary liaison at the Kirwan Institute to a national network of organizations and partners requiring GIS research assistance.

Before accepting the position of Director of Opportunity Mapping at the Kirwan Institute, I served as the Community Data Manager and as a GIS Analyst for the Community Research Partners (CRP) in Columbus, Ohio. I worked at CRP for nearly six years, from August 2007 to March 2012. CRP is a nonprofit research organization that collects, analyzes, and makes available original and secondary data to enhance understanding of community conditions, trends, resources, and needs. As a GIS analyst at CRP, I conducted demographic research using U.S. Census, Ohio state agency and local agency administrative data. I also managed CRP’s signature DataSource project. DataSource is a web-based data visualization tool that utilizes social,
physical, economic, demographic and property data to promote understanding of local community conditions, and to enable users to view and compare data for specific geographic areas including counties, cities, and zip codes. I also conducted community trainings on the use of the DataSource tool and other publicly accessible data, teaching community advocates, city and county agency staff, and local nonprofit groups how to access and map data, as well as how to use maps and data in advocacy and decision making. In my capacity at CRP, I participated in the National Neighborhood Indicators Project, an initiative of the Urban Institute in Washington, DC, where I was consulted by peers from across the country on the use of GIS technology to map, analyze and present demographic and administrative data. I have been active in the field of GIS software usage and methodology for 15 years.

In my capacity as the Director of Opportunity Mapping at the Kirwan Institute, and my former role at CRP, I have written or contributed to approximately 30 commissioned reports, research documents and other published works discussing demographic research and utilizing GIS mapping technology.

As the Director of the Kirwan Institute’s Opportunity Communities Program, I regularly serve as an expert speaker on the use of GIS mapping and methodology in support of community data-driven analysis. Through this work I have assisted localities, community organizations, philanthropic organizations, public agencies, policymakers, and other non-profit or faith-based organizations in states and regions across the United States.

The Kirwan Institute’s mapping methodologies have been adopted or utilized by dozens of non-profit, public sector, private businesses, and philanthropic partners across the country, including the U.S. Department of Housing and Urban Development. The research and staff expertise of the Kirwan Institute is regularly shared through publications, reports, issue briefs,
expert testimony, presentations, workshops, webinars, speeches, and other writings, and through collaborative work with a national network of partners located across the United States. Our work has been accepted in litigation and to guide policy formulation at the state and national level.

My curriculum vitae is attached to this report as Appendix A and provides a more detailed look at my accomplishments, qualifications, background and experience. The Kirwan Institute has been retained in this case for its expertise in utilizing data to analyze racial disparity in the United States. I have been assisted in the preparation of this report by Sharon Davies, Executive Director of the Kirwan Institute; Jason Reece, Director of Research; Charles Noble, Legal Analyst; Kwame Christian, Legal Analyst; and other members of the Kirwan staff.

More specifically, I have been asked by Plaintiffs in Waldon v. Cincinnati Public Schools, No. 12-00677 (S.D. Ohio) to examine the impact of Cincinnati Public Schools’ criminal background check policy on African Americans. I am being paid $200/hour for time spent in researching and compiling this report, and for any testimony I may provide in a deposition or at trial. The methods of analysis, sources, databases and other sources that I rely upon in this report are consistent with those commonly used in my field. Payment for the services that I (and my colleagues) have provided in this case is not contingent on the conclusions I have drawn in this report.
B. Report Summary

In 2008, in response to recent State of Ohio legislation, CPS, for the first time, required all employees, both “licensed” and “non-licensed,”¹ to submit to criminal background checks. Based on the results of these background checks, in 2008, CPS ended the employment of nine employees with criminal offenses. Of the nine, one of the employees held a licensed position (teacher); the rest of the employees held non-licensed positions. Eight of the nine employees separated from the district were African American. All of the non-licensed employees who were terminated were African American.

Gregory Waldon and Eartha Britton, the two Plaintiffs in this civil action, were among the nine African American, non-licensed employees who lost their jobs at CPS as a result of their criminal background check in 2008. Mr. Waldon and Ms. Britton filed suit, alleging that the manner in which CPS applied and implemented the criminal background check had an unlawful disparate impact on African-American CPS employees.

This report investigates the impact of CPS’ criminal background check policy on African American workers. After analyzing the impact on the CPS workforce at the time the policy was applied to the two named Plaintiffs in this litigation, as well as demographic data from the U.S. Census Bureau and prison admissions and release data from the Justice Atlas (described below), we conclude that: (i) CPS’ policy had a significant adverse impact on African American workers when it was applied in 2008, and also (ii) the adverse impact on African Americans is likely to persist as long as CPS continues to apply and implement the policy, given the national and regional trends in criminal justice and African Americans’ increased risk of becoming involved

¹ According to the deposition testimony of Carol Landwehr, who worked for CPS’ Human Resources Department for many years, the workforce at CPS is divided into two categories for purposes of criminal background checks: (i) certificated employees (teachers and senior school administrators, such as principals) and noncertificated employees (all other employees). For purposes of this report, “licensed” positions refer to certificated positions; “non-licensed” positions refer to noncertificated positions.
in the criminal justice system.

C. Information Reviewed for this Report

A list of documents reviewed to form our opinion in this litigation is attached as Appendix B. Data considered and used to form our opinion in this litigation is discussed in the “Research Methodology” section below.
II. Background and Methodology

A. Factual Background

Cincinnati is the third largest city, by population, in the state of Ohio; it is also the 25th largest city in the United States, based on the metropolitan population. It is the county seat in Hamilton County. Within the state of Ohio, African Americans constitute 12.2% of the population; Whites constitute 83.0% of the population. African Americans comprise a greater share of the population of Hamilton County (25.7%), the city of Cincinnati (44.1%) and the Cincinnati City Schools district (42.0%).

According to research by Children’s Defense Fund-Ohio, Cincinnati ranks second worst,
behind Detroit, among U.S. cities for child poverty, with an overall child poverty rate of 53.1%. Nearly 60% of African American children in Cincinnati and the CPS District live below the poverty line.

CPS is Ohio’s third-largest school district by enrollment, covering approximately 90 square miles and encompassing the entire city of Cincinnati as well as parts of contiguous communities. The racial composition of CPS mirrors that of all the other “Big 8” urban school districts in Ohio, in that African Americans comprise a larger percentage of the population of the CPS district (42.0%) than of the surrounding county (25.7%) or the state of Ohio as a whole (12.2%). The proportion of African American students of the total CPS enrolled student

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4 American Community Survey 2008-2012 5-year estimates, U.S. Census Bureau.

5 The “Big 8” urban school districts in Ohio comprise, in descending order of district enrollment: (i) Columbus Public School District, (ii) Cleveland Municipal School District, (iii) Cincinnati Public School District, (iv) Akron City School District, (v) Toledo City School District, (vi) Dayton City School District, (vii) Canton City School District, and (viii) Youngstown City School District. In each of these districts, the African American population residing in the district comprises a larger percentage of the total population than in either the surrounding county or the state of Ohio.
population is even higher (64.1% of all students enrolled in the CPS in 2012–2013 were African American).\(^6\)

In 2008, the year CPS ended the employment of the Plaintiffs in this case, 38.6% of CPS’ total workforce was African American (1,612 of the District’s 4,172 full- and part-time employees).\(^7\) Of the total workforce, two-thirds (2,794) held licensed positions while one-third (1,378) held non-licensed positions.\(^8\) African Americans made up a greater percentage of the non-licensed employee pool (50.7%) than the licensed pool (32.7%) (Chart 1). The racial composition of the CPS workforce has not changed considerably in recent years. For example, in 2013, 35.1% of CPS’ total workforce was African American (1,590 of the District’s 4,524 full- and part-time employees).\(^9\)

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\(^6\) Ohio Department of Education 2012 Fall Head Count, 2012-2013 school year.

\(^7\) CPS 2008 All District Staff Information (EEO-5) Report. This Report is included in Appendix B.

\(^8\) This calculation is based on the information contained in the CPS 2008 All District Staff Information (EEO-5) Report. We included, as licensed positions, job categories 2-7 on the 2008 EEO-5 Report. All other job categories on the 2008 EEO-5 Report are included, for the purpose of this calculation, as non-licensed positions.

\(^9\) CPS 2013 All District Staff Information (EEO-5) Report. This Report is included in Appendix B.
B. Research Methodology

In order to understand the racial demographics of the CPS district, Cincinnati, Hamilton County, and the State of Ohio more generally, the Kirwan Institute examined and analyzed data collected by the U.S. Census Bureau, including the Census’s American Community Survey, and the Ohio Department of Education. We also reviewed, for the purpose of understanding the impact of the challenged policy on the workforce, demographic documentation provided by CPS through this litigation. The CPS documentation that was pivotal to our analysis in this report has also been included in Appendix B.

Additionally, to estimate the localized or neighborhood impact of CPS’ criminal background check policy on the African American community of Hamilton County, the Kirwan Institute utilized data gathered by the Justice Atlas Project (JA) created by the Justice Mapping Center in 2010. The Justice Atlas Project mapped 2008 data regarding prison admissions and prison releases at the state, county, municipality, ZIP Code and census tract level for 22 states, including the state of Ohio. The ZIP Code level data for Hamilton County were the smallest.
geographic units available for retrieval in data tables from the JA dataset. The Kirwan Institute reviewed JA’s prison admissions/release data for all of the Hamilton County ZIP Codes to determine if the residences of the prisoners admitted and released from the county that year were evenly dispersed across the county or clustered in a relatively narrow band of ZIP Codes.
III. The Impact of CPS’ Policy on African Americans Workers in 2008

The CPS employment of the two plaintiffs in this case—Mr. Waldon and Ms. Britton—ended in 2008 as a result of the information contained in their criminal background reports. We begin our analysis of the impact of CPS’ policy on African American workers by examining how members of the workforce fared in 2008, the year CPS implemented the criminal background check policy.

In absolute terms, African American workers were adversely impacted in greater numbers than their White counterparts. Of the nine workers that lost their employment as a result of the policy, eight were African American, one was White. Of the eight non-licensed employees who lost their jobs, all eight were African Americans.

The impact on African Americans was disproportionately greater even when analyzed in the context of their relative composition of the total CPS workforce. As stated previously, in 2008, 38.6% of CPS’ total workforce was African American (1,612 of the district’s 4,172 employees). Yet, they made up 88.8% of the employees separated from CPS as a result of the policy. Among non-licensed workers in 2008, African Americans constituted 50.7% of the CPS workforce. Yet, they made up 100% of the non-licensed workers who were terminated under this policy in 2008.

In both absolute and relative terms, African American employees were more adversely impacted by CPS’ implementation of the criminal background check policy in 2008.

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10 CPS List of Employees Separated. This Document is included in Appendix B.
Proportion of 2008 CPS Workforce and Separated Employees That Were African American

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

Total CPS Workforce

All Separated Employees

Non-licensed CPS Workforce

Non-licensed Separated Employees

African American

All Other Races

61.4%
38.6%
11.1%
88.9%
49.3%
50.7%
100.0%

Source: CPS 2008 All District Staff Information (EEO-5) Report
IV. The Distribution of Criminal Records in Hamilton County Supports a Finding that African Americans Are More Likely Than Their White Counterparts to Suffer Adverse Impacts under CPS’ Criminal Background Check Policy

The fact that African Americans were adversely impacted by CPS’ criminal background check policy in 2008 (in both absolute and relative terms) is consistent with data concerning the distribution of criminal records in Hamilton County.

While exact figures on the total population of individuals with criminal convictions in Hamilton County are not available, it is possible to use state jail and prison intake data and parole population data to reasonably conclude that African Americans are disproportionately represented in Hamilton County’s population with criminal convictions.\footnote{Inquiries to the Ohio Department of Rehabilitation and Corrections indicate that no complete count or local count of the entire population which was formerly incarcerated or with a felony conviction exists.} According to data from the Ohio Department of Rehabilitation and Corrections (ODRC) regarding annual prison intake from counties across the state, residents from Hamilton County entering Ohio’s prison system are predominately African American. For example, based on ODRC’s 2010 prisoner intake data, African Americans from Hamilton County constituted 61.1% of all of the inmates from the county. That figure is more than two times greater than the African American population of Hamilton County (25.6%).\footnote{U.S. Census Bureau. 2010 Decennial Census. Available on-line at: www.census.gov} Other recent inmate intake surveys revealed even higher rates: in 2007 and 2008, 69% of the inmates from Hamilton County were African American, and in 2009, 78% were African American. In fact, African Americans have constituted somewhere in the range of 61% to 78% of the Hamilton County inmate population every year since 2005.

In short, while only about one quarter of the population of Hamilton County is African
American, roughly two-thirds of Hamilton County residents imprisoned each year since 2005 in the State have been African American. In 2009, the percentage rose to 78%. Similar ratios are found in the adult parolee population. Given that all available data strongly suggests that African Americans make up well over half of the population of Hamilton County residents with criminal convictions, it is unsurprising that any policies that tie adverse actions to criminal records would impact African Americans more than Whites.

Moreover, to better understand patterns of criminal convictions, we analyzed Justice Atlas (JA) prison admissions and release data for ZIP Codes across Hamilton County and a subset of ZIP Codes closely approximating the CPS district boundaries. Specifically, we examined the characteristics of the ZIP Codes with the highest incarceration and release rates in the county (all but one of which are located wholly or mostly inside the CPS district). Maps depicted in Figure 1 illustrate the geographic distribution of prison admissions and releases in 2008 (Figure 1, A and B, respectively). We classified Hamilton County ZIP Codes as “high activity” (16 ZIP Codes) and “low activity” (35 ZIP Codes) on the basis of the prison admission and release rates determined from the JA data (Figure 1, C). ZIP Code level prison admission and release numbers were downloaded from the JA website, and rates were calculated using U.S. Census ZIP Code adult population counts as the denominators. A statistical analysis was done that divided the ZIP Codes into those with rates above (high activity) and below (low activity) the average for all Hamilton County ZIP Codes.

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13 All figures referenced in this report are included in Appendix C.
14 High activity ZIP Codes: 45111, 45202, 45203, 45204, 45205, 45206, 45207, 45214, 45216, 45223, 45224, 45225, 45227, 45229, 45232, 45237.
15 Low activity ZIP Codes: 45001, 45002, 45052, 45211, 45233, 45238, 45239, 45248, 45030, 45224, 45225, 45227, 45229, 45232, 45237.

For denominators in the rate calculations involving the JA data, we used U.S. Census population counts from the American Community Survey (ACS) 2007–2011 5-year estimates (midpoint year 2009), on the assumption that census estimates from this time frame would provide the closest available population estimate match to the 2008 Justice Atlas data.
Figures 2, 3 and 4 demonstrate the high degree of overlap among the high activity ZIP Codes, the ZIP Codes of residence of CPS employees separated from the district, and the CPS district. These maps also indicate the location of the eight ZIP Codes of residence for the nine CPS employees separated from the district.\textsuperscript{15} Figure 5 shows the overlap of the CPS district boundaries and ZIP Codes with high percentage African American populations. Our analysis clearly finds that the CPS district disproportionately is made up of areas of high prison admissions and releases (high activity ZIP Codes) (Figure 4), which also are predominately African American (Figure 5). As seen in Table 1, the CPS district experiences higher rates of both prison admissions and releases than the county as a whole.

<table>
<thead>
<tr>
<th></th>
<th>Admissions</th>
<th>Releases</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>Rate</td>
</tr>
<tr>
<td>Cincinnati City School District</td>
<td>1,878</td>
<td>5.8</td>
</tr>
<tr>
<td>High-Activity ZIP Codes</td>
<td>1,388</td>
<td>10.4</td>
</tr>
<tr>
<td>Hamilton County</td>
<td>2,485</td>
<td>3.8</td>
</tr>
<tr>
<td>Ohio</td>
<td>23,805</td>
<td>2.7</td>
</tr>
</tbody>
</table>


African Americans comprise the majority of residents in high activity ZIP Code areas. These areas have a combined population that is 55.7% Black. By comparison, the resident population in low-activity ZIP Codes is just 15.6% Black (Table 2).

\textsuperscript{15} Maps of employee residence ZIP Codes were derived from Exhibit A, which identifies home addresses of employees dismissed by City of Cincinnati School District.
All nine of the employees dismissed by the Cincinnati Public Schools reside within the boundaries of the CPS district, and eight of the nine employees (seven Black, one White) reside in high activity ZIP Codes. On the basis of this data, it is reasonable to infer that CPS’ background check policy is likely to have a greater adverse impact on African Americans who reside in Hamilton County and who fall within the geographic boundaries of the CPS district as compared with their White counterparts.
V. Criminal Background Policies, Like the One implemented by CPS, Will Likely Have Severe Impacts on the African American Community

Considering the extreme disparities found in incarceration rates for the African American community, workplace restrictions that limit economic opportunity for those who are currently employed or seeking employment based *solely* on a criminal conviction in the past place a substantial economic burden on already stressed African American families. African American workers face a variety of barriers to economic opportunity. These economic conditions have been made worse by the impact of the recession, where African American workers were disproportionately impacted by housing instability and job losses.

Neighborhoods disproportionately burdened by the costs of mass incarceration are frequently the sites of significant systemic, structural disadvantage—they are home to sub-standard schools and inadequate or unaffordable healthcare systems, with high rates of unemployment, poverty, and homelessness. These are also the same low-opportunity neighborhoods that disproportionately bear the burdens of re-entry, because most people return to their home communities after completing their sentences.

“Because poor Black men and women tend to live in racially and economically segregated neighborhoods, these neighborhoods feel the brunt of the staggering prison figures. *Research in several cities reveals that the exit and reentry of inmates is geographically concentrated in the poorest, minority neighborhoods. As many as 1 in 8 of the adult male residents of these urban areas is sent to prison each year...*”

This means that the phenomenon of “mass incarceration” has typically inflicted its costs on a

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relatively confined cluster of inner city neighborhoods or other severely disadvantaged communities. The burdens of mass incarceration are as a result highly localized. As put by one nationally respected legal scholar reflecting on these “neighborhood effects” in New York:

“Thirty years of forced removal to prison of 150,000 young males from particular communities of New York represent collective losses similar in scale to the losses due to epidemics, wars, and terrorist attacks-with the potential for comparable effects on the survivors and the social structure of their families and communities.”

Restrictions are tremendously problematic in higher poverty and racially segregated urban neighborhoods, where larger concentrations of people with any kind of criminal record are found and in which challenging economic conditions are exacerbated by the barriers to employment for those individuals and their families. Many neighborhoods within Hamilton County and the CPS district boundaries face this challenge. In the 2008–2012 American Community Survey, Hamilton County reported a 9.2% unemployment rate. In contrast, the unemployment rate for the CPS district area was 11.6%, and high prison admissions and releases ZIP Codes in the county had an aggregate unemployment rate of 14.8% (Table 3). Similar disparities were found in poverty rates. In contrast to Hamilton County’s 17.1% poverty rate, the CPS district had a 27.7% poverty rate, and high prison admissions and releases ZIP Codes in the county recorded an aggregate poverty rate of 34.0% (Table 3). Economic sanctions placed on people with criminal records, who are more likely to be African American, create an additional economic burden for the African American community within these neighborhoods of mass incarceration.

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19 Id.
Researchers have estimated the economic effect of imprisonment on the African American community by calculating overall lost potential earnings in the following way:

“The sum of the earnings lost by white men who have been incarcerated is equal to 2% of the total earnings that would otherwise have been expected across all white men. [But], because Hispanic and Black men are more likely to serve a term of incarceration, their communities lose a larger share of overall male earnings. The lost earnings associated with incarceration are equal to 6% of total expected Hispanic male earnings and 9% of total expected Black male earnings.”

As this research reflects, for African Americans, terms of incarceration frequently impose punishments extending beyond the completion of a criminal sentence, and inflict harms not experienced by members of other racial groups. For example, research shows that African Americans with criminal records have greater difficulty finding work than do White ex-offenders. An analysis conducted by a University of Wisconsin professor of individuals attempting to re-enter the labor market after serving their sentence found that 17% of White job applicants with criminal records received call backs from employers, while only 5% of Black job applicants with criminal histories were called back. Studies have shown that African Americans without criminal records are less than half as likely to receive callbacks as white job applicants with the same qualifications (14% vs. 34%).

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VI. Conclusion

CPS’ implementation of the challenged criminal background check policy in 2008 had a significant adverse impact on African American employees, including Mr. Waldon and Ms. Britton. This result was predictable given the distribution of criminal conviction rates in Hamilton County, and the United States more generally.
This report is signed on this 3rd day of April, 2014 in Columbus, Ohio.

David Norris  
Director of Opportunity Mapping and Sr. Researcher  
Kirwan Institute for the Study of Race & Ethnicity
Appendix A: Curriculum Vitae

David L. Norris

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Employment History

Senior Researcher / Director of Opportunity Mapping
The Kirwan Institute for the Study of Race and Ethnicity, The Ohio State University, Columbus, OH (3/12–Present)
Conduct and direct quantitative and spatial research on topics affecting racially/ethnically marginalized communities including segregation, concentrated poverty, housing, crime, health and education. Manage and supervise four GIS and policy research staff and GRAs to complete research projects. Act as primary liaison to outside organizations requiring research assistance. Conduct mapping workshops and trainings. Guest lecturer for university classes on request.

Community Data Manager / GIS Analyst
Community Research Partners, Columbus, OH (8/07–3/12)
Conduct demographic research using U.S. Census, Ohio state agency and local agency administrative data. Perform geospatial analysis using geographic information system (GIS) software and methods. Manage the organization’s DataSource community indicators website and lead workshops in the site’s use. Co-led national collaborative project with the University of Massachusetts and eight other organizations to create and deploy WEAPE (Web-Enabled Analysis and Visualization Environment) data visualization software. Co-wrote successful $150K capacity-building grant application to grow CRP’s IT staff capacity.

Communications Manager/Researcher
KidsOhio.org, Columbus, OH (4/02–8/07)
Conducted policy research and data analysis using Census and state agency data. Provided data for, and wrote portions of, grant proposals. Managed organization’s web presence, including web page design (text and graphics), listserv mailings, and web analytics. Created interactive maps for website using GIS software and methods.

Communications Manager
Children’s Defense Fund-Ohio, Columbus, OH (5/98–4/02)
Managed organization’s web presence. Co-wrote and edited CDF-Ohio publications. Served on national Steering Committee for The Annie E. Casey Foundation’s KIDS COUNT Project, a CDF-Ohio funder; peer trainer for KIDS COUNT grantee organizations to apply GIS software and methods to child advocacy.

Technical Services Representative / Corporate Trainer
Chemical Abstracts Service, American Chemical Society, Columbus, OH (8/95–5/98)
Led workshops at client sites and user meetings across the U.S. on bibliographic database searching, including chemical structure and patent searches. Trained new workshop instructors and other staff in-house.

Assistant Editor
Journals Division, American Chemical Society, Columbus, OH (6/92–8/95)
Copy-edited manuscripts for journal Biochemistry. Coordinated production of Biochemistry issues. Member of liaison group between editorial and production departments to streamline journal publication.

Adjunct Lecturer
Department of Biology, Ohio Dominican College, Columbus, OH (Two semesters, 1/92–4/92; 6/93–8/93)
Taught Weekend College biology course for nontraditional students.

Education

Master of Arts, Public Policy and Management, The Ohio State University, Columbus, OH, 2004.

Neuroscience graduate program, The Ohio State University, Columbus, OH, 8/87–6/92.
Developmental Biology graduate program, College of Life Sciences, Purdue University, West Lafayette, IN, 8/82–10/84.

Bachelor of Science, Zoology, Ohio University, Athens, OH, 1982 (Summa cum Laude).

References Available on request.
Appendix B: Documents Consulted

Waldon v. CPS Amended Complaint (dated October 16, 2013)

Defendant’s Response to Plaintiff’s Interrogatories (dated February 11, 2014)

Deposition of Carol Landwehr dated February 19, 2014

CPS All District Staff Information (EEO-5 Reports) and Staff Statistics (CPS 308-13)

List of CPS Employees Separated (P 109)

Documentation Pertaining to CPS’ Criminal Background Check Policy (P 240-54; P 278-82)
## LIST OF CPS EMPLOYEES SEPARATED

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<thead>
<tr>
<th>Name</th>
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<th>Position / Location</th>
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<td>(513) 221-1655</td>
<td>8/8/1997</td>
<td>Drug Trafficking</td>
<td>Retention</td>
<td>5/21/2009</td>
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</table>
Appendix C: Figures Referenced

Figure 1: Hamilton County ZIP Codes with High Rates of Prison Admissions and Releases (High-Activity ZIP Codes)

A. Prison admissions

B. Prison releases

C. High-activity ZIP Codes

Prison Admissions Rate Distribution

\[
egin{align*}
\text{Aadm\_Rate} &< -0.75 \text{ Std. Dev.} \\
-0.75 - -0.25 \text{ Std. Dev.} \\
-0.25 - 0.25 \text{ Std. Dev.} \\
0.25 - 0.75 \text{ Std. Dev.} \\
0.75 - 1.3 \text{ Std. Dev.} \\
1.3 - 1.8 \text{ Std. Dev.} \\
1.8 - 2.3 \text{ Std. Dev.} \\
>2.3 \text{ Std. Dev.}
\end{align*}
\]

Prison Release Rate Distribution

\[
egin{align*}
\text{Rel\_Rate} &< -0.75 \text{ Std. Dev.} \\
-0.75 - -0.25 \text{ Std. Dev.} \\
-0.25 - 0.25 \text{ Std. Dev.} \\
0.25 - 0.75 \text{ Std. Dev.} \\
0.75 - 1.3 \text{ Std. Dev.} \\
1.3 - 1.8 \text{ Std. Dev.} \\
1.8 - 2.3 \text{ Std. Dev.} \\
>2.3 \text{ Std. Dev.}
\end{align*}
\]

Figure 2: Relationship between High-Activity Hamilton County ZIP Codes and ZIP Codes of Residence of Separated CPS Employees

Sources: Kirwan Institute analysis of data from Justice Atlas, 2008, and CPS records from Exhibit A.
Figure 3: Relationship between High-Activity Hamilton County ZIP Codes and the Cincinnati Public Schools District

Figure 4: Relationship among High-Activity ZIP Codes, Separated Employee ZIP Codes, and the CPS District

Sources: Kirwan Institute analysis of data from Justice Atlas, 2008; CPS records from Exhibit A; and U.S. Census TIGER geography shapefiles, 2012.
Figure 5: Percentage of the ZIP Code Population that is Black, in Relation to the CPS District

Percent Black
- Less than 5.0%
- 5.0% - 10.0%
- 10.1% - 25.0%
- 25.1% - 50.0%
- More than 50.0%