

October 10, 2025

Norfolk Public Schools School Board of the City of Norfolk 800 E City Hall Avenue Norfolk, VA 23510

Via E-Mail

RE: VOTE NO ON THE SCHOOL CLOSURE PLAN AND COMMIT TO A COMMUNITY-DRIVEN PLAN TO DELIVER HIGH-QUALITY LOCAL PUBLIC SCHOOLS FOR ALL NORFOLK FAMILIES

Dear Members of the School Board:

Advancement Project urges the School Board of the City of Norfolk ("the Board") to VOTE NO on the School Closure Plan, HALT any existing steps towards closing schools, and START a community-driven process to ensure that schools meet the needs of their school communities. Advancement Project is a national racial justice organization committed to supporting communities fighting to keep their neighborhood public schools and to ensuring that our nation's children are cared for and provided the robust, liberatory education that they deserve. We urge the members of the Board to choose children and families over private interests and embark on a new community-driven process to deliver high-quality, racially just schools for all Norfolk Public Schools ("NPS") students.

Local public schools are pillars of communities and neighborhoods. But despite their importance, actions by the Norfolk City Council ("the Council") would impose discriminatory school closures primarily in Black communities without considering the needs or desires of the people who would be impacted. On March 26, 2025, the Council passed a resolution ("the Council Resolution") threatening to strip the Board of its authority over budget appropriations unless the Board votes to approve mass school closures before a predetermined deadline. The Council Resolution provides no educationally-sound justification for closing schools—it 1) assumes, without providing evidence, that closing schools will resolve projected shortfalls in the NPS budget; 2) attempts to usurp the Board's authority over its schools; and 3) completely ignores whether closing schools would serve the needs or desires of NPS families.

Despite the Council's lack of legal authority, members of the Board have taken steps toward closing schools. On July 8, 2025, the Board held a "Retreat" ("the July 8 Board Retreat")

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¹ See City of Norfolk, Resolution Requesting the Norfolk School Board to Prioritize a Plan to Consolidate Schools (Mar. 25, 2025) ("Council Resolution"), https://www.norfolk.gov/DocumentCenter/View/96972/R-09-Resolution-Requesting-the-Norfolk-School-Board-to-Prioritize-a-Plan-to-Consolidate-Schools.

to discuss a proposed plan for mass school closures of at least 13 NPS schools—almost exclusively schools with majority-Black populations or in majority-Black neighborhoods.² At a meeting on September 3, 2025, the Board discussed a largely identical list of schools to close under a revised timeline.³ On September 11, 2025, NPS for the first time posted a list of schools considered for closure on its website.⁴ On September 29, 2025, the Board finalized a list of schools proposed for closure ("the School Closure Plan") that would lead to the closure of at least 13 schools.⁵ On October 15, 2025, the Board is scheduled to vote yes or no on the Plan.⁶

The School Closure Plan would close predominantly Black schools and would likely further displace Black families and perpetuate race and class disparities in NPS. Moreover, neither the Council nor the Board have yet provided any evidence that the School Closure Plan would resolve NPS's budget concerns or that they have yet undertaken any responsible long-term planning for the future viability of public schools in Norfolk.

It is not too late for the members of the Board to reverse course. We call on the Board to listen and respond to the wishes and needs of constituents and develop a new plan for a future NPS that equitably serves *all* students. Specifically, we urge the Board to invest in sustainable community schools that address the needs of students and families holistically and not proceed with the School Closure Plan.

I. The Board Has Discretion to and Should Ignore the Council Resolution

The decision of how to spend NPS's limited resources—such as how to counteract enrollment declines and alternatives to school closures—should be community and stakeholder-driven, guided by experts in the field of education, and made solely by decision-makers elected to govern NPS who are accountable to voters (*i.e.* the members of the Board). The Council Resolution not only fails to meet these guidelines but also lacks any legal authority. As such, the Board should

https://go.boarddocs.com/vsba/nps/Board.nsf/files/DJ8Q4K677EDE/\$file/JulyBoardWorkshop_DRAFTFacilityRecs.pdf (hereinafter "July School Closure Recommendations").

⁵ See Closure and Consolidation Plan Norfolk Public School Buildings,

https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf. Although the School Closure Plan ostensibly would close at least nine schools, four schools designated as

"repurposed" would actually be closed as well.

² See Draft Facility Recommendations: July 2025,

³ See Norfolk Public Schools, Envisioning a new portfolio of schools for NPS at 13, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DL7P4G62C89C/\$file/School%20Consolidation%20Presentation.pdf (identifying four school closure plans as "Options 1–4," which are largely identical apart from Option 4, which exempts the Ghent School from moving facilities).

⁴ See Norfolk Public Schools, School Consolidation Final Draft - Based on 9/10/2025 Meeting, https://www.npsk12.com/cms/lib/VA02208074/Centricity/Domain/4/Draft%20Final%20Consolidation%20Plan.pdf.

⁶ See Brett Hall & Markeisha Jackson, No Vote By Norfolk School Board On New Closure Plan, WAVY (Sept. 29, 2025), https://www.wavy.com/news/local-news/norfolk/norfolk-school-board-could-consider-yet-another-closure-plan-at-monday-meeting/.



ignore the Council Resolution and instead collaborate with the NPS community to ensure that all students and families get what they need and deserve from their public schools.

A. The Board Has the Sole Authority Under Virginia Law to Close Schools

The Council Resolution is a request, not a mandate. The Virginia Constitution is clear that "[t]he supervision of schools in each school division shall be vested in a school board" and the Virginia Code solely authorizes school boards, not city councils, to decide whether to consolidate or close a school.⁸ As such, the Board is not required to consider or act upon the Council Resolution.

B. The Board is Obligated to Follow Its Bylaws

Moreover, the Board is obligated to act consistent with its own bylaws, 9 which emphasize the Board's commitment "to providing equal opportunity for every student" and require that the Board: "[t]reat[] all members of the school community equitably and with respect" and "[a]llocate[] and use[] assets fairly and efficiently." 10

The School Closure Plan is inconsistent with the Board's bylaws. First, it is inconsistent with the commitment to "equal opportunity for every student to achieve intellectual, social, emotional and physical growth," because, as explained further below, school closures have a demonstrated record of harming students' academic and behavioral outcomes, and the School Closure Plan includes no additional resources to counteract the risk of these effects. Second, the School Closure Plan does not treat all members of the school community equitably and with respect because, as explained further below, it disproportionately forces Black, Latine, and lowincome students to lose their schools and travel further to access public schools. Third, the School Closure Plan does not "[a]llocate[] and use[] assets fairly and efficiently" because, as further explained below, there is no evidence that it will resolve NPS's budget concerns.

C. The Board May Not Be Complying with its Own Regulations

In addition, the Board may not be following its own regulations. As an initial matter, the Board has not made public the membership of the Educational and Facilities Planning Advisory Committee or demonstrated that the Committee includes "principals of the potentially affected

⁷ Va. Const., Art. VIII, § 7.

⁸ See Virginia Education Code § 22.1-79 (4) ("Each School Board shall" . . . "[p]rovide for the consolidation of schools or redistricting of school boundaries or adopt pupil assignment plans . . ."). See also Hunn v. Loudoun Cnty. Sch. Bd., 98 Va. Cir. 418 (2012) ("§ 22.1-79(4) specifically authorizes school boards to '[p]rovide for the consolidation of schools . . . "").

⁹ See, e.g., Virginia Education Code § 22.1-79 (7) ("Each School Board shall" . . . "[p]erform such other duties as shall be prescribed by the Board.").

¹⁰ Norfolk City School Board Policies and Regulations AD (Revised Aug. 18, 2021), https://go.boarddocs.com/vsba/nps/Board.nsf/files/C62SNP71A4AD/\$file/AD%20-%20Educational%20Philosophy. pdf.

schools, staff representatives, representatives from PTA, and business partners of each potentially affected school," as is required by the regulation.¹¹

Moreover, Board regulations lay out the following non-exhaustive list of potentially relevant factors that may inform whether to close a school:

- i. Student enrollment trends
- ii. Initial cost and savings as a result of the closing
- iii. Effect on personnel
- iv. Age or condition of school buildings
- v. Transportation
- vi. Educational programs
- vii. Racial composition of student body
- viii. Financial consideration
 - ix. Student relocation possibilities
 - x. Impact on community in the geographic attendance area of the proposed school to be consolidated or closed and impact on the communities of schools to which students will be relocating
- xi. Space needed in the system for "reduction in class size" initiatives
- xii. Historic value of the building.¹²

Board regulations further state that the Board "shall address any relevant factors . . . including, but not limited to" the list above when considering school closures. This provision necessarily requires an assessment of which factors on the list are relevant, whether there are additional relevant factors, and how the Committee shall address those factors.

There is little evidence that the Council Resolution or the Committee complies with this provision. The Council Resolution only explicitly names two of the aforementioned factors (enrollment and facilities repairs) and the Board has not shared any evidence that it has addressed any of the other listed factors, which are relevant here. Publicly available materials do not provide evidence that the Board considered any of the other factors, many of which are likely relevant, including initial costs and savings, ¹³ effect on personnel, transportation, educational programs,

¹¹ See id. (no information about Advisory Committee membership); Board Regulation BBA-R.

¹² Id.

Although NPS provided a document that purports to list the cost savings of proposed school closures, this document is merely a one-page list of staff salaries that acknowledges that these roles may be reassigned—potentially reducing or eliminating any cost savings. Additionally, this document fails to consider other costs associated with closing schools. As such, is likely an inadequate consideration of cost-savings under the regulations. See Cost Savings Breakdown per Elementary School Closure,

 $[\]underline{https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLCRNL6ED120/\$file/ES\%20Cost\%20Savings\%20Breakdown.pdf.}$



racial composition of the student body,¹⁴ impact on community in the geographic attendance area, financial consideration, space needed in the system for "reduction in class size initiatives," or the historic value of any buildings.¹⁵

Additionally, there is no indication that the Board considered other factors that are likely relevant here, including ability of elementary school families to walk to school, community wraparound services offered by schools proposed for closure and how the community would be able to access those services if the school closes, and the academic and behavioral impact on students who would lose their schools. As there is no evidence that the Board considered a slew of the factors listed—which it must consider if relevant—or that it considered any other relevant factors, approving the School Closure Plan may violate the Board's own regulations.

II. The School Closure Plan Is Racially Discriminatory, Would Deprive Students of Academic Opportunity, and Lacks Community Input

In large measure, the School Closure Plan would force Black, Latine, and low-income families to shoulder the burden of school closures and may accelerate gentrification and displacement of Black low-income neighborhoods. Moreover, the Plan lacks community buy-in because it was created without sufficient opportunities for input.

A. The School Closure Plan is Racially Discriminatory

Nationwide, school districts disproportionately close majority-Black schools ¹⁶ and disproportionately displace Black and Latine students when they do so. ¹⁷ NPS, for its part, also has a history of denying Black students and English Learner students equal access to the high quality education they deserve. ¹⁸ The School Closure Plan would continue this pattern of

disadvantaged minority students").

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¹⁴ To the extent that the Board conflates the July School Closure Recommendations' oblique references to "promot[ing] diversity," with the regulation's reference to "racial composition of the student body," these two ideas are not equivalent. The Board provided no information about the racial composition of the student body at any school, which is necessary to assess an individual school's diversity.

¹⁵ See generally July School Closure Recommendations, supra n.2.

¹⁶ Carrie Hahnel & Francis A. Pearman, II, *Declining Enrollment, School Closures, and Equity Considerations*, Policy Analysis for California Education 4–5 (Sept. 2023), https://edpolicyinca.org/sites/default/files/2023-09/pb_hahnel_sept2023.pdf (2023 study of school closures nationwide found that "majority-Black schools, which make up roughly 10 percent of the overall U.S. public school population, were more than three times as likely to close as non-majority Black schools.").

¹⁷ See, e.g., Chunping Han et al., Lights Off: Practice and Impact of Closing Low-Performing Schools, CENTER FOR RESEARCH ON EDUCATION OUTCOMES at 4 (2017), https://credo.stanford.edu/wp-content/uploads/2021/08/closure_final_volume_i.pdf ("low-performing schools with a larger share of black and Hispanic students were more likely to be closed than similarly performing schools with a smaller share of

¹⁸ See, e.g., Office for Civil Rights, U.S. Dep't Educ., OCR Complaint No. 11-17-1312 Resolution Letter (Nov. 8, 2019), https://www.ed.gov/media/document/11171312-apdf-31736.pdf; Mary C. Doyle, From Desegregation to Resegregation: Public Schools in Norfolk, Virginia 1954-2002, 90 JOURNAL OF AFRICAN AMERICAN HISTORY 64 (2005).

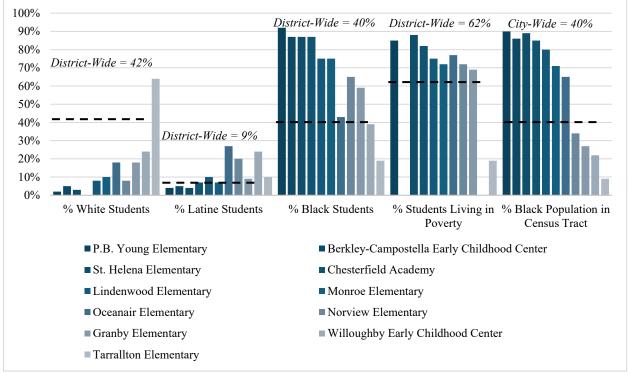


systemically under-resourcing schools attended predominantly by Black, Latine, and low-income students by targeting them for closure.

As is displayed in Figure 1, all but two of the schools planned for closure serve a disproportionately larger share of Black students compared to the NPS-wide average, while only one of the schools that the Board proposed to close in the School Closure Plan has a white student population above the NPS average. Additionally, all but one of the schools proposed for closure serve a percentage of students living in poverty that is higher than the NPS average.

wide average).¹⁹ 100% District-Wide = 40%District-Wide = 62%Citv-Wide = 40%90% 80%

Figure 1. Schools Closed Under School Closure Plan (Dotted line represents district- or city-



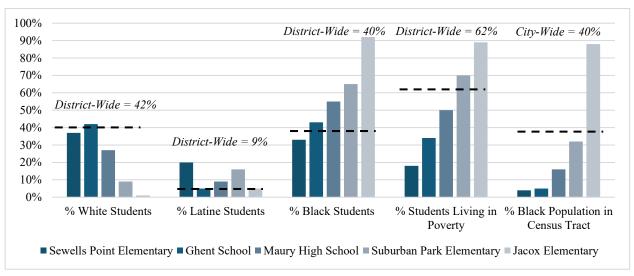
By contrast, as displayed in Figure 2, the schools that would be renovated or rebuilt according to the School Closure Plan have student bodies and neighborhood demographics that skew whiter. This means that the School Closure Plan would largely improve schools in whiter and wealthier neighborhoods while closing schools serving larger shares of low-income families.

population data are available for these schools.

¹⁹ For precise figures and data sources, see Appendix A. As explained in Appendix A, percentages of students living in poverty at Berkley-Campostella and Willoughby Early Childhood Centers are unavailable on the NPS Website and therefore appear blank for that category in Figure 1. Additionally, Norfolk Technical Center, Southeastern Cooperative Educational Facility, and Madison Alternative Center were not included in Figure 1 because no student



Figure 2. Schools to be Renovated or Rebuilt Under School Closure Plan (Dotted line represents district- or city-wide average).²⁰



Socioeconomic inequities of the School Closure Plan are also borne out in the schools slated for improvements or renovations. For example, the School Closure Plan pays for a state-of-the-art athletic complex and brand-new indoor pool at Maury High School, NPS's best-resourced high school in one of Norfolk's wealthiest and whitest neighborhoods.²¹ By contrast, the School Closure Plan closes the overwhelmingly Black and low-income P.B. Young and Monroe Elementaries.²² Nearby, the City of Norfolk is demolishing public housing that largely serves Black families and plotting a redevelopment plan that residents fear will displace low-income individuals.²³ Furthermore, the School Closure Plan proposes to build a new building for the Ghent School²⁴—which has 34 percent of students living in poverty compared to the District-wide average of 62 percent—reopening it a mile away at the closed Monroe Elementary School site.

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²⁰ While the version of the School Closure Plan presented at the September 10, 2025 meeting listed only Maury in renovation plans, remarks made by Board members at the September 17, 2025 meeting suggested that renovations to schools identified in previous versions would likely occur at a later date. *See* Norfolk Public Schools, School Consolidation Final Draft - Based on 9/10/2025 Meeting,

https://www.npsk12.com/cms/lib/VA02208074/Centricity/Domain/4/Draft%20Final%20Consolidation%20Plan.pdf, ²¹ See Jay Greene & Maddie Miller, Latest Proposal For Maury High Includes Demolishing Ghent School, Adding Stadium, WTKR News 3 (Jul. 15, 2025), https://www.wtkr.com/news/in-the-community/norfolk/latest-proposal-for-maury-high-includes-demolishing-ghent-school-adding-stadium (plan "consists of a football/multi-sport field, softball and baseball fields, tennis courts, a soccer field and a swimming complex").

²² Under The July School Closure Recommendations and "Options 1–3," Monroe Elementary would be closed and be replaced by the Ghent School.

²³ See WHRO, 'It Was Horrific': Norfolk's Predominantly Black East Ghent Wiped Off The Map In 1970s (Jul. 21, 2020), https://www.whro.org/2020-07-21/it-was-horrific-norfolk-s-predominantly-black-east-ghent-wiped-off-the-map-in-1970s (articulating concerns that the St. Paul's Area redevelopment plan will repeat historical pattern of eliminating Black community in Norfolk).

²⁴ See Closure and Consolidation Plan Norfolk Public School Buildings, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf.



Meanwhile, the students attending Monroe—75 percent of whom are Black and 72 percent of whom are living in poverty—would be forced to travel another 2.4 miles to get to their new assigned school. ²⁵ The discriminatory impact of the proposed renovations and closures are obvious—the School Closure Plan would build state of the art school facilities that benefit a larger share of wealthier and whiter families while closing majority-Black and majority-low-income schools.

Meanwhile, the School Closure Plan would leave the neighborhoods south of the Elizabeth River, which are 87 percent Black, **with only one school that offers grade K-5** (Southside STEM Academy, which is a hybrid school that offers grade K-8). For example, the School Closure Plan would close St. Helena Elementary School, which is the only elementary school in the Berkley neighborhood. Creating a school desert in Berkley would be yet another loss for families in that community, who have lost other resources in recent years, including the neighborhood center and pool. ²⁶ The School Closure Plan fails to address how families will be able to access the educational resources they need when their schools close. ²⁷

Additionally, the School Closure Plan would turn Lake Taylor High School, the only High School in East Norfolk, into a high school that offers only career and technical education to the mostly Black and Latine students attending schools in that part of the city. All young people deserve to be able to pursue their interests and whatever career path they choose. But this part of the School Closure Plan could inadequately prepare East Norfolk students to pursue postsecondary studies or careers and limit opportunities for children living in that part of the city.

Finally, although the School Closure Plan purports to follow "the board directive to promote diversity and reduce concentrations of poverty," in actuality, it unjustly burdens Black and low-income families and fails to offer any improved resources or educational benefits. For instance, the School Closure Plan proposes to close Lindenwood Elementary (75 percent Black) and reassign those students to Willard Elementary (57 percent Black) to "promote diversity." Similarly, the School Closure Plan proposes to "promote diversity and reduce concentrations of poverty" by closing Monroe Elementary, which is 75 percent Black, and forcing those families to

https://go.boarddocs.com/vsba/nps/Board.nsf/files/DL7P4G62C89C/\$file/School%20Consolidation%20Presentation_pdf (Options 1–3); Appendix A.

²⁵ See July School Closure Recommendations at 2; Norfolk Public Schools, Envisioning a new portfolio of schools for NPS at 13,

²⁶ Conor Hollingsworth, *Norfolk residents push for the re-opening of the Berkley Neighborhood Center*, WTKR.COM, https://www.wtkr.com/news/in-the-community/norfolk/norfolk-residents-push-for-the-re-opening-of-the-berkley-neighborhood-center

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²⁷ See Closure and Consolidation Plan Norfolk Public School Buildings,

https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf.

²⁸ See Appendix A; Closure and Consolidation Plan Norfolk Public School Buildings, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf.



travel around two miles—to "Larchmont (1.7 miles [away])" or" Willard (2.4 miles [away])"—just to access their nearest elementary school.²⁹

If the Board intends "to promote diversity and reduce concentrations of poverty" it should not close schools listed in the School Closure Plan with racially diverse, non-white student populations.³⁰ The Board should instead ensure that racially diverse schools that are a majority students of color receive the resources they need to serve students and families. Furthermore, contrary to the stated goal of "reduc[ing] concentrations of poverty," The School Closure Plan could exacerbate generational poverty by forcing a disproportionate share of low-income families to suffer harms associated with school closures.³¹

B. The School Closure Plan Was Made Without Community Input

In places where districts have closed schools without engaging in an adequate community-driven process, families and neighborhoods have suffered. Time and again, decisions to close schools without sufficient community input have triggered mass opposition, including heated campaigns, walkouts, protests, and even hunger strikes. ³² For historically marginalized communities, school closures sow distrust and disillusionment in institutions like public schools and the democratic process. ³³

Unfortunately, the process that the Board has pursued thus far is out of alignment with NPS's stated commitment to community input. In February 2024, Superintendent Sharon Byrdsong presented a plan to "[e]mbark upon a robust community engagement plan in SY2024-2025... to design the framework for development of future [school closure] recommendations" that would include a "Community Steering Committee," "community meetings," "focus groups," "direct mail," "surveys," "print and electronic communications," and "supporting resources such as meeting facilitators." However, there is no indication that any aspect of this plan began until

"more substantial" for students "from economically disadvantaged families").

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 ²⁹ See Closure and Consolidation Plan Norfolk Public School Buildings,
 https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf.
 ³⁰ See Norfolk Public Schools, NPS Strategic Plan, https://www.npsk12.com/Page/19517.

³¹ See, e.g., Jeonghyeok Kim, The Long Shadow of School Closures: Impacts on Students' Educational and Labor Market Outcomes, Working Paper No. 24-963 at 3, (May 2024), https://edworkingpapers.com/sites/default/files/ai24-963.pdf (finding that negative effects of school closures are

³² See, e.g., Jesse Hagopian, Seattle Planned to Close Up to 21 Public Schools — Here's How We Stopped Them, TRUTHOUT (Dec. 17, 2024), https://truthout.org/articles/seattle-planned-to-close-up-to-21-public-schools-heres-how-we-stopped-them/; Eve L. Ewing, The Fight for Dyett: How a Community in Chicago Saved Its Public School, AM. EDUCATOR (Spring 2019), https://www.aft.org/ae/spring2019/ewing.

³³ SALLY A. NUAMAH, CLOSED FOR DEMOCRACY: How MASS SCHOOL CLOSURE UNDERMINES THE CITIZENSHIP OF BLACK AMERICANS at 137 (2023) (noting that school closure decisions play a fundamental role "in upholding or undermining the democratic citizenship of Black Americans.").

³⁴ See Norfolk Public Schools, Superintendent's Proposed Operating Budget for FY2025 at 32 (Feb. 7, 2024), https://www.npsk12.com/cms/lib/VA02208074/Centricity/Domain/722/Budget%20Superintendents%20Budget%20Presentation%20V2%20Feb%202024%20%20FINAL.pdf.



after the March 2025 Council Resolution. As a result, any attempts at or gestures toward community engagement were compressed into a six-month period. During this period, NPS launched only one five-question survey, held two steering committee meetings, four community meetings led by their paid consultant, and two listening sessions that were poorly attended because they were discreetly placed at a city-wide back-to-school event.

Meanwhile, the NPS website contained no information about school closures, or even that a plan to close schools was underway until September 11, less than a week before a vote on the School Closure Plan was scheduled and nearly two months after the July 8 Retreat.³⁵ As of the date of this letter, the NPS website homepage contains no information about school closures, despite a the plan to vote on the School Closure Plan on October 15, 2025. The Educational and Facilities Planning Advisory Committee—which has a vague name that fails to convey that its jurisdiction covers school closures—has held only **two** public meetings and **one** community meeting on whether to permanently close neighborhood schools.³⁶

Voting to approve the School Closure Plan after such a flawed process risks damaging NPS's reputation and trust with Norfolk families. The Board should abandon the School Closure Plan completely and restart a new process that meaningfully engages stakeholders to address budgetary or enrollment concerns the district is facing.

III. Research Shows that School Closures are Ineffective and Harmful

A wealth of research shows that school closures often fail to resolve budget concerns and demonstrably harm students and communities.

A. School Closures Do Not Have a Record of Resolving Budget Concerns

Although the Council Resolution claims that closing schools is fiscally necessary, the Board has not shared any evidence that closing schools will save money or address any issues raised by NPS's budget forecasts. The one-page cost savings breakdown³⁷ provides only a list of the staff roles for each elementary school and NPS's cost to employ them. The breakdown does

³⁵ See Norfolk Public Schools, School Board's Educational and Facilities Planning Advisory Committee, https://www.npsk12.com/domain/7979 (last visited Sept. 17, 2025) (omitting any mention that certain schools are being considered for closure).

³⁶ See id. Indeed, NPS approach to community engagement copies worst practices from other school districts while lowering standards for soliciting public input. For example, Pittsburgh Public Schools ("PPS") similarly used intentionally vague language, held meetings during summer months when families are less likely to follow school district news, and failed to record meetings for those who were unable to attend. But in contrast, PPS held approximately 13 events over the summer compared to the three meetings of the NPS Board—making it even less likely that NPS families would have an opportunity to provide meaningful input. See 412 Justice, Open Letter to PPS (Jul. 22, 2024), https://412justice.org/open-letter/.

³⁷ See Cost Savings Breakdown per Elementary School Closure, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLCRNL6ED120/\$file/ES%20Cost%20Savings%20Breakdown.pdf.

not detail how this would result in cost savings or balance the budget. Indeed, the document implies that some positions may be "moved for use in other schools"—meaning potential cost savings could be decreased or eliminated. Moreover, research on past school closures indicates that "savings are often overestimated while additional costs—such as for transportation and preparing receiving schools to accommodate students from closed buildings—are underestimated" by school district leaders. ³⁸ NPS has provided no estimated costs to transport students, accommodate students in new buildings, or provide the additional academic and emotional supports that students who experience school closure would require.

Additionally, school districts routinely fail to account for the extent to which closing a neighborhood school will result in students leaving the district altogether, further fueling enrollment declines and worsening budget shortfalls.³⁹ The School Closure Plan assumes that families will willingly travel close to two miles to access a new assigned public elementary school.⁴⁰ NPS has yet to publicly share a detailed budget or attendance projections that account for enrollment and revenue loss that could result from school closures.

B. School Closures Harm Children, Families, and Neighborhoods

Schools are vital institutions in thriving neighborhoods, often serving as "the anchors of communities, the hubs of local activity, the source of immense community pride, and a powerful reminder of shared history."⁴¹ Closing schools is demonstrably harmful to children and families, particularly those in communities who face structural racism.⁴² For instance, school closures are

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³⁸ See Mary Eddins, Maja Pehrson, and Kevin Burgess, *Revisiting Research on School Closings: Key Learnings for District and Community Leaders*, PENN. CLEARINGHOUSE FOR EDUC. RES. at 5 (Jun. 2024), https://www.researchforaction.org/wp-content/uploads/2024/06/revisiting-research-on-school-closings-key-learnings-for-district-and-community-leaders.pdf.

³⁹ For instance, in San Antonio Independent School District, where the school board approved a mass-school closure to cut costs and address enrollment decline, data indicates that at least 10% of students whose schools closed left the district. Camille Phillips, 10% of students impacted by San Antonio ISD's school closures are leaving the district, TEXAS PUB. RADIO (Mar. 20, 2024), https://www.tpr.org/education/2024-03-20/10-of-students-impacted-by-san-antonio-isds-school-closures-are-leaving-the-district.

⁴⁰ For instance, one version of the School Closure Plan would have some families at Chesterfield Academy travel up to 1.9 additional miles to a new school *See* July School Closure Recommendations at 2.

⁴¹ Journey for Justice Alliance, Death by a Thousand Cuts at 20 (May 2014), https://dignityinschools.org/wp-content/uploads/2018/07/J4J 1000 Cuts.pdf.

⁴² See, e.g., Eddins, supra n.38 at 3–4 (summarizing academic research on impacts of school closures); Monique Alexander & Vanessa A. Massaro, School Deserts: Visualizing The Death Of The Neighborhood School, 18 POLICY FUTURES IN EDUC., 787 (Sept. 30, 2020), https://doi.org/10.1177/1478210320951063 ("Students who are not local to their school face a range of challenges in attending school and participating in extracurricular activities. It also becomes more difficult for parents to participate in school activities and build community around their children.").



associated with a reduction in high school graduation and college attendance, declines in student attendance, worsened behavioral outcomes, and even decreased adulthood earnings.⁴³

Moreover, research shows that a school's enrollment size does not correspond to the quality of education it provides. 44 Elementary schools across the country traditionally and commonly enroll 200 to 300 students and are frequently even smaller. 45 Schools with smaller class sizes that are within walking distance are the two common traits of neighborhood elementary schools that communities have long treasured. Relatedly, small class sizes have been shown to improve education for students, and many families have long sought small class and school environments for their children. 46 Altogether, school closures have a well-documented record of exacerbating segregation and inequity in cities, and no record of improving the lives of Black families and communities.

IV. Well-Resourced Community Schools Deliver for Students and Families

It is well-established that sustained investment in public schools and evidence-backed programs and services improve the lives of students and their families⁴⁷ and that local schools are much more than academics—they are pillars of communities and neighborhoods. Recognizing this, organizers developed Sustainable Community Schools—public schools that meet the needs of all members of the community and provide engaging and culturally relevant curricula, high quality teaching, wraparound support services, positive discipline and restorative justice, and

⁴³ See, e.g., Kim, supra n.31 at 25–28; Matthew F. Larsen, Does closing schools close doors? The effect of high school closings on achievement and attainment, 76 ECON. OF EDUC. REV. (June 2020), https://www.sciencedirect.com/science/article/abs/pii/S0272775718305922?via%3Dihub.

⁴⁴ For instance, during the 2000s, New York City Mayor Michael Bloomberg instituted mass school closures of traditional high schools, arguing that students would perform better academically if they attended "small schools." Years of academic research on the impacts of experiencing a school closure and attending a "small school" reveal that the outcomes are decidedly mixed and do not support the claim made by proponents of this policy that school size was related to academic performance. See Matt Barnum, New York City's Experiment With Small High Schools Helped Students Stay In College, Study Shows, CHALKBEAT (Apr. 10, 2019), https://www.chalkbeat.org/2019/4/10/21121033/new-york-city-s-experiment-with-small-high-schools-helped-students-stay-in-college-study-shows/.

⁴⁵ See, e.g., National Center for Educ. Stat., Number Of Regular Operating Public Elementary And Secondary Schools And Average Student Membership, By School Level, And State Or Jurisdiction: School Year 2022–23, https://nces.ed.gov/ccd/tables/202223_summary_4.asp; Public Elementary Schools, By Grade Span, Average School Enrollment, And State Or Jurisdiction: 2018-19, https://nces.ed.gov/programs/digest/d20/tables/dt20_216.75.asp; Public elementary schools, by grade span, average school enrollment, and state or jurisdiction: 2016-17, https://nces.ed.gov/programs/digest/d18/tables/dt18_216.75.asp.

⁴⁶ See, e.g., Valerie Strauss, Why A New Attack On Small Class Size Doesn't Add Up, WASHINGTON POST (Sept. 26, 2023), https://www.washingtonpost.com/education/2023/09/26/new-attack-small-class-size-doesnt-addup/; Matt Barnum, Does class size really matter? A Chalkbeat look at the research., CHALKBEAT (Jun. 10, 2022), https://www.chalkbeat.org/2022/6/10/23162544/class-size-research/.

⁴⁷ See, e.g., EDUC. L. CEN., Money Matters: Evidence Supporting Greater Investment in PK-12 Public Education. (March 2023),

https://edlawcenter.org/assets/files/pdfs/School%20Funding/Money%20Matters%20Talking%20Points.pdf.



transformational parent and community engagement.⁴⁸ Community Schools are designed to meet the specific needs of the communities they serve by collaborating and sharing decision-making with families and local service providers.⁴⁹ Community Schools exist in districts throughout the country⁵⁰—including in the state of Virginia,⁵¹ are evidence-backed,⁵² improve academic and life outcomes for students, and meet the needs of whole school communities.⁵³

In 2024, NPS took a step in the right direction and piloted Equity and Excellence Learning Centers ("EELCs") at Jacox Elementary, P.B. Young Elementary, Ruffner School, and Booker T. Washington High School.⁵⁴ However thus far, the EELCs have focused on contracted services to provide additional resources to the school community, rather than efforts to share governance with parents and community members or leveraging existing community resources. And alarmingly, the School Closure Plan would close P.B. Young Elementary only two years after piloting an EELC there.⁵⁵ Rather than eliminating access to local public schools for Black and low-income communities and jumping to measures that are proven to harm students and families, the Board should make existing schools welcoming and attractive places for all families by bringing sustainable community schools to Norfolk.

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⁴⁸ See Journey for Justice Alliance, Sustainable Community Schools, https://j4jalliance.com/history-2/.

⁴⁹ See Learning Policy Institute, Community Schools Forward,

https://learningpolicyinstitute.org/project/community-schools-forward.

50 See Emily Germain et al., Community Schools Certification: An Approach For Implementation

⁵⁰ See Emily Germain et al., Community Schools Certification: An Approach For Implementation, LEARNING POLICY INSTITUTE (2025), https://doi.org/10.54300/220.412.

⁵¹ See, e.g., Communities In Schools Virginia, https://cisofva.org/; Thad Green, Communities In Schools Of Chesterfield Adds Two Schools To Program For Low-Income Students, RICHMOND TIMES DISPATCH (Aug. 19, 2023), https://richmond.com/news/local/education/article 173a32d2-3c64-11ee-8487-07d17b525b26.html.

⁵² See, e.g., Hayin Kimner, Moving Community Schools Forward With Foundational Resources, BROOKINGS (Jan. 12, 2023), https://www.brookings.edu/articles/moving-community-schools-forward-with-foundational-resources/; Illustrating the Promise of Community Schools; William R. Johnston, et al., An Assessment of the Impact of the New York City Community Schools Initiative, RAND (Jan. 28, 2020), https://www.rand.org/pubs/research reports/RR3245.html.

⁵³ See, e.g., Neil Naftzger, Jill Young, & Dominique Bradley, Community Schools and the Science of Learning and Development; What We Are Learning From the Chicago Public Schools Community Schools Initiative, AMERICAN INSTITUTES FOR RESEARCH (Mar. 2021), https://www.air.org/sites/default/files/Community-Schools-and-SoLD-March-2021.pdf.

⁵⁴ See Madie MacDonald, NPS To Host Free Expo To Showcase New Equity And Excellence Learning Centers, WAVY (Sept. 3, 2024), https://www.wavy.com/news/local-news/norfolk/nps-to-host-free-expo-to-showcase-new-equity-and-excellence-learning-centers/; Norfolk Public Schools, Equity and Excellence Learning Centers Overview.

 $[\]frac{https://www.npsk12.com/cms/lib/VA02208074/Centricity/Domain/7939/Revised\%20EELCS\%20Overview\%2009_2024.pdf.$

⁵⁵ See Closure and Consolidation Plan Norfolk Public School Buildings, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf.

ADVANCEMENT Project

In conclusion, we urge the Board to **vote NO on the School Closure Plan** and embark on a community-driven process to ensure that existing schools meet the needs of their school communities.

Sincerely,

/s/Adaku Onyeka-Crawford Director, Opportunity to Learn Program Advancement Project

/s/Laura Petty Staff Attorney Advancement Project



V. APPENDIX: Demographic Information of Schools Included in the School Closure Plan

The charts below reflect the schools included the School Closure Plan.⁵⁶ The charts display the district-wide percentage of Black, Latine, white students, and students living in poverty compared to the percentages at each of the schools slated for closure or repurposing in the School Closure Plan listed. The percentages are calculated based on enrollment data from the National Center for Education Statistics.⁵⁷ Additionally, to provide information about whether school closures would be concentrated in Black neighborhoods, the charts display the percentage Black population of Norfolk as a whole compared to the Black population in the Census tract where each school building is located.⁵⁸ The percentages in the row corresponding with each school represent the percentage point difference above or below the NPS-wide (in the final column, citywide) share of each category.

Although the School Closure Plan ostensibly would close nine or ten schools, the schools designated as "repurposed" in the various versions—St. Helena Elementary, Lindenwood Elementary, Chesterfield Academy, Monroe Elementary, and Oceanair Elementary—would also effectively be closed, and are therefore designated as "schools to close" in the charts below. 59 Additionally, although the Ghent School would purportedly be closed under several versions of the School Closure Plan, those plans concede that Ghent would actually be moved into a new building. 60 As such, it is included in the chart labeled Schools to be Renovated or Rebuilt Under the School Closure Plan.

A. Schools to Close Under the School Closure Plan

As the chart below shows, all but two of the schools that the Board plans to close in the School Closure Plan have a Black student population that is above the NPS average and only one of the schools has a white student population above the NPS average. Additionally, all three schools lacking student data that the Board plans to close are located in neighborhoods with a higher Black population than the city average.

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⁵⁶ See Closure and Consolidation Plan Norfolk Public School Buildings, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DLYNLL60773F/\$file/Sep29th%202025-2030%20Plan.pdf. For more detail, see July School Closure Recommendations, *supra* n.2, which are substantially similar to the School Closure Plan but provide more detail.

⁵⁷ See National Center for Education Statistics (NCES), Norfolk City, https://nces.ed.gov/ccd/schoolsearch/school_list.asp?Search=1&DistrictID=5102670 (School Year 2023-24).

⁵⁸ Census tract data available at Urban Renewal Center, Black Wealth in Norfolk (Aug. 28, 2024), https://storymaps.arcgis.com/stories/8817f36f631f42ef81cfa68b26ba349f (scroll down to map feature).

⁵⁹ See Norfolk Public Schools, Envisioning a new portfolio of schools for NPS at 13; July School Closure Recommendations, *supra* n.2.

⁶⁰ See id.

Sch	ool Name	% Black Students	% Latine Students	% White Students	% Students Living in Poverty ⁶¹	% Black Population in Census Tract
District-wide		40%	9%	42%	62%	40% citywide ⁶²
1.	P.B. Young Elementary	+52%	-5%	-40%	+23%	+50%
2.	Berkley- Campostella Early Childhood Center	+47%	-4%	-37%	Figure not available on NPS site	+46%
3.	St. Helena Elementary	+47%	-5%	-39%	+26%	+49%
4.	Chesterfield Academy	+47%	-2%	-42%	+20%	+45%
5.	Lindenwood Elementary	+35%	+1%	-34%	+13%	+40%
6.	Monroe Elementary ⁶³	+35%	-2%	-32%	+10%	+31%
7.	Norview Elementary	+25%	+11%	-34%	+10%	+25%
8.	Oceanair Elementary	+3%	+18%	-24%	+15%	-6%
9.	Granby Elementary	+19%	0%	-24%	+7%	-13%
10.	Willoughby Early Childhood Center	-1%	+15%	-18%	Figure not available on NPS site	-18%
11.	Tarrallton Elementary	-21%	+1%	+12%	-43%	-31%
12.	Southeastern Cooperative Educational Programs Facility ⁶⁴	N/A	N/A	N/A	N/A	+46%

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⁶¹ Figures display NPS's measure of concentrated poverty, which is the percentage point difference of the number of students at each school living in poverty from the district-wide share, which is 62%. *See* Norfolk Public Schools, Strategic Plan, Concentration of Poverty, https://www.npsk12.com/Page/19665.

⁶² Citywide figure available at U.S. Census Bureau, Norfolk City, VA, https://data.census.gov/profile/Norfolk city, Virginia?g=050XX00US51710#populations-and-people.

⁶³ The School Closure Plan identifies Monroe Elementary to be repurposed, but elaborates that Monroe will be closed, all its students will be relocated, and the facility will be rebuilt as a new school building for the Ghent School. *See also* July School Closure Recommendations

⁶⁴ No student data available.

13. Norfolk Technical	N/A	N/A	N/A	N/A	+11%
Center ⁶⁵					
14. Madison	N/A	N/A	N/A	N/A	+10%
Alternative					
Center ⁶⁶					

B. School to Turn into a Schoolwide Career and Technical Program

As the chart below shows, Lake Taylor High School, which would be transformed into a comprehensive career and technical education program, serves a disproportionately higher share of Black and Latine students and students living in poverty and disproportionately lower share of white students than the NPS average.

School Name	% Black Students	% Latine Students	% White Students	% Students Living in Poverty	% Black Population in Census Tract
District-wide	40%	9%	42%	62%	40% citywide
Lake Taylor High School	+27%	+5%	-31%	+8%	-14%

C. Schools to be Renovated or Rebuilt Under the School Closure Plan

As the chart below shows, all but one of the schools that will get new or renovated facilities under the plan are located in *neighborhoods* that have significantly smaller Black populations than the city average, while three of the five schools that would benefit from renovations under the School Closure Plan have significantly lower shares of students living in poverty compared to the District-wide average.

Additionally, Board documents suggest that there may be future plans to close, rather than renovate Jacox Elementary—the only school in the chart below that predominantly serves Black students and is located in a predominantly Black neighborhood—which is nevertheless included in the chart below due to lack of clarity.⁶⁷

School Name	% Black	% Latine	% White	% Students	% Black
	Students	Students	Students	Living in	Population
				Poverty	in Census
					Tract

⁶⁵ No student data available.

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⁶⁶ No student data available.

⁶⁷ According to the July School Closure Recommendations, the Board plans to "[w]ork with the city to explore potential rebuild on an adjacent property for a land swap." In other words, the Board has no plans yet to rebuild Jacox and is considering ceding the property where Jacox Elementary is located to the City. *See* July School Closure Recommendations, *supra* n.2 at 15

District-wide	40%	9%	42%	62%	40% citywide
C 11 D : 4	70/	+110/	70/	4.40/	
Sewells Point	-7%	+11%	-5%	-44%	-36%
Elementary ⁶⁸					
Ghent	+3%	-4%	0%	-28%	-35%
School ⁶⁹					
Maury High	+15%	0%	-15%	-12%	-24%
School					
Suburban	+25%	+7%	-33%	+8%	-8%
Park					
Elementary					
Jacox	+52%	-4%	-41%	+27%	+48%
Elementary					

⁶⁸ A "roof replacement" is "in process" during summer 2025. See July School Closure Recommendations at 10.

⁶⁹ Although the School Closure Plan identifies the Ghent School to be "closed," it explains that Ghent will be rebuilt and reopened at the Monroe Elementary School site. See July School Closure Recommendations at 2–3; Norfolk Public Schools, Envisioning a new portfolio of schools for NPS at 13, https://go.boarddocs.com/vsba/nps/Board.nsf/files/DL7P4G62C89C/\$file/School%20Consolidation%20Presentation

[.]pdf.