



**LOUISIANA**

**ADVANCEMENT  
PROJECT**

**ASAP**  
ALL STREETS ALL PEOPLE



April 7, 2026

Don Little, President  
Caddo Parish School Board  
8 Tealwood Street  
Shreveport, LA 71104

Keith S. Burton, Superintendent  
Caddo Parish Public Schools  
1961 Midway Avenue  
Shreveport, Louisiana 71108

*SENT VIA EMAIL*

Dear President Little & Superintendent Burton:

We, All Streets All People (“ASAP”), Step Up Louisiana, the Peoples’ Promise Youth Division, the Southern Poverty Law Center (“SPLC”), Advancement Project, concerned families, and community members oppose the closure of 81st Street Early Childhood Education Center (“81st Street”) without any plan to ensure that children will receive the same education and services at their new assigned school. For the reasons below, we demand that the Caddo Parish School Board (“the Board”) reverse its decision to close 81st Street. Alternatively, we demand that Caddo Parish Public Schools (“the District”) communicate and implement a robust transition plan to ensure current 81st Street students will be cared and provided for at their new school and that the District meets its obligations under federal and state education and disability law.

**I. Background**

The Board has a long history of discrimination against Black students and families,<sup>1</sup> including by disproportionately closing schools in Black neighborhoods. For example, after a federal court ordered the District to desegregate in 1973, the Board voted to close 12 of the 27 schools serving Black children.<sup>2</sup> In 1981, a federal court ordered the District to enhance educational offerings at schools predominantly serving Black children.<sup>3</sup> Instead, in the years since, the Board and the District have moved to close, rather than improve, several of these schools—while deepening segregation. On May 7, 2024, the Board voted to close Werner Park Elementary (92 percent Black),

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<sup>1</sup> See, e.g., *Jones v. Caddo Par. Sch. Bd.*, 421 F.2d 313, 314 (5th Cir. 1970) (documenting the Board’s repeated non-compliance with court orders to desegregate schools); Brenda Teele, *Separate and not equal: Fight for school desegregation in Caddo Parish*, KTBS (Jul. 15, 2025), [https://www.ktbs.com/70th-anniversary/separate-and-not-equal-fight-for-school-desegregation-in-caddo-parish/article\\_8b08d6cd-6995-4b13-bbe8-39322b4adc0f.html](https://www.ktbs.com/70th-anniversary/separate-and-not-equal-fight-for-school-desegregation-in-caddo-parish/article_8b08d6cd-6995-4b13-bbe8-39322b4adc0f.html) (documenting Black students’ experiences of racist hatred by white teachers and classmates in Caddo Parish Public Schools during 1960s).

<sup>2</sup> See, e.g., *Jones v. Caddo Par. Sch. Bd.*, 499 F.2d 914, 916 (5th Cir. 1974) (“there are some one-race schools remaining in Caddo Parish under the plan of desegregation adopted by the District Court”).

<sup>3</sup> See *Jones v. Caddo Par. Sch. Bd.*, 65 Civ. 11065 (May 7, 1981), <https://clearinghouse.net/doc/85962/>.

Sunset Acres Elementary (92 percent Black) and Fair Park Middle (92 percent Black).<sup>4</sup> On April 15, 2025, the Board voted to close three schools: 81st Street, Queensborough Elementary, and Blanchard Elementary. Students from 81st Street (86 percent Black) would be assigned to Atkins Technology Elementary School (92 percent Black) and students from Queensborough (91 percent Black) would be reassigned to J.S. Clark Elementary (93 percent Black), a vocational school designed to funnel students into a career in the trades rather than pursue college.<sup>5</sup> Students from Blanchard (67 percent white) would be assigned to Donnie Bickham Middle School (47 percent white), where a brand new PreK-2nd grade wing will be constructed for them.<sup>6</sup> In sum, even though just under half of students in the District are Black,<sup>7</sup> all except one of the schools (Blanchard) closed since 2024 is majority Black. To add insult to injury, the District that it has provided *no* notice to 81st Street families of the coming closure.<sup>8</sup>

In addition, the District has failed to communicate how it will continue to provide services that are legally required under federal law. Specifically, 81st Street serves students entitled to special educational services under the Individuals with Disabilities Education Act (“IDEA”), 20 U.S.C. § 1400; Section 504 of the Rehabilitation Act (“Section 504”), 29 U.S.C. § 794; and Title II of the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12131. 81st Street families have voiced informed concerns that Atkins is not equipped to provide the services to which their children are

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<sup>4</sup> See Caddo Parish School Board Meeting Minutes Volume XXXXV, May 7, 2024 CPSB Special Session, [https://files-backend.assets.thrillshare.com/documents/asset/uploaded\\_file/2615/Cpps/29f5eeb6-bfbf-40f7-82b8-744a10c1b725/CPSB-Meeting-Minutes-January-8-2024-to-Present.pdf?disposition=inline](https://files-backend.assets.thrillshare.com/documents/asset/uploaded_file/2615/Cpps/29f5eeb6-bfbf-40f7-82b8-744a10c1b725/CPSB-Meeting-Minutes-January-8-2024-to-Present.pdf?disposition=inline).

<sup>5</sup> See Nat’l. Cen. Educ. Stat., J. S. Clark Elementary School, [https://nces.ed.gov/ccd/schoolsearch/school\\_detail.asp?Search=1&DistrictID=2200300&SchoolPageNum=2&ID=220030002336](https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&DistrictID=2200300&SchoolPageNum=2&ID=220030002336). See also Victoria Garnes, *Community members filled J.S. Clark Elementary auditorium to support school’s K-8 transition*, SHREVEPORT BOSSIER CITY ADVOCATE (Feb. 25, 2025), [https://www.shreveportbossieradvocate.com/news/community-members-filled-j-s-clark-elementary-auditorium-to-support-schools-k-8-transition/article\\_2483ca48-f36f-11ef-a93d-933ed6117663.html](https://www.shreveportbossieradvocate.com/news/community-members-filled-j-s-clark-elementary-auditorium-to-support-schools-k-8-transition/article_2483ca48-f36f-11ef-a93d-933ed6117663.html). We believe that Black children deserve to pursue their educational interests and whatever career path they choose—in blue-collar trades, white-collar jobs, and everywhere in between. But the Board’s vote would make it so Black children as young as 5-years-old should only expect careers in the trades and no opportunity to attend college.

<sup>6</sup> See Nat’l. Cen. Educ. Stat., Queensborough Elementary School, [https://nces.ed.gov/ccd/schoolsearch/school\\_detail.asp?ID=220030000188](https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?ID=220030000188); Nat’l. Cen. Educ. Stat., Blanchard Elementary School, [https://nces.ed.gov/ccd/schoolsearch/school\\_detail.asp?Search=1&DistrictID=2200300&ID=220030000145](https://nces.ed.gov/ccd/schoolsearch/school_detail.asp?Search=1&DistrictID=2200300&ID=220030000145).

<sup>7</sup> See Nat’l. Cen. Educ. Stat., Caddo Parish School District, Louisiana, <https://nces.ed.gov/Programs/Edge/ACSDashboard/2200300>.

<sup>8</sup> See Caddo Parish Public Schools, Response to Document Requests (Mar. 20, 2026) (Attached as Appendix A) (“Request 1: Any and all documents, including District communications, issued to parents notifying them of the closure of 81st Street ECE, disseminated during the time period of January 2025 to present. Response 1: There is not a document responsive to your request. The district historically sends parent letters regarding closures, consolidations, etc., at the conclusion of the last school year of operations for the campus.”).



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entitled.<sup>9</sup> As of the date of this letter, the District has declined to broadly respond to questions and concerns raised by 81st Street families about the continuation of services at Atkins.<sup>10</sup>

State law requires bus transportation only if a student “resides more than one mile from such school” unless the “the school board determines that conditions exist to warrant such transportation.”<sup>11</sup> Atkins Elementary is 0.9 miles and across Interstate 49 from 81st Street, and 81st street families who live less than one mile from Atkins but would be required to walk across the Interstate if the Board does not offer bus transportation. Yet the District has not communicated to 81st Street families whether transportation will be provided and admitted that “no routes have been developed for the 2026-2027 school year.”<sup>12</sup> The District must ensure that no students would be required to walk across a busy highway to access their school and communicate a bus transportation plan to 81st Street families.

**II. Applicable Legal Obligations**

The IDEA obligates the District to create an Individualized Educational Plan (“IEP”) for each eligible student<sup>13</sup> and follow the terms agreed upon in each IEP.<sup>14</sup> IEP services must be “provided in a coordinated and collaborative manner by the key ‘stakeholders;’” and demonstrate “positive academic and non-academic benefits.”<sup>15</sup>

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<sup>9</sup> See, e.g., Letter from Librarian Keisha Rose to the School Board Opposing the Closure of 81st Street, <https://docs.google.com/document/d/1gDYcCDgMH0dcq4bGEBqRcqa1L25WIM3b/edit>; Petition to Keep 81st Street Early Childhood Education Center Open, to Keep 81st Street Early Childhood Education Center Open, [https://docs.google.com/document/d/1hohpy3ZPESkicnZs9SOC\\_hbb0PHvmsFr/edit](https://docs.google.com/document/d/1hohpy3ZPESkicnZs9SOC_hbb0PHvmsFr/edit); Board Minutes from the Board Executive Committee Work Session at 3 (Apr. 1, 2025) (multiple speakers in opposition to closure of 81st Street).

<sup>10</sup> See Caddo Parish Public Schools, Response to Document Requests (Mar. 20, 2026) (Attached as Appendix A) (“Request 3: All documents and communications regarding any plan or transition plan to address the needs of students with disabilities who will attend Eighty-First Street ECE in the 2025-2026 school year but who will transfer to Atkins Elementary in the 2026-2027 school year. Response 3: There is not a document responsive to your request. All such discussions would take place as part of an individual student’s Individual education plan (IEP) process.”).

<sup>11</sup> La.R.S. 17:158(A)(1).

<sup>12</sup> See Appendix A (“Request 8: All documents, including communications, regarding Caddo Parish School Board’s plan for transportation of students attending 81st Street ECE and Atkins Elementary, for the 2026-2027 and 2027-2028 school years, including plans specific to students with disabilities. Response 8: Caddo Parish School Board Policy EDD provides the guidance for all transportation within the parish as well as students’ IEPs. While no routes have been developed for the 2026-2027 school year at this time, the district will follow Board policy as well as state and federal laws regarding transportation.”).

<sup>13</sup> *Endrew F. ex rel. Joseph F. v. Douglas Cnty. Sch.* 580 U.S. 386, 391 (2017).

<sup>14</sup> See, e.g., *Klein Indep. Sch. Dist. v. Hovem*, 690 F.3d 390, 395 (5th Cir. 2012) (citing 20 U.S.C. § 1414(d)(2)(A)) (“Once school officials and parents agree on the IEP, the school district must put it into effect.”).

<sup>15</sup> *R.C. ex rel. S.K., D.H. v. Keller Indep. Sch. Dist.*, 958 F. Supp. 2d 718, 730 (N.D. Tex. 2013) (citing *Cypress-Fairbanks Indep. Sch. Dist. v. Michael F. by Barry F.*, 118 F.3d 245, 253 (5th Cir. 1997)).

Additionally, Section 504 obligates districts to provide students with “reasonable modifications to existing practices in order to accommodate” their disabilities, memorialized in Section 504 Plans.<sup>16</sup> Knowledge of a Section 504 Plan coupled with refusal to provide the accommodations therein may give rise to a school district’s intentional liability under Section 504.<sup>17</sup> Finally, Title II of the ADA prohibits “discrimination by public entities, including schools” on the basis of disability.<sup>18</sup>

### III. Failure to Ensure Continuity and Adequacy of Services Risks Legal Liability

School closures harm students, disrupt educational experiences, and hinder educational access and opportunity. School closures are associated with lower rates of high school graduation and college attendance, declines in student attendance, worsened behavioral outcomes, and even decreased adulthood earnings.<sup>19</sup> Because moving to a new school is disruptive to a child’s education, school districts should hold an IEP transition meeting for each student transferring to a new school.<sup>20</sup> Additionally, school districts should spend the year prior to a school closure ensuring that staffing, facilities, equipment, and resources will be adequate to continue to provide services incoming students need and are entitled to under law.

However, since the Board voted to close 81st Street in April 2025, the District admits it has failed to notify families about the upcoming closure at the end of the school year.<sup>21</sup> Additionally, as of the date of this letter (roughly six weeks prior to the last day of school),<sup>22</sup> upon information and belief, the District has failed to affirmatively schedule a transition conference with any 81st Street family. In sum, the District has failed to: 1) meet with parents of children with IEPs to discuss how the school closure and transition to a new school will affect their child’s IEP; 2) assure that they will continue to provide a Free Appropriate Public Education (“FAPE”) and equal educational opportunity to students with disabilities; or 3) share any plans to continue providing the services that students need and are entitled to under applicable law. Indeed, the District’s inadequate response to SPLC’s records request suggests that the District may not even have an account of

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<sup>16</sup> See, e.g., *McDavid v. Houston Indep. Sch. Dist.*, 2021 WL 4555241, at \*2 (S.D. Tex. Oct. 5, 2021) (quoting *Fry v. Napoleon Cmty. Schs.*, 137 S. Ct. 743, 749 (2017)) (cleaned up).

<sup>17</sup> See, e.g., *S.C. v. Round Rock Indep. Sch. Dist.*, 2021 WL 196684, at \*4 (W.D. Tex. Jan. 19, 2021).

<sup>18</sup> *Lartigue v. Northside Indep. Sch. Dist.*, 100 F.4th 510, 514 (5th Cir. 2024).

<sup>19</sup> 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 25–28, (May 2024),

<https://edworkingpapers.com/sites/default/files/ai24-963.pdf>; 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>.

<sup>20</sup> For instance, 34 C.F.R. § 300.324(b)(ii)–(D) requires that an IEP be revised “as appropriate, to address . . . The child’s anticipated needs.”

<sup>21</sup> See Appendix A (Responses 1 and 3).

<sup>22</sup> The last day of school for District students is May 21, 2026. See the Board Calendar 2025–2026, [https://cebyrd.com/wp-content/uploads/2025/07/the Board\\_Calendar\\_2025-2026.pdf](https://cebyrd.com/wp-content/uploads/2025/07/the Board_Calendar_2025-2026.pdf).

how many students entitled to services mandated under the IDEA and Section 504 currently attend 81st Street or have an estimate of how many additional students will need to be accommodated at Atkins if 81st Street closes.<sup>23</sup>

If unaddressed, this carelessness for the well-being, education, and legal rights of the mostly Black families who attend 81st Street could add another chapter to the District's legacy of discrimination.

#### **IV. Demands**

Due to the Board's failure to communicate with or plan for 81<sup>st</sup> Street families, we demand that the Board and the District:

1. cease all actions, plans, and activities to close 81st Street, including but not limited to: transferring student files; reassigning students to a different school; reassigning 81st Street employees and staff to other schools in the district; changing transportation routes; terminating 81st Street employees and staff; eliminating or moving movable property from the premises of 81st Street;
2. keep 81st Street open permanently, or at a minimum for the 2026-2027 school year, for the District to hold transition meetings and solicit and include input from 81st Street families to ensure a seamless transition and maintenance of legally required educational services;
3. keep 81st Street open permanently, or at a minimum for the 2026-2027 school year, for the District to share a transition plan for each student with an IEP or 504 plan to ensure that students receive the services to which they are legally entitled upon the closure of 81st Street.

#### **V. Notice to Preserve Evidence**

We request that you preserve and not alter any evidence relating to the Board's decision to close 81st Street, including, but not limited to: communications about the decision to close 81st Street; all reports, studies, data, publications, plans or information gathered or distributed regarding the closure of 81st Street; documents and files to inform the public about the closure of 81st Street.

This preservation is to include any and all word documents or other native file formats with metadata. Such documents subject to preservation include communications, including but not limited to emails, call logs, and text messages, between Caddo Parish School Board members, Caddo Parish School Board staff, and between Caddo Parish School Board staff and outside parties, concerning closing 81st Street.

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<sup>23</sup> See Appendix A (In response to Requests 6 and 7, providing a link to the Board Minutes from the Board Executive Committee Work Session at 3 (Apr. 1, 2025), which does not contain the requested information).



**LOUISIANA**

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We request a response no later than close of business on April 14, 2026.

Sincerely,

Lauren Winkler, Esq.  
Luz Lopez, Esq.  
Camille Pendley Hau, Esq.

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<sup>24</sup> Advancement Project and its representatives sign onto this letter solely in their capacity as public policy advocates and are not acting as legal counsel for any other co-signers of this letter.



**LOUISIANA**

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March 20, 2026

Lauren Winkler  
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201 St. Charles Avenue  
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Dear Ms. Winkler,

In response to your public records request regarding documents related to the closure of Eighty First Street ECE, below is the district's response to your request:

**Request 1:** Any and all documents, including District communications, issued to parents notifying them of the closure of 81<sup>st</sup> Street ECE, disseminated during the time period of January 2025 to present.

**Response 1:** There is not a document responsive to your request. The district historically sends parent letters regarding closures, consolidations, etc., at the conclusion of the last school year of operations for the campus.

**Request 2:** Any and all documents, including District communications, related to requests from parents or community organizations, and/or advocacy groups for meetings with District and 81<sup>st</sup> Street School personnel to discuss the closure of 81<sup>st</sup> Street ECE.

**Response 2:** See the linked [Board Minutes](#) from Spring 2025 meetings of the Caddo Parish School Board, which include documents responsive to your request. Additionally, full video archives of these meetings can be found [here](#). Finally, as part of the communications found [here](#) there are emails and letters responsive to your request.

**Request 3:** All documents and communications regarding any plan or transition plan to address the needs of students with disabilities who will attend Eighty-First Street ECE in the 2025-2026 school year but who will transfer to Atkins Elementary in the 2026-2027 school year.

**Response 3:** There is not a document responsive to your request. All such discussions would take place as part of an individual student's Individual education plan (IEP) process.



**Request 4:** For school years 2025-2026 and 2026-2027, any and all budgets and budget analyses associated with the cost of closing Eighty-First Street ECE.

**Response 4:** There is not a document responsive to your request. The Chief Financial Officer has noted that the closure of an elementary school typically saves the district between \$750,000 and \$1,000,000 annually.

**Request 5:** For school years 2025-2026 and 2026-2027, any and all documents, including but not limited to communications, budgets, bids, and contracts related to Eighty-First Street ECE.

**Response 5:** [Linked](#) you will find the 2025-2026 consolidated annual budget as approved by the Caddo Parish School Board in June 2025. No documents exist responsive to your request for 2026-2027 school year.

**Request 6 and 7:** The anticipated student attendance counts for all Caddo Parish schools for the 2026-2027 school year based on the new attendance zones approved at the April 5, 2025 school board meeting and school closure/consolidation plan disaggregated by:

- a. School;
- b. Race;
- c. Ethnicity;
- d. Disability status; and
- e. English Learner status:

**Response 6 and 7:** A preliminary count is available [here](#). It should be noted that any such counts are subject to change daily as students continue to enroll, transfer, etc.

**Request 8:** All documents, including communications, regarding Caddo Parish School Board's plan for transportation of students attending 81<sup>st</sup> Street ECE and Atkins Elementary, for the 2026-2027 and 2027-2028 school years, including plans specific to students with disabilities.

**Response 8:** Caddo Parish School Board Policy [EDD](#) provides the guidance for all transportation within the parish as well as students' IEPs. While no routes have been developed for the 2026-2027 school year at this time, the district will follow Board policy as well as state and federal laws regarding transportation.

**Request 9 and 10:** The number of certified teachers for the 2025-2026 and 2026-2027 school years disaggregated by:

- a. Grade;
- b. School; and
- c. Certification.



**Response 9 and 10:** Please see the information linked [here](#). The sheet labeled as “Cert Staff” will provide the requested information.

**Request 11, 12, 15, and 16:** The number of social workers employed by the District for 2025-2026 and 2026-2027 school years disaggregated by:

- a. Schools(s) to which they are assigned;
- b. Grades to which they are assigned;
- c. The number of students for which they are responsible; and
- d. FTE.

**Response 11, 12, 15, and 16:** Please see the information linked [here](#). The sheet labeled as “Social Workers” will provide the requested information. Additionally, provided [here](#) you will find the schools to which they are assigned.

**Request 13 and 14:** The number of guidance counselors employed by the district for the 2025-2026 and 2026-2027 school years disaggregated by:

- a. School(s) to which they are assigned;
- b. Grades to which they are assigned;
- c. The number of students for which they are responsible; and
- d. FTE.

**Response 13 and 14:** Please see the information linked [here](#). The sheet labeled as “Counselors” will provide the requested information.

**Request 17 and 18:** The number of teachers, staff, contractors, paraprofessionals, custodians, cafeteria workers, and other staff or personnel who were employed by the Caddo Parish School Board in the 2025-2026 school year and who will not retain their positions for 2026-2027 school year disaggregated by:

- a. Assigned school in the 2025-2026 school year;
- b. Position;
- c. Grade (if applicable); and
- d. Reason for departure.

**Response 17 and 18:** There is not a document responsive to the request.

**Request 19:** All documents and communications regarding the Caddo Parish School Board’s plan for redistribution of staff, including teachers, aides, administrators, paraprofessionals, custodians, cafeteria workers, and any other staff or personnel, after the District closes and consolidates Eighty-First Street ECE.



**Response 19:** There is not a document responsive to the request; however, as indicated in the Board meeting and as practice with each school closure/consolidation, staff members will be reassigned to other positions within the district in alignment with their certification. There is a communication within the [documentation provided](#), which includes the Child Nutrition Department in the beginning stages of planning regarding positions that will be vacant and possible movements/advertisements.

**Request 20:** Any and all documents, including communications, regarding real estate and brokerage services in relation to Eighty-First Street ECE, between January 2022 and present.

**Response 20:** There is not a document responsive to your request.

**Request 21:** Any and all documents, including communication with parents, constituents, or within school board members, about the closure and/or consolidation of Eighty-First Street ECE.

**Response 21:** Within the Communications [documentation provided](#), you will find information responsive to your request.

