

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

JOHN F. KNIGHT, JR., and ALEASE S. SIMS, et al., individually and on behalf of others similarly situated, *

Plaintiffs and Plaintiffs-Intervenors, *

UNITED STATES OF AMERICA, *

Plaintiff-Intervenor, *

v. *

Civil Action No.
2:83-cv-1676-HLM

THE STATE OF ALABAMA, et al., *

Defendants. *

**ATTACHMENT A TO
KNIGHT-SIMS PLAINTIFFS' MOTION FOR LEAVE TO SERVE
FIRST DISCOVERY REQUEST FOR
HEARING TO EXTEND THE TERM OF THE REMEDIAL DECREES**

format, plaintiffs request that they be provided in both printed and computer readable forms.

1. Requests to the Governor, the Alabama Commission on Higher Education and its members, the State Finance Director and the State of Alabama Executive Budget Office: For each year from 2000-01 to the present, please provide:
 - a. The actual student unit record data used to generate student source surveys, institutional student profiles, etc., providing for each student for each year, all data, including race and other demographic data, course enrollment data and degree attainment data.
 - b. The annual “high school reports” disaggregated by race.
2. Requests to the State Board of Education, State Superintendent of Education and State of Alabama, Department of Education: For each year from 1985 to the present, please provide:
 - a. The number of high school graduates in Alabama, disaggregated by:
 - i. County;
 - ii. Race;
 - iii. Eligibility for free or reduced cost lunch status;
 - iv. Enrolling in an institution of higher education:
 - (1) in the year of graduation from high school;
 - (2) in a subsequent year;
 - (3) in a four-year institution;
 - (a) and ultimately earning a bachelor’s degree;
 - (4) in a two-year institution;

- (a) and ultimately completing the course of instruction;
 - (b) and ultimately transferring to a bachelor degree granting institution;
 - (5) in Alabama;
 - (6) outside Alabama.
- 3. Requests to each defendant institution of higher education. Please provide the following for each year from 2000 to the present:
 - a. For each student, please provide:
 - i. Race and gender;
 - ii. Class level (freshman, sophomore, etc.);
 - iii. High school from which he or she graduated (if applicable);
 - iv. Total cost of attendance;
 - v. Effective family contribution calculated by the U.S. Department of Education, Office of Federal Student Aid (ED-OFSA), from data submitted on the FAFSA);
 - vi. Total need, as calculated by ED-OFSA;
 - vii. Total grants and scholarships received from all sources;
 - viii. Total federal and state College Work Study awards;
 - ix. Total federal and state loan amounts;
 - x. Total private (non federal or state) loan amounts;
 - b. The graduation rate survey data reported annually to the U.S. Department of Education, disaggregated by race.

- c. The number of applicants for admission, disaggregated by race and by in-state or out-of-state residence;
- d. The number of applicants for financial aid, disaggregated by race and by in-state or out-of-state residence;
- e. Fall term headcount and full-time-equivalent student enrollment, disaggregated by race, by class level and by in-state or out-of-state residence;
- f. Amount of in-state and out-of-state tuition charged and amount of required fees;
- g. Amounts of need-based financial aid awarded, disaggregated by race, by class level and by in-state or out-of-state residence, from the following sources:
 - i. State of Alabama, indicating separately amounts awarded through different state program sources;
 - ii. Federal Government, indicating separately amounts awarded through Pell grants and other federal sources, including federal loans;
 - iii. Your institutional budget, indicating separately amounts awarded through different institutional program sources;
 - iv. All other public and private sources.
- h. Amounts of merit-based financial aid awarded, disaggregated by race, by class level and by in-state or out-of-state residence, from the following

sources:

- i. State of Alabama, indicating separately amounts awarded through different state program sources;
 - ii. Federal Government, indicating separately amounts awarded through federal program sources;
 - iii. Your institutional budget, indicating separately amounts awarded through different institutional program sources;
 - iv. All other public and private sources.
- i. Institutional policies for creating and negotiating financial aid packages and for allocating institutionally-administered dollars.
 - j. Matriculation rates of first-time freshmen by race and financial aid status.
 - k. Describe how the institution budgets for financial aid, and the extent to which development efforts are focused on raising funds for scholarships. (E.g., does the institution have a target of having some percentage of all gifts earmarked for need-based and merit-based financial aid?)
 - l. The number of students:
 - i. eligible for a full Pell grant,
 - ii. eligible for a partial Pell grant,
 - iii. not Pell grant eligible.
 - m. Describe how you make K-12 students aware of financial aid opportunities at your institution, and identify every secondary school and public school system to whom you provide this information.

- n. Please produce for inspection and copying all formal or informal studies and/or reports, produced either internally or externally, discussing how availability of additional financial aid would increase recruiting, enrollment and graduation opportunities at your institution.
- o. Please supplement your responses to the Knight-Sims plaintiffs discovery request regarding compliance with the April 3, 2002, order served originally on July 17, 2003. (Copy attached.) When supplementing your response to interrogatory number 6, please include in your identification of each black faculty member and administrator his or her name, year hired, department, position title, academic discipline, academic rank, tenure status, campus phone number, and campus e-mail address. You may incorporate by specific reference in your responses to this discovery request information that has been included in your annual reports to the Court.

Respectfully submitted November 30, 2005,

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CERTIFICATE OF SERVICE

I hereby certify that November 30, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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