

**BEFORE  
FACT-FINDING PANEL**

**MARTIN H. MALIN (Fact-Finder and Neutral Chair)  
ROBERT E. BLOCH (Union Panel Member)  
PAUL J. CIASTKO (Board Panel Member)**

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**In the Matter of the Fact-Finding**

**between**

**THE BOARD OF EDUCATION  
OF THE CITY OF CHICAGO**

**and**

**THE CHICAGO TEACHERS UNION,  
LOCAL 1, AMERICAN FEDERATION  
OF TEACHERS, AFL-CIO**

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**CASE NO.:**

(Fact-Finding)

**UNION'S PRE-HEARING BRIEF**

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Dated: January 20, 2025

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## INTRODUCTION

Fact-finding is different from interest arbitration in one crucial respect. Fact-finding is non-binding unless both parties choose to accept the recommendation, and it is built into the Act's impasse and strike procedures. The Fact Finder isn't deciding terms for the parties but rather is suggesting them. In short, the Fact Finder is *assisting* the parties to achieve an agreement. The credibility of the Fact Finder's report is therefore dependent on fair consideration of factors actually relevant to the parties in bargaining.

The statute was plainly drafted to produce a Fact Finder's report favorable to the District's position, which may explain in part why all Fact Finder reports to date since passage of SB 7 in 2010 have been rejected by the Union.

An example of pro-District bias, to the point of being unworkable, is shown in factor (F) to be considered by the Fact Finding panel:

F) the employer's financial ability to fund the proposals based on existing available resources, provided that such ability is not predicated on an assumption that lines of credit or reserve funds are available or that the employer may or will receive or develop new sources of revenue or increase existing sources of revenue;

As written, Factor F requires that the District actually have the cash on hand – exclusive of its reserves – to pay for a multi-year contract, which is simply impossible. The Fact Finder can't even consider the District's future budgets.

However, the Act does allow some leeway for the Fact Finder:

1. The Act states that “The fact-finding panel, acting by a majority of its members, shall base its findings and recommendations upon the following criteria **as applicable:**” (emphasis supplied). The term “as applicable” is borrowed from the IPLRA interest arbitration statute, IPLRA Sec. 14(h).

Applying the “as applicable” provision, Arbitrator James A. Murphy observed in *County of Jefferson and Illinois FOP*, ILRB No. S-MA-18-040 (2019):<sup>1</sup>

The IPLRA Section 14(h) sets forth those factors which the Arbitrator is to consider (as appropriate). Not all factors are relevant to every case; and the weight given to each will vary depending on the facts and circumstances of each case.

Arbitrator Barry Simon observed in *Mattoon Fire Fighters and City of Mattoon*, ILRB No. S-MA-22-221 (2023):<sup>2</sup>

The listing of these factors does not require the Arbitrator to apply all of them. Rather, only those factors that the Arbitrator determines to be applicable are to be applied. Furthermore, it is within the Arbitrator's discretion as to the relative importance of the factors.

Thus, the Fact Finder has discretion in determining whether and how the statutory factors should be applied.

2. In considering proposals impacting the classroom, such as staffing, the Fact Finder may consider whether the educational environment for students is improved, including by better student-teacher ratios, wraparound services, teacher preparation time, and the needs of special education students. The Act affords the Fact Finder latitude to consider whether the proposals serve “the students and families served by the employer” (Factor E) and “the overall educational environment, learning conditions, and working conditions with the school district” (Factor M). The Fact Finder is not constrained only to consider the cost of the Union’s proposals but can balance this concern against the educational mission of the District.

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<sup>1</sup> <https://ilrb.illinois.gov/content/dam/soi/en/web/ilrb/arbitration/documents/s-ma-18-040arbaward.pdf>

<sup>2</sup> [https://ilrb.illinois.gov/content/dam/soi/en/web/ilrb/arbitration/documents/S-MA-22-271\\_arb\\_award.pdf](https://ilrb.illinois.gov/content/dam/soi/en/web/ilrb/arbitration/documents/S-MA-22-271_arb_award.pdf)

3. As this Fact Finder recognized in *Board of Education and SEIU Local 73* (2019), the Fact Finder has discretion to draft their own recommended terms and is not forced to choose among the competing proposals.

The Union's package of proposals presented to the Fact Finder are affordable and, crucially, consistent with the Board's own 5-year strategic plan that was adopted on September 18, 2024.<sup>3</sup> The Board President described the 5-year strategic plan as follows:

This plan acknowledges and honors the recent gains that have been made by our students and staff. CPS' graduation rate has doubled since 2001. Students are earning more scholarship awards and postsecondary credentials than ever before. Investments in more teachers, interventionists, counselors, and social workers have guided the District's impressive recovery from the COVID-19 pandemic. These investments have translated into tremendous growth for our students and formed a strong foundation that we will build on over the next five years.

But we know this progress has not been felt equally across our city, and it has not been nearly enough to outweigh the structural and historical inequities that continue to hold students back from achieving their full potential. Opportunity and achievement gaps have persisted, especially for Black students, Latinx students, English learners, and students with disabilities.

If we want our system to make bold and transformational changes in our students' lives, then we have to make bold and transformational changes to our system. This strategic plan outlines how we can meet the challenge of this moment.

Our approach is focused on three priorities:

1. A rigorous, joyful, and equitable learning experience for every student. The daily student experience must include a high-quality, anti-racist, and culturally responsive curriculum, coupled with enrichment opportunities that challenge students academically while arming their unique identities and meeting their social and emotional needs. This daily experience will be the standard for every student, and we will focus on closing opportunity gaps that persist for those students who have historically been furthest from opportunity.
2. Resources and conditions for success in every school. Every school will offer students a safe, well-maintained learning environment that is fully staffed with exceptional teachers, administrators, and support personnel who reflect

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<sup>3</sup> See <https://www.cps.edu/globalassets/cps-pages/sites/5-year-plan/documents/strategic-plan-full-draft-v9-final.pdf>.

the diversity and lived experiences of the students they serve. Through a new funding approach based primarily on student need, we will address the inequities of the past and ensure a high-quality experience in every school, no matter its type, size, or location.

3. Inclusive and collaborative partnerships in every community. We must acknowledge the decades of structural racism and community disinvestment that have eroded trust between CPS and many of our school communities. We will strengthen preschool to high school pathways in every community and leverage our District's many partnerships to transform neighborhood schools in under-resourced areas into anchors for their communities. Sustainable Community Schools will expand, with wraparound academic, health, and social support for our students, fostering strong collaborative partnerships and robust supports for the whole child. <sup>4</sup>

Though the Board's attorneys will likely run away from this strategic plan in an effort to induce a more conservative recommendation, the fact is that the Union's proposal *actually fulfills the Board's own plan* during the term of the upcoming labor contract. The Fact Finder is urged to strongly consider how the Union's proposals and the Board's own strategic plan align.

### Governing Law

This proceeding is governed by Section 12(a-10) of the Illinois Educational Labor Relations Act, 115 ILCS 5/1, et seq. ("IELRA"). The IELRA provides, at Section 12(a-10)(4), the criteria upon which the fact-finding panel is to base its recommendations, as applicable:

- (A) the lawful authority of the employer;
- (B) the federal and State statutes or local ordinances and resolutions applicable to the employer;
- (C) prior collective bargaining agreements and the bargaining history between the parties;
- (D) stipulations of the parties;
- (E) the interests and welfare of the public and the students and families served by the employer;

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<sup>4</sup> Id., at pg. 3.

- (F) the employer's financial ability to fund the proposals based on existing available resources, provided that such ability is not predicated on an assumption that lines of credit or reserve funds are available or that the employer may or will receive or develop new sources of revenue or increase existing sources of revenue;
- (G) the impact of any economic adjustments on the employer's ability to pursue its educational mission;
- (H) the present and future general economic conditions in the locality and State;
- (I) a comparison of the wages, hours, and conditions of employment of the employees involved in the dispute with the wages, hours, and conditions of employment of employees performing similar services in public education in the 10 largest U.S. cities;
- (J) the average consumer prices in urban areas for goods and services, which is commonly known as the cost of living;
- (K) the overall compensation presently received by the employees involved in the dispute, including direct wage compensation; vacations, holidays, and other excused time; insurance and pensions; medical and hospitalization benefits; the continuity and stability of employment and all other benefits received; and how each party's proposed compensation structure supports the educational goals of the district;
- (L) changes in any of the circumstances listed in items (A) through (K) of this paragraph (4) during the fact-finding proceedings;
- (M) the effect that any term the parties are at impasse on has or may have on the overall educational environment, learning conditions, and working conditions with the school district; and
- (N) the effect that any term the parties are at impasse on has or may have in promoting the public policy of this State.

### Disputed Issues

These criteria will be referenced throughout this brief as applicable. Pursuant to Section 12(a-10)(4)(D), on January 9, 2025 the parties submitted the following lists of issues to fact-finding.

### CTU:

1. Term of Agreement
2. Salaries (COLA and Step Increases)
3. Staffing
4. Teacher Preparation Time, Professional Development, and the Elementary School Day
5. PSRP Issues
6. Sports
6. Early Childhood Education
8. Clinicians and Counselors



9. Guest Teachers/Class Coverage
10. Teacher Evaluation
11. Assessments
12. Class Size
13. School Closings and Charter Schools

CPS:

1. Term of Agreement (Proposal to modify termination date from July 1 to May)
2. Salaries (COLA and step increases; Article 36, Appendices A and F)
3. Staffing
4. Outstanding financial items including coaching stipends/ELPT stipends/fine arts budget/workload funds/supply money etc.
5. Teacher preparation time and professional development (Articles 4, 5, 6, 19, 25 and Elementary School Day)
6. Clinicians (Article 20)
7. Teacher Evaluation (Article 39)
8. Mid-year transfers (Article 35-4)
9. Class size limits, automatic support, class size relief funding (Article 28)
10. School closings and Charter expansion moratoriums (Side Letters)
11. Grievance and arbitration process changes (Article 3)
12. Assessments (Article 44-32)

## **CTU PROPOSALS**

The Union's proposals focus on four areas: fair pay and benefits for teachers, clinicians and paraprofessionals; fully staffed schools; smaller class sizes; and justice and equity for students, families, and employees.

### **1. Salaries**

#### a. Restoration of the District's Financial Health

It is likely in this proceeding that the parties' differences primarily concern the District's ability to pay for the labor contract. It is accordingly appropriate to start with a review of the District's current finances and its historical tendency to understate available resources.

Though Covid-era federal funding has now expired, CPS utilized these funds in part to restore and significantly increase its fund balance. This development is significant because of the substantial borrowing, generally in the form of TANS (Tax Anticipation Notes), that CPS routinely utilizes for its operating expenses.

The District, further, is the recipient of substantial funds from overfunded or expiring TIF (Tax increment Financing) Districts. It also may expect increases in local and state funding. These available funds are expected to increase significantly in the coming years, as further explained below.

b. The District's Fund Balance

The District's Operating Fund Balance, also known as its "financial reserve,"<sup>5</sup> is currently higher than at any point in the last two decades<sup>6</sup> in both dollar and percentage amounts.

The District's Fund Balance has improved dramatically since 2016, when it was actually negative – a result of six consecutive years of the District ending the year with an operating surplus, most recently \$199 million in FY23.<sup>7</sup>

As a measure of the District's financial stability, its Fund Balance is better today than at any time of the last five contract negotiation cycles, as shown in the following chart:<sup>8</sup>

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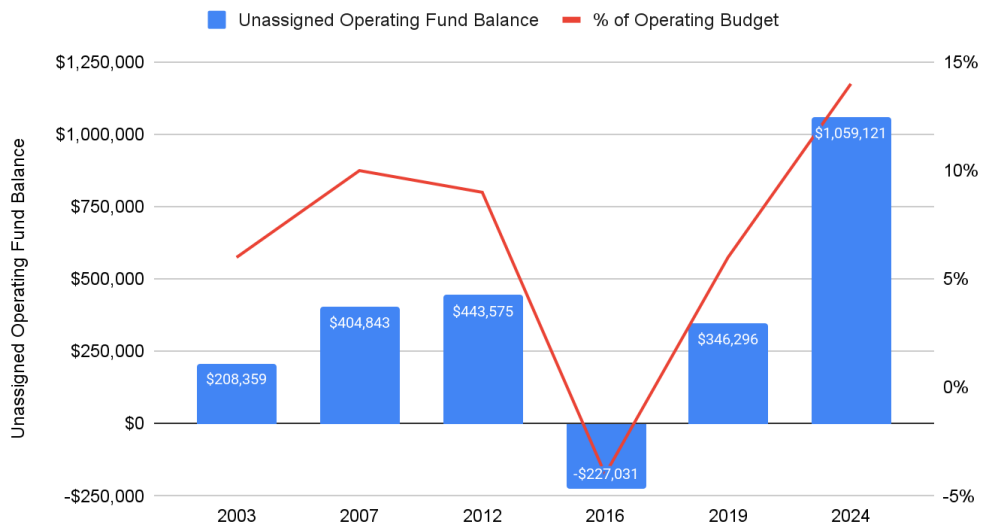
<sup>5</sup> FY25 budget book, page 259: <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf>

<sup>6</sup> See CPS [Comprehensive Annual Financial Reports](https://www.cps.edu/about/finance/annual-financial-report/), <https://www.cps.edu/about/finance/annual-financial-report/>

<sup>7</sup> FY23 CPS CAFR, pg 40: [https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr\\_2024-03-07.pdf](https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr_2024-03-07.pdf)

<sup>8</sup> Based on annual [CAFRs](#) and CPS budgets, [https://drive.google.com/file/d/1ENRNMeHAUf0\\_pLg2PLaybDgUrnZbOUG/view](https://drive.google.com/file/d/1ENRNMeHAUf0_pLg2PLaybDgUrnZbOUG/view)

## Unassigned Operating Fund Balance Across Contract Bargaining Cycles



Standard & Poor’s acknowledges that the District’s current credit rating of BB+/Stable relies on the CPS Fund Balance health. Its most recent credit report states: “We believe CPS’ current reserve level (\$1.18 billion or 14.9% of revenues) continues to support the rating.”<sup>9</sup>

### c. The District’s Borrowing Capacity

CPS now has far more capacity to utilize its access to long-term borrowing to create budget relief – a regular part of how CPS manages its budget when dealing with fiscal challenges.

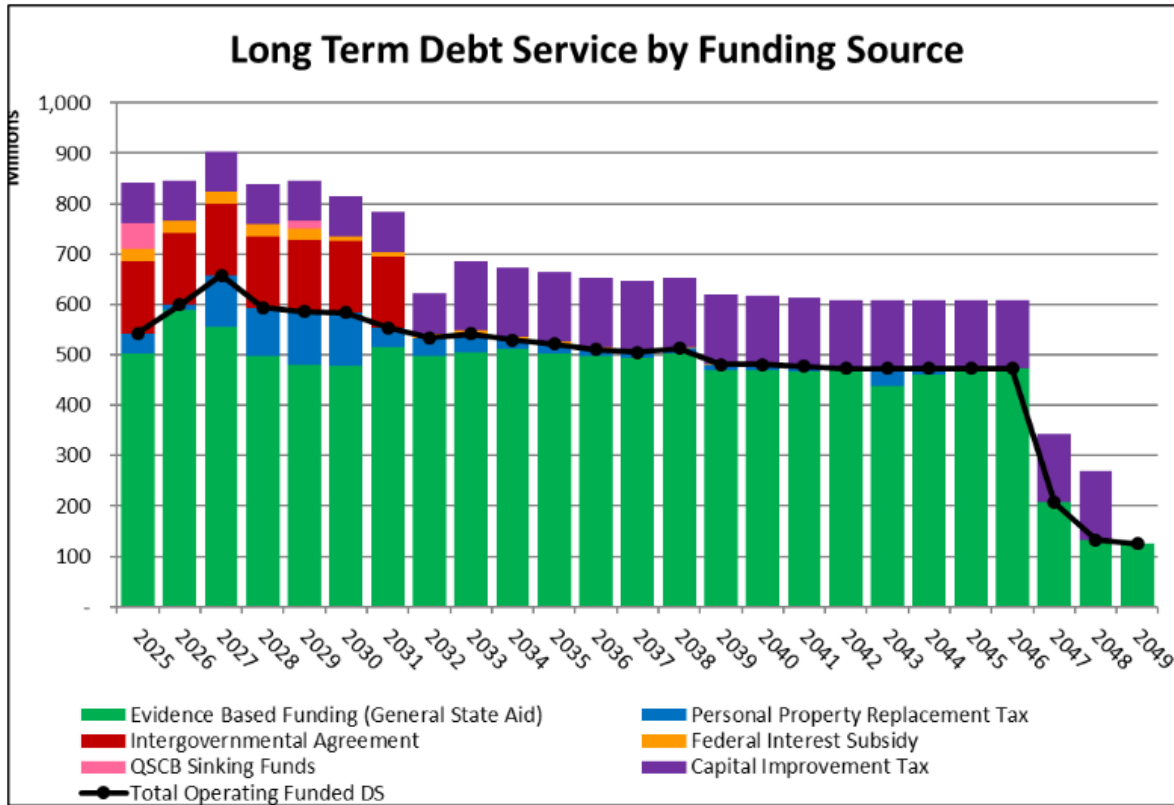
On August 13, 2024, CPS circulated a slideshow presentation showing that it has \$9.3 billion in debt, with debt service payments of \$817 million.<sup>10</sup> Significantly, CPS recognizes that

<sup>9</sup> <https://emma.msrb.org/P21874184.pdf> at p. 2

<sup>10</sup> See [https://drive.google.com/file/d/1UFPIpNBbHTQh\\_D2hPFZCLEYJbjK0vRVI/view?usp=sharing](https://drive.google.com/file/d/1UFPIpNBbHTQh_D2hPFZCLEYJbjK0vRVI/view?usp=sharing)

its debt service is set to decline after 2031 by \$100 - \$200 million annually, and dropping further in later years.<sup>11</sup>

**Chart 1: CPS Debt Service Funding Schedule  
(as of June 1, 2024)**



In addition to the substantially reduced debt service in the near-term future, CPS will also see one of its key revenue sources for facility needs increase by \$142.5 million in 2031 - above and beyond annual increases uncapped by the Property Tax Extension Limitation Law (PTELL).<sup>12</sup>

<sup>11</sup> See <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf>

<sup>12</sup> See [https://www.cpsboe.org/content/documents/analysis\\_of\\_cps\\_finances\\_and\\_entanglements-final-103122.pdf](https://www.cpsboe.org/content/documents/analysis_of_cps_finances_and_entanglements-final-103122.pdf)

This statutory increase is projected to improve their 2031 receipts to \$256.5 million, <sup>13</sup> up from \$85.2 million in FY25. <sup>14</sup> Thus, CPS has ample capacity for long term borrowing.

Further, CPS is nowhere close to hitting its legal Debt Limits under Illinois law. CPS has a \$13.6 billion debt limit,<sup>15</sup> but has no outstanding debt that counts towards that limit because of its use of Alternative Revenue Bonds.<sup>16</sup>

CPS has historically used its access to the markets to manage and restructure its debts and gaps in its operating budget to ensure schools are stabilized. The FY25 budget counts on \$52 million “savings from restructuring” debt, which represents 6% of their annual debt service.<sup>17</sup> Yet this is far less debt restructuring than CPS has done in the past. In the FY18 budget the Treasury Department restructured debt to create \$145 million in budgetary relief, and in FY 2019 \$210 million in budgetary relief, which represented 24% and 34% of their debt service budgets, respectively.<sup>18</sup> To get through the fiscal crisis in 2016, CPS restructured \$255 million in debt, or 47% of its debt service expenses. And in 2012, when passing its budget amendment in relation to the 2012 CTU contract, the district used its financial tools to restructure debt and draw down on its unrestricted fund balance to close a budget deficit.

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<sup>13</sup> <https://emma.msrb.org/P21673386-P21287694-P21717199.pdf#page=21>

<sup>14</sup> [FY25 Budget](https://www.cps.edu/about/finance/budget/budget-2025/revenue-2025), Revenue section, at <https://www.cps.edu/about/finance/budget/budget-2025/revenue-2025>

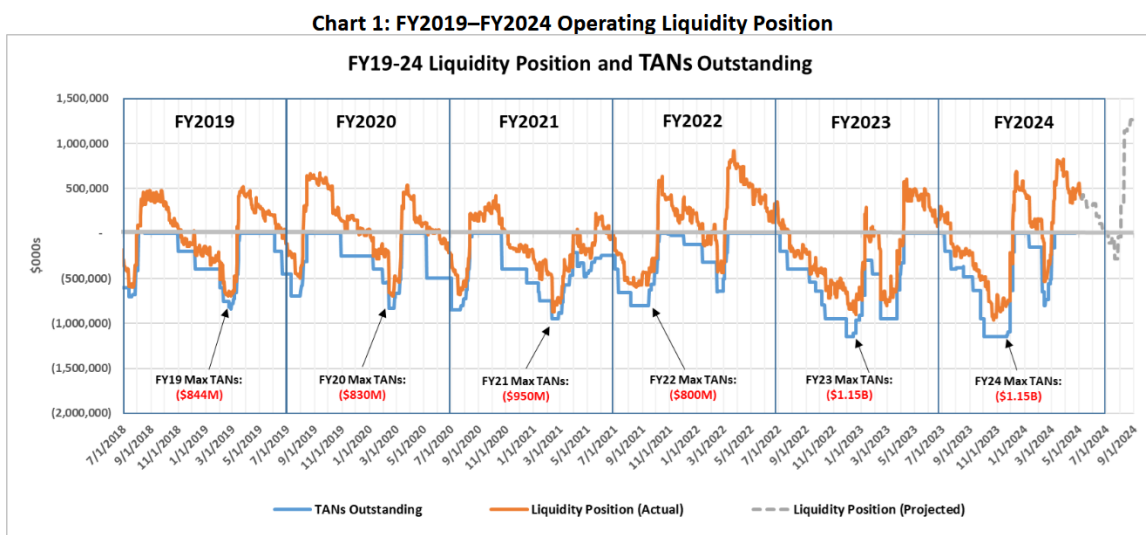
<sup>15</sup> FY23 CAFR, pg 78  
[https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr\\_2024-03-07.pdf](https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr_2024-03-07.pdf)

<sup>16</sup> [2023 BOE Bond offering](https://emma.msrb.org/P21741677-P21337634-P21771993.pdf), pg 49: <https://emma.msrb.org/P21741677-P21337634-P21771993.pdf>

<sup>17</sup> [FY2025 CPS Budget](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf), pg 9: <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf>

<sup>18</sup> As described on pg 92 of the [FY19 budget](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2019/docs/fy19_budgetbook_approved.pdf), [https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2019/docs/fy19\\_budgetbook\\_approved.pdf](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2019/docs/fy19_budgetbook_approved.pdf)

In addition to long-term borrowing capacity, the district also routinely borrows for cash flow purposes, maintaining a short-term credit line through issuance of Tax Anticipation Notes (TANs). Since 2017 the district has utilized TANs to manage its cash flow. CPS has routinely borrowed over \$1 billion through TANs, and as recently as 2021, had hundreds of millions owed on its short-term credit line at the end of the fiscal year on June 30th.<sup>19</sup> In recent years, the months-long delays in property tax collections caused by delayed Cook County property tax bills meant that the district borrowed for a longer period.<sup>20</sup> However, as shown in the CPS cash flow chart in their FY25 budget, they anticipated starting the school year at near positive cash flow - a vast improvement over the last two fiscal years.<sup>21</sup>



In summary, the district has experienced a vastly improved fund balance since 2019, has capacity for both long-term borrowing and access to short-term borrowing with an improved

<sup>19</sup> See <https://drive.google.com/file/d/1Hjhi2dbrF408nsnI7b7DWnr3mVb7kJP6/view?usp=sharing>

<sup>20</sup> As described on pg201 and 209 of the [FY24 budget](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2024/docs/fy2024-budget-book-final-approved-1.1.pdf), <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2024/docs/fy2024-budget-book-final-approved-1.1.pdf>

<sup>21</sup> [FY2025 CPS Budget](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf), pg 258, <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf>

cash flow picture, and it has a historical track-record of using reserves and fund balance to balance its budget and pay for contracts.

d. The District's Revenue Growth since 2019 and Continuing

Tax Increment Financing Surpluses and Expirations TIF Surplus

Tax Increment Financing (TIF) districts divert property tax revenue from other taxing bodies for the purposes of economic development. Upon creation, the value of property within the TIF district that can be accessed by other taxing bodies is frozen, and any additional property tax growth in future years is retained in the TIF fund. For Chicago Public Schools, this represents a significant diversion, since 54.7% of property taxes paid within Chicago go to the District.<sup>22</sup> TIFs are typically in place for 23 years, and can be extended for another 13 years. With the tremendous property value growth in TIFs across the city, particularly in downtown and adjacent areas, TIFs now generate \$1.36 billion in Chicago.<sup>23</sup>

TIF Surplus and Contract Bargaining

Over the last decade, the City of Chicago has designated an amount of funds in the City's TIF accounts as surplus, to be released to taxing bodies, 54.7% of which goes to the District. In 2012, this annual surplus was just \$25 million, of which roughly half went to CPS.<sup>24</sup> In 2016, CPS anticipated \$32 million in TIF surplus, which was followed by another \$55 million TIF

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<sup>22</sup> [Cook County 2023 TIF Report](https://www.cookcountyclerk.il.gov/sites/default/files/pdfs/2023%20TIF%20Report.pdf), <https://www.cookcountyclerk.il.gov/sites/default/files/pdfs/2023%20TIF%20Report.pdf>

<sup>23</sup> Id.

<sup>24</sup> [Civic Fed report](https://www.civicfed.org/civic-federation/blog/cps-releases-amended-fy2013-budget), <https://www.civicfed.org/civic-federation/blog/cps-releases-amended-fy2013-budget>

surplus in the days leading up to the contract settlement.<sup>25</sup> A total of \$175 million in surplus was ultimately released from the City’s TIF funds that year. In 2019, in the final week of the 15-day strike, the City declared a record \$300 million TIF surplus of which \$163 million would go to CPS schools. The schools were already expecting a \$96 million surplus, and the additional funding helped close the deal.<sup>26</sup>

The District consistently underestimates the annual TIF surplus it receives, especially as the amount of funding in TIFs has soared. Again this year, a contract bargaining year, in the summer of 2024 the District passed a budget expecting \$160 million in surplus TIF funds. But the budget passed by the City in December 2024 includes a \$298 million in surplus TIF funds that were allocated to CPS. Yet for future years, the District assumes only \$97 million in TIF surplus, according to bargaining discussions. The chart below shows the difference between the District’s budgeting of TIF surpluses and the actual TIF surpluses it has received. <sup>27</sup>

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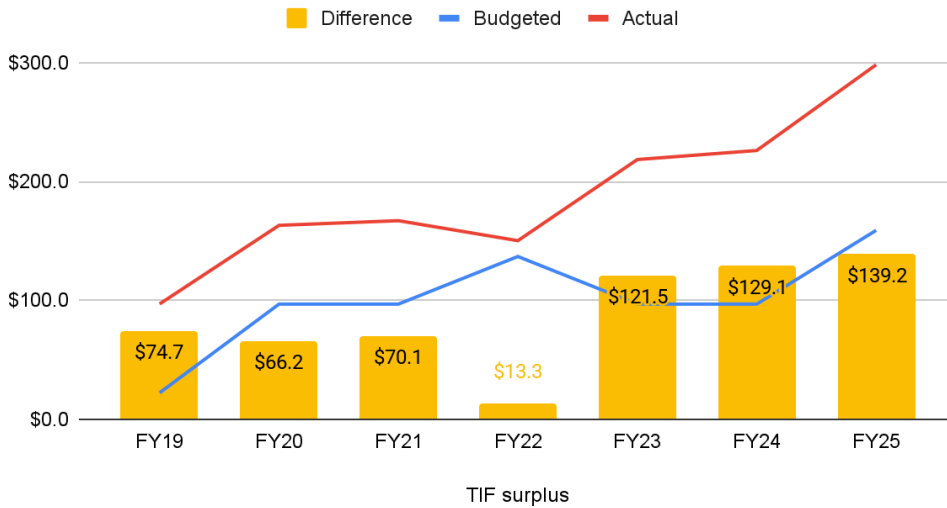
<sup>25</sup> <https://news.wttw.com/2016/10/11/ctu-cps-agree-contract-full-cost-remains-unclear>

<sup>26</sup> <https://chicago.suntimes.com/city-hall/2019/10/23/20928569/tax-increment-financing-tif-surplus-city-budget-teachers-strike>

<sup>27</sup> Based on historical [CPS budgets](#), for [data see here](#)



### TIF Surplus: Budgeted, Actual and Difference (millions)



Given the history of actual TIF surpluses vs. CPS projections, and the current annual TIF revenue of \$1.36 billion and the \$3 billion fund balance across TIF districts, the City can be expected to continue to maintain the level of TIF surplus.<sup>28</sup>

#### TIF Expirations

In addition to TIF surpluses, the District is also expected to receive tax revenue through the expiration of TIFs, which are estimated to generate a total of \$986 million for CPS through 2031, with annual increases over that time period from \$50 million to more than \$100 million. As TIF expirations are added to the property tax levy outside of the tax cap, they compound over the years and lead to considerable revenue growth.

The Chicago Tribune on January 6, 2025, reviewed data from the City of Chicago Department of Planning and Development with respect to expiring TIF districts through 2039. As the Tribune explained:

<sup>28</sup> <https://igchicago.org/information-portal/data-dashboards/chicago-tif-districts-map-fund-balances/>

According to city planning and development office estimates, new CPS revenues from expiring TIFs would grow from \$54 million in 2025 — equal to about 10% of the district’s projected deficit next year — to over \$100 million between 2026 and 2030, if the district moves to capture all the new values from expiring TIFs. <sup>29</sup>

The actual data utilized [by the Tribune](#)<sup>30</sup> shows that CPS will receive the following additional funds *solely* from expiring TIFS, and without regard to available TIF surpluses from active TIFs:

X.1	Chicago Public Schools
2025	\$53,994,709
2026	\$117,586,323
2027	\$121,252,874
2028	\$136,436,703
2029	\$145,141,919
2030	\$145,524,685
2038	\$646,319,214

*Transit TIF revenue*

In addition to TIF expirations and TIF surplus, another new TIF-related source of revenue will provide CPS with increasing revenue at levels they did not have access to in the last contract cycle. CPS also receives money from TIFs through the Transit TIFs, which are unique TIFs in that CPS directly receives the proportionate taxes raised in those TIFs. The Red-Purple Modernization TIF, created in 2016, now generates over \$120 million for CPS. The creation of

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<sup>29</sup> <https://www.chicagotribune.com/2025/01/06/chicago-tif-cliff-expiring-taxing-districts/>

<sup>30</sup> See <https://docs.google.com/spreadsheets/d/1Q1hSK3NqIfme9a119TB7TceuCTVdUIKs/edit?usp=sharing&ouid=110361321672959751177&rtpof=true&sd=true>

the new Red Line Extension TIF will add tens of millions in additional revenue for CPS. Based [on Cook County Clerk estimates](#),<sup>31</sup> the total amount generated by those two Transit TIFs will increase from \$214 million *annually* in 2023 to over \$400 million by 2031. CPS' portion would increase at least proportionately, from \$115 *annually* to over \$216 million. The newly added RLE TIF, which CPS did not have access to in 2019, represents a new source of increasing property taxes that provide CPS with stable future revenue growth.

In summary, the District can expect substantial funding from TIF surpluses, expiring TIFs, and the new Transit TIFs. From FY25 through FY28, these sources will bring in a combined total of **\$2.2 billion** in revenues for CPS.<sup>32</sup>

e. Increases in Local Funding

Property values are on the rise in Chicago, particularly after the inflation in housing prices and the impact of the citywide reassessment in 2024 will have further upward pressure on the amount of tax base available to CPS. From 2019 to 2023, there was only one scheduled reassessment, in 2021. However, due to the impact of Covid-19 on the economy, the Cook County Assessor had also made downward adjustments to property values which suppressed growth in Equalized Assessed Value (EAV). These actions deflated values, so that the EAV growth in 2021 - the reassessment year - was just 8.27% in 2021 and a negative 0.02% in 2022.<sup>33</sup> Over the currently negotiated contract duration, there are two

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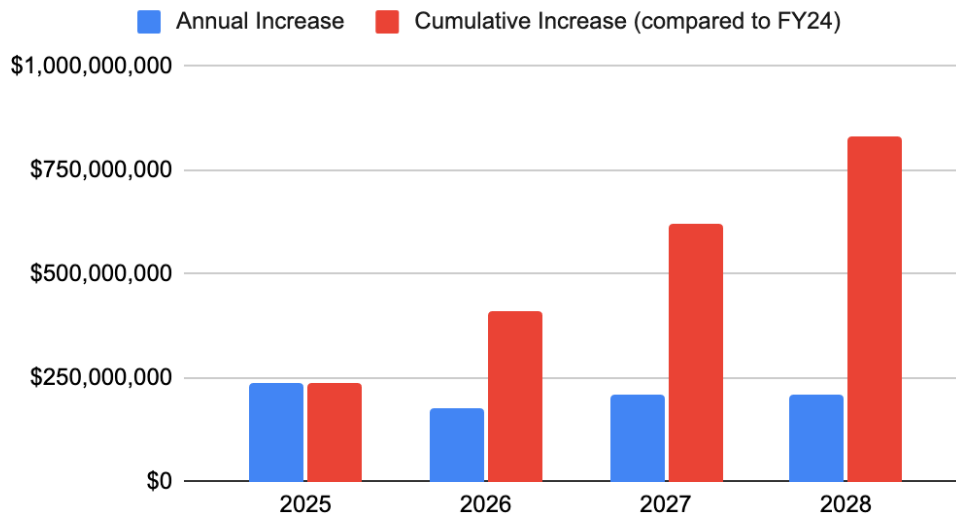
<sup>31</sup> <https://www.cookcountyclerkil.gov/sites/default/files/pdfs/2023%20TIF%20Report.pdf>

<sup>32</sup> See here [https://drive.google.com/file/d/10vvi194fngjVnDk3SD892WLBmYJv1v7s/view?usp=drive\\_link](https://drive.google.com/file/d/10vvi194fngjVnDk3SD892WLBmYJv1v7s/view?usp=drive_link)

<sup>33</sup> For data and methodology see [https://drive.google.com/file/d/11vvjEwTq3ea4XkOx1\\_8n8XVIQDcqP9hM/view?usp=drive\\_link](https://drive.google.com/file/d/11vvjEwTq3ea4XkOx1_8n8XVIQDcqP9hM/view?usp=drive_link)

reassessments scheduled that will impact CPS revenue, 2024 and 2027. Based on even moderate historical assumptions around annual growth in property tax value, and depicted on the chart below, this will lead to hundreds of millions more property taxes available in the future of which the District receives its mandated share.<sup>34</sup>

### CPS Property Tax Increases



#### f. State and Federal Funding

The State’s education funding is in a very different place than in past negotiations. When the 2012 contract was negotiated, the State had kept its foundation funding level - the formula for providing per-pupil funding to districts - flat since 2010 and state aid payments were also frequently delayed.<sup>35</sup> In 2016, CPS faced a hostile governor who was intent on

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<sup>34</sup> Id.

<sup>35</sup> <https://www.civicfed.org/iifs/blog/state-funding-chicago-public-schools>

stripping funding for CPS,<sup>36</sup> and the state's budget impasse even imperiled the start of school.<sup>37</sup>

In 2019, the parties were negotiating two years into a historic rewrite of the education funding formula that finally provided a pathway for equitable funding in the future through evidence-based funding (EBF). The legislation enabling the funding formula establishes 2027 as a target for achieving full funding.<sup>38</sup> The formula calculates that CPS will receive another \$1.2 billion in additional resources under full funding.<sup>39</sup> In 2024, there is a chorus of school districts across Illinois that have been pressuring the Illinois legislature to increase school funding<sup>40</sup> to meet its commitment to full funding by 2027. Even the Illinois State Board of Education is calling on the State to continue its recent pattern of adding a \$350 million annual increase to the evidence-based funding structure.<sup>41</sup>

The federal pandemic relief that was provided to school districts, ESSER (Elementary and Secondary School Emergency Relief) funding, provided school districts across the country and Illinois with billions in resources. In Illinois, the \$7.8 billion in relief funds helped fill the gaps in the under-funded state funding formula, not just for CPS but for hundreds of other districts that used that funding to support staffing levels, lower class sizes

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<sup>36</sup> <https://www.chicagotribune.com/2017/08/02/rauner-takes-aim-at-cps-funding-in-rewriting-education-plan/>

<sup>37</sup> <https://www.civicfed.org/iifs/blog/break-illinois-budget-impasse-allows-partial-spending-plan>

<sup>38</sup> <https://www.ilga.gov/legislation/ilcs/fulltext.asp?DocName=010500050K18-8.15>

<sup>39</sup> <https://www.isbe.net/ebfdist>

<sup>40</sup> <https://www.chalkbeat.org/chicago/2024/10/11/illinois-starts-budget-season-with-input-from-parents-and-teachers/>

<sup>41</sup> <https://www.chicagotribune.com/2025/01/16/illinois-education-board-funding-request>

and social-emotional resources.<sup>42</sup> With more funding provided to high-poverty districts,<sup>43</sup> the ending of ESSER funds creates a fiscal hole for districts like CPS and other high-poverty school districts.<sup>44</sup> CPS is not alone in its urgency in needing a structural funding fix at the state level, and as evidenced by the number of districts advocating for more funding in this year's state budget,<sup>45</sup> there will be continued and increased pressure for the Illinois legislature to meet its statutory commitment by 2027. Unlike in the past, the State has in place a formula that directs resources to districts like CPS based on student need, a funding target based on student need, and a legislated deadline by statute.

g. The CTU Salary and Compensation Proposals

1. Teacher/PSRP COLAs

Year 1: 5%

Year 2: 5%

Year 3: 4-5%\* [agreed]

Year 4: 4-5%\* [agreed]

\*Minimum 4%, up to 5% depending on rate of inflation

2. Teacher Steps

- Eliminate multi-year alphabet steps up to year 25
- Adding a \$1,200 step at each of the 7 years that currently do not have an associated step increase between years 14 and 25

3. PSRP Compensation

- Addition of 4 steps to eliminate the 4 and 5 year steps currently on the schedule

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<sup>42</sup> <https://www.chicagotribune.com/2023/12/27/with-pandemic-aid-expiring-and-most-funds-already-spent-schools-across-illinois-face-a-financial-cliff/>

<sup>43</sup> <https://www.brookings.edu/articles/the-esser-fiscal-cliff-will-have-serious-implications-for-student-equity/>

<sup>44</sup> <https://www.governing.com/finance/illinois-schools-face-financial-cliff-as-pandemic-aid-ends>

<sup>45</sup> <https://capitolnewsillinois.com/news/budget-pressures-could-impact-k-12-funding/>

- Our proposal reduces the value of steps in the middle years so as to mitigate cost impact, while also ensuring that mid-career and veteran paraprofessionals access step increases without having to wait multiple years.
- Lane IV created for PSRPs whose position prefers a Masters Degrees.

h. Cost estimates of CTU Compensation and Staffing Proposals

1. *COLA for all bargaining unit employees:*

The following chart shows the total and differential costs comparing the District and CTU proposals:

<b>COLA cost out comparison</b>						
<ul style="list-style-type: none"> <li>• Compared to FY25 baseline, costs in millions</li> <li>• \$30 million per 1% as per CPS calculations</li> <li>• Assumption of 4.5% in 2027 and 2028</li> </ul>						
<b>Fiscal Year</b>	<b>CTU proposal</b>	<b>CTU cost</b>	<b>CPS proposal</b>	<b>CPS cost</b>	<b>Annual difference</b>	<b>Difference<sup>46</sup> as % of operating budget<sup>47</sup></b>
<b>2025</b>	5%	\$150	4%	\$120	\$30	0.36%
<b>2026</b>	5%	\$308	4%	\$245	\$63	0.71%
<b>2027</b>	4 to 5%	\$456	4 to 5%	\$391	\$66	0.71%
<b>2028</b>	4 to 5%	\$612	4 to 5%	\$543	\$68	0.71%
<b>Total</b>		\$1,526		\$1,299	\$227	

<sup>46</sup> Percentage increase differential only applies in years 1 and 2 because the parties are in agreement on COLA for years 3 and 4.

<sup>47</sup> Based on \$8.433 billion [budget in FY25](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf), with 4.65% growth in FY25-FY28, based on last decade's historical operating budget growth rate: <https://www.cps.edu/globalassets/cps-pages/about-cps/finance/budget/budget-2025/docs/fy2025-budget-book-final-approved-1.1.pdf>

2. *Teacher Steps:*

CPS provided its cost out for the Union’s step salary adjustment for teachers on December 6, 2024, shown in the chart below.<sup>48</sup>

<b>CTU Step Proposals (in millions)</b>				
<b>Fiscal Year</b>	<b>Teacher Steps</b>	<b>PSRP Steps</b>	<b>Total</b>	<b>Difference as % of operating budget</b>
2025	\$6	\$12	\$18	0.22%
2026	\$6	\$13	\$19	0.21%
2027	\$13	\$13	\$26	0.29%
2028	\$20	\$14	\$34	0.35%
Total	\$45	\$52	\$97	

3. *PSRP Step Proposal:*

CTU’s estimate of its PRSP step proposal is roughly \$12 million annually (0.14% of the annual operating budget) or \$52 million for the 4-year contract duration. As shown in the summary chart below of the status quo and proposed step structures, under the current step structure, PSRPs must wait 5 years after hitting their 7th year of service to get another step raise, and again another 5 years after hitting their 12th year of service. The CTU’s proposal adds modest increments to ensure consistent raises throughout the entirety of a paraprofessional’s career in the district.

<b>Year of service</b>	<b>Current Step</b>	<b>Current Step % Inc</b>	<b>Proposed Step</b>	<b>Proposed % Step Inc</b>
1	1		1	-
2	2	5.10%	2	5.10%
3	3	5.10%	3	5.10%
4	4	5.10%	4	5.10%

<sup>48</sup> See [https://drive.google.com/file/d/1Aonwvpjg0dZoEScWbhArLGwB7q\\_jy7PI/view?usp=sharing](https://drive.google.com/file/d/1Aonwvpjg0dZoEScWbhArLGwB7q_jy7PI/view?usp=sharing)



5	4		4	
6	4		5	5.10%
7	5	5.10%	5	
8	5		6	3.50%
9	5		6	
10	5		7	3.50%
11	5		7	
12	6	5.10%	8	3.50%
13	6		8	
14	6		9	3.50%
15	6		9	
16	6		10	3.50%
17	7	5.10%	10	
18	7		11	3.50%
19	8	5.10%	11	
20	8		12	3.50%
21	9	3.00%	12	
22	9		13	5.10%
23	9		13	
24	9		13	
25	10	3.00%	14	5.10%

4. *Total Cost of CTU Salary and Compensation Proposals*

Together, the differences in the core components of the CTU and the District’s compensation proposals across COLA, teacher steps and PSRP steps costs just 0.57% of the annual operating budget in the first year, and rising to 1.06% in the final year.

<b>Total CTU Core Compensation Costs above CPS Proposal</b>		
<b>Fiscal Year</b>	<b>Cost Difference</b>	<b>% of operating budget</b>
2025	\$48	0.57%
2026	\$82	0.92%
2027	\$92	1.00%
2028	\$102	1.06%

The differences of 0.6% to 1% of the budget actually fall within the general annual margin of the District’s \$9 billion ordinary budget fluctuations. For example in 2023, CPS budgeted \$7.994 billion in operating expenditures but only spent \$7.714, for a savings of \$280 million or 3.5% of spending.<sup>49</sup> In 2019, CPS budgeted \$5.984 billion and spent \$5.859, a savings of \$125 million, or 2.1% of spending.<sup>50</sup>

##### 5. *Cost Estimates of CTU Staffing Proposals*

The Union has advanced a package of targeted staffing proposals designed to address some of the school district’s most pressing needs, detailed in Section 2, *infra*. As described further in Section 2, CTU and CPS were able to make significant strides on staffing levels in the 2019 CBA. And, at CTU’s urging, CPS in 2024 did away with its former staffing model (known as “Student-based Budgeting”) that effectively punished many high-needs schools by providing them fewer baseline positions, and replaced it with an equity-based staffing model.<sup>51</sup> These staffing investments have all redounded to the benefit of CPS students and families, as CPS students had some of the largest post-pandemic academic gains of any school district in the country.<sup>52</sup>

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<sup>49</sup> See [https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr\\_2024-03-07.pdf](https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy2023-cps-acfr_2024-03-07.pdf) pg 41

<sup>50</sup> [https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy19\\_cafr.pdf](https://www.cps.edu/globalassets/cps-global-media/banner-images/annual-financial-report/fy19_cafr.pdf) pg 40

<sup>51</sup> See <https://www.chalkbeat.org/chicago/2024/03/21/chicago-public-schools-ending-student-based-budgeting/#:~:text=Chicago%20Public%20Schools%20plans%20to,additional%20funding%20based%20on%20need>

<sup>52</sup> See <https://news.wttw.com/2024/02/19/cps-shows-strong-academic-recovery-after-covid-19-pandemic-study-finds.>

In view of this, and in order to preserve these gains, CTU has proposed that CPS agrees to maintain its equity staffing model in place for the 2024-25 school year for the duration of the successor CBA, except as improved upon by the CBA. The Union views this proposal as critical, as without such a commitment, the district may attempt to finance other initiatives and commitments by reducing staffing ratios secured in the last CBA.

The Union is also proposing a series of phased-in staffing additions in key areas across the term of the contract. These phase-ins would begin to take effect in fiscal year 2026, and thus *have no budget impact for the current fiscal year*. The Union estimates its staffing proposals would cost \$37.18M in FY26, \$70.58M in FY27, \$97.78 in FY28, for a cumulative total of \$205.55M above current staffing costs.

Staffing Demand Cost-out (in millions, and relative to baseline FY25 spending)	FY25	FY26	FY27	FY28	Cumulative Total
Additional 800 TAs by 2028	\$0.00	\$18.60	\$37.20	\$49.60	\$105.40
Librarians	\$0.00	\$3.00	\$6.00	\$9.00	\$18.00
Social workers every school every day	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00*
1 Nurses every school	\$0.00	\$1.00	\$1.50	\$2.00	\$4.50
Network Fine Arts Teachers	\$0.00	\$1.30	\$2.60	\$3.90	\$7.80
300 counselors by 2028	\$0.00	\$10.00	\$20.00	\$30.00	\$60.00
ELPT stipend for ratio above 200:1	\$0.00	\$0.38	\$0.38	\$0.38	\$1.15
Case Managers	\$0.00	\$2.90	\$2.90	\$2.90	\$8.70
Total	\$0.00	\$37.18	\$70.58	\$97.78	\$205.55
Total Cost as % of Budget <sup>53</sup>	0%	0.4%	0.8%	1%	

<sup>53</sup> Based on \$8.433 billion [budget in FY25](#), with 4.65% growth in FY25-FY28, based on last decade's historical operating budget growth rate.

\*As of September 2024, with 632 social workers scheduled across district schools, an additional 45 positions would have been sufficient to ensure a social worker assigned to a school every day. The district has budgeted for 684 total social workers.

These proposals are eminently achievable, aligned with the adequacy targets under Illinois' evidence-based funding (EBF) model for state funding to school districts,<sup>54</sup>, aligned with CPS's 5-year Strategic Plan, and, as detailed in Section 2, aligned with moving the school district into compliance with nationally recommended staffing ratios.

i. CTU's Compensation and Staffing Proposals are Fair and Appropriate

When compared to other large unionized school districts, giving due consideration to retaining experienced teachers who may opt to transfer to suburban school districts, and considering the cost of living, the CTU's compensation proposals are fair and appropriate.

1. *The District can Afford the Union's Proposals*

Sec. 12(a-10)(4)(F) identifies one of the factors "as applicable":

(F) the employer's financial ability to fund the proposals based on existing available resources, provided that such ability is not predicated on an assumption that lines of credit or reserve funds are available or that the employer may or will receive or develop new sources of revenue or increase existing sources of revenue;

As discussed above, if factor F were applied wholly as written on its face, the Fact Finder could solely consider whether the District has the cash on hand to pay for a 4-year contract. But if the financing criterion is applied "as applicable" the District can afford the Union's proposals.

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<sup>54</sup> See Center for Tax and Budget Accountability, Analysis of SB1947 (Public Act 100-0465): The Evidence-Based Funding for Student Success Act (Oct.10,2017), available at <https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act>.

As discussed above, the District enjoys an historically high Fund Balance, which enables it to increase borrowing beyond the typical annual \$1 billion in TANS and other borrowing it routinely accesses. Its existing debt service is sustainable, well below the legal debt limit, and will soon be dropping by the end of the contract term.

The District also enjoys historically high TIF surplus revenue, while consistently understating its actual TIF surpluses received. It will receive an estimated \$429 million in tax receipts during the period 2025-28 solely from expiring TIFs.

As shown in prior sections, CPS historically underestimates TIF revenues, while also underspending on its budget. To deal with budgetary shocks, CPS routinely uses its fund balance, also referred to as financial reserves, and restructures its debt to ensure that investments are maintained and contractual agreements are held up. Half-way through the school year, the district has certainty that an additional \$139 million above and beyond budgeted revenues will flow to the district due to the City's TIF surplus. Their mid-year position report shows 2,588 unfilled positions,<sup>55</sup> indicating continued underspending. And the district has ample flexibility to absorb other budgetary fluctuations due to its historically high fund balance of over \$1.1 billion, its continued access and remaining capacity for long-term or short-term borrowing, and restructuring its debt portfolio. Furthermore, the cost difference between the CTU's proposal and the district's on compensation are well within the ordinary budgetary fluctuations that the district deals with in its budgeting.

2. *CPS signs CTU labor contracts despite lacking full funding for the contract term*

Sec. 12(a-10)(4)(C) identifies one of the factors "as applicable":

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<sup>55</sup> See [https://www.cps.edu/globalassets/cps-pages/about-cps/finance/employee-position-files/employeepositionroster\\_12312024.xls](https://www.cps.edu/globalassets/cps-pages/about-cps/finance/employee-position-files/employeepositionroster_12312024.xls)

(C) Prior Collective Bargaining Agreements and the Bargaining History Between the Parties;

Financing of CTU labor contracts must also be viewed in its historical context, and considering the parties' bargaining history. The District will inevitably present its doom and gloom financial scenario, but the Fact Finder should consider that CPS *never* has all the funds necessary to finance a multi-year labor contract, and it relies on available and anticipated local, state and federal resources to meet its needs over the contract term. Thus, the "ability to pay" consideration must be viewed in its historical context.

In the prior three labor contracts since passage of the Act's amendments requiring Fact Finding, the District has always faced shortfalls in its financing of multi-year agreements. The chart below, taken from a CPS Finance Presentation on January 10, 2025,<sup>56</sup> shows the following:

2019-24 CBA

The District formally approved the CTU agreement on November 20, 2019,<sup>57</sup> during FY 2020. The District that year had an Operating Surplus of \$45 million but a Cash Balance *deficit* of -\$299 million.

2016-19 CBA

The District formally approved the CTU agreement on December 7, 2016,<sup>58</sup> during FY 2017. The District that year had a -\$150 million operating *deficit*, a *negative Fund Balance* of -\$275 million, and a *Net Cash deficit* of -\$1.037 billion.

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<sup>56</sup> See <https://drive.google.com/file/d/1Hjhi2dbrF408nsnI7b7DWr3mVb7kJP6/view?usp=sharing>

<sup>57</sup> <https://www.cps.edu/globalassets/cps-pages/about-cps/policies/administrative-hearings/collective-bargaining/cps-cba-2019-24-3.pdf> at p. 215

<sup>58</sup> [https://www.ctulocal1.org/wp-content/uploads/2018/08/CTU\\_Contract\\_2015-2019.pdf](https://www.ctulocal1.org/wp-content/uploads/2018/08/CTU_Contract_2015-2019.pdf) at p. 193.

2012-15 CBA

The District formally approved the agreement on October 24, 2012, <sup>59</sup> during FY 2013. The District that year had an Operating *deficit* of -\$120 million.

\$M	FY13	FY14 <sup>2</sup>	FY15 <sup>3</sup>	FY16	FY17 <sup>2</sup>	FY18	FY19	FY20	FY21	FY22	FY23 <sup>3</sup>	FY24
Operating Surplus/(Deficit)	(120)	(513)	(724)	(487)	(149)	599	148	45	237	276	198	7
Operating Funded Pension Cost	197	601	613	676	733	124 <sup>4</sup>	122 <sup>4</sup>	94 <sup>4</sup>	139 <sup>4</sup>	199 <sup>4</sup>	175 <sup>4</sup>	~256 <sup>4</sup>
General Fund Balance	949	436	360	(127)	(275)	324	472	517	804	1,080	1,348 <sup>3</sup>	1,355
Net Cash Balance (as of June 30)	1,090	114	(545)	(812)	(1,037)	(387)	(150) <sup>5</sup>	(299)	(144)	111	128	66
Max TANS Outstanding	n/a	131	700	1,065	1,550 <sup>1</sup>	1,095	844	830	950	800	1,150 <sup>6</sup>	1,150 <sup>6</sup>

<sup>1</sup> Includes Grant Anticipation Notes  
<sup>2</sup> FY14 includes \$131M short-term capital line of credit drawn; FY17 includes \$387M of Grant Anticipation Notes issued.  
<sup>3</sup> Change in the revenue recognition policy after year end resulted in an increased General Fund Balance as stated above.  
<sup>4</sup> Excludes pension contribution funded by new CPS pension property tax levy and State normal cost contribution starting in FY18. Includes MEABF Payments starting in FY21: \$60M, FY22 \$100M, FY23 & FY24: \$175M.  
<sup>5</sup> FY19 cash balance was approx. \$150M higher due to timing of payments and accruals.  
<sup>6</sup> CPS faced tax receipt delays in FY20 to FY23 due to pandemic and other temporary impacts on Cook County tax processing. The FY23 & FY24 TANS maximum borrowing would have been approx. \$750M if all property tax installments were paid on time.

The District’s stated concerns that it cannot afford to pay for contractual pay increases are not new, and worries in the past have not come to fruition. Warnings in 2019 that it is “not entirely clear how the district plans to pay for the contracts in the next four years” <sup>60</sup> have not come to pass, as CPS continues to operate on an even stronger financial footing, as set forth above.

The District also perpetually sounds the alarm over its “structural deficits.” In 2012 Fact Finding, the District claimed it could not afford CTU proposals because “the Board has faced at least four years of massive structural deficits exacerbated by the recession.”<sup>61</sup> (2012 Br. at 3), and further claimed, “In short, the Board’s ability to provide essential

<sup>59</sup> [https://ctucontract.wdfiles.com/local--files/pdf-contract/CTU\\_Contract\\_As\\_Printed\\_2012\\_2015.pdf](https://ctucontract.wdfiles.com/local--files/pdf-contract/CTU_Contract_As_Printed_2012_2015.pdf) at p. 165.

<sup>60</sup> <https://www.civicfed.org/civic-federation/blog/chicago-public-schools-amends-fy2020-budget-based-contract-agreements-reached>

<sup>61</sup> See [https://drive.google.com/file/d/1txJYfhqK6prATWbxjUHMcf\\_hUkp2hYay/view?usp=sharing](https://drive.google.com/file/d/1txJYfhqK6prATWbxjUHMcf_hUkp2hYay/view?usp=sharing)

services to the students and families served by CPS was repeatedly challenged by significant and increasing structural deficits.” (2012 Br. at 25). In 2016, CPS claimed, “Simply put, CPS faces a structural deficit each year. . . . In the face of the longstanding and intractable structural deficit, in recent years CPS has been forced to meet immediate cash flow and budgetary needs with massive and unsustainable debt.”<sup>62</sup> (2016 Br. at 12-13).

And in its 2019 Brief, the District alleged it couldn’t afford even the first year of the labor contract, asserting that “CPS faces a projected deficit of \$141 million in FY20.”<sup>63</sup> (2019 Br. at 4). It further claimed, “The district now faces a projected half-billion dollar deficit and must either obtain additional state funding, an uncertainty at this point, or make significant cuts” (2019 Br. at 23-24).

The above references to Fund Balances, Cash Balances and structural deficits isn’t intended to dismiss the reality of these issues, but rather, to highlight the reality that CPS *never* has the resources on hand to pay for its multi-year contracts, especially given its conservative accounting practices, though it has always found a way to pay for its agreements over the course of their term.

j. Comparison with Other Large School Districts.

Sec. 12(a-10)(4)(I) identifies one of the factors “as applicable”:

(I) a comparison of the wages, hours, and conditions of employment of the employees involved in the dispute with the wages, hours, and conditions of employment of employees performing similar services in public education in the 10 largest U.S. cities;

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<sup>62</sup> See [https://drive.google.com/file/d/1lyECzJmHGBca2Zk0\\_sbFLL3rhxwHyMs/view?usp=sharing](https://drive.google.com/file/d/1lyECzJmHGBca2Zk0_sbFLL3rhxwHyMs/view?usp=sharing)

<sup>63</sup> See [https://drive.google.com/file/d/1Ue67j08CFR\\_qkenMHVvBlZjFcKIfo8uG/view?usp=sharing](https://drive.google.com/file/d/1Ue67j08CFR_qkenMHVvBlZjFcKIfo8uG/view?usp=sharing)



The Union submits that the four school districts in Texas and Arizona (Phoenix, San Antonio, Dallas, and Houston), among the 10 largest U.S. cities, where educators have no collective bargaining rights, are inapplicable to the Fact Finder's consideration. Since educators have no right to collectively bargain, the school districts unilaterally establish all their terms and conditions of employment.

Given the purpose of statutory Fact Finding to assist the parties in arriving at agreed negotiated terms, the compensation unilaterally dictated in nonunion school districts is simply irrelevant to the CTU and does not advance the goal of assisting the parties to arrive at agreed terms.

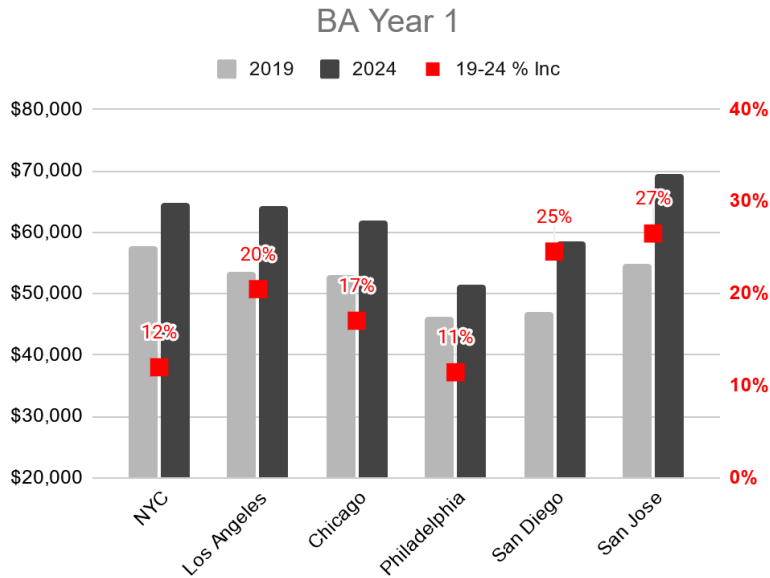
A comparison of salaries among the six unionized school districts in the 10 largest U.S. cities (New York, Los Angeles, Chicago, Philadelphia, San Diego and San Jose) shows that both salaries and the rate of salary increases for CPS educators for the period 2019-24 has lagged their counterparts in other large cities.

The most common points of comparison are the following:

- First year salaries for teachers with a Bachelor's Degree (BA)
- 10-year salaries for teachers with a BA
- 10-year salaries for teachers with a Masters Degree (MA)
- 20-year salaries for teachers with an MA

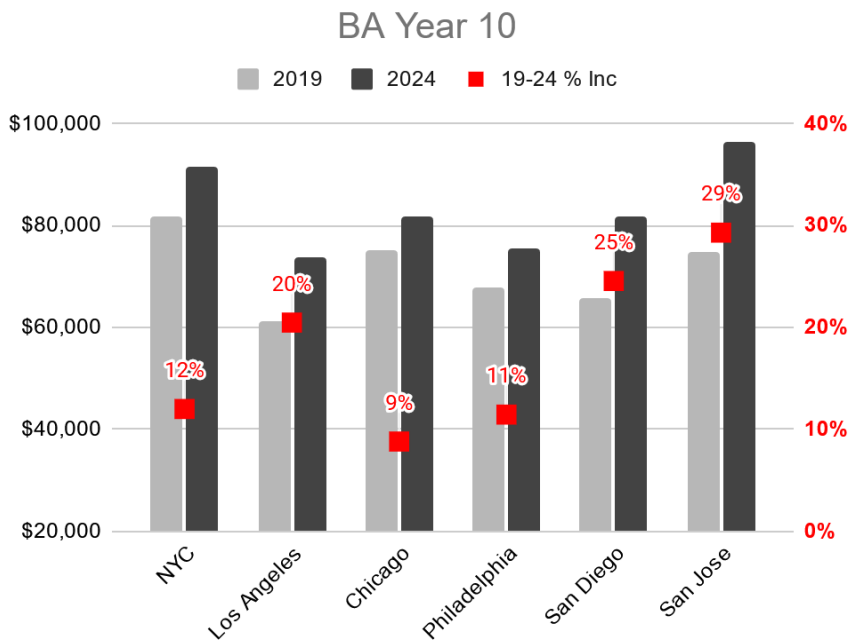
### First year salaries for teachers with a BA

The data shows that from 2019 through 2024 CPS teachers ranked fourth of six districts both in salaries and the rate of salary increases.



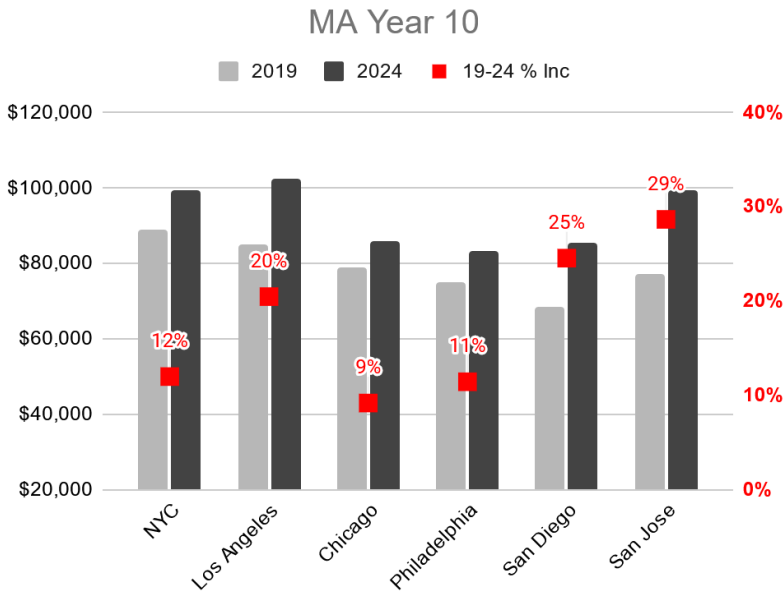
### 10-year salaries for teachers with a BA

Though the starting rate for new teachers with Bachelor's degrees has been low to mid-pack, by the tenth year of teaching the differences are far more pronounced. The data shows that from 2019 to 2024 CPS teachers received the *lowest* cumulative percentage increase among all six districts. Notably, teachers in three districts received more than *double* the average rate of increase paid at CPS, and teachers in one district receiving more than *triple* the average rate of increase paid at CPS. While CPS teachers ranked second among their peers in 2019 salary, by 2024 its ranking dropped to fourth.



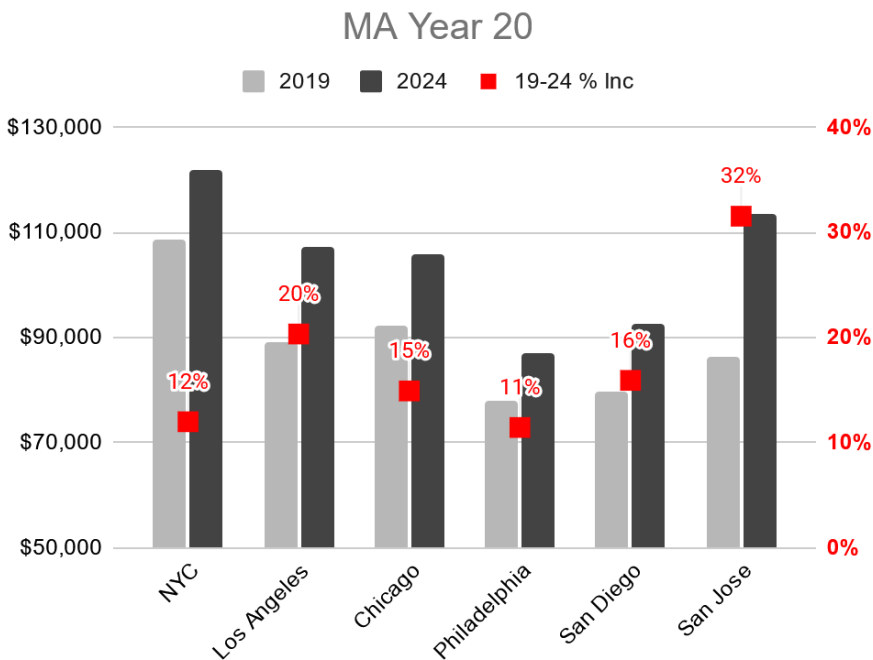
### 10-year salaries for teachers with an MA

Teachers generally earn their Masters degrees well after their date of hire. Viewing salaries for 10-year teachers with a Masters degree, CPS teachers finished *dead last* in the rate of salary increases among their peers from 2019 to 2024. Like the 10-year teachers with Bachelor's degrees, 10-year teachers with Masters degrees in three districts received more than *double* the average rate of increase paid at CPS, and those teachers in one district received more than *triple* the average rate of increase paid at CPS. In terms of actual salaries, CPS teachers started in the third position in 2019, but now are near the bottom.



20-year salaries for teachers with an MA

Experienced CPS teachers with Masters degrees have also lagged their counterparts. Their rate of salary increases from 2019 to 2024 ranks fourth out of six districts. Their actual salary rank dropped from second in 2019 to fourth in 2024.



k. Prior Bargaining Contracts have Maintained CPS Salaries at or near the top of the Large Urban School Districts

Consideration of “prior collective bargaining agreements and the bargaining history between the parties” is among the statutory Fact Finding Factors (Factor C).

Though the above charts demonstrate that CPS teachers have lost ground from 2019-24 to teachers in other large city school districts, the District has historically trumpeted the fact that CPS teachers and PSRPs were among the top paid teachers in this group, and contract settlements leading up to the current agreement have traditionally maintained the high salary ranking of CPS teachers. This fact is best shown in the District’s own statements in its prior briefs to the Fact Finding panel, as follows:

CPS 2019 Fact Finding Brief <sup>64</sup>

“CPS’ Current Compensation Leads Most External Comparable Districts.” (Br. at 20).

“CPS’ salaries have remained competitive among its comparables despite years of significant financial strain and contrary to CTU’s assertions otherwise. CPS’ current proposal maintains its position amongst its peer districts without placing the district back in fiscal crisis.” (Br. at 23).

“PSRP’s Salaries Leads all Comparable Districts

PSRP salaries have exceeded those of employees in comparable districts. Looking across teacher assistant positions, CPS’ starting salary at \$30,296 exceeds the starting salary of all ten of the comparable districts, including New York with a starting salary at \$26,446 and Los Angeles with a starting salary at \$24,820.” (Br. at 24).

CPS 2016 Fact Finding Brief <sup>65</sup>

“CBOE proposed raise (per rejected tentative agreement):

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<sup>64</sup> See [https://drive.google.com/file/d/1Ue67j08CFR\\_qkenMHVvBIZjFcKIfo8uG/view?usp=sharing](https://drive.google.com/file/d/1Ue67j08CFR_qkenMHVvBIZjFcKIfo8uG/view?usp=sharing)

<sup>65</sup> See [https://drive.google.com/file/d/1lyECzJmHGBca2Zk0\\_sbFLL3rhxwHyMs/view?usp=sharing](https://drive.google.com/file/d/1lyECzJmHGBca2Zk0_sbFLL3rhxwHyMs/view?usp=sharing)

CPS Teachers and Paraprofessionals Are and Will Remain at or near the Top in Compensation.” (Br. at 27).

“According to a highly regarded 2014 study by the National Council on Teacher Quality, Chicago teachers have the highest lifetime expected earnings among teachers in the 10 largest cities, regardless of cost of living adjustments. And, Chicago's top salary is second only to New York on an unadjusted basis, and Chicago's top paid teachers earn over \$7,904 per year more than any other teacher in the 10 largest cities when cost of living is considered.” (Br. at 28).

### CPS 2012 Fact Finding Brief<sup>66</sup>

“CPS teachers’ current compensation leads in every category among the external comparables.” (Br. at 35).

“CPS teacher salaries far surpass the scheduled salaries of teachers among the public school districts in the ten largest U.S. cities. CPS teachers earn the highest starting salary and the highest maximum salary among teachers with a Bachelor’s Degree among these external comparables. CPS teachers with Master’s Degrees also earn the highest among the external comparables in terms of both starting and maximum salary.” (Br. at 35).

Thus, based on the parties’ bargaining history, due to the unexpected Covid-era inflation shock, discussed below, that arose shortly after the 2019-24 agreement was signed, CPS employees may rightfully expect their compensation levels to be returned to their traditional high standing in the 2025-29 agreement.

#### 1. Teacher and PSRP Retention

Though the Act doesn’t specifically identify employee retention as a factor, it nevertheless refers to the “interests and welfare of the public and the students and families served by the employer” (Factor E) and “the effect [that a disputed term] has

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<sup>66</sup> See [https://drive.google.com/file/d/1txJYfhqK6prATWbxjUHMcf\\_hUkp2hYay/view?usp=sharing](https://drive.google.com/file/d/1txJYfhqK6prATWbxjUHMcf_hUkp2hYay/view?usp=sharing)

or may have on the overall educational environment, learning conditions, and working conditions with the school district” (Factor M).

The Union submits that encouraging the retention and development of experienced teachers and support staff is a crucial consideration in maintaining the quality of education in the District and better serving all public education stakeholders.

Regarding PSRPs, though the parties have made some significant improvements to PSRP compensation, there remains a long way to go, considering the very diverse and ever changing roles of the employees CTU represents under the PSRP title. PSRP is a term that represents school based, network and district level staff and requires varying levels of education and experience levels. The federal government standard for 2024 for a family of four who earns so little that their children are eligible for free or reduced lunch is \$57, 720 per year<sup>67</sup>. Over 1500 of the approximately 3500 PSRPs represented by CTU qualify for a free or reduced price school lunch under federal income poverty guidelines for a family of four. The Union's proposal to reduce PSRP multi-year steps and allow a Lane 4 for those PSRP positions whose position requires a Master’s Degree does more to bridge the income gap, more appropriately compensates veteran PSRP employees and encourages them to stay within the district.

Regarding teachers, the Union’s proposal to establish regular teacher steps through 25 years of service would remove the effective penalty suffered by

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<sup>67</sup> <https://www.federalregister.gov/documents/2024/02/20/2024-03355/child-nutrition-programs-income-eligibility-guidelines#p-15>

experienced teachers, whose salaries diminish over time relative to their nearby suburban counterparts. The data shows that, while starting teacher salaries at CPS are higher than Chicago suburban districts, suburban districts offer substantially higher compensation to experienced teachers. The suburban Chicago data aligns with the other large urban school districts discussed above, whose experienced teachers have recently received significantly higher salary increases.

The teacher compensation information for Chicago and its suburbs currently paints a bleak picture for the experienced teachers who remain at CPS. The 2024 Teacher Salary Study Report, <sup>68</sup> which ISBE publishes, reviews total compensation statewide for teachers in all districts and shows the following:

Starting Compensation with Bachelors Degree

The good news here is that CPS ranks almost at the top for starting salaries. However, as teachers move deeper into their careers, suburban districts with far more step increases than CPS quickly overtake CPS for teacher salaries.

Rank #	District Name	Bachelor's Beginning Salary
1	Maine Township HSD 207	\$66,581.00
2	City of Chicago SD 299	\$66,330.00
3	Glenbrook HSD 225	\$65,979.00
4	Evanston Twp HSD 202	\$64,103.00

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<sup>68</sup> <https://www.isbe.net/Pages/TeacherSalaryStudy.aspx>



Starting Compensation with Masters Degree

For teachers with a Masters degree, total compensation is lower, though still in the top 10 for school districts.

Rank #	District Name	Master's Beginning Salary
1	Glenbrook HSD 225	\$76,584.00
2	New Trier Twp HSD 203	\$72,431.00
3	Roselle SD 12	\$71,830.00
4	Maine Township HSD 207	\$71,680.00
5	Niles Twp HSD 219	\$71,033.00
6	Twp HSD 113	\$70,974.00
7	City of Chicago SD 299	\$70,924.00

10-year teachers with Masters

Once teachers gain significant experience and academic credentials, the suburban districts quickly overtake CPS. For teachers in this category, their ranking drops to 16.

Rank #	District Name	MASTERS 10TH YEAR SALARY
1	Township HSD 211	\$100,105.00
2	Evanston Twp HSD 202	\$99,999.00
3	Riverside-Brookfield Twp SD 208	\$99,999.00
4	Leyden CHSD 212	\$99,410.00
5	River Forest SD 90	\$99,108.00
6	Glenbard Twp HSD 87	\$98,814.00
7	Adlai E Stevenson HSD 125	\$98,540.00
8	Lake Forest CHSD 115	\$97,522.00
9	Lake Park CHSD 108	\$97,504.00
10	New Trier Twp HSD 203	\$97,055.00
11	Twp HSD 113	\$96,075.00
12	Lyons Twp HSD 204	\$95,294.00
13	Maine Township HSD 207	\$93,071.00
14	Oak Park - River Forest SD 200	\$93,071.00
15	Hinsdale Twp HSD 86	\$92,047.00
16	City of Chicago SD 299	\$92,016.00

Maximum for teachers with Masters

As discussed elsewhere, the CPS contract is devoid of meaningful steps after 14 years, and the Union proposes to address, if not fully remedy, this imbalance by establishing regular steps through the 25<sup>th</sup> year of employment.

The data shows that currently, CPS teachers with Master’s degrees at the highest step rank 40<sup>th</sup> among school districts, and receive \$40,000 less in annual compensation than the top ranked district.

Rank #	District Name	Master's Maximum Salary	Master's Years to Max
1	Leyden CHSD 212	\$157,365.00	29
2	Glenbrook HSD 225	\$144,380.00	33
3	Twp HSD 113	\$142,539.00	28
4	Adlai E Stevenson HSD 125	\$139,871.00	30
5	Maine Township HSD 207	\$137,700.00	26
6	New Trier Twp HSD 203	\$137,607.00	25
7	Wheeling CCSD 21	\$136,395.00	14
8	CHSD 128	\$135,192.00	34
9	Evanston Twp HSD 202	\$134,993.00	29
10	Lake Forest CHSD 115	\$134,456.00	23
40	City of Chicago SD 299	\$117,760.00	27

m. Chicago Police Department Contract

In another major CBA in Chicago, the CPD agreed to 5% COLAs for the first two years of the contract with the Fraternal Order of Police - the same two calendar years in dispute in this proceeding. In addition to the COLA raises, the CPD also granted significant structural salary

changes and bonuses <sup>69</sup>, amounting to \$49 million in costs beyond COLA for 2024, or 4.3% of FOP salary costs. In subsequent years the costs amount to a little under 2%.<sup>70</sup> Considering that the combined cost of the CTU’s proposed Step changes for teachers and paraprofessionals ranges from \$18 million in the first to \$34 million in the final year of the contract, or from 0.6% to 1.1% of the budgeted salary of CTU members (\$30 million is costed as a 1% increase), the Union’s proposed structural step changes are reasonable.

n. Cost of Living in Urban Areas

Sec. 12(a-10)(4)(J) identifies one of the factors “as applicable”:

(J) the average consumer prices in urban areas for goods and services, which is commonly known as the cost of living;

Factor C also requires that the Fact Finder consider the impact of the parties’ prior agreements:

(C) prior collective bargaining agreements and the bargaining history between the parties;

*The Covid-Era Inflation Shock*

Everyone in Chicago experienced an inflationary spike to the cost of living in 2021 and 2022, before inflation began to subside in 2023. Monthly inflation reached a peak of 9.1% in June 2022, and from January 2020 through December 2024, the cost of living rose 22.3%. <sup>71</sup>

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<sup>69</sup><https://www.bettergov.org/2023/12/12/hidden-costs-proposed-fop-contract-contains-millions-in-raises-new-protections-from-discipline/> ; <https://www.bettergov.org/2023/11/29/johnson-proposes-historically-large-pay-raises-for-police/>

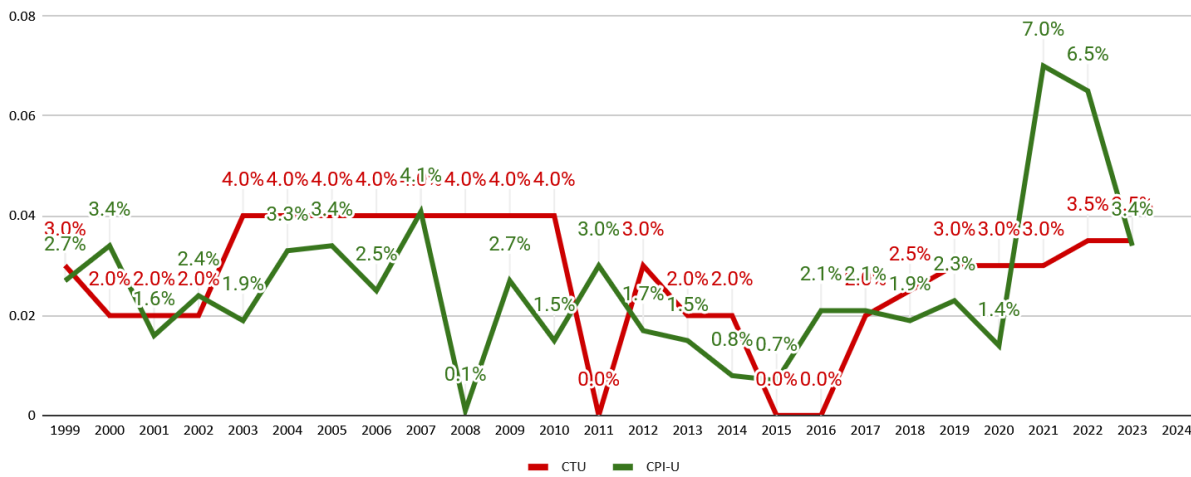
<sup>70</sup> [Exhibit on calculations of CPD contract](#)

<sup>71</sup> [https://www.bls.gov/regions/mid-atlantic/data/consumerpriceindexhistorical\\_us\\_table.htm](https://www.bls.gov/regions/mid-atlantic/data/consumerpriceindexhistorical_us_table.htm)

CTU bargaining unit members suffered particularly from this inflation, because their pay increases were locked in by a contract settled in November, 2019, just months before the Covid pandemic, and when no one anticipated this generational inflation shock.

The chart below shows an historical comparison of CTU cost-of-living adjustments (“COLA”) and the Consumer Price Index for All Urban Consumers (“CPI-U”) since 1999.

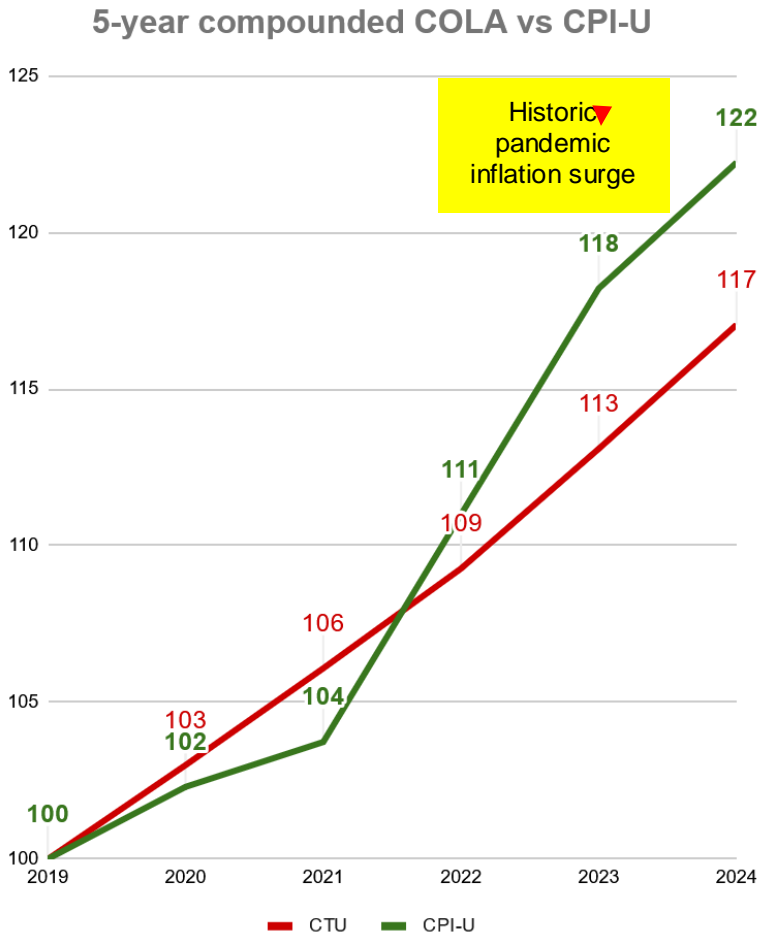
**CPI-U vs CTU COLA History**



As the chart makes clear, CTU COLAs roughly tracked CPI-U from 1999 through 2020. But in 2021 and 2022, the inflationary shock drove CPI-U to vastly exceed the COLA raises that CTU had settled with CPS in 2019. CTU’s members’ real earnings effectively declined during this time, as inflation greatly outpaced the contract COLA.

Comparing compounded CPI-U versus the COLA raises in the last contract shows the impact on CTU’s membership. During the 2019-24 contract cycle, the cost of living has increased by about 22%, while COLA raises have increased employees’ pay by only about 17%.

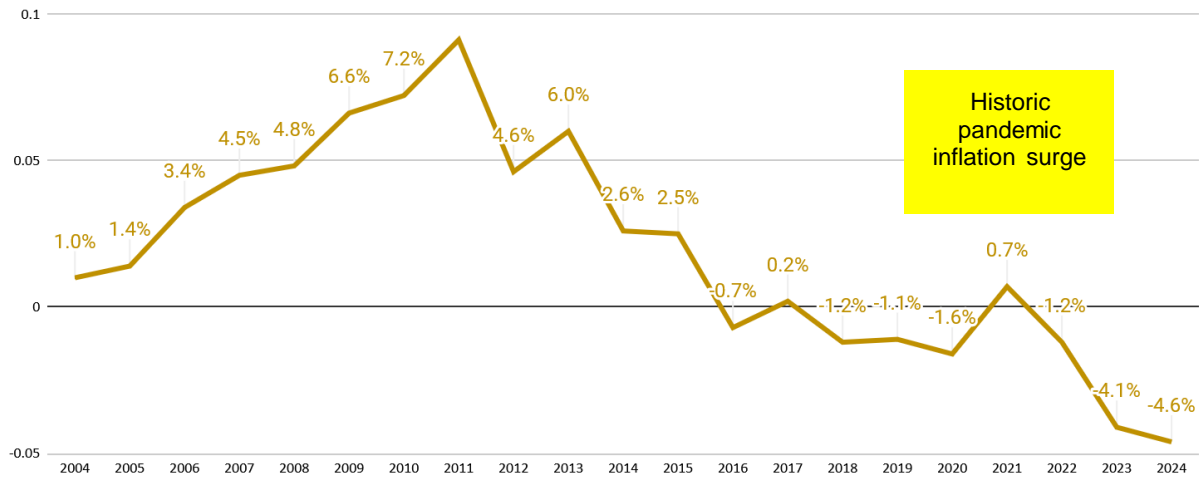
This difference represents an approximate 4.2% *decrease* in employees’ ability to pay for the costs of daily life.



Another way of depicting the historic trend of COLA vs. CPI-U is in the chart below. By taking the rolling 5-year cumulative total (non-compounded) difference between the two measures, we can even out the annual fluctuations in CPI-U (commonly known as “smoothing”) and see how salaries and inflation were trending. The chart below shows that prior to 2015, in any given year members had enjoyed an advantage over inflation over the prior 5 years. After 2015, this measure dropped slightly into the negative, meaning members experienced raises

outpaced by inflation over the prior 5 years, and dropped sharply in recent years with the rise in inflation.

COLA vs CPI-U History (5-year rolling cumulative total difference)

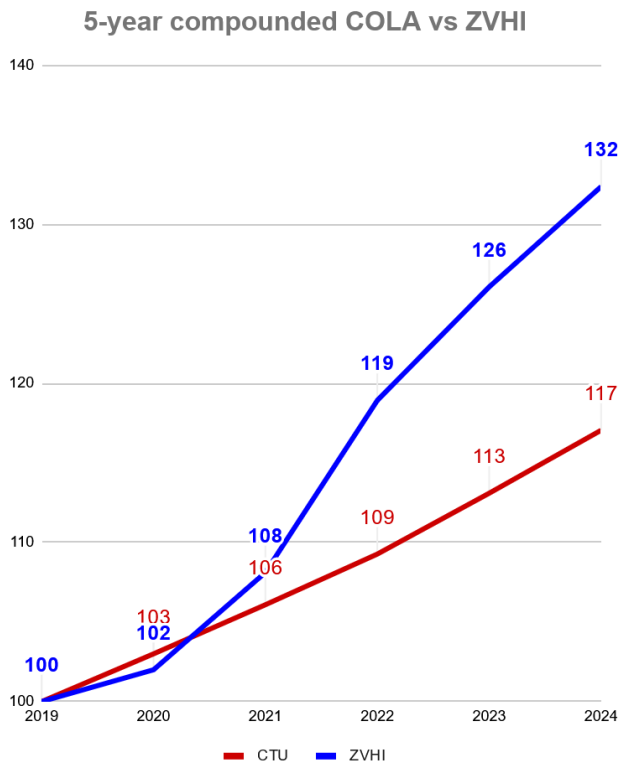


The chart above depicts the difference between rolling COLA increases and rolling CPI-U increases, with a positive number representing COLA increases exceeding inflation and a negative number representing inflation exceeding the COLA.

### *Increased cost of Housing*

CPS employees are required to live within the Chicago city limits. The cost of housing within Chicago has even further outpaced the COLAs received by CTU bargaining unit employees, to an even greater degree than CPI-U increases as a whole. From 2019 to 2024, the Zillow Home Value Index has increased 32 percent compounded within the City of Chicago<sup>72</sup> — 25% more than the COLAs CTU bargaining unit employees were granted across that time period.

<sup>72</sup> Zillow Home Value Index (ZHVI) All Homes Time Series, for the city of Chicago. Available from: <https://www.zillow.com/research/data/> (last accessed January 17, 2025).



CTU’s members need raises that will regain this ground lost to the inflationary shock and dramatic increases in the cost of housing. That is, CTU’s members need raises in the next contract that *well exceed* anticipated overall rates of inflation. Without raises exceeding anticipated inflation, CTU’s members will suffer permanently from the inflation shock under the 2019-24 agreement.

Though the parties have agreed that the third and fourth years of the agreement peg raises to inflation, at least in part, the first two years must accordingly make up for a 5% decrease in buying power just to break even, and require additional salary increases to show any improvement in the standard of living.

## 2. Staffing

The Union has advanced a package of targeted staffing proposals designed to address some of the school district's most pressing needs. CTU and CPS were able to make significant strides on staffing levels in the 2019 CBA. Further, at CTU's urging, CPS in 2024 did away with its former staffing model (known as "Student-based Budgeting") that effectively punished many high-needs schools by providing them fewer baseline positions, and replaced it with an equity-based staffing model.<sup>73</sup> These staffing investments have all redounded to the benefit of CPS students and families, as CPS students had some of the largest post-pandemic academic gains of any school district in the country.<sup>74</sup>

In view of this, and in order to preserve these gains, CTU has proposed that CPS agrees to maintain its equity staffing model in place for the 2024-25 school year for the duration of the successor CBA, except as improved upon by the CBA. The Union views this proposal as critical, as without such a commitment, the district may attempt to finance other initiatives and commitments by reducing staffing ratios secured in the last CBA.

It is also important to note at the outset that the adequacy targets under Illinois' evidence-based funding (EBF) model for state funding to school districts is based, in part, on staffing ratios. The Union's proposals are aligned with the EBF staffing ratios adopted by the state.<sup>75</sup>

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<sup>73</sup> See <https://www.chalkbeat.org/chicago/2024/03/21/chicago-public-schools-ending-student-based-budgeting/#:~:text=Chicago%20Public%20Schools%20plans%20to,additional%20funding%20based%20on%20need>

<sup>74</sup> See <https://news.wttw.com/2024/02/19/cps-shows-strong-academic-recovery-after-covid-19-pandemic-study-finds>.

<sup>75</sup> See [Center for Tax and Budget Accountability, Analysis of SB1947](https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act) (Public Act 100-0465): The Evidence-Based Funding for Student Success Act (Oct.10,2017), <https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act>. at p. 15.



a. Teacher Assistants

Teacher Assistants play a critical role in schools at every grade level, but are of particular importance when it comes to addressing some of the biggest challenges CPS faces. These challenges include supporting English language learner students, students with disabilities, and students in preschool through 2nd grade; and ameliorating the impacts of oversized classes in all grades. While the scope of each of these challenges has only increased in recent years, the number of teacher assistants the school district employs has decreased.

As of 2012, CPS was required to employ 900 teacher assistants in elementary schools and 900 teacher assistants in high schools.<sup>76</sup> In 2014, CPS employed 407 special education-coded teacher assistants.

CPS currently serves approximately 70,400 students classified as English language learners and approximately 44,000 students with disabilities; and in 2023 more than 200 schools had classes that exceeded that class size limits under the 2019-2024 CBA resulting in the parties Joint Class Size Committee awarding 354 “class size” positions under Article 28.<sup>77</sup> But the school district currently employs only 952 teacher assistants, only 98 of whom are bilingual, and only 15 of whom are coded for special education support.<sup>78</sup>

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<sup>76</sup> See [https://drive.google.com/file/d/1N\\_FvSrXs3rfPVwqDsIYgOp5F0koP-bti/view](https://drive.google.com/file/d/1N_FvSrXs3rfPVwqDsIYgOp5F0koP-bti/view)

<sup>77</sup> See, [https://www.cps.edu/academics/language-and-culture/english-learners-program/#:~:text=There%20are%20about%2070%2C400%20students,Learners%20\(ELs\)%20at%20CPS;%20https://www.cps.edu/about/stats-facts/](https://www.cps.edu/academics/language-and-culture/english-learners-program/#:~:text=There%20are%20about%2070%2C400%20students,Learners%20(ELs)%20at%20CPS;%20https://www.cps.edu/about/stats-facts/) and <https://www.ctulocal1.org/posts/more-good-news-about-class-size-relief/>

<sup>78</sup> <https://www.cps.edu/about/finance/employee-position-files/>

In June of 2024, CPS laid off almost 600 support staff personnel, nearly 300 of whom were teacher assistants (many of whom were teacher assistants assigned to oversized classes under the 2019-2024 CBA).<sup>79</sup>

The Illinois EBF Adequacy Targets, which drive the funding CPS receives from the State, call for 1 “supervisory aide” (i.e., teacher assistant) per 225 elementary school students, and 1 per 200 high school students.<sup>80</sup>

The Union initially proposed that the Board employ and maintain an additional 1,500 teacher assistants for elementary schools and 1,000 for high schools, and made a series of additional teacher assistant staffing ratio requests in discrete areas. The Union has since significantly moderated that proposal, and is now proposing that, by the 2027-28 school year, CPS hire an additional 700-800 teacher assistant positions, inclusive of teacher assistants assigned to provide relief to oversized classes, bilingual teacher assistants to support English language learner students, early childhood education teacher assistants, and teacher assistants to provide support to special education students.

This proposal is aligned with reversing the June 2024 teacher assistant layoffs, the number of positions anticipated to be awarded for oversized class relief, meeting the needs of the district’s growing number of English language learner students, and minimally restoring the number of teacher assistants assigned to provide special education support to the number from

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<sup>79</sup> See <https://chicago.suntimes.com/education/2024/06/27/chicago-public-schools-lays-off-nearly-600-support-staff-members#:~:text=The%20school%20district%20acknowledged%20Thursday,find%20jobs%20in%20other%20schools>

<sup>80</sup> See [Center for Tax and Budget Accountability, Analysis of SB1947](https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act) (Public Act 100-0465): The Evidence-Based Funding for Student Success Act (Oct.10,2017): <https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act>. at p. 15.

2014, when the school district served a smaller number of students with disabilities than it does now. The school district is currently failing to provide hundreds (if not thousands) of students with paraprofessional support services they are entitled to by law in connection with IEPs. As of November 2024, there were 457 vacant special education paraprofessional positions, that, minimally, hundreds of which could be filled by teacher assistants. Moreover, significant portions of the cost for teacher assistants assigned to provide paraprofessional support services to students with disabilities is subject to federal reimbursement.<sup>81</sup>

The Union's current proposal on teacher assistant staffing is a significant compromise, financially achievable, in line with historical standards of the parties, would move the school district much closer to state EBF Adequacy Targets and compliance with providing students with disabilities and English Language Learners the services to which they are entitled, and should be recommended by the fact-finding panel and adopted by the parties.

b. Librarians

CPS faces a critical shortage of libraries and librarians. Approximately 80% of CPS schools do not have a librarian. Across 514 district-run schools, CPS employs only 107 librarians. CTU and Chicago Sun-Times analyses in 2022 found that only 10% of the schools where Black students are the largest percentage of the student body had a librarian; conversely 25% schools where white students the majority and 21% where Hispanic students are the majority had librarians.<sup>82</sup>

The Illinois State Board of Education recommends that school districts employ one librarian for every 600 high school students and one librarian for every 450 elementary school

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<sup>81</sup> See [https://www.isbe.net/Documents/sped\\_pupil\\_reim\\_fiscalpro.pdf](https://www.isbe.net/Documents/sped_pupil_reim_fiscalpro.pdf)

<sup>82</sup> See <https://chicago.suntimes.com/education/2024/10/29/ctu-libraries-librarians-chicago-public-schools>

students.<sup>83</sup> Further, these are the ratios called for by the Illinois EBF Adequacy Targets, which drive the funding CPS receives from the State.<sup>84</sup>

The Union’s initial proposal on librarian staffing was for at least one centrally funded librarian at each CPS school, and for the Board to make best efforts to comply with the ISBE recommended staffing ratios. The parties have agreed to work towards the goal that every school in the district has a librarian by the last year of the Agreement, and jointly advocate for additional state funding for librarians. In view of the currently available labor pool, the Board’s financial constraints, the costs of other proposals, and in the interest of achieving a settlement, the Union has since moderated its proposal on librarians significantly. The Union is proposing that the Board ensure a net increase of at least 30 librarians positions per year in FY26, FY27, and FY28. The Board’s current offer is only a net increase of at least 10 librarian positions per year in those years.

The Union’s proposal is a significant compromise, financially achievable, would move the school district much closer to compliance with recommended staffing ratios, and should be recommended by the fact-finding panel and adopted by the parties.

c. Nurses

In the 2019 CBA, the Board agreed (in Article 49-3) that “by no later than July 30, 2023, the BOARD will assign at least one full-time nurse to each school in the District.” This was obviously a significant achievement and improvement to the availability of nursing services to

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<sup>83</sup> See <https://www.isbe.net/Documents/School-Admin-One-Pager.pdf>

<sup>84</sup> See [Center for Tax and Budget Accountability, Analysis of SB1947](https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act) (Public Act 100-0465): The Evidence-Based Funding for Student Success Act (Oct.10,2017), <https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act>. at p. 15.

CPS students. But CPS still falls far short of recommended staffing ratios for school nurses. The National Association of School Nurses (NASN) recommends that school districts employ one school nurse for every 750 general education students; 1:225 in student populations requiring daily professional school nursing services; and 1:125 in student populations with complex health care needs.<sup>85</sup> Further, these are the ratios called for by the Illinois EBF Adequacy Targets, which drive the funding CPS receives from the State.<sup>86</sup>

CPS had an enrollment of 270,339 on the 20th day of the current school year, and 16.4% (or approximately 44,000) of those students have been identified as students with disabilities.<sup>87</sup> CPS currently employs approximately 590 school nurses, putting it far short of the recommended staffing ratios.

While the number of CPS school nurses (590) currently exceeds the number of CPS district-run schools (514), dozens of schools do not have a nurse assigned every school day. This is the case because many large schools require more than one nurse, and many nurses serve students at multiple schools (often in connection with services under IEPs and 504 plans) such that they are assigned to different schools on different days of the week. Furthermore, the number of budgeted school nurse positions total 658 as of December 2024, suggesting that CPS filling vacant positions would make the Union's proposal imminently achievable at little to no additional cost.

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<sup>85</sup> See <https://pubmed.ncbi.nlm.nih.gov/21291082/#:~:text=NASN%20recommends%20a%20formula%2Dbased,interventions%2C%201%3A125%20in%20student>.

<sup>86</sup> See [Center for Tax and Budget Accountability, Analysis of SB1947](https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act) (Public Act 100-0465): The Evidence-Based Funding for Student Success Act (Oct.10,2017), <https://www.ctbaonline.org/reports/analysis-sb-1947-public-act-100-0465-evidence-based-funding-student-success-act>. at p. 15.

<sup>87</sup> See <https://www.cps.edu/about/stats-facts/>

The Union's initial proposal on nurse staffing was for CPS to comply with the NASN recommended ratio. The Union has since moderated its position, and is currently proposing that CPS staff at least one school nurse to every school in the district every instructional day. The Board has made no proposal on nurse staffing.

The Union's proposal is a significant compromise, financially achievable, would move the school district much closer to compliance with recommended staffing ratios, and should be recommended by the fact-finding panel and adopted by the parties.

d. Fine Arts/Electives

In 2012, CPS created an expansive arts plan that created a goal of one Fine Arts teacher for every 350 students.<sup>88</sup> At present, 27% of schools are still short of CPS's 13-year-old goal.<sup>89</sup>

Access to Fine Arts and electives courses in CPS is grossly inequitable, largely along geographic and racial lines. Less than 17% of CPS elementary schools have three or more certified fine arts teachers. 47% of schools - including 21 high schools - have only 1 Fine Arts teacher, and 50 schools do not have a single Fine Arts teacher on staff.<sup>90</sup>

The Union and the Board have reached a tentative agreement on a minimum of three (3) centrally-funded elective/holistic teacher positions at each school - inclusive of dance, music, visual art, media art, foreign language, physical education, technology/computer, photography/digital media, drama, public speaking, and library studies. This is significant progress and will be a meaningful improvement for many schools.

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<sup>88</sup> See [https://ingenuity-dataviz.shinyapps.io/sota\\_dashboard\\_sy23/](https://ingenuity-dataviz.shinyapps.io/sota_dashboard_sy23/)

<sup>89</sup> See <https://chicago.suntimes.com/education/2024/09/16/more-arts-classes-in-cps-schools-is-an-easy-sell-paying-for-it-finding-teachers-is-the-real-feat>

<sup>90</sup> Id.

The schools that struggle the most with access to arts are small schools, often in historically disinvested neighborhoods in the city. At these schools, it is likely only one of the holistic positions will be used for Fine Arts, as school budgets will require the other holistic positions be devoted to physical education and other required courses. These schools end up in an enrollment spiral, where it is difficult for the school district to sufficiently staff a robust complement of enrichment course offerings due to the small number of students enrolled, and fewer and fewer parents send their children to the schools because of the limited offerings.

To address this, the Union has proposed, and the parties have made progress on reaching an agreement on, the creation of regional (“Network-based”) fine arts positions. (CPS is organized into 18 regional networks, for purposes of administrative support, instructional support, and liaison between schools and district administration.<sup>91</sup>) Teachers in these positions would be staffed at network offices and assigned to serve multiple small schools in a week, so as to expand the number of Fine Arts classes small schools that are otherwise only able to offer one Fine Arts class. The Union is currently proposing that “For every four schools within an elementary network that have a vacant or only one art position at the start of the school year, the Board shall assign one fine arts teacher to that network per 4 schools.” The Board is proposing, “For every four schools within an elementary network that have a vacant position at the start of the school year, the Board shall assign one fine arts teacher to that network.”

This proposal will enable thousands of students to have access to Art *and* Music classes, for instance, instead of just one or another. And it would do so in a financially manageable way for the school district, requiring just an additional 39 arts teachers. The Union’s proposal is a significant compromise, financially achievable, would move the school district much closer to

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<sup>91</sup> See <https://www.cps.edu/schools/networks/>

meeting the modest goals it set for itself over a dozen years ago, and should be recommended by the fact-finding panel and adopted by the parties.

e. Counselors

The Union and the Board agree on the importance of school counselors. Last year, CPS CEO Pedro Martinez said, “School counselors are fundamental to the health, safety, and academic success of our students. Not only do our counselors support students’ social and emotional needs, but school counselors are uniquely positioned to provide targeted support to students to ensure they are prepared to achieve their post-secondary dreams.”<sup>92</sup> CPS Chief Education Officer Bogdana Chkoumbova has said, “School counselors have an amazing impact on the success of CPS students, both in and outside our classrooms [...] supporting the mental, physical, emotional, and academic success of our students.”<sup>93</sup>

Due to the Union’s advocacy, CPS has made significant improvements in counselor staffing in recent years, but still lags behind recommended ratios. The American School Counselor Association (ASCA) recommends a ratio of one school counselor to every 250 students. The school district currently employs 886 school counselors for a district enrollment of 270,339 students.<sup>94</sup> This makes the student-to-counselor ratio 305:1.

The Union’s initial proposal was that the Board abide by ASCA’s recommended staffing ratios. The Union has since significantly moderated its position, and its current proposal is that the number of counselors be increased by 300 positions by 2027-28 school year. The Union’s

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<sup>92</sup> See <https://www.cps.edu/press-releases/chicago-public-schools-celebrates-national-school-counseling-week/#:~:text=CPS'%20investments%20in%20school%20counselors,ASCA%2C%20is%20408:1>

<sup>93</sup> Id.

<sup>94</sup> See <https://www.cps.edu/about/finance/employee-position-files/>, and <https://www.cps.edu/about/finance/employee-position-files/>



proposal is a significant compromise, financially achievable, would move the school district to compliance with recommended staffing ratios, and should be recommended by the fact-finding panel and adopted by the parties.

f. Social Workers

In the 2019 CBA, the Board agreed (in Article 49-2) that “by no later than July 30, 2023, the BOARD will assign at least one full-time social worker to each school in the District.” This was obviously a significant achievement and improvement to the availability of nursing students to CPS students. But CPS still falls far short of the recommended staffing ratios for school nurses.

The National Association of School Social Workers (NASW) recommends that school districts employ 1 social worker for every 250 general education students.<sup>95</sup> The Union’s initial proposal was that the Board agree to abide by the NASW’s staffing recommendations.

The Board currently employs 684 social workers.<sup>96</sup> While this is a number greater than the 514 district-run schools,

The Union has since modified its proposal significantly, such that its current proposal is that, by the 2027-28 school year, the Board would assign at least 1 social worker to every school every instructional day. This can be achieved at little or no additional cost if the district simply filled its vacancies. As of September 2024, with 632 social workers scheduled across district

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<sup>95</sup> See <https://www.socialworkers.org/Practice/NASW-Practice-Standards-Guidelines/NASW-Standards-for-School-Social-Work-Services#:~:text=School%20social%20work%20services%20should,1%3A50%2C%20is%20suggested.>

<sup>96</sup> See [https://www.cps.edu/about/finance/employee-position-files/.](https://www.cps.edu/about/finance/employee-position-files/)

schools, an additional 45 positions would have been sufficient to ensure a social worker assigned to a school every day. The district has budgeted for 684 total social workers.

The cost of this proposal can also be significantly defrayed by the fact that social work services are subject to Medicaid reimbursement, for both services provided to special education students with IEP or 504 Plan social work service minutes, and for general education students.<sup>97</sup> School district data suggests CPS is nowhere near requesting reimbursement for all qualifying social work services, as the district has responded to information requests concerning this matter providing no data whatsoever concerning reimbursement for social work services provided to general education students.<sup>98</sup> (See.) CPS has provided no evidence whatsoever that the district has availed itself of assistance provided by the Illinois Department of Healthcare and Family Services (through the Health Schools Campaign Medicaid Expansion for School Health (MESH) Learning Collaborative) to ensure it is maximum Medicaid reimbursement through technical assistance in Medicaid billing expansion and Medicaid outreach.

The Union's proposal is a significant compromise, financially achievable, would move the school district much closer to compliance with recommended staffing ratios, and should be recommended by the fact-finding panel and adopted by the parties.

g. Case Managers

The Board and the Union have made significant progress toward an agreement on staffing ratios for special education case managers. Unfortunately, CPS has struggled for many years to maintain special education compliance. A 2018 Illinois State Board of Education report found that the school district systematically delayed and denied services to students with

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<sup>97</sup> See <https://healthyschoolscampaign.org/programs/medicaid-expansion-for-school-health/#about>

<sup>98</sup> See <https://drive.google.com/file/d/1MLgDZE9Sp-YhGMqHRGq5zym-BZ93iPbi/view?usp=sharing>

disabilities, in violation of state and federal law.<sup>99</sup> The school district's special education program was consequently put under state monitorship, which extended through most of the term of the parties' 2019-2024 CBA.<sup>100</sup>

Adequate case manager staffing is critical for CPS to maintain compliance with state and federal law and ensuring all students with disabilities are receiving the services to which they are legally entitled.

The parties are in agreement that when a school reaches 34 students with an IEP, that triggers the allocation of a half-time ("0.5") case manager position. The parties differ, however, on the number at which a full-time case manager position should be awarded, and the increments of additional IEPs at which additional case manager positions are awarded. The Union's current proposal is that a full-time case manager position would be awarded when a school reaches 65 IEPs, and that an additional 0.5 case manager position would be awarded with every additional 65 IEPs. The Board's current proposal is that a full-time case manager position would be awarded when a school reaches 70 IEPs, and that an additional 0.5 case manager position would be awarded with every additional 70 IEPs.

Given CPS's troubled history in the very recent past of maintaining special education compliance, the school district should be making every investment it can in ensuring students with disabilities are receiving their legally mandated services. The space between the parties position is small, a matter of just 29 positions, and the importance of this issue and CPS's track record weigh in favor of adopting the Union's proposal.

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<sup>99</sup> See [https://www.isbe.net/Documents/Public\\_Inquiry\\_Final\\_Report.pdf](https://www.isbe.net/Documents/Public_Inquiry_Final_Report.pdf)

<sup>100</sup> See <https://www.isbe.net/monitor>

h. Technology Coordinators

In 2025, access to functioning technology is paramount for a school building to function and for students and teachers to have access to instructional materials. CPS currently employs only 164 Technology Coordinators for 514 district-run schools, and subcontracts a considerable amounts of its school-based IT work.<sup>101</sup>

The Union initially proposed that each school in the district be staffed with at least one (1) Technology Coordinator position. The Board rejected that proposal. But the parties have made considerable progress toward an agreement on Technology Coordinator staffing since that time. The parties are in agreement that, starting in the 2025-26 school year, the Board will reduce its reliance on subcontracted technology coordinators, with the goal of phasing them out by the expiration of the successor Agreement, except for short-term substitute and supplemental services. The parties are also in agreement that the Board will assign at least two centrally funded Technology Coordinators to each of the 18 geographic networks in the district in the 2025-26 school year. The parties are further in agreement that in each subsequent year of the contract, one additional centrally-funded Technology Coordinator will be added to each network, resulting in a total of at least four Technology Coordinators per network by the end of the Agreement. The Union is also proposing that the Board agree to at least maintain the current number of school-based bargaining unit Technology Coordinator and Computer Technician positions for the duration of the Agreement. To this point, the Board has rejected that proposal.

The Union views the commitment to maintain the current staffing levels for school-based technology coordinators and computer technicians as a vital component of this proposal.

Without it, the creation of the network technology coordinator positions very likely would not be

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<sup>101</sup> See <https://www.cps.edu/about/finance/employee-position-files/>

a net benefit and could simply result in network technology coordinator positions replacing existing school-based positions. Absence of an agreement to maintain school-based Technology Coordinator staffing levels could also undercut the Board's commitment to reduce its reliance on subcontracted Technology Coordinators.

This is an eminently reasonable proposal, given the modesty of the agreed phase-in of the network-based positions, the importance of these roles, and the Board's acknowledgement of the need to reduce reliance on subcontracted technology coordinators. It should be recommended by the fact-finding panel and adopted by the parties.

i. English Learner Program Teacher (ELPTs)

English Learner Program Teachers (ELPTs) are responsible for coordinating services provided to English language learner (ELL) students in schools. The importance of these roles has only grown as the school district's ELL population has increased. CPS serves approximately 70,400 ELL students.<sup>102</sup>

Under the expired CBA, the ELPT staffing ratios were such that schools with 20-150 ELLs were allocated with a half-time ELPT position, schools with 150 to 600 ELLs received a full-time ELPT position, and schools with 600 or more ELLs received 2 full-time ELPT positions. A stipend structure also exists under expired CBA whereby Schools with 1-49 ELLs receive a \$1,000 stipend, schools with 50-99 ELLs receive a \$1,500 stipend, schools with 100-199 receive a \$2,000 stipend, schools with 200-249 receive a stipend of \$2,500 stipend, and schools with 250 or more ELLs receive a \$3,000 stipend.

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<sup>102</sup> See [https://www.cps.edu/academics/language-and-culture/english-learners-program/#:~:text=There%20are%20about%2070%2C400%20students,Learners%20\(ELs\)%20at%20CPS](https://www.cps.edu/academics/language-and-culture/english-learners-program/#:~:text=There%20are%20about%2070%2C400%20students,Learners%20(ELs)%20at%20CPS)

The parties have reached agreement in principle on reducing the ELPT ratios to what is shown below, but the Board has conditioned its proposal on eliminating the ELPT stipend structure altogether.

<u># of EL students</u>	<u># of ELPT Position Allocated</u>
<u>20-49</u>	<u>.5 FTE</u>
<u>51-300</u>	<u>1.0 FTE</u>
<u>301-599</u>	<u>2.0 FTE</u>
<u>600-899</u>	<u>3.0 FTE</u>
<u>Every additional 300 EL students</u>	<u>+1.0 FTE</u>

The Union’s current proposal is that the stipend schedule that exists under the expired CBA be replaced with a commitment that any ELPT with 200 or more students on their caseload receive a stipend of \$2,500.

The stipend structure is an existing component of ELPTs compensation package. While the Union is glad for the significant progress made on reducing the ELPT-to-ELL allocation ratios, which will benefit ELL students immensely, it should not come at the expense of diminishing ELPTs’ compensation package. The Union recognizes the improvement to the ratio may warrant an adjustment to the stipend eligibility criteria. Hence, the Union has made its current proposal, which does just that, but also recognizes the increased workload for ELPTs with caseloads on the high ends of the allocation formula so as not to eliminate and existing

benefit. Based upon school-to-school ELL distribution data, the Union estimates this proposal would cost the Board less than \$400,000.

Given the history of the stipend, the moderation of the Union's proposal, and the wide ranges on the caseload allocation bands, the fact-finding panel should recommend the Union's proposal and it should be adopted by the parties.

### **3. Teacher Evaluation**

In 2010, the portions of the Illinois School Code governing teacher evaluation were amended via the Performance Evaluation Reform Act (known as "PERA"). In 2012, CPS implemented a new teacher evaluation system, known as "Recognizing Educators Advancing Chicago Students" or "REACH". The underlying state law requiring the new system was pushed through the General Assembly in a rush in 2010 in anticipation of federal Race to the Top funds. The teacher evaluation mandates incorporated therein were developed and promoted by funders like the Bill and Melinda Gates Foundation and The New Teacher Project, who claimed the main problem facing public education was that most teachers had inflated evaluation ratings.

In the ensuing decade, PERA, and REACH, have proven to be an abysmal failure that has frustrated teacher recruitment, development, and retention, and student achievement, in myriad ways. The experience of the last 12 years under REACH has shown what teachers knew to be true all along: teachers' evaluations were not inflated, and poor educational outcomes are mostly due to poverty and racism.

The two well-documented core problems with REACH are that (1) it has had devastating disparate racial impact, and (2) it is self-defeatingly cumbersome for both teachers and school administrators.

- a. Independent studies have found that PERA and REACH have had significant disparate harmful impact on teachers of color

The most concerning aspect of PERA and REACH are the repeated independent findings that they have had disparate harmful impacts on teachers of color, and on teachers working in schools serving predominantly Black and Latinx students and in schools serving the highest proportions of low-income students.

Most recently, in June of 2024, an Illinois State Board of Education report made the following findings concerning REACH:

Black or African American and Hispanic or Latinx teachers consistently received lower ratings than White teachers, regardless of whether they had 1 year, 2–3 years, 4–5 years, or 6 or more years of teaching experience [...]

The distribution of evaluation ratings also differed by school and district characteristics. In schools with the highest (4th quartile) proportions of low-income students, a lower percentage of teachers (26.3%) received an “Excellent” rating compared to teachers (55.4%) in schools serving the lowest (1st quartile) proportions of low-income students. In districts with the highest (4th quartile) proportions of White teachers, a higher percentage of teachers (57.7%) received ratings of “Excellent” than did teachers (38.0%) in districts with the lowest (1st quartile) proportions of White teachers. During interviews and focus groups, an early contributor to PERA and a member of a joint committee raised concerns about the current evaluation system’s ability to measure performance reliably and fairly, particularly for Black or African American and Hispanic or Latinx teachers in schools serving low-income communities. These participants suggested that the system does not adequately account for systemic barriers that may adversely impact the evaluations of Black or African American and Hispanic or Latinx educators serving at-risk populations.”<sup>103</sup>

CPS data also shows the following:

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<sup>103</sup> See <https://www.isbe.net/Documents/AIR-ISBE-Final-Report.pdf>. See also the 2016 University of Chicago report, finding that under PERA “on average, Black, Latino, and other minority (i.e. Asian, Hawaiian/Pacific Islander, Native American, and multi-racial), teachers’ observations scores are lower than white teachers’ observations scores.” <https://consortium.uchicago.edu/sites/default/files/2018-10/Teacher%20Evaluation%20in%20Chicago-Jan2016-Consortium.pdf>; and a 2020 American Educational Research Association study finding that REACH “may penalize Black teachers” <https://www.aera.net/Newsroom/What-Explains-the-Race-Gap-in-Teacher-Performance-Ratings-Evidence-from-Chicago-Public-Schools>.)

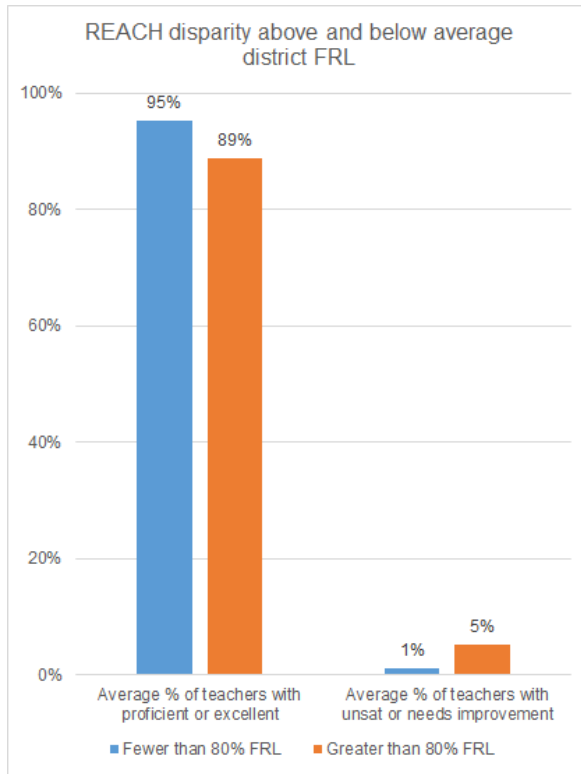


- Since 2012, when REACH was first implemented in CPS, the percentage of Black CPS teachers has dropped from 30% to 20.6%.
- The greatest predictor of the average evaluation scores for teachers in a school building is the zip code in which the school building lies and the zip codes in which its students live.
- Tenured Black teachers receive the same scores, on average, as white probationary appointed teachers (“PATs” – early career teachers who are not yet tenured).
- Black PATs are 3 times as likely to get an unsatisfactory ratings as a white PAT
- Tenured black teachers are rated as unsatisfactory three times as often as tenured white teachers.
- Black tenured teachers are rated unsatisfactory or excellent at similar rates as untenured White teachers.
- Untenured white teachers are rated as excellent three times as often as untenured Black teachers.

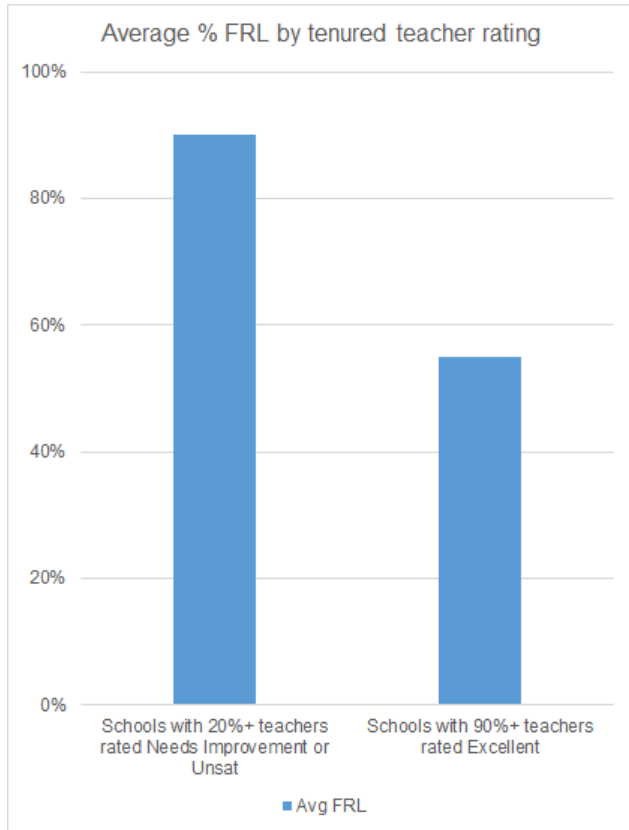
<b>Tenured</b>	<b>Unsatisfactory</b>	<b>Needs Improvement</b>	<b>Proficient</b>	<b>Excellent</b>
Black	0.3%	5.4%	64.8%	29.5%
White	0.1%	1.4%	37.0%	61.6%

<b>Untenured</b>	<b>Unsatisfactory</b>	<b>Needs Improvement</b>	<b>Proficient</b>	<b>Excellent</b>
Black	1.0%	13.1%	75.0%	10.9%
White	0.4%	6.6%	62.1%	30.9%

- Tenured teachers are five times as likely to be rated an unsatisfactory or needs improvement if they worked in a school with above average rates of students qualifying for Free or Reduced Lunch



- There is a stark contrast in the number of students qualifying for Free and Reduced Lunch between schools where tenured teachers are overwhelmingly rated as Excellent and where a substantial percentage fall in the bottom two categories.



- In 2022, Black PATs were non-renewed at a rate of 4.3%, 80% greater than the 2.4% non-renewal rate for white PATs
- In 2023, Black PATs were non-renewed at a rate of 3.4%, 80% greater than the 1.9% non-renewal rate for white PATs

To address these racial inequities, the Union has two primary proposals. First, the Union proposes that the Board and Union agree to jointly advocate the Illinois General Assembly for the repeal of PERA due to the issues noted in the ISBE report cited *supra*, and to allow the parties to negotiate a mutually agreeable replacement evaluation system to REACH that focuses on teacher development, support, and growth, and seeks to address the disparate racial impact REACH has had. In the interim, the parties would follow the current statutory requirements for

teacher evaluation, as reflected in the CBA, until PERA is repealed and a replacement teacher evaluation system is agreed upon.

Second, the Union has proposed that teachers at schools serving the highest risk communities as measured by the CPS Opportunity Index <sup>104</sup> trending toward ratings below proficient be offered the opportunity to access mentoring, including through the We Care Program, and be provided additional rights to appeal their ratings, and that the CTU/CPS Joint Evaluation Committee modify its best practices recommendation guidance to administrators to include mechanisms by which to take into account racial bias and community disadvantage.

b. REACH is cumbersome and time-consuming to the point of being self-defeating.

REACH is extremely time-consuming and burdensome on both teachers and principals. An effective teacher evaluation system is focused on mentoring, coaching, feedback, and professional growth. REACH takes time away from all of those things by way of observation, pre- and post-observation conference schedules and rubrics that are rigid, formulaic, and lengthy.

REACH is so burdensome, in fact, that during the 2023-24 school year, over 7,200 teachers – more than 1 out of every 3 teachers in the school district, did not receive the required number of teacher observations last year and consequently received a default rating.<sup>105</sup>

This data shows that CPS principals and assistant principals have, in large part, are unable to implement REACH.

In view of these facts, in 2021, the Illinois General Assembly amended the Illinois School Code via HB18 to provide that school districts could adopt teacher evaluation plans under which tenured teachers rated proficient or excellent receive summative evaluation ratings once every

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<sup>104</sup> See <https://www.cps.edu/sites/equity/cps-opportunity-index/>

<sup>105</sup> See district data here: <https://drive.google.com/file/d/1Jmx-ihYcDd5900RRkp3ChpoxTSYmSR35/view?usp=sharing>.

three school years. (The law had previously required – and the 2019-2024 CTU-CPS CBA requires – tenured teachers rated proficient or excellent to receive summative ratings once every 2 years. Tenured teachers rated below proficient and all probationary appointed teachers are required to receive summative evaluation ratings every year.)<sup>106</sup>

Despite this amendment becoming effective in 2022, and despite the Union’s urging, CPS never adopted this change, and to this point has refused to accept the Union’s proposal that tenured teachers rated proficient or higher be moved to 3-year evaluation cycles, as permitted by the state law. The data and research shows that doing so would free up principals and assistant principals to actually complete more evaluations and focus their attention on teachers in need of the most support (due being able to spend less time evaluating experienced, tenured, consistently high-performing teachers).

The Union’s proposals on evaluation are overwhelmingly supported by independent research and should be recommended by the panel and adopted by the parties.

#### **4. Teacher Preparation Time, Professional Development and Elementary School Day**

The Union has proposed to restructure the elementary school day to provide more robust enrichment programming for students, and greater collaboration time for educators to ensure student needs are being met. Teachers spend countless uncompensated hours working outside of their contractual work day preparing instructional materials and lessons, grading student work, communicating with parents, administration, and colleagues, and completing the myriad

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<sup>106</sup> See 105 ILCS 5/24A-5, and <https://www.ilga.gov/legislation/BillStatus.asp?DocNum=18&GAID=16&DocTypeID=HB&LegId=127828&SessionID=110&GA=102#:~:text=Amends%20the%20Chicago%20School%20District,or%20%22proficient%22%20is%20evaluated%20at.>

paperwork demands placed upon them. The development and delivery of rigorous instruction depends upon good preparation, and the amount of time provided for it during teachers' work days at present is inadequate.

The Union has proposed to increase the amount of self-directed preparation time an elementary school teacher receives during the work day from two-hundred and forty (240) minutes per week to three hundred and forty (340) minutes per week which would allow for at least twenty (20) minutes in the morning for teachers to prepare for the day before welcoming students. Under CPS's current and proposed schedule, elementary school teachers are required to begin the school day with their students, so to be adequately prepared for the day they must arrive prior to their work day without receiving any additional compensation.

A 2012 study by University of Illinois Professors Robert Bruno and Steven Ashby quantified the amount of work CPS teachers expend on behalf of their students.<sup>107</sup> Professors Bruno and Ashby found, amongst other things, that

- Teachers on average work 58 hours per week during the school year.
- The work of a teacher happens before, during, and after the school bell rings.
- Teachers on average work a 10 hour and 48-minute standard school day.
- Teachers are at school on average for almost nine hours per day.
- A typical teacher spends almost 2 hours more working at home in the evening.
- Teachers carve out another 3 hours and 45 minutes to do school-related work each weekend.
- A teacher's role goes beyond merely instructing in the classroom. Teachers spend just over 3 hours each day performing non-teaching related activities.

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<sup>107</sup> *Beyond the Classroom, An Analysis of a Chicago Public School Teacher's Actual Workday*; Robert Bruno and Steven Ashby (2012), <https://news.illinois.edu/view/6367/252020>.

Since the University of Illinois study, CPS teachers' "official" work day has increased, from 375 to 420 minutes at the elementary school level and from 420 to 435 minutes at the high school level. Additionally, in the intervening time, CPS has propounded a litany of additional grading, student assessment, and paperwork tasks that teachers are required to complete. In combination, the extended work day and increased non-instructional duties have left teachers with even less time to complete the instructional preparation work critical to effective teaching.

All CPS Charter Schools offer more preparation time for elementary school teachers than what is currently being offered by CPS. Notably, Acreo Elementary School teachers get at least three-hundred and thirty (330) minutes of preparation time <sup>108</sup> per week and Passages charter school teachers get three hundred and seventy-five (375) minutes of preparation time per week.<sup>109</sup> Providing CPS Elementary School teachers with this additional preparation time will still allow schools to meet the district mandated instructional minutes and will also allow teachers to meet students' social and emotional needs and develop an engaging curriculum that is catered more fully to their students. The Union's proposal despite claims<sup>110</sup>, would actually increase instruction for students unlike the Board's Assessment proposal (discussed more fully below) which would actually take away from instruction in favor of more standardized testing of students.

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<sup>108</sup> See <https://www.ctulocal1.org/wp-content/uploads/2024/04/Acero-CTU-CBA-22-26-Final-with-signatures.pdf>

<sup>109</sup> See <https://www.ctulocal1.org/wp-content/uploads/2024/04/Passages-CTU-CBA-Final-with-signatures.pdf>

<sup>110</sup> See <https://www.wbez.org/education/2025/01/12/ctu-contract-talks-remain-stuck-on-what-goes-on-in-schools-not-on-economics>

## 5. PSRP Issues

The CTU has made a number of proposals concerning the working conditions of PSRPs—the non-teaching, educational support personnel positions within the CTU bargaining unit whose work is critical to well-functioning schools. Amongst other things, the Union has proposed that the Board provide probationary PSRP with notice and an opportunity to respond to allegations levied against them before they are terminated and designated as ineligible for rehire, which is the same process that probationary teachers receive. The Union has also proposed that PSRPs be afforded other rights afforded to teachers such as the (1) creation of a salary lane for PSRPs whose positions prefer a Master’s degree, (2) having the same break in service and unused sick day reporting rules that teachers have, and (3) not docking PSRP pay for being late but addressing this issue through the employee discipline process. Finally, the Union is proposing that, by the 2027-28 school year, the Board employ an additional 700-800 centrally funded teacher assistants across the district, and 40 additional bilingual teacher assistants.

From 2012 to 2018, 754 PSRPs lost their jobs. This is a decline of 20 percent in the number of PSRP position titles in the Union’s bargaining unit,<sup>111</sup> which far outpaces the loss of teacher positions. More than a quarter of all teacher assistants were laid off or reclassified between 2012 and 2017.<sup>112</sup> School clerk positions were cut by 22 percent between 2012 and 2017.<sup>113</sup> The cuts to these positions have occurred at a rate much greater than the decline in enrollment in the school district, and leave principals and teachers ill-equipped to handle the

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<sup>111</sup> See CPS Position Files: [https://cps.edu/About\\_CPS/Financial\\_information/Pages/EmployeePositionFiles.aspx](https://cps.edu/About_CPS/Financial_information/Pages/EmployeePositionFiles.aspx)

<sup>112</sup> *Id.*

<sup>113</sup> *Id.*



myriad operations, support, and administrative tasks that are part-and-parcel to well-functioning schools.

At the end of the 2023-2024 school year CPS laid off 595 PSRPs, over half of which were Teacher Assistants. This represents 15% of all CTU PSRP positions in the district. Even though most of these members were reassigned to other positions within the district and/or placed in the “layoff prevention pool” CPS established for laid off teachers assistants, this summer shuffling of staff disrupts key relationships PSRPs build with student and families<sup>114</sup>. The Union has proposed that CPS maintain this layoff prevention pool but extend it to all PSRP positions going forward, which is similar to that established for teachers, to provide for stability for these employees to avoid the loss in talent, knowledge and dedication to the students of Chicago. The uncertainty PSRPs feel after repeated layoffs not only make these dedicated employees feel disposable but does not show the respect the district claims to have for their employees.<sup>115</sup>

For schools to function as they should, CPS needs to drastically increase PSRP staffing levels and retain the talent that is already within the district by establishing a PSRP retention pool.

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<sup>114</sup> [Hyde Park Herald Article: https://www.hpherald.com/evening\\_digest/chicago-public-schools-announces-safeguards-for-laid-off-employees-as-teachers-union-decries-staff-cuts/article\\_e3ee39f6-3801-11ef-9f3e-37c67dc6a1cb.html#:~:text=Potter%20and%20educators%20who%20addressed,ward%20off%20support%20staff%20layoffs.](https://www.hpherald.com/evening_digest/chicago-public-schools-announces-safeguards-for-laid-off-employees-as-teachers-union-decries-staff-cuts/article_e3ee39f6-3801-11ef-9f3e-37c67dc6a1cb.html#:~:text=Potter%20and%20educators%20who%20addressed,ward%20off%20support%20staff%20layoffs.)

<sup>115</sup> Id.

## **6. Early Childhood Education**

The Union has proposed a number of measures concerning early childhood education, including hiring additional Family Engagement Coordinators – a position created after CPS abruptly eliminated the Head Start Program Resource Assistant (PRA) position title in the Spring of 2018, terminating the 34 employees in that position title. These PRAs were overwhelmingly women of color, and had amongst other things been tasked with enrolling early childhood program students and supporting parents and students throughout the CPS enrollment process for years. In their place, CPS advised that “principal-designated staff” would perform the work formerly done by the PRAs of connecting students and families with social services. CPS also created the Family Engagement Coordinator (“FEC”) position at the Network to oversee and assist in the completion of this work, as the principal-designated staff at the schools had other full-time job responsibilities (school clerks, teachers, counselors) and did not have the accumulated network of resources and contacts of the PRAs to fully assist families. To date, there are only eighteen (18) FECs attempting to complete the work previously done by 34 PRAs, while also being responsible for being the “bridge” between the network and the school level staff handling this work. The Union is proposing that two FECs be hired each year of the agreement to bring that number to a total of 26 employees. This will allow for there to be at least two FECs at each network office. Currently, there are only four (4) networks with two FECs assigned. This Union believes this proposal is more than reasonable when the size of the district and the number of employees that have historically performed this work is considered.

The Union is also proposing to alter the school calendar to allow kindergarten students to start one day later and end the school year one day earlier. CPS has agreed to alter the calendar in this manner for pre-k students but continues to reject this proposal for kindergarten students. The

Union believes this is a reasonable position considering that many of the same reasons for allowing an alteration of the calendar for pre-k students currently exists for kindergarten students (i.e. allowing for new parents to meet teachers, allow students more time to transition into the school because it is their first time in school, allowing teachers more time to prepare, etc.) CPS announced plans to provide “universal pre-K” by 2021, and toward that end, to open more than 100 new full-day pre-K classrooms in the 2019-20 school year.<sup>116</sup>

The Union applauded these goals to expand early childhood education, but CPS needs to hire an adequate number of pre-K teachers, teacher assistants, and support staff to make this expansion successful. The Union understands it is CPS’s intention to open more pre-k programs throughout the district that will hopefully allow for more pre-k students to attend and remain in the same school for kindergarten. But that is not the case at present, so an alteration of the calendar for pre-K and Kindergarten would be appropriate.

Moreover, the Union is proposing that CPS allow for no more than 18 students in half day pre-k classrooms to make the workload of these half day teachers more manageable and more comparable to their full day counterparts. The Illinois State Board of Education mandates a 1:10 staff-to-child ratio in pre-K classrooms, as well as a limit of 20 children per pre-K classroom.<sup>117</sup> Thus, the Union believes this is a reasonable proposal and that fact-finding panel should recommend, and the parties should adopt, the Union’s proposals on this issue.

Lastly the Union is proposing training and a stipend for early childhood educators who elect to be a school’s “toileting designee” to assist non-IEP students with toileting accidents.

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<sup>116</sup> See [https://cps.edu/News/Press\\_releases/Pages/PR1\\_03\\_22\\_2019.aspx](https://cps.edu/News/Press_releases/Pages/PR1_03_22_2019.aspx).

<sup>117</sup> See [https://www.isbe.net/Documents/Preschool\\_for\\_All\\_Implementation\\_Manual.pdf](https://www.isbe.net/Documents/Preschool_for_All_Implementation_Manual.pdf) at p. 7.

CPS has rejected providing more preparation time for shared planning between teachers and PSRPs as well as any toileting designee stipend to assist in toileting incidents that happen within the school day. The solution that CPS has proposed for toileting accidents is to have the child wait until a parent or guardian comes to assist or have a staff member talk a child through how to clean and change their clothing themselves after an incident. Neither of the suggestions offered by CPS are workable to the realities of what happens when a child has a toileting accident nor do they provide a real solution for how schools can appropriately deal with this problem. CPS's "solutions" do not take into account that toileting accidents can be very embarrassing and traumatizing for students and dealing with these issues in the way CPS suggests takes educators away from instruction. If CPS truly cares about students and preserving instructional time the fact-finding panel should recommend, and the parties should adopt, the Union's proposals on this issue.

## **7. Sports**

The Board has historically woefully underfunded athletics within CPS, especially in comparison to other school districts in the Chicagoland areas with whom CPS student-athletes compete. In 2019, the Board spent approximately \$15 million per year on sports across the 500+ district-run CPS schools. At the conclusion of the 2019 CTU strike, CPS agreed to increase that amount by \$5 million per year across the term of the 2019-24 CBA, for transportation, equipment, uniforms, supplies, and greater equity in compensation for coaches.

The parties have come a long way toward an agreement that will provide \$10 million per year for equipment, uniforms, supplies, and transportation for CPS sports programs, substantially increase coaching stipend pay to become more on par with suburban school districts, and expand

sports opportunities for students through joint Board Union advocacy to professional sports organizations for funding and strategic partnerships toward a CPS sports equity fund, ensuring distribution of resources to schools with the greatest need.

While the parties are close to an agreement on a new coaches stipend schedule to become effective in the 2025-26 school year, CPS has yet to agree that coaches will minimally receive the same compensation, plus the cost of living adjustment for SY2024-25 as they did for SY2023-24, and has yet to make a proposal on compensation for stipended high school athletic directors and elementary school athletic directors (known as elementary school sports liaisons). The fact-finding panel should recommend, and the parties should adopt, the Union's proposals on those issues.

## **8. Clinicians and Counselors**

Chicago students are dealing with historic and disproportionate levels of trauma due to, amongst other things, generational disinvestment in their communities, the shuttering of mental health services formerly provided by the City and State, and recovery from the Covid-19 pandemic. Due to the advances secured in the 2019 CBA, the school district has made significant improvements in clinician staffing over the last 5 years. But staffing levels still lag behind recommended ratios, caseloads remain too high, and the working conditions for the educators in these positions remain difficult. The Union has made a number of proposals to address these problems, all with the aim of moving the school district toward compliance ratios recommended by the National Association of Social Workers, the National Association of School Nurses, and the American School Counselor Association, detailed in the staffing section above.

Additionally, the Union has proposed, amongst other things:

- Guarantees that safe and appropriate workspace be provided to clinicians visiting schools to provide services to students;
- Access to parking for clinicians and itinerant teachers who travel between multiple schools to serve different students;
- Manageable caseload and workload formulas that ensure students with disabilities are receiving the services to which they are legally entitled; and
- Fair compensation through appropriate lane placement corresponding with credit hours required for specialized clinician master's degrees and recognition of national board certification in their professional disciplines.

The Union's proposals for clinicians and counselors are reasonable, in line with state and national recommendations, in many cases necessary to bring CPS in compliance with state law, and should be recommended by the fact-finding panel and adopted by the parties.

## **9. Guest Teachers**

As discussed *infra*, class coverage has become an endemic problem across CPS, due in no small part to the substitute teacher shortage. This problem is particularly acute on the south and west sides of the city, in some of the most under-resourced schools, and is aggravated by the particularly difficult working conditions substitute teachers often encounter. The coverage issues have improved slightly, in no small part due to the incentives CTU negotiated to encourage substitutes accepting assignments at hard to staff schools but there is more than can and needs to be done.

The Union has proposed a number of measures to continue to address these problems, including bargaining over changes to the substitute handbook; allowing cadre substitutes three (3) personal business days; additional compensation for experienced guest teachers; payment for missed preparation periods that are guaranteed to guest teachers; payment for canceled assignments; and payment for mandatory trainings they must complete. CPS has rejected all of these proposals without offering an alternative. The Union believes these measures are necessary to attract and retain a qualified pool of substitute teachers who feel valued and respected. The fact-finding panel should recommend, and the parties should adopt, the Union's proposals on those issues.

#### **10. Class Size**

Decades of research shows that small class sizes are critical to quality education. The Union has proposed enforceable class size limits tied to grade levels and subject matters. The Union has also proposed, amongst other things, that for classes exceeding the contractual class size limits, there be automatic relief and regular monitoring; and that 4th-8th grade classes and high school enrichment courses such as (Art, Music, Physical Education, etc) have a class size maximum of twenty-eight (28) students. CPS is proposing a 4th-8th class maximum of thirty (30) students and high school enrichment courses maximums of thirty-one (31) students. There is broad and deep consensus about the educational benefits students receive from small class sizes.<sup>118</sup>

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<sup>118</sup> See, for example Thomas Dee and Martin West, "The Non-Cognitive Returns to Class Size", National Bureau of Economic Research, May 2008, available at <https://www.nber.org/papers/w13994.pdf>.

In the 2017-18 school year, 19% of elementary school classrooms had more than the already large, CPS-imposed limit of 29 in K-3 (and 32 in grades 4-8). This is 1,434 classrooms. 13% of high school classes were over the already large high school class size limit. CPS has the highest class sizes across grades 1-4 of any school district in the entire Chicago metropolitan area. Statewide, the average class size in K-3 classrooms is 19.5 students.<sup>119</sup>

Contractually enforceable class size limits are a growing trend in Chicago. Several CPS charter and contract school operators have agreed enforceable class size limits. Those charter and contract schools include the Acero Network of Charter Schools, Civitas/CICS Charter Schools, ASPIRA Charter Schools, the Chicago High School for the Arts, and Instituto Health and Sciences Career Academy.

Many CPS students begin their education with enough built-in disadvantages as it is. CPS should not add being denied the benefits of small class sizes to the list. The fact-finding panel should recommend, and the parties should adopt, the Union's proposals on those issues.

### **11. School Closings and Charter Schools (Side Letters)**

The Union has proposed continuation of existing side letters, with modifications, concerning school closings and charter schools. The Union has proposed, amongst other things, that the Board continue to observe a moratorium on closures of district-managed schools, the establishment of new charter schools, a requirement that all charter and contract schools spend no less than 90% of their budgets on direct-service spending on students, and adoption of clear transition procedures for charter and contract school closures and reabsorption.

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<sup>119</sup> See <https://www.isbe.net/Documents/2018-State-Report.pdf> at p. 2.



Since 2002, CPS has closed or reconstituted approximately 200 schools, impacting 70,160 children.<sup>120</sup> 61,420 of those children are Black.<sup>121</sup> In that same time period, CPS has opened almost as many new schools – 193.<sup>122</sup> This has been a massive and costly educational experiment, and the negative results have far outweighed the positive ones.<sup>123</sup> School closings have torn communities apart, and have been a driving factor in Chicago’s population decline and the decline in the school district’s enrollment.

CPS must now focus on stability and supporting existing schools and the students and teachers in them. For all these reasons and more, CPS should agree to establish a moratorium on school closings and charter expansion, and focus on providing adequate support and resources to students, parents and teachers.

## **12. Duration**

The Union has proposed a four-year agreement, from July 1, 2024 to May 1, 2028. CPS has proposed a four-year agreement with the term ending on July 1, 2028 to align with the fiscal year. Given that the budget for fiscal year 2028 is set on July 1, 2027 and is paid through July 1, 2028, there would be no impact on CPS’s budget to have the contract expire on May 1, 2028. However, having the contract expire earlier does have the benefit of giving the parties an opportunity to begin negotiations sooner and possibly set a successor agreement prior to the beginning of the next fiscal year. Thus, the Union believes that having an earlier expiration date

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<sup>120</sup> See <https://interactive.wbez.org/generation-school-closings/>

<sup>121</sup> Id.

<sup>122</sup> Id.

<sup>123</sup> See <https://consortium.uchicago.edu/publications/school-closings-chicago-staff-and-student-experiences-and-academic-outcomes>

of May 1st is appropriate. The fact-finding panel should recommend, and the parties should adopt, the Union's proposals on this issue.

### **13. Assessments (CPS Issue Submission) (Article 44-32)**

In the last 20 years, the number of standardized tests American K-12 students have to take during their academic careers has skyrocketed. Testing has become big business, and school districts began to structure their entire educational models toward achieving desired results on standardized tests. This “teaching to the test” mindset concomitantly has taken the joy and spontaneity out of teaching and learning, constricted student exposure to a wide range of areas of study, diminished teachers’ professional and pedagogic autonomy, and taken instructional time away from topics that are not prized by the assessment industrial complex - including art, music, theater, library studies, physical education, and other enrichment courses.

In the 2015-2019 CBA, the parties agreed to a process to at least temper this trend by which the faculty at schools would determine by a voting process what standardized tests, beyond those required by law and school district policy, would be administered at their schools. CPS. CPS currently has an assessment calendar that, just for elementary school students, has 32 standardized tests on it for one school year – 15 of which are noted as required.<sup>124</sup>

The Board is proposing to expand the number of required tests. The Union is proposing to clarify the process by which faculty votes on additional tests take place. The fact-finding panel should recommend, and the parties should adopt, the Union's proposal.

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<sup>124</sup> See [SY25 CPS Assessment Calendar](https://docs.google.com/document/d/15fvNZ_g3S_i8_5QtUpndhU5bGs7MT-1t003UPpoEvyA/view?tab=t.0)  
[https://docs.google.com/document/d/15fvNZ\\_g3S\\_i8\\_5QtUpndhU5bGs7MT-1t003UPpoEvyA/view?tab=t.0](https://docs.google.com/document/d/15fvNZ_g3S_i8_5QtUpndhU5bGs7MT-1t003UPpoEvyA/view?tab=t.0)

#### **14. Grievance and Arbitration Process Changes (CPS Issue Submission)**

The CTU's bargaining unit includes over 30,000 employees across 514 schools and dozens of position titles. Typically, between 500 and 1,000 grievances are filed in a given school year. While many of these grievances are resolved at the early steps of the grievance procedure, often between 100 and 200 demands for arbitration are filed per year. While the Union agrees many cases are best resolved through the parties' contractual grievance arbitration procedure-- particularly those involving sizable amounts of money in controversy or contract interpretation disputes with system-wide impact – traditional grievance arbitration is time-consuming and expensive for both parties. As such, sizeable backlogs of unresolved grievances frequently develop, damaging the parties' collective bargaining relationship and harming employee morale.

To address this, the Union has proposed that the parties adopt an additional process for grievance resolution in the contract – expedited mediation-arbitration (known as “med-arb”). Since 2012, the parties have adopted a med-arb process for certain discipline cases.<sup>125</sup> This has resulted in more efficient resolution of disputes over employee discipline, and fewer dismissal cases developing due to a focus, facilitated in med-arb, on corrective, performance-improving discipline, as opposed to punitive discipline. The Union's proposal for contract grievance med-arb is modeled to operate identically to the successful discipline med/arb process the parties have had in place for the last 12 years.

Under the Union's current proposal, to address Board concerns, med/arb cases would be limited to a maximum of 3 per month, decisions would be non-precedential, cases with system-wide implications would not be eligible, and the amount in controversy in a given case could be

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<sup>125</sup> See Articles 29-4 and 29-5 at p. 136 of the 2019-24 CBA, <https://www.ctulocal1.org/wp-content/uploads/2023/01/CPS-CBA-2019-24.pdf>.

no more than \$35,000. The parties have had grievance mediation provisions in the CBA for many years, but it has not been used in over 10 years because it is optional and the Board invariably refuses the Union's requests for mediation of grievances and insists upon arbitration. This demonstrates the need for the structure of the Union's proposal.

Grievance med/arb, as proposed by the Union, would substantially improve the parties bargaining relationship, leading to expedited, and hopefully frequently agreed-upon, resolutions to grievance disputes. For all of these reasons, the fact-finding panel should recommend and the parties should adopt the Union's proposal.

#### **15. Mid-year Transfer Window (CPS Issue Submission)**

For decades, the CTU/CPS CBA has provided for teacher transfer periods – periods of time in the calendar year during which teachers can transfer from one school to another. This is codified at Article 35-4 of the 2019-2024 CBA, which provides as follows:

35-4. Teacher Transfer Periods. Teachers may transfer effective the second semester of the school year without the consent of their current principal only when the Talent Office receives the administrative transfer request signed by the receiving principal between seventy-five and thirty calendar days prior to the conclusion of the first semester of the school year. Teachers may transfer effective the end of the school year without the consent of their current principal only when the Talent Office receives the administrative transfer request signed by the receiving principal between seventy-five and thirty calendar days prior to the conclusion of the school year.

The Board has proposed to eliminate the mid-year teacher transfer window. The Board argues that mid-year transfers (a) cause disruption for schools and students, and (b) often involve teachers transferring from schools in high-needs communities to better resourced schools. The Union is sympathetic to those concerns, and has made a host of proposals to address inequity within the school district across a long list of topics.

As discussed earlier in this brief, under the school district's teacher evaluation system, teachers in high-needs schools, on average, receive lower evaluation ratings, threatening their job security. Bullying from school administrators, unfortunately, has also been a common problem faced by CPS teachers, as evidenced by the parties' addition of a respectful working environment provision to the CBA in 2012 at Article 44-25. It is also difficult to teach in a school that is understaffed, and has fewer enrichment opportunities for students.

In the Union's view, the school district would do much better to address the inequity and instability it cites in support of its proposal here by putting resources and effort into solving the problems of a broken teacher evaluation system, bully administrators, and understaffing than to attempt to take away teachers' longstanding transfer rights.

The fact-finding panel should recommend and the parties should adopt maintenance of the status quo concerning teacher transfer periods.

