



State of Arizona
Department of Education

Tom Horne
Superintendent of
Public Instruction

January 13, 2009

Kerri L. Briggs, Ph.D.
Assistant Secretary
Office of Elementary and Secondary Education
United States Department of Education
400 Maryland Avenue S.W.
Washington, D.C. 20202

Dear Dr. Briggs:

The Arizona Department of Education (ADE) respectfully submits this letter requesting an amendment to the state of Arizona's accountability plan.

NCLB recognizes that there are often system-wide challenges that need attention. In responding to these challenges, states must balance a need for overall student improvement with a corresponding need to set priorities among the school districts most in need of improvement. The United States Department of Education has given flexibility to states to use a common sense and reasonable approach towards achieving that balance, and it is in this vein that the Arizona Department of Education proposes the following amendment to the state's LEA improvement accountability plan.

Arizona proposes to adjust how an LEA identified for improvement may exit from improvement status. Currently, a district is identified for improvement when it does not make AYP in the same subject/indicator across each grade span for two consecutive years. When an LEA makes AYP for two consecutive years it exits LEA improvement status.

Arizona proposes that after an LEA is identified for improvement and then makes AYP in the same subject/indicator and across each grade span for two consecutive years, ***but in that second year misses AYP for the first time in another indicator***, the district will be placed on a 'Watch List' rather than retain its current improvement status or move further into the improvement process with a more stringent label.

An LEA would be better served being placed on a Watch List than receiving a more severe Improvement label in the example given above. Moving deeper into the LEA Improvement process would not be an accurate reflection of the LEA's previous two year AYP accomplishments. When an

LEA systemically attends to and corrects the AYP issue that qualified it for LEA Improvement, then the LEA should be able to shed that improvement label if, in the second year of successfully attending to the AYP issue, student performance in a different subject/indicator becomes a distinct AYP issue. Furthermore, the LEA status should be reflective of its gains as well as its needed correction. Being placed on a Watch List for the new AYP issue would more accurately reflect its achievement and at the same time, under the "Watch List" label, the LEA could not abdicate its obligations in rectifying the new AYP issue.

Attached is a document with examples of how the proposed amendment will work.

Please feel free to contact me for additional explanation, clarification, or supporting material.

Sincerely,

Robert Franciosi
Deputy Associate Superintendent
Research and Evaluation
Arizona Department of Education

/attachments