



State of Arizona  
Department of Education

Tom Horne  
Superintendent of  
Public Instruction

February 5, 2008

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

Dear Dr. Briggs:

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

The requested amendments are:

- 1. Administration of the science assessment.** Arizona will be giving the AIMS Science in grades four, eight, and high school for the first time April 2008. The AIMS Science test is aligned to the Arizona Academic Science Standard that was adopted by the state board in 2004. The process development and adoption of the science standard and the performance level descriptors were part of the peer review completed July 2006. Standard setting to establish the achievement standards for science will be held in June 2008. Scores will be reported to students and schools in August 2008. High school students enrolled in a course covering strands 1-4 will test in ninth or tenth grade on those strands. Ninth grade scores will be banked for reporting the following year. Students in grades four and eight are assessed on their grade level content standards. Arizona expects to submit the AIMS science assessment for peer review in the fall of 2008.
- 2. AYP determinations for K-2 schools.** The current, approved method for evaluating AYP of a K-2 school is based on the performance of its former students on the third grade AIMS in the following year. We are requesting to modify the evaluation so that AYP for a K-2 school would be based on the AYP determination of the third grade of a designated school to which a plurality of the students of the K-2 school matriculate.

This change will not substantively affect the AYP evaluations for these schools. Most of the 20-odd K-2 schools in Arizona are in isolated rural districts where students move on to a single, easily

identified school. The essential impact of this proposed change is to remove from the evaluation students who move outside the district of the K-2 school. Closely linking the performance of the K-2 school to a clearly identified, single school within the same district makes it easier for principals to collaborate to develop improvement plans and increase student achievement.

- 3. Identification of schools and LEAs for improvement.** Arizona proposes to adjust the definition of the subject indicators. Currently, the subject indicators used for determining advancement within school and LEA Improvement encompass both AMOs and percent tested objectives. It is proposed for the indicators to become more sensitive to school and LEA persistent difficulties and to distinguish subject AMOs and overall percent tested separately. This would result in Arizona using four indicators to identify schools for improvement: 1) Reading AMO, 2) Mathematics AMO, 3) percent tested, and 4) the additional indicator. In this proposed system, the percent tested indicator would include both reading and mathematics percent tested objectives.

*Rationale*

The current system provides subject indicators that are overly broad and occasionally confusing. This has led to frustration for many educators who work diligently to address deficiencies but believe that efforts are sometimes unrecognized. For example, consider a school that has missed its reading AMO objective and is identified for improvement. This school then develops a strong plan that improves reading comprehension for students. Achievement results the following year provide evidence of the school’s efforts when the reading AMO is met. However, if the school only has 94 percent of students complete the reading assessment, under current guidelines, the school would advance in the school improvement system because it missed the reading indicator. If the proposed modification is accepted, this same school would remain in school improvement, but not advance. If the following year, this same school were to miss percent tested again in mathematics or reading, the school would advance to the next level of school improvement.

Moreover, schools and LEAs that are plagued with percent tested issues can address deficiencies with the same strategies whether the failings manifest as percent tested in reading or percent tested in mathematics deficiencies. More often than not, percent tested deficiencies in reading are replicated in mathematics, thus providing further substantiation to the proposal to combine these objectives into one percent tested indicator.

Examples 1 through 4 indicate current pathways of advancing in school and LEA improvement that would no longer apply if the proposed modification is accepted. If approved, in all of these cases the school or LEA would miss AYP in both Year 1 and Year 2 but would remain at the same improvement level. In these examples, an “X” indicates an objective has been missed.

*Example 1*

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1		X		
Year 2	X			

*Example 2*

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1	X			
Year 2		X		

*Example 3*

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1				X
Year 2			X	

*Example 4*

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1			X	
Year 2				X

Examples 5 and 6 indicate two new ways that a school or LEA could advance if the proposed modification is accepted.

*Example 5*

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1		X		
Year 2				X

**Example 6**

	Reading		Mathematics	
	AMO	% tested	AMO	% tested
Year 1				X
Year 2		X		

*Back-testing*

Data from 2006 and 2007 were used to determine what the effect of the proposed modification would have been. Analysis indicates that 25 schools that advanced in School Improvement under the current rules would have been identified as frozen at their 2006 School Improvement level. If the modification had been in place, two additional schools would have been identified to advance within the School Improvement system. The current guidelines allowed these two schools to remain frozen at their 2006 School Improvement levels.

Back-testing LEA data indicates that eight LEAs would not have been identified for LEA Improvement had this modification been in place. Additionally, one LEA would have been newly identified for LEA Improvement under the proposed modified method.

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