

**ESEA FLEXIBILITY Amendment  
Submission Template**

Dear Assistant Secretary:

I am writing on behalf of the Arizona Department of Education to request approval to amend the State’s approved ESEA flexibility request. The relevant information, outlined in the *ESEA Flexibility Amendment Submission Process* document, is provided in the table below.

<b>Flexibility Element(s) Affected by the Amendment</b>	<b>Brief Description of Element as Originally Approved</b>	<b>Brief Description of Requested Amendment</b>	<b>Rationale</b>	<b>Process for Consulting with Stakeholders, Summary of Comments, and Changes Made as a Result</b>
1.C	Arizona is a member of the Partnership for the Assessment of Readiness for College and Career (PARCC)	Arizona requests an amendment to exercise option B under principle 1.C.	The legal restrictions of Arizona procurement law prohibited the State Board of Education from entering into a single-source contract with PARCC without conducting a public bidding process. In order to avoid the appearance that the bidding process is merely a formality, Arizona opted to withdraw from PARCC prior to the rollout of operational assessments by the rest of the consortium. This preserves the integrity of the procurement process and lessen the likelihood the procurement will be challenged after award.	<p>The State Board of Education issued a request for information (RFI, attached) in late 2013, containing a broad set of specifications for a new statewide assessment aligned to college and career-ready standards. A number of vendors responded. All vendor responses were made public at <a href="http://www.azed.gov/state-board-education/new-statewide-assessment/">http://www.azed.gov/state-board-education/new-statewide-assessment/</a>.</p> <p>The request for proposals (RFP) process is ongoing. The RFP (attached) is public, and all responses will be public once the contract is awarded.</p>

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2.A.i—State-Developed Recognition, Accountability, and Support System	See pages 43-44.  Description of Arizona’s A-F Letter Grade System.	Describes the plan and timeline for how ADE will ensure that schools receiving a letter grade of NR will be evaluated and held accountable.	<p><b>PART B - MONITORING FINDING</b></p> <p>The ADE aims to hold all schools accountable in a fair and systematic fashion. Our current A-F Letter Grade Models require more than 30 test records over a three year period and/or AOI schools must have more than 100 FAY students enrolled in order to differentiate between programs designed for dual enrolled students versus fully operational schools. Schools not meeting these thresholds receive a grade of Not Rated (NR). <b>ADE is currently in the process of rolling out parallel accountability models for both AOI schools and NR schools. (See attached timeline)</b></p>	<p>Feedback has been collected at quarterly forums based strictly on accountability developments and improvements including the measurement of AOI schools and extremely small schools.</p> <p>Respective working groups composed of Charter Board representatives, stakeholders in the field, as well as agency personnel have been meeting regularly to develop the models.</p> <p>The discussion as well as articulated concerns have centered on how these models should be built (i.e. what components should be included, at what percent, and what a new grade scale should like like).</p> <p>Particularly with the Arizona Online Instruction schools there is concern over the measurement of percent tested and graduation rate because many of the schools serve dually enrolled students.</p>

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0581.

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2.A.i—State-Developed Recognition, Accountability, and Support System	See pages 45-48; 60-63.  Description of Arizona’s A-F Letter Grade System.	Timeline for incorporation of the CCRI graduation component of 15% for the 13-14 school year with full implementation at 25% to include Participation and Success indicators in following years.	This will address the condition on Arizona’s Flexibility Request as specified in the November 2013 letter from USED.  Finalization of letter-grading system, including the college- and career ready index and the data Arizona will provide to demonstrate that schools with low graduation rates do not receive high ratings in its letter grade system.	Once approved by the State Board for implementation, stakeholder feedback was collected at multiple Title 1 Committee of Practitioners meetings, Greater Phoenix Educational Management Council meetings, as well as several public forums throughout FY 14.  With regard to the implementation of the increased graduation rate, traditional high schools have been focused on what the new letter grade scale will look like and whether or not there will be face validity.  Both the schools and the State Board have expressed concern with the fact that the grading scale will have to be changed for each of the next two years to accommodate the new assessment and the implementation of the full CCRI. (See attached SBE Minutes)

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				<p>The focus of comments received by alternative high schools has been on determining the most appropriate way to include graduation rate and the new application process for the Alt-Focus schools.</p> <p>Technically, there are questions regarding the ability of the ADE data system to track students with high mobility and the required CCRI course data.</p> <p>Stakeholders identified concerns for smaller, less traditional schools' ability to demonstrate success on the identified course measures. Therefore, universal indicators and more equitable access features are being researched in collaboration with several community college systems in our state.</p>

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2.A.i—State-Developed Recognition, Accountability, and Support System  <b>PART B MONITORING FINDING</b>	See page 45.  Description of Arizona’s A-F Letter Grade System	Amend its request to reflect the change in the percentage of English Learners that needed to be reclassified in order for a school to earn the three additional points toward the composite score of its A-F letter grade.	<b>PART B - MONITORING FINDING</b>	During Practitioners of ELL quarterly meetings, the reclassification requirement was a true concern given the new assessment. Formal requests were made to the State Board to revisit the reclassification percentage. ADE proposed and the State Board approved an alignment with the AMAO in 2013 of 23%.
2.C. Reward Schools	See page 71.  Describe how ADE will publicly recognize and, if possible, reward highest-performing and high-progress schools.	Technical changes to conform to practice.	<b>PART B MONITORING FINDING</b>  ADE must amend its request to reflect the activities the SEA will engage in as it relates to reward schools.	
2.D. Priority Schools	Previously submitted to USED.	Updated list.	<b>PART B MONITORING FINDING</b>	Completed

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2.D. iii / iv Priority Schools	To be submitted May 11.  ADE originally described a robust intervention strategy for Priority Schools as well as a timeline for implementation.	In order to ensure that all priority schools, including newly identified, are and continue to fully and effectively implement interventions aligned with all turnaround principles in every year of implementation, ADE is submitting an amendment to refine systems and processes to support the bottom 5% of schools with leadership, talent management, instructional infrastructure and differentiated support and	<b>PART B MONITORING FINDING</b>  This amendment not only addresses a monitoring finding; it presented ADE with an opportunity to reevaluate its processes and procedures.	Based on lessons learned and findings from implementing the current systems and processes to support priority schools, ADE has sought feedback from stakeholders to determine the critical systems and processes that need refinement. <b>During the May 2014 Title I COP meeting, the School Improvement and Intervention Section shared the Why Amend? (Attached) document with the COP to share with stakeholders. During the meeting participants had an opportunity to share feedback and have any questions answered.</b>  <b>In addition, during the Priority schools webinar on April 30<sup>th</sup> the proposed changes were shared with schools and feedback was sought.</b>  Feedback from stakeholders at the LEA and school level of priority schools indicates that schools need more intensive support, particularly in the area of leadership as well as effective teachers and instructional infrastructure.

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		<p>accountability to significantly increase and sustain performance of the failing and lowest performing schools. This amendment will include a plan for the newly identified priority schools and any current priority schools that have not been fully implementing all principles to begin year 1 implementation in the 2014-2015 school year. <b>The 8/29 amendment includes language outlining a 90-day cycle check.</b></p>		<p>Feedback from Implementation Specialists and leadership coaches supporting priority schools indicates these same needs.</p> <p><b>Feedback was collected from Implementation Specialists (IS) and 28 Priority/Focus schools in a survey conducted in early May 2014. The School Improvement and Intervention Section sent out surveys to both ISs and LEAs/schools and reviewed results during an IS summit.</b></p> <p><b>In April 2014 a document explaining the proposed amendments (Attached) was sent to LEAs and schools in the state. This document had a section specifically in regards to the proposed changes for priority and focus schools.</b></p>

2.D. iii / iv Priority Schools	To be submitted May 11.	Provide flexibility in the implementation of interventions for Arizona Online Instruction (AOI) schools. 8/29 Amendment adds specific language on the implementation of interventions for AOI schools.	Allowing AOI schools to align their required intervention with either AdvancED or iNACOL standards will help ADE address the unique needs of online instruction.	Outreach to stakeholders occurred last year for the first submission of this amendment. Stakeholders are currently being notified of ADE’s resubmission soliciting feedback. In April 2014 a document explaining the proposed amendments (Attached) was sent to LEAs and schools in the state. This document had a section specifically in regards to the proposed changes for priority and focus schools. In addition, the document sent out to stakeholders addresses the proposed changes for AOI schools.
2.E iii Focus Schools	See page 94.  Last year a new category was approved for Alt-Focus Schools.	Updated list.  At the March 2014 meeting, the SBE approved a new alternative school definition and application process. The applications will be approved in May 2014 and a new Focus School list will be run that month.	<b>PART B MONITORING FINDING</b>	Extensive feedback was gathered last year while ADE was preparing the proposed amendment to Arizona’s flexibility request.  ADE Research and Evaluation worked primarily with the Alternative Education Consortium and the Title I Committee of Practitioners to determine the new definition and application process.

<p>2.E Focus Schools</p>	<p>To be submitted May 11.</p>	<p>To adequately address the reason why a school has been identified as a focus school, and to ensure that the academic needs of students in each of the subgroups in the school are met, ADE is submitting an amendment to refine systems and processes to support focus schools and ensure that all focus schools are implementing interventions aligned to the turnaround principles that address the subgroups not making progress.</p>	<p><b>PART B MONITORING FINDING</b></p> <p>This amendment not only addresses a monitoring finding; it presented ADE with an opportunity to reevaluate its processes and procedures to provide a more targeted intervention process.</p>	<p>Based on lessons learned and findings from implementing the current systems and processes to support focus schools, ADE has sought feedback from stakeholders to determine the critical systems and processes that need refinement. <b>During the May 2014 Title I COP meeting, the School Improvement and Intervention Section shared the Why Amend? (Attached) document with the COP to share with stakeholders. During the meeting participants had an opportunity to share feedback and have any questions answered.</b></p> <p><b>In April 2014 a document explaining the proposed amendments (Attached) was sent to LEAs and schools in the state. This document had a section specifically in regards to the proposed changes for priority and focus schools.</b></p> <p>Feedback from stakeholders at the LEA and school level of focus schools indicates that schools need more intensive support with developing, implementing and evaluating interventions aligned to the turnaround principles that specifically address the subgroups not making progress and are effective at increasing student achievement.</p>
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<p>2.E Focus Schools</p>	<p>ADE originally identified 127 Title I schools as Focus Schools.</p>	<p>Amend Table 2 to backfill the Focus list to ensure at least 10% of Title I schools are identified as Focus Schools.</p>	<p>Due to a significant number of focus school closures the Focus list fell below the required 10% of Title I schools to 114 Focus Schools. In order to backfill the Focus list ADE used the approved methodology in Arizona’s Flexibility Request using the most current state assessment data (2014). Using the approved criteria above, 520 schools were deemed as candidates for the purposes of backfilling the Focus list. Since it was not necessary to add this many schools, we prioritized schools based on the following:</p> <ol style="list-style-type: none"> <li>1. There were seven schools that were deemed candidates due to low graduation (Type H). These schools were added first.</li> </ol>	<p>During the May 2014 Title I COP meeting, the School Improvement and Intervention Section shared the Why Amend? (Attached) document with the COP to share with stakeholders. During the meeting participants had an opportunity to share feedback and have any questions answered. In addition, the need and process to backfill the priority and focus school list was shared in the May and August COP meeting. Participants expressed that current data be utilized to determine the backfill schools.</p>
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			<p>2. For the nine additional schools that were added, priority was given to schools that had more than one designation. Of the schools that had multiple designations (that did not meet for graduation rate), all of which were deemed candidates on the basis of having a high within-school achievement gap (Type F) and a low achieving subgroup (Type G).</p> <p>3. Of the schools that were both Type F and Type G, priority was given first to schools with a high achievement gap between the bottom quartile and top two quartiles. Of the schools with the same achievement gap between the bottom quartile and the top two quartiles (to two decimal points), priority was given to schools with the lowest gains in performance for the bottom quartile across the two most recent fiscal years.</p>	
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2.F & 2.G	Changes to conform with amendments for 2.D and 2.E	Changes to conform with amendments for 2.D and 2.E		

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<p>3.A, 3.B &amp; Attachment 10</p> <p>Develop and adopt guidelines for local teacher and principal evaluation and support systems</p>	<p>See pages 160-175.</p> <p>The Framework for Evaluating Educator Effectiveness as adopted by the Arizona State Board of Education was intentionally designed to provide flexibility for LEAs.</p>	<p>There are numerous amendments to address remaining conditions on Arizona's Flexibility Request, specifically regarding the alignment of Arizona's Framework for Evaluating Educator Effectiveness with USED Flexibility guidance.</p>	<p>This will address the condition on Arizona's Flexibility Request as specified in the November 2013 letter from USED.</p>	<p>Based on extensive stakeholder feedback gathered at meetings and presentations throughout the year, ADE approached the resolution through the lens of a successful transition to a new assessment.</p> <p>The difficulty adjusting to changing requirements and the delayed receipt of state assessment data have been the predominant concerns ADE has received.</p>

Attached to this letter is a redlined version of the pages from our approved ESEA flexibility request that would be impacted with strikeouts and additions to demonstrate how the request would change with approval of the proposed amendment[s]. Please contact Jennifer Liewer at [Jennifer.Liewer@azed.gov](mailto:Jennifer.Liewer@azed.gov) or by phone at 602-542-1755 if you have any questions regarding these proposed amendments.

The Arizona Department of Education acknowledges that the U.S. Department of Education may request supplementary information to inform consideration of this request.



Chief State School Officer

August 29, 2014

