



September 30, 2016

RE: Arizona State Education Consolidate State Plan – First Draft

To whom it may concern,

On behalf of the board of directors of Arizona Citizens for the Arts, our 86 statewide arts and culture organization members and our 5,000 supporters, we are pleased to comment on the first draft of Arizona's State Plan for the Every Child Succeeds Act (ESSA), and the manner in which the plan addresses the critical role that high quality, standards-based arts education taught by highly effective teachers plays in promoting academic achievement in our young people.

As our earlier comments to **RFI #ADED16-0002** (July 15, 2016) noted, much data exists to demonstrate high quality arts education contributes to dramatic improvements in student achievement due to its impact on academic performance and individual student self-efficacy and engagement.

Of particular note, the impact of arts education integrated across curriculum has been credited specifically with positive change in reading, thinking skills, language development and even mathematics.

As we noted in our earlier comments, we believe these results are compelling enough to merit specific recognition for arts education among the required indicators. We also believe that inclusion of the arts directly and by reference is supported in Arizona policy by the following:

1. The Arizona Administrative Code (R7-2-301) requires instruction in music and visual arts in K-8 schools.
2. Arts education was deemed enough of a priority for the State Department of Education and the State Board of Education to complete a rigorous and collaborative process to revise the Arizona Academic Standards in the Arts in May 2015 so they are now focused on the creative and thought processes that can foster artistic literacy among all students.

ESSA, itself, expressly articulates music and arts education as a component of a "well-rounded" education, indicating that there should be accountability for its inclusion in curriculum. Therefore, we recommend adjustments to the draft plan as follows (in boldface).

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Sec. 299-17 (b) Accountability

The Arizona Department of Education (ADE) intends to include explicitly required indicators as outlined in the Act as well as a measure of well-rounded education and course access to indicate school quality. To ensure a single system of accountability for all Arizona public schools and LEAs, the final methodology may reflect policy decisions adopted by the SBE for the A-F Letter Grade Accountability System.

Specifically call out ALL subject areas in the measure of a well-rounded education and course access as defined in a "well-rounded education" under ESSA [Sec. 8002(52)]. By using all of the "well-rounded education" subjects, the accountability system will be able to differentiate school performance as required by law (Sec.1005c4BvI).

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While not part of the A-F accountability system, Arizona recognizes the need to provide more useful, comprehensive information regarding schools and LEAs to the public – beyond just summative ratings – particularly with respect to how schools and LEAs are supporting a well-rounded education for their students. The Arizona Department of Education will provide more comprehensive data and information to the public for schools and LEAs to help inform and empower school choice, through helping parents identify the most appropriate school for their child. School and LEA searchable school report card profile information will be made available online through the Arizona Department of Education website that will include more comprehensive information on academic and other programs and options offered by a school or LEA – including elements such as Career and Technical Education (CTE) program options, health and wellness programs, advanced and accelerated learning options - such as advanced placement programs and gifted education programs -, arts and music programs, athletics and physical education programs and educational technology options and supports

Strike the modifying phrase “While not a part of the A-F accountability system...” Making the multiple measures that are included in the A-F system explicit for parents and community stakeholders through the disaggregated detail included in the state report card system will help parents makes decisions about where to send their children. Including access to well-rounded education subjects, broken out by subject, also is highly useful information to include among the multiple measures reported in the school report card system. Given the gaps in arts education access in Arizona, we also believe this will encourage more equity in arts education because more students will receive arts education; schools will be demonstrating greater commitment to a well-rounded education, and that will positively impact their accountability ratings.

Sec.299-17 (2)

Development and implementation of school and LEA Comprehensive Strategic Plans which include evidence-based interventions addressing student academic achievement and school success including, but not limited to such topics as:

Include a bullet which says: Access to a well-rounded education as a whole school reform model.

This language, by reference, will support the potential implementation of arts education programs which have been demonstrated to be effective components, if not drivers, of school improvement.

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R7-2-604.7b Support for Educators (1) ii

The Arizona Department of Education continues to support, leveraging Title II-A funds, many initiatives and projects to improve the quality of effectiveness of teachers and principals including, but not limited to:

Add a bullet which articulates support in well-rounded education subject areas. This will, by reference, encourage teacher development and support for arts educators as well as others.

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Sec.299.19(a)1(ii)

We note that the ESSA draft regulations (as reflected in this document) enumerated the subject areas defined as a “well-rounded” education and – perhaps as a drafting error – omitted “arts.” We reiterate that “arts” IS included in ESSA as a component of a “well-rounded” education; it is mandated in Arizona Administrative Policy and standards have been defined and adopted.

Therefore, it also should be included by reference as a part of the “well-rounded instructional experience.”

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Sec.299.19-(a)4(i)

Per ESSA, we believe that the state also will be required to develop a needs assessment for Title IV in order to explicitly list needs that the state will support for a well-rounded education. This does not seem to be reflected in this draft.

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Sec.299-19(a)4ii

The Arizona Department of Education will review and approve LEA applications for subgrants under included programs...and model described in Section 299.14 (c) 1-3 (pages 5-10).

Further, for resources received by LEAS for Title IV-A:

- *The Arizona Department of Education will:*

Incorporate explicit language that notes that full access and availability of the components of a “well-rounded” education is an equity issue and therefore should be addressed in LEA needs assessments and in eligibility for subgrants. Such language will promote the use of Title IV to increase access to arts education.

We would further note that language from Title IV (see below) indicates the intent to address access to a “well-rounded education” and also explicitly notes the inclusion of arts education.

Title IV – Language from the law (Section 4104, b, 3, A II):

“Supporting local educational agencies in providing programs and activities that— “(A) offer well-rounded educational experiences to all students, as described in section 4107, including female students, minority students, English learners, children with disabilities, and low-income students who are often underrepresented in critical and enriching subjects, which may include (II) activities and programs in music and the arts.”

In sum, we believe these enhancements to the draft plan clarify the intent of the department to emphasize the importance to arts education that is already reflected in administrative policy and the good work that resulted in the adoption of the revised Arts Standards. Most importantly, more Arizona children will be exposed to the myriad benefits of arts education (no doubt improving their overall educational experience) and schools will be credited for recognizing arts education is integral to a well-rounded education.

Respectfully submitted,



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Executive Director