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Diane Douglas
Superintendent of Public Instruction
State of Arizona Department of Education
1535 W. Jefferson Street
Phoenix, Arizona 85007

RE: Arizona School Accountability Components & System

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Dear Miss Douglas:

On behalf of Chicanos Por La Causa, Inc. (CPLC) thank you in advance for considering the following comments regarding the Development of Arizona's Implementation Plan for the Every Student Succeeds Act (ESSA):

- While we appreciate the inclusion of charter schools in the language, charter schools vary in focus and size. We suggest that there should be different expectations under the law. This would mean that the State would differentiate between traditional school districts and charters. Charter schools should not be set to the same accountability structure as traditional schools as charters already have two regulatory agencies, the Arizona State Board for Charter Schools and the AZ Dept of Ed.
- With respect to student assessment outcomes and graduation rates, and specifically subgroups, we suggest that the State identifies a performance formula which allows for growth. This means that we should be able to show academic growth and be allowed to benchmark it throughout the academic school year versus a onetime snap shot of performance. Graduation rates should consider 5th year graduates. As it stands, we do not consider 3 or 5 year graduates, only those graduating within their cohort year. This is a challenge for charter schools like ours who serve "at-risk" credit deficient students. Furthermore, we should be able to measure progressive academic performance in ELA and Math. As well as the ability to measure growth with English Language Learners and SPED populations. School size should be a consideration in measuring certain accountability measures and percentage of growth set.
- Progress towards college and career readiness for all schools, especially 9-12 needs to be defined. How will we measure progress towards this goal? Again, we need to be inclusive of all graduates regardless of whether they graduate within cohort



CHARTERED MEMBER



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group, and possibly by subgroup. For example, if 90% of the population is Hispanic, we should be able to tailor the strategies that support this subgroup. Putting safety nets in place and growth metrics that are realistic for ELL, SPED, college going versus trade (career) going groups.

- For Highly Qualified Teachers, identify a tool that does not consist of a checklist on whether a person is qualified to teach. The current system allows for a teacher to be either certified or HQ. Neither of these tools helps determine teacher's performance. Other factors or metrics should be included and need to be identified.
- The plan proposes to continue using the Comprehensive Needs Assessment that has been used for the last several years. While it's described as a structured process, it's a tool that doesn't necessarily get to the root of school issues and concerns. This is demonstrated in the fact that we have many schools that continue to struggle/fail despite use of the tool.
- The plan states that the Needs Assessment along with the Strategic Plan will allow for districts to satisfy the majority of programmatic requirements of all state and federal grants received at the district level in one plan. Depending on the details, the idea of streamlining this process is a positive proposal.
- The plan refers to the Arizona English Language Proficiency Standards as the foundation for linguistic knowledge for students who are not proficient in English. However, these standards do not provide the level of rigor required for our ELL's to pass the state assessment, AzMerit. The plan does not detail the specific model for ELL instruction. However, if the current 4-hour block model continues for these students, they will continue to receive this isolated presentation of proficiency standards as opposed to the comprehensive rigor of Arizona standards commensurate with their English proficient peers.
- With regard to the school accountability system (Letter Grade Accountability), specifics are not outlined and a broad statement is noted that the State Board of Education will decide.
- Local education agencies should be able to access a data collection and sharing system for students and educators to address the high mobility



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rate among not only Latino students but also low income and disenfranchised children in urban and rural communities. This system would be similar to what the health care industry had to adopt to better provide a comprehensive patient needs assessment. As a result of adopting this, the health care industry has improved the quality of their services and enabled greater accountability.

Once again, on behalf of CPLC, thank you for your consideration. We look forward to much success as we work together and listen to all the voices within the community in creating an excellent education system that prepares all students without discrimination toward their pursuit of a meaningful and fruitful life.

Sincerely,

Andres L. Contreras
Executive Vice President
Social Services & Education
Chicanos Por La Causa, Inc.