



A REPORT  
TO THE  
ARIZONA LEGISLATURE

Performance Audit Division

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Performance Audit

# Arizona Department of Education— Accountability Programs

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JUNE • 2006  
REPORT NO. 06 – 04



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**Debra K. Davenport**  
Auditor General

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STATE OF ARIZONA  
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June 29, 2006

Members of the Arizona Legislature

The Honorable Janet Napolitano, Governor

Mr. Tom Horne, Superintendent of Public Instruction  
Arizona Department of Education

Transmitted herewith is a report of the Auditor General, A Performance Audit of the Arizona Department of Education's (ADE's) accountability programs. This report is in response to Arizona Revised Statutes (A.R.S.) §41-2958 and was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03. I am also transmitting with this report a copy of the Report Highlights for this audit to provide a quick summary for your convenience.

As outlined in its response, ADE agrees with all of the findings and plans to implement or implement in a different manner all of the recommendations.

My staff and I will be pleased to discuss or clarify items in the report.

This report will be released to the public on June 30, 2006.

Sincerely,

Debbie Davenport  
Auditor General

Enclosure



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# INTRODUCTION & BACKGROUND

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The Office of the Auditor General has conducted a performance audit of the Arizona Department of Education's (ADE's) accountability programs pursuant to Arizona Revised Statutes (A.R.S.) §41-2958. This audit was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03 and is the first in a series of three reports regarding ADE. The other two audit reports will address aspects of ADE's administration and allocation of state and federal funds and ADE's information management function.

The 21st century brought with it a new focus on school accountability at both the federal level and in Arizona. At the national level, in 2002, Congress passed the No Child Left Behind Act (NCLB), setting a goal that all children in the United States attain academic proficiency by the 2013-2014 academic year. A little more than a year before NCLB's enactment, Arizona passed an accountability system, called Arizona Learns, which annually seeks to identify and assist all public schools, including charter schools, that are underperforming or failing as measured by student performance.

## NCLB established federal school accountability

NCLB was established to ensure that by 2014 all students in American schools are proficient in reading, writing, and math. To achieve this goal, NCLB emphasizes school accountability, flexibility and local control, parental choice, and quality teaching. Under NCLB, schools must make Adequate Yearly Progress (AYP), and those who do not are provided additional assistance to improve student performance. NCLB applies to all students in public schools, not just those in schools that receive federal Title I funds; however, consequences of not meeting AYP goals apply only to Title I schools.

NCLB has four guiding principles—NCLB was designed to bring all students to a proficient level of achievement under each state's academic standards by

### Title I Funds and Schools

Title I funds are monies awarded to schools and districts by the federal government to assist in educating children who meet federal poverty standards. Title I schools are those schools that receive Title I funds. According to ADE, as of the 2004-2005 academic year, 1,077 of Arizona's schools, or 60 percent, were Title I schools.

2013-2014. NCLB is based on four key principles that require states to establish stronger system-wide accountability for results, allow flexibility and local control, increase parental choice, and focus on teaching methods that have demonstrated results. Specifically:

- **Accountability**—NCLB is designed to help all students meet high academic standards by requiring states to create annual assessments that measure what children know and can do. These tests are based on state standards and allow stakeholders to track the performance of every school in the nation. Student performance data is classified based on the assessment results by poverty level, race, ethnicity, disability, and limited English proficiency.
- **Flexibility and local control**—NCLB gives states and school districts flexibility in how they spend some federal dollars in return for greater accountability, such as entering into performance agreements covering the use of the funds. Thus, the decision-makers most in touch with students' needs are choosing which programs are essential to achieving the desired results. For example, NCLB allows districts to transfer up to 50 percent of the federal formula grant funds they receive under specific federal programs to another of these programs, or to the district's Title I program, without separate approval.<sup>1</sup>
- **Parental choice**—NCLB provides options for parents with children attending low-performing schools. Under NCLB, schools that fail to make AYP for 2 consecutive years must provide students the option of transferring to another school. Subsequently, if a school fails to make AYP for a third year, they must provide eligible students supplemental education services such as tutoring, after-school programs, and summer school. The NCLB Act also provides parents, educators, and communities with more flexibility to create new charter schools, since public schools that fail to make AYP for 6 consecutive years can be transformed into a charter school.
- **Quality teaching methods**—NCLB emphasizes using educational programs and practices that have clearly demonstrated their effectiveness through rigorous scientific research. Federal funding is targeted to support those programs and teaching methods that improve student learning and achievement.

**Schools must make AYP**—NCLB requires schools to make AYP to achieving full proficiency by 2014. ADE calculates the AYP designations under NCLB for Arizona schools, as it has since 2003. AYP is an annual designation of “meets” or “does not meet” that is given to schools and districts throughout the nation. AYP is calculated for both Arizona schools and districts, and is based on four criteria: AIMS scores, the percentage of students who took AIMS, elementary school attendance rates, and high school graduation rates. While AYP is a designation used nation-wide, Arizona sets standards that are approved by the federal government stating what schools and districts need to meet for each of the four measures. In academic year 2004-2005, 1,547 of Arizona's 1,781 schools that

<sup>1</sup> These programs are Improving Teacher Quality State Grants, Educational Technology, Innovative programs, and Safe and Drug-Free Schools programs.



received an AYP designation met AYP. To meet AYP, a school must meet AIMS and percent-tested standards for each of eight designated subgroups.<sup>1</sup>

Arizona AYP Determinations  
Academic Year 2004-2005

- 1,547 schools met AYP.
- 234 schools failed to meet AYP.

ADE administers NCLB programs to aid schools not meeting AYP—In order to address schools and/or districts identified for improvement based on not meeting AYP under NCLB, ADE has two school effectiveness programs. These programs are School Improvement and State Intervention. Under NCLB, schools that fail to make AYP for 1 year suffer no consequence, but are given a warning. As of academic year 2004-2005, there were 85 Arizona schools in this warning year (see Table 1). However, schools that fail to make AYP for 2 consecutive years are placed in the NCLB school improvement program, administered by ADE, and must provide their students the option of transferring to another school. The School Improvement program provides help in identifying areas for improvement and in facilitating that improvement. In academic year 2004-2005, there were 56 schools in Year 1 School Improvement, meaning that the school has failed to meet AYP for 2 consecutive years. If a school fails to make AYP for a third year, it must provide supplemental tutoring services to students at that school. ADE works with districts and schools to promote these tutoring services to parents, and to approve and review the performance of tutoring providers (see Finding 2, pages 21 through 27). In academic year 2004-2005, there were 42 Arizona schools in Year 2 School Improvement (see Table 1).

Failure to meet AYP for a fourth year moves the school into the NCLB school intervention program and into the Corrective Action stage of school intervention. ADE has a school intervention program that aids schools in corrective action with development of a plan for correcting their deficiencies, and ADE's intervention program staff provides ongoing assistance in implementing that plan. In academic year 2004-2005, there were 27 Arizona schools in the Corrective Action stage (see Table 1). Not meeting AYP goals for a fifth year moves the school into the Planning to Restructure stage of the school intervention program, and a sixth year of not meeting AYP requires restructuring of the school. Restructuring involves significant changes to the school, and could result in replacing the staff and administration, transforming the school into a charter school, contracting with a private management company to run the school, or allowing the school to be taken over and administered by the State. For academic year 2004-2005, 20 Arizona schools were in the Planning to Restructure stage and 4 schools were in the Restructuring stage (see Table 1). Schools are released from the improvement or intervention program as soon as they meet AYP for 2 consecutive years.

Table 1: Status of Arizona Schools in NCLB Improvement or Intervention Programs Academic Year 2004-2005

<b>School Improvement</b>	
Warning year	85
Year 1 improvement	56
Year 2 improvement	42
<b>State Intervention</b>	
Corrective action	27
Planning to restructure	20
Restructuring	4

Source: Auditor General staff analysis of information provided by ADE staff.

<sup>1</sup> These eight subgroups are African-American, American Indian, Caucasian, Economically Disadvantaged, Asian Pacific Islander, Hispanic, Students with Disabilities, and Limited English Proficiency.

## Arizona Learns tracks state school accountability

Before Congress passed NCLB, Arizona's school accountability system, known as Arizona Learns, was established by statute and voter approval of Proposition 301 in November 2000. This proposition tasked ADE with compiling an annual achievement profile for each public school. In addition, Arizona Learns required ADE to assist schools classified as Underperforming or Failing. Since Arizona Learns predates NCLB, some of the requirements under Arizona Learns are different than those under NCLB (see Table 2), though both requirements are fully in force.

Arizona Learns classifies schools based on their students' performance—Under Arizona Learns, ADE annually classifies each public school in the State under one of six achievement profiles. Achievement profiles rate

**Table 2:** Comparison of Selected Aspects of NCLB and Arizona Learns  
As of October 2005

	NCLB	Arizona Learns
<b>Measurement components</b>	AIMS scores Percentage of students assessed Attendance/graduation rates	AIMS scores Measure of Academic Progress (MAP) Graduation/dropout rates Adequate Yearly Progress (AYP)
<b>Classification for schools</b>	School made AYP School did not make AYP	Excelling Highly performing Performing plus Performing Underperforming Failing to meet academic standards
<b>Progression of corrective action</b>	Did not make AYP 1 year: <ul style="list-style-type: none"> <li>No consequence—warning year</li> </ul> Did not make AYP 2 years: <ul style="list-style-type: none"> <li>School improvement year 1</li> </ul> Did not make AYP 3 years: <ul style="list-style-type: none"> <li>School improvement year 2</li> </ul> Did not make AYP 4 years: <ul style="list-style-type: none"> <li>Corrective action</li> </ul> Did not make AYP 5 years: <ul style="list-style-type: none"> <li>Planning to restructure</li> </ul> Did not make AYP 6 years: <ul style="list-style-type: none"> <li>Restructuring</li> </ul> School is "free and clear" of these consequences as soon as it makes AYP for 2 consecutive years.	Underperforming year 1 <ul style="list-style-type: none"> <li>School improvement</li> </ul> Underperforming year 2 <ul style="list-style-type: none"> <li>School improvement</li> </ul> Underperforming year 3 and Failing to meet academic standards (pending site visit) <ul style="list-style-type: none"> <li>State intervention</li> </ul> School is "free and clear" of these consequences as soon as it is designated Performing, Performing Plus, Highly Performing, or Excelling.

Source: Auditor General staff analysis of ADE School Effectiveness Division's *Intervention Handbook* and of academic year 2004-2005 achievement profiles from ADE's Web site as of October 17, 2005.

school performance as Excelling, Highly Performing, Performing Plus, Performing, Underperforming, or Failing. As of academic year 2004-2005, 1,749 of Arizona's 1,876 public schools that receive an achievement profile were classified as Performing or better (see Table 3). These achievement profiles are based on a mix of criteria. For both elementary schools and high schools, the schools' AIMS scores and the schools' AYP designations are used. Some elementary schools also evaluated based on their students' scores on the Terra Nova test, which recently succeeded the Stanford 9 in Arizona schools.<sup>1</sup> Achievement profiles for high schools take into account graduation rates and dropout rates.

**Table 3:** Arizona Learns Achievement Profiles Academic Year 2004-2005

Achievement Profiles	Number of Schools
Excelling	228
Highly Performing	254
Performing Plus	494
Performing	773
Underperforming	123
Failing	4

Source: Auditor General staff analysis of information provided by ADE's Web site and ADE staff.

ADE has programs to assist schools that are **Underperforming or Failing**—ADE has two school effectiveness programs that address underperforming or failing schools under Arizona Learns. These programs are School Improvement and State Intervention. Under Arizona Learns, a school is in the School Improvement program when it is designated as Underperforming, and remains in the program if it is Underperforming a second consecutive year. If the school is Underperforming for a third consecutive year under Arizona Learns, it is reclassified as Failing and becomes part of the State Intervention program. A school is removed from either the improvement or intervention program if it is reclassified as Performing, Performing Plus, Highly Performing, or Excelling. As of the 2004-2005 academic year, 123 of Arizona's public schools are in the School Improvement program, and four are in the State Intervention program.

**School Improvement and State Intervention**—Under Arizona Learns, schools designated as Underperforming receive services from the school improvement section, and schools designated as Failing receive services through state intervention.

Under Arizona Learns, a first-year underperforming school is required by statute to create an Arizona School Improvement Plan (ASIP) and submit it to ADE. After the ASIP is submitted, ADE puts together an external review team called a Solutions Team to review the ASIP and the school. The Solutions Team will issue a report on the school and its ASIP, after which an ADE staff member, known as an ASSIST Coach, works with the school to implement the ASIP.

Under Arizona Learns, the State Intervention program takes over when a school is designated as failing. As of academic year 2004-2005, there are four public schools in Arizona that are designated as Failing. The State Intervention program has a variety of options available to help restore a school to Performing status or better. To help determine what course to take, a State Intervention assessment team goes to each failing school and interviews teachers, staff, and both school and district administrators. The team's findings are reported to an ADE intervention planning team composed of superintendents, assistant superintendents, principals, teachers, and budget officers, who decide what intervention type the school should use. Intervention options range from continuing the type of oversight a school received in the school improvement program, to assigning mentors and

<sup>1</sup> The Terra Nova test is used to assess the performance of 2nd- and 9th-graders in Arizona on reading, language arts, and mathematics.

installing a turnaround principal. According to ADE, assigning a turnaround principal or assigning a mentor to the current principal were the intervention strategies most commonly used during the 2004-2005 academic year. Under the State Intervention program, the State can also fully assume responsibility for running the school, though as of 2005-2006, no school has been fully taken over by the State for academic reasons.

## Staffing for school assistance and tutoring

ADE's responsibilities for school assistance programs and tutoring services are assigned within two divisions. ADE responsibilities for school accountability are assigned to areas within the School Effectiveness Division. Staff assigned in the Title I section under the Academic Achievement Division administer the state-funded tutoring program and the federal Supplemental Education Services (SES) tutoring program.

The School Effectiveness Division's School Improvement, State Intervention, and Best Practices sections each provide services related to ADE school accountability programs. Specifically:

- **The school improvement section (14.5 authorized positions, 2 vacancies as of April 11, 2006)**—This section is responsible for administering and implementing assistance to schools that have been labeled Underperforming under Arizona Learns for up to 2 consecutive years. The section conducts training for schools to develop Arizona State Improvement Plans (ASIPs) and receives completed ASIPs from schools that have been classified as underperforming under Arizona Learns. Additionally, the section reports schools with late ASIPs for sanctioning. This section also recruits and deploys external Solutions Teams. Further, this section employs ADE staff who serve as ASSIST Coaches to provide ongoing assistance to schools. Finally, this section implements NCLB school and/or district improvement activities for those schools and/or districts identified for school improvement based on not meeting AYP.
- **The state intervention section (6 authorized positions, 0 vacancies as of April 11, 2006)**—This section works with schools that have been classified as Failing under Arizona Learns. The state intervention section employs site review teams to visit schools and prepare recommendations for ADE's Intervention Planning Team on how best to address the schools' areas for improvement. The state intervention section helps to hire any administrative staff who are assigned to failing schools as new leadership or as mentors. The section is also responsible for assisting schools in the implementation of their improvement plan. Finally, this section is responsible for assisting with the drafting and implementation of

restructuring plans for schools requiring corrective action under federal NCLB intervention guidelines.

- **The best practices section (19 authorized positions, 1 vacancy as of April 11, 2006)**—This section has four units, one of which deals with school assistance mandated through accountability programs. This unit, academic and instructional support (1 authorized position, 1 vacancy), coordinates and selects topics for best practices academies, which are offered to school and district staff from around the State. The unit has developed topics for academies based on addressing common challenges and weaknesses found in underperforming schools and focusing on the state standards established for school improvement. This unit also helps to provide tools and resources to schools and teachers via the ADE Web site, such as the *Resource Guide for the Standards and Rubrics for School Improvement* and the ADE connections of support. Additionally, upcoming activities and other related resources for all indicators under each of the four standards for school improvement are provided on-line.

The Academic Achievement Division's Title I section handles the State's responsibilities regarding its state-funded tutoring program and the federally funded SES tutoring program. These staff are responsible for the following activities for the federal and state tutoring services:

- **Title I section (15 authorized positions, 1 vacancy as of April 10, 2006)**—This section's state and federal tutoring activities include administering ADE's state-funded tutoring program for pupils attending an underperforming or failing school and high school juniors or seniors who have failed to pass one or more portions of the AIMS test. ADE provides tutoring funds directly to districts or tutors that participate in the program and requires tutor providers to register on-line and provide session information on students in order to be paid. This section also approves and assesses the effectiveness of providers for the NCLB Supplemental Educational Services tutoring program. This program allows children attending a Title I school to receive free tutoring services if the school is in federal low-performing status after 3 years.

## Scope and methodology

This audit focused on how closely the Department follows common practices recognized in the literature to assist in improving student achievement and on the State's efforts to increase participation and ensure accountability in the state-funded and federally funded tutoring programs. This audit report contains two findings and associated recommendations:

- ADE generally follows practices from literature and other states, but could make some improvements (see Finding 1, pages 11 through 18).
- ADE has made efforts to improve participation in the state-funded tutoring program, but should continue to improve accountability in both the state-funded and federally funded tutoring program (see Finding 2, pages 21 through 27).

This report also contains other pertinent information regarding the limitations of comparing student performance on state accountability tests across states, as well as information about one national test given to students from all states.

Various methods were used to study the issues addressed in this audit. General methods used for all areas include interviews with ADE management and staff, as well as interviews with staff members from other states related to school improvement programs and tutoring programs. Additionally, auditors obtained information from Arizona Revised Statutes and the federal No Child Left Behind Act.

The following specific methods were used in reviewing each area:

- To determine how closely ADE follows common practices recognized in the literature to assist in improving student achievement, auditors conducted a literature search for key elements of practices for school improvement and reviewed this literature's findings. Additionally, auditors interviewed an education professor from the University of Arizona regarding issues related to school improvement, and also discussed with him the results of his review of school solutions teams within ADE's School Improvement program. Auditors also reviewed common practices for school assistance through interviews of state education department staff in Florida, Kentucky, Massachusetts, North Carolina, and South Carolina, as well as reviewing Web sites, statutes, or other policies from these states. Auditors assessed the quality of School Improvement Plans by reviewing plans from several underperforming schools. Auditors further interviewed administrators at some underperforming schools regarding ADE's ASIP preparation training, the schools' use of ASSIST Coaches, and the degree to which ADE's School Improvement program has proved helpful. Finally, auditors reviewed several relevant ADE reports and policies and procedures regarding various aspects of Arizona's School Improvement and State Intervention programs.
- To determine ADE's efforts to increase participation and ensure accountability in the state-funded and federally funded tutoring programs, auditors used several methods. Auditors interviewed staff from Roosevelt Unified School District and Tucson Unified School District to assess the Department's assistance regarding state-funded tutoring and federal Supplemental Education Services tutoring. Additionally, auditors reviewed relevant Arizona statutes, State Board of Education meeting minutes, ADE reports, and policies and procedures.

Auditors also interviewed state department of education staff in Pennsylvania, Illinois, Massachusetts, and Texas to gather information on their states' role in state and federally funded tutoring programs.

- To develop information on the limitations of comparing student performance across states, auditors interviewed ADE's state coordinator for the National Assessment of Educational Progress (NAEP) and reviewed the Web sites of the U.S. Department of Education and the National Center for Education Statistics.
- To develop information in the Introduction and Background section, auditors reviewed *No Child Left Behind: A Desktop Reference* (2002) provided by the U.S. Department of Education, unaudited documents generated and provided by ADE, and the language of Proposition 301 passed by Arizona voters in 2000.

This audit was conducted in accordance with government auditing standards.

The Auditor General and staff express appreciation to the Superintendent, Deputy Superintendent, and other ADE staff for their cooperation and assistance throughout the audit.





# FINDING 1

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## ADE generally follows best practices for School Improvement program, but can make improvements

ADE has implemented school accountability measures under Arizona Learns and the federal No Child Left Behind Act (NCLB), but can do more to review and provide guidance for school improvement plans, and to provide more intensive and specialized technical assistance to low-performing schools. ADE's School Improvement program generally follows five elements of best practices set out in literature on school assistance programs, including requiring underperforming schools to develop school improvement plans, requiring external teams to review the plans, and providing ongoing technical assistance through its staff. However, ADE can do more to help ensure that school plans are appropriate and adequate as guidance to the schools. Additionally, ADE should consider instituting a pilot program to offer full-time, on-site experts to one or two particularly weak underperforming schools. Finally, ADE could provide more specialized assistance to schools through its technical assistance staff, such as providing mentors for teachers and principals.

## Accountability systems focus on raising performance

Arizona Learns and other accountability systems have been established with the purpose of improving student achievement. ADE's program to improve student achievement in underperforming schools is the School Improvement program. This program is funded by state monies from the Proposition 301 sales tax increase passed by voters in November 2000. ADE's School Improvement program generally follows common accountability practices followed by other states. However, the School Improvement program could better meet best practices recommended in literature in the areas of external assistance and monitoring and evaluation.

**ADE funds School Improvement with state appropriations**—The School Improvement program is state-funded through the School Accountability Fund, which receives monies through the Proposition 301 sales tax increase passed in 2000. According to ADE, for fiscal year 2006, the School Improvement program received \$1.8 million, and as of March 31, 2006, had spent \$185,887 of those funds. In addition, ADE reports that the School Improvement program keeps monies that were not used from previous fiscal years, and, as of March 31, 2006, the School Improvement program had approximately \$1.1 million available from previous fiscal years. This brings the total available for School Improvement activities to \$2.73 million. According to ADE, the School Improvement program has expenses that are lower than the monies it received in part because the Joint Legislative Budget Committee (JLBC) has not approved ADE's requests for additional ASSIST Coach positions. For fiscal year 2007, the JLBC has recommended 12 additional positions funded by the School Accountability Fund.<sup>1</sup>

**Arizona follows practices recommended in the literature and followed in other states**—The Arizona School Improvement program contains features recommended in literature, and commonly found in other states' school improvement programs (see Bibliography, pages a-iii through a-iv). Auditors reviewed school accountability literature listing five areas that states should require for successful school improvement. These are:

- **Alignment of standards to assessments**—First, states are responsible for providing curriculum standards for subject areas and different grades, and states should ensure that accountability assessments are testing students on the information provided for in the curriculum standards. ADE has made significant progress in aligning its state assessment with academic standards, but the U.S. Department of Education requested additional information in March 2006 to support that alignment is complete.
- **State-wide identification of low-performing schools**—The second School Improvement element is that states must devise a system to identify low-performing schools. ADE identifies low-performing schools by creating an achievement profile based on several factors, including student scores on the AIMS test.
- **School improvement strategy**—A school improvement strategy is a third element of school improvement. Included in this school improvement strategy are needs assessments, plans for implementation of school improvement, and capacity building. States play an important role in ensuring that schools adopt a school improvement strategy.
  - Needs assessments use data from student performance and other data on the school to provide information on school needs and are considered the foundation of improvement plans. ADE requires that schools perform a needs assessment to identify areas for improvement, and has an

<sup>1</sup> JLBC recommended a total of 17 positions funded by the School Accountability Fund. However, this represents a net increase of 12 since 5 of the positions already exist at ADE, but are being paid for by other monies. These positions could be designated for either School Improvement or another program funded by the School Accountability Fund.

external team of educators known as a Solutions Team evaluate the needs assessment. For example, the team evaluates how well the school uses its achievement data to assess its overall needs and how well the school used ADE's *Standards and Rubrics for School Improvement* in creating the needs assessment.

- o School Improvement plans include detailed descriptions on how areas of weakness identified in the needs assessment will be addressed and identify resources and timelines. Arizona statute requires schools to develop improvement plans, and a Solutions Team evaluates the plan along with the needs assessment and provides an overall assessment of whether the plan is adequate. The Solutions Team will also provide recommendations prioritized by need for areas where plans can be improved.
- o Capacity building refers to identifying and developing financial and human resources to allow the school to make and sustain improvement. ADE endeavors to build capacity in different ways. For example, ADE tries to improve teacher quality by having schools include professional development opportunities in improvement plans. In addition, ADE's ASSIST Coaches provide information on further areas for professional development. ADE's best practices group uses information from Solutions Teams' findings to tailor professional development workshops, called Best Practices Academies, offered to a wide variety of teachers and administrators. According to ADE, they also encourage administrators to attend teacher workshops and try to provide information in the workshops that is useful for administrators, such as helping teachers implement the ideas from the workshop in the classroom.
- **External assistance**—The fourth element from literature regarding school improvement is that states should provide underperforming schools with appropriate outside assistance to facilitate the implementation of the School Improvement plan. ADE provides underperforming schools with external assistance in various ways. First, ADE provides free tutoring to all students in underperforming schools who wish to apply for this help. Second, as noted above, ADE has external Solutions Teams conduct reviews of underperforming schools' needs assessments and school improvement plans. Third, ADE staff ASSIST Coaches provide general assistance to underperforming schools through monthly meetings with principals and staff and by acting as their liaison to ADE regarding questions and resources.

Best practices also indicate that external assistance should be tailored to direct more resources to the lowest-performing schools. According to school improvement officials in Kentucky and South Carolina, these states provide varied levels of assistance simultaneously. The schools that are particularly weak in these states receive the most intensive assistance. In contrast, while ADE provides a more intensive level of assistance to failing schools, this

ADE requires needs assessments and improvement plans and supports schools' capacity building.

assistance does not occur at the same time as work done by ASSIST Coaches in underperforming schools. This is because the state intervention program does not assist schools until they have been labeled as underperforming for three consecutive years, meaning that they could be relabeled as failing schools. However, ADE could better meet best practices by providing more intensive assistance to particularly weak underperforming schools, and by providing assistance that is specialized to meet the needs of schools (see pages 16 through 17).

- **Monitoring and evaluation of school progress**—The fifth element of school improvement discussed by literature is monitoring and evaluating school progress in the implementation of the plan, which is partly a responsibility of the State. ASSIST Coaches provide monitoring and evaluation by maintaining logs of contacts with schools and documentation from the school of actions related to implementation of the improvement plan. However, ADE's level of monitoring and evaluation does not meet best practices as discussed in literature (see page 17 through 18).

## Guidance needed for improvement plans

Although Arizona follows recommendations from Arizona literature and common practices in requiring underperforming schools to develop School Improvement Plans (ASIPs), ADE's training to have schools complete ASIPs and its review process can be improved. ADE can improve its current training for schools on ASIPs by providing more specific examples of ASIPs emphasizing ADE criteria. Additionally, ADE needs to implement a process in which ASIPs assessed as unsound must be further revised by schools and then given an additional review by an ADE supervisor.

Schools that have been classified as Underperforming under the state accountability system must complete ASIPs for submission to ADE. By statute, school ASIPs must be submitted to ADE within a 90-day period after being classified as Underperforming.<sup>1</sup> The ASIP is then reviewed during a site visit by a Solutions Team, which makes recommendations and findings based on the information in the ASIP and the team's observations at the site visit.

The elements in the ASIP templates include demographic and achievement data, a needs assessment with responses to critical questions regarding the needs assessment, an action plan with goals and implementation strategies or action steps, methods of monitoring or evaluating the implementation, and timelines.

**ASIP quality could be improved**—Auditors' review of several ASIPs found that they could be improved in several key areas. Auditors reviewed six randomly selected plans from 2004-05 and 2005-06. Additionally, ADE provided two

State statute requires ASIPs.

<sup>1</sup> A school designated as Underperforming that has not submitted an ASIP by the required due date forfeits its receipt of monies from the Classroom Site Fund for every day that the ASIP has not been received by ADE plus 90 days. The Classroom Site Fund is mandated by A.R.S. §15-977 and was established with the passage of Proposition 301. A.R.S. §15-977 designates 60 percent of the Fund to be used for purposes related to teacher pay.

examples of poor and adequate ASIPs based on its key criteria for the plans, including specificity of goals, specificity of implementation strategies or action steps, timelines, and use of data for quantifying goals and monitoring action steps. Based on this review, auditors found that ASIPs could be improved in areas such as the specificity of data in its goals, the specificity of personnel responsible for implementing improvement strategies, and the timelines to complete action steps. In one example, an ASIP from the 2004-05 academic year included student performance data from the AIMS test, but did not quantify the percentage increase by which it hoped to improve the student scores in the next test. Several ASIPs failed to list specific personnel responsible for action steps, but instead listed general groups such as teachers or department heads and administrators, and in one case, administrators, staff, and community. Further, auditors identified some ASIPs whose timelines to complete action steps were not more specific than a school year. However, an ADE school improvement official stated that it would be appropriate to measure implementation more frequently, perhaps on a quarterly basis. Due to these differences, it is important that ADE look for ways to help schools create better-quality ASIPs and assist in improving ASIPs when necessary.

**ADE could improve its current program for training schools on how to prepare ASIP**—Although ADE provides some voluntary ASIPs training workshops for school staff, auditors found that the current training could be improved. Training materials lacked complete examples of ASIPs, and there were few examples of the specific elements that a plan should contain. Trainers also lacked a standard protocol for the presentation. ADE could improve its training program to add more examples of specific, quantifiable goals and action steps in ASIP. Additionally, staff should use a standard protocol for presenting training to ensure that all schools in the training workshops have access to the same information.

**ADE should ensure that unsound ASIPs are appropriately revised**—ADE does not have a process to ensure that unsound ASIPs are revised and corrected, although Solutions Teams assess ASIP quality during their on-site reviews of underperforming schools. However, if schools have only poor ASIPs to provide direction, improvement may be more difficult. The need for schools to have improvement plans for guidance has been stressed in the literature. In those cases where Solutions Teams have found unsound ASIPs, ADE should review whether the school subsequently takes steps to revise and improve the plan. While conducting such a review is important, it is also important to conduct it in a timely way. An official with the School Improvement program stated that 45 days is a sufficient length of time for schools to revise their ASIPs. Therefore, ADE should require that schools whose ASIPs were found by the Solutions Team to be unsound submit a revised ASIP no later than 45 days after the Solutions Team has submitted its ASIP review. As of June 2006, ADE had begun creating a draft set of procedures for reviewing unsound ASIPs, including a requirement that schools submit revised ASIPs to ADE within 45 days.

ASIP training is not standardized and lacks complete examples of ASIPs.

## ADE provides technical assistance but could better meet best practices

ADE provides some technical assistance through ASSIST Coaches, but this assistance does not meet best practices in two areas—providing intense assistance to particularly weak schools and providing specialized assistance to address underperforming schools' greatest needs. ADE provides technical assistance through its ASSIST Coaches, who give general assistance to underperforming schools on at least a monthly basis. However, while ADE has limited School Improvement funding, it could better follow best practices for the intensity of assistance by instituting a pilot program that provides a full-time, on-site expert at some particularly weak schools. In addition to instituting a pilot program, ADE could better use its resources by offering more specialized assistance to schools that targets underperforming schools' areas of greatest need.

### ADE provides general technical assistance through ASSIST

Coaches, who are ADE staff—Six ASSIST Coaches are assigned to work with schools that are classified as Underperforming under Arizona Learns, of which there were 123 in academic year 2004–2005. ADE assigns coaches to every underperforming school following the review of the school's improvement plan by a Solution Team, although schools are not required under statute to use them. According to ADE officials, coaches are expected to work collaboratively with underperforming schools to help them improve instead of dictating how they must go through this improvement process. A coach will take a more directive approach if a school is still labeled Underperforming for a second year. Coaches have a school caseload according to region and travel distance to schools, and they are expected to keep monthly contacts with schools through meetings and phone calls. Assistance provided by the coach includes activities such as providing teachers information about integrating technology and classroom management, identifying ADE or district resources available to schools, and promoting activities that are coordinated with the school's improvement plan. Further, coaches may require schools to provide written documentation periodically on the completion of action steps for the ASIP.

### ADE should consider piloting a best practices model of intensive

assistance—ADE could better meet best practices by instituting a pilot program to provide intensive, on-site technical assistance to some particularly weak schools. This pilot program could allow ADE to provide a full-time expert who works on-site with administrators and teachers at a school identified by ADE as being among the lowest-performing schools. This would allow ADE to better understand some of the underlying problems and challenges that exist as barriers to school improvement. Additionally, instituting a pilot program would allow ADE to use its resources in a way that better targets the specific needs of its lowest-performing schools. Finally, instituting this pilot program would allow ADE to better meet best practices regarding the evaluation and monitoring of the school's

A pilot program of intensive assistance would allow ADE to better understand underlying problems and challenges at a school.

improvement plan implementation. ADE could use the information gathered through the evaluation and monitoring of its on-site expert to help determine whether the pilot program could be expanded to other schools.

In contrast to Arizona, some other states, such as Kentucky and South Carolina, provide on-site assistance targeted to weaker schools. For example, Kentucky assigns an expert, or “highly skilled educator,” to work 80 percent of his or her time on-site providing services such as staff development presentations, classroom observations, demonstration lessons, grant writing, and tutoring. The expert may be assigned to the school for up to 3 years. Moreover, South Carolina assigns full-time specialists to work directly with principals and teachers at the state’s lowest-performing schools. According to a South Carolina official, schools may receive assistance for up to 3 years.

ADE should consider offering more specialized assistance—In addition to considering a pilot program involving intensive assistance, ADE should also consider providing more specialized assistance to all underperforming schools. According to ADE, ASSIST Coaches periodically provide some specialized assistance when requested by other ASSIST Coaches. Additionally, ADE’s Best Practices Academies help connect teachers and administrators from underperforming schools with experts in areas of need. However, these experts cannot tailor their presentation to the needs of each school. ADE could better match expert assistance to the needs of schools by assigning ASSIST Coaches to schools whose primary needs match the coach’s areas of expertise. When auditors interviewed eight administrators of underperforming schools, two of them felt that more specialized assistance would be useful. Specific areas where ADE could provide more specialized assistance are in improving teacher quality and improving administrative quality. An ASSIST Coach could address teacher quality by helping teachers to create lesson plans that align with state standards or serving as a mentor to demonstrate best practices in classroom instruction. Additionally, coaches with administrative expertise could assist principals with development of good administrative practices, such as ensuring that information teachers learn is implemented in the classroom.

## Monitoring and evaluation could be improved

ADE’s ASSIST Coaches perform some monitoring and evaluation of schools’ progress in implementing their ASIPs, but these efforts could be improved to meet best practices. According to ADE, ASSIST Coaches keep ongoing logs of their encounters with schools and any documents obtained from the schools regarding implementation of the improvement plan. However, according to ADE, the information in these logs is not always reviewed by the ASSIST Coaches’ supervisor. Further, according to ADE, the information from the logs is not collected in a standardized way, and is not analyzed to determine whether ADE’s assistance for

underperforming schools could be improved. According to literature, states play an important role in the monitoring and evaluation of school progress. For example, Kentucky's state-level staff receive monthly reports from the highly skilled educators regarding schools they are working with, and a study of 11 states' work with school improvement recommends regular monitoring of school progress by states. ADE could ensure that it meets best practices for the type of information collected by reviewing information obtained in ASSIST Coaches' school logs to determine if additional relevant information, such as achievement data, could be gathered by standardizing the types of information collected. Once ADE has determined that all relevant information is being gathered, ADE should improve its evaluation of its school improvement program by performing an ongoing analysis of this information to determine whether any adjustments to school improvement policies should be made. According to an ADE official, ADE began this process in May 2006 by hiring a researcher who will assist the School Improvement program in assessing the impact of its ASSIST Coaches.



## Recommendations:

1. ADE should improve its ASIP training program for underperforming schools by:
  - a. Providing more examples of specific, quantifiable goals and action steps in ASIPs, and
  - b. Using a standard protocol for presenting training.
2. ADE should require that schools whose ASIPs were found to be unsound submit a revised ASIP no later than 45 days after the Solutions Team has submitted its statement of findings for the ASIP.
3. ADE should consider instituting a pilot program that would provide full-time, on-site experts to underperforming schools that are particularly weak.
4. ADE should consider providing underperforming schools with more specialized assistance through its ASSIST Coaches.
5. ADE should review information obtained in ASSIST Coaches' school logs to determine if additional relevant information, such as achievement data, could be gathered by standardizing the types of information collected.
6. Once ADE has determined that all relevant information is being gathered, ADE should improve its evaluation of its School Improvement program by performing an ongoing analysis of information to determine whether any adjustments to school improvement policies should be made.



# FINDING 2

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## Additional monitoring needed to assess efforts to improve participation in tutoring programs

Increased monitoring is needed to assess the efforts to increase participation in both the state- and the federally funded tutoring programs. Both programs are aimed in whole or part at improving the performance of students who are at underperforming schools, but both have low participation rates. The Board has made changes to the state program to increase participation, such as increasing the amount of tutoring time available and increasing tutor pay. ADE should continue to monitor the participation rate and, if necessary, work with the Board to increase program participation. Additionally, ADE should improve its monitoring of tutors' performance in both programs.

## Few eligible students receive state-funded tutoring

In Arizona, students who attend a school categorized by the Department as Underperforming or Failing and those students who have failed one or more portions of the AIMS test may receive free tutoring. However, fewer than 2 percent of the eligible students received tutoring in the fall 2005 semester.<sup>1</sup> Due to the program's low participation rate, which school administrators attributed to barriers such as the limited number of tutoring hours allowed and insufficient tutor pay, the State Board of Education recently approved significant changes to the program. For example, the Board increased tutor pay and broadened the way in which tutors are allowed to demonstrate student achievement. However, to help ensure increased participation and program accountability, the Department should monitor the program's participation rate and consider implementing additional measures for ensuring tutor performance and student achievement.

Free state tutoring is available for eligible students.

<sup>1</sup> According to ADE, for the fall 2005 semester, the population of students eligible for tutoring was restricted to juniors and seniors failing one or more portions of the AIMS test. Of 55,694 students eligible for fall tutoring, 763 participated. The spring 2006 semester includes tutoring for K-12 students attending underperforming or failing schools.

State tutoring program is for low-performing schools and students needing to pass AIMS—Administered by ADE, the failing schools tutoring fund/tutoring program was established by A.R.S. §15-241(M) in June of 2000 and became effective in November of 2000 when voters approved a sales tax increase to provide funding to implement the tutoring program. This program provides tutoring to eligible K-12 students and juniors and seniors needing to pass the AIMS test. Students receive one-on-one or small group tutoring in the areas of reading, writing and math.<sup>1,2</sup> The Board requires that tutors be highly qualified teachers, which includes holding a bachelor's degree, having full state certification, and demonstrating subject matter competency. However, if a highly qualified teacher is unavailable to provide tutoring, the district may apply for an exception.<sup>3</sup> ADE is responsible for administering and overseeing the tutoring program as established by statute and the State Board of Education. For example, ADE tracks and ensures the payment of tutors and participating students' academic improvement and provides information to school districts on program criteria.

State tutoring program has low participation—Based on information provided by ADE, as of fall 2005, the state tutoring program reached fewer than 2 percent of the over 55,000 eligible students, and as of April 30, 2006, the tutoring fund had in excess of \$6.7 million available to provide tutoring for eligible students. As a result of this low participation, the Board met in December 2005 and made significant modifications to the program to encourage participation. According to the minutes of the board meeting, members were concerned that participation was less than expected and a significant number of failing students were not being reached by the program. As a result, board members met with ADE staff and representatives from some school districts to develop a proposal for modifications to the program to encourage greater tutor and student participation. Barriers to participation were identified, such as an insufficient amount of time allotted for student tutoring, insufficient tutor pay, and the requirement of tutors having to return tutoring funds if student achievement failed to show progress.

Changes to state tutoring program may increase participation, but monitoring is needed—In December 2005, the Board made significant changes in an attempt to improve the substance of the program and remove barriers to both student and tutor participation. The Board made the following changes to the tutoring program:

- **Tutoring program hours increased**—One change to the tutoring program was increasing the maximum number of hours that students can receive tutoring. Originally, the program provided a student with a maximum of 9 hours of

1 Tutoring group size maximum is five students to one tutor.

2 In 2005, A.R.S. §15-241(Q) was amended to expand the tutoring eligibility to include students who have failed one or more portions of the AIMS test required for high school graduation.

3 In fall of 2005, the Department, through the State's Enterprise Procurement Office, contracted with two outside providers to provide tutoring services. The outside providers are also required to have their tutors be highly qualified teachers and may apply for exceptions.

The state tutoring program has undergone significant changes in order to remedy low participation.

tutoring. However, according to ADE, comments from the school districts indicated that 9 hours were not enough to effect significant improvements in student performance. The program now provides up to 90 hours for seniors and 75 hours for juniors needing to pass the AIMS test. The program also provides all K-12 students attending a school designated by the State of Arizona as Underperforming or Failing with 30 hours of tutoring (see Introduction and Background, page 5, for description of school performance categories).

- **Attracting greater student participation**—The Board also made changes to encourage greater student participation. For example, the Board approved students' ability to earn high school academic credit for some AIMS tutoring. According to an ADE program staff person, because of the significant increase in hours of the tutoring session, the school district may authorize credit to students for their attendance. The Board also emphasized that tutoring during the school day is acceptable, as long as it is supplementing and not replacing the student's academic classes.
- **Attracting greater tutor participation**—The Board also made changes to both tutor pay and the way in which tutors must demonstrate student progress. Specifically, the Board increased tutoring pay from \$30 to \$40 an hour. According to information presented to the Board by ADE staff at its December 2005 meeting, the \$30 per hour rate was insufficient to attract highly qualified teachers.

Additionally, the Board eliminated the requirement that tutors use a pre-test and post-test to show that a student has academically improved, giving greater latitude to the provider on how to demonstrate student progress. The tutor now is required only to answer a yes or no question indicating whether a student has academically improved and to state the measurement used. However, Laws 2006, Ch. 266, §1 will now require that the State Board annually review the academic performance levels of tutors and gives the Board authority to terminate the tutor if he or she fails to meet their state level of academic improvement.

During the December 2005 board meeting, ADE was also charged to improve communication regarding details of the tutoring program. Specifically, ADE needs to clarify: 1) how tutors may demonstrate academic progress; 2) tutoring during the school day is acceptable so long as it is supplementing, not supplanting, educational services; 3) there is an exception for schools that are unable to find "highly qualified" tutors; and 4) AIMS tutoring is available to high school juniors and seniors who have not passed one or more sections of the test. Therefore, ADE should improve communication with schools and districts regarding details of the state tutoring program. Although significant changes have been made to the tutoring programs, it is too soon to tell whether these changes have significantly increased participation. Therefore, ADE should continue to monitor program participation.

ADE should improve communication with schools and districts regarding details of the state tutoring program.

Better monitoring of student performance in state tutoring program is needed.

Oversight of student performance criteria in state-funded program is minimal—Some of the changes the Board made to increase participation have reduced the program’s tutors’ accountability. By giving tutors greater latitude on how to show student improvement, it is the tutor, in consultation with the parent, who solely determines the skills to be studied and the performance criteria that the student must meet. Further, tutors are now only required by ADE to answer whether a student improved and the method of assessment for determining that improvement. Though these criteria can be monitored by the school principal, such oversight is not required. However, without some monitoring there can be little assurance that tutored students are reaching an appropriate level of academic improvement or that tutors are spending the amount of time reported with the students. Further, since tutors can now be terminated if students fail to obtain skills outlined in the tutoring contract, tutors may have an incentive to set performance goals that are inappropriately low for their students. Therefore, the ADE should take the following additional steps to ensure greater program accountability:

- **Conducting limited audits of contracts**—Although the tutoring program is currently staffed by only one person, the ADE should consider periodically conducting a random audit of a small portion of tutor files to review whether the principals are assessing the reasonableness of the agreed-upon goals and whether the goals are being achieved. ADE officials have acknowledged the need for increased program accountability and requested an additional position to staff the program.
- **ADE should study additional steps**— Since the Board enhanced the program by dramatically increasing the number of tutoring hours available per student from 9 hours to 90 hours and increased the per-hour pay that tutors receive, ADE should take additional steps to ensure the agreed-upon level of student progress is appropriate for each specific student. Specifically, in conjunction with its study of ways to implement the requirement of Laws 2006, Ch. 266, §1 [A.R.S. §15-241(Q)] regarding the possible termination of tutors by the State Board of Education, ADE should also study ways to ensure that student performance criteria are reasonable, including whether it could request that the Legislature provide ADE with the authority to require that principals review the reasonableness of tutoring goals.

Financial controls over tutor payment are insufficient—ADE also lacks sufficient financial controls over tutor payment. At the discretion of the district, the tutor can be paid directly by ADE or the district can apply to ADE for estimated funds necessary to pay tutors.<sup>1</sup> For either type of payment, the tutor uses the state tutor fund online system to register students and enter session information. This system is how ADE calculates how much to reimburse the district or tutor. According to an ADE official, it does not have a process in place to ensure that the hours a tutor reports is the same number that was actually worked; payment is

ADE does not have a process in place to review and approve the hours a tutor reports.

1 Outside tutoring providers are paid directly by ADE.

instead based on the tutor's self-reported data. However, ADE could, in conjunction with studying ways to ensure that student performance criteria is reasonable, also study ways to ensure that the hours submitted to ADE under those contracts are accurate.

## Federally funded tutoring should be better monitored

In 2002, the No Child Left Behind Act (NCLB) created a free federally funded tutoring program through Supplemental Education Services (SES) for schools that have a high percentage of their student population living under the federal poverty line and are attending a school failing to meet adequate yearly progress. The ADE, as required by the federal government, promotes the federal tutoring program and encourages participation. However, similar to the state program, the federal program also has a low participation rate, and barriers exist that are outside the control of the ADE. However, the Department is required by the federal government to evaluate tutoring providers and improvements that could be made.

### Federal tutoring program is for schools failing to meet AYP—

Established in 2002 through NCLB, districts are required to set aside up to 20 percent of their Title I funding to provide tutoring services.<sup>1</sup> In Arizona, all K-12 students attending a Title I school in its second year of School Improvement for failing to meet adequate yearly progress are eligible for tutoring services. Unlike the state program, private providers such as nonprofit or for-profit entities are not required to meet the highly qualified teacher standards. Of the 32 SES providers approved for 2005-2006, 30 are private sector providers. ADE is responsible for approving, evaluating, and removing poorly performing providers. ADE also helps districts encourage participation by disseminating information and conducting periodic meetings and workshops. Other responsibilities, such as identifying eligible students and funding the program, are performed by the participating districts and schools.

ADE is responsible for approving, evaluating, and removing poorly performing tutors who receive federal Title I funding.

### State promotes SES tutoring program, but there are barriers to participation—

In addition to approving and reviewing providers, ADE also promotes participation in the federal tutoring program. Based on interviews with education staff in Massachusetts, Pennsylvania, and Illinois, Arizona's efforts are comparable. For example, a staff person in Massachusetts reported encouraging districts to send out letters to parents, conducting conferences and informational meetings regarding Title I, and providing SES information on the Massachusetts Department of Education Web site. Similar to these other states' SES programs, ADE has taken several steps to provide information and encourage participation in the SES program. For example, ADE provides SES tutoring information on its Web site, such as the federal law and guidance for the program and listings of program providers. Additionally, ADE provides tutoring provider lists and updates to the school districts, encourages district promotion of the program, and conducts

ADE promotes the federally funded tutoring program appropriately.

<sup>1</sup> Title I schools are identified based on a high percentage of the student population living at or below the poverty level.

periodic meetings and workshops. Based on the review of guidance documents authored by the U.S. Department of Education, the Department's efforts appear to be in-line with the federal guidelines for program promotion.

Although ADE makes efforts to provide information and increase participation, barriers to program participation still exist. According to an ADE official, a major barrier to program participation involves student transportation. SES tutoring is provided after school hours and mostly by private sector providers at off-campus locations. This becomes a significant barrier as the families of the children targeted by the program often have financial limitations that impact the availability of transportation to and from tutoring. The lack of adequate transportation was also mentioned as a barrier by education department staff in Pennsylvania. Additionally, other tutoring programs compete with the SES tutoring program. For example, of the 54,356 students eligible for SES tutoring, 21,500 students are also eligible for the state tutoring program. The state tutoring program also offers more advantages to participation, such as tutoring during the school day and tutoring by highly qualified teachers. Additionally, other programs are available, such as tutoring through the 21st Century Community Learning Center Grant. According to an official of one Arizona district, of the two SES-eligible schools, no students participated in the SES program because of participation in other tutoring programs.

State required to approve and evaluate providers, but additional steps can be taken—Although ADE has taken steps to assess SES provider effectiveness, additional steps can be taken. According to federal requirements, the State is required to approve, evaluate, and withdraw approval of providers who fail to contribute to increasing the academic proficiency of students. However, ADE has only recently begun taking steps to assess provider effectiveness in the form of provider and district surveys. In December 2005, ADE sent out surveys to both providers and districts. The surveys requested information such as the frequency of student progress reports, adequacy of information, and promptness of invoice and payment. However, of the 57 school districts receiving the survey that could help ADE assess effectiveness, only 15 district surveys were returned. Further, of the 15 districts responding, 6 reported zero students enrolled in the program. Therefore, ADE should take steps to improve the response rate of participating school districts in order to more effectively assess provider effectiveness.



## Recommendations:

1. ADE should continue to monitor program participation in the state tutoring program.
2. ADE should implement its requirement from the December 2005 board meeting to take steps to improve communication with both schools and districts regarding the state tutoring program.
3. ADE should study ways to ensure that student performance criteria are reasonable and that hours reported by tutors are accurate, including whether it could request that the Legislature provide ADE with authority to require principals to provide this assurance.
4. ADE should randomly audit the records of tutors in the state tutoring program to ensure the reasonableness of the criteria by which student achievement is being assessed.
5. ADE should take steps to improve the response rate of surveys sent to school districts that participate in the federal tutoring program in order to more effectively assess provider effectiveness.



# OTHER PERTINENT INFORMATION

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Auditors developed information on the comparability of student performance in Arizona to student performance in other states. Arizona student performance on state proficiency tests cannot be reliably compared to performance by students in all other states since curriculum standards are not the same for all states. Similarly, Arizona's progress toward full proficiency under No Child Left Behind (NCLB) cannot be compared to the progress made by all other states since their progress toward full proficiency may be measured differently. However, one test that allows Arizona student performance to be compared to student performance in all other states is the National Assessment of Educational Progress (NAEP) test.<sup>1</sup> NAEP is a test taken by a sample of American students to test their knowledge and skills in reading, mathematics, science, and writing. For the 2004-2005 academic year, NAEP results show Arizona students scoring below the national average in reading and mathematics.

## Interstate performance comparisons vary in reliability

It is misleading to compare the performance of Arizona's students on the AIMS test to the performance of students on state assessments in other states. The AIMS test measures achievement based on Arizona's academic standards. In contrast, students in other states take state assessment tests that are based on the standards of their state. Since standards can vary from state to state, student performance under Arizona academic standards is not directly comparable to student performance in other states.

Similarly, state achievement of annual measurable objectives (AMOs), which are required under NCLB, is generally not directly comparable with AMO achievement made in other states. AMOs are a series of interim goals set by the state to measure progress toward full student proficiency in reading or language arts, and mathematics by 2014. AMOs set the required percentage of a state's students who must rate proficient on state assessment tests for each year. This provides a comparison of student performance in a given year to a fixed target. Federal law requires that performance relative to this target should be used to determine whether

Interstate comparisons of student performance are not always reliable because standards vary from state to state.

<sup>1</sup> According to an ADE official familiar with NAEP, the NAEP offers some interstate comparability, but it is not comparable with AIMS. While the levels set for proficiency on NAEP are based on expectations of student performance at each grade level, these standards for performance do not necessarily align with Arizona's curriculum standards for grade levels. Therefore, an Arizona student could be proficient on one test and not on the other.

**Table 4:** AMOs for Arizona, New Jersey, and Utah As of 2005

Arizona	New Jersey	Utah
Yearly Goals in Reading/Writing and Math	Yearly Goals in Language Arts and Math	Yearly Goals in Language Arts and Math
<ul style="list-style-type: none"> <li>• Grade 3</li> <li>• Grade 5</li> <li>• Grade 8</li> <li>• Grade 10</li> </ul>	<ul style="list-style-type: none"> <li>• Grade 4</li> <li>• Grade 8</li> <li>• Grade 12</li> </ul>	<ul style="list-style-type: none"> <li>• Grades 3—8</li> <li>• Grade 10</li> </ul>
		Additional Yearly Goals in Math
		<ul style="list-style-type: none"> <li>• Grades 11 and 12</li> </ul>

Source: U.S. Department of Education Web site, *2005 State of Arizona Consolidated State Application Accountability Workbook*; *2005 State of New Jersey Consolidated State Application Accountability Workbook*; and *2005 State of Utah Consolidated State Application Accountability Workbook*.

a school or district makes AYP. However, the AMOs can be different for different states, because the federal government gives states some latitude to set goals appropriate for each state. For example, New Jersey has AMOs for the reading and math performance for 12th-graders, while Utah’s AMOs for 12th-graders concern only their math performance (see Table 4). Additionally, states determine whether AMOs are met by comparing them to student performance on assessment tests. Moreover, each state’s assessment test is based on academic standards unique to that state. Consequently, this complicates any attempt to determine the relative progress states are making to achieve full proficiency.

**Arizona Student NAEP Participation for 2005 Assessments<sup>1</sup>**

4th-grade math	2,900
4th-grade reading	2,800
8th-grade math	2,800
8th-grade reading	2,800

<sup>1</sup> National Center for Education Statistics

While comparing results on state assessment tests, such as AIMS, will yield misleading results, one performance evaluation that provides better comparability is the National Assessment of Educational Progress (NAEP), which is a nationally administered test. The NAEP is known as the “national report card” because it is the only measure of student achievement in the United States that can compare student performance in all other states.

Since 1969, NAEP tests have been conducted periodically in subjects such as reading, mathematics, science, and writing. NAEP is a test taken by a sample of American students, testing knowledge and skills in the nation as a whole, in each participating state, and in different demographic groupings. At the state level, a math and reading assessment is administered biennially to a sample of 4th- and 8th-graders nation-wide who agree to take it. According to an ADE official familiar with NAEP, each state must have an 85 percent participation rate in its original assessment sample in order to have its results reported. However, during the last assessments, no state had a participation rate under 85 percent. State results for NAEP assessments are currently reported for public school students only and are broken down by several demographic groupings of students. Additionally, comparability of student performance is facilitated by using the same performance classifications, such as “proficient,” for each state. Thus, states can compare their results against other states and the nation as a whole (see Table 5).

**Table 5:** Percentage of Students Considered Proficient or Above According to NAEP Academic Year 2004-2005

	Arizona	National Average
<b>Math</b>		
4 <sup>th</sup> -Graders	28%	35%
8 <sup>th</sup> -Graders	26%	28%
<b>Reading</b>		
4 <sup>th</sup> -Graders	24%	30%
8 <sup>th</sup> -Graders	23%	29%

Source: Auditor General staff analysis of information from the National Center for Education Statistics Web site as of February 24, 2006.

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♦ continued

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# AGENCY RESPONSE





State of Arizona  
Department of Education

Tom Horne  
Superintendent of  
Public Instruction

June 23, 2006

Ms. Debra K. Davenport, CPA  
Auditor General  
Office of the Auditor General  
2910 North 44<sup>th</sup> Street, Suite 410  
Phoenix, Arizona 85010

Dear Ms. Davenport:

The Arizona Department of Education is providing the enclosed response to the Auditor General's performance audit for the following two areas:

- School Improvement Program
- State & Federally Funded Tutoring Programs

We appreciate your work on this performance audit, your consideration of our previous comments and suggestions and your acknowledgement of the quality and variety of work already provided by the Arizona Department of Education.

Please feel free to call me at (602) 364-2339 if any additional information is needed.

Sincerely,

Margaret Garcia Dugan  
Deputy Superintendent

Enclosure



State of Arizona  
Department of Education

Tom Horne  
Superintendent of  
Public Instruction

ADE would like to define the term ASSIST: Arizona Sustained Supports for Implementing Solutions Teams.

**ADE GENERAL COMMENT**

While ADE welcomes recommendations that will lead to improved supports for struggling schools, it does not believe that the Auditor General's Report captures the uniquely proactive, preventative nature of A.R.S. §15-241 (AZ LEARNS) in relation to other states' systems of accountability.

When the School Effectiveness Division was established in 2003, ADE personnel researched support systems in all of the states the Auditor General studied, as well as a number of additional states. Under AZ LEARNS, a school can be subject to State Intervention within 24 months of its first Underperforming designation. State Intervention may include assignment of a turnaround principal or a principal mentor, ATLAS teachers, and other on-site specialists. Under the federal NCLB accountability system, which is the basis of all states with which ADE has collaborated, such measures do not occur until the fourth year of failing to make Adequate Yearly Progress (AYP), the year known as Corrective Action. Frequently, these measures are not implemented until the sixth year of failing to make AYP, the year known as Restructuring Implementation.

Comparing just ADE's School Improvement processes with identified "best practices" gives an incomplete picture. Only when School Improvement processes are viewed in tandem with State Intervention processes does the extent to which ADE has implemented AZ LEARNS in an aggressive, proactive, and preventative manner become evident.

**ADE COMMENTS REGARDING FINDING 1: PAGES 11 – 20**

**Finding 1, Recommendation 1**

ADE should improve its ASIP training program for Underperforming schools by:

- a. Providing more examples of specific, quantifiable goals and action steps in ASIPs, and
- b. Using a standard protocol for presenting training.

**ADE Response**

*The finding of the Auditor General is agreed to and the audit recommendation will be implemented.*

- a. In SY 2005-2006, ADE developed and implemented an online, web-based school improvement plan. Based on feedback from users and focus group pilots, the 2006-2007 version has been substantially enhanced. The planning tool automatically populates data about the students served by the school and their academic achievement. This better prepares the school improvement team to thoroughly review data before establishing goals. Each goal's Action Plan is developed on a single screen, making it a more effective communication tool for staff, students, parents, and community members. (See Figure 1.) The tool bar for this screen will include a reminder to verify that each goal is S-M-A-R-T (Specific and strategic, Measurable, Attainable, Results-oriented, and Time-bound). A Sample Action Plan, with examples of all required components, will also be added to the toolbar.
- b. Both directors of School Improvement (AZ LEARNS and NCLB) have begun developing and will implement a common training protocol for using the online planning tool, with a greater emphasis on highly focused S-M-A-R-T goals. Staff from both units will co-facilitate the trainings, to ensure consistency.

**Finding 1, Recommendation 2**

ADE should require that schools whose ASIPs were found to be unsound submit a revised ASIP no later than 45 days after the Solutions Team has submitted its statement of findings for the ASIP.

**ADE Response**

*The finding of the Auditor General is agreed to and the audit recommendation will be implemented.*

In April, 2006, the directors of both School Improvement units collaborated to establish a common protocol for situations in which the Solutions Team determines that an improvement plan is not sound. (See Figure 2.) Solutions Team members and leaders will receive additional training as to what constitutes a “sound” plan.

**Finding 1, Recommendation 3**

ADE should consider instituting a pilot program that would provide full-time, on-site experts to Underperforming schools that are particularly weak.

**ADE Response**

*The finding of the Auditor General is agreed to and the audit recommendation will be implemented.*

ADE believes that all schools require differentiated levels of support, and does provide full-time, on-site experts for Failing schools. ADE agrees to again research the criteria used by Kentucky to identify a school as being particularly weak. This information will inform the decision as to whether to institute a pilot program for certain Underperforming schools, as recommended.

As ADE developed the framework of support for Underperforming schools, it researched the processes of other state agencies, including Florida, Kentucky, Massachusetts, and North Carolina. ADE’s framework is based on the premise that these schools are indeed capable of sustaining improved academic achievement, given additional guidance and expert assistance. Numbers indicate that with very few exceptions, the Solutions Team/ASSIST Coach framework helps Underperforming schools increase their own capacity to sustain higher performance without developing dependency on external supports. In October 2003, 55 schools were designated as first year Underperforming and were required to develop school improvement plans. In the spring of 2004, these schools received Solutions Team visits with follow-up ASSIST Coach support. By October 2004, only 11 of the schools entered a second year of Underperforming status. They continued to receive services from ASSIST Coaches. By October 2005, only two of these schools remained Underperforming. At that point, they began receiving the more prescriptive assistance of the State Intervention Section, including full-time, on-site experts, as recommended.

**Finding 1, Recommendation 4**

ADE should consider providing Underperforming schools with more specialized assistance through its ASSIST coaches.

**ADE Response**

*The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.*

ADE agrees that Underperforming schools benefit from highly skilled ASSIST Coaches, and remains committed to on-going skill development in areas that reflect the needs of schools currently receiving services. Virtually all Underperforming schools need and are receiving coaching specific to curriculum development, use of data, and improving communication. If ADE were to employ a specialist in curriculum alignment, that individual would need to travel to all 118 Underperforming schools, as would the specialist in data, etc. An important consideration is that each individual school site has multiple needs, but cannot effectively respond to multiple coaches.

ADE created the Best Practices Program to ensure that Underperforming schools have access to nationally recognized experts in specific areas of need. Solutions Team findings determine the content of the Academies. ASSIST Coaches connect the schools they serve with the appropriate Academies, waive the registration fee, attend the Academies with the school teams, and provide the follow-up needed to ensure implementation.

ADE believes that a more effective method of addressing this finding is to increase the number of FTEs with a solid, overall background in school improvement, because the current reality is that just five FTEs and one Director are serving 118 schools. The resulting caseload is very challenging, and retaining competent coaches under these working conditions has been difficult.

**Finding 1, Recommendation 5**

ADE should review information obtained in ASSIST Coaches' school logs to determine if additional relevant information, such as achievement data, could be gathered by standardizing the types of information collected.

**ADE Response**

*The finding of the Auditor General is agreed to and the audit recommendation will be implemented.*

The ASSIST Coach team has already determined that during the summer of 2006, coaches will scrutinize, review, and refine all aspects of their protocol for supporting Underperforming schools, including documentation. They will consider requiring that each school's log have a separate section for documentation of progress related to each of the Solutions Team's recommendations. A section of the log may be used for additional documentation that is relevant but not tied to a specific recommendation of the team or a school's goals. It is believed this will not only enhance the usefulness of the logs, but will also help to maintain focus during visits.

**Finding 1, Recommendation 6**

Once ADE has determined that all relevant information is being gathered, ADE should improve its evaluation of its School Improvement program by performing an ongoing analysis of information to determine whether any adjustments to school improvement policies should be made.

**ADE Response**

*The finding of the Auditor General is agreed to and the audit recommendation will be implemented.*

All states with which ADE has collaborated are struggling with how to isolate and evaluate the impact of their support on the performance of schools. While this Report provides no guidance on how to do so, ADE will continue to pursue ongoing performance measures of the impact of its School Improvement framework of support. ADE has previously engaged the University of Arizona and a private contractor in studies, but found that it is difficult to isolate the impact of this program among all the variables in student achievement. The School Effectiveness Division has recently acquired an FTE within the Research and Evaluation unit to support its research needs, most particularly in program evaluation.

**Figure 1**  
**Goal Action Plan within ASIP**

The screenshot shows a web browser window with the following elements:

- Browser Title:** ASIP - Microsoft Internet Explorer
- Address Bar:** https://dapp.ideal.azed.gov/ASIP\_MMVI/ap.php
- Form Content:**
  - STATE GOAL BELOW:** A dropdown menu with options: "Please Select Goal to View/Edit", "Please Select Goal to View/Edit", "Goal 1", "Goal 2", "Goal 3", and "Sample".
  - WHAT DATA SOURCES INDICATE THE NEED FOR THIS GOAL?:** A text input field.
  - INDIVIDUAL RESPONSIBLE FOR OVERSEEING IMPLEMENTATION OF THIS GOAL:** A text input field.
  - WHAT QUARTERLY MEASURE WILL BE USED TO MONITOR PROGRESS ON THIS GOAL?:** A text input field.
  - BENCHMARK DATES: (MM/DD/YY):** A date input field.
  - WHAT RESEARCH-BASED INTERVENTIONS WILL BE PUT IN PLACE TO SUPPORT THIS GOAL?:** A text input field.
  - IMPLEMENTATION DATES: (MM/DD/YY):** A date input field.
  - WHAT PROFESSIONAL DEVELOPMENT WILL STAFF NEED TO IMPLEMENT THESE INTERVENTIONS?:** A text input field.
  - PROFESSIONAL DEVELOPMENT DATES: (MM/DD/YY):** A date input field.
  - WHAT RESOURCES WILL BE NEEDED TO IMPLEMENT THESE INTERVENTIONS?:** A text input field.

Figure 2

## **PROTOCOL FOR REVISION OF ARIZONA SCHOOL IMPROVEMENT PLANS**

### **BACKGROUND**

Arizona schools are required to submit to ADE an *Arizona School Improvement Plan* if they are designated as *Underperforming* under AZ LEARNS and/or if they fail to make Adequate Yearly Progress under NCLB. ADE staff shall provide such schools consistent, focused training in the use of the online planning tool to address the learning needs of their students. Staff shall also provide technical assistance to schools as they write their plans.

ADE views the *Arizona School Improvement Plan* as a dynamic and flexible two-year roadmap for changing instructional practices that will lead to increased student performance. After the original plan has been submitted to ADE, the school should monitor achievement data on at least a quarterly basis and make modifications to the plan as needed.

### **QUALITY ASSURANCE PROTOCOL**

One of the responsibilities of a Solutions Team during its school site visit is to answer the question, “Does the school’s *Arizona School Improvement Plan* appear to be a sound plan for improving student performance?” Team members are trained to look for 3 to 5 targeted goals over a two-year period that:

- specifically address the reason(s) for receiving an Underperforming achievement profile or for not making AYP;
- include the use of targeted assessment(s) to generate data for progress monitoring;
- detail appropriate research-based instructional strategies; and
- identify required professional development.

In cases where the plan is found to be inadequate, the team’s *Statement of Findings* shall clearly identify the components of the plan that need to be revised. It is the responsibility of the assigned ADE School Improvement Coach to oversee revisions to the plan. The coach shall provide technical assistance and guidance as the school leadership works to more closely align its plan to the learning needs of the students. The coach shall keep a record of progress as the school modifies its plan.

An amended plan is to be submitted to ADE within 45 days of the conclusion of the Solutions Team visit.

### **Record of ASIP Revision**

<b>ASIP CHANGE(S) RECOMMENDED BY SOLUTIONS TEAM/ADE COACH</b>	<b>ACTION TAKEN/ RATIONALE</b>	<b>DATE</b>

A School Improvement Program Director (AZ LEARNS or NCLB) shall review each amended plan, comparing it to the recommendations of the Solutions Team. The director shall have the authority to approve the plan as appropriate, or return it to the school with written guidance for further revision.



# STATE AND FEDERAL TUTORING PROGRAM AUDIT

FINDING 2 Additional monitoring needed to assess efforts to improve participation in tutoring programs

## **RESPONSE TO RECOMMENDATIONS**

### **Finding 2, Recommendation 1**

ADE should continue to monitor program participation in the state tutoring program.

#### **ADE Response**

**The finding of the Auditor General is agreed to and the audit recommendation will be implemented.** The ADE continues to collect information on participation in the state tutoring program semiannually. The overall number of students who received tutoring in the Spring of 2006 increased from the fall by more than four times to over 3400. The number of high school participants was three times the fall total. The ADE and the State Board will review the rates of participation by county, district, and school. The ADE oversees the tutor contract process by requiring that the principal or district coordinator to submit the names of the tutors. The program coordinator, then contacts the tutors directly with directions on how to submit signed contract forms and how to enter tutor session data. To ensure that tutors have been approved by the principal or district coordinator, the ADE program coordinator will adjust her procedures for the 2006-2007 year to include verifying the school or district contact.

### **Finding 2, Recommendation 2**

ADE should implement its requirement from the December 2005 Board meeting to take steps to improve communication with both schools and districts regarding the state tutoring program.

#### **ADE Response**

**The finding of the Auditor General is agreed to and the audit recommendation will be implemented.** The ADE has established a variety of communication methods regarding the state tutoring program and will continue to strengthen communication with both schools and districts. The following changes have been made based on the December 2005 Board meeting directions. The program coordinator prepares numerous communications to district and school personnel announcing the various phases of the program – from the initial authorized list of tutors, to the registration of tutors as contractors, to directions for completing the on-line system, to reminders about due dates. All of the high school students who had not passed one or more of the HS AIMS tests received their individual study guides in the fall. The guide contractor conducted training in all counties across the state to familiarize tutors with the guides, so they could be used in tutoring sessions. The program coordinator was invited to present at ADE-sponsored conferences where school staff were informed about the program and where printed materials were made available. *The Arizona Republic* printed articles about the tutoring programs and specifically addressed the distribution of the study guides. The Associate Superintendent of Academic Achievement sent an additional e-mail to all superintendents, charter holders, and principals, requesting that tutoring be aligned to the study guides. A link on the ADE web site under Hot Topics contains information about the program. Superintendent Horne publicized the establishment of an AIMS Hotline in his annual State of Education presentations through out the state in January, which provided the public with a direct connection to information about AIMS testing and tutoring. For the students at underperforming and failing schools who became eligible for tutoring in the Spring semester, ADE staff in the School Improvement and State Intervention Units were enlisted to explain the program and encourage participation at the schools to which they were assigned. The number of participating schools increased to 144, which includes 30 underperforming or failing schools.

In response to the Board's directions from its December 2005 meeting, the ADE revised the cover letter sent to all eligible schools and district superintendents announcing the Spring program. These revisions included:

- changes to the on-line system regarding how student progress was to be demonstrated and recorded,

- clarification that tutoring could be offered during the school day if it did not replace regular instruction,
- outlining the option for exceptions if a school was unable to find tutors who meet the definition of highly qualified, and
- reiterating that juniors and seniors who had not passed one or more sections of the HS AIMS test continued to be eligible along with students at underperforming schools.

The program coordinator's sizeable correspondence with the tutors provides multiple opportunities to respond to concerns in the schools and districts. The ADE has also held an informal focus group in June 2006 at which improvements in communication have been addressed. The group recommended some technical changes to the method of sending e-mails, especially regarding how attachments are handled, that may address some of constraints on districts' systems that can result in missed communications. The recommendations from this focus group will be implemented for the Fall of 2006.

**Finding 2, Recommendation 3**

ADE should study ways to assure that student performance criteria are reasonable and that hours reported by tutors are accurate, including whether it could request that the Legislature provide ADE with authority to require principals to provide this assurance.

*ADE Response*

**The finding of the Auditor General is agreed to and a different method of dealing with the finding will be implemented.** As recognized by the Auditors in this report, numerous barriers to participation in the state tutoring program have been identified and addressed within the confines of A.R.S. § 15-241(Q). An on-line system of data collection was developed to eliminate as much paperwork for tutors as possible. Tutors enter data through a secure portal unique to ADE systems; i.e., the tutor's access is individually determined rather than attached to an authorized school or other entity. Therefore, the system is not designed to allow any direct administrative oversight at the school or district level.

The ADE will study various changes that can be made in the completion of the Certificate of Supplemental Instruction to possibly include verification by the principal. The Certificate of Supplemental Instruction identifies the skills for tutoring as agreed upon by the parent, student, and tutor. Tutors must identify the method(s) of determining how the skills have been mastered for each individual student, as there is no uniform state-wide assessment for measuring progress during tutoring.

Clarification to the program descriptions for the Fall 2006 semester program will include specific directions for maintaining attendance logs and options for measuring student progress. Tutors will be advised that they may choose informal or formal standards –based assessments that have developed by the classroom teacher, the district, or a commercial entity. As professionals who sign a detailed contract, the tutors are expected to report the results accurately through the on-line system. See response to recommendation 4 below.

**Finding 2, Recommendation 4**

ADE should randomly audit the records of tutors in the state tutoring program to ensure the reasonableness of the criteria by which student achievement is being assessed.

*ADE Response*

**The finding of the Auditor General is agreed to and the audit recommendation will be implemented.** The program coordinator is currently limited in the amount of time that can be devoted to monitoring by the volume of communication, correspondence, and administrative tasks required to ensure that the program is operational. The scope of her work includes preparing the forms, documents, and other promotional materials; collecting all of the initial contracts and associated forms for the tutors who will be paid by ADE directly; maintaining a data base of contact information about each tutor; establishing the grant program with ADE Grants Management for those LEAs that are paying their own tutors; coordinating with the IT Division

to develop and troubleshoot the on-line data collection system; responding to a large volume of questions from schools, districts, and the public; meeting with tutors and students in focus groups; and preparing recommendations and responses to the State Board on program improvements. Without additional legislative changes to permit expenditures of State Tutoring funds on state administration activities, an audit of tutors' records would be limited to a desk audit of submitted copies of tutoring contracts. The ADE will submit a decision package to the legislature for the 2007 session requesting authorization to expend State Tutoring funds for personnel who would be able to conduct on-site monitoring, assist with data collection, and continue to improve communication. Such monitoring would include review of the Certificates of Supplemental Instruction (with principal signature, if approved), student attendance logs, and Highly Qualified Teacher exception information.

**Finding 2, Recommendation 5**

ADE should take steps to improve the response rate of surveys sent to school districts that participate in the federal tutoring program in order to more effectively assess provider effectiveness.

***ADE Response***

**The finding of the Auditor General is agreed to and the audit recommendation will be implemented.** As recognized by the Auditors in this report, for the qualifying year 2004-2005, ADE sent surveys out to districts qualifying to offer Supplemental Educational Services (SES) that were not reported in a timely manner. The program coordinator initiated a new preliminary survey for the current year, 2005-06 with the objective of determining how districts applied the tenets of the law, how many students they served, and a breakdown of who these students are. For example, the description of students receiving services was organized into categories such as English Language Learners (ELL), and Special Needs Students (SPED). Also requested were the name and number of commercial providers delivering services and whether or not the services occurred on school grounds. At the same time, a similar survey was sent to each provider of Supplemental Educational Services. In reviewing these latest results, we determined that 99% of the business community responded. 50% of the current districts responded to the new survey increasing their response by 50% over the 2004-05 survey response.

For the future, it is the intent of this office to make a more concerted effort through workshops and newsletters to instruct districts of their obligations under the law to offer SES to eligible students; to increase response time by making new surveys available in real time online in order that respondents' information may be tallied in a more efficient and concise manner, and to improve the evaluation of providers' efficacy by implementing a warning system that will alert providers to adhere to the standards Arizona has set in place for achievement of their students lest the provider be removed from the approved list.

## Performance Audit Division reports issued within the last 24 months

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<b>04-05</b>	Department of Environmental Quality—Water Quality Division	<b>05-04</b>	Department of Economic Security—Information Security
<b>04-06</b>	Department of Environmental Quality—Waste Programs Division	<b>05-05</b>	Department of Economic Security—Service Integration Initiative
<b>04-07</b>	Department of Environmental Quality—Air Quality Division	<b>05-06</b>	Department of Revenue—Audit Division
<b>04-08</b>	Department of Environmental Quality—Sunset Factors	<b>05-07</b>	Department of Economic Security—Division of Developmental Disabilities
<b>04-09</b>	Arizona Department of Transportation, Motor Vehicle Division— State Revenue Collection Functions	<b>05-08</b>	Department of Economic Security—Sunset Factors
<b>04-10</b>	Arizona Department of Transportation, Motor Vehicle Division—Information Security and E-government Services	<b>05-09</b>	Arizona State Retirement System
<b>04-11</b>	Arizona Department of Transportation, Motor Vehicle Division—Sunset Factors	<b>05-10</b>	Foster Care Review Board
<b>04-12</b>	Board of Examiners of Nursing Care Institution Administrators and Assisted Living Facility Managers	<b>05-11</b>	Department of Administration—Information Services Division and Telecommunications Program Office
<b>05-L1</b>	Letter Report—Department of Health Services—Ultrasound Reviews	<b>05-12</b>	Department of Administration—Human Resources Division
<b>05-01</b>	Department of Economic Security—Division of Employment and Rehabilitation Services—Unemployment Insurance Program	<b>05-13</b>	Department of Administration—Sunset Factors
<b>05-02</b>	Department of Administration—Financial Services Division	<b>05-14</b>	Department of Revenue—Collections Division
<b>05-03</b>	Government Information Technology Agency (GITA) & Information Technology Authorization Committee (ITAC)	<b>05-15</b>	Department of Revenue—Business Reengineering/Integrated Tax System
		<b>05-16</b>	Department of Revenue Sunset Factors
		<b>06-01</b>	Governor’s Regulatory Review Council
		<b>06-02</b>	Arizona Health Care Cost Containment System—Healthcare Group Program
		<b>06-03</b>	Pinal County Transportation Excise Tax

## Future Performance Audit Division reports

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Arizona Department of Education—Administration and Allocation of Funds

Arizona Department of Health Services—Behavioral Health Services to the Seriously Mentally Ill in Maricopa County