

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

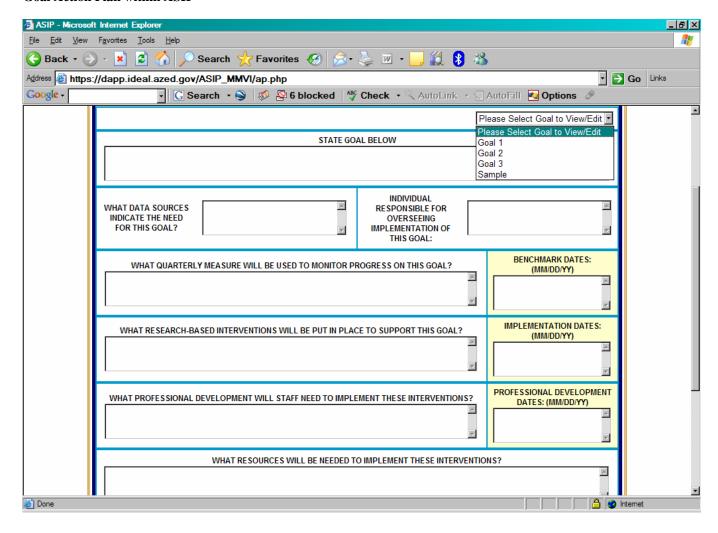
Once ADE has determined that all relevant information is being gathered, ADE should improve its evaluation of its School Improvement program by performing an ongoing analysis of information to determine whether any adjustments to school improvement policies should be made.

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



PROTOCOL FOR REVISON 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

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

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 online 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.