



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

August 8, 2017

The Honorable Diane Douglas  
Superintendent of Education  
Arizona Department of Education  
1535 W. Jefferson Street  
Phoenix, AZ 85007

Dear Superintendent Douglas:

Thank you for submitting Arizona's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide feedback based on the U.S. Department of Education's (Department's) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality, while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of a State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration. Please note that the Department's feedback may differ from the peer notes.

Based on the Department's review of all programs submitted under Arizona's consolidated State plan, including those programs subject to peer review, the Department is requesting clarifying or additional information to ensure the State's plan has met requisite statutory and regulatory requirements, as detailed in the enclosed table. Each State has flexibility in how it meets the statutory and regulatory requirements. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Arizona's consolidated State plan and resubmit it through OMB Max within 15 days from August 7, 2017. If you need more time than this to resubmit your consolidated State plan, please contact your Office of State Support Program Officer, who will work with you in establishing a new submission date. Please recognize that if we accommodate your request for

400 MARYLAND AVE., SW, WASHINGTON, DC 20202  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

additional time, we may be unable to issue a written determination on your plan within the 120-day review period.

Department staff are available to support Arizona in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Arizona's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements. Additionally, the Department can only review and approve complete information. If Arizona indicated that any aspect of its plan may change or is still under development, Arizona may include updated or additional information in its resubmission. Arizona may also propose an amendment to its approved plan when additional data or information are available consistent with ESEA section 1111(a)(6)(B). The Department cannot approve incomplete details within the State plan until the State provides sufficient information.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel  
Acting Assistant Secretary

Enclosures

cc: Governor  
State Title I Director  
State Title II Director  
State Title III Director  
State Title IV Director  
State Title V Director  
State 21st Century Community Learning Center Director  
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths Program

**Items for Additional Information or Revision in Arizona’s Consolidated State Plan**

<b>Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)</b>	
A.4.iv.a: Academic Achievement Indicator	<ul style="list-style-type: none"> <li>• ADE proposes to include performance on science assessments in its Academic Achievement indicator. ESEA section 1111(c)(4)(B)(i)(I) requires that the Academic Achievement indicator only include measures of proficiency on the annual assessments required under ESEA section 1111(b)(2)(B)(v)(I) (i.e., reading/language arts and mathematics); a State may include performance on assessments other than those required under ESEA section 1111(c)(2)(B)(v)(I) (e.g., science) in the indicator for public elementary and secondary schools that are not high schools required under ESEA section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator) or in the School Quality or Student Success indicator for any schools, including high schools.</li> <li>• ESEA section 1111(c)(4)(E)(ii) requires that a State calculate the Academic Achievement indicator by including in the denominator the greater of 95 percent of all students (or 95 percent of students in each subgroup, as the case may be) or the number of students participating in the assessments. Although in its State plan ADE notes that participation rate “will be a factor” in school improvement decisions, the information provided implies that ADE may not be meeting the requirement to calculate the Academic Achievement indicator consistent with the statutory requirement.</li> <li>• In its plan, ADE describes how it will weight points within its Academic Achievement indicator so that “the longer [a school has] taught a student, the more weight the student gets” (i.e. a student who scores proficient on the Academic Achievement indicator and is enrolled in the same school for three years will earn more points for that school than a student who has been enrolled in the school for one or two years). The ESEA requires that each indicator annually measure results for all students and separately for each subgroup of students. ADE has not described how it will calculate the indicator using its proposed student weighting system or how the calculation will measure academic achievement for all students and each subgroup of students.</li> </ul>
A.4.iv.e: School Quality or Student Success Indicator(s)	<ul style="list-style-type: none"> <li>• In its State plan, ADE describes a School Quality or Student Success indicator that it calls a College and Career Readiness indicator (CCRI) for high schools. The State indicates that the indicator will be calculated by permitting each graduating senior to earn up to two points on a variety of different college and career readiness measures and then averaging the scores of all graduating seniors, rather than all seniors. The ESEA requires that each indicator annually</li> </ul>

	<p>measure results for all students and separately for each subgroup of students and allow for meaningful differentiation in school performance across the State. Because ADE has not described how it will calculate this indicator to include all students or how the indicator will allow for meaningful differentiation, it is unclear whether ADE meets the statutory requirements.</p>
A.5: Disproportionate Rates of Access to Educators	<p>In its State plan, ADE provides definitions for ineffective, out-of-field, and inexperienced teachers and references a previously approved educator equity plan that addresses disproportionate rates of access to educators generally. However, ADE does not specifically address schools assisted under Title I, Part A. The ESEA requires a State to describe the extent, if any, to which low income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.</p>