

intervention models provided by the notice. The state offers a number of strategies for turning around schools including emphasizing reading, Education and Career Action Plans, using the Governor's Distinguished Educators Corps, bonuses to Distinguished Teachers, continuation of the Specialists and Liaisons role in schools, after school programs and using the Advanced Placement Incentive Program. The response must supply a plan that includes at a minimum, the goals, activities, timelines and responsible parties. It needs to go further than listing programs. A step-by-step approach toward identifying persistently low achieving schools, providing an intervention process and providing support to teachers and principals, and monitoring the success needs to be developed. The transformation model has been used exclusively in the state's turnaround efforts. It is not clear if any of the school districts have used the transformation model for 50% of their schools.

Total	50	20
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F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	8
(F)(1) Reviewer Comments: (i) The data and narrative support the increase in education support from 53.5% in 2008 to 59.5% in 2009. (ii) An equalized funding formula provides state funds to districts, but does not address high needs schools and districts.		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	24
(F)(2) Reviewer Comments: (i) Arizona does not limit the number of charter schools. The information here indicates that the state is no longer granting new charters. A clarification of this statement would assist the reader in understanding if a limit is being placed on new charters. It appears that the state has an extremely large number of charter schools in operation. As an aid to the reader, it would be helpful to know what percentage of the state's schools are charters. (ii) Title 15, Chapter 1, Article 8 of the Arizona Revised Statutes provides the responsibilities and regulations for charter schools. It provides for periodic review and evaluation, and outlines the requirements for reauthorization or renewal. The charter school authorizers have oversight and administrative responsibility for the charters they sponsor. (iii) Charters are funded in the same way as school districts are funded. (iv) The response does not indicate that funding for facilities is provided. From the information it appears that outside of naming them as public schools or relief from burdensome taxes on non-profit charters that this is not the case. (v) The information here consists of one sentence. It does not indicate how the state enables LEAs to operate innovative, autonomous public schools other than charters. The response is insufficient to determine if these schools are operated independently of LEAs or provide innovative programs.		
(F)(3) Demonstrating other significant reform conditions	5	1
(F)(3) Reviewer Comments: Aside from mentioning a Technology Assisted Project Based Instruction Program, this response provides nothing regarding the laws, regulations or policies to support significant reforms outside of those already contained within the application.		
Total	55	33

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1

Competitive Preference Priority 2: Emphasis on STEM	15	0
Competitive Reviewer Comments: While there is mention of a STEM approach, it is not sufficient to carry out a comprehensive program that would prepare students for advanced study and careers in STEM. Plans to deal with Engineering and Technology are particularly absent. While mathematics and science are mentioned, treatment of an in-depth nature is missing. There are many gaps within the application that the preceding review illustrates. The plan must be strengthened with an approach that infuses STEM subjects throughout the curriculum not simply K-8. It must address the involvement of traditionally underserved students, especially women and minorities, in these courses and offer high quality, rigorous courses designed to prepare students for advanced post-secondary education or careers. Preparing teachers to teach STEM courses must be a priority and professional development, including familiarity with Project Lead the Way Courses, needs to be carefully planned for as part of both the preparation of new teachers as well as developing the skills of veteran teachers.		
Total	15	0

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		No
Absolute Reviewer Comments: There are many gaps in the needed information and in the detail needed to provide a comprehensive approach to the application. For each section, information is needed on goals, activities, timelines and the person/agency responsible for carrying out the plan. Over one-third of the LEAs are listed as not participating and less than a quarter of the teacher union representatives have signed on in support of this application. Additionally, only two letters of support were provided for the application. Many of the key organizations in the state are missing in support of this application. Without the widely-based support of the educational, political, business and other stakeholders in the state, it is difficult to see how a program that is left solely up to the LEAs to implement (with SEA support) will be able to carry out the plan.		
Total		0
Grand Total	500	232

(E)(1) Intervening in the lowest-achieving schools and LEAs	10	5
<p>(E)(1) Reviewer Comments: State Department of Education can intervene directly in both schools and LEAs based on specified criteria and processes. However, the schools in which the state can intervene are not the persistently lowest-achieving schools defined in the notice.</p>		
(E)(2) Turning around the lowest-achieving schools	40	21
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	16
<p>(E)(2) Reviewer Comments: Arizona already identifies each school by AYP and AZ LEARNS, and is in the process of revising the AZ LEARNS formula to include the definition of "persistently lowest-achieving" school. Thus, it has a high-quality plan to identify persistently lowest-achieving schools. The State's plan for what kind of support and guidance it will give to LEAs in turning around the lowest-achieving schools (as well as other underperforming schools) is comprehensive and provides goals and activities and designates responsible parties. However, it does not include a time-line for implementation of the plan beyond turning around four schools per year. The commitment to use of the four turn-around models is confusing. In one place it appears all of the models are available to the LEAs with persistently lowest achieving schools and in another it appears that the state will be using the transformation model. However, the description of the transformation model the state appears to be using does not fully align with the definition provided in the notice, in that it does not include replacement of the principal. With the exception of the Distinguished Educator Corps there is no plan for finding or preparing leaders who are capable of turning around or re-starting what was a persistently lowest-achieving school. It is also not clear how the state will bring those LEAs with less proficiency up to speed by holding them accountable for providing the training and professional development necessary to build the capacity. The state has experience in intervening in failing schools, but the lessons learned do not seem to be well analyzed.</p>		
Total	50	26

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	8
<p>(F)(1) Reviewer Comments: It is noteworthy that despite an extensive reduction in total revenues available to the state, the percentage of funds supporting education increased from 53.5% to 59.5%. The district funding formula ensures equitable access to budget capacity and revenues and is based, in part, on student characteristics and on the taxable property valuation per pupil. The adjustments do not appear to correlate with the RTTT definitions of high-need LEAs. In addition, there appears to be no evidence of policies that lead to equitable funding within LEAs, between high-poverty schools and other schools.</p>		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	28
<p>(F)(2) Reviewer Comments: There is no cap on the number of charter schools and, although there is no specific provision of law cited, the application asserts that there are no restrictions on the types of charter schools whatsoever. Arizona's charter laws provide clear guidance regarding how charter school authorizers approve, monitor, hold accountable, reauthorize and close charter schools. They do not encourage charter schools to serve student populations similar to local district student populations (however, given that</p>		

many of the charters are in rural areas or on reservations, this probably occurs). The application provides information on the number of charter school applications made, approved, denied and closed over the past five years. However, the application does not specify the reason that charter schools have been closed. The application provides detailed information about the state's approach to charter school funding and how it compares with funding of traditional schools. Charter schools in Arizona receive equitable funding; as compared with district schools, charter schools end up with more per student and more flexibility with respect to how the funds can be used. State law does not prohibit charter schools from applying for and receiving federal dollars. They receive a proportionate share of federal funding flowing to the state. The application does not provide evidence of how the state supports charter schools with regard to providing funding for facilities, assistance with acquisition, the ability to share in bonds and mill levies, or other supports. The application does describe certain recent legislation that has equalized the zoning requirements for charter schools and traditional public schools. In addition, a recent change has reduced the property tax burden for non-profit charter schools. However, there is no evidence or description about what burdens are placed on charters run by for-profit organizations. There is also no information provided about other facilities support that may be provided by the state. The application says that LEAs are free to operate innovative, autonomous public schools but there is no evidence presented that any of the examples provided are innovative, autonomous schools, as defined in the notice of application.

(F)(3) Demonstrating other significant reform conditions	5	1
(F)(3) Reviewer Comments: The TAPBI (now Arizona Online Instruction) program is innovative, reform-minded and responsive to public demand and Arizona's rural students; however, there is no evidence that it has increased student achievement, graduation rates or resulted in other important outcomes.		
Total	55	37

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	15	0
Competitive Reviewer Comments: There does not appear to be a sustained emphasis throughout the application on STEM. There is no high quality overall plan; rather, it appears that there are scattered programs in STEM-related areas. There is no evidence of a course of study or of a link between the STEM initiatives and the rest of the application initiatives. While it is noteworthy that there is a significant connection with STEM-related business, industry and resources that Arizona plans to take advantage of in its effort to increase the capabilities of teachers and the opportunities for students, given the extent of the resources there does not seem to be a well thought out plan of how to use them. The use of TFA to bring in teachers with math and science content may be effective, but it is a rather short-term solution given the average tenure of TFA teachers.		
Total	15	0

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		No
Absolute Reviewer Comments: The state's application, while ambitious, is neither comprehensive nor coherent in addressing all of the four education reform areas and the State Success Factors Criteria. The application presents separate		

(ii) Turning around the persistently lowest-achieving schools	35	9
(E)(2) Reviewer Comments: E2i – The application identifies sixteen persistently lowest-achieving schools and describes that the State definition will be changed to align to that of the notice. E2ii – The plan has only identified transformation as a possible school intervention model for turning around its persistently lowest-achieving schools, and does not describe that all of the transformation elements in the notice will be implemented (such as replacing the principal and/or at least 50% of the teachers). The state assumes that the other school intervention models will not be needed, which is a significant weakness of this portion of the application. The transformation model is also the only one that has been used by Arizona in the past as described in the application.		
Total	50	19

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	5
(F)(1) Reviewer Comments: F1i – The percentage of the total revenues available to the state in 2009 was greater than that of 2008. F1ii – As described in the application the State policies for equitable distribution of funds does not appear to consider high-need and high-poverty school criteria.		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	28
(F)(2) Reviewer Comments: F2i – The State has charter school laws that do not prohibit or effectively inhibit charter school development or charter school enrollment. F2ii – The application articulates the State laws regarding how charter school authorizers approve, monitor, hold accountable and reauthorize and close charter schools. Generally, student achievement is listed as one factor for renewal or closure. There is no specific mention of high-need students. As indicated in the proposal, Arizona has closed charter schools in the past. F2iii – The plan describes that charter schools in Arizona receive equitable funding at the same level as traditional school districts. F2iv –The plan describes that charter schools and school districts in Arizona receive equitable finding and that those funds could be used for facilities but does not assure that facility funding specifically is provided to charter schools. The state does not impose any facility-related requirements for charter schools that are stricter than those applied to traditional public schools. F2 v – The plan indicates that the State allows LEAs to operate innovative autonomous schools such as extended year schools, virtual schools, magnet schools and technology-based schools.		
(F)(3) Demonstrating other significant reform conditions	5	1
(F)(3) Reviewer Comments: The application describes a distance learning program which only minimally meets the criteria for an innovative program and no connection between that program and increased student achievement is described.		
Total	55	34

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
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(E)(2) Turning around the lowest-achieving schools	40	20
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	15
<p>(E)(2) Reviewer Comments: The application identifies the state's intervention schools for the last several years, a growing number of schools; these schools include many, but not all, of the schools identified under the Race to the Top (RTTT) formula (the state is currently revising its "AZ LEARNS" formula to align with the RTTT formula). The plan identifies an approach and set of interventions, though the means by which the Clearinghouse development would address underperforming and failing schools is not evident. Attention to reading, ECAPs, use of service leaves, specialists, after-school programs, APiP, e-learning, AZRTI and internet access are indicated as tools useful to local LEA's in developing approaches. The plan does not indicate means or models by which these components would be integrated and/or provide a clear view of how ADE would approach intervention, though the section on Native American Dropout Prevention suggests one such more comprehensive strategy. The relation of the approach used in the 50 Native American Communities to the lessons learned is unclear. Data provided in Appendix N suggests a significant bump in AIMS Reading and Math for earlier turnaround efforts, though the impact of AIMS test changes is unclear. Later turnaround efforts appear to have had considerably less impact on passing rates. The selection process or identity of schools for these tables is unclear.</p>		
Total	50	25

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	8
<p>(F)(1) Reviewer Comments: The plan provides evidence that the percentage of state funding going to educational support increased, within a context of sharply declining overall state revenue. Various aspects of the state funding formula provide the means to balance differences in need, taxable property value and other factors, though no quantitative data is provided to verify impact of said formulae.</p>		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	34
<p>(F)(2) Reviewer Comments: The state presents charter laws allowing no limit to the total number of charter schools, with over 540 in the state, and 100,000 students attending these schools. The application provides a detailed plan for authorization, monitoring, accountability, reauthorization and closure. Little evidence is provided for denial of charters during the last five years, however, and the number of charters closed was nearly twice the number as those approved in the same period, with no explanation provided. Charter schools receive funding according to the same equalized funding formula of all schools, and per the application, actually received more per student than traditional district schools in FY2009, reflecting weighting. Charters receive other state and federal assistance on commensurate terms, and facilities assistance has also been legislated. LEA's are not restricted from forming other types of innovative autonomous schools.</p>		
(F)(3) Demonstrating other significant reform conditions	5	2
<p>(F)(3) Reviewer Comments: The state provides some limited evidence that it has created, through law, regulation, or policy, other conditions favorable to education reform or innovation that have increased student achievement or</p>		

interests, aspirations, (4) Distinguished, successful practitioners, (Primarily retired or on-loan teachers and administrators) who speak from experience, are the most successful in turning around schools.

Total	50	32
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F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	9
<p>(F)(1) Reviewer Comments: (F)(1) (i) High points were awarded to this section because Arizona increased its percentage of educational support from 53.5% to 59.5% although budget cuts reduced the actual dollars available to schools. State revenues were down 18% and large cuts were made in the state budget. Education was cut but those cuts were less than other areas of the budget. (F)(1)(ii) High points were awarded to this section because Arizona has an equalization funding formula that provides state money to localities with limited taxable properties. It also provides additional funds to districts on the basis of students with special needs and English language learners. Supplemental funds are provided to districts with less than 600 students and those that are very isolated.</p>		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	40
<p>(F)(2) Reviewer Comments: (F)(2) (i) Maximum points were awarded to this section because Arizona has a charter school law that does not prohibit or effectively inhibit increasing the number of high-performing charter schools. There are no caps or limits as to the number of charters that can operate in the state or in a particular region or district. Charter schools can be created by three different authorizing agencies. They are school districts, the SBE and the Arizona State Board for Charter Schools. In the 2009-2010 school year, there are over 100,000 students attending charter schools. Currently 43% of charter schools are in rural counties. (F)(2)(ii) Maximum points were awarded to this section because the State has statutes requiring monitoring and general oversight. Some of the requirements include five year interval comprehensive reviews. Additionally charter schools have annual independent audits and annual performance reviews. (F)(2)(iii) Maximum points were awarded to this section because the State's charter schools receive larger amounts of funding compared to traditional public schools. In 2009, charter schools received an average of \$6,396 per student as compared with \$5,435 for public school students. (F)(2)(iv) Maximum points were awarded to this section because some of that differences actually appear to assist charter schools with facilities costs. Laws were changed to allow charter schools to pay minimal property taxes on facilities. (F)(2)(v) Maximum points were awarded to this section because the State enables LEAs to operate innovative, autonomous public schools if they wish to do so.</p>		
(F)(3) Demonstrating other significant reform conditions	5	2
<p>(F)(3) Reviewer Comments: (F)(3) Medium points were awarded to this section because Arizona described one program but did not provide reform areas in the four areas of concern in the notice. The Technology Assisted Project Based Instruction Program (TAPBIP) is a distance learning program established in 1998. This program is still in seven school districts and seven charter schools.</p>		
Total	55	51