A Concerned Analysis of Arizona's ESSA Draft Plan for Supporting All Students

The shift to more local control provides an opportunity for state and local stakeholders to escape the limitations of the Every Student Succeeds Act. This is especially true for those concerned with moving away from the existing fragmented and marginalized approaches that dominate efforts to deal with factors interfering with student success.

In this context, a fundamental question now is: ***How will states use the opportunity for improving the way schools address barriers to learning and teaching and re-engage disconnected students and families?***

This question, of course, is critical to efforts to enhance equity of opportunity for students to succeed at school and beyond.

We know that outreach for feedback on a consolidated state plan is directed at local stakeholders. However, the future of public education is a concern for all of us, and state plans are critical to that future. So, our intent here, as always, is to offer constructive analyses, perspectives, and recommendations as a concerned and interested party.

This is our first analysis of an SEA draft plan related to how a state proposes to address factors that interfere with learning and teaching. We hope it will be helpful as others move forward.

And we also hope that readers of this brief will send us drafts of other state plans. But, more importantly, we urge stakeholders to analyze and provide direct feedback to state and local planners.

A Concerned Analysis of Arizona's ESSA Draft Plan
for Supporting All Students

T he shift to more local control provides an opportunity for state and local stakeholders to escape the limitations of the federal Every Student Succeeds Act (ESSA). This is especially true for efforts to move away from existing fragmented and marginalized approaches for dealing with factors interfering with student success. With an emphasis on enhancing equity of opportunity for success at school and beyond, state and local planning can draw not only on narrow evidence-based practices, but on research that has generated frameworks and prototypes for developing a unified and comprehensive system for student and learning supports.

To encourage planning that moves in broader, bolder ways, it is essential to analyze SEA draft plans to see how they propose to address barriers to learning and teaching and re-engage disconnected students and families. Arizona's plan is our first effort to do so. We realize that drafts will undergo changes based on stakeholder feedback across a state. We also believe that states will be reviewing each other's plans, and we hope they also will consider the constructive analyses, perspectives, and recommendations we provide as a concerned and friendly party.

In particular, we hope they will take steps to avoid the potential pernicious impact some of the federal guidelines can have on state and local planning.

Why do we say pernicious?

As our analysis of the legislation indicates, the act clearly underscores that student and learning supports permeate efforts to enable every student to succeed. At the same time, the legislation muddies the nature and scope of such supports by scattering references to them throughout the various Titles, Parts, Subparts, and Sections. (See *ESSA, Equity of Opportunity, and Addressing Barriers to Learning* – http://smhp.psych.ucla.edu/pdfdocs/essaanal.pdf .)

It is evident that, by addressing barriers to learning in a piecemeal and mostly indirect way, ESSA and the federal guidelines convey a fractured approach and a lack of coherence with respect to providing essential student supports (https://www.federalregister.gov/documents/2016/05/31/2016-12451/elementary-and-secondary-education-act-of-1965-as-amended-by-the-every-student-succeeds).

The irony of this is that, rather than encouraging state and local leadership to improve schools in bold and innovative ways, state planners are likely to formulate plans mainly with the intent of meeting the requirements of the federal law in ways that justify what they have been doing.

What Does the Arizona Plan Say about Supporting All Students?

Arizona's ESSA plan for supporting all students reflects the commitment in its "AZ Kids Can't Wait! Plan 2015" for building a student support system. The section of Arizona's ESSA plan for *supporting all students* is included in Appendix 1. As can be seen, the plan mainly provides direct responses to the federal government's ESSA guidance.

By narrowly following ESSA's lead, the plan embraces the limitations of the act. As the following key examples indicate, the plan calls for Local Educational Agencies (LEAs) to:
- use a Multi-Tiered System of Support (MTSS) framework that incorporates Universal Design for Learning strategies for instruction, as appropriate
- support students as they transition between school years
- use response to instruction and intervention as well as in-class assessment
- provide instruction for identifying bullying and harassment behavior and strategies to reduce bullying and harassment at least annually to all enrolled students and school staff
- develop strategies that identify patterns of misbehavior and use positive behavior intervention strategies
- avoid interventions that are aversive or compromise the student's health and safety

- identify and address technology needs for all students, in particular to help enhance the ability of at-risk and disabled learners to access text and facilitate their communication, motor, social/emotional, adaptive, and academic skills (including assistive technology)
- identify English language learners in a uniform manner in accordance with Arizona Revised Statutes
- identify students with disabilities in a uniform manner in accordance with the Individuals with Disabilities Education Act (IDEA) and Arizona Revised Statute
- consider, the academic and non-academic needs of all other subgroups of students – low-income students, lowest-achieving students, children and youth in foster care, migratory children, homeless children and youths, neglected, delinquent, and at-risk students, immigrant children and youth, students in LEAs eligible for grants under the Rural and Low-Income School program, American Indian students
- follow the SEA's process and criteria to waive the 40 percent school-wide poverty threshold for Title I, part A
- follow the SEA's identification, recruitment, and four stage continuous improvement cycle for all migratory students
- provide all school personnel professional development on topics that improve student learning outcomes such as: Multi-Tiered Systems of Support, Universal Design for Learning, evidence-based instruction, school improvement, data driven instruction, disability awareness, behavior management, children with special health care needs, school safety, gifted learners or other professional development needs as identified by local Comprehensive Needs Assessments
- work with the SEA using a cross-divisional collaborative model to align efforts to support LEA local plans for use of title IV, part A and part B funds, and other Federal funds and use SEA Guidance for analyzing current successful programs and initiatives within the allowable funding framework and leverage Title IV-A funds to deepen, accelerate, enhance or integrate current successful programs

All this is reasonable given the way ESSA lists the work. However, the many limitations of the plan are apparent when viewed from the perspective of efforts to end the marginalization, fragmentation, redundancy, counterproductive competition, and inadequate outcomes that characterize student and learning supports at too many schools. We understand that the legislation and the state's plan reflect political realities. However, our research stresses that, when it comes to addressing barriers to learning and teaching and re-engaging disconnected students and families, the reality at schools calls for a unified, comprehensive, and equitable system of learning and student supports.

What are the Plan's Limitations?

Clearly, by following ESSA's guidance, the plan highlights a list of efforts to provide student and learning supports. However, by mainly responding reactively to each section, Arizona's plan parallels the failings of the legislation. That is,

- it continues to muddy the nature and scope of student and learning supports by scattering references to such supports throughout the various sections of the plan and thus addresses barriers to learning in a piecemeal and mostly indirect manner;

- it doesn't reference the type of direct standards and accountability that can guide the development of an effective system for addressing barriers to learning and teaching;

- it gives short shrift to student and learning supports staff throughout the plan (e.g., see the section on the support of excellent educators).

Consequently, as does ESSA, the Arizona plan conveys an inadequate approach to supporting all students and will continue the long-standing marginalized, fragmented, and incoherent way essential student and learning supports are provided.

With respect to the SEA's support for LEAs and schools, the plan indicates that it will use its "Comprehensive System of Support." In general, this "system" stresses a range of traditional approaches (e.g., conferences, workshops, webinars, online courses, phone conferences, consultation, technical assistance, monitoring), as well as organizing Integrated Support Teams across program areas, offering strategic partners (vetted external providers), and providing ongoing desktop support as needed. These strategies, however, do not constitute the type of institutionalized operational infrastructure that can continuously facilitate significant and sustainable LEA and school level systemic changes and ensure ongoing local capacity building -- especially at low performing schools.

Our concern is that the limited focus of this type of state planning provides no direction for altering the marginalization, fragmentation, redundancy, counterproductive competition, and inadequate outcomes that undermine efforts to address barriers to learning and teaching and re-engage disconnected students and families. Statements about supporting LEAs and coordinating programs are not the same as plans to unify and blend resources. Supporting all students involves a bolder and innovative approach.

What's Needed?

Addressing the *Multifaceted* Problems of the *Many* Students in Need

Every school is confronted with a range of students who manifest learning, behavior, and emotional problems. In some schools, especially those serving low-wealth families, as many as 40% of students are not doing well.

And the problems are multifaceted and have a history and context. That is, students who are not doing well at school usually manifest overlapping learning, behavior, and emotional problems, and the causes usually are complex. For example, long before a student contemplates dropping out, s/he will have had many debilitating experiences at home, in the neighborhood, at school. The same is true for problems such as truancy, bullying, addictions, school shootings, and other psychosocial problems.

Schools must address *all* problems interfering with students' school performance, as well as doing as much as feasible to prevent such problems. This means playing a fuller and more effective role in promoting health (mental and physical), preventing psychological and psychosocial problems, and responding appropriately when students manifest learning, behavior, emotional, and physical problems.

Fundamental System Changes to Unify and Develop a Comprehensive and Equitable System of Student and Learning Supports

From a policy and practice perspective, the opportunity presented by the Every Student Succeeds Act (ESSA) is to use state and district planning to rework school improvement policy and practice. A critical aim in doing so is to transform student and learning supports over several years in ways that enhance equity of opportunity and well-being for *ALL* students (and staff).
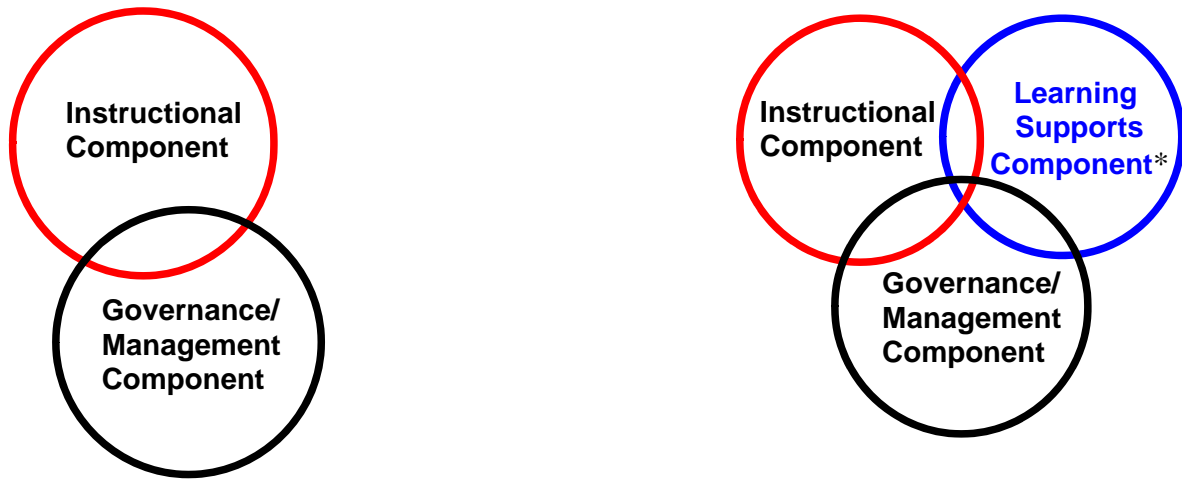
The transformation begins with *unifying* existing efforts to address barriers to learning and teaching and re-engage disconnected students and families. Such a unification requires the expansion of school improvement policy from a two- to a three-component approach (see the illustration on the following page). It is the third component that provides the foundation for developing student and learning supports into *a comprehensive and equitable system* (see Appendix 2).

Expanding school improvement policy and practice from a two to a three component model.

Two Component Framework → **Three Component Framework**

Instructional Component

Governance/ Management Component

Instructional Component

Learning Supports Component*

Governance/ Management Component

*Among those who have already moved to a three-component framework, the component to address barriers to learning and teaching generally is called a learning supports component. Also note that because policy for improving schools across the country is "standards-based" and accountability driven, expanding the prevailing accountability framework and establishing standards for learning supports are key considerations in effective implementation of a three component policy.

As outlined in Appendix 2, the third component reframes the Multitiered System of Supports (MTSS) into a multidimensional approach that (a) interconnects the overlapping levels of intervention, (b) weaves together school and community interventions and resources, and (c) delineates the arenas of supports.

More specifically, the component encompasses an intervention continuum that effectively weaves together school and relevant community resources to produce an interconnected set of *subsystems* for promoting healthy social emotional development, preventing problems, responding quickly when problems arise, and contributing effectively to helping those with severe and chronic problems.

At each subsystem level of the continuum, student and learning supports are organized cohesively into a set of well-designed and delimited intervention arenas; our research has categorized the usual listing of programs and services into six arenas of concerns that schools need to address each day (see Appendix 2).

All this has implications for enhancing in-classroom student and learning supports by retooling what ESSA labels as specialized instructional support personnel (e.g., student and learning support personnel – psychologists, counselors, social workers, nurses, Title I staff, dropout/graduation support staff, special educators,, etc.). The jobs of these personnel need redefining to include working collaboratively with teachers *in classrooms* for part of each day. Improving student and learning supports in classrooms requires such collaboration, and such collaboration is essential to ending the myths and expectations that teachers can do it all and can do it alone.

**Planning Beyond Tinkering:
Go for the Bold to Better Address Barriers to Learning and Teaching**

We were struck by the statement in Arizona's plan of the need for LEAs to pursue bold and innovative approaches. The emphasis is on encouraging the selection of evidenced-based interventions. This is good, but a note of caution is in order here.

No matter the science-base and how appealing and well-intentioned a given practice may be, the question is not: Will it do *some* good? – the big picture question is: *How much will it generally improve conditions for learning?* And in this respect, a fundamental concern involves what is and isn't being done about the many conditions interfering with students learning and teachers teaching the whole child and all students effectively.

Schools cannot afford to continue adding programs and initiatives in an ad hoc and piecemeal manner. Schools cannot continue to focus primarily just on improving instruction and management. Such efforts are insufficient for addressing barriers to learning and teaching, increasing equity of opportunity for all students, promoting whole child well-being, and generating a positive school climate. So, as decision makers and planners move forward to improve schools, they must weigh the costs and benefits of every proposal in light of the need to transform student and learning supports. And the transformation must benefit all, not just a few more students.

The move to bring education planning back to states and districts is an opportunity and a challenge to end the tinkering. Taking advantage of the new opportunities and meeting the challenge calls for starting to plan new directions now.

Research and development has produced prototypes for a unified, comprehensive, and equitable system of learning and student supports. These prototypes already are being used by trailblazers across the country. The prototypes are based on frameworks developed to guide (1) an expansion of school improvement *policy* to ensure development of a unified component for directly addressing barriers to learning, (2) a reformulation of student and learning support *interventions* in classrooms and schoolwide, (3) a reworking of the *operational infrastructure* for daily implementation and ongoing development, and (4) the facilitation of *systemic change* for effective implementation, replication to scale, and sustainability. Detailed discussions of each of these interrelated matters are available in various Center reports.

For example, see

> *ESSA, Equity of Opportunity, and Addressing Barriers to Learning –*
> http://smhp.psych.ucla.edu/pdfdocs/essaanal.pdf

For places such work is underway, see

> *National Initiative for Transforming Student and Learning Supports –*
> http://smhp.psych.ucla.edu/newinitiative.html

Concluding Comments

Again, it should be noted that we understand the Arizona plan is a first draft. Our intent is to highlight for stakeholders and planners ways they can improve the plan with respect to their goal of building a strong student support system. Of particular concern is how schools and communities focus on reducing factors that produce inequities.

Public education is not well-served by maintaining the unsatisfactory status quo related to addressing barriers to learning and teaching. Ending the disorganization and effectively weaving together whatever a school has with whatever a community is doing to confront barriers to equity of opportunity calls for system transformation. Given sparse resources, if schools and communities do not work collaboratively and strategically to transform student and learning supports, we fear a continuing slide into a three-tiered set of K-12 institutions – one tier for the poor, one for the wealthy, and another for everyone else.

As leaders for fundamental changes stress, school transformation is not about specific programs and initiatives; it's about significant changes at social, political, and cultural levels. Given how many powerful economic and political forces are in pursuit of conflicting agenda for public schools, addressing these matters in policy and practice is an enormous challenge. Working together to transform public education is an awesome responsibility. To do less, however, is to maintain and worsen the extremely unsatisfactory state of affairs and exacerbate the growing threat to public education.

State and local planning related to the transition from No Child Left Behind to ESSA provides a unique opportunity for improving schools. The question before us is: ***Will ESSA plans significantly enhance equity of opportunity for students to succeed at school and beyond?***

> *Equity of opportunity is fundamental to enabling civil rights;*
> *transforming student and learning supports is fundamental to*
> *enabling equity of opportunity and promoting whole child development.*

Appendix 1

From: Arizona's ESSA SEA Consolidated State Plan
https://cms.azed.gov/home/GetDocumentFile?id=57d09772aadebe06703c0494

§ 299.19 Supporting all students

(a) Well-rounded and supportive education for students

(1) In its consolidated State plan, each SEA must describe its strategies, its rationale for the selected strategies, timelines, and how it will use funds under the programs included in its consolidated State plan and support LEA use of funds to ensure that all children have a significant opportunity to meet challenging State academic standards and career and technical standards, as applicable, and attain, at a minimum, a regular high school diploma consistent with §200.34, for, at a minimum, the following:

(i) The continuum of a student's education from preschool through grade 12, including transitions from early childhood education to elementary school, elementary school to middle school, middle school to high school, and high school to post-secondary education and careers, in order to support appropriate promotion practices and decrease the risk of students dropping out;

Local Educational Agencies (LEAs) will use a Multi-Tiered System of Support (MTSS) framework that incorporates Universal Design for Learning (UDL) strategies for instruction, as appropriate. Instruction will be provided using within-class groups whenever feasible. Students will move between within-class groups based on the student's response to instruction and intervention as well as in-class assessment results. Intervention strategies will be aligned directly to student need and time in intervention will vary to meet those needs. Processes to support students as they transition between school years will be determined by LEAs. The Arizona Department of Education will provide professional learning, technical assistance, service and support to LEAs as needed or appropriate to support the implementation of these strategies.

Arizona recognizes the need to support schools and LEAs in their efforts to provide a well-rounded education for their students, including academic and other programs and options such as Career and Technical Education (CTE) program options, health and wellness programs, advanced and accelerated learning options -such as advanced placement programs and gifted education programs -, arts and music programs, athletics and physical education programs and educational technology options and supports.[*]

(ii) Equitable access to a well-rounded education and rigorous coursework in subjects such as English, reading/language arts, writing, science, technology, engineering, Mathematics, foreign languages, civics and government, economics, history, geography, computer science, music, career and technical education, health, physical education, and any other subjects in which female students, minority students, English language learners, children with disabilities, and low-income students are underrepresented;

LEA curriculum and instruction, as required by Arizona Revised Statutes §15-701, will be aligned to challenging academic standards. Through alignment to Arizona standards, all Arizona students will be provided equal access to a challenging, well-rounded instructional experience. Struggling learners will be addressed through intervention strategies while advanced learners receive opportunity for acceleration and enrichment.[*]

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(iii)   School conditions for student learning, including activities to reduce—
(A) Incidents of bullying and harassment;

LEAs will provide instruction in the identification of bullying and harassment behavior and strategies to reduce bullying and harassment at least annually to all enrolled students and school staff. LEAs will use positive behavior intervention strategies reported in accordance with Arizona Revised Statutes §15-341(A)(36) to reduce bullying and harassment. Each LEA will document and report to the Arizona Department of Education the number of bullying and harassment incidents each school year to ensure these incidents are reduced.[*]

(B) The overuse of discipline practices that remove students from the classroom, such as out-of-school suspensions and expulsions; and

LEAs will develop strategies that identify patterns of misbehavior resulting in students removed from the classroom for reasons of discipline. The LEA will use positive behavior supports to reduce out of class removals. Safeguards and procedures related to disciplinary practices are outlined in Arizona Revised Statutes §§15-841 and 15-842.

(C) The use of aversive behavioral interventions that compromise student health and safety;

LEAs shall not use behavioral interventions that are aversive or compromise the student's health and safety.

(iv)   The effective use of technology to improve the academic achievement and digital literacy of all students;

The Arizona Department of Education supports schools and LEAs to effectively leverage technology to support student learning and digital literacy. The State Board of Education adopted Educational Technology standards to help guide teachers to support these efforts: http://www.azed.gov/standards-practices/academic-standards/2009-technology-standard/.

The Arizona Department of Education has supported schools and LEAs to complete technology readiness assessment, to help local systems to gauge their ability and capacity to support online learning and assessment from a systems, connectivity and capacity perspective. Additionally, the Arizona Department of Education has procured a statewide Learning Management System (LMS) solution – Blackboard Learn™ and Collaborate™ - that is available for LEAs to opt-into to support student K-12 online and hybrid learning and educator professional learning. http://www.azed.gov/aelas/lms/ *

The Arizona Department of Education also supports LEAs to identify and address technology needs for all students, in particular to help enhance the ability of at-risk and disabled learners to access text and facilitate their communication, motor, social/emotional, adaptive, and

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academic skills. Assistive technology supports will be provided to qualified students.

| (v) Parent, family, and community engagement; |

Arizona Revised Statutes §15-351 requires LEAs to form school councils to ensure that shared decision making occurs. At a minimum, these councils must include parents, teachers, students, community members and a school administrator. Additional constituents can be added by the LEA. School councils encourage parent and community engagement in their child's education by forming groups of local parent constituents at each school operated by the LEA to advise LEA leadership of each school's unique strengths and needs that affect student performance.

| (vi) The accurate identification of English language learners and children with disabilities; and |

English Language Learners
English language learners shall be identified in a uniform manner in accordance with Arizona Revised Statutes Title 15, Chapter 7, Article 3.1. English Language Education for Children in Public Schools, in particular §15-756.

Arizona English Language Learner Guide for Local Educational Agencies (LEA):
https://cms.azed.gov/home/GetDocumentFile?id=5541130daadebe0b186bcb7b

Students with Disabilities
Students with disabilities shall be identified in a uniform manner in accordance with the Individuals with Disabilities Education Act (IDEA) and Arizona Revised Statute §§ 15-766, and State Board of Education Rules R7-2-401 Special Education Standards for Public Agencies Providing Educational Services.

ADE Resources and Guidance to Support Arizona Child Find:
http://www.azed.gov/special-education/az-find/

| (vii) Other State-identified strategies. |

LEAs will be encouraged to provide all school personnel professional development on topics that improve student learning outcomes such as: Multi-Tiered Systems of Support, Universal Design for Learning, evidence-based instruction, school improvement, data driven instruction, disability awareness, behavior management, children with special health care needs, school safety, gifted learners or other professional development needs as identified by local Comprehensive Needs Assessments.[*]

Schools are also required to develop an Education and Career Action Plan (ECAP) for all students in grade 9-12, per SBE rule R7-2-302.05. [*]
http://www.azed.gov/ecap/

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(2) In describing the strategies, rationale, timelines, and funding sources in paragraph (a)(1) of this section, each SEA must consider—
(i)   The academic and non-academic needs of subgroups of students including—
(A) Low-income students.
(B) Lowest-achieving students.
(C) English language learners.
(D) Children with disabilities.
(E) Children and youth in foster care.
(F) Migratory children, including preschool migratory children and migratory children who have dropped out of school.
(G) Homeless children and youths.
(H) Neglected, delinquent, and at-risk students identified under title I, part D of the Act.
(I)   Immigrant children and youth.
(J) Students in LEAs eligible for grants under the Rural and Low-Income School program under section 5221 of the Act.
(K) American Indian and Alaska Native students.

The Arizona Department of Education has, and will consider, the academic and non-academic needs of all subgroups of students listed above in the development and implementation of the strategies described in paragraph (a)(1) of this section.

(ii)   Data and information on resource equity consistent with paragraph (a)(3) of this section.
(3) In its consolidated State plan, the SEA must use information and data on resource equity collected and reported under section 1111(h) of the Act and §§ 200.35 and 200.37 including a review of LEA-level budgeting and resource allocation related to—
(A) Per-pupil expenditures of Federal, State, and local funds;
(B) Educator qualifications as described in § 200.37;
(C) Access to advanced coursework; and
(D) The availability of preschool.

The Arizona Department of Education will use the information and data on resource equity and a review of LEA-level budgeting and resource allocation related to the above categories.

(4) In its consolidated State plan, each SEA must describe how it will use title IV, part A and part B funds, and other Federal funds—
(i)   To support the State-level strategies described in paragraph (a)(1) of this section and other State-level strategies, as applicable; and

Technical assistance, service and support will be provided by the Arizona Department of Education leveraging set-aside funds to support LEA local plans in alignment with allowed funding areas

Support from the Arizona Department of Education will be provided using a cross-divisional collaborative model to align efforts to support LEA local plans, through the Arizona Department of Education Comprehensive System of Support described under the ADE's response to **Section**

299.14 (c) 1-3 – (See Pages 5-10).

(ii) To ensure that, to the extent permitted under applicable law and regulations, the processes, procedures, and priorities used to award subgrants under an included program are consistent with the requirements of this section.

The Arizona Department of Education will review and approve LEA applications for subgrants under included programs and provide technical assistance in the implementation of LEA plans in accordance with the performance management and technical assistance framework and model described in Section 299.14 (c) 1-3 (pages 5-10).

Further, for resources received by LEAs for Title IV-A:
- The Arizona Department of Education will support LEAs to leverage their local Comprehensive Needs Assessment information to inform their local plan development:
  - Guidance will be provided to support local LEA plan development by:
    - Encouraging the analysis of current successful programs and initiatives within the allowable funding framework; and,
    - Encouraging leveraging Title IV-A funds to deepen, accelerate, enhance or integrate current successful programs;
- Local programmatic and fiscal plans for Title IV-A will be reviewed and approved in accordance with the process described in Section 299.14 (c) 1-3 (pages 5-10);
- The Title IV-A allocation process is to be determined based on final funding level and USED guidance; and,
- Awards will be monitored using the SEA performance management process described in Section 299.14 (c) 1-3 (pages 5-10).

(b) Performance management and technical assistance
In addition to the requirements in § 299.14(c), each SEA must describe how it will use the information and data described in paragraph (a)(3) of this section to inform review and approval of LEA applications and technical assistance in the implementation of LEA plans.

The Arizona Department of Education will use the information and data described in in paragraph (a)(3) of this section to inform review and approval of LEA applications and technical assistance in the implementation of LEA plans in accordance with the performance management and technical assistance framework and model described in Section 299.14 (c) 1-3 **(see pages 5-10)**.

(c) Program-specific requirements
(1) **Title I, part A.**   Each SEA must describe the process and criteria it will use to waive the 40 percent schoolwide poverty threshold under section 1114(a)(1)(B) of the Act submitted by an LEA on behalf of a school, including how the SEA will ensure that the schoolwide program will best serve the needs of the lowest-achieving students in the school.

The following describes the process and criteria used by the Arizona Department of Education to waive the 40 percent schoolwide poverty threshold for Title I, part A:

1. Each LEA designates the program type and poverty measure within its Consolidated Application for each school it expects to serve with Title I funds. If an LEA requests to serve a school with less than 40% poverty with a schoolwide model, the LEA will be required to submit a written request within the application to waive the 40% threshold. The LEA must include a description of how the schoolwide program will serve the needs of all students in the school, including its lowest-achieving students.
2. The criteria for approval include:
   a. The LEA described how its decision for schoolwide program was made, including data from the school's Comprehensive Needs Assessment
   b. The LEA described how its choice of a schoolwide program will meet the needs of all students, including the lowest-achieving students

(2) **Title I, part C.** In its consolidated State plan, each SEA must describe—
(i)   How the SEA and its local operating agencies (which may include LEAs) will—
(A) Establish and implement a system for the proper identification and recruitment of eligible migratory children on a statewide basis, including the identification and recruitment of preschool migratory children and migratory children who have dropped out of school, and how the SEA will verify and document the number of eligible migratory children aged 3 through 21 residing in the State on an annual basis;

The Arizona Department of Education Migrant Education Program Office (MEP) is currently revising its identification and recruitment plan for all migratory students, birth through 21 years of age, living in Arizona. The Arizona Department of Education Migrant Education Program Office is committed to maintaining a recruitment strategy that is relevant, collaborative and innovative while remaining in full compliance with State and Federal regulations. Documentation of student eligibility is a completed Certificate of Eligibility which is reviewed, verified and validated at the LEA and State level.[*]

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(B) Assess the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, and other needs that must be met in order for migratory children to participate effectively in school;

The Arizona Department of Education Migrant Education Program Office completes the following four stage process in the continuous improvement cycle to ensure that all migratory students' needs in Arizona are met. This process includes: 1) a comprehensive needs assessment that captures the current needs of the Migratory students; 2) a service delivery plan is drawn up based on the needs identified in the first stage; 3) implementation of the program services needed to assist our students; and 4) a program evaluation to determine if the objectives of the services were met. The last stage informs the first stage for the next cycle.

(C) Ensure that the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, and other needs that must be met in order for migratory children to participate effectively in school, are identified and addressed through the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs; and

The Arizona Department of Education Migrant Education Program Office provides technical assistance and monitors the Migrant Education Program LEAs to ensure that the full range of services is available for migratory children.

(D) Use funds received under title I, part C to promote interstate and intrastate coordination of services for migratory children, including how the State will provide for educational continuity through the timely transfer of pertinent school records, including information on health, when children move from one school to another, whether or not such move occurs during the regular school year;

The LEA Migrant Education Program ensures the timely record transfer of pertinent school records, including health information of migratory children. The Arizona Department of Education Migrant Education Program Office assists LEAs if a request for records is made to the Arizona Department of Education Migrant Education Program Office. The Arizona Department of Education Migrant Education Program works with school staff to locate historical and current records from migratory students transferring to their LEA.[*]

(ii) The unique educational needs of the State's migratory children, including preschool migratory children and migratory children who have dropped out of school, and other needs that must be met in order for migratory children to participate effectively in school, based on the State's most recent comprehensive needs assessment;

The Arizona Department of Education Migrant Education Program Office assesses the educational needs of the migratory children during the Comprehensive Needs Assessment. The

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identified needs were then addressed in the Service Delivery Plan. The Arizona Department of Education Migrant Education Program Office offers technical assistance to Migrant Education Program LEAs in meeting the Measurable Program Outcomes (MPOs). Measurable Program Outcomes data is submitted annually to the Arizona Department of Education Migrant Education Program Office.

(iii)	The current measurable program objectives and outcomes for title I, part C, and the strategies the SEA will pursue on a statewide basis to achieve such objectives and outcomes;

The Arizona Department of Education Migrant Education Program Office provides technical assistance and monitors the Migrant Education Program LEAs so as to ensure that the strategies and Measurable Program Outcomes in the Service Delivery Plan are being achieved. The Arizona Department of Education Migrant Education Program Office works collaboratively with the Migrant Education Program LEAs statewide to reach these outcomes.

(iv)	How it will ensure there is consultation with parents of migratory children, including parent advisory councils, at both the State and local level, in the planning and operation of title I, part C programs that span not less than one school year in duration consistent with section 1304(c)(3) of the Act;

The State Migrant Parent Advisory Council (SMPAC) meets four times a year to consult with the Arizona Department of Education Migrant Education Program Office in the planning, operation and evaluation of the Arizona Migrant Education Program Office for both the state program and local projects.

Each Migrant Education Program LEA includes measurable parent involvement objectives. The activities designed to meet these objectives will encourage parents to become more actively involved in the educational process of their children.

(v)	Its processes and procedures for ensuring that migratory children who meet the statutory definition of "priority for services" are given priority for title I, part C services, including—
	(A) The specific measures and sources of data used to determine whether a migratory child meets each priority for services criteria;

The Arizona Department of Education Migrant Education Program Office sets a standard for LEAs to use as a set of procedures that includes reviewing the grade history and formative and summative assessment data for each newly identified migratory student. The local level enrollment information is recorded promptly and correctly and site staff has access to assessment and enrollment data.[*]

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(B) The delegation of responsibilities for documenting priority for services determinations and the provision of services to migratory children determined to be priority for services; and

The Arizona Department of Education Migrant Education Program Office provides training and technical assistance to Migrant Education Program LEAs on the prompt identifying and documenting of Priority for Service students.

(C) The timeline for making priority for services determinations, and communicating such information to title I, part C service providers.

The Migrant Education Program LEA identifies the Priority for Services students. Once a student of school age is identified as migrant, their "Priority for Service" is determined. Priority is given to migratory students who are failing, to meet stated academic achievement standards (State Assessments) and whose education has been interrupted during the regular school year.

(3) Title III, part A.
Each SEA must describe its standardized entrance and exit procedures for English language learners, consistent with section 3113(b)(2) of the Act. These procedures must include valid and reliable, objective criteria that are applied consistently across the State. At a minimum, the standardized exit criteria must—

(i)	Include a score of proficient on the State's annual English language proficiency assessment;
(ii)	Be the same criteria used for exiting students from the English learner subgroup for title I reporting and accountability purposes;
(iii)	Not include performance on an academic content assessment; and
(iv)	Be consistent with Federal civil rights obligations.

Upon first enrollment in an Arizona public school, a parent/guardian will answer three questions regarding home language. If any of the three questions is answered with a language other than English, an AZELLA Placement test is administered to the student by a trained and qualified test administrator. If the student scores below "Proficient," he/she is offered English language services. All students who score below "Proficient" on the AZELLA, even those students who have been opted out of English language services by their parents, participate in AZELLA testing every Spring until they score "Proficient." Scoring "Proficient" on the AZELLA is a requirement for exiting English language services. To score "Proficient" on AZELLA requires the student to score "Proficient" on the Reading domain, the Writing domain, and overall. The overall score is a composite score comprised of the Reading, Writing, Listening, and Speaking domain scores.

Arizona policies and procedures ensure consistency with the Federal civil rights guidelines.

(4) Title V, part B, subpart 2.
In its consolidated State plan, each SEA must provide its specific measurable program objectives and outcomes related to activities under the Rural and Low-Income School program, if applicable.

The specific measurable program objectives and outcomes for each participating LEA related to the Rural and Low-Income School program will be driven by each LEA's Comprehensive Needs Assessments and aligned Comprehensive Strategic Plans, as well as requirements (as applicable) of Arizona's school and LEA accountability system.

(5) McKinney-Vento Education for Homeless Children and Youths program.
In its consolidated State plan, each SEA must describe—

(i) The procedures it will use to identify homeless children and youths in the State and assess their needs;

Identification of children and youth experiencing homelessness will primarily be the responsibility of local educational agencies, with support materials provided by the National Technical Assistance Provider. Upon identification and enrollment, local educational agencies will assess the needs of children and youth experiencing homelessness through a locally developed informal needs assessment tool.[*]

(ii) Programs for school personnel (including liaisons designated under section 722(g)(1)(J)(ii) of the McKinney-Vento Act, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youths, including such children and youths who are runaway and homeless youths;

The Arizona Department of Education Office of Homeless Education will provide ongoing training to all school personnel on the requirements of the McKinney-Vento Homeless Education Program, to heighten the awareness of children and youth experiencing homelessness. These training opportunities include in-person meetings, webinars and conferences and are conducted regionally throughout the State of Arizona.*

(iii) Its procedures to ensure that—

(A) Disputes regarding the educational placement of homeless children and youths are promptly resolved;

The Arizona Department of Education Office of Homeless Education has established a dispute resolution procedure with the purpose of providing an opportunity for the parent/guardian/unaccompanied youth to dispute a local educational agency decision on eligibility, school selection, and enrollment or transportation feasibility. The procedure ensures a prompt resolution with a full timeline of review and delivery of decision within 14 working days.

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(B) Youths described in section 725(2) of the McKinney-Vento Act and youths separated from the public school are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this paragraph from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school polices;

The Arizona Department of Education enables schools to maintain current course names and local course codes and also links those courses and codes to a common statewide course framework through the Arizona Education Data Standards (AzEDS) school and LEA data reporting process. Furthermore, the Office of Homeless Education works collaboratively with local educational agencies to develop locally driven policies and procedures to support children and youth experiencing homelessness and ensure they face no barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school.

(C) Homeless children and youths have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State;

Currently, Arizona does not have a public preschool program; however, children and youth experiencing homelessness have the same access to the provision of early childhood special education services as defined in Arizona Education Code. The Office of Homeless Education will continue to build upon existing collaboration with the Early Childhood Education Unit, providing new avenues for training, technical assistance and collaboration at the local level.

(D) Homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities; and

The Arizona Department of Education Office of Homeless Education provides ongoing training and technical assistance to local educational agencies, ensuring all barriers, including transportation, to academic and extracurricular activities are removed and addressed for children and youth experiencing homelessness.[*]

(E) Homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, and local nutrition programs; and

The Arizona Department of Education Office of Homeless Education successfully collaborates with the National School Lunch Program to ensure all children and youth experiencing homelessness receive free breakfast and lunch while enrolled in and attending school. Additionally, the Office of Homeless Education provides ongoing training and technical assistance to local educational agencies to include information on the categorical eligibility for children and youth experiencing homelessness in the National School Lunch Program.*

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(iv)	Its strategies to address problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays and retention, consistent with section 722(g)(1)(H) and (I) of the McKinney-Vento Act.

The Arizona Department of Education Office of Homeless Education provides training and technical assistance that ensures all barriers to the enrollment and retention of children and youth are removed. The training and technical assistance review both state education code and Every Student Succeeds Act requirements for removal of barriers for children and youth experiencing homelessness. These barriers include residency requirements, enrollment records, immunizations, health records and other documentation.[*]

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Appendix 2
About Transforming School Improvement Policy

As John Maynard Keynes stressed: *The real difficulty in changing the course of any enterprise lies not in developing new ideas but in escaping old ones.* That certainly is the case with respect to policy for improving schools.

Education policy currently reflects a primary commitment to finding ways to improve (1) instruction and (2) management/governance. This two component framework works fine for schools where few students encounter barriers to success. And some significant strides have been made with respect to both components. However, the framework is grossly insufficient for addressing the complex array of factors interfering with equity of opportunity for student success at schools, especially schools enrolling large numbers from economically disadvantaged homes. Reformers need to escape the idea that the two component emphasis is sufficient to the challenge of addressing the many factors interfering with school improvement and student progress.

In response to the number of schools and students in trouble, the need is for fundamental system transformation. Critical in this respect is expanding the policy framework for school improvement to add a third primary and essential component. This component is devoted to unifying and developing a comprehensive and equitable intervention system for addressing barriers to learning and teaching and re-engaging disconnected students. That is, in place of ad hoc and piecemeal policies and practices, this third component provides a foundation for transforming student and learning supports. Currently, states and districts are trending toward using the term "Learning Supports" to cover the range of activity encompassed by this third component.

The transformation involves first unifying and weaving together all school resources currently expended for student and learning supports. *And then*, the focus is on discriminatively braiding school and relevant community resources together to fill gaps. The intent over time is to replace the current laundry-list of fragmented practices by developing a unified, comprehensive, and equitable system that can serve all students.

Systemic change of this magnitude involves social, political, and cultural commitment to:

(1) Expanding the policy framework for school improvement from a two- to a three-component framework so that all efforts to address barriers to learning and teaching are unified (e.g., as a Learning Support Component), with the third component prioritized and developed as primary and essential, and fully entwined with the Instructional and Management/governance Components.[1]
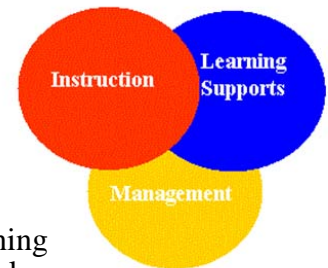
(2) Operationalizing the third component by reframing student and learning support interventions to create a unified, comprehensive, and equitable system of learning supports in-classrooms and school-wide. As illustrated below, a prototype intervention framework has been developed that encompasses

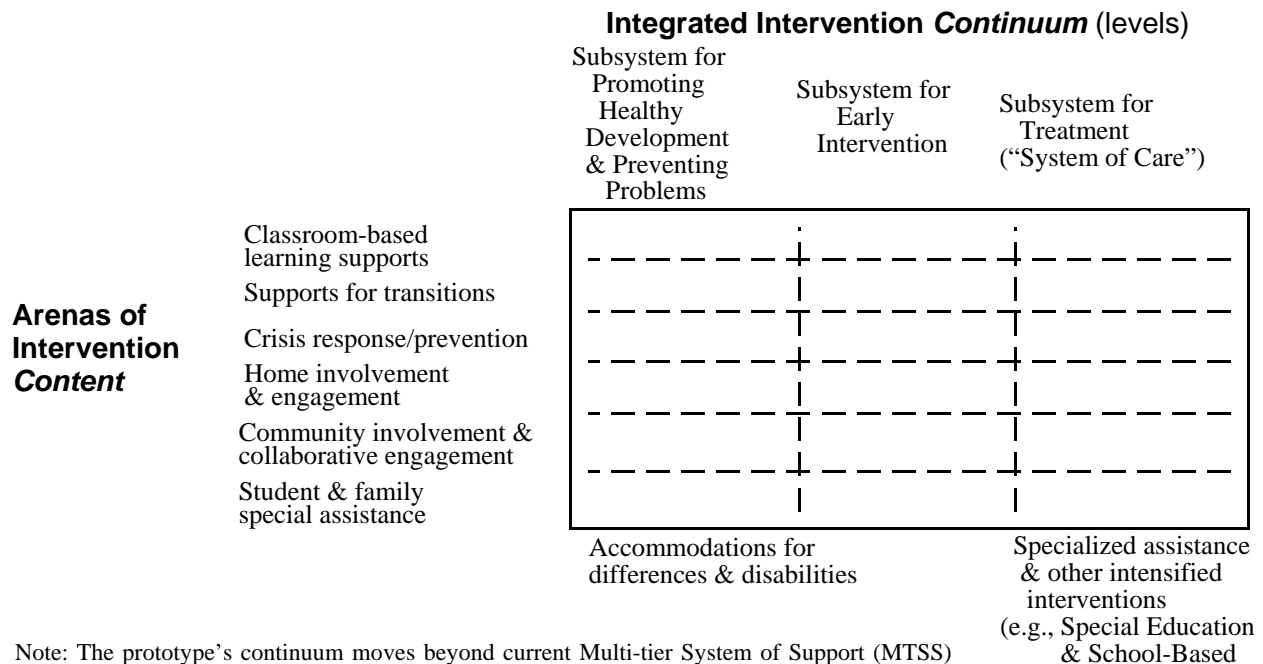>*a continuum of school-community interventions* consisting of subsystems for
- promoting effective schooling and whole child development
- preventing problems experienced by teachers and students
- addressing such problems as soon as feasible after they arise
- providing for students who have severe and chronic problems.

and

>*a cohesively organized and delimited set of "content" arenas* for addressing barriers to learning and teaching and re-engaging disconnected students in the classroom and school-wide. These arenas encompass the range of concerns a school copes with each day.[2]

Prototype Intervention Framework
  for the Third Component

Integrated Intervention *Continuum* (levels)

	Subsystem for Promoting Healthy Development & Preventing Problems	Subsystem for Early Intervention	Subsystem for Treatment ("System of Care")

Arenas of Intervention *Content*

- Classroom-based learning supports
- Supports for transitions
- Crisis response/prevention
- Home involvement & engagement
- Community involvement & collaborative engagement
- Student & family special assistance

Accommodations for differences & disabilities

Specialized assistance & other intensified interventions (e.g., Special Education & School-Based)

Note: The prototype's continuum moves beyond current Multi-tier System of Support (MTSS) thinking by being one facet of an intervention framework that guides development of a total system designed to unify the resources a school devotes to student and learning supports and blending in community resources to fill critical gaps. The above matrix provides a tool for mapping existing resources, analyzing gaps, and deciding on priorities for system development.

(3) Implementing the Third Component involves

- *reworking the operational infrastructure* to ensure effective daily implementation and ongoing development of a unified and comprehensive system for addressing barriers to learning and teaching;[3]

- *enhancing mechanisms and strategic approaches for systemic change* in ways that ensure effective implementation, replication to scale, and sustainability;[4]

- *developing standards and expanding the accountability framework* to account for the third component and to do so in ways that encompass both formative and summative evaluation.[5]

As noted above, successful transformation requires effective coping with the politics of enactment and implementation and building on lessons learned from previous and ongoing endeavors.[6] None of this is easy, but given the degree to which public education is under attack, all of it is essential.

About the term *Learning Supports*

Learning supports are defined as the resources, strategies, and practices that provide physical, social, emotional, and intellectual supports to enable all students to have an equal opportunity for success at school by directly addressing barriers to learning and teaching.

Learning supports are designed to (1) directly address interfering factors *and* (2) do so in a way that re-engages students in classroom instruction. Attention to both these matters is essential because, in general, interventions that do not ensure a student's meaningful engagement in classroom learning are insufficient in sustaining student involvement, good behavior, and effective learning at school. In the classroom and school-wide, such supports encompass efforts to reduce the overemphasis on using extrinsic reinforcers and enhance an emphasis on *intrinsic motivation* to promote engagement and re-engagement.

Notes

[1] See Chapter 2 in *Transforming Student and Learning Supports: Developing a Unified, Comprehensive, and Equitable System* (2015). H.S. Adelman & L. Taylor. Los Angeles: Center for Mental Health in Schools. http://smhp.psych.ucla.edu/pdfdocs/book/book.pdf .

[2] A brief discussion of and examples related to each of the six content arenas we have categorized is offered in Part II of *Transforming Student and Learning Supports: Developing a Unified, Comprehensive, and Equitable System* (2015). H.S. Adelman & L. Taylor. Los Angeles: Center for Mental Health in Schools. http://smhp.psych.ucla.edu/pdfdocs/book/book.pdf . States and districts that adopt the framework sometimes rename one or more of the arenas.

[3] See *Key Leadership Infrastructure Mechanisms for Enhancing Student & Learning Supports* – http://smhp.psych.ucla.edu/pdfdocs/report/resource_oriented_teams.pdf .

[4] See *Bringing New Prototypes into Practice: Dissemination, Implementation, and Facilitating Transformation* – http://smhp.psych.ucla.edu/pdfdocs/implrep3.pdf .

[5] For an accountability prototype that focuses not only on achievement, but on personal and social development and on improvements that directly address barriers to learning and teaching, see"Expanding the Accountability Framework for Schools" Appendix A in *Transforming Student and Learning Supports: Developing a Unified, Comprehensive, and Equitable System* (2015). H.S. Adelman & L. Taylor. Los Angeles: Center for Mental Health in Schools. http://smhp.psych.ucla.edu/pdfdocs/book/book.pdf .
 For a prototype of standards and indicators for a learning supports component, see *Standards & Quality Indicators for an Enabling or Learning Supports Component* (2014). Los Angeles: Center for Mental Health in Schools. http://smhp.psych.ucla.edu/summit2002/qualityindicators.pdf .

[6] See examples and lessons learned in *Where's it Happening?* – http://smhp.psych.ucla.edu/summit2002/nind7.htm

Other relevant references can be accessed through links provided in the Center's Online Clearinghouse Quick Finds – see http://smhp.psych.ucla.edu/quicksearch.htm .