State of Arizona
Consolidated State Application Accountability Workbook

for State Grants under Title IX, Part C, Section 9302 of the Elementary and Secondary Education Act (Public Law 107-110)

Revised June 5, 2003
Final Submission

Submitted to:

U. S. Department of Education
Office of Elementary and Secondary Education
Washington, D.C. 20202

Instructions for Completing Consolidated State Application Accountability Workbook

By January 31, 2003, States must complete and submit to the Department this Consolidated State Application Accountability Workbook. We understand that some of the critical elements for the key principles may still be under consideration and may not yet be final State policy by the January 31 due date. States that do not have final approval for some of these elements or that have not finalized a decision on these elements by January 31 should, when completing the Workbook, indicate the status of each element which is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Transmittal Instructions

To expedite the receipt of this Consolidated State Application Accountability Workbook, please send your submission via the Internet as a .doc file, pdf file, rtf or .txt file or provide the URL for the site where your submission is posted on the Internet. Send electronic submissions to conapp@ed.gov.

A State that submits only a paper submission should mail the submission by express courier to:

Celia Sims
U.S. Department of Education
400 Maryland Ave., SW
Room 3W300
Washington, D.C. 20202-6400
(202) 401-0113

PART I: Summary of Required Elements for State Accountability Systems

Instructions

The following chart is an overview of States' implementation of the critical elements required for approval of their State accountability systems. States must provide detailed implementation information for each of these elements in Part II of this Consolidated State Application Accountability Workbook.

For each of the elements listed in the following chart, States should indicate the current implementation status in their State using the following legend:

F: State has a final policy, approved by all the required entities in the State (e.g., State Board of Education, State Legislature), for implementing this element in its accountability system.

P: State has a proposed policy for implementing this element in its accountability system, but must still receive approval by required entities in the State (e.g., State Board of Education, State Legislature).

W: State is still working on formulating a policy to implement this element in its accountability system.

Summary of Implementation Status for Required Elements of State Accountability Systems

Status		State Accountability System Element
Principle 1: All Schools		
P	1.1	Accountability system includes *all schools and districts in the state*.
F	1.2	Accountability system holds *all schools to the same criteria*.
F	1.3	Accountability system incorporates the *academic achievement standards*.
P	1.4	Accountability system provides *information in a timely manner*.
F	1.5	Accountability system includes *report cards*.
P	1.6	Accountability system includes *rewards and sanctions*.
Principle 2: All Students		
P	2.1	The accountability system includes *all students*
P	2.2	The accountability system has a consistent definition of *full academic year*.
F	2.3	The accountability system properly includes *mobile students*.
Principle 3: Method of AYP Determinations		
F	3.1	Accountability system expects *all student subgroups, public schools, and LEAs to reach proficiency by 2013-14*.
P	3.2	Accountability system has a method for determining whether *student subgroups, public schools, and LEAs made adequate yearly progress.*
P	3.2a	Accountability system establishes a *starting point*.
P	3.2b	Accountability system establishes *statewide annual measurable objectives*.
P	3.2c	Accountability system establishes *intermediate goals*.
Principle 4: Annual Decisions		
P	4.1	The accountability system *determines annually the progress* of schools and districts.

STATUS Legend:
F – Final state policy
P – Proposed policy, awaiting State approval
W – Working to formulate policy

Principle 5: Subgroup Accountability

P	5.1	The accountability system *includes all the required student subgroups*.
P	5.2	The accountability system holds *schools and LEAs accountable for the progress of student subgroups*.
F	5.3	The accountability system includes *students with disabilities*.
P	5.4	The accountability system includes *limited English proficient students*.
F	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based *primarily on academic assessments*.

Principle 7: Additional Indicators

F	7.1	Accountability system includes *graduation rate for high school*s.
F	7.2	Accountability system includes an *additional academic indicator for elementary and middle school*s.
F	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

P	8.1	Accountability system holds students, schools and districts separately accountable for *reading/language arts* and *mathematics*.

Principle 9: System Validity and Reliability

F	9.1	Accountability system produces *reliable decisions*.
F	9.2	Accountability system produces *valid decisions*.
F	9.3	State has a plan for addressing *changes in assessment and student population*.

Principle 10: Participation Rate

P	10.1	Accountability system has a means for calculating the *rate of participation* in the statewide assessment.
P	10.2	Accountability system has a means for *applying the 95% assessment criteria to student subgroups and small schools.*

STATUS Legend:
F – Final policy
P – Proposed Policy, awaiting State approval
W– Working to formulate policy

PART II: State Response and Activities for Meeting State Accountability System Requirements

Instructions

In Part II of this Workbook, States are to provide detailed information for each of the critical elements required for State accountability systems. States should answer the questions asked about each of the critical elements in the State's accountability system. States that do not have final approval for any of these elements or that have not finalized a decision on these elements by January 31, 2003, should, when completing this section of the Workbook, indicate the status of each element that is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

PRINCIPLE 1. A single statewide Accountability System applied to all public schools and LEAs.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.1 How does the State Accountability System include every public school and LEA in the State?	Every public school and LEA is required to make adequate yearly progress and is included in the State Accountability System. State has a definition of "public school" and "LEA" for AYP accountability purposes. • The State Accountability System produces AYP decisions for all public schools, including public schools with variant grade configurations (e.g., K-12), public schools that serve special populations (e.g., alternative public schools, juvenile institutions, state public schools for the blind) and public charter schools. It also holds accountable public schools with no grades assessed (e.g., K-2).	A public school or LEA is not required to make adequate yearly progress and is not included in the State Accountability System. State policy systematically excludes certain public schools and/or LEAs.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

Under Arizona Revised Statute (A.R.S.) §15-241 (AZ LEARNS), public elementary schools [grades K-8, or most combinations of those grades] and public secondary schools [grades 9-12, or any combination of those grades] are included in the state's accountability system and are required to make the federal definition of adequate yearly progress (AYP) as detailed in the No Child Left Behind Act of 2001 (NCLB). Arizona's single statewide accountability system will include both Title I and non-Title I schools (traditional schools, charter schools, alternative schools, and new schools). The Arizona Department of Education (ADE) will propose to the Arizona State Board of Education in April 2003 to evaluate all K-2 public schools based on assessment (AIMS) results of the school into which their students feed. For example, the AYP determination for a K-2 school will be based on the third (3rd) grade assessment results of the three (3) through six (6) [or any other grade combination] school in which students will eventually enroll. Evaluation of these schools will begin during the 2002-2003 academic year.

The ADE will include all public schools, all student subgroups (e.g. major racial and ethnic groups, limited English proficiency students, economically disadvantaged students, and students with disabilities) and districts in the statewide accountability system by completing an Achievement Profile analysis for each entity. A core component of the Achievement Profile analysis is the determination of Adequate Yearly Progress (AYP). The ADE will determine whether a school has made AYP or failed to make AYP based on the criteria established under NCLB [Title I, Part A, Section 1111 (2) (B-I)] provided the subgroup meets the minimum analysis size of thirty (30) pupils. In accordance to Section 1116 (Title I, No Child Left Behind Act) any school receiving Title I funds will be placed in federal school improvement after failing to make AYP for a second consecutive year.

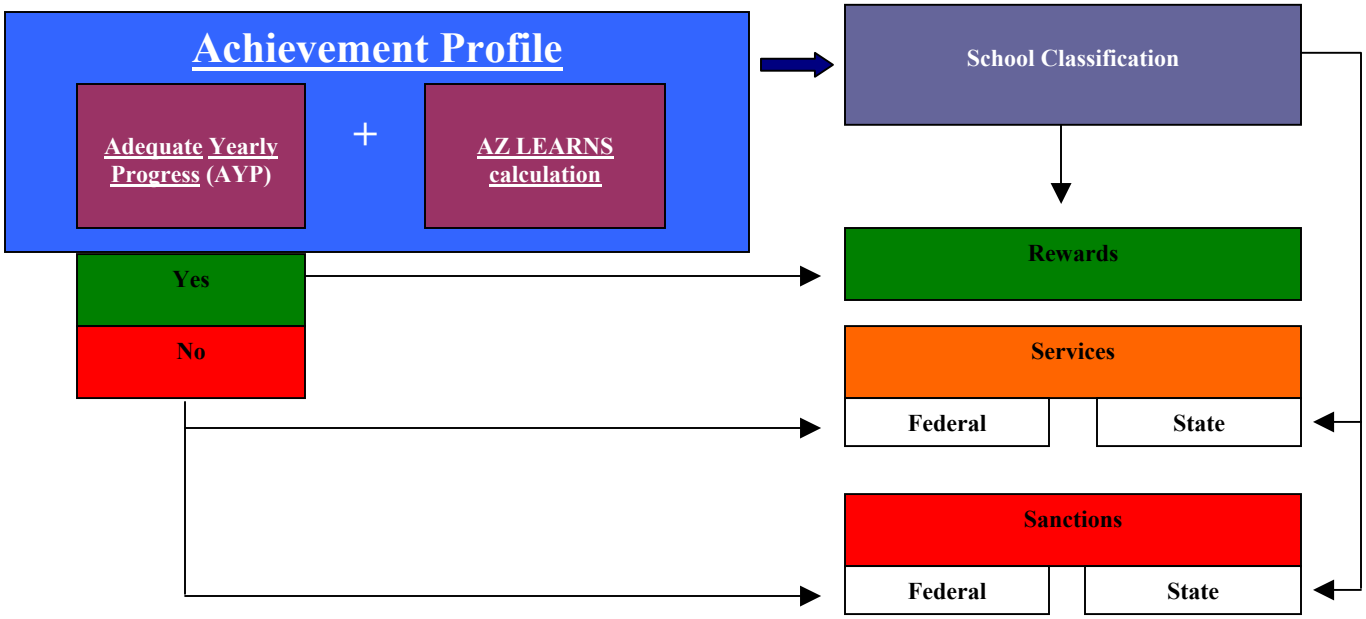
CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?	All public schools and LEAs are systematically judged on the basis of the same criteria when making an AYP determination. If applicable, the AYP definition is integrated into the State Accountability System.	Some public schools and LEAs are systematically judged on the basis of alternate criteria when making an AYP determination.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The ADE will include all public schools and districts in the statewide accountability system by completing an Achievement Profile analysis for each entity. A core component of the Achievement Profile analysis is the determination of Adequate Yearly Progress (AYP). An AYP determination will be made for each public school and district as required by the No Child Left Behind Act of 2001 (NCLB).

As stated above, the Arizona Department of Education must compile an annual Achievement Profile, as detailed in A.R.S. § 15-241, which will be used to determine a school classification that designates each public school as one of the following 1.) Excelling; 2.) Improving; 3.) Maintaining [Adequate Performance]; 4.) Underperforming; and 5.) Failing. It should be noted that proposed legislation effectively modifies these designations. The proposed definitions are modified as follows: 1.) Excelling; 2.) Highly Performing; 3.) Performing; 4.) Underperforming; and 5.) Failing.

The determination of all school site designations/classifications (through the Achievement Profile) will be made on the analysis of the following measures (please refer to Table A below):

Table A: **Arizona's Single Statewide Accountability System**



The model detailed above fully integrates NCLB stipulations for AYP and state accountability requirements. Depending on classification, a school will be included in the rewards system or will face sanctions, which may require them to deliver services to eligible students (depending on federal and/or state statute). Regardless of a school classification, a Title I school determined not to have made AYP will be required to implement federal services and undergo the necessary sanctions prescribed by NCLB. **In no way does the integration of AYP into the Achievement Profile compensate or diminish the effect of NCLB legislation**. The Arizona Department of Education strongly believes that the integration of AYP into the Achievement Profile (illustrated on page 8) ensures that schools, districts and the state will maintain focus on the federal requirements outlined in NCLB.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.3 Does the State have, at a minimum, a definition of *basic*, *proficient* and *advanced* student achievement levels in reading/language arts and mathematics?	State has defined three levels of student achievement: *basic*, *proficient* and *advanced*.[1] Student achievement levels of *proficient* and *advanced* determine how well students are mastering the materials in the State's academic content standards; and the *basic* level of achievement provides complete information about the progress of lower-achieving students toward mastering the *proficient* and *advanced* levels.	Standards do not meet the legislated requirements.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Arizona has defined four levels of student achievement (performance/achievement standards) in reading and math:
1.) Exceeds the Standard **[Advanced]**; 2.) Meets the Standard **[Proficient]**; 3.) Approaches the Standard; and 4.) Falls Far Below the Standard.

Exceeds the Standard This level denotes demonstration of superior academic performance evidenced by achievement substantially beyond the expected goal of all students.

Meets the Standard This level denotes demonstration of solid academic performance on challenging subject matter reflected by the content standards. This includes knowledge of subject matter, application of such knowledge to real-world situations, and content relevant analytical skills. Attainment of at least this level is the expectation for all Arizona students.

Approaches the Standard This level denotes understanding of the knowledge and application of the skills that are fundamental for proficiency in the standards.

Falls Far Below the Standards This level denotes sufficient evidence that the prerequisite knowledge and skills needed to approach the standard have not been met. Students who perform at this level have serious gaps in knowledge in skills related to Arizona's Academic Standards.

For a more detailed definition of each performance level associated with the content areas of reading and mathematics, please refer to: www.ade.az.gov/standards/aims/PerformanceStandards/performancelevels.asp

For a more detailed explanation of how the achievement standards are incorporated into Arizona's accountability system (AZ LEARNS), please refer to the AZ LEARNS Technical Manual.

[1] System of State achievement standards will be reviewed by the Standards and Assessments Peer Review. The Accountability Peer Review will determine that achievement levels are used in determining AYP.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.4 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?	State provides decisions about adequate yearly progress in time for LEAs to implement the required provisions before the beginning of the next academic year. State allows enough time to notify parents about public school choice or supplemental educational service options, time for parents to make an informed decision, and time to implement public school choice and supplemental educational services.	Timeline does not provide sufficient time for LEAs to fulfill their responsibilities before the beginning of the next academic year.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Presently, the Arizona Department of Education (ADE) produces Achievement Profiles for each public elementary and secondary school by October 15 of each year. The October 15th deadline provides the necessary time to validate all relevant calculations and to conduct the necessary analyses. To promote the timely release of relevant data, the ADE has developed a secure online application for LEAs and schools to access and download Achievement Profile results, reports, data, and calculations. The availability of an on-line application reduces the amount of time required to disseminate this information to LEAs and schools by eliminating the need for printing, copying, and mailing. LEAs and schools will have direct access to the information necessary for them to inform parents of enrolled students attending schools identified for school improvement of the school's status, the option of transfer, and supplemental education services as required by the No Child Left Behind Act of 2001 in a more timely manner.

Schools designated as *Underperforming* under the 2002 Achievement Profile were required to notify all community members residing within each school's respective attendance area of its status and improvement efforts (including actions prescribed in Title I, Section 1116 of the No Child Left Behind Act). Title I schools receiving an Underperforming classification and therefore determined to have not made AYP were immediately placed in the first year of federal school improvement. As such, these schools were required to provide choice options for eligible students and are expected to continue to do so during the 2003-2004 academic year in accordance with NCLB regulations.

Beginning with the 2002-2003 Adequate Yearly Progress determination, the Arizona Department of Education (ADE) will no longer place Title I schools into federal school improvement based on a single Underperforming designation. Rather, the ADE will implement the NCLB timeline, which requires a school to fail to make AYP for two consecutive years prior to being placed into federal school improvement. With this said, the ADE will release the 2002-2003 Adequate Yearly Progress (AYP) determinations and related data to all schools no later than the Friday prior to Labor Day. This will ensure that Title I schools may notify parents of enrolled students of the school's AYP determination and offer the option of transfer and supplemental services if necessary in a timely manner as mandated by Title I, Section 1116 of The No Child Left Behind Act of 2001. Title I schools designated as Underperforming on the 2002 Achievement Profile (and automatically in year one of federal school improvement) will be the first to receive 2002-2003 AYP calculations, thus allowing them the opportunity to complete the AYP appeals process within the thirty (30) days outlined in NCLB and offer services to eligible students.

Due to the varying start dates for Arizona schools (year round schedules, charter schools and traditional schools) the ADE will need to determine a "first day of school" for the state. The ADE is negotiating with our testing contractor to facilitate a more expedient return of assessment data, thus allowing the timely release of AYP determinations and related data to schools and districts. Based on the outcome of these negotiations, the ADE intends to provide future preliminary AYP determinations by August 1st and final AYP determinations by September 1st .

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.5 Does the State Accountability System produce an annual State Report Card?	The State Report Card includes all the required data elements [see Appendix A for the list of required data elements]. The State Report Card is available to the public at the beginning of the academic year. The State Report Card is accessible in languages of major populations in the State, to the extent possible. Assessment results and other academic indicators (including graduation rates) are reported by student subgroups	The State Report Card does not include all the required data elements. The State Report Card is not available to the public.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The ADE will produce its first annual state report card prior to the 2003-2004 academic year. It is important to note that the first annual report card will reflect the 2002-2003 academic year and will disaggregate data for the following subgroups: 1.) all students; 2.) race/ ethnicity; 3.) disability; 4.) gender; and 5.) English language learners [ELL]. Currently, the ADE can use Title I school status as a proxy indicator of SES status. Socio-economic status (SES) student subgroup data will be disaggregated in the state report card. However, the ADE will be investigating an appropriate non-test indicator during the 2003-2004 academic year to provide more accurate information regarding this student subgroup.

Arizona currently provides a School Report Card that is available for each public school in the state. These school-level report cards are available on-line and in print at each school. At this time, the information presented in the school-level report cards includes assessment results for AIMS, Stanford 9, and MAP as well as other relevant school information. School-level report cards will be updated in the immediate future to reflect requirements (i.e. assessment data disaggregated by student subgroups) mandated by the No Child Left Behind Act of 2001. The ADE intends to model the state report card based on the information available in the school report card. The ADE plans to provide the information presented on the various report cards in a user-friendly format, primarily through the use of graphs and visual aids. The intent is to provide accurate information in a format that is easily understandable to diverse populations residing within the state. Please refer to the state report card prototype attached.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
1.6 How does the State Accountability System include rewards and sanctions for public schools and LEAs?[2]	State uses one or more types of rewards and sanctions, where the criteria are: • Set by the State; • Based on adequate yearly progress decisions; and, • Applied uniformly across public schools and LEAs.	State does not implement rewards or sanctions for public schools and LEAs based on adequate yearly progress.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Currently, the state's accountability system focuses attention on sanctions associated with the school improvement process. These sanctions include: 1.) public identification of school performance, as determined by the ADE and approved by the Arizona State Board of Education [which could also be viewed as a reward if the school demonstrated positive performance]; 2.) placement into school improvement status [when applicable]; 3.) the development of a school improvement plan; 4.) implementation of the school improvement plan. These sanctions are implemented immediately following a school's designation as Underperforming (or Failing) on the Achievement Profile. It should be noted that Title I schools must also complete additional requirements as mandated by the No Child Left Behind Act of 2001.

The ADE plans to continue to publicly recognize Arizona's Title I distinguished schools and Blue Ribbon Schools. The criteria used to make these determinations will include AYP calculations. The implementation of non-monetary rewards (i.e., school/district recognition certificates, Blue Ribbon Program awards, distinguished Title I schools awards) will be applied for the 2003 Achievement Profile. The ADE strongly desires to expand its reward system and is currently investigating a number of options. Possible additional rewards include but are not limited to:

- Small grants to top schools/districts to enhance academic instruction and curriculum development (based on increased student achievement)
- The use of peer-mentoring to highlight the performance of top schools/districts and enable this leadership to assist in the improvement of lower performing schools

Keeping in mind state budgetary restrictions, the ADE is in active discussions with the business community and various education organizations with regard to developing an expanded system. The ADE will present the system to the Arizona State Board of Education in the fall of 2003 for final approval. Implementation of the expanded rewards system will occur during the 2004-2005 academic year.

[2] The state must provide rewards and sanctions for all public schools and LEAs for making adequate yearly progress, except that the State is not required to hold schools and LEAs not receiving Title I funds to the requirements of section 1116 of NCLB [§200.12(b)(40)].

PRINCIPLE 2. All students are included in the State Accountability System.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
2.1 How does the State Accountability System include all students in the State?	All students in the State are included in the State Accountability System. The definitions of "public school" and "LEA" account for all students enrolled in the public school district, regardless of program or type of public school.	Public school students exist in the State for whom the State Accountability System makes no provision.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

Arizona's Achievement Profile model includes the following public school students:

- Elementary students in grades 3-8, or any combination of these grades
- High school students in grades 10-12, or any combination of these grades

Within the grades evaluated, the following student subgroups are included:

- Special education students
- English language learners
- All major racial and ethnic groups (White, African American, Hispanic, Native American, Asian/Pacific Islander)
- Socio-economic status (SES), Title I data will be used as a proxy indicator

The following public school students will be evaluated beginning with the 2003 Achievement Profile and continuing through to 2013-2014 academic year:

- Students in grade K-2.
- Students enrolled in "extremely small schools".
- Students enrolled in Alternative/Accommodation schools.
- Students enrolled in new schools. The Achievement Profile for "new schools" will be calculated based on data collected from the first year of operation.

These student groups will be included in school wide Adequate Yearly Progress determinations for all schools, LEAs and the State.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
2.2 How does the State define "full academic year" for identifying students in AYP decisions?	The State has a definition of "full academic year" for determining which students are to be included in decisions about AYP. The definition of full academic year is consistent and applied statewide.	LEAs have varying definitions of "full academic year." The State's definition excludes students who must transfer from one district to another as they advance to the next grade. The definition of full academic year is not applied consistently.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The ADE will determine a full academic year by identifying students enrolled at the start of the school year (within the first two weeks of instruction) and those students who are presently enrolled during the first day of administration of AIMS. Students who do not meet this criterion will be accounted for at the LEA level. If a student has not attended the LEA for a full academic year, that student will be accounted for at the state level. The ADE will audit data collected during testing via the Student Details system. This student level tracking system also collects information submitted by schools and districts for school funding purposes. Due to the fact that these data are directly related to school funding, both the ADE and the individual schools are obligated to maintain the accuracy of collected and reported data. The Student Details system is validated and checked for integrity by the ADE on a regular schedule, which ensures that inaccuracies can be corrected in a timely manner.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
2.3 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?	State holds public schools accountable for students who were enrolled at the same public school for a full academic year. State holds LEAs accountable for students who transfer during the full academic year from one public school within the district to another public school within the district.	State definition requires students to attend the same public school for more than a full academic year to be included in public school accountability. State definition requires students to attend school in the same district for more than a full academic year to be included in district accountability. State holds public schools accountable for students who have not attended the same public school for a full academic year.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

In order to determine whether a student has been enrolled for a full academic year the ADE requires students to complete the following non-test indicators on both AIMS and Stanford 9 testing documents:

1.) Did you start the school year at this school?
2.) Number of years in school?
3.) Number of years in district?

These questions will provide the ADE the necessary information required to determine the length of time a student has been enrolled in a school, LEA or the state. The ADE continuously strives to ensure the accuracy of all achievement data. To that end, the ADE conducts mandatory annual pre-test workshops for both SAT 9 and AIMS. All public schools including charter schools are required to attend these workshops. The ADE provides standard instructions with common definitions, which are consistent between SAT 9 and AIMS, to testing coordinators regarding the completion of all non-test indicators. These instructions are also provided for testing coordinators on the ADE web site, http://www.ade.az.gov/standards/downloads/NTI1-12.pdf.

PRINCIPLE 3. State definition of AYP is based on expectations for growth in student achievement that is continuous and substantial, such that all students are proficient in reading/language arts and mathematics no later than 2013-2014.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
3.1 How does the State's definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?	The State has a timeline for ensuring that all students will meet or exceed the State's proficient level of academic achievement in reading/language arts[3] and mathematics, not later than 2013-2014.	State definition does not require all students to achieve proficiency by 2013-2014. State extends the timeline past the 2013-2014 academic year.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

In order to promote compliance with the No Child Left Behind Act of 2001, the Arizona Department of Education (ADE) has adopted an appropriate timeline stipulating that all students demonstrate proficiency in the Arizona Academic Standards no later than the 2013-2014 academic year, as prescribed by federal mandate. It should be noted that this timeline is not mandated by State statute. This timeline will incorporate annual measurable objectives and intermediate goals to facilitate the calculation of the State's definition of adequate yearly progress (AYP). Starting points, annual measurable objectives and intermediate goals are set separately for reading and mathematics for grades three (3), five (5), eight (8), and high school to better facilitate the incorporation of additional assessments into the accountability system. Depending on school configuration, assessed grades/subject combinations are aggregated at the school level. Assessment data is also aggregated at the district level and state level. The AYP determination is based on a conjunctive model. A school, district or the state failing to make AYP for two (2) consecutive years is subject to the consequences for entities receiving Title I funds prescribed under Section 1116 of the No Child Left Behind Act of 2001.

Please refer to charts on pages 26-29.

[3] If the state has separate assessments to cover its language arts standards (e.g., reading and writing), the State must create a method to include scores from all the relevant assessments.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
3.2 How does the State Accountability System determine whether each student subgroup, public school and LEA makes AYP?	For a public school and LEA to make adequate yearly progress, each student subgroup must meet or exceed the State annual measurable objectives, each student subgroup must have at least a 95% participation rate in the statewide assessments, and the school must meet the State's requirement for other academic indicators. However, if in any particular year the student subgroup does not meet those annual measurable objectives, the public school or LEA may be considered to have made AYP, if the percentage of students in that group who did not meet or exceed the proficient level of academic achievement on the State assessments for that year decreased by 10% of that percentage from the preceding public school year; that group made progress on one or more of the State's academic indicators; and that group had at least 95% participation rate on the statewide assessment.	State uses different method for calculating how public schools and LEAs make AYP.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

In determining whether each subgroup, school site, LEA, and the state-as-a whole make adequate yearly progress (AYP), Arizona will determine the percentage of students completing Arizona's Instrument to Measure Standards (AIMS), calculate the percentage of students meeting or exceeding the standard in reading and mathematics and implement the safe harbor provision as mandated by the No Child Left Behind Act of 2001.

Participation Requirements: Schools and districts in which at least ninety-five percent (95%) of students enrolled at the time of the test administration complete the state assessments will meet the AYP standard established in federal statute. Schools and districts in which fewer than ninety-five percent (95%) of any student subgroup complete the state-mandated assessments will not meet the AYP standard, provided that the size of the subgroup meets the minimum number of students required for the analysis, thirty (30) students.

Percentage of Students Meeting or Exceeding the Standard: The ADE will calculate the percentage of students meeting or exceeding the standard in reading and mathematics in order to determine if each subgroup met the annual measurable objectives for each subject/grade. If all student subgroups meet the annual measurable objectives the school is considered to have met the AYP standard. If all student subgroups fail to meet the annual measurable objectives the school is considered to not have met the AYP standard. To ensure that AYP decisions are valid and reliable, the ADE will use confidence intervals for all subgroups, schools, districts and state determinations. The ADE will utilize a 99% confidence level to make valid AYP determinations for each of these groups by subject area (reading and mathematics).

Additional Indicator(s): The ADE will calculate the percentage of students in the aggregate that demonstrate adequate progress on the additional academic indicator (elementary or secondary) or meet the threshold percentage for the additional indicator as determined by the ADE and approved by the Arizona State Board of Education. The additional AYP indicators will be attendance rate at the elementary and middle school/district and graduation rate at the secondary school/district.

Safe Harbor Provision: If a school or LEA fails to meet the annual measurable objective, or if one or more subgroups fail to meet the annual measurable objectives, then a school or LEA is considered to have made AYP if both of the following criteria are met:

1.) the percentage of tested students in a particular subgroup, school, or LEA below the proficient (meets or exceeds the standard) achievement level decreases by at least ten percent (10%) from the proceeding year.

2.) the students in a particular subgroup, school, or LEA either
   - make progress on the additional academic indicator; *or*
   - meet the threshold for the other academic indicator

Please note that rates of adequate progress and threshold percentages for additional AYP indicators will be set by the ADE's Accountability Working Group and are subject to final approval by the Arizona State Board of Education. Upon final approval by the State Board, the ADE will submit adequate progress rates and threshold percentages to the U.S. Department of Education.

According to the No Child Left Behind Act of 2001, if one subgroup does not make adequate yearly progress (AYP), then the whole school has failed to make AYP. This provision requires accurate data collection mechanisms. Unfortunately, the ADE will be required to utilize a proxy indicator to identify students who are economically disadvantaged; Title I status, as identified by student assessment results, will be used until the ADE can develop a more accurate data collection mechanism.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
3.2a What is the State's starting point for calculating Adequate Yearly Progress?	Using data from the 2001-2002 school year, the State established separate starting points in reading/language arts and mathematics for measuring the percentage of students meeting or exceeding the State's proficient level of academic achievement. Each starting point is based, at a minimum, on the higher of the following percentages of students at the proficient level: (1) the percentage in the State of proficient students in the lowest-achieving student subgroup; or, (2) the percentage of proficient students in a public school at the 20th percentile of the State's total enrollment among all schools ranked by the percentage of students at the proficient level. A State may use these procedures to establish separate starting points by grade span; however, the starting point must be the same for all like schools (e.g., one same starting point for all elementary schools, one same starting point for all middle schools…).	The State Accountability System uses a different method for calculating the starting point (or baseline data).

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

In order to compute the starting points for all subjects and grades, all schools in Arizona were ranked in descending order according to the percentage of students in each grade and subject combination that met or exceeded the standard on the State's standards-based assessment, the Arizona Instrument to Measure Standards (AIMS). Then, enrollment counts were paired with each school. The starting points were set at the 20th percentile for student enrollment. This evaluation was based on the baseline data of 2001-2002.

The following table provides the State's starting points for each of the subjects and grades evaluated:

Subject/Grade	Reading	Mathematics
Grade 3	44	32
Grade 5	32	20
Grade 8	31	7
High School	23	10

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
3.2b What are the State's annual measurable objectives for determining adequate yearly progress?	State has annual measurable objectives that are consistent with a state's intermediate goals and that identify for each year a minimum percentage of students who must meet or exceed the proficient level of academic achievement on the State's academic assessments. The State's annual measurable objectives ensure that all students meet or exceed the State's proficient level of academic achievement within the timeline. The State's annual measurable objectives are the same throughout the State for each public school, each LEA, and each subgroup of students.	The State Accountability System uses another method for calculating annual measurable objectives. The State Accountability System does not include annual measurable objectives.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The Arizona Department of Education (ADE) has calculated the annual measurable objectives for each of the subjects and grades assessed by the Arizona's Instrument to Measure Standards (AIMS) and evaluated in the Achievement Profiles. These values are based on data from the 2001-2002 academic year and represent the State's expectation for students, schools, and LEAs in order to comply with all students reaching proficiency no later than 2013-2014 as prescribed by the No Child Left Behind Act of 2001. These annual measurable objectives will utilize the same percent proficient as the most recent intermediate goal.

Arizona will establish separate reading and mathematics annual measurable objectives for grades three (3), five (5), eight (8), and high school that serve to identify a minimum percentage of students (all students and each student subgroup) that must meet or exceed the standard.

The reading and mathematics annual measurable objectives will be applied to each school and LEA, including each subgroup at the each site and LEA, as well as the state-level.

The rationale for setting all annual measurable objectives (and corresponding intermediate goals) in the progressive manner demonstrated in this document is based on <u>three</u> key principles:

1.) The ADE has recently completed a grade-level articulation of Arizona's Academic Content Standards. The progressive setting of annual measurable objectives and corresponding intermediate goals allows schools the necessary time to align these grade-level standards with school curricula/resources and implement these standards via instruction.

2.) The ADE is developing new assessments for grades four (4), six (6), and seven (7) for reading and mathematics, as well as a science assessment to be administered on an annual basis in grades three (3), five (5), eight (8), and high school as mandated by the No Child Left Behind Act of 2001. The progressive setting of annual measurable objectives and intermediate goals allows schools the opportunity to effectively prepare students for these assessments.

3.) Currently, the academic performance of several disaggregated student subgroups is below (in some cases, far below) the state's starting points in reading and mathematics. Many schools and districts have initiated scientifically based research programs and other instructional practices to assist students in this circumstance. In addition, the ADE has implemented a comprehensive K-3 reading program designed to have all students proficient in the state's reading standards by the third grade. By setting the state's annual measurable objectives and corresponding intermediate goals in a progressive manner, schools, districts, and the state are given the necessary time to effectively implement these programs and initiatives, giving students in this circumstance an opportunity to catch up with the aggregated student population as represented by the state's starting points.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
3.2c What are the State's intermediate goals for determining adequate yearly progress?	State has established intermediate goals that increase in equal increments over the period covered by the State timeline. • The first incremental increase takes effect not later than the 2004-2005 academic year. • Each following incremental increase occurs within three years.	The State uses another method for calculating intermediate goals. The State does not include intermediate goals in its definition of adequate yearly progress.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Arizona will establish separate reading and mathematics intermediate goals for grades three (3), five (5), eight (8) and high school that increase in equal increments over the twelve (12) year timeline mandated by the No Child Left Behind Act of 2001. There will be six intermediate goals for each subject/grade combination. The intermediate goals are to take effect with the 2004-2005, 2007-2008, 2010-2011, 2011-2012, 2012-2013, and 2013-2014 academic years.

The intermediate goals for each subject/grade combination will be applied to each school and LEA, including each subgroup at each site and LEA, as well as the state-level.

In order to meet the expectations represented by Arizona's annual measurable objectives and intermediate goals, schools and districts must make significant and continuous improvement. The rationale for setting all annual measurable objectives (and corresponding intermediate goals) in the progressive manner demonstrated in this document is based on three key principles:

1.) The ADE has recently completed a grade-level articulation of Arizona's Academic Content Standards. The progressive setting of annual measurable objectives and corresponding intermediate goal allows schools the necessary time to align these grade-level standards with school curricula/resources and implement these standards via instruction.

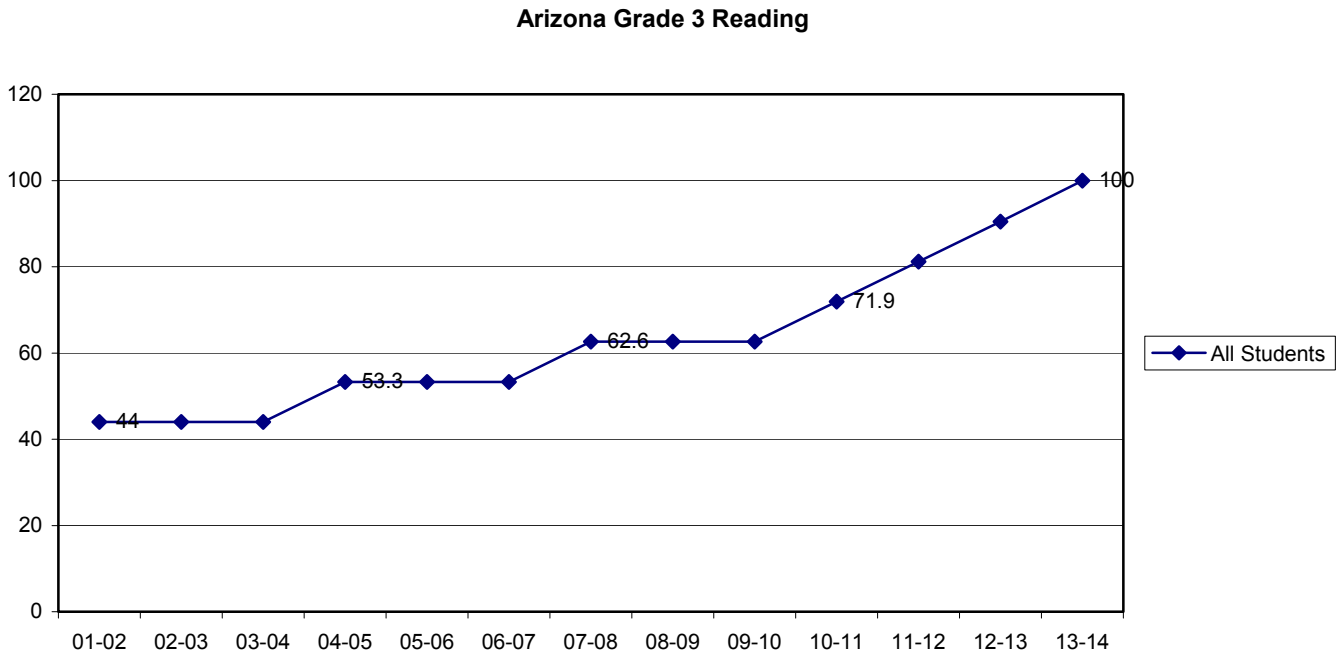
2.) The ADE is developing new assessments for grades four (4), six (6), and seven (7) for reading and mathematics, as well as a science assessment to be administered on an annual basis in grades three (3), five (5), eight (8), and high school as mandated by The No Child Left Behind Act of 2001. The progressive setting of annual measurable objectives and intermediate goals allows schools the opportunity to effectively prepare students for these assessments.

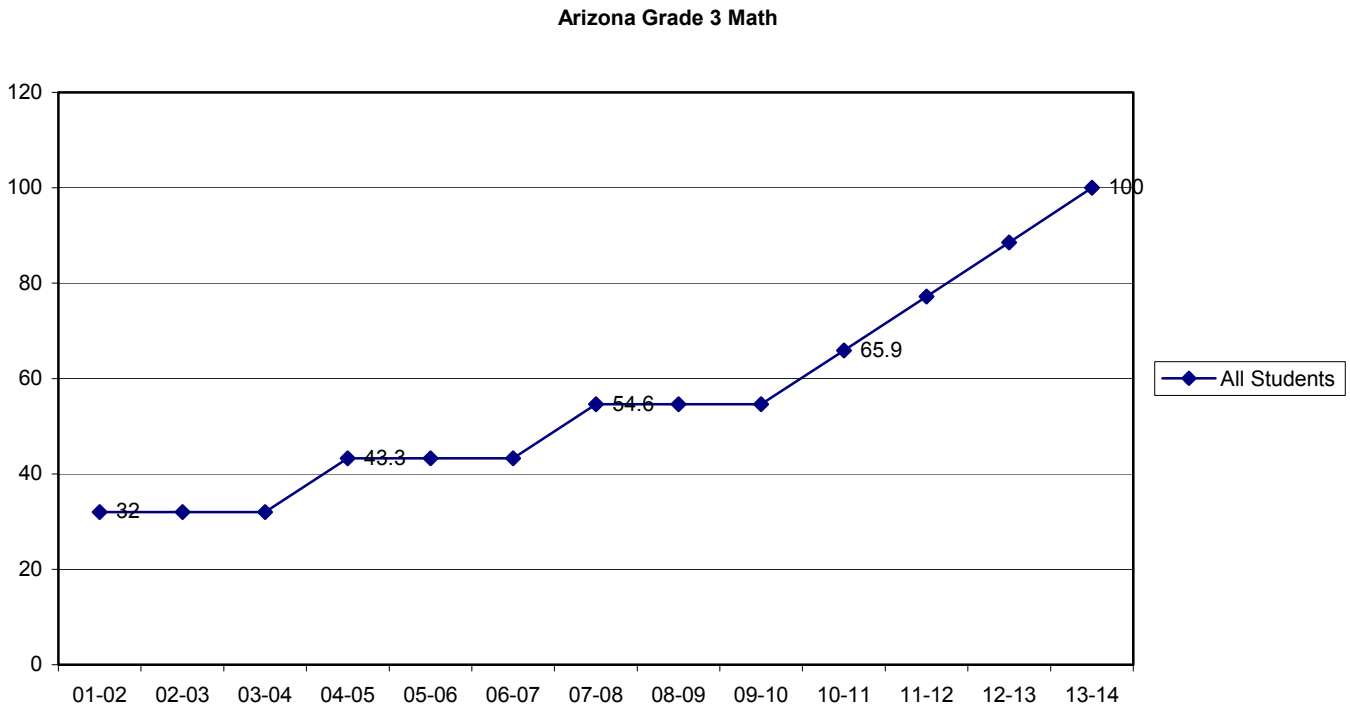
3.) Currently, the academic performance of several disaggregated student subgroups is below (in some cases, far below) the state's starting points in reading and mathematics. Many schools and districts have initiated scientifically based research programs and other instructional practices to assist students in this circumstance. In addition, the ADE has implemented a comprehensive K-3 reading program designed to have all students proficient in the state's reading standards by the third grade. By setting the state's annual measurable objectives and corresponding intermediate goals in a progressive manner, schools, districts, and the state are given the necessary time to effectively implement these programs and initiatives, giving students in this circumstance an opportunity to catch up with the aggregated student population as represented by the state's starting points.

In accordance with the No Child Left Behind Act of 2001, the Arizona Department of Education (ADE) has established the following intermediate goals:

Grade 3	Intermediate Goals	Reading AMO	Reading Proficiency	Math AMO	Math Proficiency
2004-05	1	9.3	53.3 % M/E	11.3	43.3 % M/E
2007-08	2	9.3	62.6 % M/E	11.3	54.6 % M/E
2010-11	3	9.3	71.9 % M/E	11.3	65.9 % M/E
2011-12	4	9.3	81.2 % M/E	11.3	77.2 % M/E
2012-13	5	9.3	90.5 % M/E	11.3	88.5 % M/E
2013-14	6	9.3	100 % M/E	11.3	100 % M/E
Grade 5	**Intermediate Goals**	**Reading AMO**	**Reading Proficiency**	**Math AMO**	**Math Proficiency**
2004-05	1	11.3	43.3 % M/E	13.3	33.3 % M/E
2007-08	2	11.3	54.6 % M/E	13.3	46.6 % M/E
2010-11	3	11.3	65.9 % M/E	13.3	59.9 % M/E
2011-12	4	11.3	77.2 % M/E	13.3	73.2 % M/E
2012-13	5	11.3	88.5 % M/E	13.3	86.5 % M/E
2013-14	6	11.3	100 % M/E	13.3	100 % M/E
Grade 8	**Intermediate Goals**	**Reading AMO**	**Reading Proficiency**	**Math AMO**	**Math Proficiency**
2004-05	1	11.5	42.5 % M/E	15.5	22.5 % M/E
2007-08	2	11.5	54 % M/E	15.5	38 % M/E
2010-11	3	11.5	65.5 % M/E	15.5	53.5 % M/E
2011-12	4	11.5	77 % M/E	15.5	69 % M/E
2012-13	5	11.5	88.5 % M/E	15.5	84.5 % M/E
2013-14	6	11.5	100 % M/E	15.5	100 % M/E
High School	**Intermediate Goals**	**Reading AMO**	**Reading Proficiency**	**Math AMO**	**Math Proficiency**
2004-05	1	12.8	35.8 % M/E	15	25 % M/E
2007-08	2	12.8	48.6 % M/E	15	40 % M/E
2010-11	3	12.8	61.4 % M/E	15	55 % M/E
2011-12	4	12.8	74.2% M/E	15	70 % M/E
2012-13	5	12.8	87 % M/E	15	85 % M/E
2013-14	6	12.8	100 % M/E	15	100 % M/E

The following graphs represent the Arizona Department of Education's starting points, intermediate goals and annual measurable objectives reflected in the previous tables:


Arizona Grade 3 Reading
120
100
80
60
40
20
0
44
53.3
62.6
71.9
100
01-02
02-03
03-04
04-05
05-06
06-07
07-08
08-09
09-10
10-11
11-12
12-13
13-14
All Students


Arizona Grade 3 Math
120
100
80
60
40
20
0
32
43.3
54.6
65.9
100
01-02
02-03
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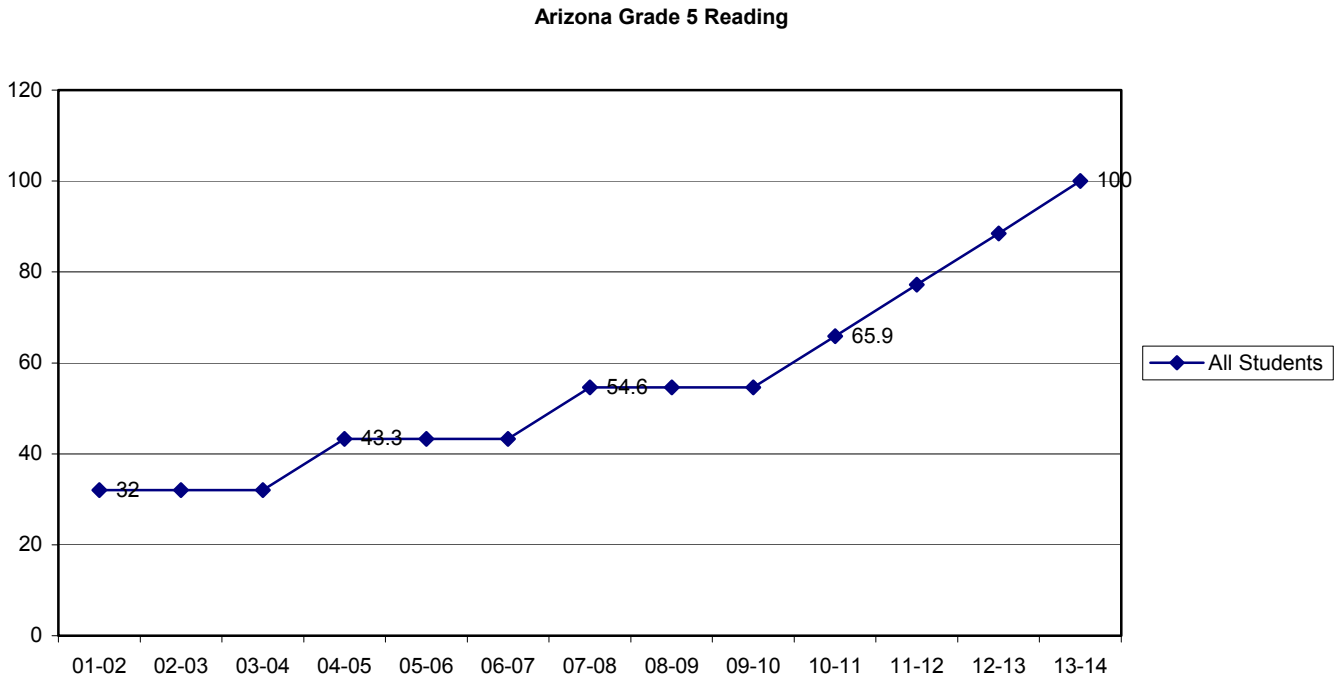
11-12
12-13
13-14
All Students


Arizona Grade 5 Reading
120
100
80
60
40
20
0
32
43.3
54.6
65.9
100
01-02
02-03
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08-09
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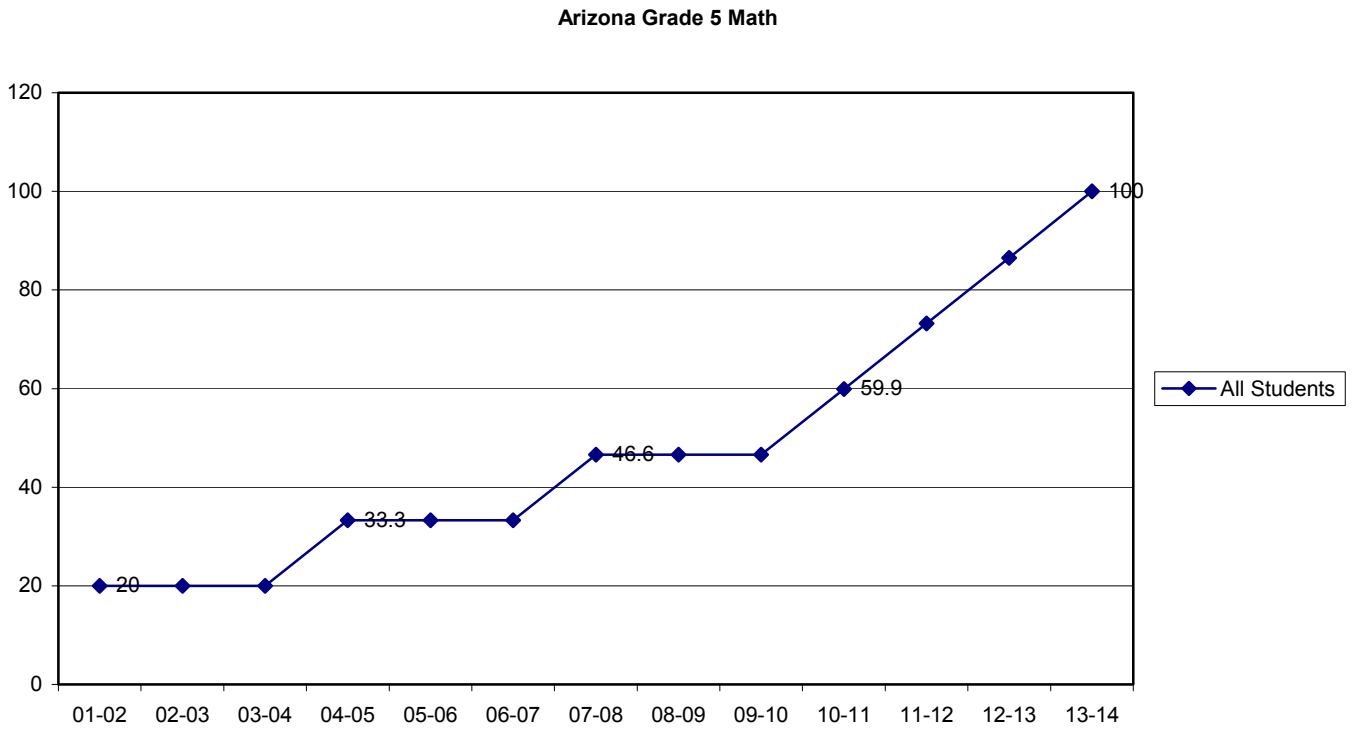
10-11
11-12
12-13
13-14
All Students


Arizona Grade 5 Math
120
100
80
60
40
20
0
20
33.3
46.6
59.9
100
01-02
02-03
03-04
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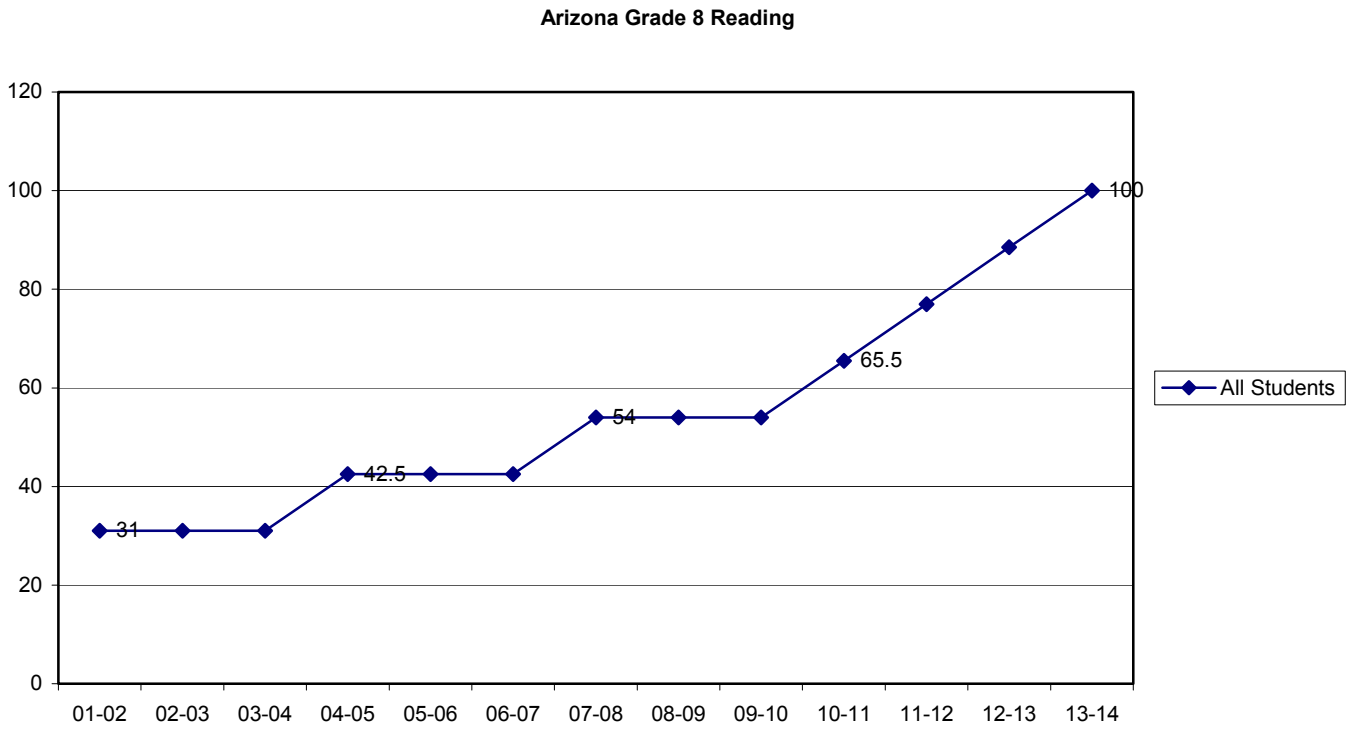
11-12
12-13
13-14
All Students


Arizona Grade 8 Reading
120
100
80
60
40
20
0
31
42.5
54
65.5
100
01-02
02-03
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05-06
06-07
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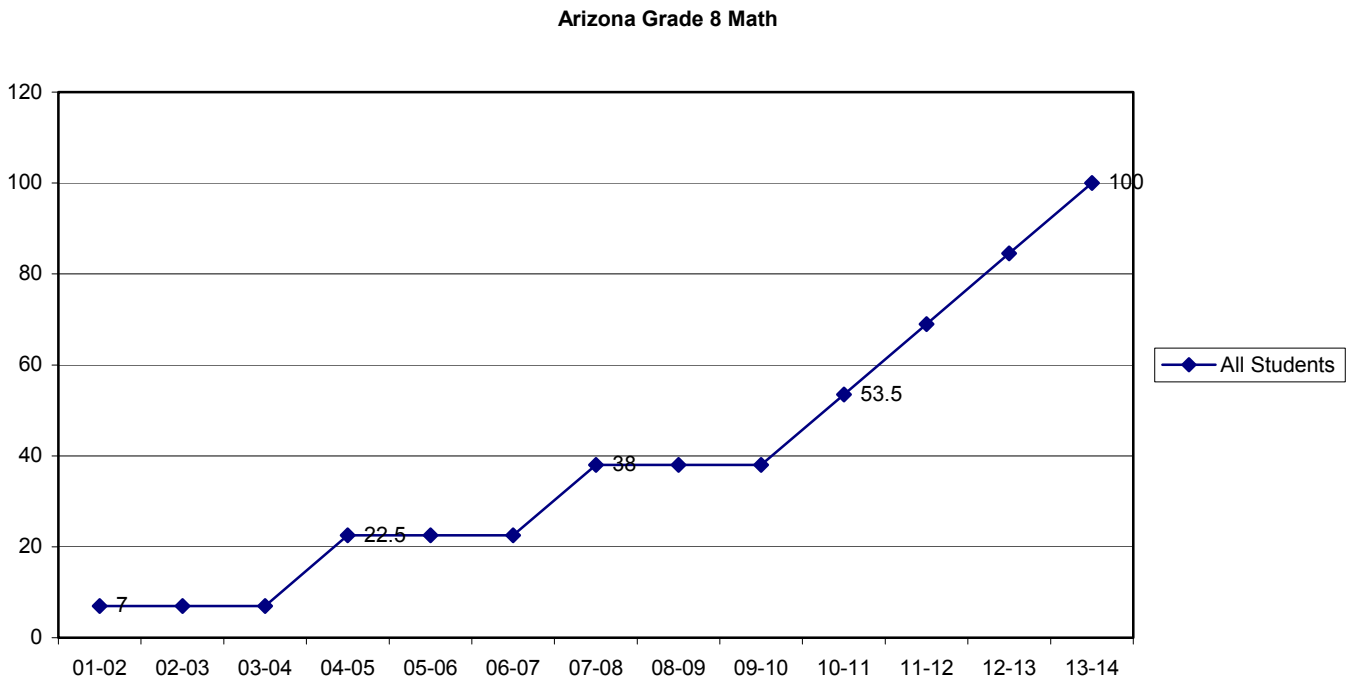
08-09
09-10
10-11
11-12
12-13
13-14
All Students


Arizona Grade 8 Math
120
100
80
60
40
20
0
7
22.5
38
53.5
100
01-02
02-03
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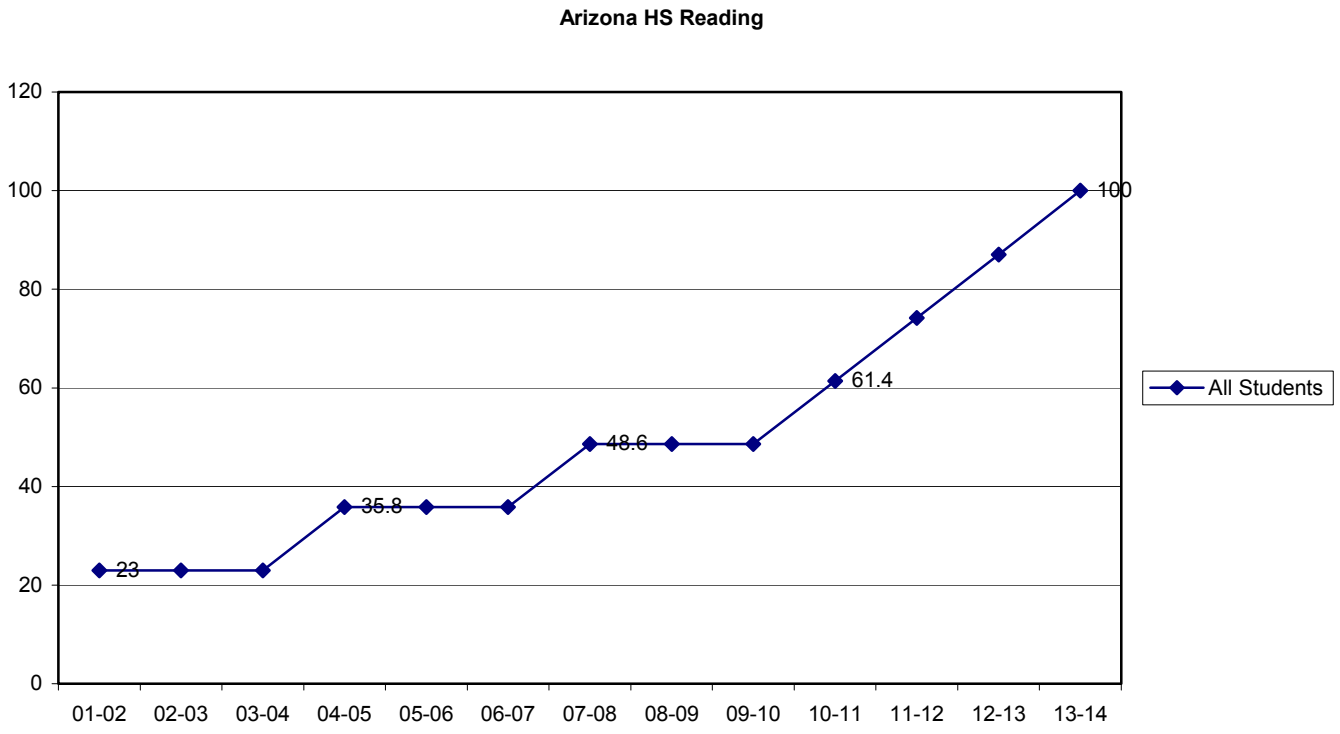
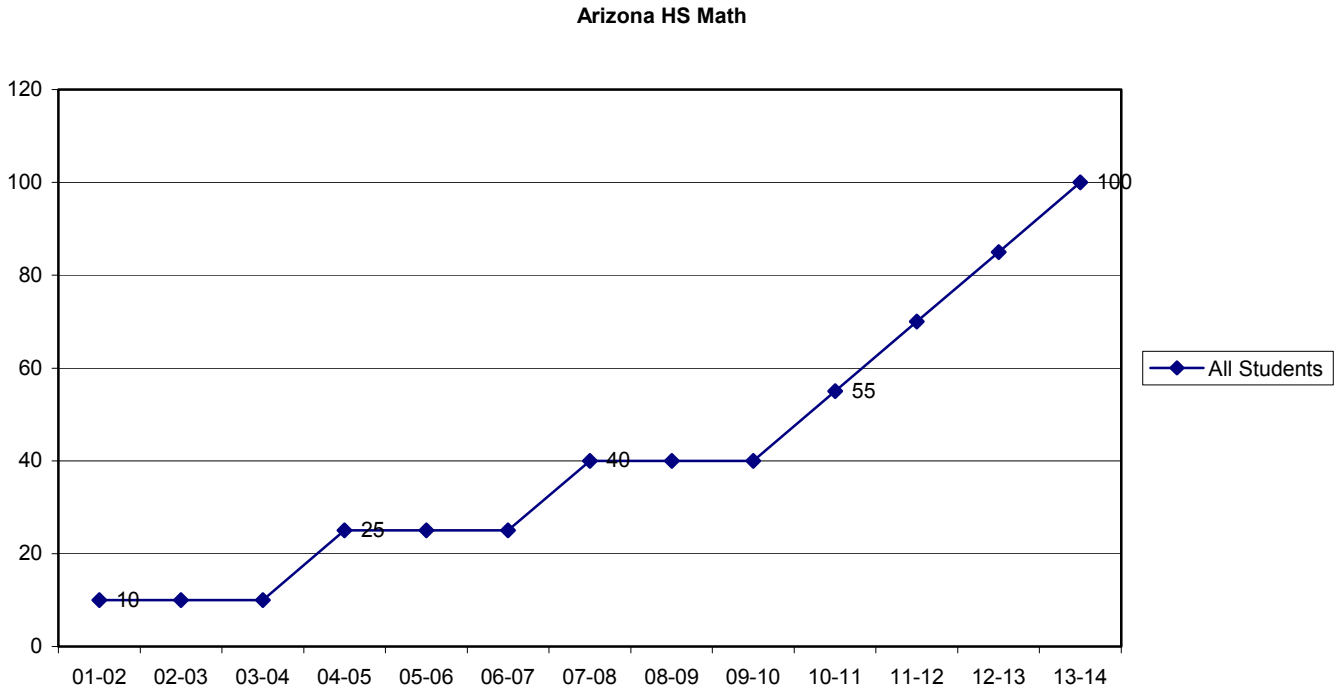
10-11
11-12
12-13
13-14
All Students


Arizona HS Reading
120
100
80
60
40
20
0
23
35.8
48.6
61.4
100
01-02
02-03
03-04
04-05
05-06
06-07
07-08
08-09
09-10
10-11
11-12
12-13
13-14
All Students


Arizona HS Math
120
100
80
60
40
20
0
10
25
40
55
100
01-02
02-03
03-04
04-05
05-06
06-07
07-08
08-09
09-10
10-11
11-12
12-13
13-14
All Students

PRINCIPLE 4. State makes annual decisions about the achievement of all public schools and LEAs.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
4.1 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?	AYP decisions for each public school and LEA are made annually.[4]	AYP decisions for public schools and LEAs are not made annually.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

Arizona's statewide accountability system allows the Arizona Department of Education (ADE) the opportunity to analyze AYP in a manner consistent with the No Child Left Behind Act of 2001. School improvement decisions will be determined based on consecutive years of failing adequate yearly progress (AYP), which will reflect a school's, district's or the state's failure to meet the standard in a particular subject (reading or mathematics). A school or district failing to meet the AMO in the same subject for two (2) consecutive years will be identified for school improvement.

[4] Decisions may be based upon several years of data and data may be averaged across grades within a public school [§1111(b)(2)(J)].

PRINCIPLE 5. All public schools and LEAs are held accountable for the achievement of individual subgroups.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.1 How does the definition of adequate yearly progress include all the required student subgroups?	Identifies subgroups for defining adequate yearly progress: economically disadvantaged, major racial and ethnic groups, students with disabilities, and students with limited English proficiency. Provides definition and data source of subgroups for adequate yearly progress.	State does not disaggregate data by each required student subgroup.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

All public elementary and secondary schools and districts serving such schools will be accountable for the academic performance of student subgroups (race/ethnicity [White, African American, Hispanic, Native American, Asian/Pacific Islander], limited English proficiency students, students economically disadvantaged students, and students with disabilities) through the AYP determination, as long as the disaggregated student subgroup meets the minimum group size requirement.

As described in section 2.2, schools and districts submit individual student-level data, which includes demographic and programmatic information, through the Student Details System (SAIS). Additionally, student demographic information is collected on testing documents for all students and is reported to the ADE. The ADE will utilize this data to make AYP decisions for all schools, LEAs and all required student subgroups.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.2 How are public schools and LEAs held accountable for the progress of student subgroups in the determination of adequate yearly progress?	Public schools and LEAs are held accountable for student subgroup achievement: economically disadvantaged, major ethnic and racial groups, students with disabilities, and limited English proficient students.	State does not include student subgroups in its State Accountability System.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

As noted in section 3.1, student subgroups (as mandated by NCLB requirements) are evaluated for AYP based on the percentage of students completing Arizona's Instrument to Measure Standards (AIMS), and the percentage of students meeting or exceeding the standard in reading and mathematics as determined by the annual measurable objectives, meeting the threshold or demonstrating adequate gain on the additional indicator. The ADE will implement the safe harbor provision as mandated by the No Child Left Behind Act of 2001.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.3 How are students with disabilities included in the State's definition of adequate yearly progress?	All students with disabilities participate in statewide assessments: general assessments with or without accommodations or an alternate assessment based on grade level standards for the grade in which students are enrolled. State demonstrates that students with disabilities are fully included in the State Accountability System.	The State Accountability System or State policy excludes students with disabilities from participating in the statewide assessments. State cannot demonstrate that alternate assessments measure grade-level standards for the grade in which students are enrolled.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The Arizona Instrument to Measure Standards (AIMS) and the Stanford Nine (SAT 9) are administered to all students, regardless of disability. Currently, students with disabilities may participate in statewide assessments either by:

- Receiving accommodations (i.e., presentation format)
- Receiving modifications (i.e., out of level)
- Testing using an Alternate Form (i.e., AIMS Form A)

Arizona State Board of Education Rule (R7-2-401) mandates that all students with disabilities who are educated within Arizona public schools participate in the statewide testing program. Having all students, regardless of disability or group membership, participate in statewide testing will allow for a comprehensive accountability system that includes all students in both district and statewide assessment programs.

For 2002-03 academic year, students with disabilities were permitted to take the standard assessment for a grade level unmatched to the student's chronological age. Scores from out of grade level tests will be reported at the subgroup, school, district and state level. Out-of-level students will be included in the analysis of 95% tested in each school. The resulting scores for out-of-level students will be included into the accountability system's calculation on adequate yearly progress (AYP) as not proficient. A school can appeal an AYP determination if the school fails to make AYP based on the performance of out-of-level testers. **Starting with the 2003-04 school year, no student will be permitted to take an out –of-level or off-level assessment.**

Beginning with the 2003-04 school year, Arizona will require all students with disabilities to participate in the statewide assessment program by taking the regular assessment using standard or non-standard accommodations, or by taking the alternative assessment (no more than 1% of the state population will be included in accountability decisions). The scores for students with disabilities who take the regular assessment with standard or non-standard accommodations will be included with the results of students who take these tests without accommodations. For reporting purposes, the Department will maintain a record of the number of students in each school and district taking assessments with non-standard accommodations. The Department intends to closely monitor schools and districts to ensure the proper use of standard and non-standard accommodations. Please see the attached guidance document (AIMS document 2A).

As indicated above, AIMS A serves as the state's alternate assessment and is only administered to those students with the lowest cognitive abilities. AIMS A measures the performance of students based on an alternative set of state standards. These standards represent functional level skills and abilities. Like AIMS, AIMS A has four associated achievement levels (please refer to attached document titled "Alternate State Achievement Test (ASAT), Student Report Form 9, Standards Status Report Form 2"). The scores for students with disabilities who take the alternate assessment will be included in the assessment data in the accountability system.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.4 How are students with limited English proficiency included in the State's definition of adequate yearly progress?	All LEP student participate in statewide assessments: general assessments with or without accommodations or a native language version of the general assessment based on grade level standards. State demonstrates that LEP students are fully included in the State Accountability System.	LEP students are not fully included in the State Accountability System.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

All limited English proficient (LEP) students will participate in the statewide assessment program (AIMS) designed to measure student proficiency in Arizona's Academic Content Standards. An English learner or limited English proficient student is defined by (A.R.S. §15-751). Currently, a student is no longer considered to be limited English proficient when he/she demonstrates English proficiency on one of four assessments (i.e., LAS, IPT). The Arizona Department of Education will implement a single English Proficiency assessment in 2004 aligned with the State's English proficiency standards, which will be used to make this determination. District governing boards are given the authority to determine whether to allowed appropriate linguistic accommodations to LEP students. Additionally, non-linguistic accommodations will be allowed for LEP students.

Beginning with the 2002-2003 academic year, the Arizona Department of Education will fully include LEP students in AYP determinations as mandated by the No Child Left Behind Act (please refer to Section 3.2).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?	State defines the number of students required in a subgroup for reporting and accountability purposes, and applies this definition consistently across the State.[5] Definition of subgroup will result in data that are statistically reliable.	State does not define the required number of students in a subgroup for reporting and accountability purposes. Definition is not applied consistently across the State. Definition does not result in data that are statistically reliable.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The Arizona Department of Education (ADE) reports assessment data publicly in accordance to Family Educational Rights and Privacy Act (FERPA) regulations. The ADE has determined that the minimum number of students required for reporting *test result data* publicly will be ten (10) students per report.

The State Board has approved the minimum number of students required for accountability purposes, which is set at thirty (30) students. The ADE has completed a preliminary impact analysis based on the racial/ethnic subgroup. This subgroup was chosen because the ADE feels that at this time the data is more reliable than data on any of the other subgroups. Results indicate that 38% or 679 schools would not be evaluated on any of the major racial/ethnic subgroups when the minimum number of students required is set at 30. Many of these schools serve small, rural communities or represent small charter schools. Student subgroups that are not evaluated due to the minimum sample size will be included in student subgroup analyses conducted at the district and state level.

The ADE is currently receiving technical assistance from the Council of Chief State School Officers (CCSSO) to determine the most appropriate methodology to assess extremely small schools. Tentatively, the ADE intends to make AYP determinations for extremely small schools based on aggregate data for the subjects and grades assessed (reading and mathematics). Extremely small schools are defined as having less than 30 students in the baseline year (2001-2002) and having more than 1/3 of its subject/grade values with less than 30 students (153 schools currently). For example a K-6 school would have 4 subject/grade values evaluated (reading and mathematics for grade 3 and 5), 2 of the 4 subject/grade values must have less than 30 students in order to be considered "extremely small". All of the students in the school will be evaluated at the subject level, rather than grade level to make valid and reliable AYP determinations. The ADE will make determinations based on a 99% confidence level to ensure statistical validity.

[5] The minimum number is not required to be the same for reporting and accountability.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?	Definition does not reveal personally identifiable information.[6]	Definition reveals personally identifiable information.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The Arizona Department of Education (ADE) does not report student level data or data that may be used to personally identify students in schools, LEAs or the State. The Achievement Profile is reported at the school level; no student level information is publicly available. The ADE will utilize a methodology that provides a definition of AYP based on all students. Thus, the individual privacy of student subgroups is inherently protected at the school, LEA and State levels. It should be noted that the minimum number for reporting accountability data will be the same as the minimum required for accountability analysis (30 students). The ADE asserts that an N count of thirty (30) represents a stable number for making AYP determinations. Referencing standard statistical methods, 30 students is consistent with the "leveling off" of the effect of sample size, meaning that the benefit of increasing the student group lessens as the value increases. Thirty (30) students is generally considered to be the standard in educational research. Thirty (30) is also consistent with the National Center for Education Statistics (NCES) reporting requirements. When reporting accountability results, the ADE will identify counts in which there are fewer than thirty (30) students by using an asterisks (*). Additionally, the ADE will publicly report values in ranges that obfuscate the actual values enough to prevent calculations, which may result in the ability to discern student level detail from aggregate analysis.

[6] The Family Education Rights and Privacy Act (FERPA) prohibits an LEA that receives Federal funds from releasing, without the prior written consent of a student's parents, any personally identifiable information contained in a student's education record.

PRINCIPLE 6. State definition of AYP is based primarily on the State's academic assessments.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?	Formula for AYP shows that decisions are based primarily on assessments.[7] Plan clearly identifies which assessments are included in accountability.	Formula for AYP shows that decisions are based primarily on non-academic indicators or indicators other than the State assessments.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The ADE will complete an adequate yearly progress (AYP) analysis for all public schools and districts serving such schools. Arizona's definition of adequate yearly progress (AYP) is based primarily on reading and mathematics results on Arizona's Instrument to Measure Standards (AIMS). Although the required additional academic indicators mandated in Section 1111 (b)(2)(C)(vi) of The No Child Left Behind Act of 2001 are part of the AYP analysis, Arizona will examine the percentage of students that complete AIMS, calculate the percentage of students who meet or exceed the standards in reading, and mathematics, and implement the safe harbor provision stipulated by federal statute. AYP determinations will be based on the schools', districts', and State's abilities to meet the following measures.

[7] State Assessment System will be reviewed by the Standards and Assessments Peer Review Team.

PRINCIPLE 7. State definition of AYP includes graduation rates for public High schools and an additional indicator selected by the State for public Middle and public Elementary schools (such as attendance rates).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
7.1 What is the State definition for the public high school graduation rate?	State definition of graduation rate: • Calculates the percentage of students, measured from the beginning of the school year, who graduate from public high school with a regular diploma (not including a GED or any other diploma not fully aligned with the state's academic standards) in the standard number of years; or, • Uses another more accurate definition that has been approved by the Secretary; and • Must avoid counting a dropout as a transfer. Graduation rate is included (in the aggregate) for AYP, and disaggregated (as necessary) for use when applying the exception clause[8] to make AYP.	State definition of public high school graduation rate does not meet these criteria.

[8] See USC 6311(b)(2)(I)(i), and 34 C.F.R. 200.20(b)

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The Graduation Rate is a four-year, longitudinal measure of how many students graduate from high school. Any student who receives a traditional high school diploma within the first four years of starting high school is considered a four (4) year graduate as defined by the Arizona Department of Education's *Graduation Rate Study* (please see attached study). A four (4) year rate is derived from dividing the sum of all four (4) year graduates in each year by the sum of those who should have graduated and did not transfer to another qualified educational facility or die. By examining a cohort of students who began high school at the same time, the graduation rate assesses how many students actually complete high school within a four-year period. It should be noted that this calculation of the graduation rate does not include dropouts as transfer students or those who obtain a Graduate Equivalent Diploma (GED).

$$\text{Graduation Rate} = \frac{\text{Number of Cohort members who graduated after four years}}{\text{Original Cohort Membership} + \text{Transfers In} - \text{Transfers Out} - \text{Deceased}} \times 100$$

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
7.2 What is the State's additional academic indicator for public elementary schools for the definition of AYP? For public middle schools for the definition of AYP?	State defines the additional academic indicators, e.g., additional State or locally administered assessments not included in the State assessment system, grade-to-grade retention rates or attendance rates.[9] An additional academic indicator is included (in the aggregate) for AYP, and disaggregated (as necessary) for use when applying the exception clause to make AYP.	State has not defined an additional academic indicator for elementary and middle schools.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

Arizona's additional indicator for all public elementary and middle schools (grades K-8, or any combination of those grades) for the definition of adequate yearly progress (AYP) is student attendance.

$$\text{Attendance} = \frac{\text{Total attendance days of students}}{\text{Total membership days of students}}$$

Arizona's threshold and gain rates for attendance will be developed and set by Arizona's Accountability Working Group and will be evaluated by the State's Assessment and Accountability Advisory Committee (SAAAC) and Arizona's National Assessment and Accountability Advisory Committee (NAAAC) prior to the recommendation to the State Board of Education. Upon the approval of the threshold and gain rates, the ADE will submit these values to the U.S. Department of Education.

For the purposes of AYP, unless required for the "safe harbor" provision, attendance will be applied at the school and district level, in the aggregate rather than by disaggregated student subgroups. It should be noted that attendance information cannot at this time be disaggregated due to the nature of the data collected. The ADE proposes that for the 2002-2003 calculation of AYP any school not meeting the threshold or rate of adequate gain for meeting the additional indicator requirement will be asked to provide attendance data disaggregated for the purposes of safe harbor and/or the appeals process. A school will be determined to make AYP if the school meets the 95% assessed requirement and the annual measurable objectives for each grade and subject and the safe harbor provision and/or appeals process results in another classification (based on disaggregated data). It is important to note that this proposed plan will be applied for the current academic year, allowing the ADE adequate time to collect enrollment data by student disaggregated subgroups.

[9] NCLB only lists these indicators as examples.

7.3 Are the State's academic indicators valid and reliable?	State has defined academic indicators that are valid and reliable. State has defined academic indicators that are consistent with nationally recognized standards, if any.	State has an academic indicator that is not valid and reliable. State has an academic indicator that is not consistent with nationally recognized standards. State has an academic indicator that is not consistent within grade levels.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Arizona has selected two academic indicators for the elementary (grades K-8 or any combination) and high school Achievement Profile model. Arizona's Instrument to Measure Standards (AIMS) is the primary academic indicator in the elementary and secondary models. It should be noted that AIMS has undergone technical review by Harcourt Brace Educational Measurement (contractor) as well as independent review solicited by the Arizona Department of Education (ADE). This review entailed reliability and validity testing; these tests result in reliability coefficients ranging from .77 to .91 (these values are based on 2002 analysis). A brief description of the process pertaining to the statistical reliability and validity of AIMS is outlined below. For more detailed information please refer to the AIMS Technical manual.

In addition to the involvement of teachers in every step of standards and test development as a primary piece of validity evidence, the following technical studies will be used to determine test score validity and reliability. Reliability is considered to be a piece of validity evidence.

Field test statistics
Item analysis statistics will be used to determine whether a field test item is to be included in the AIMS item bank. Content and bias will be part of the selection criteria. Teacher teams will review item calibrations based on Rasch difficulty estimates and based on traditional difficulties (p-values). Item response distributions will be studied for all respondents, for high-, middle-, and low-ability groups. Point-biserial correlations (item to total correlations) as well as a high/low student response index values are included in the decision-making. Rasch outfit mean squares are used as a between-group measure to evaluate the agreement between the observed item characteristic curve for best fit over ability sub-groups, and Rasch infit mean squares are used as a within-group measure to summarize the degree of misfit remaining within ability groups after between-group misfit has been removed from the total. Differential item functioning (DIF) procedures are used to compare subgroup performance to a reference group. A generalized Mantel-Haenel chi-square procedure will be used to assess DIF.

AIMS item bank
All items that are determined to be of operational quality will be put into the AIMS item bank and will carry all related statistics and history in terms of test forms. Information stored in the item bank includes for each item the item code, grade level, content area, performance objective, concept, strand, field test date, test form, and item statistics.

Equating and scale score derivation procedures
To ensure that students taking one form of a test are neither advantaged nor disadvantaged, common items on each form of AIMS are used to equate test forms. A common item, non-equivalent groups design is used for collecting data. The Rasch model is used to obtain parameter estimates. This procedure will result in the item parameters for all forms being on the same ability scale.

Reliability of test scores
Test score reliability coefficients will be produced using a stratified coefficient alpha for constructed responses, and Kuder-Richardson Formula 20 and Cronbach Alpha coefficients for selected response items. Standard errors of measure will be provided. Within form correlations and between multiple choice and constructed-response for each set of AIMS will be calculated.

Decision consistency and pass score accuracy
The accuracy of a decision to classify a student as above or below the standard cut score is the extent to which the decision would agree with decisions that would be made if each student could somehow be tested with all possible parallel forms of a test form.

The consistency of the decision is the extent to which it would agree with the decisions that would be made if the students had taken a different form of the test, equal in difficulty and covering the same content as the form they actually took. Statistical analyses will be used to estimate the accuracy and consistency of the decisions for passing. Decision tables will be provided showing cells with correct classifications and misclassifications (false positives and false negatives) for test forms taken.

Ongoing validity studies to provide test score validity evidence
The National Assessment and Accountability Advisory Committee, consisting of nationally recognized measurement consultants Joe Ryan, Bill Mehrens, Jim Popham, Tom Haladyna, and Jerry D'Agostino provide, guidance on all aspects of AIMS development including validity studies. Jerry D'Agostino has a contract with the Arizona Department of Education to conduct a series of validity studies including content, curricula, and construct validity studies. The Department's assessment and research units will conduct additional studies.

A State Assessment and Accountability Advisory Committee meets regularly with the state director of assessment to provide input and recommendations regarding the state's testing program. This committee deals primarily with local issues. Two members of the state committee are representatives to the national committee. One member of the national committee is a representative to the state committee.

Based on the reliability and validity studies of AIMS and the cooperation of the state's advisory committees to continue to consult on validity studies, the ADE is confident that the AZ LEARNS component of the Achievement Profiles is both valid and reliable. It is still unclear whether the AYP determinations that will be made for the 2003 Achievement Profiles are valid or reliable. The ADE intends to utilize its resources, NAAAC, SAAAC and the Technical Advisory committee, to conduct validity studies based on the results of this year's (2003) Achievement Profiles.

PRINCIPLE 8. AYP is based on reading/language arts and mathematics achievement objectives.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
8.1 Does the state measure achievement in reading/language arts and mathematics separately for determining AYP?	State AYP determination for student subgroups, public schools and LEAs separately measures reading/language arts and mathematics. [10] AYP is a separate calculation for reading/language arts and mathematics for each group, public school, and LEA.	State AYP determination for student subgroups, public schools and LEAs averages or combines achievement across reading/language arts and mathematics.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The Arizona Department of Education (ADE) calculates an Achievement Profile based on the separate evaluation of subjects as well as grades assessed at the school level. Reading and mathematics are evaluated independently to determine areas of strength and weakness within each grade level as well as at the school level. The ADE has determined the starting point, annual measurable objectives, intermediate goals and growth expectations for each subject and grade.

[10] If the State has more than one assessment to cover its language arts standards, the State must create a method for including scores from all the relevant assessments.

PRINCIPLE 9. State Accountability System is statistically valid and reliable.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
9.1 How do AYP determinations meet the State's standard for acceptable reliability?	State has defined a method for determining an acceptable level of reliability (decision consistency) for AYP decisions. State provides evidence that decision consistency is (1) within the range deemed acceptable to the State, and (2) meets professional standards and practice. State publicly reports the estimate of decision consistency, and incorporates it appropriately into accountability decisions. State updates analysis and reporting of decision consistency at appropriate intervals.	State does not have an acceptable method for determining reliability (decision consistency) of accountability decisions, e.g., it reports only reliability coefficients for its assessments. State has parameters for acceptable reliability; however, the actual reliability (decision consistency) falls outside those parameters. State's evidence regarding accountability reliability (decision consistency) is not updated.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

During the spring and summer of 2003, the ADE will meet with district and educational representatives to modify the existing state accountability system in order to integrate the requirements established by NCLB. This group deals with the fundamental questions regarding school accountability and seeks to develop a fair, accurate, valid and reliable system to measure student achievement and school performance. The ADE will make AYP determinations for all student subgroups; schools, district and the state based on a 99% confidence level that the decisions made regarding the performance of schools are accurate. The ADE will determine the confidence interval for the percent proficient for each subject and grade to determine that the probability of a particular subgroup, school or district making the annual measurable objective (AMO) falls within a 99% confidence level, ($p = .01$). The ADE will utilize statistical methods, confidence intervals, to ensure that AYP decisions meet the state's standards for acceptable reliability. AYP decisions will be made separately by subject (reading and mathematics).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
9.2 What is the State's process for making valid AYP determinations?	State has established a process for public schools and LEAs to appeal an accountability decision.	State does not have a system for handling appeals of accountability decisions.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

In accordance with Title I, Section 1116 (2) (A-C) of the No Child Left Behind Act, the Arizona Department of Education (ADE) will provide schools proposed for failure to make adequate yearly progress (AYP), which may result in an identification for school improvement, corrective action, or restructuring, the opportunity to review the school-level data (including assessment data) on which the proposed identification is based. If the principal of a school proposed for failure to make AYP believes, or a majority of the parents of the students enrolled in such school believe that the proposed identification is in error for *statistical or other substantive reasons*, the principal may provide supporting evidence to the ADE for further consideration prior to the final AYP determination. This procedure established by Title I, Section 1116 (2) (A-C) of the No Child Left Behind Act will serve as the basis for AYP appeals. The AYP appeal procedure established by the ADE effectively completes the process for making valid AYP determinations. A final AYP determination and public release will occur no longer than thirty (30) days after the release of preliminary AYP determinations.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
9.3 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?	State has a plan to maintain continuity in AYP decisions necessary for validity through planned assessment changes, and other changes necessary to comply fully with NCLB.[11] State has a plan for including new public schools in the State Accountability System. State has a plan for periodically reviewing its State Accountability System, so that unforeseen changes can be quickly addressed.	State's transition plan interrupts annual determination of AYP. State does not have a plan for handling changes: e.g., to its assessment system, or the addition of new public schools.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The most immediate challenge is the incorporation of additional grades assessed within the accountability system as required by the No Child Left Behind Act of 2001. As noted earlier in Section 8.1 a school classification is based on the combination of the grades and subjects assessed (this is based primarily on grade configurations). Therefore, the inclusion of additional grades into State assessment simply requires the ADE to determine starting points and growth point groupings for these new grades, as well as reevaluate previous data in grades 3, 5 and 8. The ADE will determine the appropriate Subject/Grade Value Scales based on these new grade levels and provide a recommendation to the State Board of Education at such a time that this is appropriate. The Arizona Department of Education (ADE) will evaluate the current performance/achievement standards in order to determine if said standards are set at appropriate levels when AIMS is articulated grades 3 through 8 in 2004-2005.

[11] Several events may occur which necessitate such a plan. For example, (1) the State may need to include additional assessments in grades 3-8 by 2005-2006; (2) the State may revise content and/or academic achievement standards; (3) the State may need to recalculate the starting point with the addition of new assessments; or (4) the State may need to incorporate the graduation rate or other indicators into its State Accountability System. These events may require new calculations of validity and reliability.

PRINCIPLE 10. In order for a public school or LEA to make AYP, the State ensures that it assessed at least 95% of the students enrolled in each subgroup.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
10.1 What is the State's method for calculating participation rates in the State assessments for use in AYP determinations?	State has a procedure to determine the number of absent or untested students (by subgroup and aggregate). State has a procedure to determine the denominator (total enrollment) for the 95% calculation (by subgroup and aggregate). Public schools and LEAs are held accountable for reaching the 95% assessed goal.	The state does not have a procedure for determining the rate of students participating in statewide assessments. Public schools and LEAs are not held accountable for testing at least 95% of their students.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

Participation Requirements: Schools and districts in which at least ninety-five percent (95%) of students enrolled at the time of the test administration complete the state assessments will meet the AYP standard established in federal statute. Schools and districts in which fewer than ninety-five percent (95%) of any student subgroup completes the state-mandated assessments will not meet the AYP standard, provided that the size of the subgroup meets the minimum number of students required for the analysis, thirty (30) students.

The ADE intends to use the following formula to determine the percentage of students assessed for each grade level and subject in elementary and middle schools:

$$\textbf{\% Assessed} = \frac{\text{Number of 3, 5, 8}^{th}\text{ graders assessed}}{\text{Number of 3, 5, 8}^{th}\text{ graders enrolled}} \times 100$$

Students are first given the opportunity to take the Arizona's Instrument to Measure Standards (AIMS) at the high school level in grade ten (10). High school AIMS assessments are administered in early spring and are only given on one specified date. Therefore students who are absent on test day are not given an opportunity to make-up the test. At this time, make-up assessments (for students who are not assessed on the one day assigned per subject) **are not permitted** for high school students for AIMS reading and mathematics. In order to address this issue, the ADE intends to develop additional forms of the high school AIMS assessments required to administer makeup exams and/or propose an extension to the testing window to the State Board of Education (please see the following timeline).

May/June 2003 — The ADE will convene a committee to investigate possible options and associated financial impacts relating to assessment requirements needed to fulfill NCLB mandates. Members of this committee will include ADE staff, school and district personnel, and representatives from the testing contractor.

July 2003 — The ADE will present these options and financial impact to the State Board of Education for discussion/review.

August 2003 The ADE will present these options to the State Board of Education for final adoption.

The percentage of students in secondary schools will be assessed based on the number of tenth (10) grade students assessed annually:

$$\textbf{\% Assessed} = \frac{\text{Number of } 10^{th} \text{ graders assessed}}{10^{th} \text{ grade enrollment}} \times 100$$

The ADE will utilize school finance and MIS data that has undergone extensive integrity and validity checks to calculate the percent of students assessed. School and district funding is determined based on the data that is provided to the ADE through the Student Details System. These data will be utilized to the extent possible starting in the 2002-2003 academic year for calculating the 2003 Achievement Profile. Detailed descriptions of the integrity and validity checks utilized by the ADE can be provided if necessary. Furthermore, under A.R.S. §15-241 schools must provide accurate data necessary for the calculation of the Achievement Profiles, including AYP data, or risk the loss of classroom site funds if found not to be compliant. The ADE has authority to audit and monitor school data for compliance.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF *NOT* MEETING REQUIREMENTS
10.2 What is the State's policy for determining when the 95% assessed requirement should be applied?	State has a policy that implements the regulation regarding the use of 95% allowance when the group is statistically significant according to State rules.	State does not have a procedure for making this determination.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

The Arizona Department of Education (ADE) recommended to the State Board of Education in March 2003 that the minimum number of students for each subgroup be consistent across the analysis. The Arizona State Board of Education approved the minimum number of students required for accountability purposes and the determination of the percentage of students assessed is thirty (30) students.

Appendix A
Required Data Elements for State Report Card

1111(h)(1)(C)

1. Information, in the aggregate, on student achievement at each proficiency level on the State academic assessments (disaggregated by race, ethnicity, gender, disability status, migrant status, English proficiency, and status as economically disadvantaged, except that such disaggregation shall not be required in a case in which the number of students in a category is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about an individual student.

2. Information that provides a comparison between the actual achievement levels of each student subgroup and the State's annual measurable objectives for each such group of students on each of the academic assessments.

3. The percentage of students not tested (disaggregated by the student subgroups), except that such disaggregation shall not be required in a case in which the number of students in a category is insufficient to yield statistically reliable information or the results would reveal personally identifiable information about an individual student.

4. The most recent 2-year trend in student achievement in each subject area, and for each grade level, for the required assessments.

5. Aggregate information on any other indicators used by the State to determine the adequate yearly progress of students in achieving State academic achievement standards disaggregated by student subgroups.

6. Graduation rates for secondary school students disaggregated by student subgroups.

7. Information on the performance of local educational agencies in the State regarding making adequate yearly progress, including the number and names of each school identified for school improvement under section 1116.

8. The professional qualifications of teachers in the State, the percentage of such teachers teaching with emergency or provisional credentials, and the percentage of classes in the State not taught by highly qualified teachers, in the aggregate and disaggregated by high-poverty compared to low-poverty schools which (for this purpose) means schools in the top quartile of poverty and the bottom quartile of poverty in the State.