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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Roy and Josie Fisher, et al.,

Plaintiffs

CV 74-90 TUC DCB
(Lead Case)

v.

United States of America,

Plaintiff-Intervenor,

**DECLARATION OF MARTHA
TAYLOR IN SUPPORT OF
OBJECTION TO REPORT AND
RECOMMENDATIONS
REGARDING THE REVISION
OF TUSD'S COMPREHENSIVE
MAGNET PLAN**

v.

Anita Lohr, et al.,

Defendants,

CV 74-204 TUC DCB
(Consolidated Case)

and

Sidney L. Sutton, et al.,

Defendants-Intervenors,

1	Maria Mendoza, et al.
2	Plaintiffs,
3	United States of America,
4	Plaintiff-Intervenor,
5	v.
6	Tucson Unified School District No. One, et al.
7	Defendants.

8
9 I, Martha Taylor, declare under penalty of perjury that the following statements are
10 true:

11 1. I am the Senior Desegregation Director for Defendant Tucson Unified School
12 District No. One ("TUSD") and have held this position since January 2015. I have personal
13 knowledge of the facts stated herein.

14 2. Attached hereto as **Exhibit A** is a clean copy of the June 26 Revised
15 Comprehensive Magnet Plan (the redlined version of which was filed on June 26 and
16 docketed as ECF 1819-1 at 26).

17 3. Attached hereto as **Exhibit B** is a true and correct copy of the Revised
18 Dropout Prevention and Graduation Plan (Dropout and Retention Plan) dated January 30,
19 2015 and re-revised March 13, 2015. This plan addresses ELL strategies and was approved
20 by the Special Master and the Plaintiffs.

21
22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct.

24
25 DATED this 20th day of July, 2015

26
27 
Martha Taylor

Tucson Unified School District – Legal Department
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EXHIBIT A

TUSD

Tucson Unified School District

**Revised Comprehensive
Magnet Plan
6.26.15**

2015-16

2016-17

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Attachments

Attachment	Title
A	2011 Magnet School Study
B	Job Description: Magnet Coordinator
C	Job Description: Teacher Assistant
D	Job Description: Instructional Data and Intervention Coach
E	Professional Learning Community Protocols (DRAFT)
F	Site Magnet Plans

Overview

Magnet schools were established in Tucson Unified School District (TUSD) in 1978 in response to a federal district court settlement agreement. The intention of magnet schools at that point was to eliminate the vestiges of the previously segregated dual school system. In the ensuing years, the purpose of TUSD magnet programs changed. TUSD is currently under a desegregation plan, with magnet programs identified as a primary strategy for integrating schools within the District. The goal of magnet schools by definition is to attract a racially diverse student body by creating schools so unique and appealing that it will draw a diverse range of students from across the district. In successful magnet schools, the student and staff population is diverse and academic achievement is higher than non-magnet schools.

In TUSD, there are currently 20 magnet school sites. As the District moves toward unitary status, TUSD's Magnet Department is committed to magnet schools becoming integrated and high achieving. To do so, specific goals have been created that will address the issues surrounding integration and student achievement.

Court order 1753 requires that TUSD magnet schools are integrated and academically successful by the end of the 2016-2017 school year. The first goal reflects the USP definition of an integrated school [USP II.B.2]. In addition, there are five student achievement goals: 1. A magnet school must be an A or B school as defined by the Arizona Department of Education school letter grade system. 2. Students in magnet schools will score higher than the state median in reading and math on the state assessment. 3. Students in magnet schools show higher growth than the state median growth in math and reading. 4. Magnet schools will secure the growth of the bottom 25% of the students at the school at a rate higher than the state median growth of the bottom 25%. 5. Magnet schools will reduce achievement gaps between the racial groups so that achievement gaps between racial groups are less than those in schools not participating in magnet programs.

History of the Comprehensive Magnet Plan

A Comprehensive Magnet Plan was approved by the Governing Board on July 15, 2014. This plan was rejected by the courts. A court order was filed in January 2015 which requires a revision of the Comprehensive Magnet Plan be submitted to the Special Master by May 15, 2015. Order 1753 requires that the District work with the Special Master to create school plans. The Special Master provided specific guidance and support during the development of the school plans.

Magnet Plan of Action

The purpose of this section, *Magnet Plan of Action*, is to address the requirements of the Unitary Status Plan.

Magnet Strategy and Operations [USP (II)(C)(2); (II)(E)(3)]

The Tucson Unified School District Magnet Department has adopted a continuous school improvement model inspired by Michael Fullan (*Leadership and Sustainability: System Thinkers in Action*, 2005), Paul Bambrick-Santoyo (*Leverage Leadership*), and Mark A. Smylie (*Continuous School Improvement*, 2010). Using the organizational design principles outlined by Bambrick-

Santoyo, each school created a continuous school improvement plan. Every magnet school plan describes strategies that focus on improving integration and student achievement.

During the 2015-16 and 2016-17 school years, the Magnet Department will provide oversight of each site's Magnet School Plan. The Magnet Director and a Senior Program Coordinator will work with campuses to assure implementation and compliance of each plan and provide support as needed. The Magnet Department will take an active role in improving instructional quality and academic rigor so schools can attain the student achievement goals defined in Court Order 1753. Collaboration with the Curriculum and Instruction Department, Human Resources, Student Equity and Title I will ensure that all available resources are leveraged. The Magnet Department will also work closely with the Communications Department to implement marketing and recruitment campaigns. These campaigns will support schools in meeting integration benchmarks defined in each Magnet School Plan. The Magnet Department will continue to partner with family centers, support events, provide outreach, and market school brands.

Student Assignment Overview [USP (II)(A)(1); USP (II)(A)(2); USP (II)(E)(3)]

Tucson Unified School District's School Community Services Department manages the lottery system that determines student placement for magnet or open enrollment. This lottery is weighted to support integration of schools according to USP ethnicity requirements. Magnet applications are accepted at school sites, on-line, at family centers, and at School Community Services. The Magnet Department and School Community Services collaborate each year to ensure that information about magnet programs and pipelines are accurate before applications are released to the public. The application window for lottery selection for magnet programs runs from November through March. Parents may continue to submit applications after the March lottery window deadline. Students will be placed if the magnet campus has available seats.

Other than the weighted lottery, there are no other admission priorities for magnet schools. However, at Tully there will be two GATE components: self-contained – as an addition to the District's self-contained GATE option - and GATE Plus. Students in the self-contained strand will take the GATE placement test; all other students will receive GATE Plus services in their regular classrooms. The self-contained strand thus has a testing component, which is unique among TUSD magnet schools.

Magnet Programs – Magnet School Plan [USP (II)(E)(3); Order 1753 Filed 01/16/15]

Current budget capacity does not exist to adequately resource and staff new and replicated programs. As a result, during the 2015-16 and 2016-17 school years, the District will not be adding new magnet sites and no programs will be replicated or relocated. No additional dual language magnet programs will be offered during the 2015-16 or 2016-17 school years. However, the District may consider adding programs in the future. Pipelined magnet programs offer a continuous theme from Kindergarten to High School. The District currently has an International Baccalaureate, Fine and Performing Arts, and Science Technology and Math pipelines (STEM). As some pipelines might be disrupted by program elimination, the District will work to identify new magnet sites to continue these pipelines. After the 2016-17 school year, new, replicated and/or relocated magnet

programs will be considered based on budget capacity, available resources, public interest, and location.

During the 2013-14 school year, the District initiated a comprehensive boundary review. The Boundary Committee determined that any change in boundaries would not have a significant effect on the integration of magnet schools. Therefore, no changes will be made in attendance boundaries for magnet schools during the 2015-16 school year. Dodge Magnet Middle School will remain the only magnet program with no attendance boundary.

The District assigned new magnet themes to two campuses. Tully Magnet Elementary will change their theme from STEM to Gifted and Talented (to be implemented during the 2016-17 school year) and Carrillo Magnet Elementary adopted Communication and Creative Arts as a theme effective 2014-15 school year. [USP (II)(E)(3)]

In accordance with Court Order 1753, each site created a Magnet School Plan (MSP) that addresses two specific components: integration and student achievement. Each magnet school created a two year plan that includes both long term goals and annual benchmarks. Each school adopted a continuous improvement model that is driven by systematic, steady and incremental progress.

Schools underwent a needs assessment to determine goals and benchmarks for integration and student achievement. Schools analyzed two years of data. From these data points, schools created goals and benchmarks. Some schools anticipated that the majority of growth was going to occur the second year of implementation. The goals and benchmarks were modified to show equal incremental growth over the two year span of the plan. Each Magnet School Plan includes intentional strategies that will allow for progress toward integration and student achievement. By using specialized instructional strategies for diverse populations and strengthening their unique theme, schools will meet the challenges set before them. These strategies are integral to the schools' missions and their identity as magnets.

In March and April of 2015, principals and key magnet staff were trained on the processes and components of continuous school improvement. Participants were briefed on the difference between the change process as an adaptation to internal and external demands compared to the idea of change that occurs over time and never reaches a final outcome. School teams analyzed current conditions and processes to determine what adjustments needed to be made in order to implement continuous improvement. These components were embedded into the Magnet School Plans.

Processes and Schedules to Improve Magnet Programs

A committee comprised of District representatives, a plaintiff representative, and the Special Master analyzed enrollment and student achievement data for all twenty magnet schools. Two data points were used to group schools: the state letter grade and the application of the integration formula. Schools were grouped according to state letter grade and integration trends. Table 1 indicates how schools were grouped.

Table 1

School	Letter Grade	Integration Status	School	Letter Grade	Integration Status	School	Letter Grade	Integration Status
Carrillo	A	No	Bonillas	C	No	Cragin**	C	Yes
Dodge	A	Yes	Booth-Fickett	C	Yes	Pueblo	C	No
Drachman	A	No	Borton	C	Yes	Holladay	D	No
Palo Verde	A	Yes	Mansfeld	C	No	Robison	D	No
Cholla	B	Yes	Safford	C	No	Utterback	D	No
Davis	B	No						
Ochoa	B	No						
Roskruge	B	No						
Tucson	B	No						
Tully*	C	No						

*= Tully is exempt from elimination because of theme change in 2015-16

**= Magnet status eliminated 2015-2016 school year

To address integration, the District worked with magnet schools to review successful strategies and brainstorm strategies that have not been explored. Schools added these strategies to the Integration section of their magnet school plans. “A” and “B” schools that are integrated or close to integration will divide the Magnet Coordinator’s time between supporting recruitment and improving student achievement. “C” and “D” schools will utilize the coordinator position to primarily improve student achievement.

All schools must show progress toward integration each year, with 2014-15 being the baseline year. Integration can be measured in two ways. First, Special Master will examine the overall integration of the school using the 70% and 15% thresholds. Second, progress toward integration will be measured by the incoming class at lowest grade and those students in subsequent years. Integration must be maintained at each of the subsequent grade levels starting with 2014-15 and 2015-16, and from 2015-16 to 2016-17. After the 40th day of enrollment for 2015-16, and the 40th day of 2016-17, the Special Master may recommend to the courts that these schools that have little chance to integrate and magnet status should be relinquished. Schools that have shown substantial progress toward integration will have until June of 2017 to meet USP integration standards.

To address student achievement, the District required each school to adopt a continuous school improvement (CSI) process centered on student data. CSI enhances the ability of teachers to employ a repertoire of instructional strategies rooted in culturally responsive pedagogy to create school cultures that are inclusive and supported by shared leadership and instructional support systems. “A” and “B” schools were directed to include the following three strategies for improving overall student achievement and closing the achievement gap in their school plan. Schools that have a magnet identity were encouraged to keep that identity and embed the theme into the strategies:

- Implement PLCs a two hour block of time at least once weekly
 - The district will provide training on the implementation of the DuFour Model of Professional Learning Communities (PLCs) and the in-depth data analysis strategies outlined by Paul Bambrick-Santoyo.

- The District has created a protocol for all PLCs (See Attachment E). The protocol begins by teachers coming to a common agreement on four basic questions: 1) What do we want students to learn? 2) How will we know if they learn it? 3) How do we respond when students are not learning? 4) How do we respond when students have already learned it? Next, the professional community will purposefully analyze student work to determine who has learned the skill(s), are there specific trends to consider, and to determine who did not learn the skill. The professional community can begin to dialog and problem solve collaboratively. This protocol includes a Team Agenda and a Team Feedback Sheet so that communication is apparent between team members, teacher leaders, and the leadership team.
- Tucson Unified School District recognizes the importance of professional development of all staff and believes that to build instructional capacity, teachers and staff who provide instructional services for students must be continuous learners. To this end, the District has set aside one day week where students leave early, freeing up quality time for staff to participate in PLCs, Learner Centered Professional Development, and other training as necessary. Teachers in magnet schools will participate in PLCs during release time on Wednesdays and will be compensated for an additional hour to ensure that they have a minimum of 90 minutes at least once a week. Some schools have leveraged staff so that additional time is built into the schedule without impacting or reducing the amount of instructional time. Mansfeld is a good example. Because of the seven period day, Mansfeld is able to give teachers additional planning time without impacting the school day for students. Borton, Holladay, and Carrillo utilize certified specialists to provide art, outdoor learning, and drama. While students are in these classes, teachers are able to plan, meet and collaborate.
- Provide Learner Centered Professional Development (LCPD) incorporates what we know about adult professional learning and couples that with research from school reform efforts. LCPD approaches professional learning as an interactive process where teachers are viewed as competent and motivated learners. LCPD focuses on the improvement of instructional practices and instructional strategies that are directly related to the daily challenges of the classroom. There is the direct connection between the actions that a teacher needs to take for students to be successful and measuring how those actions directly impact the challenges of the classroom. LCPD can be more effective than the traditional methods of professional development because the learning is job-embedded and directly related to classroom experiences. When teachers develop analytic capacity and are responsible for identifying what they need to learn, they are more motivated and committed to the learning. The content of LCPD focuses on what students are to learn and how to address the different problems students may have in learning the material.
- LCPD is driven by analyses of the difference between the goals and standards for student learning and student performance.
- LCPD is primarily school-based and integral to school processes and schedules.
- LCPD is organized around collaborative learning and problem solving.

- A Magnet Coordinator (see attachment B) will provide support for classroom teachers to improve instruction, aggregate data, and guide PLCs as needed. Magnet Coordinators will be trained in facilitating data dialogs (*Leveraging Leadership*).

“C” and “D” schools were directed to include the three strategies above. As well, these schools were directed to choose from a menu of other strategies:

- Create Teacher Leaders of PLCs.. Reduce class size or student to adult ratio.
- Provide training on differentiated Tier 1 instruction for all students. The training must be followed up by classroom observations and coaching.
- Utilize Cooperative Learning strategies
- Utilize peer tutoring
- Provide Tier 2 intervention within the school day.
- Provide Tier 3 interventions.
- Use a Peer Observation Model to provide lesson and instructional feedback.
- Utilize an Instructional Data and Intervention Coach or Learning Support Coordinator (LSC) to support PLCs.

Schools were given the opportunity to include research-based strategies that address student achievement or closing achievement gaps in addition to the strategies listed above and that were approved by the District and were in line with the CSI initiative. To meet the student achievement goals, all magnet schools wrote specific strategies to improve academic achievement for all students, address achievement discrepancies in the lower 25%, and address achievement gaps. For those schools that did not reclassify enough ELL students to receive additional points from the Arizona Department of Education letter grade system, they included strategies in their plans specifically designed for the success of ELL students. Benchmarks for 2015-16 and budgetary requirements are also outlined in each Magnet School Plan.

Magnet schools that have a state letter grade of “D” have been granted magnet funding for the 2015-16 school year. This funding is to be allocated towards student achievement, with care taken to not supplant Title 1 programs. After analysis of 2015-16 40th day enrollment data, the Special Master may consider withdrawing magnet status. In the case of Cragin, the District agreed with the plaintiffs that budgetary capacity does not currently exist to support this site’s magnet program. Therefore, after 2015-16 Cragin will no longer receive magnet funding and will not be considered a magnet school. Cragin will not be included in the magnet lottery process for 2015-16. However, because of location, the District may consider Cragin as a magnet in the future. Tully will be exempt from this measure because of the theme change.

Strategies to Improve Student Achievement

There are two key factors to improving student achievement: Instruction and School Culture. Data driven instruction, observational feedback, instructional planning, and professional development when done with purposeful intention will improve student achievement. School Culture is defined by student expectations, staff culture, and distributed leadership.

The District will provide professional development opportunities that are consistent with current research to ensure that teachers build a broad range teaching strategies for students who are struggling academically. Related training will be provided to principals, teacher evaluators

and instructional support staff. The District will offer training opportunities to help principals and teachers use data driven instruction, observational feedback and instructional planning. Principals will receive training in creating a positive school culture that reflects high expectations for both students and teachers and in developing distributed leadership systems, with teachers as Teacher Leaders.

All magnet schools have to implement three strategies: Create robust PLCs around what students need to learn, implement Learner Centered Professional Development, and utilize an instructional expert to support teacher learning. Magnet schools that are “C” and “D” have to include other strategies in their plan.

Those that intend to reduce the student to adult ratio will utilize Teacher Assistants (see attachment C). To be a Teacher Assistant in TUSD, you must have the following qualifications:

- Associates Degree (or higher), OR 60 Semester Hour credits, OR AZ Department of Education approve Academic Assessment Test
- At least one year experience working with youth
- Speak, read, and write English

Based on student data, teachers will identify students who either have learned the skill, who are on their way to learning the skill, or who are struggling. Teachers will then provide either small group instruction or one-on-one instruction to address the students who have not learned the skill. Balancing a full classroom and providing small group and individualized learning can be a challenge for the best of teachers. Teacher Assistants in the classroom can provide the support needed so that all students can succeed by providing guidance and direction while the teacher works with small groups or one-on-one. When Teacher Assistants are used, they will be supporting the learning of students who are not struggling so that certified personnel can work more intensively with students who most need their expertise.

Other schools have chosen to implement Multi-Tiered System of Support.. This model uses student data to determine grouping for specific purposes that relate to student needs and strengths. When teachers focus on students’ cultural linguistic and cognitive assets, they can design learning situations that enable students to connect what they know to what we want them to learn. The model of grouping is fluid and flexible where not only the students move in and out of support systems, but what they are learning changes also. The majority of student learning time is in whole group, flexible groups, or individualized. Pull-out interventions will be used minimally. Teachers will use a range of instructional strategies that minimize the use of achievement groups such as cooperative learning, peer tutoring, and differentiated instruction. Some schools have elected to use an Instructional Data and Intervention Coach to support these efforts.

Interventions provided outside the school day will be considered at each magnet school. The Magnet Department has been instrumental in writing grants for schools. Currently, thirteen of the twenty magnet schools have 21st century funding. The Department submitted five more grants that could be funded for 2015-16. This is a five year grant by the Arizona Department of Education that provides extended day opportunities for students and includes transportation. Some schools are using a community school approach that includes a minimal fee. Other schools are providing after school tutoring and Saturday school where teachers are working

directly with students on specific content skills. After school tutoring and Saturday school may include transportation.

Some schools recognize the need to improve instructional practices. Those schools will utilize specialists to support teacher learning. Magnet Coordinators will work directly with teachers in planning and lesson delivery. Instructional Data and Intervention Coordinator (see attachment E) will support PLCs and individual teachers in creating meaningful assessments, providing data reports, and support teachers in understanding the data. This position will track student data and offer recommendations for interventions. Teacher Leaders, although not a dedicated position, will work with PLCs to facilitate deep and deliberate dialog that connects assessment to student learning to instruction. This will allow teachers to reflect and make adjustments to both planning and instruction.

Teaching used to be seen as a deeply personal craft and often teachers were reluctant to have others observe their practice. In today's schools, this is not the case. More and more, teachers are becoming open minded and are welcoming other practitioners to provide feedback and help one another reflect on their instruction. Some Magnet schools have chosen peer observation as a tool to improve instruction. In peer observation, teachers meet together to discuss the lesson that is going to be taught. The teacher who is going to be observed explains any nuances of the lesson or particular areas that he/she would like to have special attention paid. The observing teacher watches the entire lesson as planned and makes observational notes. After, the two teachers come together to reflect on the lesson, study the data, and work collaboratively to improve instruction. This strategy takes a great deal of training before being implemented.

Processes and Strategies to Eliminate Magnet Programs

According to Court Order 1753, each magnet school will be evaluated annually using data markers for integration and student achievement. This will allow the Special Master and the District to determine the viability and desirability of existing programs. According to the Draft of Response to January 16 Court Order, "Should it appear highly unlikely that any particular magnet school or program will be able to meet the six goals (sic) by the end of the 2016-17 school year, the Special Master may recommend that magnet status be withdrawn." In the Fall of 2015, the Special Master will review 40th day enrollment data to determine whether magnet schools have met the USP integration goal or the goal for incoming grades, beginning with those grades that began in 2014-15. This analysis will be the first determining factor in identifying which magnet programs will be recommended for elimination. If the Special Master recommends that the magnet be eliminated, and if the Court adopts the recommendation, the funding allocated to the school for recruitment and marketing will be reallocated. Students attending under magnet status would continue to receive transportation until they reach the highest grade in that school. Once students reach the highest grade, they will returned to their neighborhood school or families may choose to open enroll.

Student achievement data will be the second determining factor in identifying possible magnet elimination. Assessment data from the 2016-17 school year will be analyzed according to five goals. Magnet schools must:

1. Be an A or B school as defined by the state school letter grade system.
2. Score higher than the state median in reading and math on the state assessment.

3. Show academic growth of all students higher than the state median growth in reading and math.
4. Secure the growth of the bottom 25% of the students of the school at a rate higher than the state median growth.
5. Reduce achievement gaps between ethnic groups so that achievement gaps between these groups are less than those in schools with similar demographics and socio economic factors and that are not magnet schools in the district. The gap shall be defined as the difference between performance in math and reading/literacy of the highest ethnic group compared to other ethnic groups within the school.

The budgeting process for most schools begins in the spring and is finalized by the end of June. Teachers and administrators are notified of the positions at the schools based on these preliminary budgets. Student test scores are usually made public late June or early July. If a magnet is eliminated because of lack of progress in improving student achievement, magnet funding will not be continued beyond the year in which funding is withdrawn. However, schools that lose magnet status will be funded as needed to meet student needs. In this case, schools will be allowed to exceed formula funding. Students attending the school under magnet status will receive transportation until they reach the highest grade at that school. The District will create a plan to support schools in building both budgetary and programmatic capacity so that the schools that lose magnet status are able to maintain basic school functions. These plans will vary from site to site, as some schools are more heavily invested in instructional staff and support positions.

Schedule for Magnet Programs

Date	Action	Participants
March-April, 2015	Schools develop Magnet School Plans	Site leadership
	Plans reviewed by stakeholders	Site leadership, district leadership, Special Master, plaintiffs
	New theme chosen for Tully	Theme determined by District leadership
May, 2015	Comprehensive Magnet Plan submitted	Magnet Department, Special Master
June, 2015	Comprehensive Magnet Plan to Governing Board Comprehensive Magnet Plan submitted	Magnet Department Court
June, 2015	26-TUSD files its responses to Plaintiffs objections 30-Plaintiffs may file comments on individual plans	TUSD, Plaintiffs, Special Master
June-July, 2015	CMP Approved by Court Professional development focusing on achievement	Magnet school staff, District professional development staff
July-May	7-TUSD may file response to Plaintiffs' comments about individual school plans 9- Special Master files his recommendations with the Court	Plaintiffs, Special Master, Magnet Department, School Staff, Communications Department

	The Parties may each file a response to the Special Master's recommendations Marketing and Recruitment begins Training for Magnet Coordinators Training for Principals	
October, 2015	40 th day enrollment data compared to 2014-15 baseline	Magnet Department, Research and Accountability, School Community Services, Special Master
November, 2015	Court report on enrollment data findings regarding integration goals with recommendations concerning magnet status	Special Master
January, 2016	Achievement data submission	Magnet Department, Special Master
February 2016	Report of achievement to courts with recommendations concerning magnet status	Special Master

The Magnet Department will work in collaboration with other District departments to provide high quality professional development opportunities for teachers and administrators in order to on build knowledge and skills necessary to meet the five achievement goals set forth in the Order.

Federal Magnet School Funding USP (II)(E)(5)

The Magnet Department will apply for the Magnet Schools Assistance Program grant in 2016-17.

Transportation – General Provisions [USP (III)(A)(3)]

The District will continue to provide free transportation to all magnet students who meet the guidelines established in the District's Transportation Policy EEA and in the USP VIII.A.5. If a magnet is eliminated, students attending as a magnet student will continue to receive transportation until they reach the highest grade at that school. Students participating in 21st Century programs will also be eligible for transportation. Schools that provide after school community programs, tutoring, and Saturday school will work with the Transportation Department to ensure equitable access to transportation so all students have the opportunity to participate.