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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,

**TUCSON UNIFIED SCHOOL
DISTRICT'S OBJECTION TO
SPECIAL MASTER'S REPORT
AND RECOMMENDATIONS
RELATING TO PRINCIPAL AND
TEACHER EVALUATIONS (ECF
1845)**

v.

Anita Lohr, et al.,

Defendants,

Oral Argument Requested

and

Sidney L. Sutton, et al.,

Defendants-Intervenors,

CV 74-204 TUC DCB
(Consolidated Case)

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.

9 **I. Introduction**

10 Defendant Tucson Unified School District objects to the Special Master’s Report and
 11 Recommendation (“R&R”) relating to Principal and Teacher Evaluations (“TPE”) (ECF
 12 1845). This Objection is supported by the declaration of Alyson Lavigne, PhD (“Decl.
 13 Lavigne”) attached as **Exhibit 1**, an expert in instructional leadership and evaluation, as
 14 well as the declaration of Dan Erickson (“Decl. Erickson”) attached as **Exhibit 2**, President
 15 of Education Leaders, Inc. (ELI), which is the collective voice of school principals
 16 employed by the District.

17 This is the latest in a long line of examples¹ where the Plaintiffs invite the Court to
 18 overstep the limits of judicial intervention by requesting the Special Master and Court to
 19 interfere with minute programmatic decisions within the District’s discretion. The R&R,
 20 based upon issues raised solely by the Mendoza Plaintiffs,² makes two recommendations:
 21 (1) TUSD should conduct an assessment of the validity of the teacher evaluation
 22 instrument, and (2) TUSD should increase the combined weight of teacher/student opinion
 23 surveys in principal evaluations from 10% to 17%.

25 ¹ For list of examples, see TUSD’s Motion for Evidentiary Hearing/Status
 26 Conference (ECF 1846). The parties await Court orders on the pending R&Rs on Advanced
 27 Learning Experiences (ECF 1645), the Comprehensive Magnet Plan (ECF 1721), and the
 Budget (ECF 1670).

28 ² The Fisher Plaintiffs and Department of Justice do not share in the Mendozas’
 objections.

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1 Regarding the first issue, TUSD agrees to review the efficacy of the weight assigned
 2 to student surveys as they inform teacher evaluation and does not address that issue further.
 3 The second recommendation is another prime example of why minute programmatic
 4 decisions must remain in the hands of the District. The parties are before this Court,
 5 incurring thousands of taxpayer dollars for the Special Master, TUSD and Plaintiffs to
 6 litigate a 7% weight allocation in principal evaluation instruments, when this decision
 7 should be left with TUSD.

8 USP § IV.H.1. requires the District to “adopt [a] principal evaluation instrument[] to
 9 ensure that such evaluations, in addition to requirements of State law and other measures
 10 the District deems appropriate, give adequate weight to” a variety of factors, including
 11 “aggregated responses from student and teacher surveys to be developed by the District. . .
 12 .” The District has adopted an evaluation instrument that evaluates principals using a
 13 combined weight of 10% for student and teacher surveys – 4% for student surveys and 6%
 14 for teacher surveys – which it has determined to be adequate³ as the USP requires.

15 The weight allocations were determined by TUSD in accordance with the USP, in
 16 light of applicable State laws and in the context of the entire scope of District operations
 17 (including negotiations with ELI, the administrator employee bargaining group). The
 18 District-selected weight allocations reflect that principal evaluations should be weighted
 19 heavily on objective measures of site leadership and professional standards, and that
 20 subjective opinion surveys should not be weighted any more than 10%. The R&R, on the
 21 other hand, demands the weight of opinion surveys be increased by 7% without any basis,
 22
 23

24 ³ The Special Master does not specify his definition of “adequate.” He appears to be
 25 defining “adequate” primarily on numeric qualities (such as weight), which ignores the
 26 quality of a measure. A poor measure can be assigned a substantial weight, but this will
 27 have little meaning for principals if it is not reliable, valid, or does not help principals
 28 improve their practices. *See* Decl. Lavigne ¶ 7. The Special Master and the parties
 specifically chose the word “adequate” for this provision. Merriam-Webster defines it as
 “good enough.” The USP does *not* require TUSD to give the “most” weight, the
 “maximum” weight, or a “significant” weight.

1 research or evidence suggesting the District-selected 10% weight is inadequate.
2 Accordingly, the R&R on this issue must be denied.

3
4 **II. The Special Master’s “Context” Section is Inaccurate, Lacks Foundation, and Should Be Stricken From the Record**

5 Although the relevance to the R&R is not clear, the Special Master stated in the
6 R&R’s “context” section that “the District refused to submit teacher and principal
7 evaluation plans for review, and a court order in January 2015 was needed to require the
8 District to develop such plans (Doc. 1760).” *See* ECF 1845 at 3. This grossly
9 mischaracterizes both the District’s posture and what actually occurred. As previously
10 briefed in ECF 1668, the District did not believe the USP mandated submission of the
11 teacher and principal evaluation instruments to Plaintiffs for review, and accordingly did
12 not do so. When the Court ordered TUSD to do so anyway upon the recommendation of the
13 Special Master, TUSD complied with the Court’s order. That legal dispute was resolved
14 almost a year ago and need not be revisited here.

15 Next in the “context” section, the Special Master prepared a list of instances where
16 TUSD asserted legal positions where it believed the Special Master and Plaintiffs demanded
17 action and tax dollars both beyond and outside the scope of the USP. This is an ongoing
18 problem TUSD has requested the Court to address in the motion it has filed requesting a
19 hearing/status conference. *See* ECF 1846. Inclusion of TUSD’s prior litigation positions in
20 this R&R appear to be punitive in nature and specifically intended to deter TUSD from
21 asserting legal positions to protect its legal rights⁴ and the taxpayer dollars that inevitably
22

23
24 ⁴ Courts have found a defendant’s fair access to the courts impeded by permitting
25 allegations of bad faith for taking certain litigation positions. *See, e.g., Palmer by Diacon*
26 *v. Farmers Ins. Exch.*, 861 P.2d 895, 914-915 (Mont. 1993)(“To permit evidence of
27 insurers’ litigation strategies and tactics is to impede insurers’ access to the courts and right
28 to defend, because it makes them reluctant to contest coverage of questionable claims. ‘Free
access to the courts is an important and valuable aspect of an effective system of
jurisprudence, and a party possessing a colorable claim must be allowed to assert it without
fear of suffering a penalty more severe than typically imposed on defeated parties.’ Public
policy dictates, therefore, that courts must use extreme caution in deciding to admit such

1 will be paid to the Special Master and Plaintiffs to litigate areas that the USP leaves within
2 the discretion of TUSD.⁵ This verbiage is improper and should be stricken.

3 **III. TUSD’s USP-Compliant Programmatic Decisions Should Not be Disturbed**

4 This Court must review this issue *de novo* pursuant to Fed. R. Civ. P. 53, and must
5 uphold the District’s evaluation instruments if each “conforms to the consent decree entered
6 into by the parties and ... is compatible with the Constitution.” *United States v. South Bend*
7 *Community School Corp.*, 511 F. Supp. 1352, 1360 (N.D. Ind. 1981). As neither the
8 Mendozas nor the Special Master has asserted TUSD’s TPE procedures are
9 unconstitutional, the Court must determine whether the instruments conform to the USP.
10 This limited review is consistent with controlling case law, which dictates that the “Court is
11 not here to act as a ‘super school board’ and is mindful of its role; the Court does not intend
12 to micro-manage programmatic decisions by the District and will defer to reasonable
13 proposals by the District.” *See* ECF 1477; *see also Anderson v. Canton Mun. Separate*
14 *School Dist.*, 232 F.3d 450, 454 (5th Cir. 2000); *Richmond Welfare Rights Org. v.*
15 *Snodgrass*, 525 F.2d 197, 207 (9th Cir. 1975) (“Except as last-resort refuges for the
16 protection of constitutional rights, courts should not attempt to function as super school
17 boards”); *Swann v. Charlotte-Mecklenburg Bd. of Ed.*, 402 U.S. 1, 12 (1971), quoting
18 *Brown v. Bd. of Ed., Brown II*, 349 U.S. 249, 299 (1955) (“School authorities have the
19 primary responsibility for elucidating, assessing, and solving these problems; courts [] have
20 to consider whether the action of school authorities constitutes good faith implementation of
21 the governing constitutional principles.”).

22 Here, the R&R contends the weights TUSD has assigned to student/teacher surveys
23 is a “clear violation” of USP § IV.H.1.iii, requiring “adequate weight” be given to student
24

25 evidence even if it is relevant to the insurer's] initial decision to deny the underlying
26 claim.”)(citations omitted)

27 ⁵ *See Tonti v. Petropoulos*, 656 F.2d 212, 220 (6th Cir. Ohio 1981)(Courts in
28 desegregation cases must carefully evaluate payment of public funds to determine whether
they achieve the desegregation purpose.)

1 and teacher surveys. When the USP specifies no specific percentage and there is agreement
 2 to the 10% weight afforded student surveys in teacher evaluations, how in the world can the
 3 10% weight assigned in the principal evaluation instrument to student/teacher surveys
 4 amount to a “clear” violation of the USP? It is clear that it does not, and for that additional
 5 reason this recommendation should be rejected.

6 The recommendation to increase these surveys’ weight from 10% to 17% also should
 7 be denied because it is outside of USP mandates and interferes with micro-programmatic
 8 decisions rightfully in the hands of TUSD. The principal evaluation instrument was
 9 developed based on analysis conducted by a Principal Evaluation Committee (PEC)
 10 comprised of lifetime educators. *See* ECF 1845-9 at 33-35. The PEC considered the
 11 recommendations of the Special Master and his implementation committee member, Dr.
 12 Vicky Balentine. *Id.* As a result, TUSD, pursuant to the Special Master’s recommendations,
 13 increased the survey weight in the current instrument to 10% from the prior principal
 14 evaluation model of 7%. *See* ECF 1845-9 at 33. However, asking the Court to substitute
 15 the judgment of others as to what is “adequate” and impose this policy change improperly
 16 inserts the Plaintiffs and Special Master (and this Court) into the role of a super school
 17 board. The R&R does not allege 10% is either inadequate or unreasonable – and this Court
 18 must defer to TUSD’s reasonable proposals. *See* ECF 1477. Accordingly, the Mendoza
 19 objections should be overruled and the R&R rejected.

20
 21 **IV. USP § IV.H Permits TUSD to Consider State Law and Other Measures the
 District Deems Appropriate.**

22 Not only does the relevant case law direct that TUSD’s programmatic decisions not
 23 be disturbed, but the USP expressly affords TUSD discretion in this instance. In addition to
 24 the specific measures required by § IV.H.1, this provision also specifically protects the
 25 District’s discretion to ensure the principal evaluation instrument also addresses
 26 “requirements of State law and other measures the District deems appropriate. . . .” §
 27 IV.H.1 (emphasis added). As stated above, the PEC developed the principal evaluation
 28 instrument to comply with § IV.H.1 and Arizona law, and after considering

1 recommendations from the Special Master and Dr. Balentine, increased the weight of
 2 opinion surveys from 7% to 10%. ECF 1845-9 at 33-35. The District arrived at the weight
 3 allocations, in part, from three months of collaborations and negotiations with Educational
 4 Leaders, Inc. (ELI), the collective bargaining voice of the District's school principals. *See*
 5 Decl. Erickson ¶ 3. The 10% weight was agreed to reluctantly by ELI despite its concern
 6 that increasing the weight of a subject measure (student/teacher evaluations) to 10%
 7 necessitated a decrease in the weight of other objective measures (principal performance).
 8 *Id.* ¶ 5-7. For this further reason, the 10% weight should not be disturbed.

9 **V. The Recommendation for 17% is Not Based on any Facts or Research.**

10 The R&R cites neither research nor examples of how, if at all, other school districts'
 11 principal evaluation instruments vary from what the District proposes. Based on the
 12 District's review of the opinion given by the expert in the field it consulted, it appears no
 13 such research exists.

14 Because the Special Master's assertion regarding assigning weights was facially
 15 unsupported, the District consulted Dr. Alyson Lavigne, a Roosevelt University Professor
 16 and expert in the field of best practices for improving the quality of the educational
 17 evaluation process, to determine whether research in the area was available to inform the
 18 issue. She has provided a declaration, attached, and her opinion is that there is not sufficient
 19 research to support the Special Master's proposal. *See* Decl. Lavigne ¶ 6.

20 It seems the Special Master's recommendation for 17% comes "out of thin air."⁶ The
 21 R&R merely concludes "[w]hat better way to measure whether principals have
 22 accomplished these things than by asking teachers and students." *See* ECF 1845 at 5. That
 23 may or may not be the case (Dr. Lavigne in her declaration tells us there is insufficient
 24

25 ⁶ TUSD appreciates the fact that the Special Master is a desegregation expert, but
 26 does not know if the Special Master designates himself as an expert in the allocation of
 27 weights in principal and teacher evaluations. Even if that is the case, in order to rely on *any*
 28 expert's opinion, it cannot simply be adopted at face value and must be based upon
 sufficient admissible facts or data. *See* Fed. R. Evid. 702. No facts or data are presented
 here.

1 research on the issue), but the existing TUSD instrument already does precisely what the
 2 Special Master has recommended by including student/teacher surveys as 10% of the
 3 principal evaluation.

4 Furthermore, the Special Master’s recommendation that teacher evaluations should
 5 carry more weight in principal evaluations is inconsistent with his view that principals
 6 should not be the evaluator of teachers due to biases relating to professional and social
 7 relationships between teachers and principals. *See* ECF 1845-9 at 597.

8 The arbitrary nature of the Special Master’s 17% recommendation also is evidenced
 9 by the fact that between May and September he thrice has modified without stating any
 10 reason the recommended weight allocation between student and teacher evaluation
 11 surveys.⁷ Likewise, the Mendozas never once in their objections explained any basis for
 12 their complaint. *See, e.g.*, ECF 1845-8 at 3, ECF 1845-9 at 621. According to Dr. Lavigne,
 13 increasing the weight of student/teacher surveys in principal evaluations, particularly with
 14 no supporting research, may do more harm than good. *See* Decl. Lavigne ¶ 6.

15
 16 **VI. Increasing the Weight of Student/Teacher Opinion Surveys Requires Giving
 Less Weight to the Objective Principal Performance Measure.**

17 The Recommendation avers that there is “no reason” not to increase the survey
 18 weight. But there indeed is a reason – and a good one: implicit in the Special Master’s
 19 request that the weight of student/teacher surveys be increased by 7% is that the weight of
 20 other components of the principal evaluation model – components for which the USP
 21 requires “adequate weight” be given – must be given less importance. The R&R neither
 22

23
 24 ⁷ *See* 5/1/15 Special Master Memo, ECF 1845-10 at 148 (“The weight of teacher and
 25 student surveys should total 17% but should be divided equally.”); 8/28/15 R&R, ECF 1836
 26 at 12 (“The Special Master therefore recommends that of the 100 total points for measuring
 27 principal performance, teacher surveys account for 11 points and student surveys account
 28 for six. Alternatively, 12 points could be for teacher surveys and five for student surveys.”);
 9/25/15 R&R, ECF 1845 at 6 (“The Special Master therefore recommends that of the 100
 total points for measuring principal performance, teacher surveys account for 11 points and
 student surveys account for six. [the alternative recommendation for 12% and 5% split was
 withdrawn]”).

1 acknowledges this nor suggests what other aspect(s) of principal evaluations should be
 2 given less weight. The principal evaluation components under TUSD’s 2015-16 Principal
 3 Evaluation Model are as follows: Principal Performance - 57%; Student Academic Progress
 4 - 33%; SAI (Teacher) Survey on Leadership (ADE)⁸ - 2%; Teacher Survey - 4%; Student
 5 Survey - 4%. *See* Pie Chart, ECF 1845-1 at 1.

6 If teacher surveys are increased from 6 to 11% and student surveys from 4 to 6%,
 7 than other USP-aligned components must be reduced by 7%. The Student Academic
 8 Progress measure, currently at 33%, cannot be reduced. *See* A.R.S. 15-203(A)(38).⁹
 9 Accordingly, by default, the Special Master recommends decreasing the current 57%
 10 weight of the Principal Performance Measure to the minimum allowable weight of 50%
 11 because “there is no reason not to do so.” This component should not be reduced because it
 12 is an objective measure of principal performance, and includes the following USP-aligned¹⁰
 13 components: Culture and Equity Leadership, Instructional Leadership, Human Resources
 14 Leadership, Strategic Leadership, Organizational Leadership, and Community Leadership.
 15 *See* ECF 1845-10 at 71-106. The PEC determined these aspects of site leadership should
 16 constitute 57% of the total evaluation score, and that judgment should not be disturbed.

17 **VII. Conclusion**

18 Based on the foregoing, TUSD respectfully requests that the Special Master’s R&R
 19 on Teacher and Principal Evaluations be denied. Oral argument is requested for the same
 20

21 ⁸ SAI stands for “Standards Assessment Inventory.” The SAI is an assessment
 22 developed by the Arizona Department of Education (ADE) that anonymously measures
 23 teachers’ perceptions to provide important data on the quality of professional learning at the
 school or system level.

24 ⁹ A.R.S. 15-203(A)(38) requires the State Board of Education to “adopt and maintain
 25 a model framework for a teacher and principal evaluation instrument that includes
 26 quantitative data on student academic progress that accounts for between thirty-three
 percent and fifty per cent of the evaluation outcomes.”

27 ¹⁰ The Principal Performance Measure addresses specific USP provisions including
 28 measuring “efforts by principals to create school conditions, processes, and practices that
 support learning for racially, ethnically, culturally and linguistically diverse students” and
 “teacher and principal use of classroom and school-level data to improve student outcomes,
 target interventions, and perform self-monitoring.” *See* USP §§ IV.H.1.i.II and 1.ii.

1 reasons as set forth in TUSD’s Motion for Hearing/Status Conference recently filed with
2 the Court (ECF 1846).

3 DATED this 2nd day of October, 2015.

4 **RUSING LOPEZ & LIZARDI, P.L.L.C.**

5
6 s/ J. William Brammer, Jr.
7 J. William Brammer, Jr.
8 Patricia V. Waterkotte
9 Attorneys for Tucson Unified School District No.
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17 **ORIGINAL** of the foregoing filed via the CM/ECF
18 Electronic Notification System and transmittal of a
19 Notice of Electronic Filing provided to all parties
20 that have filed a notice of appearance in the District
21 Court Case, as listed below.

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24 s/ Jason Linaman

EXHIBIT 1

Declaration of Alyson Leah Lavigne, Ph.D.

I, Alyson Leah Lavigne, Ph.D., declare under penalty of perjury that the following statements are true:

1. I am above the age of 18 and am competent to make this Declaration. I am an Assistant Professor in Curriculum Studies at Roosevelt University, and have personal knowledge regarding the facts stated herein. This declaration is based upon my personal knowledge, information and belief.

2. I hold a BA in Psychology from Mount Holyoke College, an MA in Educational Psychology from the University of Arizona, and a PhD in Educational Psychology from the University of Arizona.

3. My professional affiliations include the following: American Educational Research Association, American Psychological Association, and National Association for Multicultural Education.

4. I have published many articles on evaluation and related issues, and this year published a book entitled “Improving Teaching Through Observation and Feedback” regarding best practices for improving the quality of the evaluation process. I have significant expertise in the area of instructional leadership and have conducted two large studies examining principals’ perspectives in teacher evaluation.

5. A true and correct copy of my curriculum vitae is attached hereto as **Exhibit A.**

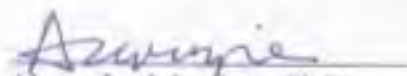
6. I have reviewed the Special Master’s Amended Report and Recommendation filed September 25, 2015 and have formed opinions regarding the adequacy of the weight afforded teacher and student surveys in the evaluation of principals. These opinions include my findings of:

- A lack of sufficient research that suggests assigning a higher weight value to student surveys in principal evaluation is any more adequate than assigning a lower weight value.
- A lack of sufficient research that suggests assigning a higher weight value to teacher surveys in principal evaluation is any more adequate than assigning a lower weight value.
- The absence of sufficient research suggesting all three surveys should be weighted almost equally in principal evaluation.
- In the absence of sufficient research supporting the adequacy of a particular weight for student or teacher surveys in principal evaluation, a higher weight value has the potential to do more harm than good.
- An increase in weight assigned to the teacher and student surveys in principal evaluation would result in a reduction in weight assigned to the six principal performance areas. There is insufficient evidence suggesting that a reduction in weight in those areas would be any more adequate than the current assigned weight.
- Weights should be assessed based on reliability and validity data of the actual instrument and as it pertains to the relationship to a principal's effectiveness - as measured by both what they do (performance) and the outcomes they seek to achieve (student achievement growth).

7. Defining "meaningful" and "adequate" primarily on numeric qualities (such as weight) ignores the quality of a measure. A poor measure can be assigned a substantial weight, but this will have little meaning for principals if it is not reliable, valid, or does not help principals improve their practices.

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

DATED this 2nd day of October, 2015.

A handwritten signature in cursive script, appearing to read "Alyson", written over a horizontal line.

Alyson Leah Lavigne, Ph.D.
Assistant Professor, Curriculum Studies
College of Education
Roosevelt University

EXHIBIT A

Revised October 2015

ALYSON LEAH LAVIGNE

(pka Alyson Lavigne Dolan)

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Phone: 312-853-4773 | Email: allavigne@roosevelt.edu

EDUCATION

- 2010 Ph.D. Educational Psychology, University of Arizona, Tucson, AZ
Minor: Family Studies and Human Development
Dissertation: *Beginning teachers who stay: How beliefs buffer the challenges of the first years of teaching.*
Chair: Mary McCaslin, Ph.D.
- 2007 M.A. Educational Psychology, University of Arizona, Tucson, AZ
Thesis: *Social class and early childhood education: An exploratory study of classroom practices.*
Chair: Mary McCaslin, Ph.D.
- 2003 B.A. Psychology, Mount Holyoke College, South Hadley, MA
Minor: Sports Science (Smith College)

RESEARCH INTERESTS

Policy as it relates to teacher evaluation and teacher retention; student and teacher motivational dynamics and classroom practices, particularly in schools that serve Latin@ students

CURRENT APPOINTMENT

ROOSEVELT UNIVERSITY | Chicago, IL

2015-Present

CAEP Self-Study Coordinator, College of Education

Work with the Dean of the College of Education and the Assessment and Grants Director to collect, evaluate, and plan for the Council of Accreditation of Educator Preparation (CAEP) self-study needs of the College of Education.

2010-Present

Assistant Professor, College of Education

Teach a 3-3 load using various delivery methods (e.g., online, face-to-face, hybrid, videoconference) to undergraduate and graduate students seeking initial and subsequent certifications in teaching, and to doctoral students seeking degrees in Pk-12 and higher education administration. Courses:

- ELOC 685 - Advanced Quantitative Methods
- ELOC 589 - Research Writing
- ELOC 401 - Action Research and Data Analysis
- EDUC/SPED 407/CHS 457-Topics and Issues in Human Development
- EDUC 311/411 - Adolescent Development
- EDUC 210 - Child Development for Educators
- EDUC 303 - Health for Educators
- EDUC 001- College of Education Learning Community First Year Course

PUBLICATIONS (* Student)

BOOKS

- Lavigne, A. L., & Good, T. L.** (2015). *Improving teaching through observation and feedback: Going beyond state and federal mandates*. New York: Routledge.
- Oberg De La Garza, T., & **Lavigne, A. L.** (2015). *Salsa dancing in gym shoes: Exploring cross-cultural missteps with Latinos in the classroom*. Chicago: Advanced Classroom Strategies, Inc.
- Lavigne, A. L., & Good, T. L.** (2014). *Teacher and student evaluation: Moving beyond the failure of school reform*. New York: Routledge.

BOOK CHAPTERS

- Lavigne, A. L., & Oberg De La Garza, T.** (in press). The practice and evaluation of culturally responsive literacy for English Language Learners in the 21st century. Invited chapter prepared for R. Allington and R. Gabriel (Eds.), *Evaluating literacy instruction: Principles and promising practices*. New York: Routledge
- Lavigne, A. L., & Dalal, Y.*** (2015). Teacher knowledge, beliefs, attitudes. Invited chapter in W. G. Scarlett (Ed.), *Classroom management: An A-to-Z guide*. Thousand Oaks, CA: Sage Publications.
- McCaslin, M., & **Lavigne, A. L.** (2010). Social policy, educational opportunity, and classroom practice: A co-regulation approach to research on student motivation and achievement. Invited chapter in T. Urdan, S. Karabenick, & F. Pajares (Eds.), *Advances in motivation and achievement* (Vol. 16, pp. 211-249). London: Emerald Group.
- Dolan, A. L.** (2009). Teacher recruitment, retention, supply, and demand. Invited chapter in T. L. Good (Ed.), *21st century education: A reference handbook* (Vol. 2, pp. 3–11). Thousand Oaks, CA: Sage Publications.

PEER-REVIEWED ARTICLES

- Oberg De La Garza, T., **Lavigne, A. L., & Mackinney, E.** (in press). Dual language instruction and the academic achievement of English Language Learners. In P. Konkol & S. Stumme (Eds.), *Midwestern perspectives on bilingual education: Changing demographics and educational challenges and opportunities, a special issue for Mid-western Educational Researcher*.
- Lavigne, A. L., & Bozack, A. R.** (2015). Successes and struggles of teaching: Perspectives of beginning, mid-career, and veteran teachers. *Journal of Teaching Effectiveness and Student Achievement*, 2(2), 68–80.
- Lavigne, A. L.** (2014). Beginning teachers who stay: Beliefs about student learning. *Teaching and Teacher Education*, 39, 31–43.

PEER-REVIEWED ARTICLES, CONT.

- Lavigne, A. L.** (2014). Exploring the implications of high-stakes teacher evaluation on schools, teachers, and students. *Teachers College Record*, 116(1).
- Good, T. L., Wood, M., Sabers, D., Olson, A. M., **Lavigne, A.**, Sun, H., & Kalinec Craig, C. A. (2013). Strengthening grade 3-5 students' foundational knowledge of rational numbers. *Teachers College Record*, 115(7).
- Dolan, A. L.**, & McCaslin, M. (2008). Student perceptions of teacher support. *Teachers College Record*, 110(11), 2423–2437.
- Chang, G. C., McNamara, T. K., Orav, E. J., Koby, D., **Lavigne, A.**, Ludman, B., . . . Wilkins-Haug, L. (2005). Brief intervention for prenatal alcohol use: A randomized trial. *Obstetrics & Gynecology*, 105, 991–998. doi:10.1097/01.AOG.0000157109.05453.84

NON PEER-REVIEWED ARTICLES

- Good, T. L., & **Lavigne, A. L.** (2015). Rating teachers cheaper, faster, and better: No so fast [Peer commentary on the paper, “Can we identify a successful teacher better, faster, and cheaper? Evidence of innovating teacher observation systems” by J. Gargani & M. Strong]. *Journal of Teacher Education*, 66(3), 288–293.
- Good, T. L., & **Lavigne, A. L.** (2015). Issues of teacher performance stability are not new: Limitations and possibilities [Peer commentary on the paper, “The stability of teacher performance and effectiveness: Implications of policies concerning teacher evaluation” by G. B. Morgan, K. J. Hodge, T. M. Trepinksi, & L. W. Anderson]. *Education Policy Analysis Archives*, 23(2).
- Lavigne, A. L.**, Good, T. L., & Marx, R. W. (2014). Introduction to high-stakes teacher evaluation: High cost—big losses. *Teachers College Record*, 116(1).

EDITED SPECIAL ISSUES

- Lavigne, A. L.**, Good, T. L., & Marx, R. W. (Eds). (2014). High-stakes teacher evaluation: High cost—big losses [Special issue]. *Teachers College Record*, 116(1).

TECHNICAL REPORTS

- Kuck, C., Taylor, S., Chamberlain, R., **Lavigne, A.**, & Borkorm, B. (2015). *Teacher evaluation design and implementation research study*. Final report submitted to district.
- Chamberlain, R. W., & **Lavigne, A. L.** (2014). *Teacher evaluation in Illinois: Perceptions from the field*. Final report submitted to the Illinois Principals Association.

UNDER REVIEW & IN PREPARATION

- Lavigne, A. L.**, & Chamberlain, R. (revised and resubmitted). Teacher evaluation in Illinois: School leaders' perceptions and practices. Revision submitted to *Educational Assessment, Evaluation, and Accountability*.

UNDER REVIEW & IN PREPARATION, CONT.

Lavigne, A. L., & Good, T. L. (invited, under review). Citing, being cited, not citing, and not being cited. In J. Plucker & M. Makel (Eds.), *Doing good social science: Trust, accuracy, transparency*. Washington, DC: American Psychological Association.

Lavigne, A. L., & Good, T. L. (under contract). *Moving beyond the damage of Race to the Top: Building useful programs of teacher development and evaluation*. New York: Routledge.

Good, T. L., **Lavigne, A. L.**, & López, F. (under contract). *Looking in classrooms* (12th ed.). New York: Routledge.

Lavigne, A. L., & Good, T. L. (in preparation). Costly but simplistic reform fails again. Op-ed in preparation for *Education Week*.

Lavigne, A. L. (in preparation). Teacher evaluation under Race to the Top: Capacity, needs, and the role of context. Manuscript being prepared for submission to the *Educational Administration Quarterly*.

Dexter, A., Oberg De La Garza, T., & **Lavigne, A. L.** (in preparation). Teachers communicating care across culture and language: A comparative study examining what might be lost in translation. Manuscript being prepared for submission to *Anthropology & Education Quarterly*.

Meunch, C.*, **Lavigne, A. L.**, & Stadler, H. A. (in preparation). The knowing-doing gap in teacher evaluation.

PRESENTATIONS**PEER-REVIEWED**

Oberg De La Garza, Mackinney, E., & **Lavigne, A. L.** (accepted). *Existing and emerging dual language programs in Illinois*. Submitted to the Annual Conference of the Midwestern Educational Research Association.

Oberg De La Garza, T., Mackinney, E., & **Lavigne, A. L.** (accepted). Developing dual language programs for educators. Accepted for presentation at the Annual Conference of La Cosecha. Albuquerque, NM.

Lavigne, A. L. (accepted). *Observing and evaluating dual language teachers*. Accepted for presentation at the Annual Conference of La Cosecha. Albuquerque, NM.

Kuck, C. L., Borkorm, B., Chamberlain, R., **Lavigne, A. L.**, & Taylor, S. (accepted). *PERA early implementer: A district's capacity for change*. Paper accepted for presentation at the Illinois Education Research Council's Focus on Illinois Education Research Symposium. Lisle, IL.

Mackinney, E., **Lavigne, A. L.**, & Oberg De La Garza, T. (accepted). *Towards a bilingual Illinois: Dual language program development*. Paper accepted for presentation at the Illinois Education Research Council's Focus on Illinois Education Research Symposium. Lisle, IL.

PEER-REVIEWED PRESENTATIONS, CONT.

- Oberg De La Garza, T., & **Lavigne, A. L.** (2015, March). *Exploring culturally relevant literacy practices with Latino students*. Chicago State University Culturally Relevant Instruction Conference, Chicago, IL.
- Oberg De La Garza, T., & **Lavigne, A. L.** (2014, November). *Culturally responsive teaching and texts to authentically engage Latino students in mainstream and bilingual classrooms*. Workshop presented at the National Association for Multicultural Education. Tucson, AZ.
- Oberg De La Garza, T., Roberts, A., & **Lavigne, A. L.** (2013, November). *Cross-cultural relationships: Fostering belonging and achievement of Latino students in U.S. schools*. Paper presented at the annual meeting of the World Education Research Association, Guanajuato, Guanajuato, México.
- Lavigne, A. L.**, & Bozack, A. R. (2013, October). *Breakthroughs and struggles of beginning, mid-career, and veteran teachers*. Paper presented at the Northeastern Educational Research Association. Rocky Hill, CT.
- Roberts, A., **Lavigne, A. L.**, & Oberg De La Garza, T. (2013, April). *Care and culture: Supporting Latino success through teacher-student relationships*. Paper presented at the Society for Psychological Anthropology Annual Meeting, San Diego, CA.
- Oberg De La Garza, T., **Lavigne, A. L.**, & Roberts, A. L. D. (2012, November). *Do teachers effectively communicate care for Latino students?* Poster presented at the annual conference of the Illinois Association of Teacher Educators, Lisle, IL.
- Roberts, A. L. D., **Lavigne, A. L.**, & Oberg De La Garza, T. (2012, November). *Care and culture: Supporting Latino success through teacher-student relationships*. Paper presented at the annual conference of the Mid-western American Educational Research Association, Evanston, IL.
- Sun, H., Olson, A., **Lavigne, A. L.**, Claessens, L., & Hernandez, D. (2012, August). *A comparative study of college students' achievement motivation in three cultures*. Paper presented at the annual convention of the American Psychological Association, Orlando, FL.
- Lavigne, A. L.** (2012, April). *Understanding teacher retention: Exploring beginning and veteran teachers*. Paper presented at the annual meeting of the American Educational Research Association, Vancouver, British Columbia, Canada.
- Lavigne, A. L.**, McCaslin, M., & Good, T. L. (2010, November). *Beliefs as buffers of the first year of teaching: Does context matter?* Poster presented at the annual meeting of the Arizona Educational Research Organization, Phoenix, AZ.
- Dolan, A. L.**, McCaslin, M. M., & Good, T. L. (2009, April). *Stability of first-year teaching practices across time and social class*. Paper presented at the annual meeting of the American Educational Research Association, San Diego, CA.

PEER-REVIEWED PRESENTATIONS, CONT.

- Florez, I. R., & Dolan, A. L. (2008, November). *Developing a case-based, problem-based assessment course: Using a sociocultural model in early childhood teacher preparation*. Workshop presented at the meeting of the National Association for the Education of Young Children.
- Bozack, A. R., Dolan, A. L., & Vega, R. (2008, June). *Predicting retention: Certification, teacher practices, and career perceptions*. Paper presented at the 15th Annual International Learning Conference, Chicago, IL.
- Dolan, A. L., McCaslin, M. M., & Good, T. L. (2008, August). *Teaching practices in early childhood education: Does socioeconomic status matter?* Poster presented at the meeting of the American Psychological Association, Boston, MA.
- Dolan, A. L. (2007, August). Student perceptions of teacher support. In M. McCaslin (Ed.), *Symposium on school reform matters*. Paper presented at the meeting of the American Psychological Association, San Francisco, CA.
- Dolan, A. L., Good, T. L., McCaslin, M. M., Wiley, C. R. H., & Bozack, A. R. (2007, April). *First-year teacher retention and classroom practices*. Paper presented at the meeting of the American Educational Research Association, Chicago, IL.

NON-PEER REVIEWED

- Lavigne, A. L. (2015, June). *Assessing the assessments*. Invited workshop for the Illinois Migrant Educators Statewide Workshop. Lisle, IL.
- Lavigne, A. L. (2015, June). *Using picture books*. Invited workshop for the Illinois Migrant Educators Statewide Workshop. Lisle, IL.
- Oberg De La Garza, T., & Lavigne, A. L. (2015, April). *Culturally relevant, balanced literacy instruction*. Illinois Migrant Educators Annual Workshop. Peoria, IL.
- Lavigne, A. L. (2015, April). *From dissertation to research program*. Symposium participant for the Division C Graduate Student Seminar at the Annual Conference of the American Educational Research Association. Chicago, IL.
- Oberg De La Garza, T., Lavigne, A. L., & Garcia Ansani, E. (2015, March). *Salsa dancing in gym shoes: A critical conversation about students, culture, and education*. Critical Conversations in Policy and Social Justice Series hosted by the Center for Policy & Social Justice. Concordia University – Chicago. River Forest, IL.
- Lavigne, A. L. (2014, October). *Race to the Top in Illinois: Understanding school leaders' capacity to implement teacher evaluation*. Invited paper presented at Implementation of Educator Evaluation Systems: Examining Problems of Practice, a conference co-sponsored by the Northeast Educator Effectiveness Research Alliance at the Regional Educational Laboratory Northeast and Islands (REL-NEI) at EDC and the National Center for Teacher Effectiveness (NCTE) at Harvard University.

NON-PEER REVIEWED, CONT.

Lavigne, A. L., & Chamberlain, R. (2014, January). *Coping with increased demands for teacher evaluation: School leaders' perceptions of problems and possibility*. Invited paper presented at Using Observational and Student Achievement Data to Improve Teaching. Tucson, AZ.

Lavigne, A. L. (2012, October). *Exploring the implications of high-stakes teacher evaluation on schools, teachers, and students*. Invited presentation at High-Stakes Teacher Evaluation: High Cost- Big Losses, Tucson, AZ.

MEDIA CONTRIBUTIONS

Lavigne, A. L. (2015). The Voice on Vialogues: Exploring the intended and unintended consequences of high-stakes teacher evaluation.

<https://vialogues.com/vialogues/browse/related/20038>

UNDER REVIEW & IN PREPARATION

Lavigne, A. L., Olson, A. M., & Reina, C. (under review). *Teacher evaluation through the eyes of the principal: How the role of experience and school context shape perceptions*. Submitted to the Annual Conference of the American Educational Research Association.

GRANTS, HONORS, AND AWARDS

FUNDED & AWARDED

2015	Faculty Research Leave (awarded for Spring 2016), Roosevelt University
2015	Routledge Education Author of the Month, March 2015
2015	<i>CHOICE</i> Highly Recommended Book Designation, <i>Student and Teacher Evaluation</i>
2014	Principal Investigator. <i>Teacher evaluation: School leaders' perceptions and practices</i> . Roosevelt University Faculty Summer Research Grant (\$1,200).
2011	Principal Investigator. <i>Teacher retention project</i> . Roosevelt University Faculty Summer Research Grant (\$1,371).
2005-2010	Graduate College Fellowship, University of Arizona, Tucson, AZ
2009	Invited Participant, Division 15 Doctoral Student Research Seminar American Psychological Association
2008	Mary and Maude Miller Scholarship, University of Arizona, Tucson, AZ
2008	Erasmus Scholar Award, University of Arizona, Tucson, AZ
2008	College of Education Graduate Student Award, University of Arizona, Tucson, AZ
2008	Student Travel Award, American Psychological Association
2008	GPSC Travel Grant Award, Graduate and Professional Student Council, University of Arizona, Tucson, AZ
2006	Dixon Turcott Educational Fund Award, State of New Hampshire
2006	Mary and Maude Miller Scholarship, University of Arizona, Tucson, AZ

UNFUNDED

- 2015 *Exploring the characteristics and outcomes of Saturday language schools.* Spencer Foundation Small Research Grants. (Oberg De La Garza, T., Mackinney, E., **Lavigne, A.**, Maly, M., & Hilvers, J. ~ 49, 437)
- 2015 Roosevelt University Faculty Summer Research Grant (~ \$2,399)
- 2013 *Care across cultures: Supporting Latino success in schools.* William T. Grant Foundation Officers' Grant (**Lavigne, A. L.**, Oberg De La Garza, T., & Roberts, A. ~ \$24,881)
- 2013 *District supports and data use study.* Spencer Foundation Initiative on Data Use and Educational Improvement. (Bozack, A.R., Niemi, N.S., & **Lavigne, A.L.** ~ \$264, 066)
- 2012 Measures of Effective Teaching Early Career Grants Research Program (\$23,992)
- 2012 American Psychological Association, Division 15, Early Educational Researcher Career Award (\$7,215)

PROFESSIONAL EXPERIENCE**UNIVERSITY OF ARIZONA | Tucson, AZ**

- 2007-2010 Teaching Assistant (2007-2009) & Instructor (2009-2010)
Course: Evolution and Human Development
- 2009-2010 Research Assistant
TeKNO and Value-Added Projects
PI: Nicki Kersting, Ph.D.
- 2008 Summer Research Associate
University of Arizona Math Project
PI: Thomas L. Good, Ph.D.
- 2006-2008 Managing Editor
21st century education: A reference handbook
Editor: Thomas L. Good, Ph.D.
- 2007 Summer Research Assistant
Comprehensive School Reform Project
PIs: Thomas L. Good, Ph.D. & Mary McCaslin, Ph.D.
- 2005-2007 Research Assistant & Associate
First Year Teacher Observation Project
PIs: Thomas L. Good, Ph.D. & Mary McCaslin, Ph.D.
- 2006-2007 Research Assistant
Postdoctoral Excellence in Research and Teaching Program Evaluation
Evaluation Group for Analysis of Data
- 2006 Fall Teaching Assistant
Course: Current Issues in the Psychology of Gender
- 2006 Summer Tutor, C.A.T.S. Academics

BRIGHAM & WOMEN'S HOSPITAL | Boston, MA

2003-2005 Research Assistant I & II
 Women's Health Habits Study & Concentration and Memory Study
 Principal Investigator: Grace Chang, M.D., M.P.H.

MOUNT HOLYOKE COLLEGE | South Hadley, MA

2002-2003 Lab and Research Assistant
 Supervisor: Kathy Stansbury, Ph.D.

2001-2003 Teaching Assistant
 Course: Introduction to Psychology

2001-2002 Lab Manager
 Supervisor: Becky Wai-Ling Packard, Ph.D.

Assistant
 Gorse Child Study Center

FAY SCHOOL | Southborough, MA

2001 Summer Teacher

SERVICE

STUDENT SUPERVISION & COMMITTEES**DISSERTATION COMMITTEE MEMBER – ROOSEVELT UNIVERSITY STUDENTS**

2015 Lynda Williams. *The impact of the Performance Evaluation Reform Act on the practice, evaluation, and professional development of principals in Illinois.*

2015 Kim Qualls. *National Board Certified teachers: Do they walk the walk and talk the talk?*

2014 Cheryl Muench. *A quantitative study of teacher evaluation and the knowing-doing gap.*

2014 Christina Jesukaitis. *An analysis of the relationship between intrinsic motivation and student achievement in a diverse Montessori School.*

2013 Brian Ganan. *The Fluidez en La Lectura Oral (FLO) portion of the Indicadores Dinámicos de Exito en la Lectura (IDEL) and the English Language portion of the Illinois Standard Achievement Test (ISAT): A Correlational Study of Second and Third Grade English Language Learners.*

In Progress Karen Cullotta. *El Ranchito: The rise and fall of a police neighborhood center in a Latino community.*

SERVICE, CONT.**COLLEGE AND UNIVERSITY****Roosevelt University**

2014-Current Member, Undergraduate Council
 2014-Current Vice Chair, College Council, College of Education
 2014-Current Member, Institutional Review Board
 2013-2014 Faculty Fellow, College of Education
 2013-2014 Tri-Chair, All Students Subcommittee, Foundations of Excellence
 2012-2014 EdTPA Representative, Elementary Education Program, College of Education
 2012-2014 PIP/LOOP Representative, Elementary Education Program, College of Education,
 2013-2014 College of Education Senator, University Senate
 2012-2013 Technology Committee, College of Education
 2012-2013 Retention Course Committee, College of Education
 2012-2013 Student Support Specialist Search Committee, College of Education
 2012 ELED Program Review Committee, College of Education
 2010-2012 Student Services Committee, College of Education

University of Arizona

2006 Student Member, Faculty Search Committee (EdP), University of Arizona
 2006 Student Member, Admissions Interviews, Teaching and Teacher Education, University of Arizona

LOCAL

2012- 2013 AIM High Mentor, Companies That Care, Chicago, IL
 2012 Program Evaluation Consultant, Chicago Public Schools, Chicago, IL
 2011 Children's Home + Aid Presentation, Schaumburg, IL
 2011 Data Consultant, Ruiz Elementary School, Chicago, IL
 2011 Read Aloud Volunteer,
 Dumas Technology Academy, Chicago, IL
 Enrico Fermi School for the Performing Arts, Chicago, IL

NATIONAL

2015 Mentor, Graduate Student Seminar, Division C, AERA
 2014-Current Member, Affirmative Action Council, Division C, AERA
 2011-Current Reviewer, Annual Meeting Proposal Submissions, Division C, AERA
 2015 Ad-hoc Reviewer, *Educational Policy* (1 manuscript)
 2012-2014 Member, Paul R. Pintrich Dissertation Awards Committee, Division 15, APA
 2014 Ad-hoc Reviewer, *Teachers College Record* (1 manuscript)
 2013-2014 Ad-hoc Reviewer, *Teaching and Teacher Education* (1 manuscript)
 2013-2014 Chair, Affirmative Action Council, Division C, AERA
 2012-2013 Co-Chair, Affirmative Action Council, Division C, AERA
 2012 Ad-hoc Reviewer, *American Educational Research Journal: Teaching, Learning, and Human Development* (1 manuscript)
 2007-2011 Member, Affirmative Action Committee, Division C, AERA
 2007-2010 Campus Liaison, University of Arizona, AERA

PROFESSIONAL AFFILIATIONS

2014-current National Association for Multicultural Education
2006-current American Educational Research Association
Member, Division K, Division C, Division A, Motivation in Education SIG
2004-current American Psychological Association
Member, Division 15
2007-2008 Southwest Consortium for Innovative Psychology in Education
2004 International Psychological Students' Organization

PROFESSIONAL DEVELOPMENT

2014 La Cosecha: A Conference on Dual Language Education ~ School Site Visit
2014 Using NAEP Data on the Web for Educational Policy Research, Annual Conference of
the American Educational Research Association
2014 Beginner Spanish III, Multilingual Connections

EXHIBIT 2

Declaration of Daniel Erickson in Support of TUSD Administrator's Response to the Special Master's Amended Report and Recommendation Filed September 25, 2015

I, Daniel Erickson, declare under penalty of perjury that the following statements are true:

1. I am above the age of 18 and am competent to make this Declaration. I am the principal of Magee Middle School, President of Education Leaders, Inc. ("ELI"), and have personal knowledge regarding the facts stated herein. This declaration is based upon my personal knowledge, information and belief.

2. Since 1981, ELI has been recognized by the Tucson Unified School District (TUSD) as the collective voice of school principals, assistant principals, psychologists, and research project managers. ELI has read the special master's report and recommendation (R&R) regarding Principal Evaluation and is concerned that the recommendations are unsupported by facts or law and, if implemented, will not serve to advance TUSD's unitary status (USP) goals, improve educational opportunities for TUSD students, or create better or more effective teachers and administrators to serve those students.

3. TUSD's current evaluation criteria for principals includes 4% weighting for student survey results and 6% weighting for teacher surveys. These weights were deliberately determined through the ELI meet and confer agreement that resulted from an approximate three month process of collaboration and negotiation with TUSD regarding the evaluation of principals. ELI reluctantly agreed to the 10% total weight for student and teacher surveys as a part of that evaluation but remain convinced even that percentage affords too much weight to those surveys. Some of the reasons supporting this conviction are discussed in this declaration.

4. The special master believes that it is "incongruous" that student surveys only account for 4% of an administrator's evaluation, but 10% of a teacher's evaluation. The special master fails to recognize that teachers spend the majority of their time

working directly with students, while administrators are responsible for managing an entire school site.

5. To remedy this alleged incongruity, the special master proposes increasing the weighting of surveys in principal evaluations to 11% for teacher surveys and 6% for student surveys. The special master seems to believe that relying more on subjective student and teacher opinions is the best way to objectively measure principal performance.

6. The inherent contradiction in the special master's proposal is that by giving more weight to teacher surveys, the principal's evaluation becomes more dependent on the opinions of teachers. However, the special master already has determined that principals are not well-suited to perform teacher evaluations because of a desire to be "liked" by teachers. Based on that logic, teacher evaluations should account for less weight in a principal's evaluation, not more.

7. Further, the additional 7% weighting must be taken from the substantive evaluation of principals by directors, in which directors directly review aspects of leadership that are critical to principal proficiency, which will reduce the role of many important USP objectives in the evaluation of principals. It is unclear how such a change would enhance TUSD's USP compliance. As noted above, the special master's recommendation would make principals more dependent on being liked, rather than respected or effective, which is precisely the relational issue that caused the special master to believe principals should not evaluate teachers in the first place.

8. ELI believes that "consumer" surveys in general should be weighted equally and account for 10% of the evaluation criteria for teacher and principals alike. Student surveys should account for 10% of a teacher's evaluation, while the combination of 6% teacher surveys and 4% student surveys should account collectively for 10% of a principal's evaluation. This recognizes and properly weights the differing interactions between students, teachers, and principals.

9. The special master proposes the implementation of studies and other changes to the evaluation processes and instruments during the current school year. ELI opposes implementing these changes now. State law, TUSD policy, and the ELI meet and confer agreement provide that principals be provided with evaluation instruments and criteria at the beginning of the school year, and in any event, no later than the end of the first quarter.

10. The results of these evaluations have lasting impact on a principal's livelihood, including eligibility for multi-year contracts and other employment benefits. Our membership is entitled to know what criteria will be used to measure their performance in advance. The special master's recommendations amount to a moving target, which unfairly penalizes principals for a perceived shortcoming that is unsubstantiated by facts. The special master must understand that his proposals, although perhaps fine from a true academic or philosophical standpoint, would affect real people, with real families, and real obligations. Notwithstanding the noble goals of the USP, the special master's recommendations do not occur in a vacuum and should not be implemented during the current school year.

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

DATED this 1st day of October, 2015.



Daniel Erickson
ELI President