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

Roy and Josie Fisher, et al.,
Plaintiffs

v.
United States of America,
Plaintiff-Intervenor,

v.
Anita Lohr, et al.,
Defendants,

And

Sidney L. Sutton, et al.,
Defendants-Intervenors,

CV 74-90 TUC DCB
(Lead Case)

CV 74-204 TUC DCB
(Consolidated Case)

**FISHER PLAINTIFFS’
OBJECTIONS AND
OBSERVATIONS TO THE 2017-
2018 USP BUDGET**

Maria Mendoza, et al.
Plaintiffs,

United States of America,
Plaintiff-Intervenor,

v.
Tucson Unified School District No. One, et
al.

Defendants.

1
2 Overall it seems that the District uses the desegregation funds as an excuse to create
3 jobs and hire more employees. There is also a lack of cohesiveness in the professional
4 development proposals and a lack of significant focus on improving classroom instruction.
5 Specific questions and concerns on the District's 2017-2018 USP Budget are outlined
6 below. References for each concern or comment are given in parentheses following the
7 statement.

8 **Hiring Concerns**

- 9
- 10 1. In order to avoid hiring a Project Manager, and thus an additional salary, the Direct
11 of Desegregation should be talked with that position's responsibilities (Page 3 of 47,
12 Draft 1).
 - 13 2. Due to the decrease in magnet schools (five fewer schools in the 2017-2018 school
14 year) the Magnet Director should perform the duties outlined for the Program
15 Coordinator and corresponding administrative assistant instead of hiring an
16 employee for that new position (Page 5 of 47, Draft 1).
 - 17 3. There is no need for transition site coordinators. The Fisher Plaintiffs argue that the
18 principal role already fulfills this role (Page 7 of 47, Draft 1).
 - 19 4. Expanding the magnet coordinator position at Borton is another example of creating
20 positions because there is money available rather than due to necessity and the Fisher
21 Plaintiffs disagree with this irresponsible appropriation of funds (Page 19 of 47,
22 Draft 1).
 - 23 5. The Fisher Plaintiffs are under the impression that Dodge Middle School already
24 offers art and physical education. If incorrect, what are the current electives offered
25 at Dodge Middle School? (Page 19 of 47, Draft 1).
 - 26 6. Tucson High School already has five assistant principals and the Fisher Plaintiffs
27 would propose having one of the assistant principals serve as curriculum service
28 provider. (Page 23 of 47, Draft 1)

1 6. How many counselors does Tucson High School currently employ and how many
2 students are enrolled in the high school? (Page 24 of 47, Draft 1)

3 7. The responsibilities of the proposed Dual Language Coordinator should be
4 performed by the Director of Curriculum (Page 32 of 47, Draft 1).

5 8. What is the 1.0 position paid under desegregation at Borman, Davidson, Hughes,
6 McGee and Soleng Tom? (Draft 2)

7 9. Again, the Fisher Plaintiffs would recommend that one of the five assistant
8 principals employed by Tucson High School act as the Dean (Page 24 of 47, Draft 1).

9
10 **Professional Development Concerns**

11 1. The District says that all teachers are trained in EEI, so why does Booth-Fickett need
12 funds for EEI training? (Page 17 of 47, Draft 1)

13 2. What schools will expand AVID? (Budget criteria page 3)

14 3. The Fisher Plaintiffs request clarification of the 1:15 mentor proposal. The District
15 already has a classroom teacher shortage, so is it wise to take more teachers out of
16 the classroom? (Page 28 of 47, Draft 1)

17 4. A 24 hour course in EEI is not sufficient for new teachers. What is the structure
18 going forward? (RFI #990)

19 5. What does research say about online professional development? How does this
20 improve instruction? (Page 28 of 47, Draft 1)

21 6. What schools will be involved in Microsoft Professional Learning Program? (Page
22 42 of 47, Draft 1)

23 **Transition Plans (broken down by school)**

24 **Ochoa:** Scores are below average in both ELA and Math.

25 1. What is the plan to strengthen Tier 1 Instruction?

26 2. How will the common daily lesson plan, engagement, questioning, differentiation,
27 Daily Five and balance literacy be implemented?

- 1 3. When will the training take place?
- 2 4. What are Big Brainz and Imagine Learning?
- 3 5. How will the ongoing professional development be implemented and what teachers
- 4 will be included?
- 5 6. What are specific duties of the Transition Coordinator and how do they differ from
- 6 the principal's responsibilities?
- 7 7. What is NSGRA?
- 8 8. When will the curriculum be aligned and how will Tier 2 support be implemented?
- 9 9. What is Solution Tree and what is the goal behind the CFA calendar?

10
11 **Robinson:** The following positions seem to overlap: Transition Coordinator, Curriculum
12 Service Provider, Reading Recovery Specialist, Math Service Provider and MTSS
13 Facilitator.

- 14 1. Who is doing the training for Daily 5 and Balanced Literacy?
- 15 2. What is structure of targeted intervention?

16
17 **Utterback:**

- 18 1. Who will be placed in RTI classes?

19
20 **Cholla:** The following positions seem to overlap: Transition Coordinator, Instructional
21 Data Coordinator, Intervention Coordinator (2) and Data Coach.

- 22 1. How will professional development be conducted?

23
24 **Pueblo:**

- 25 2. What is the Gradual Release of Responsibility and how does it improve Tier 1
- 26 Instruction?

- 1 3. Are all teachers going to be required to submit lesson plan notebooks or will the
- 2 principal simply look at them when visiting the class?
- 3 4. What is Think Through Math?
- 4 5. When will curriculum alignment be done?
- 5 6. When will PD on formative assessments be done?
- 6 7. What is the purpose of the transition coordinator?
- 7 8. What is the basis for the theory that attendance in CR classes will improve
- 8 achievement and attendance? Has the school done any studies or is justification
- 9 anecdotal?

10 **Programs**

- 11 1. What is the magnet integration initiative (Page 2 of 47, Draft 1)?
- 12 2. The dual language expansion has not proved to increase academic achievement as
- 13 they stand so there is no supported basis for expansion (Page 4 of 47, Draft 1).
- 14 3. The plan to provide an express bus to Santa Rita to draw students from across the
- 15 district does not provide a unique offering. All of the high schools offer Pima
- 16 College classes for credit and there are Pima College campuses close to several other
- 17 schools. The Southwest Campus borders the Pueblo and Cholla service areas. The
- 18 downtown campus borders the Tucson High and Catalina High campuses.
- 19 4. What schools will participate in the Magnet Schools Conference? (Page 6 of 47,
- 20 Draft 1)
- 21 5. The Fisher Plaintiffs request more information on how teachers would be accessible
- 22 to students in Think Through Math (Page 9 of 47, Draft 1).
- 23 6. Does the Big Brainz program include teacher support? (Page 10 of 47, Draft 1)
- 24 7. The Fisher Plaintiffs request more information on Imagine Learning. Regardless,
- 25 implementing this program along with Think Through Math and Big Brianz generate
- 26 the question as to why there is a scatter shot approach to interventions? (Page 13 of
- 27 47, Draft 1)

- 1 8. What is reason for expanding IB Program at Cholla? What is the enrollment and
2 what is the academic performance of students who were enrolled? (Page 14 of 47,
3 Draft 1)
- 4 9. Instead of hiring outside tutors, Holladay should hire their own academic tutors
5 (Page 21 of 47, Draft 1).
- 6 10. The Fisher Plaintiffs request more information regarding enrollment in CRC classes
7 (Page 34 of 47, Draft 1).
- 8 11. Is the CRC Global Issues class an elective or requirement? (RFI #1001)
- 9 12. What is the justification for increasing the number of CRC teachers? No enrollment
10 numbers were given. (RFI # 1002)
- 11 13. What is MASSD Math Tutoring? (Budget criteria Page 7)
- 12 14. What is the structure for the AASD STEM program and what students will be
13 enrolled? (Budget criteria Page 8)
- 14 15. Where is the extracurricular tutoring being held and how is it being delivered?
15 (Budget criteria Page 9)

16 **General Concerns**

- 17 1. Regarding the interactive kiosks, is there any supportive information on the
18 effectiveness of these kiosks and how will they be maintained? (Page 3 of 47, Draft
19 1)
- 20 2. What is the current level of funding for schools? (Page 17 of 47, Draft 1)
- 21 3. What is current capital allotment for schools? (Page 22 of 47, Draft 1)
- 22 4. At Davis, why is the librarian being funded with desegregation funds?
- 23 5. At Mansfield, what is the number of students to be served by the magnet counselor
24 and how many other counselors are there? What is total school population?
- 25 6. At Mansfield, what results has the school seen in the certified tutor program? When
26 are students tutored?
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7. At Tucson High, what is the role of the magnet counselor? How many other counselors does the school have and what is the ratio of students to counselor?
8. At Bloom, what are the statistics on the dual language program? How many students are being served and what are the achievement levels?
9. At Sabino, why are added duty and classified position funded with desegregation funds?
10. At Mary Meredith, why is added duty funded with desegregation funds?
11. At Miles, what is the .12 teacher position?
12. At ALE, where are the 5.2 FTE housed? (\$1,645,142)
13. In the AAAATF, what are the 1.125FTE?
14. The plan to use vacancy savings for summer programs makes the programs random and less effective since schools do not have time to plan quality programs if they are unaware of the presence and specific quantity of funds available.
15. What is the justification for reduction in number of student success specialists? Who will provide the services?
16. Automatically enrolling students with potential in AP classes is not a good plan. What are the statistics on the pilot program to justify this procedure? Parents should not have to opt-out of classes that are not required. They should opt-in.
17. The African American Task Force recommendations for reading did not call for separate reading programs for African American students. It called for a uniform across the district reading program. Forcing teachers to do separate instruction for specific students can lead to resentment on the teachers' parts.
18. Summer STEM was also not part of the Task Force recommendations.

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Respectfully submitted,

Rubin Salter, Jr.
Rubin Salter, Jr.
Attorney for the Fisher Plaintiffs

Dated: July 17, 2017

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2017, I electronically submitted the foregoing **FISHER PLAINTIFFS' OBJECTIONS AND OBSERVATIONS TO THE 2017-2017 USP BUDGET** for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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