

1 P. Bruce Converse (#005868)
bconverse@dickinsonwright.com
2 Timothy W. Overton (#025669)
toverton@dickinsonwright.com
3 **DICKINSON WRIGHT PLLC**
1850 N. Central Avenue, Suite 1400
4 Phoenix, Arizona 85004-4568
courtdocs@dickinsonwright.com
5 Phone: (602) 285-5000
Fax: (844) 670-6009

6 Robert S. Ross (#023430)
7 Robert.Ross@tusd1.org
Samuel E. Brown (#027474)
8 Samuel.Brown@tusd1.org
TUCSON UNIFIED SCHOOL DISTRICT
9 **LEGAL DEPARTMENT**
1010 East Tenth Street
10 Tucson, Arizona 85719
Phone: (520) 225-6040
11 *Attorneys for defendant*
Tucson Unified School District No. 1

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

14 Roy and Josie Fisher, et al., 15 Plaintiffs, 16 v. 17 Tucson Unified School District No. 1, et al., 18 Defendants.
19 Maria Mendoza, et al., 20 Plaintiffs, 21 v. 22 Tucson Unified School District No. 1, et al., 23 Defendants.

4:74-cv-0090-DCB
(Lead Case)

4:74-cv-0204 TUC DCB
(Consolidated Case)

24 **EXECUTIVE SUMMARY**
25 **(Orders 2213 and 2217)**
26

1 Pursuant to the Court's orders dated April 10 and 22, 2019 (ECF 2213 and 2217),
2 the District has prepared an executive summary of its equity initiatives and programs
3 under the Unitary Status Plan, attached as Exhibit A. The executive summary is
4 intended to give a broad overview of those efforts, to give an understanding of how they
5 fit together. It does not attempt to address every requirement of the USP or attach
6 extensive exhibits, but does contain citations to the record where a more complete
7 description of particular activities may be found.

8 The executive summary is organized into three parts: (a) improving integration
9 and diversity, (b) improving academic achievement for minority students, and (c) other
10 programs and initiatives. The executive summary contains a table of contents further
11 showing the organizational structure. The placement of a program in one broad part of
12 the executive summary or another is not intended as any limitation on the purpose or
13 impact of that program, but more reflects operational distinctions and relationships.
14 Thus, for example, equity efforts relating to discipline are described in the third part of
15 the summary, though clearly lower and fairer discipline can impact academic
16 achievement, The various programs directly aimed at academic support and
17 achievement tend to be more tightly woven together operationally, and thus are
18 discussed together in the second part. Nonetheless, discipline could easily have been
19 grouped with other discussions in the section devoted to academic achievement. Either
20 way, the substance of the discipline summary is the same.

21 A note on the District's relevant organizational structure may be of assistance at
22 the outset. The Superintendent of the District serves as the District's chief executive
23 officer, who reports to the Governing Board. The District is geographically organized
24 into five regions, each with about 17 schools. An Assistant Superintendent is
25

1 responsible for overseeing the schools in each District. The five Regional Assistant
2 Superintendents report directly to the Superintendent, and are the primary means for
3 implementing policy and programs at the school level, and assessing and holding the
4 principals of the schools in each region accountable for the many tasks and
5 responsibilities that fall to school site staff under the USP. The Regional Assistant
6 Superintendents meet weekly with the Superintendent and other senior leadership, and
7 carry directives and instructions back to the principals in their respective regions.

8 Many of the central district departments most involved in the programs under the
9 USP report to the Assistant Superintendent for Curriculum and Instruction, who also
10 reports directly to, and meets at least weekly with, the Superintendent. These include (in
11 alphabetical order):

- 12 • Advanced Learning Department (with primary responsibility for
13 implementing and overseeing ALE programs under the USP)¹;
- 14 • Assessment and Evaluation Department (testing and student assessments,
15 program assessment and evaluation, and data analyses and decision
16 support for other departments);
- 17 • Culturally Relevant Pedagogy and Instruction Department (development,
18 training and oversight of culturally relevant courses and culturally
19 responsive professional learning);
- 20 • Dropout Prevention and Graduation program, led by

21
22 ¹ University High School, though it is itself considered an advance learning experience, is
23 headed by its principal, who reports to the regional assistant superintendent for its region.
24 The principal of UHS, with assistance from the ALE Department and the student services
25 departments, is responsible for outreach, recruiting, retention and academic success of
prospective and current minority UHS students. The staff at UHS has also worked with
the CRPI

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- Language Acquisition Department (dual language and ELL programs);
- Magnet Department (development and conduct of the Magnet School program, working with the principals of the magnet schools);
- Multicultural Department (development, review and selection of general curriculum to ensure multicultural elements in the entire District curriculum)
- MTSS program led by the Academic and Behavior Supports Coordinator (oversees, tracks, reports and trains the school site MTSS teams);
- New Teacher Department (specialized support and development for first and second year teachers),
- Professional Development Department (coordinating and tracking professional learning for the District, including professional learning content provided by other departments);
- Student Relations Department (managing discipline in the District, ensuring fairness in discipline across racial and ethnic groups, and reducing disciplinary and exclusionary consequences);
- Student Services Departments (AASSD, MASSD and the other student services departments).

School Community Services Department (boundary review, school application processes, lotteries for oversubscribed schools) reports directly to the Superintendent.

The Family and Community Engagement Department (which oversees and provides training for family engagement activities at school sites, runs the four Family Centers, and assists other departments in family and community outreach), for historical and operational familiarity reasons, reports to the Assistant Superintendent for the Santa

1 Cruz Region. Similarly, the Interscholastic Department, which oversees, tracks and
2 reports on extracurricular activities, and works with principals to promote the equitable
3 provision of extracurricular activities, reports to the Assistant Superintendent for the
4 Silverbell Region.

5 The head of the Human Resources Department, responsible for teacher and
6 administrator recruiting, outreach, hiring, development (GYO) programs,² and transfer
7 programs, reports directly to the Superintendent.

8 The Executive Director of the Financial Services Department, responsible for the
9 development and administration of the district budgets for §910G and other sources of
10 funding, reports directly to the Superintendent.

11 The Planning Department (involved in long range district planning, magnet
12 planning, boundary review, desegregation impact analyses for major proposed projects
13 or decisions), the Facilities Department (which maintains, repairs and improves school
14 and other facilities across the District, and maintains, updates and administers the
15 Facilities Condition Index and the Multi-Year Facilities Plan), and the Transportation
16 Department (which designs, routes and operates the Districts student transportation,
17 including magnet and incentive transportation, express shuttles, and activity buses for
18 extracurricular activities) all report to the Chief Operating Officer of the District, who in
19 turn reports to the Superintendent.

20 The Chief Information Officer of the District leads the technology team that
21 provides and supports District EBAS systems, and technology in the classroom. The
22 Instructional Technology Department, which reports to the CIO, provides technology

24 ² Grow your own programs for bilingual teachers are administered by the Language
25 Acquisition Department.

1 professional learning, and assessments of teacher and administrator proficiency in the
2 District's technology resources). The CIO reports directly to the Superintendent.

3 The Communications Department, which assists in developing information,
4 outreach and promotional content for all departments, and manages the District's overall
5 website, parent messaging and other communications with the community, reports
6 directly to the Superintendent.

7 In conclusion, the District has tried very hard to understand what the Court
8 envisioned for the executive summary. If for any reason this executive summary does
9 not meet the Court's needs, the District will promptly add or amend any part of this
10 summary to meet those needs.

11 Dated this 1st day of December, 2019.

12 Respectfully submitted,

13 /s/ P. Bruce Converse

14 P. Bruce Converse

15 Timothy W. Overton

16 **DICKINSON WRIGHT, PLLC**

17 1850 N. Central Avenue, Suite 1400

18 Phoenix, Arizona 85004-4568

19 *Attorneys for Tucson Unified School*
20 *District No. 1*

CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I hereby certify that on the 1st day of December, 2019, I electronically transmitted the attached foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to all CM/ECF registrants.

/s/ P. Bruce Converse