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Attorney for Fisher Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Roy and Josie Fisher, et al.,
Plaintiffs,

and

Maria Mendoza, et al.,
Plaintiffs,

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

Case No. 4:74-CV-00090-DCB
**APPENDIX OF EXHIBITS SUPPORTING
FISHER PLAINTIFFS' CERTIFIED
MOTION TO COMPEL/ORDER
DISCOVERY RE: DATA/
INFORMATION CONCERNING
ACADEMIC ACHIEVEMENT**
[Rules 26 (b)(1) and 37 FRCP]

(Assigned to: *Hon. David C. Bury*)

(Oral Argument Requested)

¶1 COMES NOW *Fisher* Plaintiffs, by and through counsel undersigned, respectfully submitting their Appendix of Exhibits supporting *Fisher* by Defendant TUSD#1. It is noteworthy that each numbered, attached Exhibit corresponds to those referenced in Plaintiffs *Fisher's* Motion to Impose Sanctions for Bad Faith Misconduct contemporaneously filed in the present case.

1. Plaintiffs' Exhibit A, *Frietas* Academic Achievement Report (AzMERIT AfrAm Cohort Study Rept. 8-07-19) with Cover E-mail from TUSD#1 Director of Desegregation (Ms. Martha

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Taylor) to Counsel for *Fisher* Plaintiffs dated 8/28/19

2. Plaintiffs' Exhibit B, 9/5/19 Email from Dr. Gwendolyn Benson w/ attached E-mail and Preliminary Report by Georgia State Research Scientist and Statistician Dr. Robert Hendrick
3. Plaintiffs' Exhibit C, Additional Emails exchanged between Dr. Gwendolyn Benson, Fisher Plaintiffs' Counsel and Georgia State University Research Scientist, Dr. Robert Hendricks dated 9/6/19 and 9/10/19, respectively
4. Plaintiffs' Exhibit D, 9/11/19 E-mail from Research Scientist Dr. Robert Hendricks
5. Plaintiffs' Exhibit E, Exhibit E, Collective or Relevant E-mails as follows: 1) E-mail from TUSD #1 General Counsel Robert Ross providing limited information to Dr. Hendricks dated 9/16/19, 2) Subsequent E-mail from Dr. Hendricks to *Fisher* Plaintiffs' Counsel regarding the limited or inappropriate data received as opposed to the actual data requested, with Dr. Hendricks specifically suggesting that the District's failure to properly disclose the requested information *may be an attempt to hide incriminating data* that actually showed that *the academic achievement gap related to African American Students was actually widening* dated 9/17/19 and 3) Multiple E-mails dated from 9/17/19 through 9/25/19 establishing *Fisher* Plaintiffs' Counsel repeated *good faith* efforts and related requests for necessary discovery of relevant information and disclosure from the District for retained Expert Dr. Hendricks, with the District's ultimate *refusal* to provide the requested information provided by General Counsel Ross
6. Plaintiffs' Exhibit F, E-mail from Superintendent Trujillo to *Fisher* Plaintiffs' Counsel Rubin Salter, Jr., Esq. dated 2/15/20 with attached copy of TUSD #1's Viscount Hotel Power Point Presentation

1 **RESPECTFULLY SUBMITTED** this 2nd day of April 2020.
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3

4 */s/ Rubin Salter, Jr.*
5 RUBIN SALTER, JR., ESQ.
6 ATTORNEY FOR PLAINTIFFS FISHER
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CERTIFICATE OF SERVICE

1
2 I hereby certify that on April 2, 2020, I electronically submitted the foregoing **APPENDIX OF**
3 **EXHIBITS SUPPORTING FISHER PLAINTIFFS' CERTIFIED MOTION TO**
4 **COMPEL/ORDER DISCOVERY RE: DATA REQUESTED BY FISHER PLAINTIFFS**
5 **CONCERNING ACADEMIC ACHIEVMENT** to the Office of the Clerk of the United States
6 District Court for the District of Arizona for filing and transmittal of a Notice of Electronic Filing
7 to the following CM/ECT registrants:

8
9 P. Bruce Converse
10 bconverse@dickinsonwright.com

11
12 Timothy W. Overton
13 toverton@dickinsonwright.com

14
15 Samuel Brown
16 Samuel.brown@tusd1.org

17
18 Robert S. Ross
19 Robert.Ros@tusd1.org

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21 Lois D. Thompson
22 lthompson@proskauer.com

23
24 Jennifer L. Roche
25 jroche@proskauer.com

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27 Juan Rodriguez
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Shaheena.simons@usdoj.gov

Peter Beauchamp
peter.beauchamp@usdoj.gov

Special Master Dr. Willis D. Hawley
wdh@umd.edu

Plaintiffs' Exhibit A

Frietas Academic Achievement Report (AzMERIT AfrAm Cohort Study Rept. 8-07-19) with Cover E-mail from TUSD#1 Director of Desegregation (Ms. Martha Taylor) to Counsel for Fisher Plaintiffs dated 8/28/19

From: Taylor, Martha <Martha.Taylor@tusd1.org>
To: Rubin Salter <rsjr3@aol.com>
Cc: Brown, Samuel <Samuel.Brown@tusd1.org>; Ross, Robert <Robert.Ross@tusd1.org>; Sanchez, Monica <Monica.Sanchez@tusd1.org>
Subject: RFI 2452 re AA Achievement
Date: Wed, Aug 28, 2019 3:49 pm
Attachments: AzMERIT AfrAm Cohort Study Rpt 8-07-19.pdf (815K)

Rubin: Attached is the five-year study from Dr. Freitas on academic achievement, including African American, that Dr. Trujillo referenced at today's meeting.

Best,

Martha

TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

Introduction

This study reviewed longitudinal data on Tucson Unified School District (TUSD) student academic performance on the Arizona Measurement of Educational Readiness to Inform Teaching or AzMERIT, disaggregated by grade-level and by ethnicity. Student performance in AzMERIT English Language Arts (ELA) and Mathematics (Math) was examined for students who were continuously enrolled in TUSD from the 3rd grade through the 7th grade beginning in the SY 2014-2015 and continuing through the SY 2018-2019. This timeframe captures the cohort of TUSD students who were assessed with the first implementation of the 3rd Grade AzMERIT during SY 2014-2015 and follows them over next five school years through the SY 2018-2019. To be included in this longitudinal cohort, students needed 5 years of AzMERIT results in ELA and/or Math.

Comparison of the AzMERIT Percent Proficiency by Grade and Ethnicity

In the SY 2014-2015, 3,743 TUSD students took the 3rd grade AzMERIT ELA exam, of whom 2,062 remained continuously enrolled in TUSD schools over the next five school years and took the AzMERIT each spring. In SY 2014-2015, 3,762 students took the 3rd grade AzMERIT Math exam and 2,086 of those students remained in the school district over this five-year span with AzMERIT scores each year. Please see Appendix 1 for a breakdown of this data by grade and subject. Among this cohort, ELA mean percent proficiency increased from 3rd grade (32.8%) to 4th grade (39.9%), then declined in both 5th (35.2%) and 6th grades (26.0%) and finally improved somewhat in the 7th grade

TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

(29.3%). On the AzMERIT math exam, 3rd grade (34.9%) and 4th grade (34.8%) mean percent proficiency was very similar. In 5th grade, scores increased (41.0%), and then declined in both 6th grade (27.8%) and 7th grades (24.7%). Overall, cohort performances of African-American, Asian/PI-American, Hispanic, Multi-Racial, Native-American and White students conformed to this pattern of improvement in the elementary grades then a decline in the middle school grades in the mean percent proficiency.

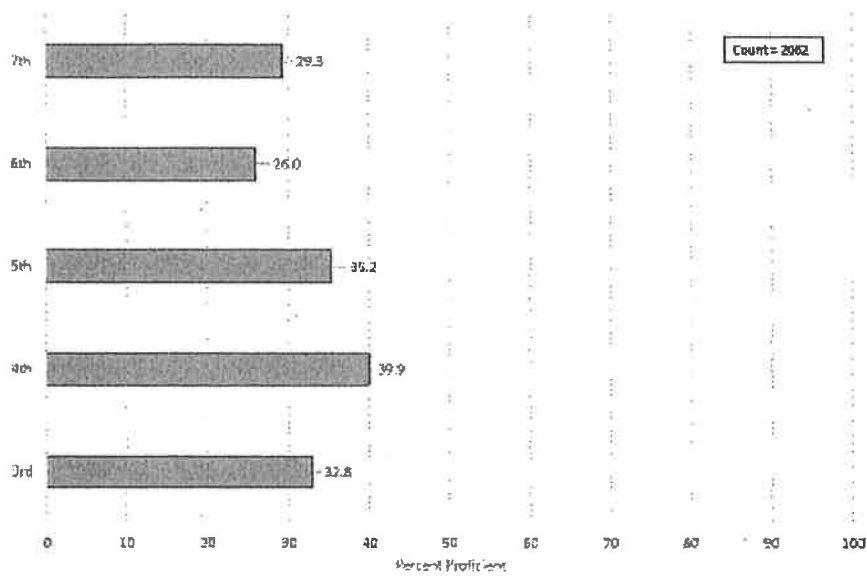
Scale Score Analysis using BOX and WHISKERS

The Box and Whiskers analysis compared ELA and Math AzMERIT performance among this cohort using median scale scores. Please see Appendix 2 for a breakdown of the results by grade and subject. This view illustrates that African-American and Hispanic students performed similarly in their score distributions and median scale scores. Additionally, in the bottom left corner of each grade level, a t-test was conducted to assess if the mean scale scores for each ethnicity was significantly different when compared to White performance within each grade. For all grade-level tests, African-American and Hispanic students' mean scale scores were significantly lower than those of White students. However, this t-test data also revealed an interesting trend across grades when comparing the mean ELA scale scores. African American, Hispanic, and White students all showed very similar changes in the mean scale score year over year for 5 years. The average mean ELA scale score difference over 5 years for African-American was 10.8. Hispanic and White students ELA scale score differences were fundamentally equivalent (11.5 points and 11.8 points respectively) to African American mean ELA scale score differences. In other words, change over time in terms of mean scale scores does not vary much by ethnicity.

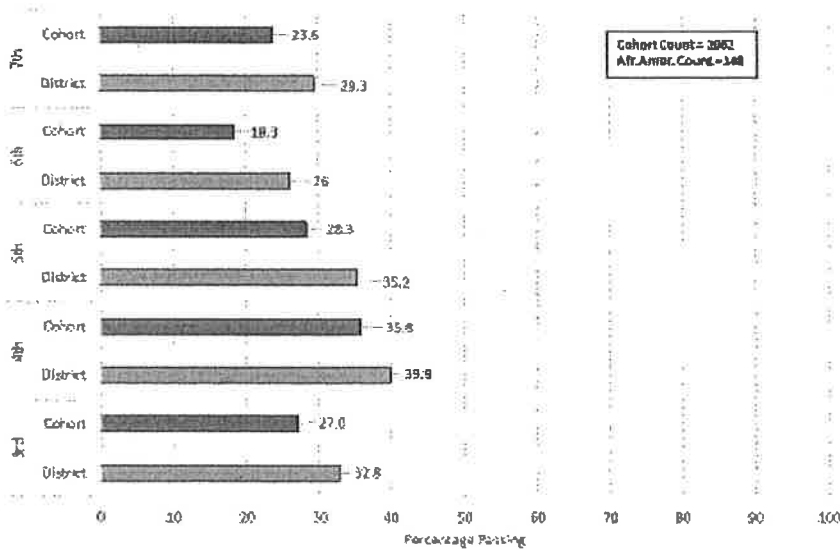
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

Appendix 1

TUSD ELA Performance - Cohort Study

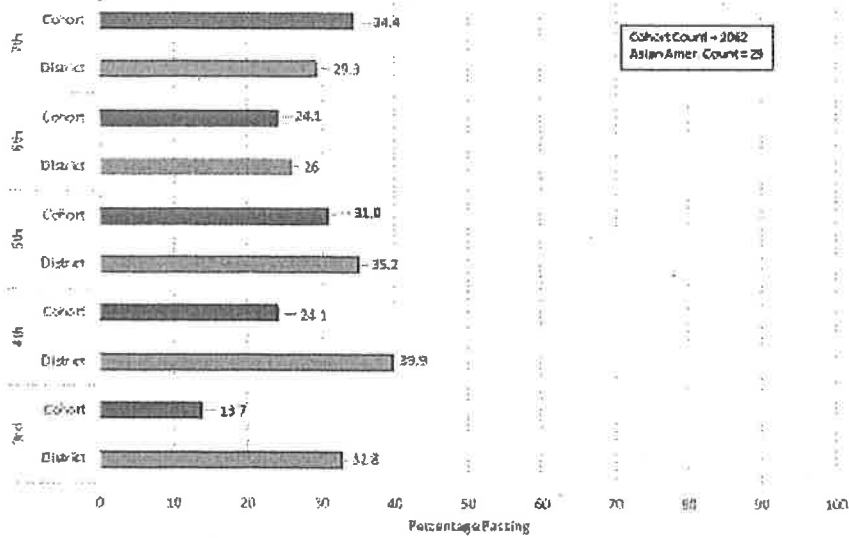


TUSD African American ELA Performance - Cohort Study

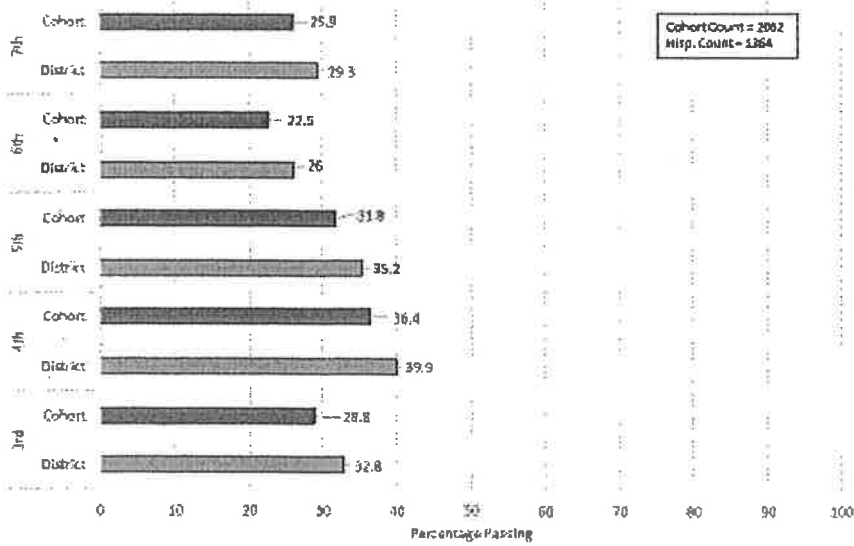


TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD Asian American ELA Performance - Cohort Study

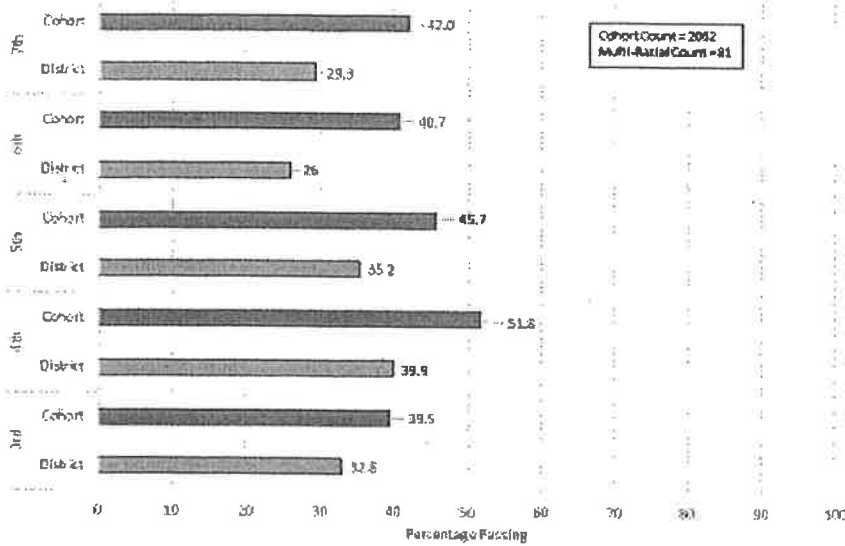


TUSD Hispanic ELA Performance - Cohort Study

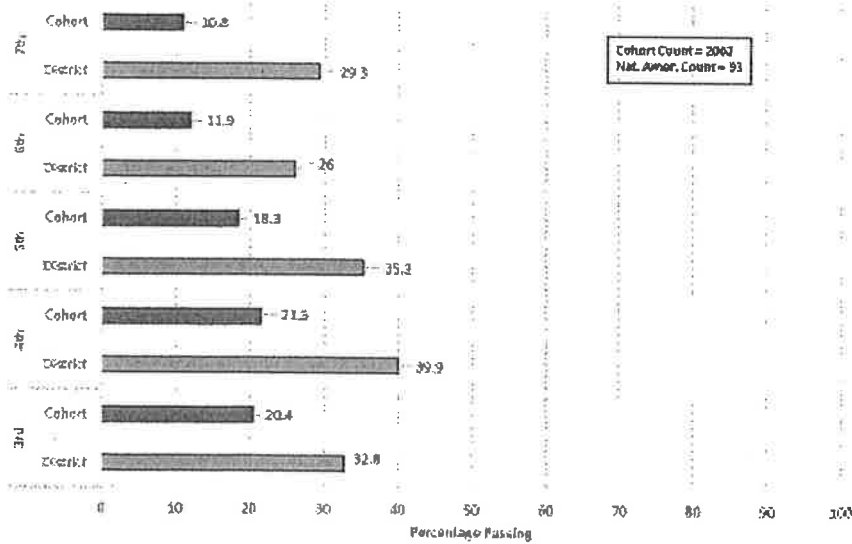


TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD Multi-racial ELA Performance - Cohort Study

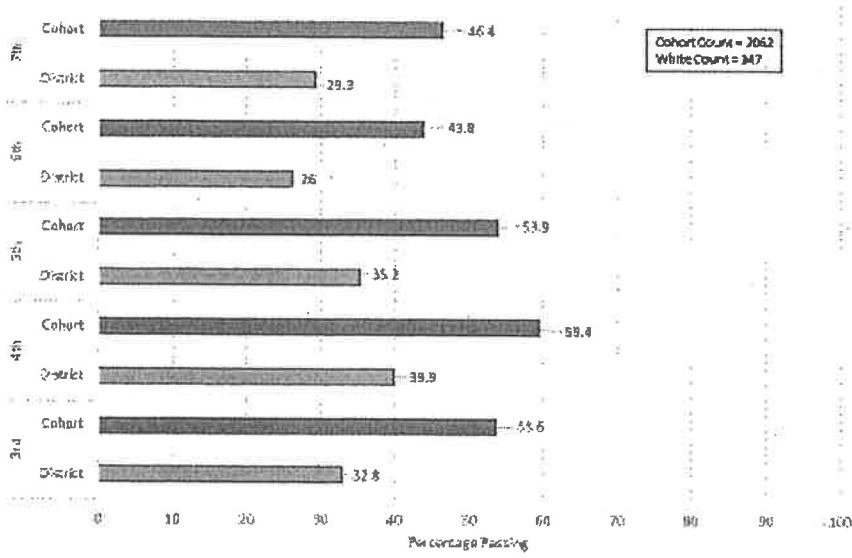


TUSD Native American ELA Performance - Cohort Study

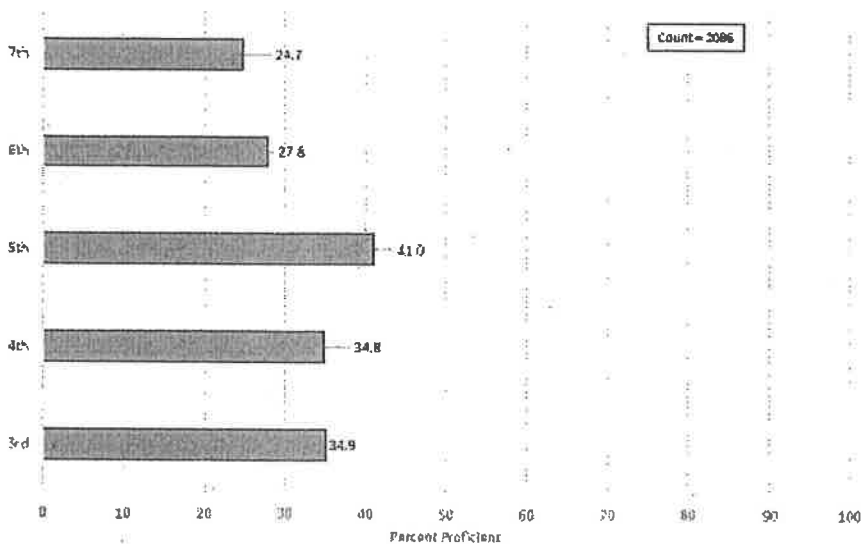


TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD White ELA Performance - Cohort Study

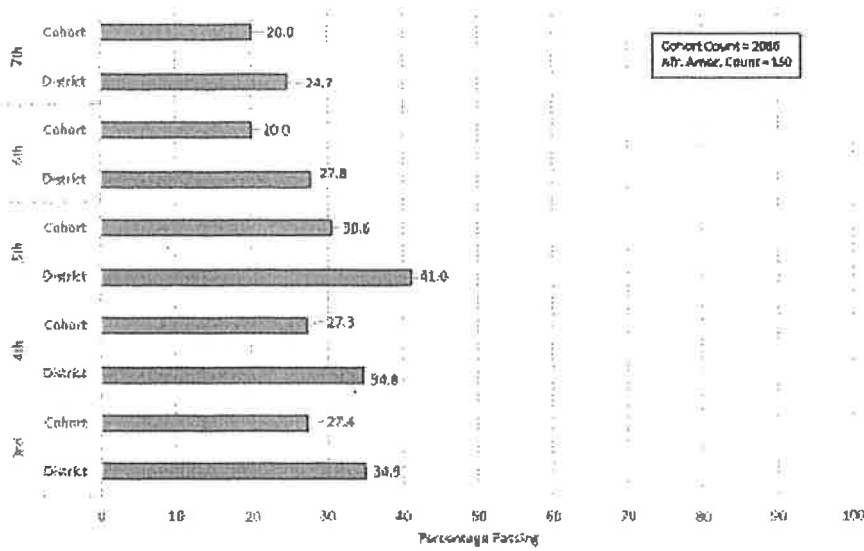


TUSD Math Performance - Cohort Study



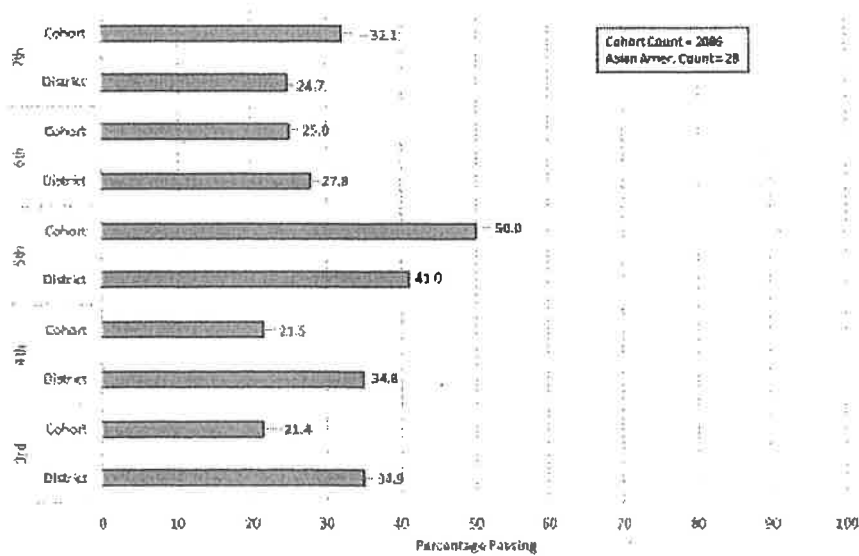
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD African American Math Performance - Cohort Study



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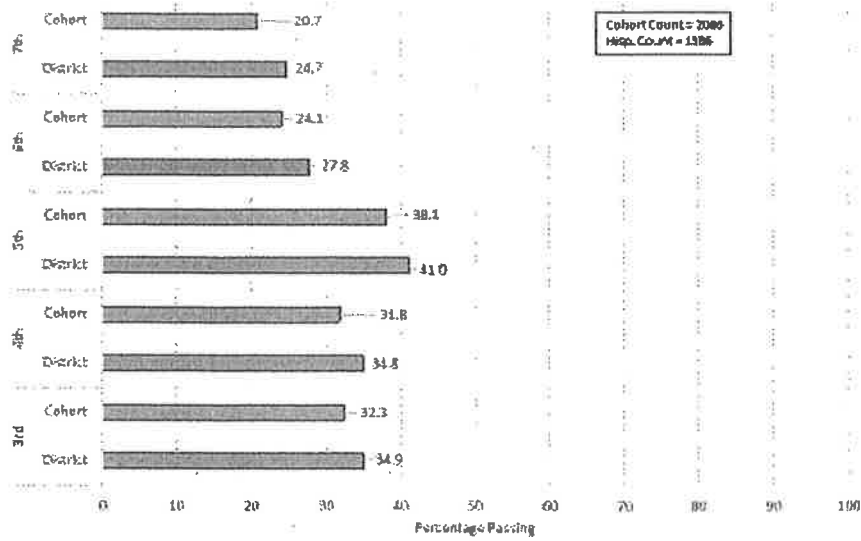
TUSD Asian American Math Performance - Cohort Study



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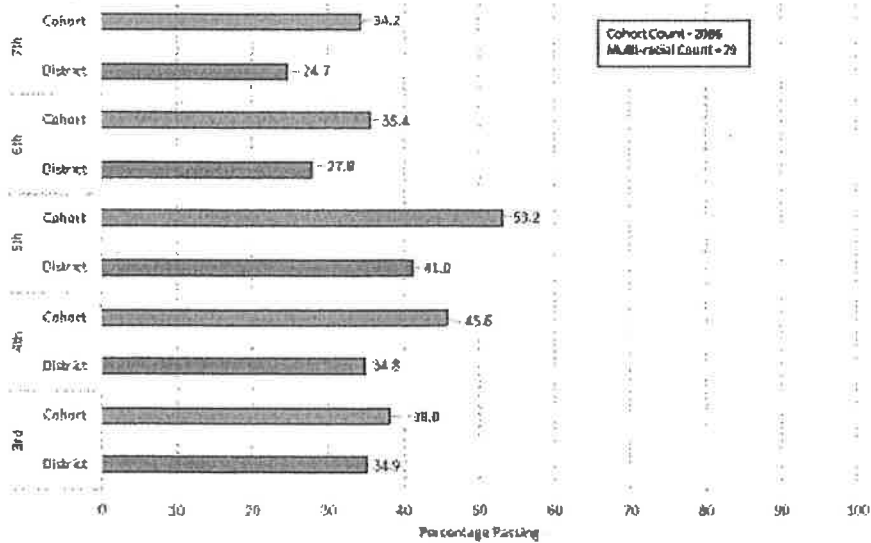
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD Hispanic Math Performance - Cohort Study



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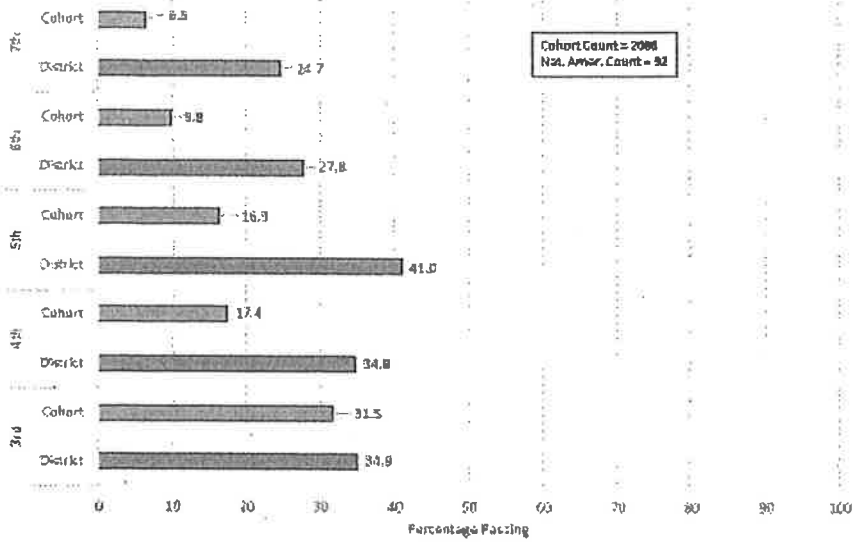
TUSD Multi-racial Math Performance - Cohort Study



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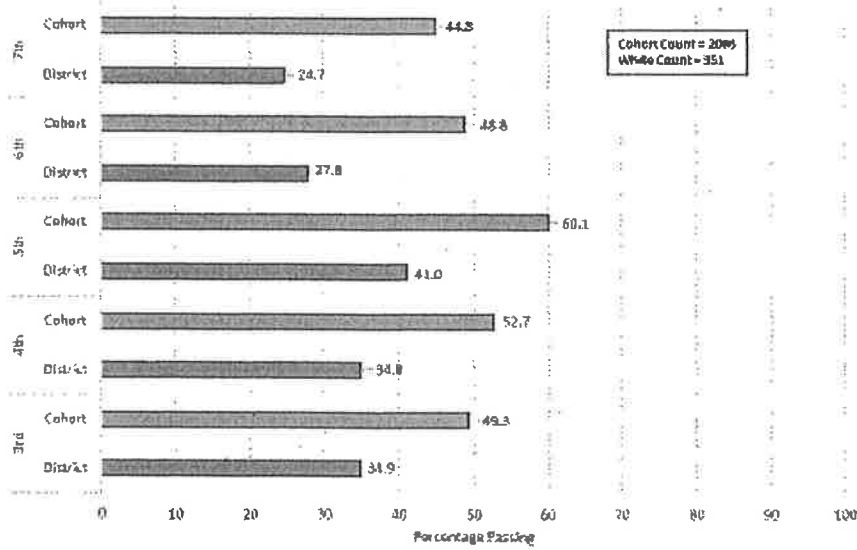
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

TUSD Native American Math Performance - Cohort Study



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TUSD White Math Performance - Cohort Study

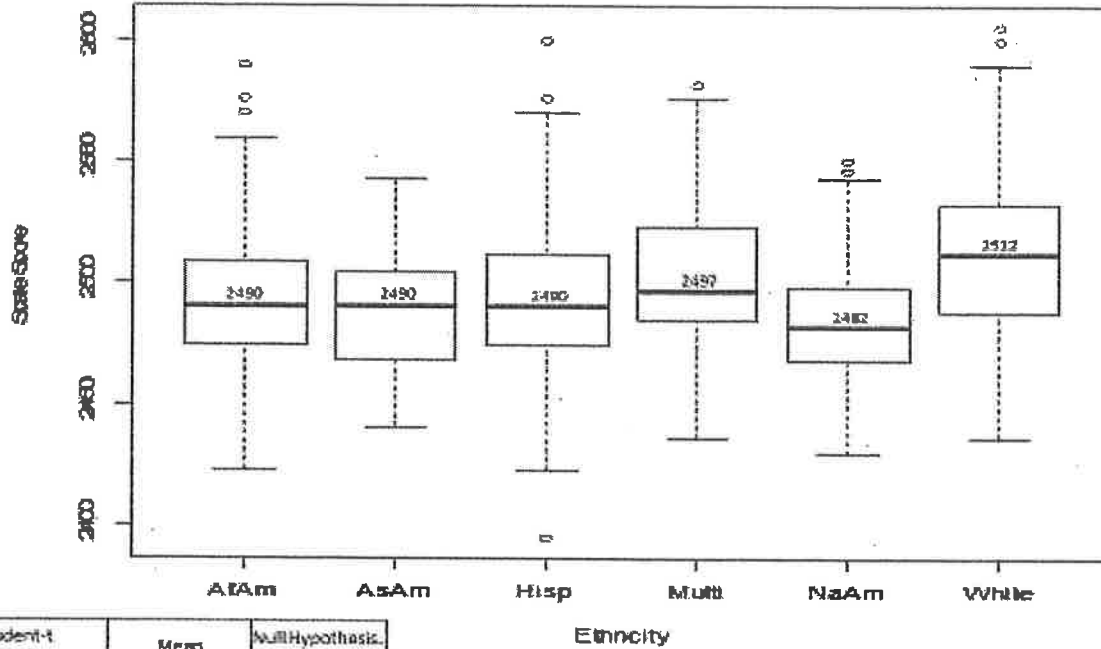


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TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

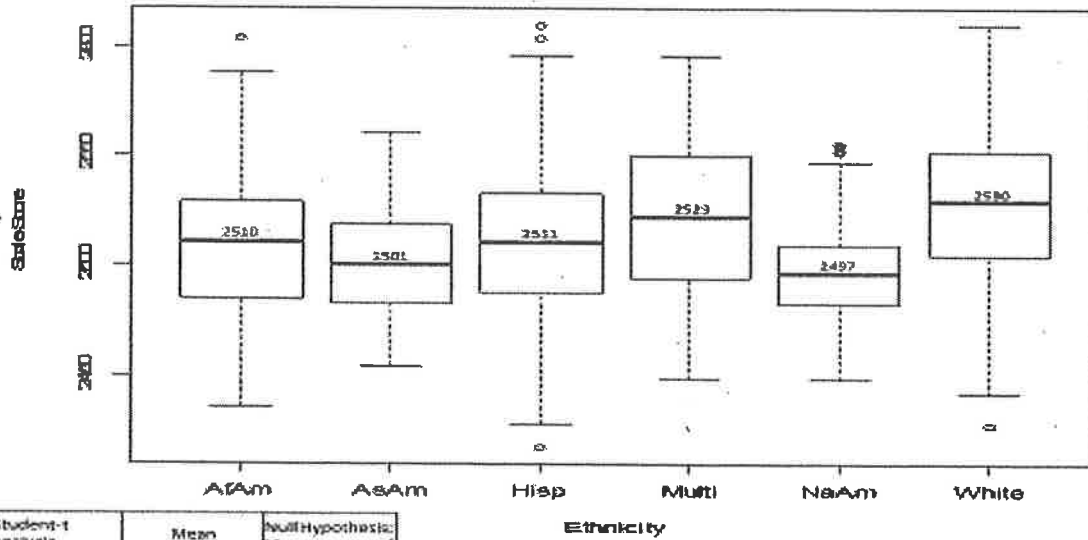
Appendix 2

AzMERIT ELA Results - 3rd Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	2493.5 to 2510.1	Reject
AsAm to White	2483.2 to 2510.0	Reject
Hisp to White	2493.8 to 2510.0	Reject
Multi to White	2504.6 to 2510.0	Can't Reject
NaAm to White	2485.9 to 2510.0	Reject

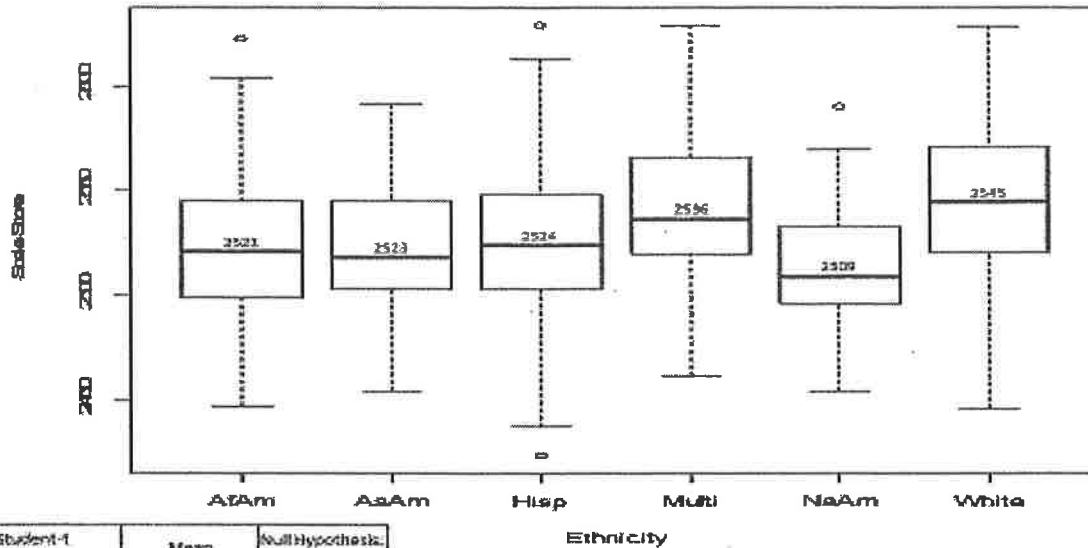
AzMERIT ELA Results - 4th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	2509.5 to 2529.4	Reject
AsAm to White	2501.6 to 2529.4	Reject
Hisp to White	2516.6 to 2529.4	Reject
Multi to White	2524.1 to 2529.4	Can't Reject
NaAm to White	2500.0 to 2529.4	Reject

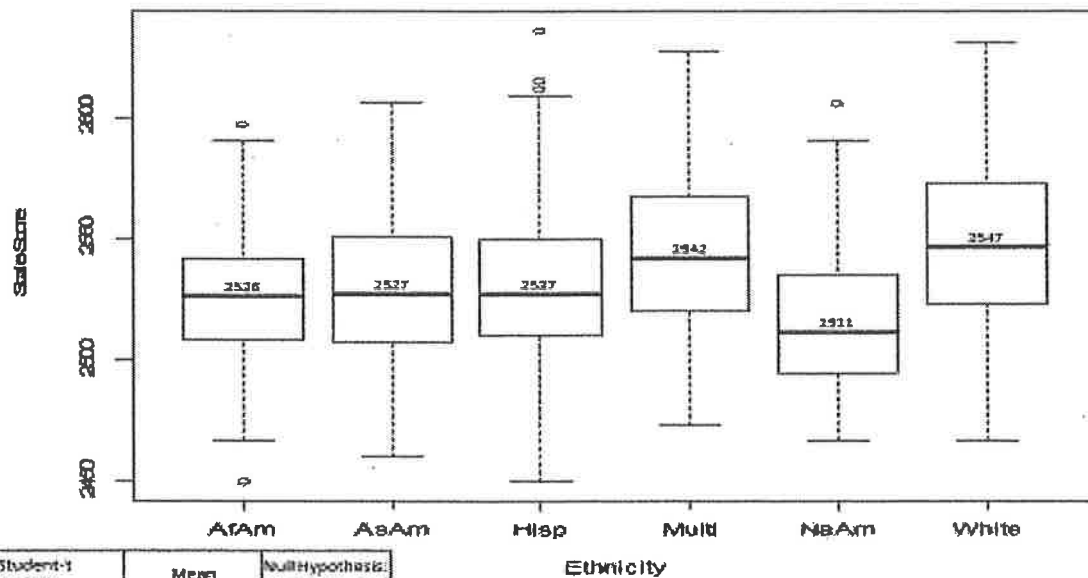
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

AzMERIT ELA Results - 5th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	2523.4 to 2544.8	Reject
AsAm to White	2523.0 to 2544.8	Reject
Hisp to White	2527.1 to 2544.8	Reject
Multi to White	2541.5 to 2544.8	Can't Reject
NaAm to White	2513.7 to 2544.8	Reject

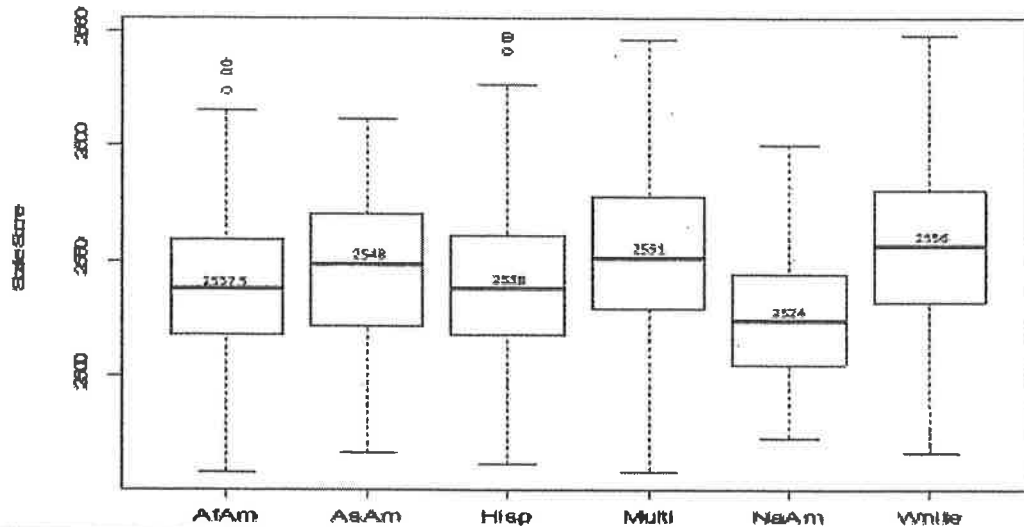
AzMERIT ELA Results - 8th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	2537.2 to 2546.6	Reject
AsAm to White	2530.1 to 2546.6	Reject
Hisp to White	2530.0 to 2546.6	Reject
Multi to White	2544.3 to 2546.6	Can't Reject
NaAm to White	2516.7 to 2546.6	Reject

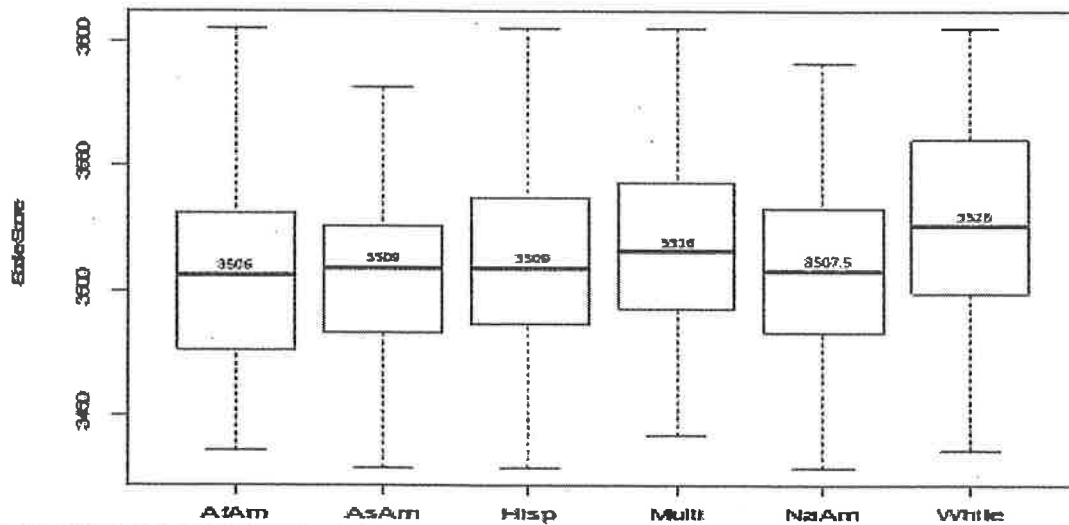
TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

AzMERIT ELA Results - 7th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	2536.5 to 2557.2	Reject
AsAm to White	2546.2 to 2557.2	Can't Reject
Hisp to White	2539.7 to 2557.2	Reject
Multi to White	2552.9 to 2557.2	Can't Reject
NaAm to White	2525.7 to 2557.2	Reject

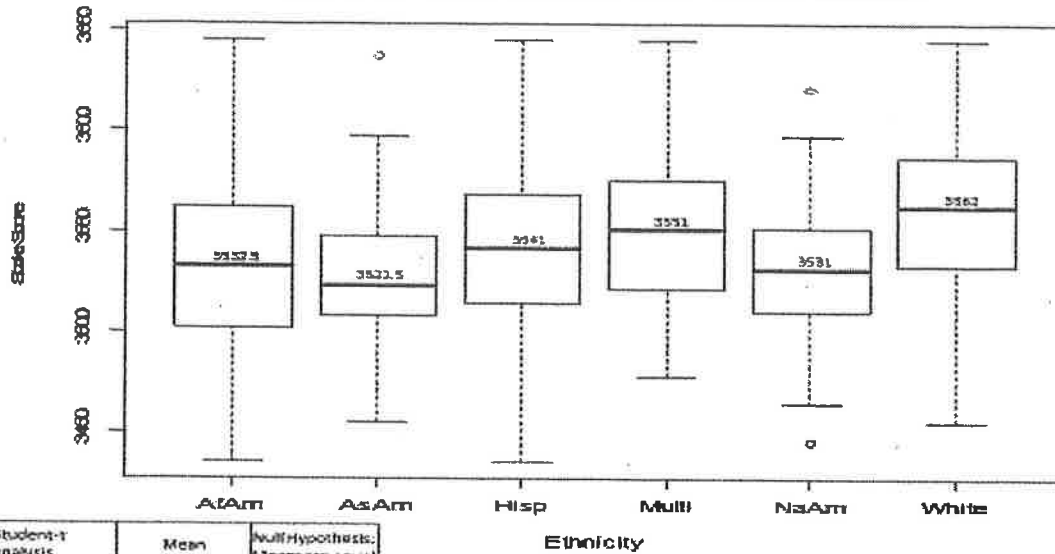
AzMERIT Math Results - 3rd Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	3505.6 to 3529.2	Reject
AsAm to White	3508.1 to 3529.2	Reject
Hisp to White	3512.1 to 3529.2	Reject
Multi to White	3521.8 to 3529.2	Can't Reject
NaAm to White	3508.7 to 3529.2	Reject

TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

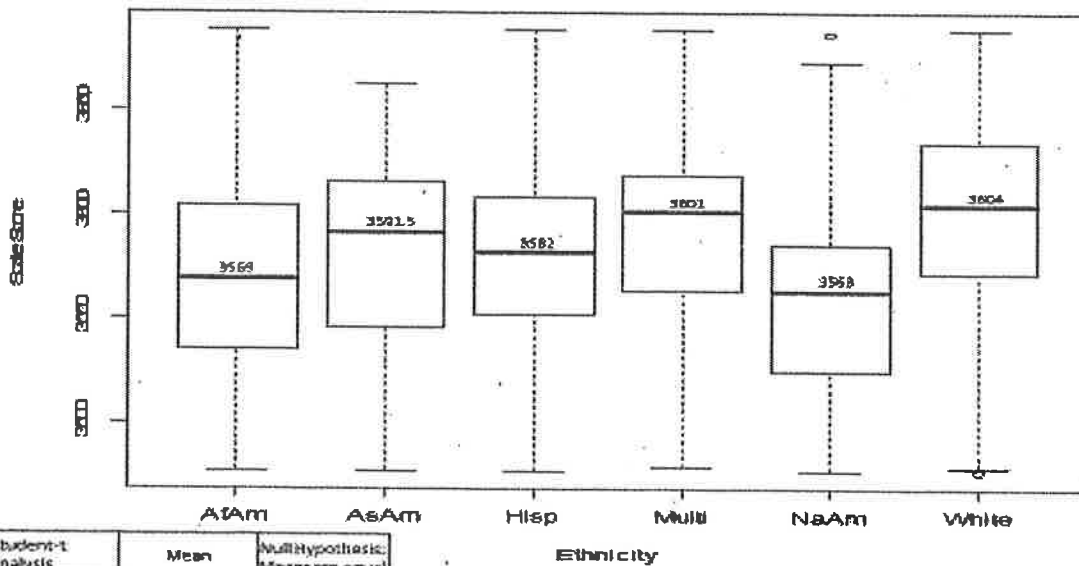
AzMERIT Math Results - 4th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AAm to White	3532.4 to 3559.5	Reject
AsAm to White	3521.1 to 3559.5	Reject
Hisp to White	3540.6 to 3559.5	Reject
Multi to White	3552.8 to 3559.5	Can't Reject
NaAm to White	3529.3 to 3559.5	Reject

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AzMERIT Math Results - 5th Grade Cohort

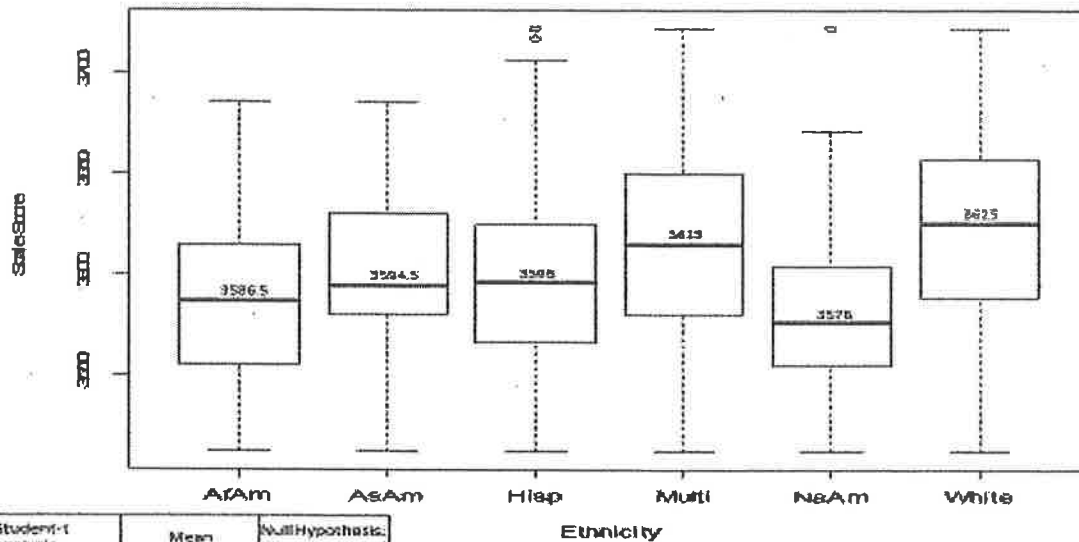


Student-t analysis	Mean	Null Hypothesis: Means are equal
AAm to White	3570.6 to 3601.5	Reject
AsAm to White	3586.0 to 3601.5	Cannot Reject
Hisp to White	3580.0 to 3601.5	Reject
Multi to White	3593.9 to 3601.5	Can't Reject
NaAm to White	3558.1 to 3601.5	Reject

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TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

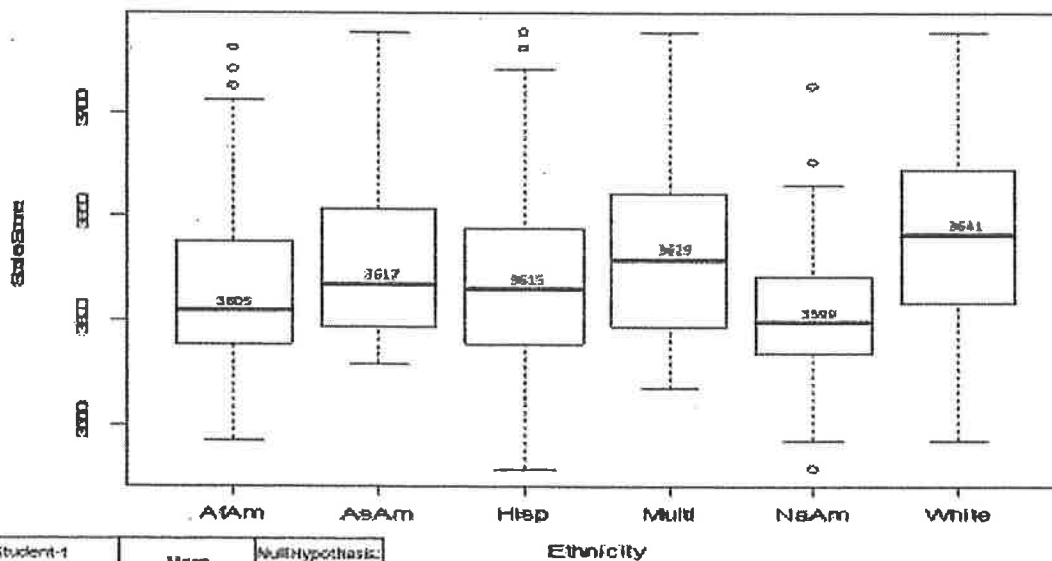
AzMERIT Math Results - 6th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	3589.5 to 3622.1	Reject
AsAm to White	3600.7 to 3622.1	Reject
Hisp to White	3596.3 to 3622.1	Reject
Multi to White	3614.9 to 3622.1	Can't Reject
NaAm to White	3580.1 to 3622.1	Reject

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AzMERIT Math Results - 7th Grade Cohort



Student-t analysis	Mean	Null Hypothesis: Means are equal
AfAm to White	3615.1 to 3643.2	Reject
AsAm to White	3629.1 to 3643.2	Cannot Reject
Hisp to White	3618.3 to 3643.2	Reject
Multi to White	3633.7 to 3643.2	Can't Reject
NaAm to White	3603.7 to 3643.2	Reject

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TUSD COHORT STUDY OVER 5 YEARS USING AZMERIT SCORES 2014-15 TO 2018-19 BROKEN OUT BY ETHNICITY

When African-American and Hispanic students' math scale scores were compared against White students, African-American and Hispanic students' mean scale scores were also statistically lower than White students across all grade-levels. Similar to the trends that were evident with ELA scores, math scale score change over time was equivalent across ethnicities. African-American (27.1 points) and Hispanic (26.6 points) students average yearly change over 5 years in math scale scores were comparable to that of White students (28.5 points).

Summary

In summary, by 3rd grade, an academic gap already exists in percent proficiency between African American and Hispanic students when compared to White students. The gap that was evident in 3rd grade between African-American and Hispanic students when compared to White students persisted to the 7th grade in both ELA & Math. In both subjects, each ethnicity show the same trend of overall increases in elementary school followed by decreases in middle school in percent proficiency. The Box and Whiskers analysis of AzMERIT scale scores in ELA & Math demonstrates that African-American and Hispanic students' performance is statistically significantly lower than White students across all grade-levels. However, the annual yearly change in mean scale scores of African-American and Hispanic students is comparable to White students in both ELA & Math. Additionally, it appears that the gap did not dramatically increase or decrease because the mean scale score changes year over year between the different ethnicities were fundamentally equivalent.

Plaintiffs' Exhibit B

***9/5/19 Email from Dr. Gwendolyn Benson
w/ attached E-mail and Preliminary Report
by Georgia State Research Scientist and Statistician
Dr. Robert Hendrick***

From: Gwendolyn T. Benson <gbenson@gsu.edu>
To: rsjr3@aol.com <rsjr3@aol.com>
Subject: Fwd: TUSD
Date: Thu, Sep 5, 2019 3:28 pm
Attachments: Rubin Report 2019.docx (43K), ATT00001.htm (189)

Hi Attorney Salter,
Please confirm receipt of this email.

Best,
Gwen

Sent from my iPhone

Begin forwarded message:

From: Robert Clayton Hendrick <rhendrick1@gsu.edu>
Date: September 5, 2019 at 4:21:42 PM CDT
To: "Gwendolyn T. Benson" <gbenson@gsu.edu>
Cc: Susan Lipford Ogletree <sogletree1@gsu.edu>
Subject: TUSD

Dr. Benson,

I have examined the report from Dr. Fritas and the methods used to arrive at the conclusions. I have prepared a brief response that may help Rubin to explain the current report (attached).

I would be willing to re-analyze those data for a report. The data that I would need are all students from 2012-13 school year through 2018-19 school year. In that manner, I can examine trends over 7 school years and the AzMerit results (if available) for that cohort. In getting all of the student data I would need specifically:

School Year

Grade Level

Student unique identifier – (State number)

Gender

Race/Ethnicity

SES indicator – Could be eligibility for Free or Reduced Lunch

AzMERIT ELA scaled score

AzMERIT Math scaled score

I would need these data for all students in grades 3 during 2012-13; 4 during 2013-14; 5 during 2014-15, 6 during 2015-16; 7 during 2016-17; 8 during 2017-18; and 9 during 2018-19. In that way I could examine a cohort over 7 years including 3 years of elementary and 3 years of middle school. The 9th grade information would be an outcome for the middle school.

Please examine this report and let me know if a more extensive report is needed,

Regards,

Robert

Robert Hendrick, Ph.D.

Research Scientist

Center for Evaluation and Research Services (CERS)

CEHD 468, Georgia State University

404-413-8267

rhendrick1@gsu.edu

Initial findings regarding the racial achievement gap between White, African-American, and Hispanic students reported by the TUSD in 2019. (Dr. R.C. Hendrick, Georgia State University)

This communication is for Dr. Gwendolyn Benson in response to reviewing a report by Dr. Freitas on academic achievement referenced by Dr. Trujillo. The data provided indicated the mean scores of a cohort of students over a five-year period from school year 2014-15 to school year 2018-19 by the ELA and Math AzMERIT scale score means for each represented racial/ethnic group. The study indicates a statistically significant achievement gap between the mean scale scores of African-American students and White students in each grade. This finding is confirmed by this review of the means and statistics shown in the report. I can also confirm that there is a statistically significant gap between the mean scale scores of Hispanic students and White students in each grade. The study is well conceived and includes those students with AzMERIT scores in ELA and Math in all 5 school years within the longitudinal research controlling for factors that may be introduced by student moving into TUSD during the 5-year period.

I have reconstructed the analysis from the published means and without a re-examination of those data, I can affirm the accuracy of the means and the statistical significance of the overall academic gap in ELA and Math between African-American, Hispanic, and White students.

Regarding the finding cited in the summary of the report,

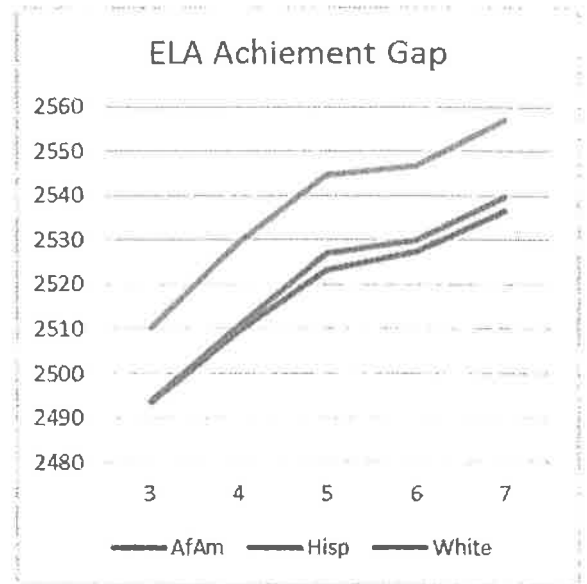
...the annual yearly change in mean scale scores of African-American and Hispanic students is comparable to White students in both ELA & Math. Additionally, it appears that the gap did not dramatically increase or decrease because the mean scale score changes year over year between the different ethnicities were fundamentally equivalent. (Fritas, 2019 pg. 14)

The accuracy of the mean scale score change is correct according to the yearly means published in the report. However, the conclusion of the gap remaining fundamentally equivalent is not indicated by your published scale score means. For example, the ELA AzMERTIT scale score means reflected by the report are as follows:

Grade	ELA AzMERIT		
	AfAm	Hisp	White
3	2493.5	2493.8	2510.2
4	2509.5	2510.6	2529.4
5	2523.4	2527.1	2544.8
6	2527.2	2530	2546.6
7	2536.5	2539.7	2557.2

In order to identify and quantify the academic gap we can examine these data using a comparative line graph:

In the line graph, we can clearly see the trend across the 5 years of ELA scale score means. In grade 3 the achievement gap between scale score means for African-American students compared to White students is 16.7 points (2510.2 – 2493.5). Moreover, we can see that the gap indicates about a year of growth in the scale score mean because the African-American mean in the 4th grade is roughly similar to the White mean in the 3rd grade. Thus, the African-American students academically on average start the 3rd grade about 1 year behind the average White student according to your calculated mean scores. By the 4th grade the ELA achievement gap grows to 19.9 scale score points between these same groups and that gap grows again to 21.4 points in the 5th grade. This is not a great difference when the average gains are evaluated using statistical measures; however, by the 5th grade the White students ELA mean score gap has increased to more than 2 academic years of growth. While the 5th grade mean scaled score for White students is 2544.8, the 7th grade mean school for African-American students is 2536.5. Which indicates the initial gap of roughly one year in grade three has doubled by grade five. Using the ELA mean scale scores published in your report, the gaps between African-American and White performance on the AzMERIT was 16.7 points in grade three, 19.9 points in grade four, and 21.4 points in grade 5. These numbers indicate a widening of the achievement gap during the elementary grades. This gap is reframed in the context of the middle school and starts again at 19.4 points in grade six and 20.7 points in grade 7. Overall, the gap is statistically significant and growing within the elementary school level and middle school shows some indication of resetting the academic responses and increasing the gap, but has limited data to indicate a trend.



While the 5th grade mean scaled score for White students is 2544.8, the 7th grade mean school for African-American students is 2536.5. Which indicates the initial gap of roughly one year in grade three has doubled by grade five. Using the ELA mean scale scores published in your report, the gaps between African-American and White performance on the AzMERIT was 16.7 points in grade three, 19.9 points in grade four, and 21.4 points in grade 5. These numbers indicate a widening of the achievement gap during the elementary grades. This gap is reframed in the context of the middle school and starts again at 19.4 points in grade six and 20.7 points in grade 7. Overall, the gap is statistically significant and growing within the elementary school level and middle school shows some indication of resetting the academic responses and increasing the gap, but has limited data to indicate a trend.

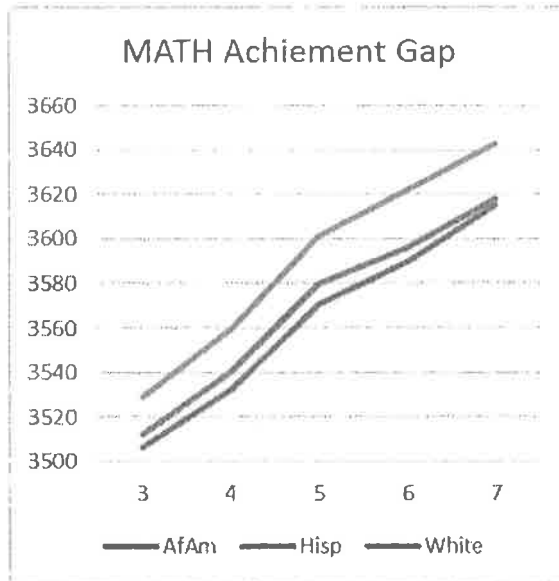
The findings are similar for Math AzMERIT mean scale scores; these are as follows:

Grade	Math AzMERIT		
	AfAm	Hisp	White
3	3506.6	3512.1	3529.2
4	3532.4	3540.6	3559.5
5	3570.6	3580	3601.5
6	3589.5	3596.3	3622.1
7	3615.1	3618.3	3643.2

In order to identify and quantify the academic gap we will examine these data using a comparative line graph:

In the line graph, we can see the trend across the 5 years of Math scale score means. In grade 3 the achievement gap between scale score means for African-American students compared to White students is 22.6 points (3529.2-3506.6). Moreover, we can see that the gap indicates less than a year of growth in the scale score mean because the African-American mean in the 4th grade is slightly higher than the White mean in the 3rd grade. Thus, the African-American

students academically on average start the 3rd grade less than 1 year behind the average White student according to your calculated mean scores. By the 4th grade the Math achievement gap grows to 27.1 scale score points between these same groups and that gap grows again to 30.9 points in the 5th grade. This is not a great difference when the average gains are evaluated using statistical measures; however, by the 5th grade the White students Math mean score gap has increased to more than 1.5 academic years of growth. While the 5th grade mean scaled score for White students is 3601.5, the 7th grade mean school for



African-American students is 3615.1. Which indicates the initial gap of less than one year in grade three has increased to 1.5 years by grade five. Looking at the graph you can see that the mean Scale score for whites in grade five is approached by the mean African-American mean scaled score about half-way through grade 6. Using the Math mean scale scores published in your report, the gaps between African-American and White performance on the AzMERIT was 22.6 points in grade three, 27.1 points in grade four, and 30.9 points in grade 5. These numbers indicate a widening of the achievement gap during the elementary grades. This gap is reframed in the context of the middle school and starts again at 32.6 points in grade six and then decreases to 28.1 points in grade 7. Overall, the gap is statistically significant and growing within the elementary school level. The academic gap in Math does show some tendency to decrease given the limited data points in middle grades. More data would provide additional information about any middle school trend.

In summary, the report for TUSD is accurate regarding the identification of a statistically significant achievement gap across the five years for both ELA and Math as shown by the AzMERIT mean scale scores. However, this analysis does not agree that the gap remains the same across grades. The mean scale scores from this report were used to create these comparative line graphs, which show the increase in the gap. An academic gap is not best described using average mean gain scores as the process regresses the measurement toward the mean across the five-year period and does not examine the year-to-year impact of the academic gap. Using these data from the report in a year-by-year comparative line graph identifies the magnitude of the gap and displays the accumulative nature of the African-American educational deficits year by year.

Plaintiffs' Exhibit C

Additional Emails exchanged between Dr. Gwendolyn Benson, Fisher Plaintiffs' Counsel and Georgia State University Research Scientist, Dr. Robert Hendricks dated 9/6/19 and 9/10/19

From: Gwendolyn T. Benson <gbenson@gsu.edu>

To: Robert Clayton Hendrick <rhendrick1@gsu.edu>; rsjr3@aol.com <rsjr3@aol.com>

Subject: Introduction

Date: Fri, Sep 6, 2019 4:05 pm

Dear Dr. Hendrick and Attorney Salter, I would like to take this opportunity to introduce the two of you.

Robert, thank you for taking the time to review the information I sent regarding student learning in the Tucson School District. Your expertise in this area will contribute to efforts to continue the focus on closing the achievement gap between African American and white students.

I know that this will be a great partnership!

Dr. B

Sent from my iPhone

I would like to inquire about retaining your services to write a more extensive report on the racial achievement gap between White, and African-American students reported by the TUSD in 2019.

As far the data you would need to perform the analysis, a "Joint Information Sharing Agreement" has been proposed so that you may obtain all of the requested data that you would be using in a more extensive report. It has been suggested that you contact Dr. Frias to work out the details of the agreement. We will provide her contact information and will her advise her that she should expect you to reach out to her to finalize the agreement. Once the agreement is entered into the district will release the agreed to data that you would need to write your report and in the negotiated format.

Time is of the essence, I would need a final report by the 17th of September. I apologize for the tight window. I must file a response by September 20th on behalf of my clients.

Of course, I expect to pay you for your expertise. If you can let me know an estimate for your work and provide a CV it would be appreciated.

Thank you and I look forward to working with you.

Rubin.

Rubin Salter, Jr.
Attorney
The Law Office of Rubin Salter, Jr.
177 N. Church Avenue

Suite 903
Tucson, AZ 85701

(520) 623-5706

(520) 623-1716 fax
rsjr3@aol.com

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From: Robert Clayton Hendrick <rhendrick1@gsu.edu>
To: Rubin Salter <rsjr3@aol.com>
Cc: Holidays in United States <salterlawoffice@gmail.com>
Subject: RE: TUSD
Date: Tue, Sep 10, 2019 6:51 am
Attachments: Hendrick VITAV 8-5-2019.docx (19K)

Rubin,

The window to complete the report is very tight, but I think it can be done depending on the speed in which these data become available from Dr. Frias. I would be glad to contact her regarding the agreement and the data request. Though my schedule is fairly crowded, I can prioritize this report for delivery by 9/17 pending obtaining the data in a timely manner. I estimate the cleaning and analysis of the data would take two days and the writing of the report two days. My typical daily rate is \$1200 per day (\$150 per hour), so for cleaning and analysis of the data and preparing the report, an estimate is \$4800.

My CV is attached.

Let me know if you would like to proceed and forward Dr. Frias contact information.

Regards,

Robert

Robert Hendrick, Ph.D.

Research Scientist

Center for Evaluation and Research Services (CERS)

CEHD 468, Georgia State University

404-413-8267

rhendrick1@gsu.edu

From: Rubin Salter <rsjr3@aol.com>
Sent: Monday, September 9, 2019 10:29 PM
To: Robert Clayton Hendrick <rhendrick1@gsu.edu>
Cc: Holidays in United States <salterlawoffice@gmail.com>
Subject: TUSD

Dr. Hedrick,

I am in receipt of the below e-mail from Dr. Benson containing your response to Dr. Frias report. I am grateful for the connection having been made.

CURRICULUM VITAE

Robert Clayton Hendrick

EDUCATION

- Ph.D. 2014 Georgia State University
Educational Policy Studies, Research, Measurement, and Statistics
- Ed.D 1996 University of Georgia
Educational Leadership (ABD)
- M.S. 1991 University of West Georgia
Educational Leadership (Add-on)
- M.S. 1986 University of West Georgia
Middle Grades Mathematics
- B.S. 1984 University of West Georgia
Middle Grades Education

PROFESSIONAL EXPERIENCE

2010-Present Research Scientist

Georgia State University, Atlanta, GA

Director of Evaluation for Gear-Up Jefferson County, Alabama. A seven-year \$25 M program to identify and minimize the educational deficits for marginalized 6th and 7th grade students within the Jefferson County area. The program involves 13 schools in 5 districts with about 5000 students.

Designs, collects data, and performs analysis with the Technical College System of Georgia within a partnership IES grant to diagnose and provide improvement data for more than 300 Adult Basic Education sites in the State.

External evaluator of Georgia 21st century of 4 Afterschool programs in Douglas County, GA for a total of 14 Afterschool sites since 2011.

Implemented, administered, and maintained an extensive online survey instrument given to more than 3000 certified personnel in 53 Georgia K-12 schools. Work with Superintendents, Principals, Teachers, and University faculty and staff to evaluate \$13M NET-Q Project funded by the Teacher Quality Partnership (TQP) a division of the U. S. Department of Education.

Maintained an extensive online survey instrument and helped to develop a meta-analysis technique to evaluation student performance within the CREST-Ed grant, which partners with Superintendents, Principals, Teachers, and University faculty and staff to evaluate PDS implementation. CREST-Ed is a \$7.3M Project funded by the Teacher Quality Partnership (TQP) a division of the U. S. Department of Education.

2008-2010 Mathematics Teacher, South Cobb High School

Cobb County School System, Marietta, GA

Developed and disseminated instructional technology for high school math classrooms. Specialized in teaching students who find mathematics challenging and come from minority populations.

2002-2008 Manager of Atlanta Office and Director of Instructional Design, PLATO Learning, Inc., Atlanta, GA

Supervised 73 employees, Specialist in instructional design for mathematics, Managed business unit grossing \$1.2M annually.

1998-2002 Executive Director of Implementation Services NETSchools Corporation, Atlanta, GA

Worked with school system leaders nationally and internationally to implement wireless technology for instructional purposes. One of the principal writers for and received \$12M Wireless Classroom Grant for Georgia. Administered the Wireless Classroom Project from 2000 to 2002.

1992-1998 Assistant Superintendent of Schools Carrollton City School System, Carrollton, GA

Presented to international conferences in San Jose, CA, Denver, CO, Sydney, AU, and Singapore. Provided Instructional technology consulting to school systems in 34 US states, and 14 foreign countries. Tested and evaluated emerging technologies for EBSCO, UMI, IBM, and other industries. Developed and administered the first instructional network that provided a total school system network for all classrooms. Received over \$5M in state and corporate grants.

1989-1992 Assistant Principal Carrollton Junior High School Carrollton City School System, Carrollton, GA

Developed and administered a computerized report card system, scheduling system, and helped to develop a standards-based curriculum and accountability system.

PROFESSIONAL SOCIETIES AND ORGANIZATIONS

2014-Present American Evaluation Association

2012-Present National Council on Measurement in Education

2010-Present Nation Association of Professional Development Schools

2010-Present American Educational Research Association

PRESENTATION AND PUBLICATIONS

Benson, G., Curlette, W., Ogletree, S., Hendrick, R. (2018). Using clinical teaching to increase student achievement in high-needs, urban, partnership schools. *School-University Partnerships (NAPDS Special Issue: Teacher Inquiry in Professional Development Schools: How it Makes a Difference)*.

- Benson, G., Hendrick, R., McIntyre, Q., & Ogletree, S. (2017, March 10). Crest-Ed Menu of Services: An Innovative Response to PDS Partner District Identified Needs. Presentation at the National Association for Professional Development Schools 2017 Conference, Washington D.C.
- Hendrick, R. C. & Ogletree, S. L. (2017, January 31). Meta-Analysis: Connecting Clinical Teaching with Student Achievement in High-Needs Urban Partnerships. Presentation at the 1st Annual Conference on Academic Research in Education, Las Vegas, NV.
- Ogletree, S. & Hendrick, R. (2016, September 11). Seeking grant funding for Adlerian based projects. Invited Presentation at the North American Society of Adlerian Psychology. Adlerian Research Conference, Atlanta, GA.
- Benson, G., Ogletree, S. & Hendrick R. (2016, August 13-17). Invited American grant writing workshop. North West University, Potchefstroom, SA.
- Granville, H., Curlette, W., Hendrick, R., Ogletree S. & Benson, G. (2016, April 9). Enculturating for Belonging-Social Interest within professional development schools: the real work in critical friends groups. Presentation at the annual conference of the American Education Research Association, Washington, D.C.
- Hendrick, R., Curlette, W., Benson, G., Ogletree, S., Granville, H., McIntyre, Q. (2016, March 4). Assessing Pre-service Teachers Based on k-12 Student Academic Achievement Performance: Using Meta-Analysis. Presentation at the annual conference of National Association of Professional Development Schools, Washington, D.C.
- Granville, H., Curlette, W., Hendrick, R., Benson, G., Ogletree, S., & McIntyre, Q. (2016, March 4). Enculturating for Belonging-Social Interest in PDSs: A Fresh Perspective on Critical Friends Groups and School Culture. Presentation at the annual conference of National Association of Professional Development Schools, Washington, D.C.
- Hendrick, R., Thompson, W. (2016). Reading research 101. *ACSM's Health and Fitness Journal*, 20(1), 9-13.
- Curlette, W., Hendrick, R., Ogletree, S., Benson, G., & Granville, H. (2015, April 19). Assessing Student Achievement in Professional Development Classrooms: Inviting Contributions to Cumulative Meta-Analysis. Paper presented at the annual meeting of the American Educational Research Association, Atlanta, GA.
- Granville, H., Curlette, W., Hendrick, R., Ogletree, S., & Benson, G. (2015, March). Fostering educational equity in PDSs through enculturating belonging/social interest. Presentation at the annual meeting of the National Association of Professional Development Schools, Atlanta, GA
- Hendrick, R., Curlette, W., Ogletree, S., & Benson, G. (2014, March 29). Linking teacher preparation to increased student achievement in high-needs, professional development classrooms. Paper presented at March 2014 National Professional Development Schools Conference, Las Vegas, NV.
- Curlette, W. L., Hendrick, R. C., Ogletree, S. L., Benson, G. T. (2014) Student achievement from anchor action research studies in high-needs, urban professional development schools. In *Creating visions for university school partnerships*. Information Age Publishing.

- Curlette, W. L., Hendrick, R. C. (2014) Advocating for the use of social networks in individual psychology. *The Journal of Individual Psychology*
- Hendrick, R. C., Curlette, W. L., Ogletree, S. L., Benson, G. T. (2013, April). *Meta-analysis: New findings connect clinical teaching with evaluating student achievement in high-needs, urban, partnership schools*, paper presented at the 2013 AERA Annual Meeting, San Francisco, CA.
- Curlette, W. L., Hendrick, R. C., & Granville, H. G. (2013, April). *Anchor action research as an aspect of clinical teaching*, poster session presented at the 2013 AERA Annual Meeting, San Francisco, CA.
- Hendrick, R. C., Curlette, W. L., Ogletree, S. L., Benson, G. T., Martin, C., Grier, C., & Veazie, W. (2013, February). *Clinical teaching and evaluating student achievement in high-needs, professional development classrooms*, Paper presented at the 2013 Professional Development Schools National Conference, New Orleans, LA.
- Curlette, W. L., Hendrick, R. C., Ogletree, S. L., Benson, G. T., & Granville, H. G. (2012, April). *Empirical support for fidelity of implementation based on NCATE PDS standards: A new online instrument*, Roundtable session presented at the 2012 AERA Annual Meeting, Vancouver, B.C.
- Granville, H. G., Hendrick, R. C., Curlette, W. L. (2012, April). *CCLCs: A case study of a CFG model with promising school-wide NCATE PDS standards outcomes*. Paper presented at the 2012 AERA Annual Meeting, Vancouver, B.C.
- Curlette, W. L., Hendrick, R. C., Ogletree, S. L., Benson, G. T., Martin, C., & Granville, H. G. (2012, March). *Using the NAPDS nine essentials and the NCATE PDS standards to support partnerships: A new online instrument*, Paper presented at the 2012 Professional Development Schools National Conference, Las Vegas, NV.
- Curlette, W. L., Granville, H. G., Feinberg, J., Clarke, P. J., Benson, G. T., Ogletree, S. L., Hendrick, R. C., & Veazie, W. (2012, March). *Teacher candidates in a PDS year long residency program: Implementation and evaluation*, Paper presented at the 2012 Professional Development Schools National Conference, Las Vegas, NV.
- Curlette, W. L., Ogletree, S. L., Benson, G. T., Granville, H. G., & Hendrick, R. C., (2011, April). *Fidelity of implementation instrument based on NCATE PDS standards: A 4-year study and future directions*, Roundtable session presented at the 2011 AERA Annual Meeting, New Orleans, LA.
- Curlette, W. L., Benson, G. T., Ogletree, S. L., & Hendrick, R. C. (2011, March). *Benefits of engaging classrooms in anchor action research and relationships to a fidelity survey*, Paper presented at the 2011 Professional Development Schools National Conference, New Orleans, LA.
- Hendrick, R. C. (1995). *Effectively using instructional technology in math classrooms*, Paper presented at the 1995 International Confederation of Principals, Sydney, Australia

From: Rubin Salter, Jr. <rsjr3@aol.com>
To: rhendrick1 <rhendrick1@gsu.edu>
Subject: Closing the Achievement Gap
Date: Tue, Sep 10, 2019 3:31 pm

Dr. Hendrick:

Thank you for your prompt response. I accept the financial arrangements that you informed me of (approximately \$5,000.00). Payment will be made upon receipt of the report.

The Director of Desegregation has been in contact with Dr. Freitas to inform her that you would be contacting her. Dr. Freitas is unavailable this week for a telephonic conference call however, she can do an email conversation at anytime with you. Dr. Freitas email is Halley.Freitas@tUSD1.org she will be expecting to hear from you soon.

If you have any problems connecting with Dr. Freitas by email please let me know.

Regards,

Rubin

Rubin Salter, Jr.
Attorney at Law
The Law Office of Ruben Salter, Jr.
177 N. Church Avenue
Suite 903
Tucson, AZ 85701
(520) 623-5706
(520) 623-1716 fax
rsjr3@aol.com

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Plaintiffs' Exhibit D

***9/11/19 E-mail from Research Scientist
Dr. Robert Hendricks***

From: Robert Clayton Hendrick <rhendrick1@gsu.edu>
To: Halley.Freitas@tusd1.org <Halley.Freitas@tusd1.org>
Cc: rsjr3@aol.com <rsjr3@aol.com>
Subject: Joint Data Sharing Agreement
Date: Wed, Sep 11, 2019 6:42 am

Dr. Freitas,

I am Robert Hendrick and Mr. Ruben Salter has asked me to conduct a gap analysis regarding the racial achievement gap between White and African-American Students at TUSD. I am requesting a Joint Data Sharing agreement with TUSD to obtain deidentified data for the analysis. I understand that you are available by email and once the data agreement is executed, I would need the deidentified data for grades 3 through 11 by school. I would like to have data from school years 2012-13 through 2018-19. I understand that AzMERIT replaced AIMS in 2015 and that those scaled scores may not be comparable; however, that limitation would be noted in the gap analysis. Once the Joint Data Sharing Agreement is completed, the specific data requested is as follows:

1. Student Unique State Number (This is place of student name)
2. Gender
3. Race/Ethnicity
4. SES (a proxy measure such as Free or Reduced Lunch Eligibility)
5. Grade Level (3 through 11)
6. School Code
7. School Name
8. AzMERIT Reading Scale Score or AIMS Reading Scale Score (prior to spring 2015)
9. AzMERIT Math Scale Score or AIMS Math Scale Score (prior to spring 2015)

The data are requested for all students in grades 3 through 11 by school for schools years 2012-13, 2013-14, 2014-15, 2015-16, 2016-17, 2017-18, and 2018-19 (seven school years).

I will be anticipating the details needed for the Joint Data Sharing Agreement.

Thank you for your prompt consideration in this matter.

Sincerely,

Robert Hendrick, Ph.D.

Research Scientist

Center for Evaluation and Research Services (CERS)

CEHD 468, Georgia State University

404-413-8267

rhendrick1@gsu.edu

Plaintiffs' Exhibit E

Collective or Relevant E-mails as follows:

- 1) E-mail from TUSD #1 General Counsel Robert Ross providing limited information to Dr. Hendricks dated 9/16/19***

- 2) Subsequent E-mail from Dr. Hendricks to Fisher Plaintiffs' Counsel regarding the limited or inappropriate data received dated 9/17/19***

- 3) Multiple E-mails dated from 9/17/19 through 9/25/19 establishing Fisher Plaintiffs' Counsel repeated good faith efforts and related requests for necessary discovery of relevant information with the District's ultimate refusal to provide the requested information***

From: Ross, Robert <Robert.Ross@tusd1.org>
Sent: Monday, September 16, 2019 4:02 PM
To: rsjr3@aol.com; Robert Clayton Hendrick <rhendrick1@gsu.edu>
Cc: P. Bruce Converse <BConverse@dickinson-wright.com>; Taylor, Martha <Martha.Taylor@tusd1.org>
Subject: Data Set Used for Study

Good Afternoon, Rubin & Dr. Hendrick:

The attached data set was used to generate the findings in the report called, 'TUSD Cohort Study over 5 Years using AzMERIT Scores 2014-15 to 2018-19 Broken out by Ethnicity'. The cohort of students included in the study was derived by using all TUSD 3rd grades students in 2014-15 as the baseline and then retaining every student who had AzMerit test scores in ELA, Math, or both, for that year and each subsequent year through 7th grade in 2018-19. The data set includes slightly more students with 5 consecutive years of data in Math (N=2,086) than students in ELA (N=2,062). Some students with 5 consecutive years of ELA test scores did not have 5 consecutive years of math test scores and vice-versa. Therefore, the randomly generated unique student ID in the 2 data sets are not comparable.

The attached spreadsheet includes two separate worksheets, one for ELA test results and one for Math test results. The following data appears in the same columns in each worksheet:

1. Column A: unique student identifier
2. Column B: USP Ethnicity
3. Column C: School year for following test data
4. Column D: AzMERIT Test Name for following test data
5. Column E: AzMERIT Scale Score for the prior listed year and test
6. Column F: AzMERIT Performance Level for the prior listed year and test
7. Column G: AzMERIT Performance Description for the prior listed year and test.

The pattern from 3 – 7 above is repeated for each of the five years of testing in the study.

Regards,
Rob

From: Robert Clayton Hendrick <rhendrick1@gsu.edu>
To: rsjr3@aol.com <rsjr3@aol.com>
Subject: Gap Analysis for TUSD
Date: Tue, Sep 17, 2019 7:00 am

Rubin,

As you likely have seen Mr. Ross has sent me the data for the cohort described in Dr. Freitas study. These are not the data which I requested, but a small, select subset of student data from students that comprise a cohort that has five years of consecutive AzMERIT scale scores (2015 through 2019). While these data may help demonstrate that the gap is not static, these data do not provide information for a comprehensive report. Below I have stated that in a return email to Mr. Ross. I wanted to check with you before I communicated with TUSD. These data, in my opinion, falls short of supporting a more comprehensive gap analysis – on the other hand it may be all the data that TUSD is willing to give. Since you are closer to the situation, you may know whether they may give me those data requested. I will await your counsel before responding.

DRAFT (NOT SENT)

Mr. Ross,

Thank you for these data used to generate the Cohort Study over 5 Years. I have examined the data, and while examining a cohort is one way to examine an achievement gap for those students, I intend to conduct a comprehensive gap analysis similar in part to that of the National Center for Education Statistics and the American Institutes for Research in 2017. In that study, the achievement gap is examined through several lens, poverty (or proxy), race, race and poverty, racial density within schools, and how those factors may affect reading and math scores over time. For example, has the fourth, fifth, sixth, seventh and eighth grade racial gap changed in the school district from 2013 to 2019? How has it changed? The data for a specific cohort cannot inform those particular questions examined by a more comprehensive achievement gap analysis of TUSD. The performance of one cohort gives an indication of the achievement gap for those students, but does not produce persuasive findings regarding the total TUSD efforts over the last seven years.

Regards,

Robert

Robert Hendrick, Ph.D.

Research Scientist

Center for Evaluation and Research Services (CERS)

CEHD 468, Georgia State University

404-413-8267

rhendrick1@gsu.edu

From: Rubin Salter, Jr. <rsjr3@aol.com>
To: rhendrick1 <rhendrick1@gsu.edu>
Subject: Re: Gap Analysis for TUSD
Date: Tue, Sep 17, 2019 2:14 pm

Robert:

Pursuant to your suggestion I have contact Rob Ross and gave him a heads up that you will be requesting further data. He informed me that if they have the data it will be gathered and forward to you. Go ahead and respond.

Regards,

Rubin

Rubin Salter, Jr.
Attorney at Law
The Law Office of Rubin Salter, Jr.
177 N. Church Avenue
Suite 903
Tucson, AZ 85701
(520) 623-5706
(520) 623-1716 fax
rsjr3@aol.com

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-----Original Message-----

From: Robert Clayton Hendrick <rhendrick1@gsu.edu>
To: rsjr3@aol.com <rsjr3@aol.com>
Sent: Tue, Sep 17, 2019 7:00 am
Subject: Gap Analysis for TUSD

Rubin,

As you likely have seen Mr. Ross has sent me the data for the cohort described in Dr. Freitas study. These are not the data which I requested, but a small, select subset of student data from students that comprise a cohort that has five years of consecutive AzMERIT scale scores (2015 through 2019). While these data may help demonstrate that the gap is not static, these data do not provide information for a comprehensive report. Below I have stated that in a return email to Mr. Ross. I wanted to check with you before I communicated with TUSD. These data, in my opinion, falls short of supporting a more comprehensive gap analysis – on the other hand it may be all the data that TUSD is willing to give. Since you are closer to the situation, you may know whether they may give me those data requested. I will await your counsel before responding.

DRAFT (NOT SENT)

Mr. Ross,

Thank you for these data used to generate the Cohort Study over 5 Years. I have examined the data, and while examining a cohort is one way to examine an achievement gap for those students, I intend to conduct a comprehensive gap analysis similar in part to that of the National Center for Education Statistics and the

American Institutes for Research in 2017. In that study, the achievement gap is examined through several lens, poverty (or proxy), race, race and poverty, racial density within schools, and how those factors may affect reading and math scores over time. For example, has the fourth, fifth, sixth, seventh and eighth grade racial gap changed in the school district from 2013 to 2019? How has it changed? The data for a specific cohort cannot inform those particular questions examined by a more comprehensive achievement gap analysis of TUSD. The performance of one cohort gives an indication of the achievement gap for those students, but does not produce persuasive findings regarding the total TUSD efforts over the last seven years.

Regards,
Robert
Robert Hendrick, Ph.D.
Research Scientist
Center for Evaluation and Research Services (CERS)
CEHD 468, Georgia State University
404-413-8267
rhendrick1@gsu.edu

From: Robert Clayton Hendrick <rhendrick1@gsu.edu>

To: Ross, Robert <Robert.Ross@tusd1.org>; rsjr3@aol.com <rsjr3@aol.com>

Cc: P. Bruce Converse <BConverse@dickinson-wright.com>; Taylor, Martha <Martha.Taylor@tusd1.org>

Subject: RE: Data Set Used for Study

Date: Wed, Sep 18, 2019 6:09 am

Mr. Ross,

Thank you for these data used to generate the Cohort Study over 5 Years. I have examined the data, and while examining a cohort is one way to examine an achievement gap for those students, I intend to conduct a comprehensive gap analysis similar in part to that of the National Center for Education Statistics and the American Institutes for Research in 2017. In that study, the achievement gap is examined through several lens, poverty (or proxy), race, race and poverty, racial density within schools, and how those factors may affect reading and math scores over time. For example, has the fourth, fifth, sixth, seventh and eighth grade racial gap changed in the school district from 2013 to 2019. The data for a specific cohort cannot inform those particular questions examined by a more comprehensive achievement gap analysis of TUSD. The performance of one cohort gives an indication of the achievement gap for those students, but does not produce persuasive findings regarding the total TUSD efforts over the last seven years.

Therefore, I would still like to respectfully request these data to conduct the more comprehensive achievement gap analysis:

1. Student Unique State Number (This is place of student name)
 2. Gender
 3. Race/Ethnicity
 4. SES (a proxy measure such as Free or Reduced Lunch Eligibility)
 5. Grade Level (3 through 11)
 6. School Code
 7. School Name
 8. AzMERIT Reading Scale Score or AIMS Reading Scale Score (prior to spring 2015)
 9. AzMERIT Math Scale Score or AIMS Math Scale Score (prior to spring 2015)
- The data are requested for all students in grades 3 through 11 by school for schools years 2012-13, 2013-14, 2014-15, 2015-16, 2016-17, 2017-18, and 2018-19 (seven school years).

Regards,

Robert

Robert Hendrick, Ph.D.

Research Scientist

Center for Evaluation and Research Services (CERS)

CEHD 468, Georgia State University

404-413-8267

rhendrick1@gsu.edu

From: Rubin Salter <kristian.salter@gmail.com>
To: Ross, Robert <Robert.Ross@tusd1.org>
Cc: rubin(dad) salter <rsjr3@aol.com>; P. Bruce Converse <BConverse@dickinson-wright.com>
Subject: Re: Dr. Hendrick's request
Date: Tue, Sep 24, 2019 5:24 pm

Robert,

I was sorry to learn that the District felt the request for additional data by Fisher Expert Dr. Hendrick was unreasonable. Especially in light of the fact that he requires such data to enable him to do a more thorough report.

It is my understanding that the additional data he is seeking is something that any school district would have reasonably collected about its students.

Dr. Hendricks has opined that if he had the additional data he requested he is positive that it will show that the black students lagged two years behind white students by the time they reach the seventh grade.

This material is necessary in order for Fisher Plaintiffs to show that the District has not removed the last vestiges of past discrimination. In essence that instead of closing the achievement gap it is widening.

Since the district has opted to take the position the the data request is unreasonable that leaves the Fishers with three options:

1. File a Motion to Compel.
2. Request Subpoena Duces Tecum for Dr. Freitas to produce the requested records at her deposition.
3. Given the tacit admissions of Dr. Trujillo and in Dr. Freitas report that the achievement gap is not closing, Fishers would agree to a stipulation that the achievement gap between black and white students in K-7 has widened and that black students are two years behind.

Should it be necessary that Fisher Plaintiffs file a motion, Fisher Plaintiffs will be seeking attorneys fees and costs.

Thanks,

Rubin

The Law Office of Rubin Salter, Jr.
177 N. Church Ave. , Suite 903
Tucson, AZ 85701
(p) 520.623.5706
(f) 520.623.1716
salterlawoffice@gmail.com

On Sep 24, 2019, at 10:29 AM, Ross, Robert <Robert.Ross@tusd1.org> wrote:

Good Morning, Rubin:

I am sorry I was unable to get an answer for you on this before the end of the day yesterday.

I was able to inquire further about Dr. Hendrick's request for long-term data in addition to the data we sent him last week. We do not currently have the requested student-level data set reflecting all of Dr. Hendrick's parameters even for the current set we already sent, much less going back to 2012. District staff would have to try to create the data from a number of resources. Given the circumstances (including the data we have already provided, the cost, time and effort required, and the standards for unitary status), we do not see the request as reasonable to fulfill.

Should you wish to pursue this further, we suggest that the Special Master review the issue.

Rob

Robert Ross
General Counsel
Tucson Unified School District
1010 E 10th Street
Tucson, AZ 85719
(520) 225-6040

Plaintiffs' Exhibit F

***E-mail from Superintendent Trujillo
to Fisher Plaintiffs' Counsel Rubin Salter, Jr., Esq.
dated 2/15/20 with attached copy of
TUSD #1's Viscount Hotel Power Point Presentation***

From: Trujillo, Gabriel <Gabriel.Trujillo@tusd1.org>

To: Rubin Salter, Jr. <rsjr3@aol.com>

Cc: lhrichardson2000@yahoo.com <lhrichardson2000@yahoo.com>; gloria.c.copeland@hotmail.com <gloria.c.copeland@hotmail.com>; Ross, Robert <Robert.Ross@tusd1.org>; P. Bruce Converse <BConverse@dickinson-wright.com>; Brown, Samuel <Samuel.Brown@tusd1.org>; Taylor, Martha <Martha.Taylor@tusd1.org>

Subject: Re: Additional agenda items

Date: Sat, Feb 15, 2020 4:53 pm

Attachments: AA Community Update 1-30-20.pdf (5284K)

Good afternoon,

I have provided you with the exact presentation that was shared with the community on January 30th. In reviewing the requested agenda items, I don't find them to be relevant to collaboratively discussing our USP implementation efforts or improving academic outcomes for African American students. The Fisher Plaintiff Representatives will receive an invitation to attend our next community update meeting.

Gabriel Trujillo, Ed.D. | Superintendent

Tucson Unified School District

1010 E 10th Street, Tucson, AZ. 85719

Phone: 225-6282 | Fax: 225-6419

gabriel.trujillo@tusd1.org

Delivering Excellence in Education Every Day

Grow • Reach • Succeed

This is where
Students love to Learn
Teachers love to Teach
and People love to Work
We are Tucson Unified



From: "Rubin Salter, Jr." <rsjr3@aol.com>

Date: Thursday, February 13, 2020 at 4:08 PM

To: "Trujillo, Gabriel" <Gabriel.Trujillo@tusd1.org>

Cc: "lhrichardson2000@yahoo.com" <lhrichardson2000@yahoo.com>, "gloria.c.copeland@hotmail.com" <gloria.c.copeland@hotmail.com>

Subject: Additional agenda items

TUCSON UNIFIED
SCHOOL DISTRICT

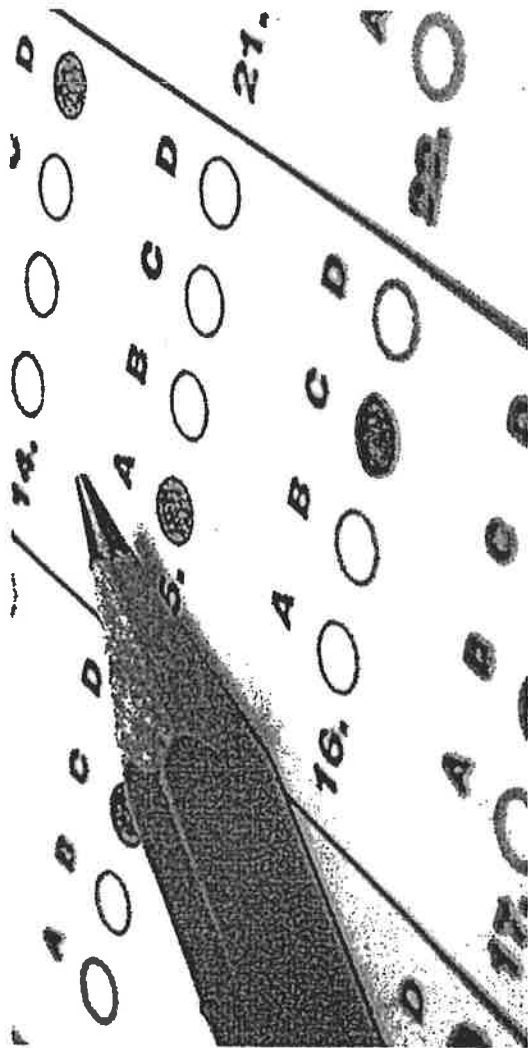


**Welcome Parents and Community
Advisory Meeting
Thursday, January 20, 2020**

African American Student Achievement Desegregation Updates

**There is great power in harmony and
mutual understanding.**

Three Year Comparison



AzMerit in
 Tucson Unified
 SY2016 - 17
 SY2019 - 20

Dr. Gabriel Trujillo



Tucson Unified AZMERIT 2018-2019

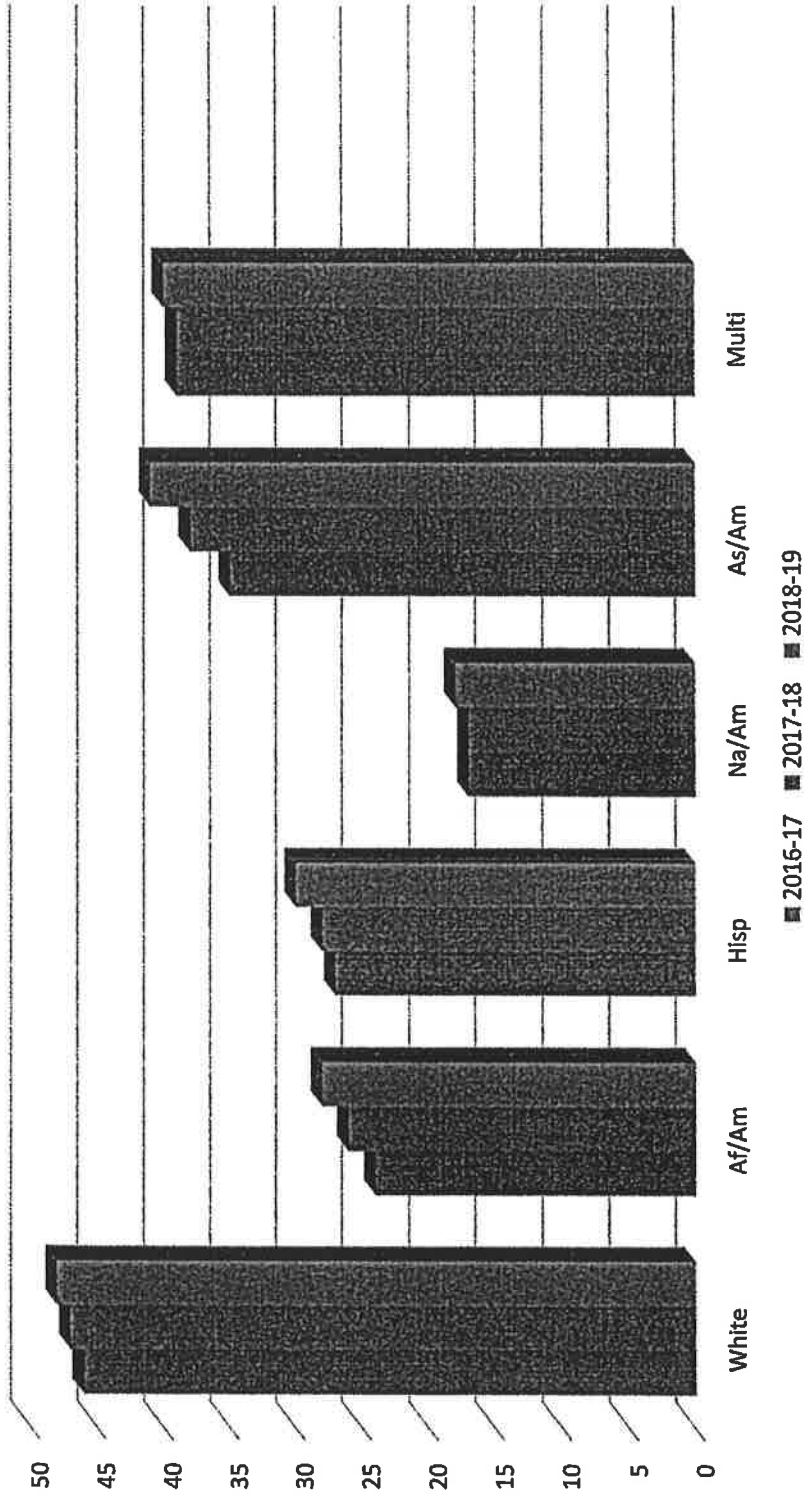
Math 10% or more in growth
• Hudlow
• Holladay
• Manzo
• Maldonado
• Cavett
• Ochoa
• Collier
• Utterback MS

ELA 10% more in growth
• Manzo
• Oyama
• Collier
• Holladay
• Maldonado
• Bonillas

5% or more in Both ELA & Math
• Manzo
• Holladay
• Maldonado
• Hudlow
• Cavett
• Ochoa
• Collier
• Howell
• Erickson
• Warren

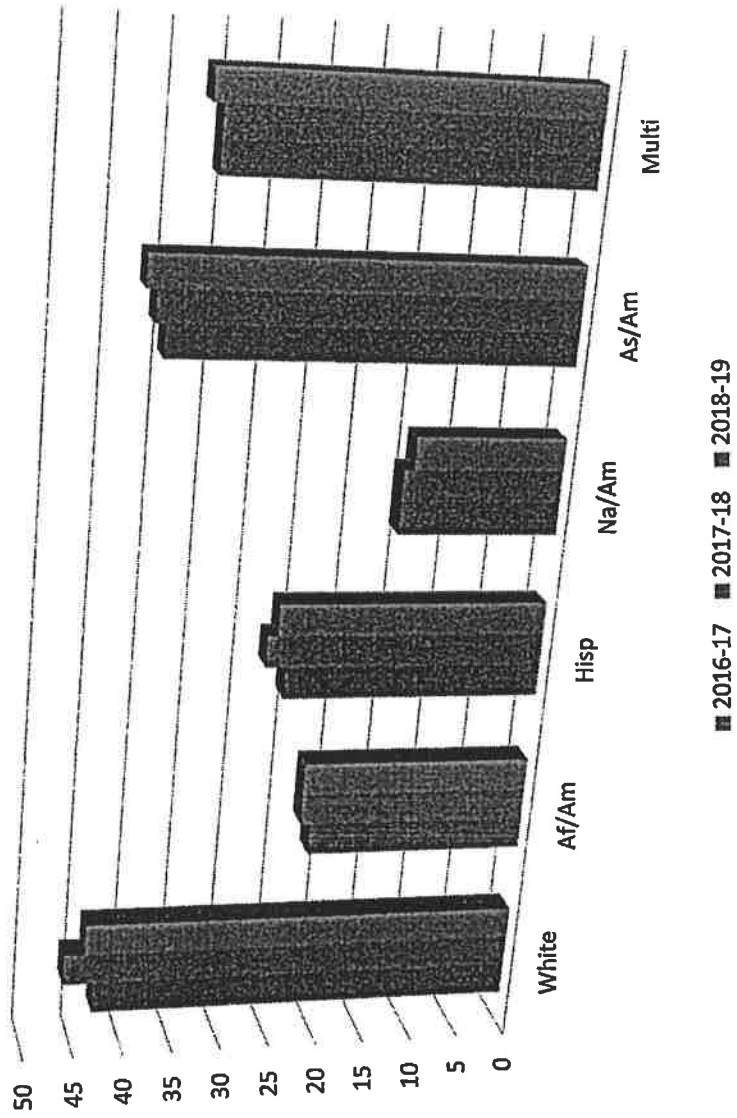
Three Year Comparison of TUSD AZMERIT

English Language Arts: Percent Over Proficiency by Ethnicity



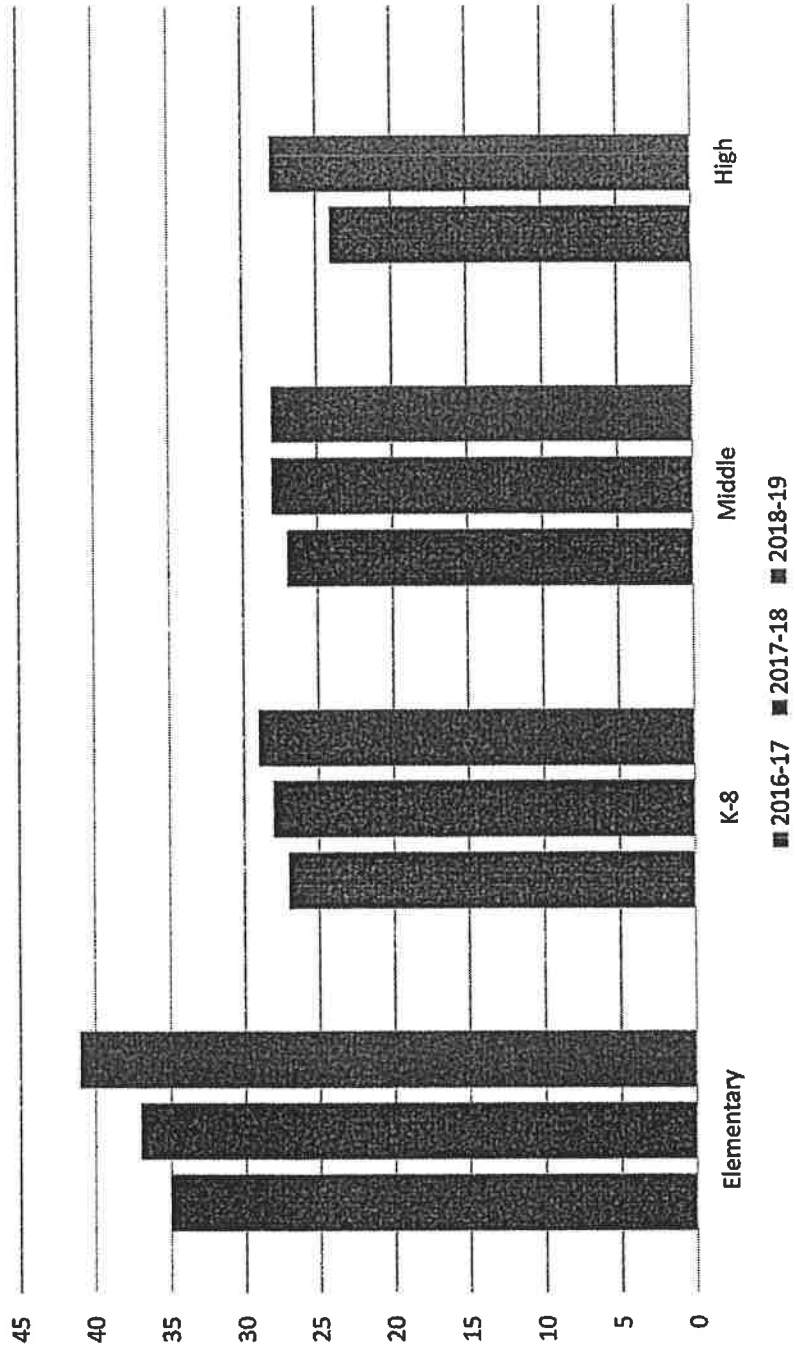
Three Year Comparison of TUSD AZMERIT

Math: Percent Over Proficiency by Ethnicity



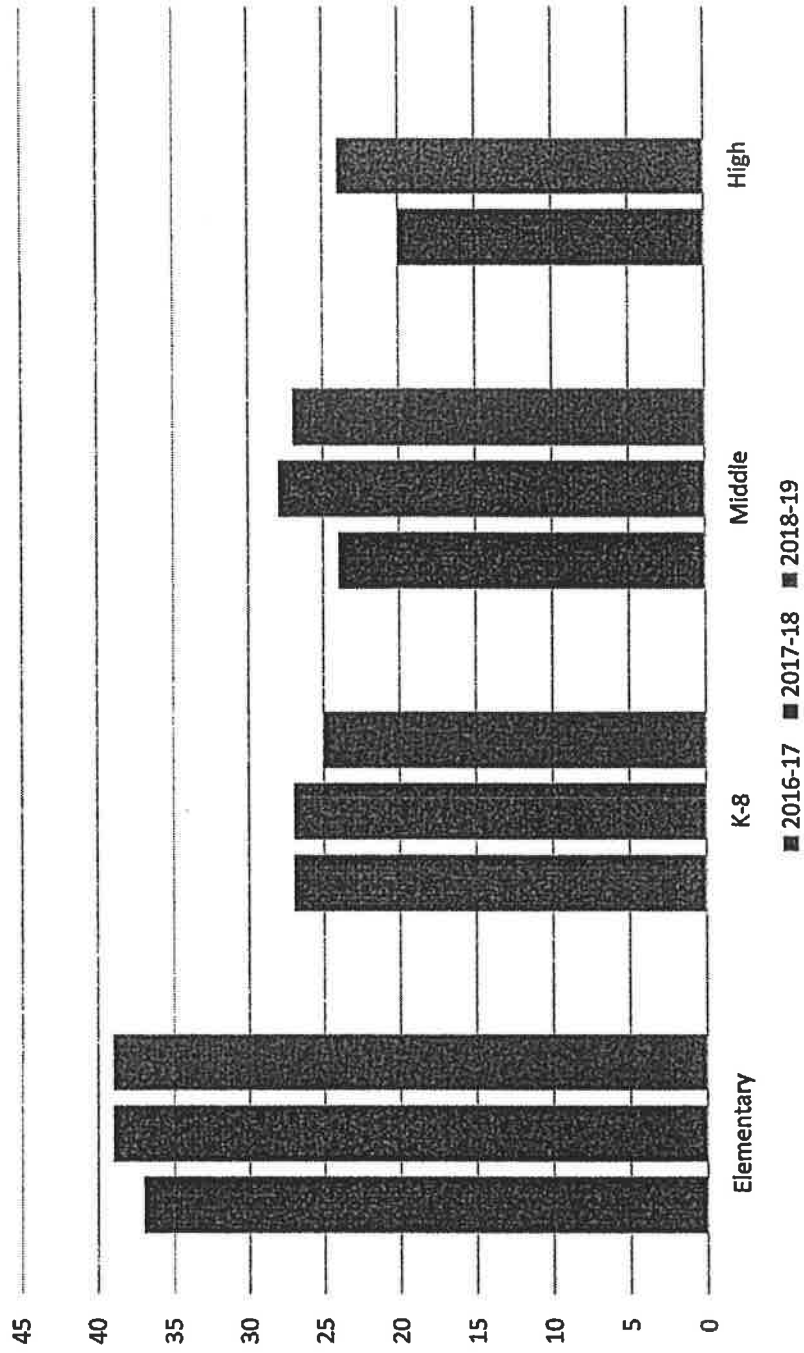
Three Year Comparison of TUSD AZMERIT

ELA: Percent Proficiency by Grade Level



Three Year Comparison of TUSD AZMERIT

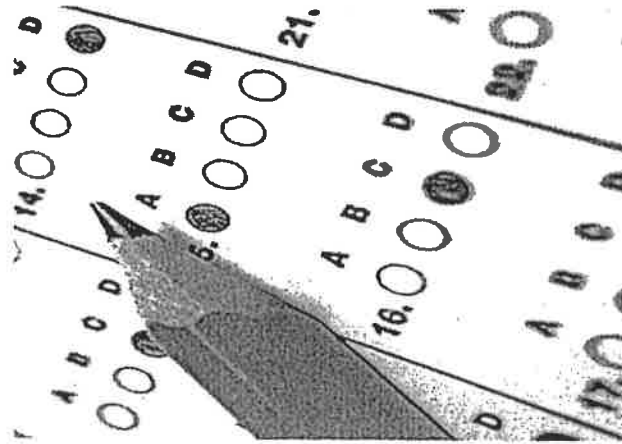
Math: Percent Proficiency by Grade Level



Summary of AzMERIT Data

TUSD:

- showed improvement over 3 years on AzMERIT
- has about a 10% gap from the state average in grades 3-5 and about a 15% gap in grades 6-8
- showed higher gains from 2017-18 to 2018-19 than the State in the following grades:
 - ELA: Grades 3, 5, 6, and 8
 - Math: Grade 3
- Ethnicities showed increased proficiency in both ELA and math over three years
- gains were highest in grades 3-5, followed by grades 6-8



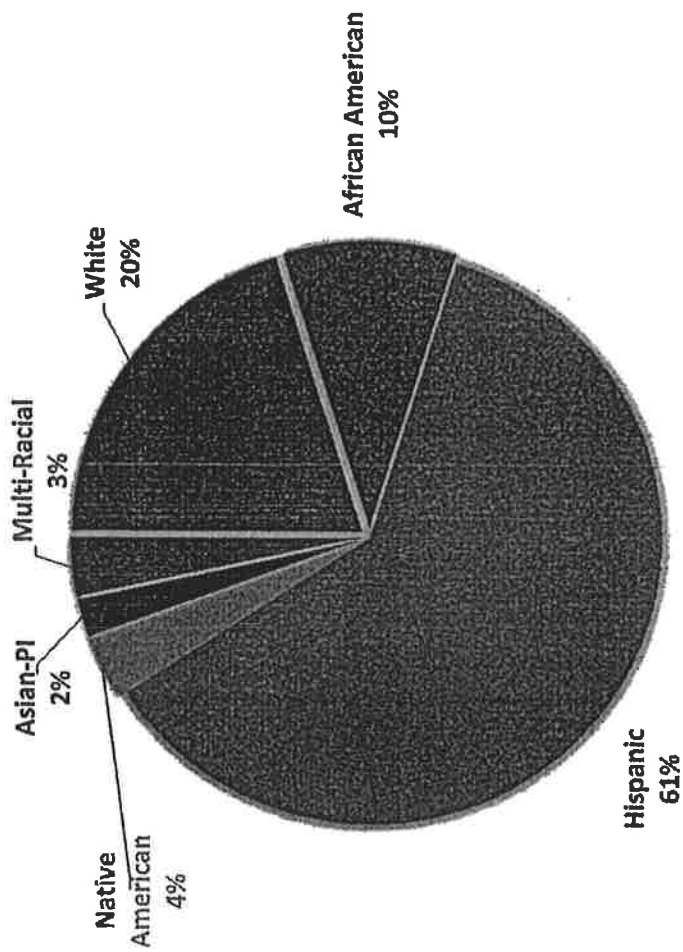
TUSD 2019-20 African American School Data

*using 40th day enrollment (09/26/2019)
and USP Ethnicity*

Tucson Unified School District, Assessment & Evaluation
January, 2020



2019-20 Breakdown of TUSD Students by USP Ethnicity (African American Students make up 10% of Total District Population)



2 Year Comparison of Enrollment of African American Students by Grade

Grade	2018-19 40th Day Count	40th Day %	2019-20 40th Day Count	40th Day %
KG	325	8%	350	8%
1	305	7%	341	8%
2	329	8%	309	7%
3	319	8%	341	8%
4	332	8%	328	8%
5	372	9%	338	8%
6	311	7%	351	8%
7	320	8%	313	7%
8	271	7%	314	7%
9	328	8%	358	8%
10	297	7%	312	7%
11	376	9%	272	6%
12	274	7%	349	8%
Total	4,159	100%	4,276	100%



School Type	School	N Size	% of Total
Elementary	Wright Elementary	136	3%
	Myers/Ganoung Elementary	91	2%
	Erickson Elementary	89	2%
	Wheeler Elementary	76	2%
	Kellond Elementary	74	2%
	Blenman Elementary	74	2%
	Bloom Elementary	54	1%
	Ford Elementary	50	1%
	Steele Elementary	50	1%
	K-8's	Roberts Naylor	174
Booth-Fickett		139	3%
Borman K-8		109	3%
Dietz K-8		102	2%

2019-20 Enrollment by Middle and High Schools for African American Students (40th Day)
Schools are included only if they have 50 or more Students.

School Type	School	N Size	% of Total
Middle	Doolen Middle School	116	3%
	Vail Middle School	100	2%
	Gridley Middle School	87	2%
	Mansfield Magnet Middle School	82	2%
	Magee Middle School	66	2%
	Secrist Middle School	50	1%
High	Tucson High Magnet School	285	7%
	Sahuaro High School	231	5%
	Rincon High School	191	5%
	Palo Verde High Magnet School	157	4%
	Catalina High School	110	3%
	Cholla High School	77	2%
	Sabino High School	72	2%
	Santa Rita High School	69	2%
Other	Schools with less than 50 students	1,365	32%

TUSD 2019-20 African American Students by Free and Reduced Lunch and School Type (40th Day)

Grade Levels	African American FRL Percent
Elementary Grades Pre-K- 5	72%
Middle Grades 6 - 8	73%
High School Grades 9 - 12	65%
Total	70%
TUSD Total	58%

2019-20 African American Students who receive ExEd Services by Grade (40th Day)

School Type	Total African American ExEd Students	Total District ExEd Students
Grades K - 5	13%	15%
Grades 6 - 8	17%	15%
Grades 9 -12	13%	12%
Total	14%	14%

2019-20 African American Students Quarterly Attendance Rates (40th Day)

School Level	African American Q1 Attendance Percent	TUSD Q1 Attendance Percent	African American Q2 Attendance Percent	TUSD Q2 Attendance Percent
Elementary	95%	94%	92%	92%
K-8	94%	93%	92%	90%
Middle	92%	92%	89%	89%
High	89%	89%	84%	85%
Alternative	81%	77%	74%	68%
Total	92%	92%	89%	89%

2019-20 TUSD Suspension Summary by Ethnicity for Q2

Student Ethnicity	Distinct Student Suspension	Distinct Student Enrollment	Suspension Percent of Population
All Students	992	44,613	2.22%
White	159	8,895	1.79%
African American	157	4,384	3.58%
Hispanic	598	27,214	2.20%
Native American	36	1,615	2.23%
Asian American	7	960	0.73%
Multi-Racial	35	1,545	2.27%

TUSD 2019-20 African American Students who were Suspended By Grade to Date (1/27/2020)

Included was any student who received a short and/or long term suspension

Grade Levels	Number of African American Students Suspended	African American Percent	TUSD Suspension Percent
Elementary	46	2.65%	1.14%
K-8	54	6.24%	3.52%
Middle	90	12.78%	8.91%
High	109	7.82%	4.87%
Alternative	5	15.15%	9.02%
Total	302	6.49%	3.97%

3 Years of Q1 African American ELA Benchmark Scores compared to the District

African American: Quarter 1 ELA

School Type	2017-18	2018-19	2019-20
ES	39%	35%	37%
K-8	39%	36%	42%
MS	31%	34%	36%
HS	26%	30%	36%

District Totals: Quarter 1 ELA

School Type	2017-18	2018-19	2019-20
ES	44%	41%	43%
K-8	38%	36%	39%
MS	38%	41%	44%
HS	34%	40%	45%

3 Years of Q1 African American Math Benchmark Scores compared to the District

African American: Quarter 1 MATH

School Type	2017-18	2018-19	2019-20
ES	31%	35%	33%
K-8	30%	34%	41%
MS	30%	35%	38%
HS	18%	33%	28%

District Totals: Quarter 1 MATH

School Type	2017-18	2018-19	2019-20
ES	39%	43%	42%
K-8	40%	39%	41%
MS	43%	45%	46%
HS	28%	45%	42%

2019- 20 African American K-3 Students DIBELS Scores

Beginning of Year – Students who scored at CORE

	N-Size	At Core	Core %
African American	1,272	630	50%
District	12,620	6,436	51%

Middle of Year – Students who scored at CORE

	N-Size	At Core	Core %
African American	1,242	590	48%
District	12,400	6,200	50%

2019-20 ALE Enrollment for African American Students (40th Day)

School Type	Total African American Students Enrolled in ALEs	Total African American Students	Percent of Total Population
Grades K-5	187	2007	9%
Grades 6 - 8	315	978	32%
Grades 9 - 12	398	1291	31%
Total	900	4276	21%

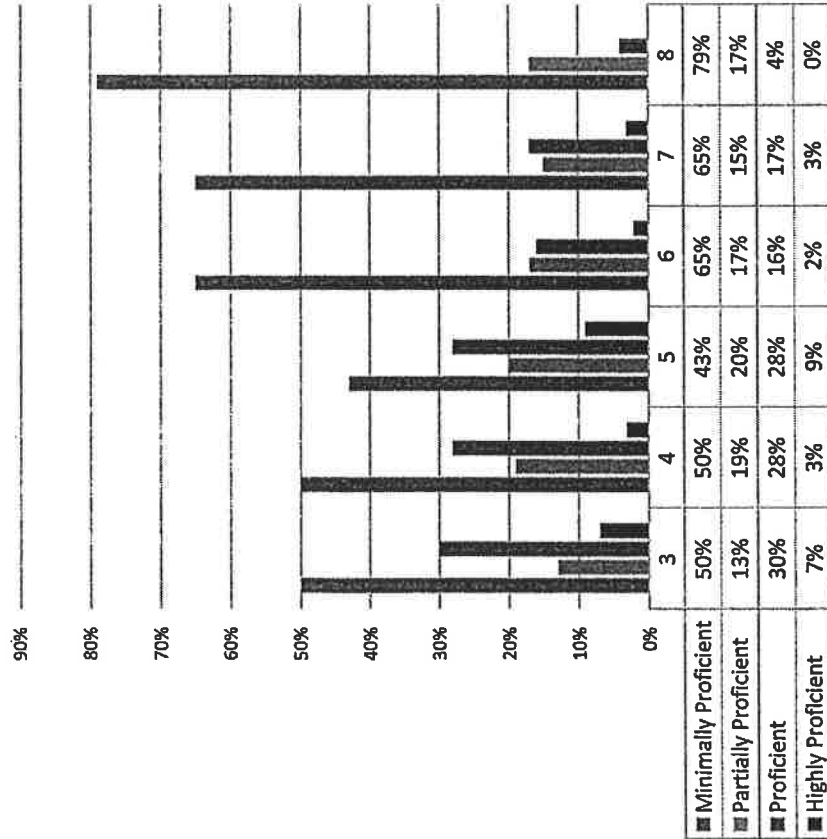
2019-20 ALE Course/Program Enrollment for African American Students (40th Day)

Students can be enrolled in more than one ALE, especially in High School

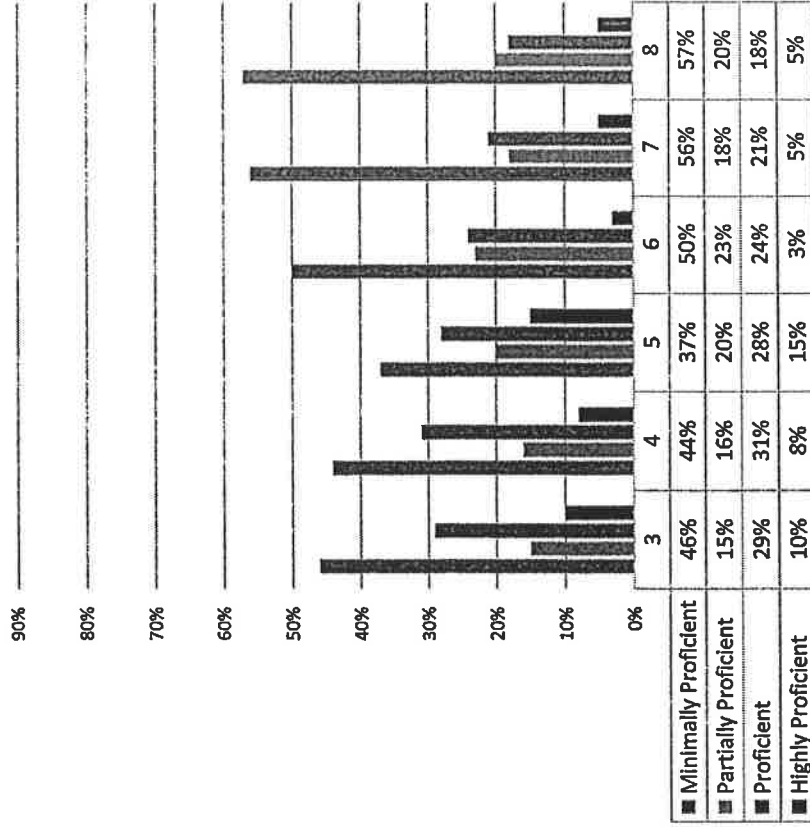
ALE Course/Program Participation Distribution													
School Type	Self Contained GATE (K-8)	Pull Out Gate	Resource GATE	Dual Language	UHS Enrollment	AP Course (HS)	MS Pre-AP Advanced (math)	MS/HS Pre-AP Honors (ELA, Sci, Soc Stud)	HS Dual Credit with College	IB (Cholla HS)	MS for HS Credit (math)	Total Courses	Courses Percent by School Type
ES	51	48		41								140	11%
K8	19	16	28	23			28	80			36	230	18%
MS	29		43				63	120			45	300	23%
HS			53		47	207		246	66	24		644	49%
Total	99	64	124	65	47	207	91	446	66	24	81	1314	100%
Percent by/Prog	8%	5%	9%	5%	4%	16%	7%	34%	5%	2%	6%		

2018-19 ELA AzMERIT Scores – African American Students compared to the District Average

African American

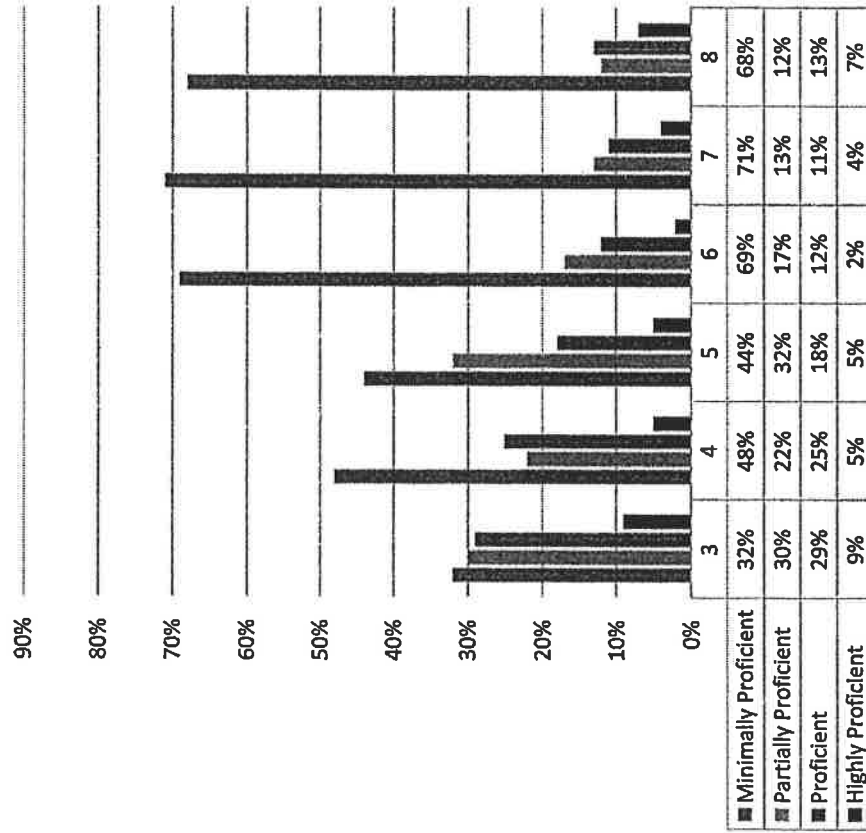


TUSD

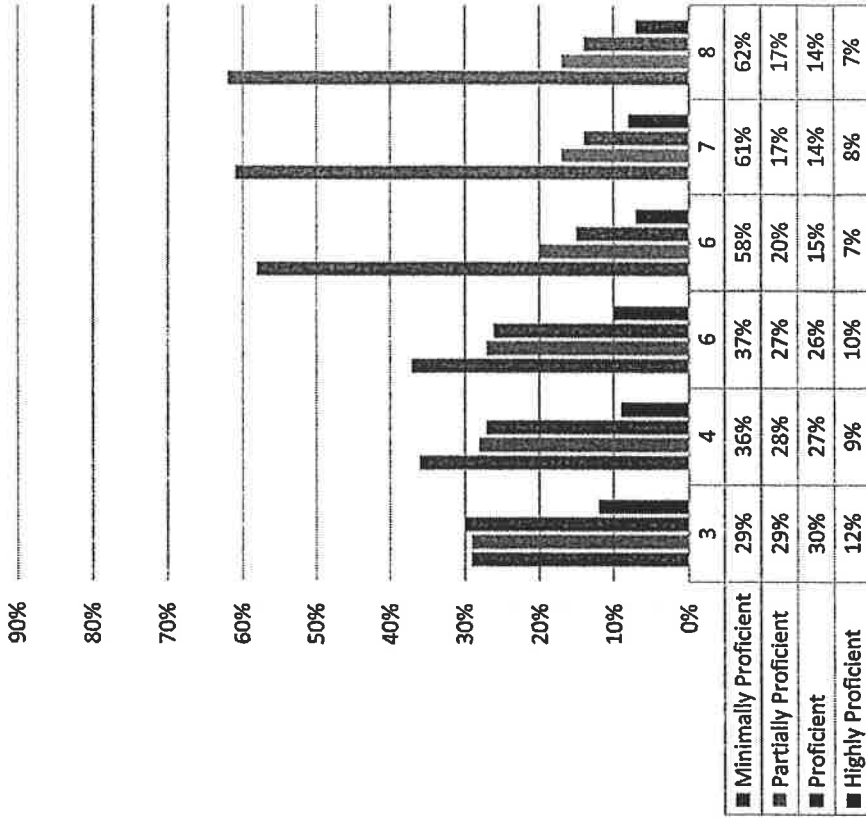


2018-19 MATH AzMERIT Scores for African American Students and compared to the District Average

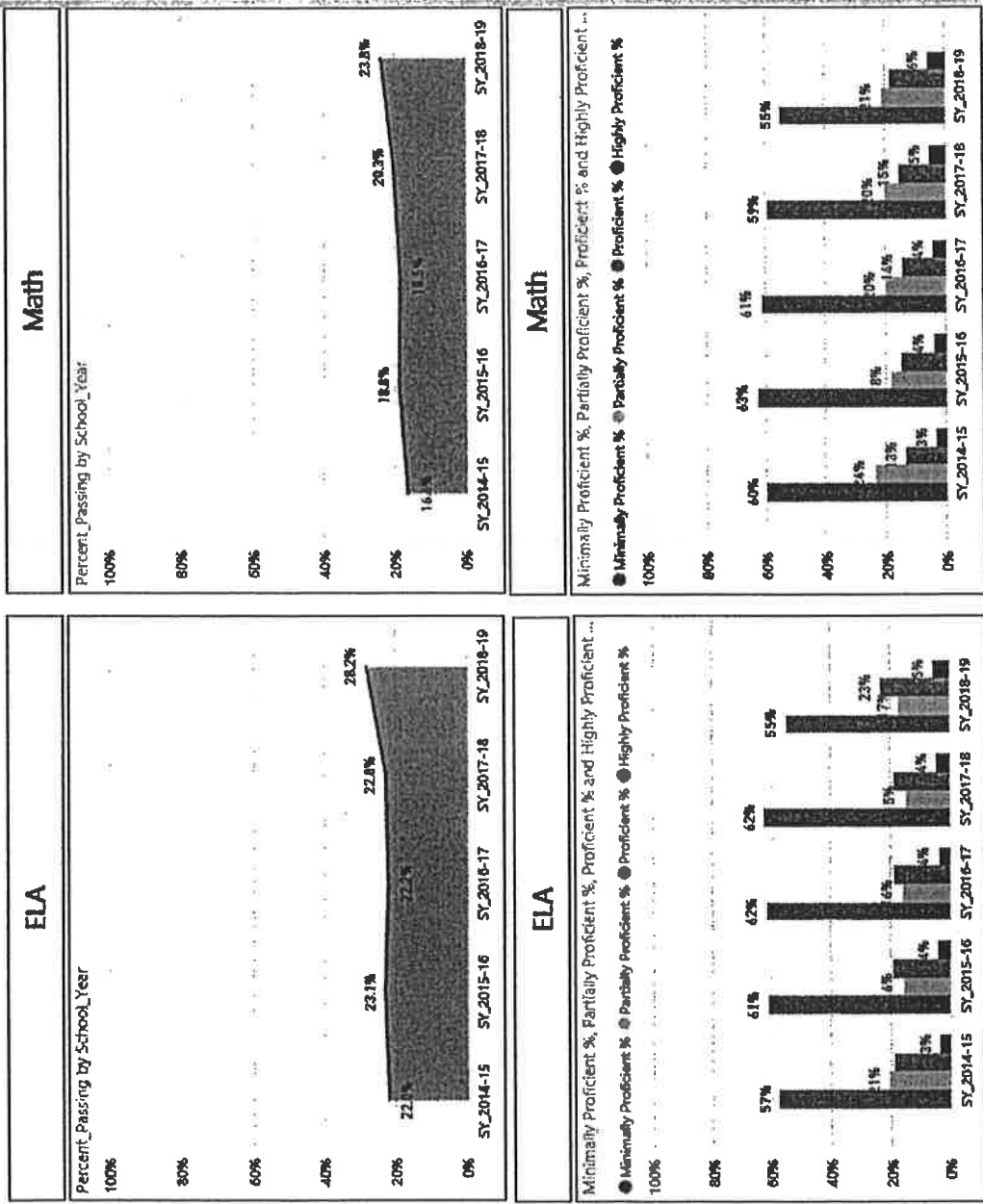
African American



TUSD

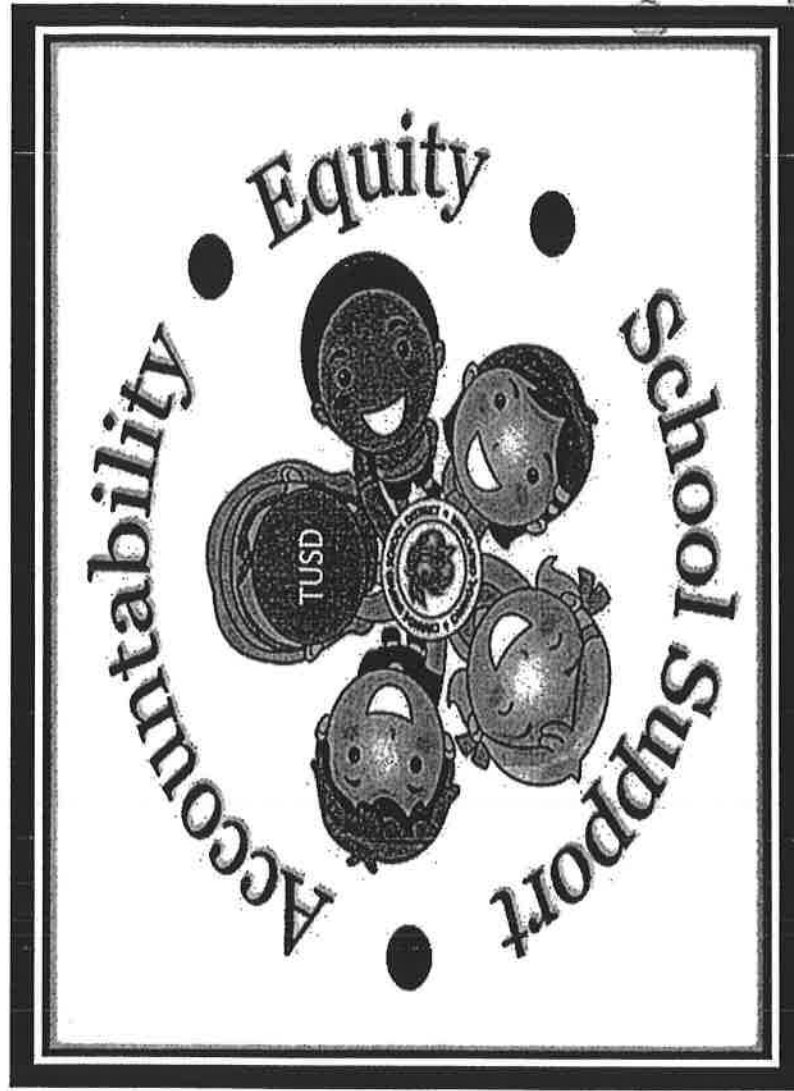


5 Year Summary of African American Student AzMERIT % Proficiency



**2019-20 African American Students (N=4,276 – 40th Day) in
TUSD and Their Aggregate Test Scores from 2018-19 - All Grades**

Test Type	Test Criteria	N Size who Took Test	% Passing	District Average
AzMERIT Spring 2019	AzMERIT ELA Percent Mastery	1630	28%	33%
	AzMERIT Math Percent Mastery	1638	24%	30%
	ACT English - Passing =>18	264	27%	41%
ACT 2019-20	ACT Math - Passing =>22	264	11%	24%
	ACT Reading - Passing => 21	264	22%	32%
	ACT Science - Passing => 20	264	19%	35%
SAT 2019-20	SAT Writing-Reading - Passing => 480	18	89%	98%
	SAT Math - Passing => 530	18	72%	90%



**Student Relations
Department**

Dan Bailey, Director of Student Relations

Veronica Duran, Coordinator

Charlotte Brown, Compliance Liaison

**Second Quarter Discipline Data
All Incidents - Three Year Comparison**

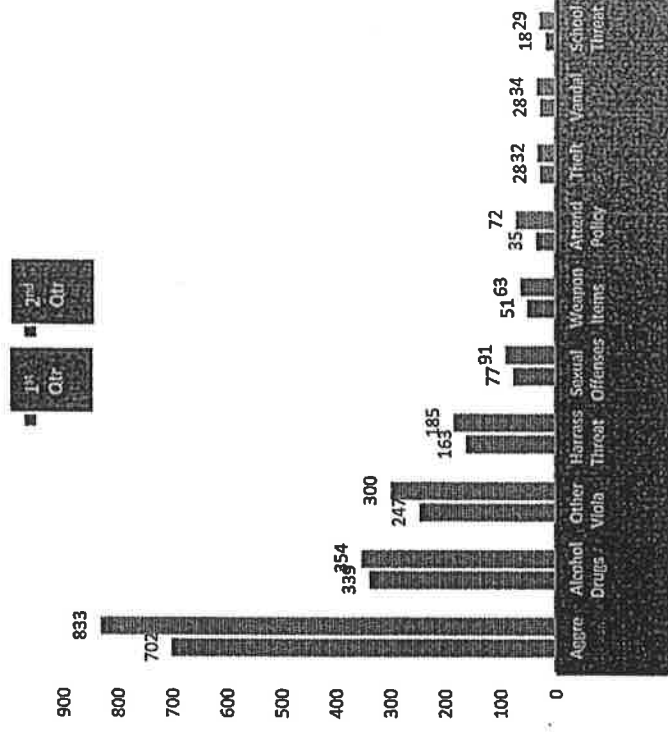
Highest # of Student Incidents for Two Years
Individual students involved incidents (Some students may be counted multiple times for incident categories)

Ranking	2017-2018		2018-2019		2019-2020		Total
	ALL		ALL		ALL		
1	Aggression	625	Aggression	591	Aggression	833	1,494
2	Alcohol, Tobacco, Drugs	168	Alcohol, Tobacco, Drugs	272	Alcohol, Tobacco, Drugs	354	300
3	Other Violations	160	Other Violations	100	Other Violations	300	185
4	Harassment, Threat & Other	109	Harassment, Threat & Other	81	Harassment, Threat & Other	185	91
5	Weapons & Dangerous Items	65	Sexual Offenses	67	Sexual Offenses	91	72
6	Sexual Offenses	64	Weapons & Dangerous Items	45	Attendance Policy	72	63
7	Vandalism	25	Attendance Policy	33	Weapons & Dangerous Items	63	34
8	Inappropriate Technology	22	Theft	16	Vandalism	34	32
9	Theft	20	Vandalism	15	Theft	32	29
10	Attendance Policy	20	School Threat	10	School Threat	29	

*All Incidents
Comparison 1st and 2nd Quarter 2019-2020*

Ranking	2019-2020 1st Quarter	2019-2020 2nd Quarter	Difference	
1	Aggression	702	833	131
2	Alcohol, Tobacco, Drugs	339	354	15
3	Other Violations	247	300	53
4	Harrasment, Threat & Other	163	185	22
5	Sexual Offenses	77	91	14
6	Weapons & Dangerous Items	51	72	37
7	Attendance Policy	35	63	12
8	Theft	28	34	6
9	Vandalism	28	32	4
10	School Threat	18	29	11

1ST & 2ND QUARTER

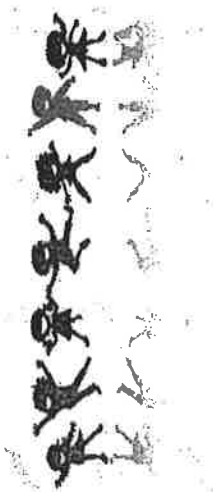


remember choices made in
anger can't be undone...

IG | @WITHBERKAN



Exclusionary Discipline



PBIS



Restorative Practices

Building Connections to Change Behaviors,
Repair Relationships and Improve Results



TOBACCO, ALCOHOL, DRUGS

ETHNICITY	VIOLATIONS	ENROLLMENT	PERCENTAGE
ALL	370	23,256	1.59%
WHITE	70	4,683	1.49%
AFRICAN AM	33	2,281	1.45%
HISPANIC	234	14,117	1.66%
ASIAN AM	3	496	0.60%
MULTI RACIAL	13	808	1.61%

2009-2010	23.09%
2010-2011	20.44%
2011-2012	20.06%
2012-2013	19.2%
2013-2014	20.51%
2014-2015	18.73%
2015-2016	13.03%
2016-2017	13.75
2017-2018	10.8%
2018-2019	11.34%

1st and 2nd semester 1920 June 2019-2020
**Number of students who participated:
 Interventions and Workshops**

- Fighting/Restorative/Behavior Interventions 1st and 2nd Offenses

	Total	1st Offense	2nd Offense	Restorative Behavior Intervention
First Semester 18-19	1819	549	44	326
First Semester 19-20	1920	615	67	306

Slightly higher # of 2nd offenses than last year.
 Middle School having more fights than HS

- Drug/Alcohol/Prevention
- Workshop 1st and 2nd Offenses

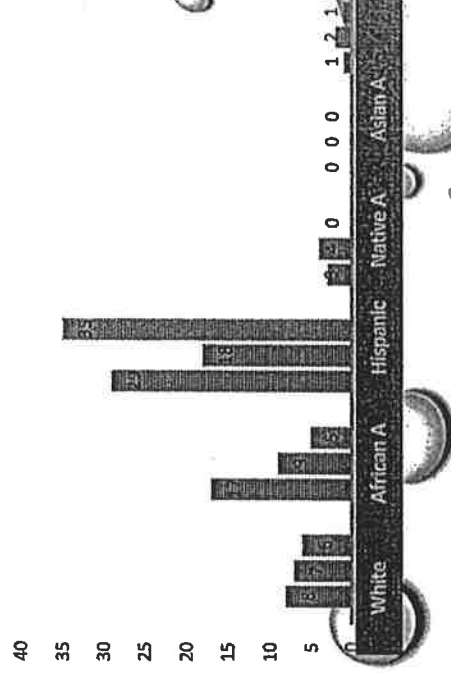
	Total	1st Offense	2nd Offense	Drug/Alcohol Workshops
First Semester 18-19	1819	448	54	296
First Semester 19-20	1920	569	68	355

Slightly higher # of 2nd offenses than last year.
 More students participated in workshops in 19-20

Second Quarter Incident Comparison
 Exclusionary Discipline
 Two and Three Year Comparison

Dispositions	2017-2018		2018-2019		2019-2020		3 Year 2017-2019		2 Year 2018-2019	
	#	%	#	%	#	%	#	%	#	%
Long Term Suspensions	58	0.12	40	0.09	47	0.11	11	0.01	7	0.02
White/Anglo	8	0.08	7	0.08	6	0.07	2	0.01	1	0.01
African American	17	0.39	9	0.21	5	0.11	12	0.28	4	0.10
Hispanic	29	0.1	18	0.07	35	0.13	6	0.12	17	0.06
Native American	3	0.18	4	0.24	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0	0
MultiRacial	1	0.06	2	0.13	1	0.06	0	0	1	0.07

LONG TERM

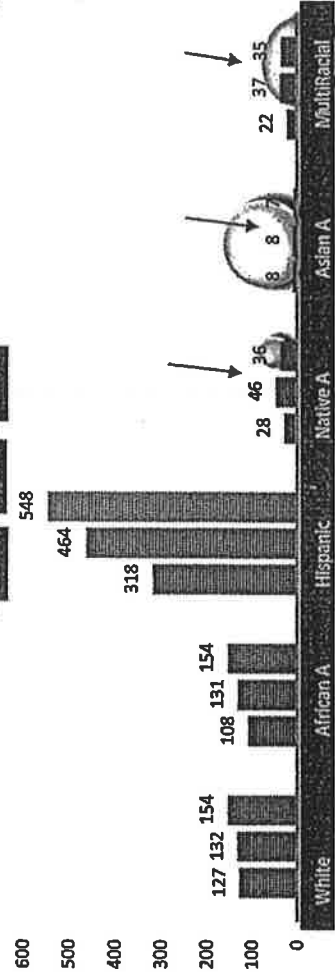


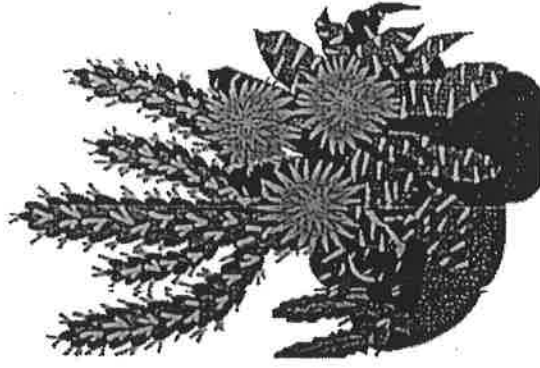
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*Second Quarter Incident Comparison
 Exclusionary Discipline
 Two and Three Year Comparison*

Dispositions	2017-2018		2018-2019		2019-2020		3 Year 2017-2019		2 Year 2018-2019	
	#	%	#	%	#	%	#	%	#	%
Short Term Suspension	611	1.32	818	1.82	964	2.16	953	.84	146	.34
White/Anglo	127	1.35	132	1.46	154	1.73	27	.38	22	.27
African American	108	2.49	131	3.05	154	3.51	46	1.02	23	.46
Hispanic	318	1.12	464	1.69	548	2.12	230	1	84	.43
Native American	28	1.64	46	2.78	36	2.23	8	.59	10	.55
Asian	8	0.81	8	0.81	7	0.73	1	.08	1	.08
MultiRacial	22	1.39	37	2.38	35	2.27	13	.88	2	.11

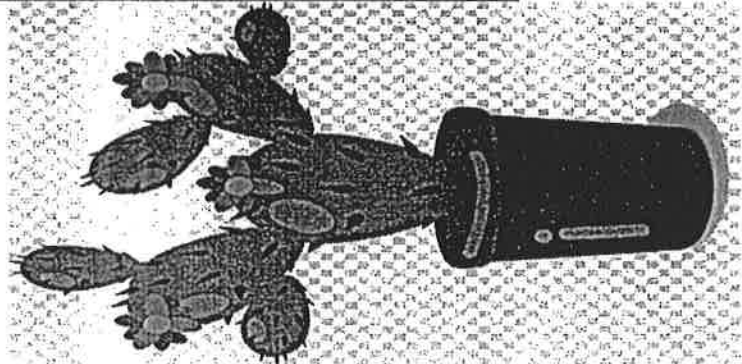
SHORT TERM





“There are people that will say ‘We don’t have time for school climate because we have so much on our plate,’ and my philosophy is school climate is actually the plate that everything else has to go on.”

- Peter DeWitt



Advanced Learning Experiences

AVID **ADVANCED**
LEARNING EXPERIENCES

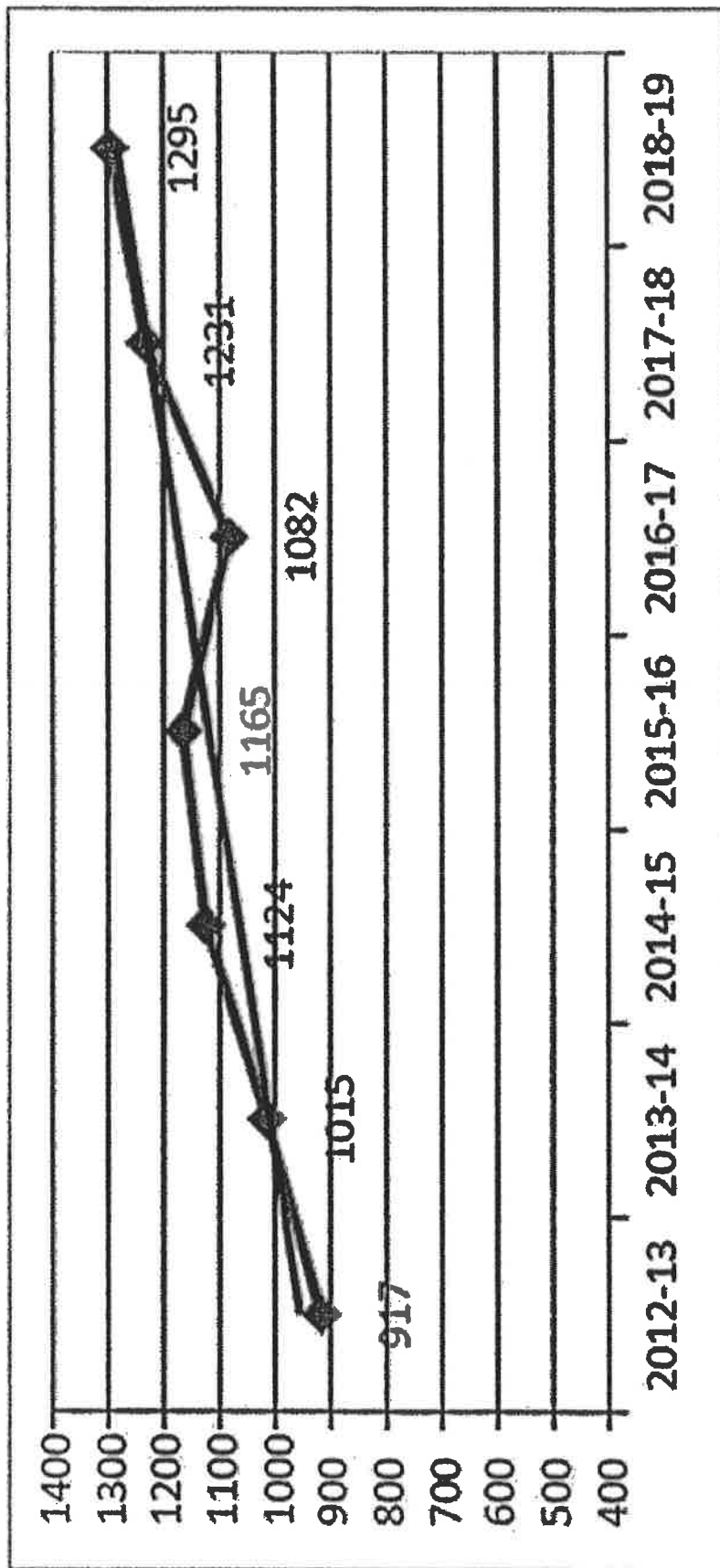


ALE course and program opportunities

- The Tucson Unified School District will ensure equitable access to advanced learning opportunities for all students.
- Advanced Learning Experiences (ALE) include:
 - ❖ Gifted and Talented (GATE) programs
 - ❖ Advanced Academic Courses (AACs)
 - ❖ University High School (UHS)
- ALE Support: Advancement Via Individual Determination (AVID)



ALE Participation

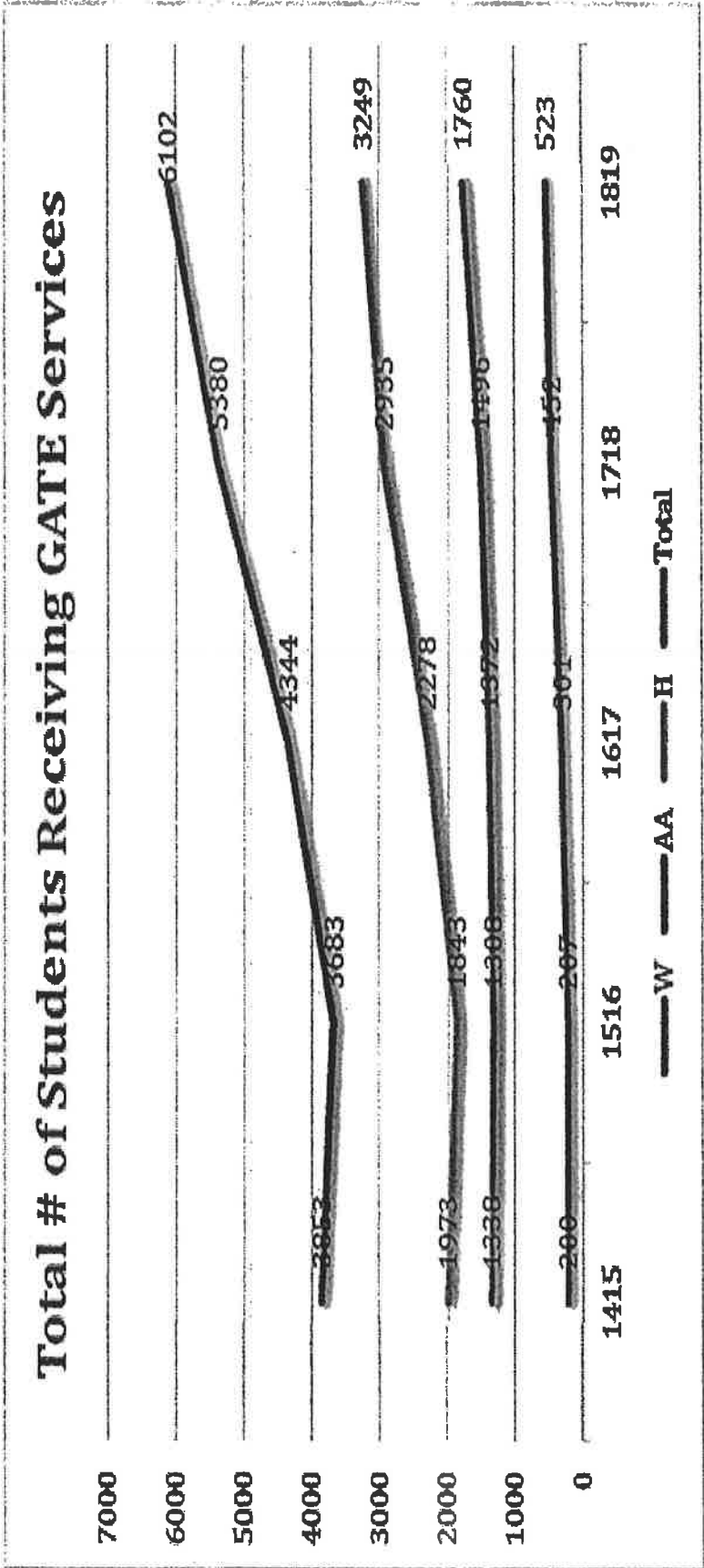


Total Number of ALEs taken by African American Students



GATE GIFTED AND TALENTED EDUCATION

- **Self Contained Classes:** Students attend full time at a school that accommodates the feeder pattern of the home school.
- **Pre GATE Kindergarten Services-** Students attend full time, five days per week and instruction is provided by a gifted-endorsed teacher.
- **Pull-Out Itinerant Services:** A GATE itinerant teacher is assigned to each elementary school. The amount of time/number of days at each school is dependent on the number of students served. The primary service is a pull-out program of approximately 90 minutes per week providing enriched instruction in small group setting.
- **Dual Language Program:** Students attend full time in self-contained classroom. Instruction in Spanish and English.
- **GATE Magnet and Cluster Models:** Students attend full time, receiving instruction from a Gifted endorsed teacher. Classrooms are comprised of qualified GATE students and general education students.
- **GATE MS/HS Resource:** GATE Resource services are open access. GATE instruction is provided in core enrichment classes and/or content classes.



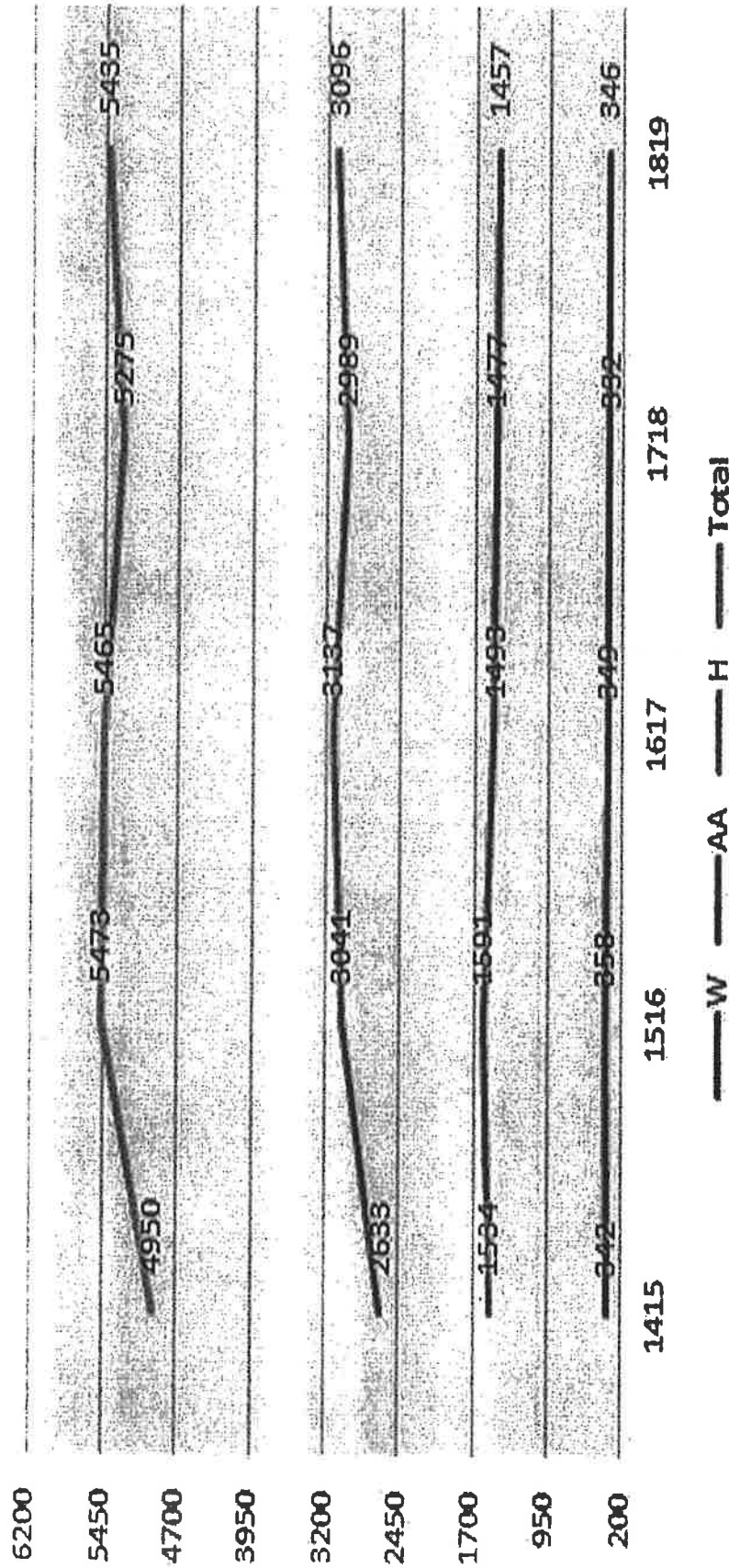
TOTAL NUMBER OF STUDENTS RECEIVING GATE SERVICES

- Advanced Placement (AP) courses
- International Baccalaureate (IB) Programme
- Dual credit courses
- Middle school courses offered for high school credit
- Dual Language Programs
- Honors courses
- Accelerated math courses

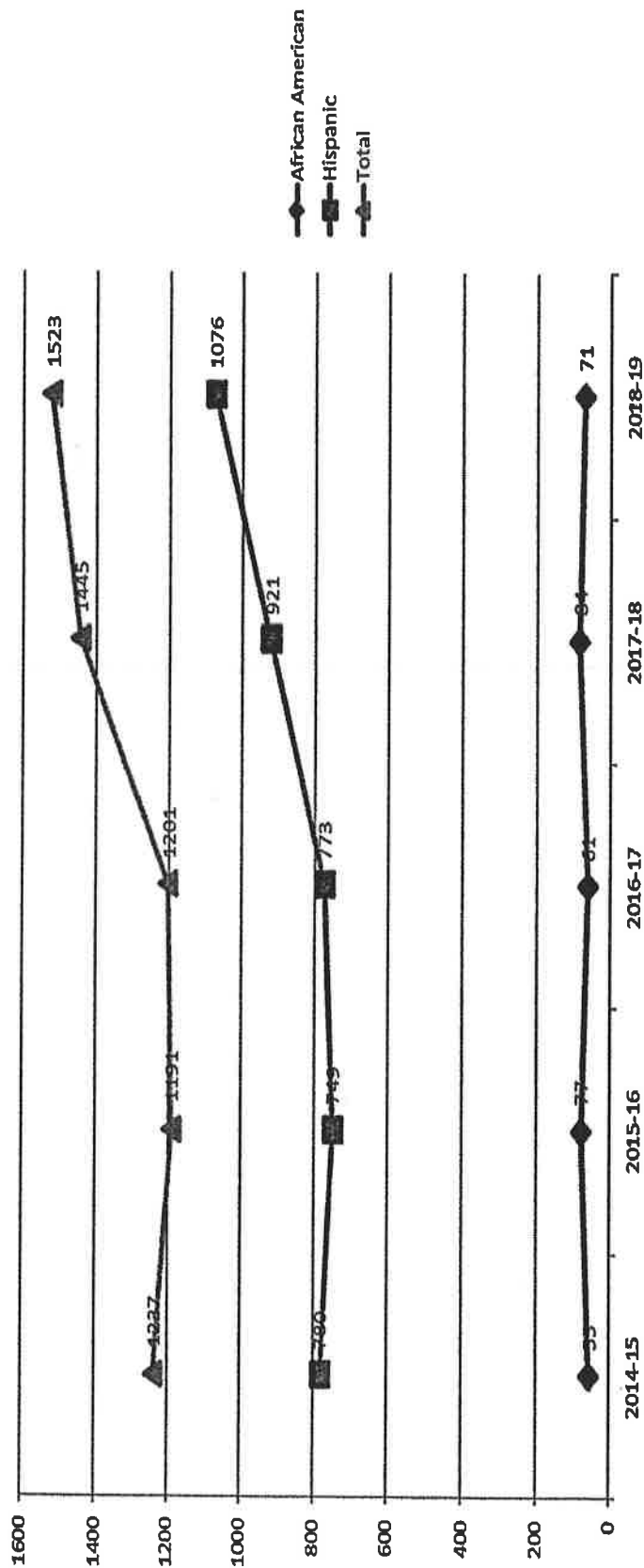
Advanced Academic Courses (AACs)



Honors Course Enrollment

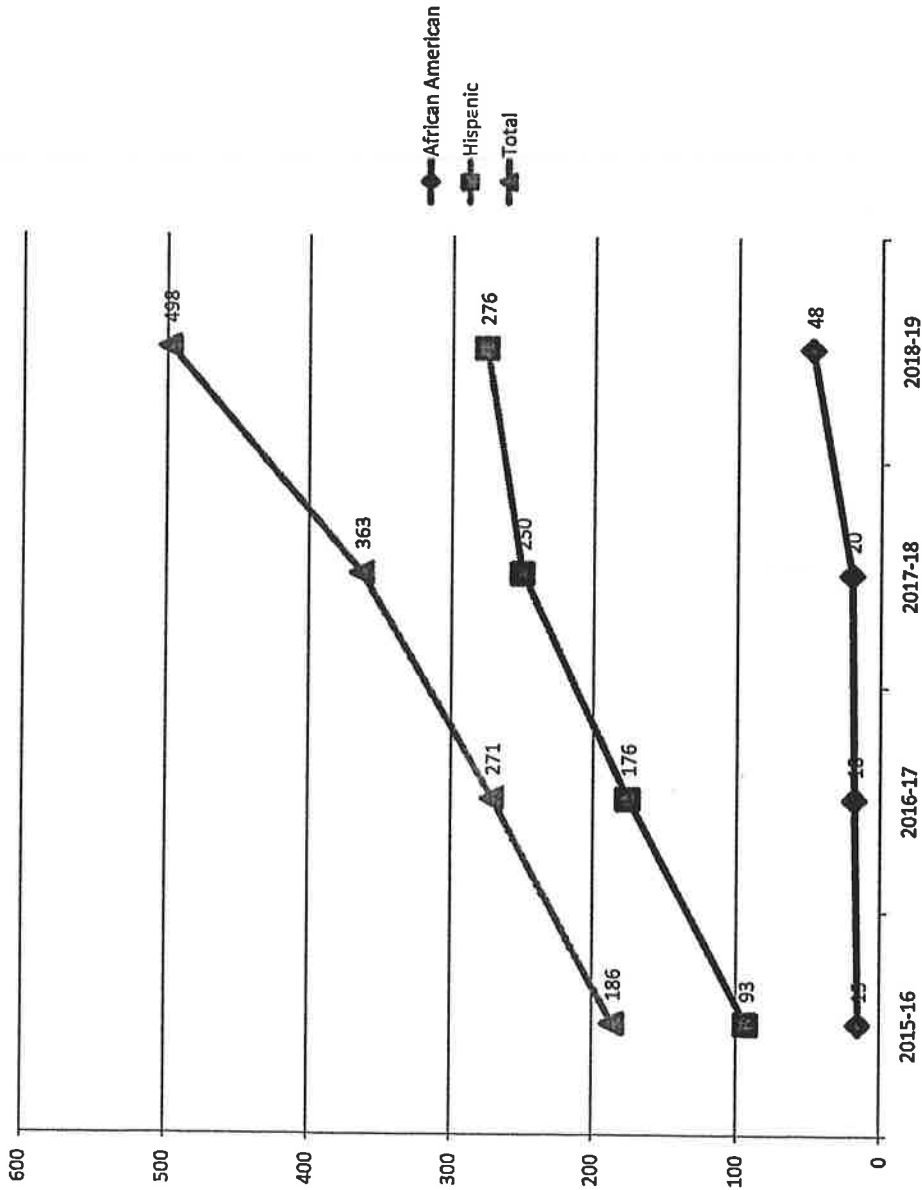


Middle School Courses for High School Credit Enrollment

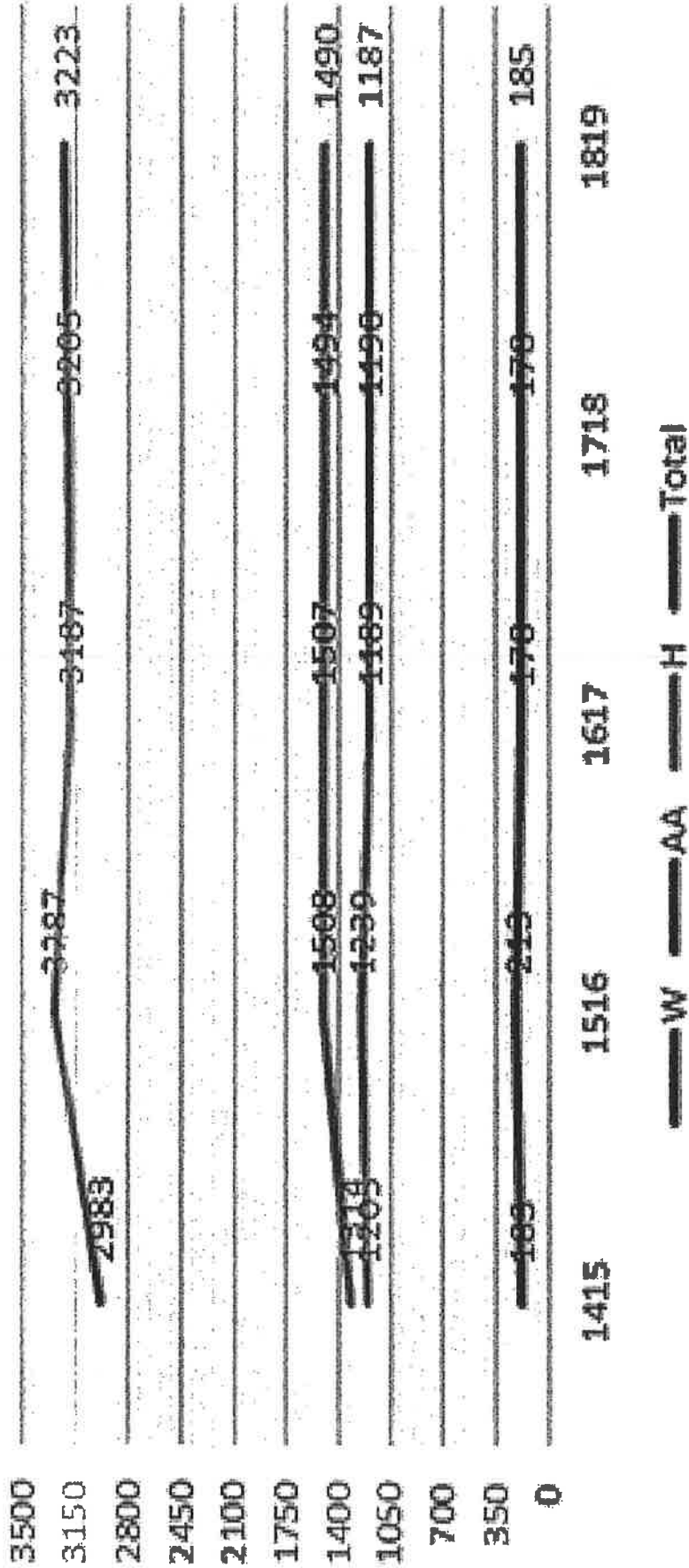




Dual Credit Enrollment



AP Enrollment by Ethnicity





Continued expansion of AVID

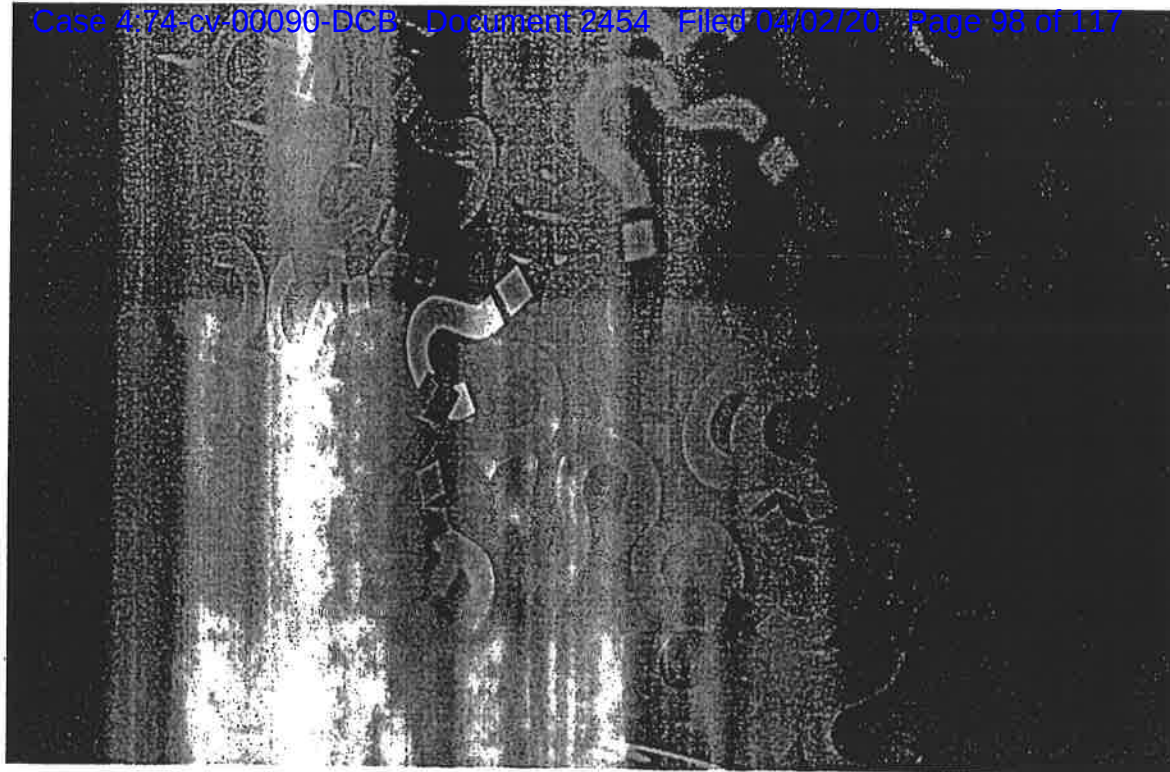


Expansion of AACs



Collaboration with AASSD and MASSD to identify strategies which will increase enrollment of African American and Hispanic students in ALEs.

Opportunities for Growth



Questions

UPDATE:
**AFRICAN AMERICAN STUDENT
SERVICES DEPARTMENT**

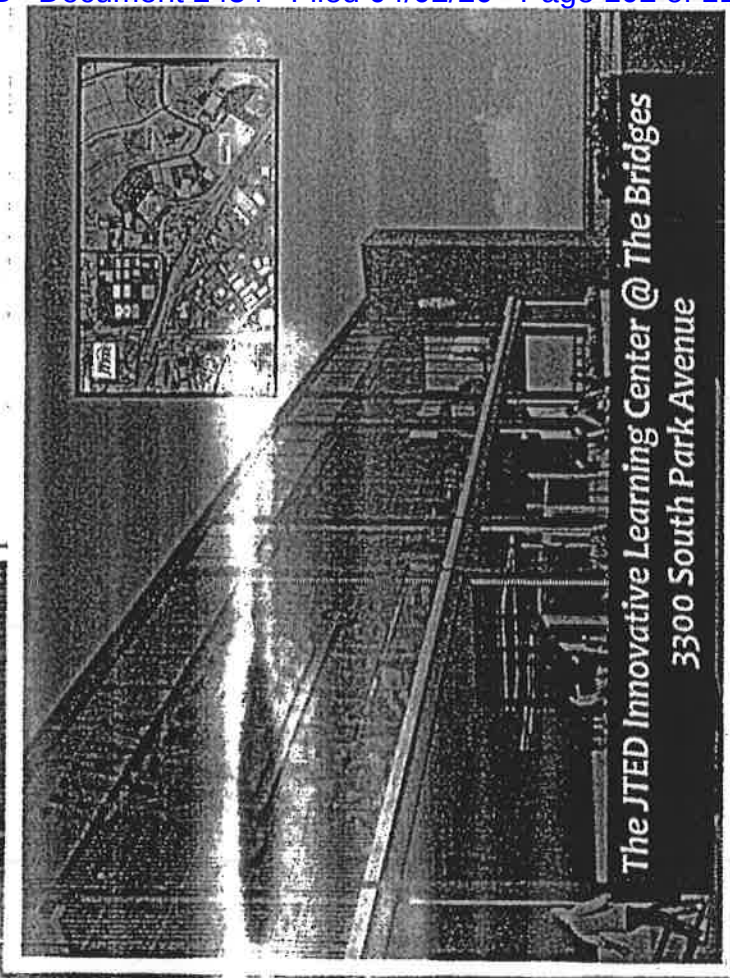
<p>2016-17 SM challenges budget for Student Success Specialists and entire dept'</p>	<p>January 2019 SM objects to the new plan</p>
<p>February 2018 Special Master Annual Report and Recommendations</p>	<p>February 2019 TUSD objects to SM recommendation</p>
<p>March - August 2018 TUSD (and Parties) Object to the Recommendation</p>	<p>April 2019 Court orders more revisions</p>
<p>September 2018 Court orders TUSD to submit another plan</p>	<p>August 2019 TUSD submits revised AASSD Operating plan</p>
<p>December 2018 TUSD submits AASSD Operating plan</p>	<p>October 2019 SM Reports Recommendation</p>
	<p>November 2019 Court Orders R&R</p>
	<p>December 2019 SM submits R&R</p>

UPDATE:

TUSD/PIMA JTED

CAREER AND TECH

HIGH SCHOOL @ THE BRIDGES



WHAT IS PIMA JTED?

The Pima Joint Technical Education District provides free career and technical education to high school students in Pima County. Students attend JTED classes at one of its central campuses, or at satellite locations throughout the County.

...of Pima JTED students go on to postsecondary training/college or enter the workforce.

- Students with a CTE-related degree or certification can earn up to \$20,000 more annually than those without CTE training.

WHAT IS THE NEW HIGH SCHOOL

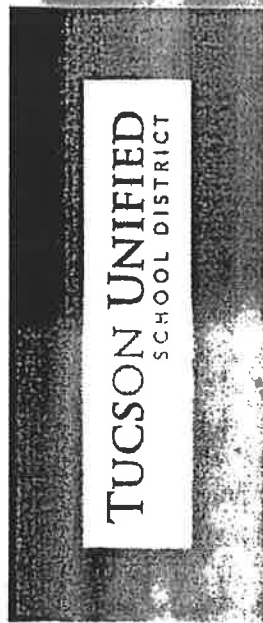
No-boundary, open-access high school

Approx. 400 students in first of three phases

TUSD (Core Classes) and Pima JTED (CTE Classes)

State-of-the-art classrooms and equipment

Earn industry certificates and credentials,
internships, externships, and college credit



NEW PROGRAMS

Business Administration, Business Analytics, Design
Business Administration, Business Analytics, Design

Business Administration, Business Analytics, Design, Optics, and AI

Business Administration/Entrepreneurship

Business Administration/International Arts/Restaurant Management

Engineering - Aerospace and Mining Technology

Health Care Foundations

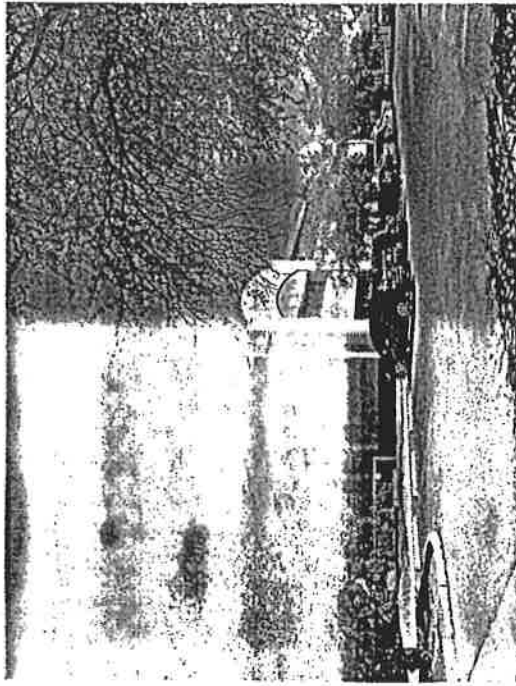
Licensed Nursing Assistant

Registered Medical Assistant

UPDATE:
RE-OPENING OF WAKEFIELD MS

Middle School Education:
A New Vision

WAKEFIELD MIDDLE SCHOOL



What is the proposal?

Re-open Wakefield
 with three key features:

1. Small Size
 - 400 STUDENTS OR LESS
2. Strong Partnerships
 - UNIVERSITY OF ARIZONA
 - HIGHER GROUND
 - COMMUNITY ORGANIZATIONS
3. Unique Learning Environment
 - LABORATORY SCHOOL
 - SOCIAL-EMOTIONAL LEARNING
 - ADVANCED LEARNING EXPERIENTIAL
 - AFTER-SCHOOL PROGRAMS



What are the key objectives:

DIVERSITY

GREAT TEACHING AND IMPACTFUL LEARNING

IMPROVE ALE PIPELINE



 Middle School Education:
A New Vision

WAKEFIELD MIDDLE SCHOOL

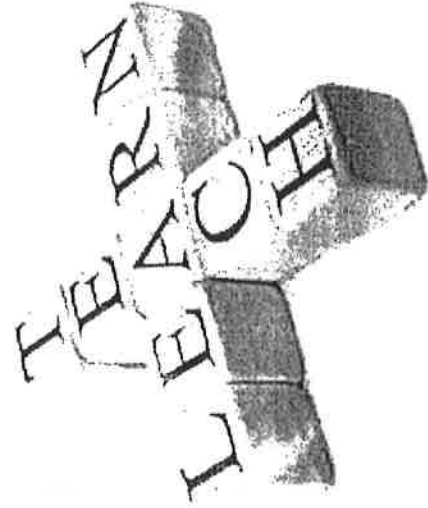


How will we achieve a diverse student population in a racially concentrated area?

- No-Boundary School
- Express Bus
- Modified Lottery
- Targeted Marketing, Outreach, and Recruitment



How will we provide great teaching and impactful learning?



- Master Teachers
- Embedded Professional Learning for Student Teachers
- Small class sizes, small-group, one-on-one instruction



How will we improve the ALE pipeline?

- Strengthen options between ES GATE and HS programs (UHS, Cholla IB, Pueblo College Prep)
- Prepare students for success at TUSD HS ALE programs
- Utilize a modified lottery to increase cohorts of traditionally underserved students at UHS, particularly African American students

Middle School Education: Partnership with Community & U of A
A New Vision

Lab School – Learning at All Levels



Student
Teachers

STUDENTS



TUCSON UNIFIED
SCHOOL DISTRICT



African American Student Services

Jimmy Hart, Director

African American Student Achievement Desegregation Updates

**There is great power in harmony and
mutual understanding.**



Vision Mission & Values

Vision

We will work to ensure African American Students receive a quality education and are prepared to succeed in a global society.

Mission

Fostering success through Academics, Advocacy and Collaboration, Empowerment, Equity, and Intervention.

Core Values

Advocacy • Integrity • Empowerment •
Teamwork

Graduation
... graduation at targeted

... site coun...

... advanced learning experiences (ALE) by 10% from SY18-19.

... reduce suspensions and disproportionate discipline by 10% from SY18-19.

Achievement
• Work with schools to reduce failure rates by 10% from SY18-19.

Organizational Structure for Student Support



Staff SY18-19 = 14 FTE

Staff SY19-20 = 13 FTE

Staff with a B.A./B.S. SY18-19 = 50%

Staff with a B.A./B.S. SY19-20 = 100%

Masters degree = 8

Program Specialists

- Shermaine Fort: Discipline and Restorative Practices
- Kyra Harris: College and Career Readiness
- Katrina Messing: Advanced Learning Experiences (ALE)
- Jeff Sawyer: Family and Community Engagement

- Braswell Chappelle: Booth-Fickett K8, Secrist MS, Palo Verde HS
- Joseph Clark: Gridley MS, Magee MS, Sahuaro HS
- Amy Gile: Roberts-Naylor K8, Vail MS, Rincon HS
- Richard Langford: Safford K8, Tucson Magnet HS
- Zander Tsadwa: Doolen MS, Catalina HS

- Marissa Bell (district-wide)
- Eric Emerson (district-wide)

Response to Intervention (RTI) Specialists

- Grace Delajoux: Blenman ES, Erickson ES (ELA)
- Robin Marks: Doolen MS, Utterback MS (Math)
- Kevra Rich: Booth-Fickett K8, Diez K8 (ELA)
- TBD: (ELA)

Program Coordinator

- Wendell Jones

Administrative Assistant

- Christina Chapa

Director

- Jimmy Hart

Program Specialists



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Advanced Learning Experience (ALE)
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College and Career Readiness
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Shermaine Fort
Restorative Practices and Discipline
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Shermaine.Fort@tusdl.org



Jeff Sawyer
Community Engagement and Outreach
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