

EXHIBIT A

DECLARATION OF HALLEY FREITAS

I, Halley Freitas, declare under penalty of perjury that the following statements are true:

1. I am the Senior Director for Assessment and Evaluation for the Tucson Unified School District and have held this position since 2015. I have personal knowledge of the facts stated herein.

2. I have reviewed Booth-Fickett’s recent academic achievement data, specifically, its quarterly benchmark assessment data.

3. The District’s benchmark assessments show a strong correlation to the AzMERIT exam. Between SY2018-19 and SY2019-20, Booth-Fickett has made gains in both Math and ELA proficiency on student benchmark assessments, as shown in the chart below

	2018-19		2019-20	
	Booth Fickett	District	Booth Fickett	District
ELA Q3 ¹	34%	37%	39%	36%
Math Q3	27%	36%	39%	37%

4. Due to the COVID-19 pandemic, no Arizona students took the AzMERIT state assessment for SY2019-20.

5. It is my opinion, based on modeling of the SY2019-20 third quarter benchmark data to serve as a proxy for AzMERIT scores (and a reasonable projection of growth, acceleration, and ELL scores), that had Booth-Fickett students taken the 2019-20 AzMERIT exam, it is quite probable that Booth-Fickett would have earned a “C” letter grade or better.

6. In SY2016-17, Booth-Fickett was only a half of a point from a “C” state letter grade. In SY2017-18 and SY2018-19 it earned a “D” letter grade. Because it earned

¹ Due to adjustments made because of COVID-19, Q3 data is the most recent quarterly data available for year-over-year comparison.

1 a “D” for three years in a row, it was automatically labeled an “F” school, not having
2 experienced growth similar to what it experienced in SY2019-20. Statistically, Booth-
3 Fickett has performed like a “C” school for two of the past four years (SY2016-17 and
4 SY2019-20), even though it now carries an “F” letter grade.

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

7 DATED this 17th day of June, 2020.

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Halley Freitas

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