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 12 *Tucson Unified School District No. 1*

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

15 Roy and Josie Fisher, et al., Plaintiffs,	4:74-cv-0090-DCB (Lead Case)
16 v.	
17 Tucson Unified School District No. 1, et al., Defendants.	
18 Maria Mendoza, et al., Plaintiffs,	4:74-cv-0204 TUC DCB (Consolidated Case)
19 v.	
20 Tucson Unified School District No. 1, et al., Defendants.	

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 23 **SECOND SUPPLEMENTAL NOTICE AND REPORT OF COMPLIANCE**
 24 **(ECF 2486)**
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1 Subject to and without waiving its objections previously stated and referenced
2 herein, the District hereby provides notice of compliance with the Court’s order entered
3 on June 4, 2020 (ECF 2471), as amended by the Court’s order entered on June 22, 2020
4 (ECF 2486). This notice is only partial, as the District has not yet completed the academic
5 improvement plans. The District has separately filed herewith a request for additional
6 time to complete the academic improvement plans.

7 **I. MAGNET SCHOOLS.**

8 **A. Revised Comprehensive Magnet Plan.** Pursuant to the Court’s directive,
9 the District has revised its Comprehensive Magnet Plan in the manner set out in the
10 Court’s orders. A revised version of the Comprehensive Magnet Plan, including the
11 original Outreach and Recruitment Addendum (previously filed as ECF 2270-5) is
12 attached as Exhibit A.

13 The revised CMP includes an updated definition of integration and updated
14 academic criteria on page 6. On page 7 the District added language to confirm that
15 magnet schools needing Level C support and monitoring shall include any Racially
16 Concentrated school or school that is not Integrated. The District updated the timelines
17 for targeted integration improvement plans (page 10) and updated the timelines for
18 targeted academic improvement plans and added a new section B.6 related to
19 modification of a magnet theme or program (page 14). On pages 15-16, the District
20 updated section C, “Eliminating Magnet Programs” to align the updated timelines for
21 targeted plan and transition plan implementation, transition status, and to confirm that
22 mitigating factors are more appropriately considered by the School Board, with the
23 recommendation for termination to be made in accordance with the CMP, simultaneously

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1 with the implementation of a Transition Plan. The District also realigned the sub-header
2 references to match the table of contents.

3 **B. Targeted Integration Improvement Plan.** As noted in the District’s
4 Supplemental Notice of Compliance (ECF 2501), of the thirteen District magnet schools,
5 only one does not meet the applicable integration criteria: Roskruge Bilingual K-8
6 Magnet School. Pursuant to the Court’s order, the District has prepared a Targeted
7 Integration Improvement Plan, which is being implemented at Roskruge. A copy of that
8 Targeted Integration Improvement Plan is attached as Exhibit B.¹

9 **C. Magnet Project Priorities Plan.** Pursuant to the Court’s directive, the
10 District has prepared a Magnet Priorities Project Plan, including an outline of its most
11 recent new magnet assessment and strategy, priorities, and timelines. The Magnet Project
12 Priorities Plan, including its Attachment A, Magnet Study, is attached as Exhibit C. The
13 2018-19 Magnet Study was previously filed as ECF 2270-1, “Study of TUSD Schools to
14 Identify Potential Magnet Schools and Themes.”

15 **II. OTHER SCHOOLS.**

16 **A. Non-Magnet Project Priorities Plan.** The Court directed the District to
17 prioritize by year its planned improvements over the next three years, plus, for non-
18 magnet schools. The District has prepared its Non-Magnet Project Priorities Plan, a copy
19 of which is attached hereto as Exhibit D. The Non-Magnet Project Priorities Plan
20 prioritizes the implementation of Student Academic Action Plans for 17 non-magnet
21 schools receiving a letter grade of D or F for the 18-19 academic year. Although the

22 ¹ As noted in the District’s Supplemental Notice of Compliance (ECF 2501), of
23 the thirteen District magnet schools, three did not meet applicable academic criteria: Tully
24 Elementary Magnet School, Booth-Fickett Math/Science Magnet School, and Palo Verde
25 High Magnet School. The Targeted Academic Improvement Plans for these schools are
not yet complete, and the District has separately filed herewith a request for an additional
30 days to complete these plans.

1 District has worked hard to develop and complete student achievement action plans for
2 these schools, including multiple meetings with the consultant recommended by the
3 Special Master, the Student Achievement Academic Improvement Plans for these schools
4 are not yet complete. The District has separately filed herewith a request for an additional
5 30 days to complete these plans.

6 **B. Integration Improvement Action Plans.** The Court directed the District
7 to prepare Integration Improvement Action Plans for certain identified schools (ECF
8 2486, p. 6). In addition, in its order on ALE issues (ECF 2474), the Court directed the
9 District to prepare an Integration Improvement Action Plan for Cholla High School,
10 which operates the District IB Programme, and for University High School. The District
11 has prepared these plans, and they are attached hereto as Exhibit E.

12 **C. Revised Transportation Plan.**

13 In its order on ALE issues (ECF 2474), the Court directed the District to revise its
14 Transportation Plan to include transportation provided pursuant to ALE programs. The
15 District revised the Transportation Plan as directed, and filed it with the Court (ECF
16 2500-2). The integration plans filed herewith included additional shuttle or express
17 buses, and the District has accordingly revised the Transportation Plan again to include
18 the transportation components of the integrations plans. The current revised version of
19 the Transportation Plan is attached hereto as Exhibit F.²

21 ² As noted at the outset of this Notice, the District is complying with the orders at issue
22 subject to and without waiving its general objections set out in previously filed documents,
23 incorporated herein by reference. These include in particular, but are not limited to, its
24 objection to the Special Master's 2018 Report and Recommendation (ECF 2099), its
25 Supplemental Petition for Unitary Status (ECF 2460 and 2464), its objection to the Special
Master's Report and Recommendation (ECF 2477), and its motion for reconsideration of
the Court's order dated June 4, 2020 (ECF 2481), and its request for limited relief from the
Court's ALE order (ECF 2500).

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DATED this 1st day of September, 2020.

Respectfully submitted,

/s/ P. Bruce Converse
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CERTIFICATE OF SERVICE

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I hereby certify that on the 1st day of September, 2020, I electronically transmitted the attached foregoing document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to all CM/ECF registrants.

/s/ P. Bruce Converse