



State of Arizona
Department of Education
Office of John Huppenthal
Superintendent of Public Instruction

June 8, 2011

Ms. Debra K. Davenport, CPA, CGFM, CFE
Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, AZ 85010

Dear Ms. Davenport:

The Arizona Department of Education is providing the enclosed response to the Auditor General's revised report entitled "Arizona's English Language Learner Programs, Fiscal Year 2010."

We appreciate your cooperation with the process involved in the completion of this report. We acknowledge your consideration of our comments and suggestions during the course of your work.

Please feel free to contact our office if additional information is required in the completion of the report.

Sincerely,

John Huppenthal
Superintendent of Public Instruction
Arizona Department of Education



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ADE Responses Regarding Recommendations

Recommendation 1

As ADE continues its monitoring of district ELL program implementation, it should report noncompliant districts in continuing corrective action status to the Board for possible withholding of SEI funds.

ADE Response

The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented.

The school year 2010-2011 marks the end of the third year of implementation of the Structured English Immersion (SEI) Models. As this is the second year of identifying chronic non-compliant districts, this is the appropriate time to begin to report to the State Board of Education (SBOE). The Office of English Language Acquisition Services (OELAS) has been working on the development of criteria for the identification of districts or charters to be referred to the State Board of Education for a finding of non-compliance pursuant to A.R.S. § 15.756.08 (J). The criteria will be based on the required components of the SEI program including:

- Four (4) daily hours of English Language Development (ELD)
- Proper ELL student grouping
- Highly qualified teachers with SEI endorsements
- English language development instructional components covered

OELAS is going forward with the above-listed criteria, identifying non-compliant districts pursuant to A.R.S. § 15.756.08 (J) and will begin reporting these at the September 2011 State Board meeting.

Recommendation 2

- 1. To improve ADE's assessment of districts' implementation of the SEI Models, ADE should continue to work with districts to:**
 - a) Improve the reliability of the program participation data, including ELL students' eligibility and participation dates, and the type of program provided to each student;**
 - b) Collect additional information related to program participation, including the number of English language development hours provided to each student by program type; and**
 - c) Consider collecting additional information that links student outcomes to instructional quality, such as information on teachers.**

ADE Response

- a) The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented in the 2011-2012 school year, through Practitioners of English Language Learning (PELL) meetings, summer trainings, and through the annual OELAS Conference.
- b). The recommendation of the Auditor General is agreed to and the audit recommendation will be implemented beginning in the 2011-2012 school year when OELAS will be working with IT to improve data collection.
- c). ADE agrees to consider the collection of additional information that links student outcomes to instructional quality, such as information on teachers. At its April 25, 2011 meeting, the State Board of Education adopted the “Arizona Framework for Measuring Educator Effectiveness” framework based on the Teacher Accountability Task Force recommendation. ADE/OELAS will utilize this framework in the collection of this additional information when fully implemented.

ADE General Comments

Relevant to the Arizona English Language Learner Assessment (AZELLA), the Arizona Department of Education (ADE) is confident that this test is a valid and reliable measure of English language proficiency. This statement is supported in both the AZELLA Form AZ-1 and AZ-2 Technical Reports. Based on the rationale and purpose referenced in this document [p. 9 for (AZ-2)] the AZELLA performance has been analyzed based on *The Standards for Educational and Psychological Testing*, and is considered to be valid and reliable. The 2009-2010 AZELLA Form AZ-2 Technical Report issued in February 2011 was authored by Pearson Psychometric and Research Services, a unit of NCS Pearson, Inc.

As ADE assessments are always in the mode of continual improvement, the AZELLA is undergoing scheduled review and revision. A Request for Proposals (RFP) was issued in early spring of 2011 and is scheduled for award in June 2011. Although AZELLA data has been carefully analyzed in the past, the new test offers an opportunity for additional studies to confirm the assessment’s reliability and validity.