

## **ACHIEVEMENT TARGETS AND GOALS**

**Plaintiffs and Defendant agree on the overall achievement goals set forth in the Consent Decree.**

- Seek to eliminate unwarranted disparities in the enrollment of minority students in upper level courses.
- Implement innovative, interactive, research-based curriculum and instructional practices that take into account students' diverse learning styles and provide training to teachers in such practices.

**The District asserts its flexible targets are the following:**

- The District's third grade students will be able to read at grade level by the 2003-2004 academic year.
- The District's students will gain at least one grade level each academic year, as measured by standardized tests for math and reading.
- The District's students enrolled in advanced core classes will be within racial fairness guidelines at each grade level in each school.
- By the 2003-2004 school year, the District's course outcome and grade distribution for all students will approximate and be proportional to racial fairness guidelines.
- In accordance with state and federal requirements, the District's students will have access to all programs within the District.

## ACHIEVEMENT TARGETS AND GOALS

Plaintiffs disagree that the flexible targets set forth by Defendant represent all such targets. The EEIP further provides with respect to student achievement that:

- The District's objective is to ensure that teachers receive training in, and implement, "Best Practices" in their classrooms by the start of the 2002-03 school year.
- The District's objective is to incorporate "Best Practices" strategies and curriculum into all classrooms, not just self-contained gifted classrooms.
- The District's objective is to ensure that curriculum and instructional methods take into account students' diverse learning styles so they feel welcome in all District schools.

Defendant fails to acknowledge its continuing obligations with respect to the curriculum and instruction aspect of student assignment targets.

The District states that it "meets its target to align and implement innovative, interactive, research-based curriculum and instructional practices." (Def.Br.5) By the terms of the "flexible targets," however, the District has a continuing obligation to use "best practices" until the expiration of the Consent Decree.

Plaintiffs propose that the Defendant's statement of goals and targets include its acknowledgment that the District is under a continuing obligation to find and implement best practices with respect to curriculum and instruction.

# ACHIEVEMENT

## THE DISTRICT'S REPORT

For several proposed programs, Plaintiffs have expressed concerns that the programs are ineffective, insufficiently detailed, or present other possible issues.

- This year “target middle and high school students for improved academic success” and “plan an infusion of support for students to accelerate academic achievement.”

*The plan does not set forth any “actions” or procedural steps, nor any accountability measures. It calls for the development of another “plan” for the infusion of academic support to African American students, without reference to any date for the completion of such academic support plan, any interim steps for its development, or any specific measures and accountability safeguards.*

- **“Continue an array of programs and initiatives identified in Exhibit G...”**

*While Plaintiffs appreciate the value of such an account in providing a context for specific, date-driven actions, it is no substitution for them. This “plan” does not set any time-table for accomplishment of targets, whether interim or final, nor does it identify who is to be held accountable for the outcomes flowing from the programs and initiatives and how they are to be held accountable. In fact, Exhibit G does not even give separate treatment for those programs and initiatives which are past, completed actions, and those that are currently ongoing.*

- **Continue holding meetings quarterly with MS and HS principals “to evaluate students’ progress,” continue formal program evaluations (STEP); and continue holding monthly meetings at which principals share “how they use data to monitor student performance.”**

*The District’s plan does not link any specific flexible targets for student achievement to these monitoring and evaluation measures, nor does it specify expected outcomes and assignment of responsibility.*

- **The Deputy Superintendent “will continue to monitor implementation of the action steps and analyze the outcomes and trends.”**

*The District’s plan does not link specific flexible targets for student achievement to this goal, nor does it show who the Deputy Superintendent “will... [hold] accountable” for implementation of action steps, outcomes, and trends.*

# ACHIEVEMENT

## THE DISTRICT'S REPORT

For several proposed programs, Plaintiffs have expressed concerns that the programs are ineffective, insufficiently detailed, or present other possible issues.

- Continue the monitoring of “Directors, Curriculum Coordinators, Principals, Content Area and Building Content Leaders” by “their supervisor[s] for compliance with established timeframes and procedures.”

*The plan does not set forth any “actions” or procedural steps, nor any accountability measures. It calls for the development of another “plan” for the infusion of academic support to African American students, without reference to any date for the completion of such academic support plan, any interim steps for its development, or any specific measures and accountability safeguards.*

- Continue having “[p]rincipals monitor teachers’ implementation of programs...”, including having teachers “bring disaggregated reports for discussion and review.”

*The District’s plan for building-level accountability does not link targeted outcomes to assignment of responsibility, nor does it specify how principals hold teachers accountable.*

- Continue holding “principals and campus level administrators” accountable for improved student achievement through the evaluation process.”

*The District’s plan for building-level accountability does not specify how principals and campus level administrators are held accountable through these evaluations (i.e., to what extent these evaluations have consequences, and more specifically, to what extent, if any, outcomes in student achievement related areas have consequences).*

- Use ISAT scores, AYP status, and school awards as measures of success in reaching student achievement goals.

*Plaintiffs agree that ISAT scores are one valid measure of District progress in improving minority student achievement, but disagree that AYP status and school awards are valid measures.*

# ACHIEVEMENT

## PLAINTIFFS' PROPOSED PROCEDURAL STEPS

- Articulate sufficient checks to determine (1) if teachers and building level administrators are adhering to the processes linked with improving student achievement, (2) are adhering to those processes at appropriate intervals, and (3) are adhering to the processes with appropriate detail.

*The purpose of Plaintiffs' plan is to increase and monitor, at the building level, fidelity to student achievement measures.*

- For the middle and high schools, set-out a time-line to develop and implement strategies and interventions, including (1) remediation/acceleration measures for students currently not at grade level for reading and math, and (2) provision for the enhancement of, or addition to, credit recovery opportunities for students who are behind in credits.

*The purpose of Plaintiffs' plan is to set-out specific measures for middle and high school African American students for the improvement of student grades and learning.*

- In every quarterly report, provide Level III grade distribution data in a form which breaks down the Level III grades into AVID and non-AVID students.

*Plaintiffs' plan provides for a breakdown of Level III data by AVID and non-AVID students for the purpose of evaluating the effectiveness of AVID in preparing students for upper level courses.*

- Plaintiffs propose the District adopt and implement a Level III plan similar to the Freeport, IL model provided to the District on September 6, 2006.

# ENROLLMENT AND ATTENDANCE TARGETS AND GOALS

**Plaintiffs and Defendant agree on one attendance goal.**

- The parties agree the District's student attendance rate at each school will be at least 95% for both minorities and nonminorities. (Def. Br. 6; EEIP 8). Plaintiffs believe the second goal is to ensure that curriculum and instructional methods take into account students' diverse learning styles so they feel welcome in all District Schools (EEIP 8).

**Plaintiffs and Defendant agree on the enrollment goal.**

- Within Controlled Choice framework, +/- 15% at each elementary and middle school.

# ENROLLMENT AND ATTENDANCE

## THE DISTRICT'S REPORT

The following programs, presented as action items in the District's Report, have either been proposed or have been in place for years.

- Continuation of Attendance Task Force
- Continuation of TAOEP

*Neither the Attendance Task Force nor the TAOEP program has been demonstrably effective in improving attendance numbers for African American students.*

# ENROLLMENT AND ATTENDANCE

## THE DISTRICT'S REPORT

Plaintiffs believe the following new steps for the District will not sufficiently address attendance, drop-out, and graduation rate issues.

- Attendance data to be entered weekly.
- Weekly Student Service Meetings at middle and high school campuses with principal, social workers, counselors, and attendance specialists.
- Analysis of attendance data every two weeks.
- Monthly Administrator of Special Projects meetings with middle and high school administrators and every other month with elementary administrators to review attendance efforts.
- Attendance will be included as a standing item at monthly principal meetings.
- Additional steps presented in Defendant's Exhibit I.

# ENROLLMENT AND ATTENDANCE PLAINTIFFS' PROPOSED PROCEDURAL STEPS

Plaintiffs have proposed additional steps they believe the District must undertake to improve attendance levels. Clear interim goals must be set forth now to ensure progress and accountability.

- For each school, reduce attendance disparities by one third for SY2007, SY2008, and SY2009 until the 95% attendance rate is obtained.
- Develop a procedure for monitoring interventions for absences below the threshold for disciplinary action.

*Addressing attendance problems before they become a crisis will concretely improve the District's attendance numbers.*

- Develop a broad attendance initiative that reaches beyond the TAOEP students.
- Utilize the Family Information Center staff to better address attendance problems.
- Create an education focus for attendance, “preaching” the theme of “attendance increases achievement” to students, staff, parents, and the community.

*The District must stress the importance of attendance at every turn. Again, Plaintiffs are willing to collaborate on strategies to ensure community permeation of this message.*

- Develop a Houston, TX-type program to increase attendance for African American students in schools.

# GIFTED AND TALENTED TARGETS AND GOALS

**Plaintiffs and Defendant agree on the overall gifted and talented goals as set forth in the Consent Decree.**

- Seek to eliminate, to the greatest extent practicable, unwarranted disparities in the assignment of minority students to gifted programs and to operate such programs in an educationally sound and non-discriminatory manner.

**Plaintiffs and Defendant disagree on the precise construction of the District's "target."**

*Defendant proposes:*

- Without respect to enrollment at any particular school, achieve, as a measure at the district-wide level, +/-15% enrollment of African American students in gifted/talented programs.

*Plaintiffs believe this target is more properly described as follows:*

- In each school, achieve, to the greatest extent practicable within the +/-15% racial fairness guidelines, African American enrollment in gifted and talented programs.

# GIFTED AND TALENTED THE DISTRICT'S REPORT

For several proposed programs, Plaintiffs have expressed concerns that the programs are ineffective, insufficiently detailed, or present other possible issues.

- Codify “this year” equity related gifted policies and procedures.
- As part of the codification of gifted policies and procedures “this year”, include in written documents “specific assignment of responsibilities at the campus level”.

*Defendants' Report does not set specific dates of completion for these plans.*

- **Continue staff development regarding giftedness.**

*District's plan does not include staff development measures for campus administrators.*

- **“Heighten focus this year” with respect to tracking the effectiveness of enrichment programs through ISAT scores.**

*Defendant's plan does not explain what it means by “heightened] focus”; it does not set a specific target date for the completion of this goal; it does not include in its goal the collection and reporting of ISAT scores for students enrolled in self-contained gifted programs; and it does not provide for reporting of scores on a school-by-school basis.*