

Honorable Members of the Board of Education C/O Tonia Norman, Educational Services Center - 1 15701 E. First Ave. Suite 206 Aurora, CO 80011

March 14, 2016

Dear Aurora Board of Education,

We write you today to once again offer our insight into the innovation plans that are up for your approval at the March 15th board meeting and to convey our concerns regarding the path forward for Aurora Central. Our commitment to effective turnaround strategies invests us in the Aurora Public Schools innovation ACTION Zone. We hope the information contained in this letter, and the analysis of the school plans helps guide your thinking as you determine whether or not to approve these plans. School turnaround is a difficult process and, while there are some promising signs in the plans, there are also serious concerns.

As you may know, we have been closely following the ACTION Zone by attending Zone Design Team meetings, board meetings, and the community meeting where plans were presented to the public. At the last school board meeting we were pleased to hear you echo some of our concerns with the plans including:

- The lack of a clearly outlined leadership plan—while the district has included a brief description of the structures of leadership support that will be provided to school leaders, it does not fully describe the key competencies, evaluation process, coaching process, or the school specific job description that school leaders will need to fulfill in order to successfully lead these innovation plans. School leadership is one of the most important parts of school turnaround and to have an ill-defined understanding of turnaround leadership will not support successful implementation of these plans.
- Concerns about budgeting—the plans do not make it clear how schools plan to use the resources available to them to hire the new staff or create the new structures laid out in the plans.
- Absence of named curricular resources in most plans—the plans point to a need for curricular changes to both increase student achievement and to align more closely with the international leadership theme. With a few exceptions, however, the plans fail to name which curricular resources schools will use to meet these goals.

All three of these concerns remain largely unaddressed. But, upon reading the finalized versions of the plans, we are happy to see that some of our early concerns have been addressed and the scorecards reflect our analysis of the most current plans. While the plans do lack some very important details, we do believe that these plans would benefit students attending Boston, Paris, and Crawford particularly if the district works to support the schools in addressing these challenges.

The crux of our concern regarding Aurora Public Schools' innovation zone is the plan presented by Aurora Central High School. Central is one of the lowest performing high schools in the state and is entering its fifth year on the accountability clock, as such Central's plans must be viewed through the lens of school turnaround. School turnaround planning involves more stringent requirements than school innovation



planning. In order to transform a school at Central's level of persistent failure, turnaround planning must reflect a rigorous examination and detailed account of the root causes of failure and research-based methods for transforming the school.

Many factors play into our analysis that Central's plan falls short of the mark necessary to create dramatic improvements in student achievement.

- The plan lacks coherent, research-based structures and strategies for school turnaround.
- The focus on moving the school from a traditional comprehensive high school to a "competency-based" based school with an entirely new set of structures and practices will require an enormous level of staff capacity. We know of no similar large low-performing school in the country that has successfully implemented a similar model.
- Aurora Public Schools have not identified the school's turnaround leader—it is best practice to allow a turnaround leader a zero-year to engage in planning and lay the groundwork for implementing school turnaround. At the other three schools in the zone, the current leader will be continuing their innovation work next year. The district is in the process of seeking a new leader for Central who will, theoretically, be tasked with enacting plans they had no hand in creating.
- The plan does not cite compelling research to prove that it is possible to turn around such a large, comprehensive high school with the urgency that Aurora Central students deserve.
- It is unclear how—in terms of budget, talent, and resources—Central will be able to effectively enact the plans.

Currently, we are not confident that enacting the plan presented by Aurora Central will have a positive impact on student achievement at Aurora Central. Clearly the district needs to act with urgency, but enacting an ineffective plan will not serve students.

We want to leave you with a final question: to what extent will students coming out of the improved feeder schools (Boston, Crawford, and Paris) be served by Central High School? The Central innovation plan is not a roadmap for school turnaround. It lacks detail and postpones much of the decision-making to next year. Rather than pass this plan, you have the opportunity to carve out space for more options for APS students such as making a call for new schools or offering space to high-performing charter networks that have demonstrated effectiveness in communities like Aurora. There are many paths forward for Aurora Central High School that have the capacity to be more impactful that following Central's current innovation plan. We suggest that the board weigh those options before making a final decision.

Sincerely,

Jesus Salazar, Co-Chair

A+ Colorado

Mary Gittings Cronin, Co-Chair

Mary Suttings Fronin

A+ Colorado

Van Schoales, CEO A+ Colorado



ACTION Zone 1 Data at a Glance

School Demographic Data¹

School Name	American Indian or Alaskan Native	Asian	Black or African American	Hispanic or Latino	White	Native Hawaiian or Other Pacific Islander	Two or More Races	Total # of Students
Aurora Central High School	1%	10%	16%	67%	4%	0%	2%	2172
Boston K-8 School	0%	15%	14%	67%	1%	0%	2%	405
Crawford Elementary School	1%	24%	14%	56%	4%	0%	1%	668
Paris Elementary School	1%	3%	18%	72%	2%	1%	3%	462

The schools in ACTION Zone 1 primary serve students of color. The innovation plans developed by the schools mention the ethnically diverse communities, large refugee populations, and the low socioeconomic status of their student population. Additionally, English Language Learners make up the majority of all five schools' populations.

State Testing Data²

		Elementary Schools		Middle School	High School
	Paris Elementary Percentile Rank	Crawford Elementary Percentile Rank	Boston Elementary Percentile Rank	Boston Middle Percentile Rank	Aurora Central Percentile Rank
Reading					
TCAP 2014	1	1	1	1	2
CMAS PARCC					
2015	1	1	1	3	1
Writing					
TCAP 2014	1	1	3	1	2
CMAS PARCC					
2015	1	1	1	3	1
Math					
TCAP 2014	1	6	2	1	2
CMAS PARCC					
2015	1	8	1	5	1

The Colorado Department of Education's Accountability Team calculated the percentile rank based on the school's mean scale score. Percentiles are a comparative rank based on all schools tested where a school in the 1st percentile was outperformed by 99% of schools tested, and a school in the 99th percentile outperformed 99% of schools tested. The mean scale score is the average score of all students tested in a particular school.³

http://www.cde.state.co.us/accountability/achievement_percentile_rank_report_guidance_document

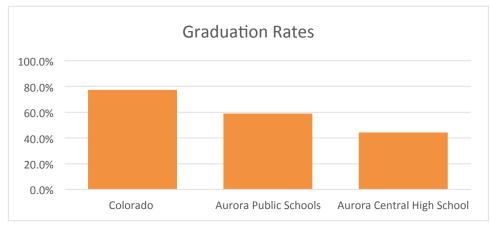
¹ Colorado Department of Education

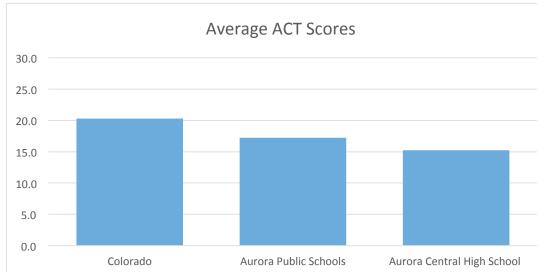
² School Percentile Rank Reports from http://www.cde.state.co.us/schoolview/performance

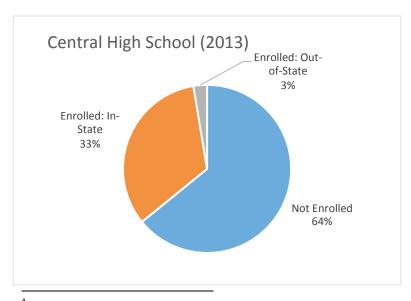
³ For additional information about CDE's methodology see:



High School Performance⁴







 $^{^4\, {\}tt Colorado\, Department\, of\, Education\, and\, http://highered.colorado.gov/Data/DistrictHSSummary.aspx}$



Aurora Central High School Score Card

School Name: Aurora Central High School Grades: 9-12 Students: 2,172

Mission: The current mission of the school is: "ACHS seeks to teach students in a safe, supportive environment the knowledge, skills, values, and behaviors necessary to become responsible and productive members of a diverse society. The staff provides instruction in all subject areas, focusing on enabling students to demonstrate effective communications through reading, writing, speaking, listening, reasoning and technology literacy." The school is deferring establishing a new mission and vision until after the innovation plan is adopted.

Plan Overview: The school plans to phase-in a competency-based learning model over the next three years. The competency model will draw from Colorado Academic Standards and Global Competencies (from the ISSN) to map learning expectations for students over time. The plan includes fundamental changes to the school day schedule, student assessment approach and strategies for both student and parent engagement. Teachers would move to annual contracts in the plan. While the school intends to develop many new components of its program, these components have not yet been developed and thus the quality of the program can not be fully assessed. For example, the following essential systems and structures have not yet been fully designed or developed:

- 1) tools, frameworks and criteria to evaluate teachers in lieu of the current system,
- 2) a professional development calendar for pre-service and intra-year PD that explains when, how and who will deliver PD
- 3) formative assessments to track student progress through the competency scales,
- 4) specific teacher recruitment plan to find and hire staff qualified in a competency-based instructional model that serves at risk students, and/or unique job descriptions that will be used in such a recruitment strategy
- 5) research based rewards and incentives for student attendance, etc.)

Plan Component	Evidence of Strengths and Weaknesses in the Plan (key notes emboldened)
Leadership A committed, experienced school leader is a critical component of a successful school turnaround. School leadership must be effectively trained,	 The Action Zone application describes revisions to the hiring process for principals within APS and for Aurora Central specifically; APS plans to hire a leader who can implement the International Leadership theme, balance implementing the plan with addressing urgent needs, honor the process to-date and build a strong distributive leadership team The Action Zone application articulates an organizational structure to provide coaching to leaders that is consistent with the principles of effective school



coached, and evaluated throughout the turnaround.	leadership that the current leaders have gained through Relay GSE
	 The school has not yet identified a school leader to lead the school in 16-17 and the hiring criteria noted in the Action Zone application do not mention turnaround-specific competencies or experience with competency-based learning models The district has not yet identified the supervisor for the Aurora Central school leader (new position of Executive Director of Autonomous Schools) and thus it is not clear whether this person has experience with school turnaround or competency-based learning models The plan does not articulate the leadership team structure and thus it is not possible to determine whether sufficient capacity and expertise exists to coach teachers, conduct professional development and perform key instructional leadership functions for the school
Talent The difficulties of school turnaround require a high caliber staff. This entails clearly defined recruitment, hiring, and professional development (PD) processes.	 + The school plans to hire a dedicated recruitment specialist who will be tasked with creating a recruitment plan and ongoing strategy to interview and hire qualified staff + The plan states that the school is confident that they can assemble a team of teachers and staff to implement the competency-based model for the 9th grade in 16-17, though no details are provided to support this claim + Core teachers will have 1 hour and 50 minutes of planning time each day, split between House planning and content planning + Teachers will participate in professional development (PD) for approximately one day each month and an undetermined number of days in advance of the school year
	 There is not a detailed staffing plan for year one and beyond; it is not clear how all the learning modes will be staffed; for example, the plan suggests that 1:1 tutoring is delivered by teachers, community partners and other students who have shown mastery but tutoring does not appear in a sample student schedule and no details are provided about where community partners will come from or how they will be trained While the plan provides a bulleted list of 11 potential professional development topics, it does not identify who will lead the PD, which topics will be prioritized, how the time will be structured and/or how success will be measured over the course of the year None of the identified prospective PD topics cover aspects of the school culture

plan such as training teachers in restorative justice or positive behavior



incentive systems

- The school plans to roll out a new informal evaluation protocol for 16-17, but the protocol has not been developed, peer observers have not yet been trained and thus teachers do not yet know how they will be evaluated for next year and beyond
- The plan does not address how the new teacher evaluation model will work to align teacher effectiveness ratings with student outcomes; currently 97% of teachers are rated as effective or exemplary while only 8% of students in 9th grade are rated proficient in reading and 2% of students are rated proficient in Integrated Math I on PARCC in 2015
- The plan does not identify any interventions or adjustments to instruction for 10th, 11th & 12th graders in 16-17, suggesting that the school will continue to provide the existing model for these students until the new competency-based model is fully phased-in

Culture

School culture plays a critical role in the success of school turnaround.
School staff, students, and families must be invested in a school culture that drives achievement.

- + The school will introduce a Parent/Family Outreach Program that brings a pair of teachers together with a student and his/her family twice per year to build relationships between staff and families
- + The school will also introduce a parent volunteer program, one session of academic counseling and a culture fair all targeting enhanced parent engagement
- The advisory classes will provide an opportunity for each student to develop a customized post-secondary readiness plan that is revisited throughout their time at Central
- + The plan suggests that the phase-in approach of the House model and the additional collaborative planning time for teachers within the House structure will improve efficacy of the model as compared to prior implementation efforts
- The school intends for House teachers to regularly analyze and discuss student attendance to coordinate a teacher response, however the plan also notes that the school has not yet studied successful attendance models and policies in other schools, nor has the school developed a rewards and incentives structure to motivate attendance
- The plan notes that many students have one or more jobs outside of school, but the schedule does not introduce any flexibility for employed students
- The plan does not explain how students will be surveyed for input into rewards and incentive programs or for explanations as to root causes for chronic absenteeism or school drop out



Curriculum, Assessment,
Pedagogy
Effective school turnaround
plans include researchbased curriculum,
assessment, and
pedagogical practices.

- Having teachers unpack the academic standards into competencies and then create curriculum aligned to those competencies will build high degrees of expertise among successful teachers as to the academic standards
- + The school will continue to use a nationally normed interim assessment (NWEA MAP) to measure student progress in addition to teacher created assessments, however the MAP test is normed to a standard grade-level learning trajectory as opposed to a competency-based learning approach
- + The plan cites a study that shows a higher graduation rate among International Studies School Network programs of 89% and that indicates that ¾ of these schools outperform demographically similar schools on state assessments (n=35 schools in ISSN)
- Students will average 275 minutes (4 hrs 15 min) of learning time each day across the core content areas of Math, English Language Arts, Science, and Social Studies
- The plan suggests that teachers will be able to create common formative
 assessments or plan all learning activities for a given week in one hour
 (respectively) of common planning time; this does not appear to be sufficient
 time to do this work on behalf of 100-120 students with no pre-developed
 materials and with students that are moving at individualized paces through
 various levels of competency
- The school intends to adopt and customize the Asia Society's curricular framework to support teachers in developing their curriculum, however the district has announced that it will no longer partner with the ISSN in the 16-17 school year
- While the plan cites research supporting the ISSN approach (noted above), the demographics of the schools in the study included only 14% English Language Learners while Central has 70% English Language Learners and thus it is not clear whether this model can fully support the English Language Acquisition needs of the Central student population
- The plan notes that students who are behind will work to catch up during their individualized learning time and during enrichment time, however no supplementary resources are identified to guide this learning (eg., online course platforms, interventions, etc.) for students are coming in at a 5th grade level as measured by MAP in ELA and Math (noted at the beginning of the plan)
- It is not clear what will happen with students who fail to accumulate sufficient credits over multiple years

Strategic Use of Resources
The budgetary and

+ The plan includes a high-level multi-year budget



structural supports
provided by the district
must leave sufficient room
for schools to adhere to
their plans.

- The budget does not include key details such as the number of FTE's that are included in the provided figures and/or evidence for how these figures align to the staffing expectations outlined in the plan
- The plan identifies staffing changes related to introducing the House structure such as having a dedicated special education teacher, dean and counselor for each group of 100-120 students in addition to core teachers, but it is not clear whether the budget provides for these 3 additional FTE's for each House grouping over time (i.e., 51-60 total FTE's once the House structure covers 9th-12th grades)
- The plan outlines a number of key resource decisions that will be made at the school site, but does not address how the funding will be secured to support these decisions or how they will be sustainable over time



Boston Collegiate K-8 Scorecard

School Name: Boston Collegiate K-8 Grades: K-8 Students: 405

Mission: Boston plans to adopt the following mission and vision statement: "Boston is a unified, global community of lifelong learners who strive for excellence and compassion for self, each other, and our world."

Plan Overview: The school plans to introduce thematic units that integrate learning across multiple content areas and that support students in project-based learning. The school's plan expands on the strategic priorities identified in their recent Tiered Intervention Grant: (1) strong observation and feedback cycles for teachers, (2) data-driven instruction and (3) building a positive learning-centered school culture. The school seeks to become a "community hub" and has a number of strategies to be welcoming to parents and supportive to students in developing their unique identities. The plan phases-in changes over a three-year period according to five priority performance challenges.

Plan Component	Evidence of Strengths and Weaknesses in the Plan (key notes emboldened)
Leadership A committed, experienced school leader is a critical component of a successful school turnaround. School leadership must be effectively trained, coached, and evaluated throughout the turnaround.	 + The plan identifies the school principal as having recently joined the campus (2015) + The plan illustrates how the principal will serve as a key instructional leader within the building, responsible for teacher evaluations and informal observation and feedback sessions + The principal is currently participating in Relay and the AP will next year - The plan does not provide a unique job description for the school leader that addresses specific competencies in school turnaround and/or project-based learning - The plan does not address professional development, coaching, support or evaluation for the principal—the innovation zone application only superficially addresses the support structures that will be put in place for school leaders in the innovation zone
	 It is not clear whether the school leader will be supervised and/or coached by an individual who has experience with project-based learning models
Talent The difficulties of school turnaround require a high caliber staff. This entails clearly	 One of the core levers of change identified in the plan is the observation and feedback cycles to develop teachers throughout the year; the plan illustrates how first-year teachers will receive weekly coaching/feedback and teachers with two or more years at the school will receive bi-weekly coaching/feedback Teachers will have two 50 minutes' periods for individual planning, peer collaboration and data analysis



defined recruitment
hiring, and
professional
development
processes.

- The plan outlines a phased approach to professional development that builds teacher skills over time; topics span English Language Development, standards-based instruction, and content-specific deep-dives in literacy and math among others
- The school plans to develop a teacher evaluation system over the coming years, but no details are provided about the guiding principles, resources or personnel that will support this work
- The plan calls for increasing degrees of teacher collaboration, data team analysis, and teacher professional development, but only two of ten teacher planning periods are dedicated to this work each week

Culture

School culture plays a critical role in the success of school turnaround. School staff, students, and families must be invested in a school culture that drives achievement.

- + The plan outlines a number of strategies for the school to build a strong learning-centered culture including the introduction of student advisories and service learning projects that are student-led
- Driven by survey feedback from parents, the school will build a parent center over time that links parents to external resources, provides parents opportunities to volunteer in the school and support parents in their own learning
- + The plans for data-driven instruction, consistent teacher feedback cycles and standards-based instruction will increase the levels of accountability among staff and help build a school culture that drives achievement
- **+** The plan outlines clear expectations for community partnerships that are value-added and aligned to the priority challenges in the school

(no areas of concern noted)

Curriculum, Assessment, Pedagogy

Effective school turnaround plans include researchbased curriculum, assessment, and pedagogical practices.

- The school will follow Marzano's 9 Effective Instructional Strategies (a research-based pedagogy) to establish a shared definition of quality instruction that is supported through professional development and teacher coaching
- **+** The school will introduce thematic units and project-based learning that supports students in synthesizing and applying skills and content knowledge
- **+** Teachers will create common formative assessments in a phased approach that has already commenced as part of their planning year implementation of the TIG plan
- + The school day schedule will extend an additional 50 minutes to 455 minutes to provide learning time in core content areas, particularly at the middle school level, which is aligned to current student performance gaps



	 The plan does not reference specific curricular resources that will support teachers in building units of study under the new project-based learning model and/or support the integration of English language development work into the mainstream instruction The plan does not mention the use of externally benchmarked assessments to help measure student progress
Strategic Use of Resources The budgetary and structural supports provided by the district must leave sufficient room for schools to adhere to their plans.	+ The plan includes a high-level multi-year budget



Crawford Elementary Scorecard

School Name: Crawford Elementary Grades: K-5 Students: 668

Mission: In partnership with our families and community, we engage students in a relevant, rigorous and equitable standards based education in order to accelerate student growth, and create a culture of 21st century learners who are problem solvers, innovators and creative thinkers.

Plan Overview: The Crawford Elementary plan is organized around the major improvement strategies identified in their UIP planning process, including: 1) writing across the content areas, 2) standards-based teaching and learning cycle in math, 3) five components of reading, and 4) school redesign. The innovation plan addresses elements of the school redesign strategy that include lengthening the school day, establishing seven dedicated teacher planning/analysis days in the school year, adopting new curricular resources, adjusting professional development schedules and introducing new community engagement strategies to build relationships between the school, students and families.

Plan Component	Evidence of Strengths and Weaknesses in the Plan (key notes emboldened)
Leadership A committed, experienced school leader is a critical component of a successful school turnaround. School leadership must be effectively trained, coached, and evaluated throughout the turnaround.	 The plan identifies the school principal as having led the past couple years of school improvement efforts, which have produced some academic gains The plan illustrates how the principal will serve as a key instructional leader within the building, responsible for coaching and supporting teachers
	or evaluation for the principal
Talent The difficulties of school turnaround require a high caliber staff. This entails clearly	 The school will implement the 6-Step Process for Observation and Feedback to provide coaching and support to teachers; teacher leaders will be trained in this protocol to extend the reach of this practice through the school The plan includes a detailed map of the specific dates where teacher planning time (intra-day) will be allocated to one of the following: 1) English language development, 2) Math applications, 3) Guided or close



pedagogical practices.	 The plan identifies the need for new interim assessment systems, but does not identify the criteria to select a system nor name a specific assessment tool besides Acuity, which is already in use
Curriculum, Assessment, Pedagogy Effective school turnaround plans include research- based curriculum, assessment, and	 The school will adopt Engage NY for the math curriculum and also utilize Forefront Math as their data tracking system; in year two, the school will adopt an as yet unidentified new core resource for literacy and an assessment system; in year three, the school will adopt an as yet unidentified curricular resource for science and social studies The school day schedule will extend an additional 45 minutes to 405 total minutes, adding opportunities for enrichment, intervention and global leadership skills development
families must be invested in a school culture that drives achievement.	- The school does not identify any changes or improvements to their systems or structures to support positive student culture, though it does outline the existing set of school values and some of the actions that reinforce the values
Culture School culture plays a critical role in the success of school turnaround. School staff, students, and	 The school will partner with Write Our World to capture families' stories about their educational experiences and create intergenerational connections between students and families around expectations for education In a program titled Parents in Action, the school will introduce parent leadership opportunities through a series of community meetings that will be led by parents, but the focus of these meetings is not clear
	 + The teacher duty day will remain the same, even with the extended learning time for students - The plan does not address the teacher evaluation system, which may or may not change to align to the stated expectations for teacher skills and capacity - The plan does not address any unique hiring strategies, though talent sourcing was also not identified as a root cause for current academic performance challenges
defined recruitment, hiring, and professional development processes.	reading and further aligns planning and PD topics for the full-day release days to this same schedule + Teachers will gain 7 days a year to meet for data teams, PD and individual planning; at least two hours in each release day will be teacher directed for their specific planning needs



Strategic Use of Resources	+ The plan includes a high-level multi-year budget
The budgetary and structural supports provided by the district must leave sufficient room for schools to adhere to their plans.	-



School Name: Paris Elementary School Grades: PK-5 Students: 462

Mission: Paris is committed to being an equitable community where all students collaborate to reach their potential through the power of innovation and culturally responsive teaching and become international leaders, risk-takers, and critical thinkers who follow their dreams.

Plan Overview: The plan identifies three root causes for the consistent underperformance on the school performance framework: 1) inconsistent implementation of high-quality instructional practices, 2) lack of systems and structures to support student needs, and 3) inconsistent differentiation of staff supports. The Paris Elementary plan addresses elements of the school redesign strategy including the use of restorative justice and mindfulness practices, character education for students, a mentorship program that brings in community partners, a rigorous interview process, the development of PLCs, a shift to cross-content project-based learning, and an extended school day.

Plan Component	Evidence of Strengths and Weaknesses in the Plan (key notes emboldened)
Leadership A committed, experienced school	(no specific strengths noted, see below)
leader is a critical component of a successful school	 The plan does not provide any information about the expectations, credentials, skills or experience for a school leader to lead and execute the plan
turnaround. School leadership must be effectively trained, coached, and evaluated	 The plan does not address professional development, coaching, support or evaluation for the school leader; it is not clear whether the school leader will be supervised by an individual who has experience with competency-based learning models
throughout the turnaround.	 No specific strategies are noted to recruit and hire a leader, nor is a specific leader identified
Talent The difficulties of school turnaround	+ There will be a summer onboarding process for new staff that ensures they understand key parts of the school's culture and instructional practices
require a high caliber staff. This entails clearly defined recruitment,	 Though a waiver is sought from district standard teacher evaluation processes, no tools are included to show how teachers will be evaluated and the plan does not explain how student achievement will factor into teacher evaluations



hiring, and professional development processes.	 The plan calls for increasing degrees of teacher collaboration, data analysis, and teacher professional development, but no sample schedule is included so it is unclear how scheduling will support this priority
Culture School culture plays a critical role in the success of school turnaround. School staff, students, and	 The school will continue the development of a restorative justice program which the plan mentions has already started to positively influence student behavior and school culture The school will also introduce a community mentoring program and increased opportunities for families and communities to be involved in the school - all targeting enhanced community engagement
families must be invested in a school culture that drives achievement.	 High levels of student disruption, disengagement, and chronic absenteeism are noted in the plan, however the plan does not analyze root causes of these issues so it is unclear whether or not restorative justice and mindfulness will be enough to combat these struggles
Curriculum, Assessment, Pedagogy	+ The plan indicates that all instructional staff will be trained in the professional learning community model which would support the use of student data and targeted planning methods
Effective school turnaround plans include research- based curriculum, assessment, and pedagogical practices.	 No curricular resources are identified throughout the plan; the plan does not name any resources to be utilized in the creation of cross-content, project-based units of study The school intends to continue to use Acuity, the district's assessment system but does not indicate how Acuity assessments will align with cross-content project-based learning
Strategic Use of Resources	Paris will utilize zero-based budgeting to ensure that resources can be allocated in a responsive manner
The budgetary and structural supports provided by the district must leave sufficient room for schools to adhere to their plans.	-