



Public Comment Notification

Low proficiency rates are common throughout the country. To overcome this problem, Arizona must lead with strength and urgency. Studies show that tutoring is the best method of instruction. However, Arizona cannot afford to hire 1.2 million tutors for 1.2 million students. We have made 24-hour, 365-day-a-year tutoring available to schools representing about 160,000 students with artificial intelligence. Our research showed that using Khanmigo is the most effective method to address this. It does not replace teachers- it helps them.

Typically, a teacher administers an assessment, and while some students achieve scores of 90% or higher, others may score 70%. Despite the learning gap, both groups often advance to the next grade. However, those who move forward with only 70% mastery are missing a critical 30% of foundational knowledge that compounds over time. As academic demands increase, these students often struggle to keep up with others and may disengage or become lost in the system. With Khanmigo, the teacher can tell the student, based on the test result, what the student did not learn what the teacher taught, and guide the student to get tutoring on those topics from Khanmigo. Now, 100% of the students can go to the next grade with 90% of what they need to know.

The one and a half percent can be used for other allowable activities¹. Those can be chosen by schools that already have Khanmigo and others that prefer not to use Khanmigo. These include leadership training, literacy coaching, and ACT preparation.

Section 1003A of the Every Student Succeeds Act (ESSA) allows state education agencies (ADE) to reserve up to three percent of the state's Title I allocation to provide funds to Local Education Agencies (LEAs) for direct student services. ADE plans to

¹ Office of Elementary and Secondary Education Open Letter to State Chiefs- Title 1 Part A Guidance March 31, 2025

reserve approximately 1.5 percent of fiscal year (FY) 2026 Title I Part A LEA funds to allow parents to make a meaningful choice in their child's education through direct student services. Funds will be awarded through a competitive grant process focusing on high-quality tutoring through Khanmigo to provide a personalized learning approach, but also may be used for leadership training, literacy coaching, and ACT preparation. Scoring will emphasize activities that will provide parents with the most choices and maximize the impact of these funds and LEAs with the highest percentages of schools identified for comprehensive support and improvement (CSI) or targeted support and improvement (TSI).

LEAs must describe how their organization will provide adequate outreach, time, and information to parents to ensure they can exercise a meaningful choice of direct student services for their child's education, including how the LEA will select providers for direct student services (e.g., LEA staff, a state list of tutoring services, etc.). More information on the specific criteria of the grant application will be available by the middle of May 2025.

This notice will be posted for sixty days, and public comments will occur for thirty days. ADE will review and consider all public comments, and stakeholders may use this process as an opportunity to consult with ADE regarding fiscal year 2026 Title I Part A direct student services and federal grants. ADE wants to obtain feedback from all stakeholders, including LEAs representing suburban, rural, and urban locales, LEAs serving a high percentage of schools identified for CSI, or LEAs serving a high percentage of schools implementing TSI.

Title I Part A stakeholders may submit comments in writing beginning May 1, 2025, using the following methods:

- A) Submit electronically via the ADE/ESEA Public Comment [webpage](#)
- B) Submit electronically to Academic Achievement via [email](#)
- C) Submit handwritten comments directly to Academic Achievement via the USPS to Arizona Department of Education, 1535 West Jefferson St. Bin #32, Phoenix, AZ 85007