



# Submitting Requests to Reconsider for District Accreditation Ratings or School Plan Types

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## Table of Contents

Overview	3
Summary for Submitting a Request to Reconsider	4
Conditions for a Request	4
Submission of Request to Reconsider Materials	7
Reviewing a Request to Reconsider	9
Appendix A: Grade Configurations and State Data Availability	13
Appendix B: Prior Request to Reconsider Decisions	14
Appendix C: Excel Submission File for Supplementary Data	15
Appendix D: Body of Evidence Participation Rates	16
Appendix E: Data Reporting Guidance for Small Systems	17

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The purpose of this document is to provide guidance to districts on (1) how a district may request that CDE reconsider the district's accreditation category as determined by the District Performance Framework, and (2) how a district may request that CDE reconsider the assignment of school plan types as determined by the School Performance Framework.

## Overview

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The Education Accountability Act of 2009 (SB 09-163) and HB18-1355 authorizes the Colorado Department of Education to conduct an annual review of the performance of public schools and districts in the state and to make recommendations to the State Board of Education concerning the type of school improvement plan to be implemented in each school and the accreditation category for each district. The process for determining each district's initial accreditation category and each school's initial plan type and the process for submitting district and school plans are outlined in the [Colorado District Accountability Handbook, HB18-1355](#) codifies current practice under state board rule regarding a district's ability to request a reconsideration of the district's or school's initially assigned rating. Note that this guidance has been updated to reflect the 1 CCR 301-1 proposed rules. [Click here](#) to view the proposed rules.

No later than October 16, 2019, districts must submit to the Department the accreditation category that the district has assigned to each school and the performance framework used by the district for that accreditation assignment, including evidence of the school's level of attainment on the state's three key performance indicators: Academic Achievement, Academic Growth, and Postsecondary and Workforce Readiness. Districts may use the state's SPF ratings to accredit their schools, or they may use their own local accreditation process, provided that their accreditation process is at least as rigorous as the state's.

In addition, no later than October 16, 2019, if a district's analysis of performance for the district or a school is different than the Department's initial assignment of an accreditation category for the district or the Department's initial assignment of a school plan type for any of the district's schools, the district may submit additional information for CDE's consideration through the request to reconsider process. Districts planning to submit a request for reconsideration must submit the [District and School Accreditation and Request to Reconsider Form](#) stating Department the accreditation category that the district has assigned to each school no later than September 18, 2019. Districts may submit an optional draft of their request to reconsider to CDE to receive written feedback by September 18, 2019. If a district would like individualized assistance reviewing any local data, please register for Office Hours (held via phone) [here](#). Office Hours will begin Tuesday, August 27 and will be held from 2 - 4 p.m. every Tuesday and Thursday until the request to reconsider process concludes. CDE staff will hold a request to reconsider informational webinar Tuesday, Aug. 27 at 1pm. Please [click here](#) to attend the webinar.

This document details the process, content and review criteria for requests for reconsideration. The department encourages districts to submit a request when a district has additional information that warrants a change to the Department's initial district accreditation category or initial assignment of a school plan type.

## Summary for Submitting a Request to Reconsider

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If, in reviewing the performance of the district overall or of an individual school, a district determines that a different accreditation rating or plan type assignment better describes the performance of students in the district or school, then the district should engage in the request to reconsider process. The Department will only consider requests that meet one or more of the conditions for a request to reconsider, as outlined below, in assigning a different district accreditation category or school plan type from the initial rating given through the District or School Performance Framework (DPF/SPF) report. Districts must follow the process outlined below on how to submit a request to reconsider, which includes:

1. The [District and School Accreditation and Request to Reconsider Form](#) signed by the superintendent and board chair;
2. A narrative request in letter format addressed to the commissioner with signatures of the superintendent and board chair; and
3. Submission of local data through the [Request to Reconsider excel template](#) (only if submitting local assessment data).

**Request to reconsider submissions that do not include all applicable criteria by the deadline of October 16, 2019 will not be accepted.**

## Conditions for a Request

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The Department will consider requests that meet one or more of the following conditions:

### 1. **Body of evidence of student performance:**

Valid and reliable data demonstrating the progress the district/school has made in its performance on the State's key performance indicators (achievement, growth, and postsecondary workforce readiness) overall and for individual disaggregated groups, and in meeting the minimum expectations set by the state, district, or the school. Guidance for presenting body of evidence data for small systems can be found in Appendix E. CDE will review supplemental information concerning:

- a. *Academic Achievement*: Student achievement and trend analysis on state assessments and/or interim assessments reviewed by CDE, with a performance standard set on these assessments by CDE in consultation with the vendor. All local assessment data must be representative of the school population (i.e. 95% or more students were tested). CDE will request and consider disaggregated achievement results and participation rates when looking at supplemental achievement data.
- b. *Academic Growth*: Student growth and trend analysis on state assessments and/or interim assessments reviewed by CDE, with a performance standard set on these assessments by CDE in consultation with the vendor. All local assessment data must be representative of the school population (i.e. 95% or more students were tested). CDE will request and consider disaggregated growth and participation results.
- c. *Postsecondary and Workforce Readiness (high school and districts only)*: Trend analysis indicating improved performance over time on additional post-secondary measures will be considered. This includes, AP/IB exams and/or remediation rates if 95% of the applicable student population was tested. CDE will also consider additional data around matriculation that may have not been captured with this measure or included in HB15-1170. For example military enlistment, proof of out-of-country CTE, 2-yr, or 4-yr enrollment, gap year with acceptance letter to higher education institution, and/or verification of death.
- d. *Extenuating Circumstances*: The extent to which the District or Institute has been subject to an event that has caused significant disruption during the school year, including but not limited to acts

of violence, the death of students or staff, or natural disasters such as fire, flood, earthquake, avalanche or tornado.

Data from additional assessments or measures should be submitted through the Request to Reconsider Data Templates, which are available on the [Request to Reconsider Website](#).

## 2. Accountability Participation Impact:

A request to reconsider the impact of not meeting the 95% accountability participation rate in two or more content areas, resulting in a rating lowered one level may be made around the following conditions. Requests will not be considered around the actual participation rate and the “low participation” or “met participation” descriptors on the ratings.

- a. If a district or school has attained 95% accountability participation rates, historically, CDE may make an exception for the most recent year. A district or school can request to use the multi-year accountability participation rate on the district or school performance framework for a request to reconsider if the one year framework is official, and the one year accountability participation rate was not met. In this case, the district may request that the district/school rating is not lowered one level due to not meeting the accountability participation rate. The multi-year participation rate can be found on the multi-year performance framework.
- b. If a district or school has met 95% accountability participation rates in the most recent year, CDE may make an exception for the multi-year rate. A district or school can request to use the one-year accountability participation rate on the district or school performance framework for a request to reconsider if the multi-year framework is official, and the multi-year accountability participation rate was not met. In this case, the district may request that the district/school rating is not lowered one level due to not meeting the accountability participation rate as long as the same number of content areas are measured for participation in both the one-year and multi-year performance framework reports. If a content area in the one-year report cannot be measured due to N count, the accountability participation rate of the content area must be 95% or greater.
- c. CDE will consider issues of **N count** (i.e., exception for smaller districts/schools) in reviewing Requests to Reconsider based on participation rates.
- d. If the 95% accountability participation rate requirement has not been met due to reasons other than parent refusals, such as **test misadministrations**, the district and school has a clear and justified reason why students did not count as participants, and a plan to ensure participation improves in the future, CDE may consider a request to reconsider. There may be special considerations given to schools or districts with a test misadministration. In rare instances, a test misadministration may deem some tests invalid, and thus, lower the overall accountability participation rating for a school or district to less than 95%. Depending on the size of the district or school, particularly smaller sized districts or schools, the few non-participants may have a larger impact on the district or school than it would a larger district. If the district and/or school has historically met the 95% accountability participation rate on state assessments and the district or school acknowledges the errors in these misadministrations and has made changes to ensure these errors do not happen in the future, a request may be considered.

## 3. Calculation error

Mathematical calculation error based on the data presented. This generally excludes data submission and verification concerns through the completion of the Student Biographical Data (SBD) collection or

failure to participate in SBD which resulted in uncorrected errors on the district/school performance framework(s).

**4. Impact of Alternative Education Campuses on the District Performance Framework rating.**

As per SB 13-217 and 1 CCR 301-1, CDE may re-evaluate the accreditation category assigned to districts through the District Performance Framework (DPF) for districts that serve a significant number of students in Alternative Education Campuses (AECs). CDE recognizes the unique circumstances and needs of students enrolled in AECs, and that the performance frameworks could be considered a disincentive for authorizing Alternative Education Campuses. Thus, districts which serve large numbers of AEC students may submit a Request for Reconsideration of its DPF rating if it meets the following criteria:

- 4.01 (D)(1) removing the data for students enrolled in the Alternative Education Campus(es) from the calculations of the District’s or Institute’s performance on the Performance Indicators would otherwise cause the District or Institute to receive a higher Accreditation rating; and
- 4.01(D)(2) (a) the Alternative Education Campus(es) has/have been assigned by the State Board to implement a School Performance Plan; or (b) the Alternative Education Campus(es) no longer serves students.

CDE staff will calculate the impact data on a district’s DPF and will notify potentially eligible districts. AEC SPF ratings will not be available until after the release of the preliminary performance frameworks, so once those are completed, CDE will identify which districts are eligible for this request.

**5. Districts with a single school.**

Under 1 CCR 301-1 4.02, which states “[t]o accommodate the special circumstances of those Districts that include only a single Public School, the Commissioner may elect to apply the Public School performance evaluation framework described in section 9.00 of these rules for evaluating such a District,” districts may elect to use the school performance rating as the district accreditation rating, when there is only one public school in a district.

**6. Small districts and schools.**

For smaller schools and districts, data submitted through the body of evidence may be weighed more heavily, as state data may not be fully representative or may not be able to be reviewed due to small N size.

**7. Districts with a closed school.**

Districts with Priority Improvement or Turnaround Plan types that have closed a district school at the department or state board’s request, or due to a district decision based on low performance, may request a reconsideration for re-calculating the District Performance Framework with the closed school removed. Additionally, if the district decided to close or transfer a school, then this impact may be considered as part of a request.

**8. ELA CMAS grade 8 to PSAT 9 growth.**

CMAS English Language Arts assessment results will no longer be linked to PSAT/SAT results in determining student growth percentiles. CMAS English language arts (ELA) and PSAT measure the Colorado Academic Standards (CAS) in different ways. CMAS requires students to engage in direct writing, while PSAT does not. The resulting correlation between these two tests is below 0.80, a target that is appropriate for this high stakes use and which is met by the other assessments included in the frameworks. Given the two assessment approaches to measuring the CAS, to improve the interpretation

of growth scores, ELA CMAS grade 8 to PSAT 9 growth scores will not be included in the 2019 performance frameworks.

By the end of August 2019, CDE will calculate ELA CMAS grade 8 to PSAT 9 growth for all districts and schools. CDE will contact those districts where the district or school performance framework was lowered an accreditation rating or school plan type due to exclusion of these growth data and will provide instructions for those districts to complete an expedited request to reconsider. Note this condition will only be available for the 2019 Frameworks.

#### 9. **Insufficient State Data Rating.**

Due to some districts and schools experiencing low levels of participation on state assessments, CDE has added an option on the accreditation form which allows districts and schools to request “insufficient state data” as an overall accreditation rating or school plan type. This option is available only to schools or districts with state assessment participation rates at or below 85%. In order to select this as a district’s final accreditation rating or school’s final plan type, the following information needs to be submitted through the request to reconsider process:

- a letter addressed to the commissioner of the department of education signed by the superintendent asserting that due to high-levels of parent excuses/ non-tested students on the state assessment the data reported on the district and/or school performance framework(s) is not representative of the student population in the district/school and the reasons why.
- Data must be provided to show how the participating students are not representative of the total school/district population (a template is available [here](#) for your use).

## Submission of Request to Reconsider Materials

If a district disagrees with the Department’s initial assignment of a district accreditation category or school plan type assignment for any of its schools, a district may submit additional information for the Department’s consideration. The district must submit the [District and School Accreditation and Request to Reconsider Form](#) no later than September 18, 2019 indicating this intent to submit a request to reconsider with final submissions for a request for reconsideration due no later than October 16, 2019. Districts that wish to submit a request for reconsideration may submit a draft submission to the Department by September 18, 2019. The District and School Accreditation and Request to Reconsider Form allows districts to indicate if they agree or disagree with the State’s plan type and, where they disagree, to provide their requested plan type and rationale. Districts must select only one district accreditation rating or school plan type rating in final request to reconsider submissions (for example, a request for either an Improvement Plan or Insufficient State Data will not be accepted).

The following components are required for complete submission of a request to reconsider:

1. A determination from the district regarding why they disagree with CDE’s recommended school plan types and the district’s recommended plan type assignment for the school(s) in the [District and School Accreditation and Request to Reconsider Form](#). This form must be submitted electronically by September 18, 2019 and signed by the superintendent and local board chair and submitted along with the remaining request to reconsider submission documents by October 16, 2019.
2. A statement addressed to the Commissioner that presents the district’s rationale for why the district disagrees with the state’s District or School Performance Framework, and why the district would propose a different accreditation rating or school plan type. This statement should:
  - a. include the condition of the request per the above section; and
  - b. be signed by the district’s superintendent and local board of education chair; or
  - c. be signed by, for charter schools authorized by the Charter School Institute (CSI), the CSI executive director and the CSI board chair; and

- d. include an assurance from the district's superintendent that, for charter schools not authorized by CSI, the charter school's board chair has been consulted.
3. Submission of local data through the [Request to Reconsider excel template](#) (only required if submitting local assessment data).

**Request to reconsider submissions that do not include all applicable criteria by the deadline of October 16, 2019 will not be accepted.** All criteria must be submitted via [Syncplicity](#) in the request to reconsider subfolder of the "Prelim\_2019\_Frameworks" folder, by October 16, 2019. All documentation received by that date will be considered final. CDE will not follow-up on any data or documentation submitted after October 16, 2019.

### Receiving Feedback from CDE: Draft Process and Office Hours

Requests submitted by October 16, 2019 are considered final, if a district would like feedback from CDE, the district is encouraged to participate in the draft request to reconsider process by September 18, 2019. In 2018, 32 districts participated in the draft process and we received 10 district draft submissions (DPF) and 58 school draft submissions (SPF). All draft submissions will receive written feedback from CDE via Syncplicity on their request no later than two weeks prior to the request to reconsider deadline of October 16, 2019. If a district chooses to rescind their draft request after receiving feedback from CDE they may do so in writing via [accountability@cde.state.co.us](mailto:accountability@cde.state.co.us) by October 16, 2019 and the request will no longer be part of public record. If a district does not wish to make any changes on their draft submission after receiving feedback from CDE, the draft submission will become the final submission and no additional submission is necessary. All changes made to a draft request to reconsider submission must be submitted in final form via Syncplicity by October 16, 2019. No additional changes or requests will be accepted after that date.

If a district would like individualized assistance reviewing any local data, please register for Office Hours (held via phone) [here](#). Office Hours will begin Tuesday, Aug. 27, and will be held from 2 - 4 p.m. every Tuesday and Thursday until the request to reconsider process concludes. CDE staff will hold a request to reconsider informational webinar on Tuesday, Aug. 27 at 1 pm. The link for the webinar is available on the [request to reconsider website](#) or accessible [here](#)

### Using a District-Created School Performance Framework

If a district is using a School Performance Framework different from the state's as a basis for the request to reconsideration, a summary of the specific performance framework used to determine the school's plan assignment, and the actual framework results for the school, as indicated on the School Accreditation Form, will need to be submitted. If the district-created school performance framework is deemed to be more rigorous than the state school performance framework, CDE will defer to the district-created framework rating only if the rating shows a lower rating than the state school performance framework. If the district-created school performance framework shows a higher rating than the state school performance framework, the district must submit additional evidence to support the higher rating aligned with the requirements of the "body of evidence" condition for a request, as stated above.

### The Request to Reconsider Excel Template for Local Assessment Data Submissions

CDE has created templates in Microsoft Excel for a more systematic way to present supplemental data for review in their Request to Reconsider submission. The intention for these templates is to ease the level of effort required when submitting additional data to CDE, as well as to assist with data integrity and consistency among common interim or formative assessments. CDE hopes that these data templates will help districts when presenting their rationale of supplementary performance data and ensure consistent reviews. Please see Appendix C: Excel Submission File for Supplementary Data for the excel templates to submit supplementary evidence for your school or district's performance on common interim and/or formative assessment(s), if

applicable. Note there are several assessments listed in the template; CDE does not expect data on all of these assessments but only the assessment(s) given in your school/district which are presented in your evidence for the Request to Reconsider. CDE will not accept data from these specific assessments presented in any other manner than in these Excel spreadsheets. If a template does not exist for a specific data source, there is an additional tab available for you to input your data. However, any other assessments must be aligned with the Colorado Academic Standards. In order to show alignment, you will need to complete the [Assessment Review Tool](#), as part of your request to reconsider. Districts are encouraged to contact CDE as soon as possible if using an assessment not included in the request to reconsider template. If you have questions or concerns, please contact the Department at [accountability@cde.state.co.us](mailto:accountability@cde.state.co.us).

CDE recommends sending multiple years of data to show positive trends or data on multiple grades. The templates have been revised to include tables for multiple years of data. Please note that due to FERPA rules, CDE staff cannot publish or review student data of less than 16 students.

### **Note on Alternative Education Campuses**

The Selection of Measures process for Alternative Education Campuses (AECs), which includes participation in the AEC Actual Measures and Data Pipeline Collection, is currently the process whereby CDE accepts and incorporates local measure data into the Alternative Education Campus School Performance Frameworks (AEC SPFs) for both schools with an AEC designation already in place and schools which are receiving an AEC designation for the first time. Please note that the inclusion of local data or measures is not an option for districts to submit for the AEC SPF for the body of evidence condition through the Request to Reconsider process; therefore, submission of these local measures through the Selection of Measures process (the Actual Measures and Data Pipeline Collection) must occur before the frameworks are generated.

## **Reviewing a Request to Reconsider**

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Upon receipt of a Request to Reconsider statement and accompanying documentation, the Department will review the request and formulate a recommendation as to the district's final accreditation category or the school's plan type assignment. The review will be conducted by a cross-unit CDE team. Program staff (including the accountability and data analysis unit, unified improvement planning unit, schools of choice unit, office of blended and online learning, dropout prevention and engagement, early learning and school readiness, field services, and/or exceptional student services) will also be consulted as appropriate. CDE staff will evaluate the extent to which the request meets the conditions and data criteria outlined in this document and whether the additional evidence supports a different rating. The staff will then make a recommendation to the Commissioner as to the district's final accreditation category and/or school plan type. The Commissioner assigns district accreditation ratings and recommends school plan types to the State Board of Education for approval at the December State Board of Education Meeting.

### **CDE Decision-Making Considerations**

Requests for reconsideration will only be considered if the request is to change the district accreditation rating or school plan type. Requests will not be considered if the request is to change individual performance indicator ratings or data points within the frameworks. Additionally, requests will not be considered if the request is to change the year on the accountability clock or performance watch status (for example, it is not applicable to submit a request to remove the "on watch" identifier). The Department will only consider requests that meet one or more of the conditions for a request to reconsider as outlined in this policy guidance document. All requests received by October 16, 2019 are public documents and part of public record.

For requests for reconsideration concerning accountability **participation rate impact, calculation errors, the impact of Alternative Education Campuses, ELA CMAS grade 8 to PSAT 9 growth, districts with a single school, and districts with a closed school**, re-calculations will be made by CDE to determine the impact on the overall accreditation rating/school plan type assignment, if the necessary conditions are met and data submitted. Those conditions are described in the “Conditions for Request” section and associated appendices.

For reviewing requests for reconsideration based on a **body of evidence**, the following considerations will be used to determine how heavily the supplemental data is considered:

- **The percent of state-tested grades**

For schools with a small percentage of their students included in the performance data in the School Performance Frameworks (K-3 schools, for example), data submitted through the body of evidence will be weighed more heavily, as limited grades are tested with state assessments. See Appendix A: Grade Configurations and State Data Availability for a table describing the percent of state assessed grade level data for different grade configurations.

- **Small schools and districts**

As documented in “[Revisiting N Size: Evaluating Outcomes on the School and District Performance Frameworks Relative to N Size](#)” by Dr. Elena Diaz-Bilello, challenges exist with plan type assignments for small school and district systems. Schools and districts with smaller numbers of students tend to see more variability in performance than larger systems. While the three year framework (when available) helps to mitigate the variability, it also may mask improvements in systems. For smaller schools and districts, data submitted through the body of evidence may be weighed more heavily, as state data may not be fully representative.

CDE is committed to working with small schools and districts to analyze data in order to ensure robust plan type assignments for schools and accreditation ratings for districts. Please see Appendix D for more information regarding body of evidence and participation on local assessments for small schools and districts. Please see Appendix E for tips on analyzing trends and patterns in student data when student N count is small.

- **Distance to State Targets**

When reviewing a request to reconsider CDE will review the additional supplemental data presented for the performance indicator(s) in which it applies. If the additional supplemental data is positive, it will be factored into the weighting for that indicator through the decision making process. (The actual data reported on the final performance frameworks will not change). If the rating for a particular indicator or sub-indicator is close to the cut-point, the district or school is more likely to advance a rating than a district or school that is further from the cut-point.

- **Local assessment alignment with Colorado Academic Standards**

CDE has reviewed several assessments for alignment with the Colorado Academic Standards and those can be found in the request to reconsider template. Note that not all of these assessments listed in the template have been approved by the Colorado Content Collaboratives or are READ Act Approved Assessments. The members of the Colorado Content Collaboratives consist of Colorado educators who are content experts and possess significant skills and knowledge related to the review and development of assessments in their content area. The Content Collaboratives utilized the Colorado Assessment Review Tool to collaboratively review assessments for: (1) alignment to the content and rigor of the Colorado Academic Standards, (2) high quality scoring criteria, (3) the extent to which the assessment is fair and unbiased, and, (4) the opportunities for students and teachers to learn from the assessment

results. All reviews are done from the perspective of the purpose of the assessments and the intended use of the assessment results. CDE will take the Colorado Collaboratives recommendations into consideration when reviewing data for Request to Reconsider submissions. Additionally, READ Act assessments are incorporated in the request to reconsider template as well. [Click here](#) for more information regarding the READ Act Assessments. CDE has chosen to include external assessments in the request to reconsider template based on previous years' Request for Reconsideration submissions. CDE coordinated with these vendors to determine criteria for review and vetted these assessments for accountability purposes only and in no way does CDE endorse any of these external assessments over another or intentionally exclude an external assessment. Additionally, the cut-scores and review of the external assessments does not guarantee alignment with results on the CMAS assessments.

### CDE Recommendations for a Successful Submission

A successful case for a request to reconsider based on a **body of evidence**, at a minimum, will include 1 year of data for requests based on a 1-year school performance framework and 3 years of data for requests based on a multi-year framework or districts and schools on the accountability clock (i.e. priority improvement or turnaround) or on performance watch encompassing:

1. Representative student achievement and growth on select interim assessments reviewed by CDE, with a performance standard set on these assessments by CDE in consultation with the vendor. Representative data means that at least 95% of students participated in the assessment and are included in the results submitted. To view those approved interim assessments, please see the Request to Reconsider Template in [Appendix C: Excel Submission File for Supplementary Data](#).
2. For multi-year requests or districts or schools on the accountability clock (i.e. priority improvement or turnaround) or on performance watch: Trend analysis (increases observed each year) conducted over a 3-year period indicating improved achievement and growth on state assessments.
3. For multi-year requests or districts or schools on the accountability clock (i.e. priority improvement or turnaround) or on performance watch: Trend analysis (increases observed each year) conducted over a 3-year period indicating improved performance over time on local interim assessments. To view those interim assessments, please see the Request to Reconsider Template in Appendix C: Excel Submission File for Supplementary Data.
4. For multi-year requests or districts or schools on the accountability clock (i.e. priority improvement or turnaround) or on performance watch: Trend analysis (improvements observed each year) conducted over a 3-year period of indicating improved performance on selected post-secondary metrics (only for high schools and districts).

For small systems, it is recommended to aggregate or combine data among grades, school levels or years to create larger N-sizes that provide meaningful patterns and can be publicly reported. Data may be reported across more than one school year, grade level, clustered levels (e.g., primary, intermediate), school levels (elementary, middle, high), and/or by cohorts depending on the size of the group. Note that CDE can only review data when the N sizes are above 16 students for academic achievement and post-secondary metrics and above 20 students for academic growth metrics. For more recommendations on how to present data for small systems, visit Appendix E of this guidance document.

### Final District Accreditation Category and School Plan Type

Prior to the December State Board of Education Meeting, the department will notify districts of the recommended accreditation category and school plan type for districts and schools going through the request to reconsider process. Districts and schools not going through the request to reconsider process will be notified of their final district accreditation rating or school plan type after the conclusion of the November State Board of Education Meeting. If a district wishes to further appeal a district accreditation category of Accredited with Priority Improvement Plan or Accredited with Turnaround Plan, the district will have the opportunity to file an

appeal to the State Board. For more information about the appeals process, please refer to 1 CCR 301-1, section 6.00 "[Rules for the Administration of Accreditation of School Districts.](#)"

If after consideration of the additional evidence through the request to reconsider process, the state changes the district accreditation category or recommends a different school plan type, only the final determination for the accreditation category or plan type will be reported on the district or school performance framework report posted online on SchoolView. Note, however, that the initial data on the performance indicators and percent of points earned will not change on the School Performance Framework or District Performance Framework report posted online.

### **Support from CDE**

CDE staff is available to provide technical assistance with the process of school accreditation and submissions of Requests to Reconsider. [Click here](#) for more information.

For support, please contact Jessica Watson, [watson\\_j@cde.state.co.us](mailto:watson_j@cde.state.co.us) or 303-866-6778.



## Appendix B: Prior Request to Reconsider Decisions

A detailed summary of CDE's decisions on approving and denying requests to reconsider submissions from 2018 and years prior are available on the [Request to Reconsider Website](#).

A summary of the 2018 district and school requests to reconsider are below. CDE received slightly more requests in 2018 than in 2017. In 2018 CDE received 22 district requests, compared to 40 in 2017 and 164 school requests compared to 140 in 2017.

### 2018 District Requests to Reconsider

*Of the 22 district requests, 17 were approved or partially approved (77%). Note there are more request types than total number of requests as some district requests crossed two or more types of request. Please see the summary document on the request to reconsider homepage for details.*

Type of Request	Approval or Partial Approval*	Denial	Total
Body of Evidence	4	3	7
Accountability Participation Rate Impact	4	0	4
AEC Impact	4	2	6
Insufficient State Data	3	0	3
Districts with a Single School	4	0	4
Small District	0	1	1

\*Partial Approval is awarded when a district makes more than one type of request to increase the accreditation rating and one type is approved, and one is denied.

### 2018 School Requests to Reconsider

*Of the 164 school requests, 119 were approved or partially approved (73%). Note there are more request types than total number of requests as some school requests crossed two or more types of request. Please see the summary document on the request to reconsider homepage for details.*

Type of Request	Approval or Partial Approval*	Denial	Total
Body of Evidence	18	31	49
Accountability Participation Rate Impact	25	6	31
Insufficient State Data	11	7	18
District requested to lower rating	60	0	60
Small System Consideration	1	3	4
Retroactive AEC Designation	5	0	5

\*Partial Approval is awarded when a district makes more than one type of request to increase the school plan type and one type is approved, and one is denied.

## Appendix C: Excel Submission File for Supplementary Data

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Please visit the [Request to Reconsider Website](#) to download the Excel template.

Interim and formative assessment data submitted by schools and districts should be reported using the Microsoft Excel templates prepared by CDE. CDE will not accept data presented in any other form. Additional criteria for submitting interim assessment data, which are included in the templates, include:

- Testing administration date and the total number of students enrolled, and the total number of test takers at the time of administration. (Participation rates will be calculated from these numbers and only results where 95% of students tested will be considered).
- Growth data should reflect gains made using the beginning of the year as baseline, compared to the end of the academic year, and then compared to national norms.
- For growth reports, the number of students enrolled between the two administration dates and the number of students taking the interim test during both periods should be noted. **Only results for students who took both administrations of the assessment should be included for growth calculations.**
- Opportunity to show up to three years of data.
- Opportunity to include results for disaggregated groups.

## Appendix D: Body of Evidence Participation Rates

2018-19 CMAS Exams	District or school has 95% participation or higher on the state assessments	District or school has less than 95% participation on the state assessments	
	All, or almost all, students are reflected in the performance data.	The accountability participation rate (the rate when parent excusals are removed) is greater than or equal to 95%.	The accountability participation rate (the rate when parent excusals are removed) is less than 95% in two or more content areas.
<b>Student count is 16 students or higher</b>	<p>A preliminary rating will be calculated.</p> <p>Additional data can supplement state assessment data for non-state tested grades if participation on local assessments is 95% or higher.</p>	<p>A preliminary rating will be calculated based on the data available.</p> <p>Additional data can supplement state assessment data for non-state tested grades if participation on local assessments is 95% or higher.</p> <p>Local data cannot supplant state tested grade levels.</p> <p>Low participation rates will be noted on the framework reports.</p>	<p>A preliminary rating will be calculated. Due to not meeting the accountability participation rate requirement, the district or school will be automatically decreased one accreditation rating/plan type by the state and this will be noted on the framework.</p> <p>Additional data can supplement state assessment data for non-state tested grades if participation on local assessments is 95% or higher. Local data cannot supplant state tested grade levels.</p>
<b>Tested student count is less than 16 students</b>	N/A	<p>Schools/districts without any publicly reportable state data will be assigned an overall rating of “Insufficient State Data: Low Participation.”</p> <p>Due to the lack of state data that can be reviewed or reported publicly, any additional local data would supplant state results, which is not allowable.</p> <p>If the district/school was in priority improvement or turnaround on the accountability clock, it will remain on hold but the year on the clock will not move forward.</p>	<p>Schools/districts without any publicly reportable state data will be assigned an overall rating of “Insufficient State Data: Low Participation.”</p> <p>Due to the lack of state data, any additional local data would supplant state results, which is not allowable.</p> <p>If the district/school was in priority improvement or turnaround on the accountability clock, it will remain on hold but the year on the clock will not move forward.</p>
<b>Small Systems: Total student count is less than 16 students</b>	Initial ratings of “Insufficient State Data: Small Tested Population” will be assigned. Districts will submit the district’s accreditation rating for the school to recommend the plan type. CDE may request additional local data.	<p>Initial ratings of “Insufficient State Data: Small Tested Population” will be assigned.</p> <p>Districts will submit the district’s accreditation rating for the school to recommend the assigned the plan type, with the exception of districts and schools with prior priority improvement or turnaround plan types who can submit additional data through the request to reconsider process.</p>	<p>Initial ratings of “Insufficient State Data: Small Tested Population” will be assigned.</p> <p>Districts will submit the district’s accreditation rating for the school to recommend the assigned plan type, which will then automatically be lowered one accreditation rating by the state due to low participation.</p>

## Appendix E: Data Reporting Guidance for Small Systems

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The guidance below is an excerpt from the [“Unified Improvement Planning: Guidance for Small Systems”](#) document which was created for small school systems to provide guidelines and recommendations for creating and updating Unified Improvement Plans (UIPs). Staff members in small systems often have questions about how to effectively plan with limited access to state required data metrics or, in some cases, how to write a plan when numbers are too small to be reported publicly. Please click the link above to review the entire document.

### **How do we analyze trends and patterns in our data when our student numbers are small?**

It is recommended to aggregate or combine data among grades, school levels or years to create larger N-sizes that provide meaningful patterns and can be publicly reported. In some cases, schools/districts may need to conduct an analysis of the data without reporting numbers. Considerations for both approaches are detailed below.

Considerations/Recommendations:

- Use the DPF/SPF performance indicator areas (i.e., achievement, growth, growth gaps, PWR) to focus the analysis of local data. If there are gaps because of small N-counts, acknowledge that in the UIP and include analysis of local data to supplement.

*For example: How are students achieving on the quarterly administrations of NWEA? How quickly are students moving from intensive to strategic to benchmark on DIBELS?*

- If performance is similar, data may be reported across more than one school year, grade level, clustered levels (e.g., primary, intermediate), school levels (elementary, middle, high), and/or by cohorts depending on the size of the group.

*Consider this example: “For the past three years, the 21 students needing to catch-up in grades 4-5 have had lower student growth percentiles than other students within the school, and below the typical level of 35.”*

- In many ways, individual student level metrics (e.g., student growth percentiles) provide more accurate and actionable data about school and district performance than summary metrics. If aggregation does not adequately provide large enough numbers or meaningful results, the school/district may describe the analysis and findings without sharing the numbers and percentages to avoid identifying students.

*Consider this example: “We analyzed math data for individual students across our K-12 school and noted that in the majority of cases, students who were proficient in math in 3rd grade were no longer proficient by the time they got to 8th grade.”*