



November 7, 2016

Dr. Katy Anthes
Interim Education Commissioner
Colorado Department of Education
201 East Colfax Avenue
Denver, CO 80203

Dear Interim Commissioner Anthes,

The Montezuma-Cortez RE-1 District is respectfully requesting a reconsideration of the District's preliminary performance framework rating as well as the preliminary performance framework ratings for Cortez Middle School (CMS) and Montezuma-Cortez High School (MCHS), based on the participation rates and representativeness of the 2016 state assessment data in our secondary schools and the resulting impact on our overall District preliminary accreditation rating.

Request for Reconsideration for Montezuma-Cortez High School and Cortez Middle School

Our initial District rating is Priority Improvement Year 6. Our initial secondary school ratings include Cortez Middle School with a preliminary rating of Turnaround Year 1 and Montezuma-Cortez High School with a preliminary rating of Priority Improvement Year 1. While we recognize the validity and importance of the data with regards to the students who took the test in these two schools, we have concluded through our analysis that the impact of low participation on the available state testing data has resulted in preliminary accreditation ratings that are not representative of the student body and school performance as a whole. We are particularly concerned with the initial accreditation ratings for Cortez Middle School as it had previously been rated as "Performing" and this preliminary rating represents a significant drop that we believe is not fully representative of the school's overall performance. Therefore, we are requesting a rating of Insufficient State Data: Low Participation for Cortez Middle School and that Montezuma-Cortez High School be rated either based solely on PSR data or be granted an Insufficient State Data: Low Participation rating based on the attached data which is also summarized below.

Participation Rates: Due to regional political sentiment among parents and community members regarding Common Core and particularly PARCC testing, we had limited participation in state assessments in our district and especially in our secondary schools. This is a regional trend and many of our surrounding districts, including the Mancos, Dolores, and Dove Creek districts experienced participation rates that were similar to or significantly worse than ours. Specifically, the participation rates for Montezuma-Cortez were as follows:

	English Language Arts	Math	Science
Elementary	87.9%	87.7%	85.4%
Middle	70.1%	70.6%	57.1% (mirrors steep decline in participation in 8 th grade in ELA and Math)
High (MCHS and SWOS AEC charter school)	23.4% MCHS 26% overall	23.4% MCHS 26% overall	6.9% MCHS 21% overall

Representativeness of the Tested Students: In addition to the participation rates noted above, the District contends that the students that did participate in PARCC testing are not representative of the full school population, as evidenced by the attached analysis which is summarized below:

- **Demographics:** the demographics of the students who tested at both MCHS and CMS are significantly different than the students who were opted out. Specifically, the tested students' demographics are not representative of the school as a whole and in fact the tested students "over-represent" groups that are statistically more likely to experience growth and achievement "gaps" when we look at state data (see Appendix A: Figures I-IV)
- **Typical Student Achievement Profile:** The District STAR achievement data shows differences in the typical achievement profile of PARCC tested students compared to students who did not take the PARCC test. This analysis was based on median STAR scale scores in math and ELA and held true in all subjects and grade levels analyzed at the middle school and high school levels (see Appendix A: Figures V-VII).
- **Whole School Growth:** The District had a strong participation rate in STAR testing in grades K-11 and therefore has MGP growth for CMS and MCHS that we believe are more representative of our student population as a whole. The District met or exceeded the CDE growth benchmark for STAR in 7 out of 8 analyzed grades/subjects (see Appendix A: Figure VIII-X).
- **Growth Cohort Comparison:** The District STAR growth data shows differences in the typical growth profile of PARCC tested students compared to students who did not take the PARCC test. This analysis was based on median growth percentile in STAR in math and ELA and held true in 5 out of 6 subjects/grades analyzed for CMS (see Appendix A: Figures XI-XIII).
- **Projected Achievement Profile:** The District conducted an analysis of STAR achievement scores for non-PARCC tested students in grades 6-8 based on the national STAR-PARCC correlation study completed in 2016. This analysis included "statistically projected PARCC proficiency bands" for our non-tested students based on the national study (Appendix A: Figures XIV-XX). This analysis also showed significant potential differences in the achievement profile of the non-PARCC tested cohort at Cortez Middle School.

Based on the fact that the percentage of students that tested on PARCC in our secondary schools is limited (approximately 23% at MCHS and 57-78% in CMS grades) and that these students do not fully represent our entire student population as demonstrated in the attached, we respectfully request an Insufficient State Data: Low Participation rating for Cortez Middle School and that Montezuma-Cortez High School either be accredited solely on their PSR data or be granted a rating of Insufficient Data: Low Participation.

Request for Reconsideration for District Performance Framework Rating

Finally, the District is requesting that the student level PARCC data and associated performance framework data for the Cortez Middle School and the Montezuma-Cortez High School be removed from the District Performance Framework calculations for all the reasons articulated above and in the attached data analysis. As illustrated in Appendix B, the demographic composition of the tested students in grades 3-9 & 11 is significantly different than the whole student population demographics for grades 3-9 & 11. Furthermore, the non-PARCC tested cohort student demographics are dramatically different from the whole district demographics for those grades. However, based on our analysis there is no scenario in which a District Performance Framework can be constructed based on inclusion of all available data that would be an accurate representation of all tested grades in terms of demographics and performance. However, we do believe a District performance framework can be constructed that is representative of the performance and demographics of our elementary and non-AEC charter students and MCHS PSR data since these were not as adversely impacted by opt-outs. For SWOS, while we have not yet seen the AEC preliminary frameworks due to delays in their release, we are requesting that this data be excluded from the District Framework to avoid a disproportionate impact of AEC data on the District overall framework. Therefore, the District is requesting that the District accreditation rating for 2016-17 be based solely on the academic performance and growth of our elementary and non-AEC charter schools and the MCHS PSR data, which we believe are the most representative data available for our district due to the impact of low participation in at CMS and MCHS.

The District takes our commitment to students and ensuring their academic growth and achievement seriously. Toward that end, we have been engaged in ongoing, significant whole-district turnaround work with the University of Virginia and targeted work with our previously identified Priority Improvement and Turnaround Schools. We were encouraged to see progress this year with our Turnaround Year 5 elementary school, Kemper, moving all the way to a preliminary accreditation rating of Performance and our Turnaround Year 4 elementary school, Manaugh, moving to Priority Improvement. Regardless of the outcome of this request, we remain committed to deep turnaround and school improvement efforts across the district and in our elementary and secondary schools. We also remain committed to a continued partnership with the Colorado Department of Education in these improvement efforts as well as our efforts to engage our parents and students in improving our testing participation rates.

Please do not hesitate to contact us with any further questions about our request for reconsideration or our district and school improvement efforts.

Thank you for your consideration.



Lori Haukeness, Superintendent

Date 11/7/16



Dr. John Schuenemeyer, Board Chair

Date 11/7/16

Appendix A: District Data Analysis for MCHS and CMS

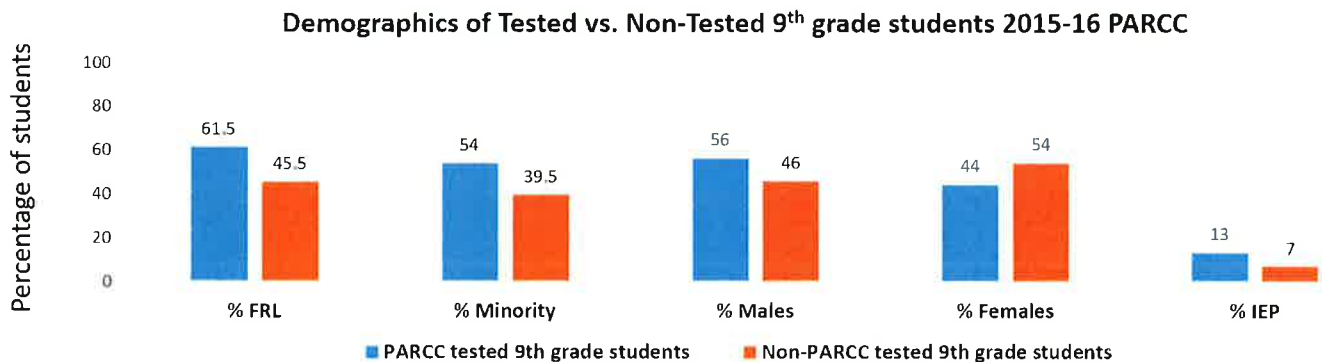
Introduction

The District engaged in this analysis based on feedback from Principals and District instructional leaders that the data we received from our PARCC testing, while accurate for the students tested, did not feel representative of the school as a whole based on our local data. In addition, principals shared that they believed that it was their higher performing students who were opted out. Therefore, the guiding question for this analysis was “are there substantive differences in the characteristics of the cohort of students who tested on PARCC compared to the cohort of students who did not test that we can see in the data we have available”? From the results of this analysis, presented below, the District team has concluded that yes, there are substantive differences in the two cohorts in their characteristics as well as their performance profiles.

Demographics of PARCC Tested vs. Non-PARCC Tested Students

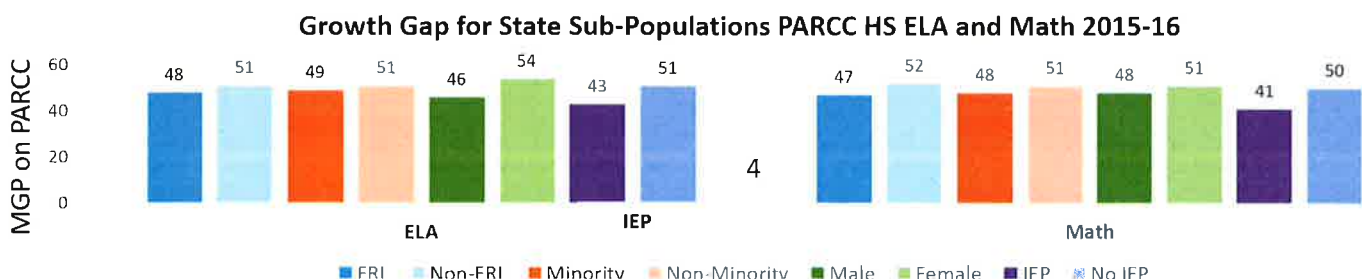
The District analyzed the demographic profile for students who participated in the PARCC testing in 6th-8 and 9th grade compared to the demographic profile of students who did not participate and found significant differences in both CMS 6th-9th and MCHS 9th graders. In both schools the population of students who took the PARCC tests were over-representative of students of color, students who qualify for FRL, students with IEPs and in some cases males compared to the population of students who did not take the PARCC test.

Figure I – MCHS Demographics



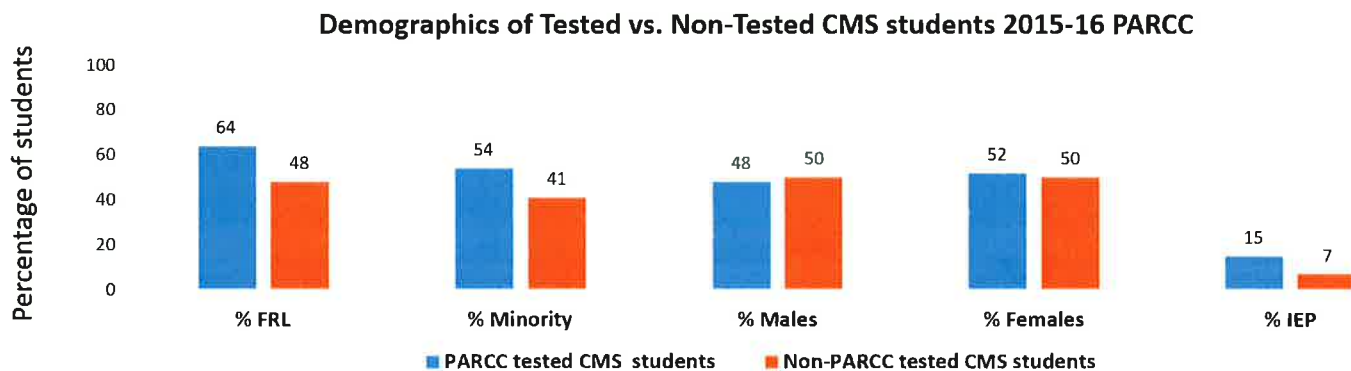
As we know from state data, the student populations who were over-represented in our PARCC tested cohort are students who are statistically more likely to experience growth and achievement gaps.

Figure II – State Growth Gaps for PARCC 9th Grade ELA and Math



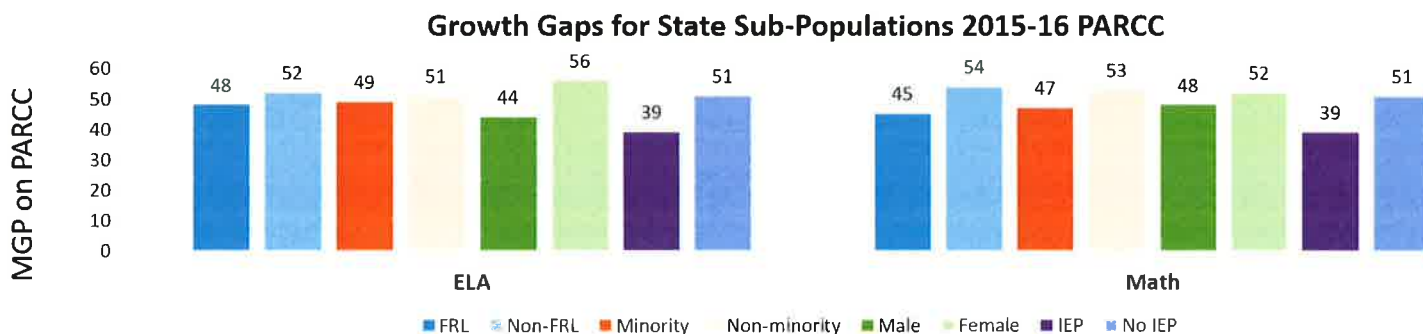
The same patterns held true when we analyzed our Cortez Middle School cohort data demographics for students who took the PARCC test as compared to students who did not participate in the PARCC testing last year.

Figure III – Cortez Middle School Demographics



Similarly, our review of State data found similar growth gaps for student populations that were over-represented in our CMS PARCC tested cohort.

Figure IV – State Middle School Growth Gaps



Typical Student Achievement Comparisons

The second area of analysis deals with whether there is evidence in our local STAR data, for which we had a participation rate of 95%, that would demonstrate any significant differences in the typical academic achievement of students in the PARCC tested cohort as compared to the

non-PARCC tested cohort. To conduct this analysis, we compared median STAR scale scores for each cohort in math and ELA in each grade at CMS and in 9th grade at MCHS. The results, which are displayed below, found that there were indeed differences in median STAR scale scores for the two cohorts which indicated that median scale scores for non-PARCC tested students were higher than PARCC tested students in every subject and grade level analyzed.

Figure V – MCHS 9th Grade Median Scale Score Comparison

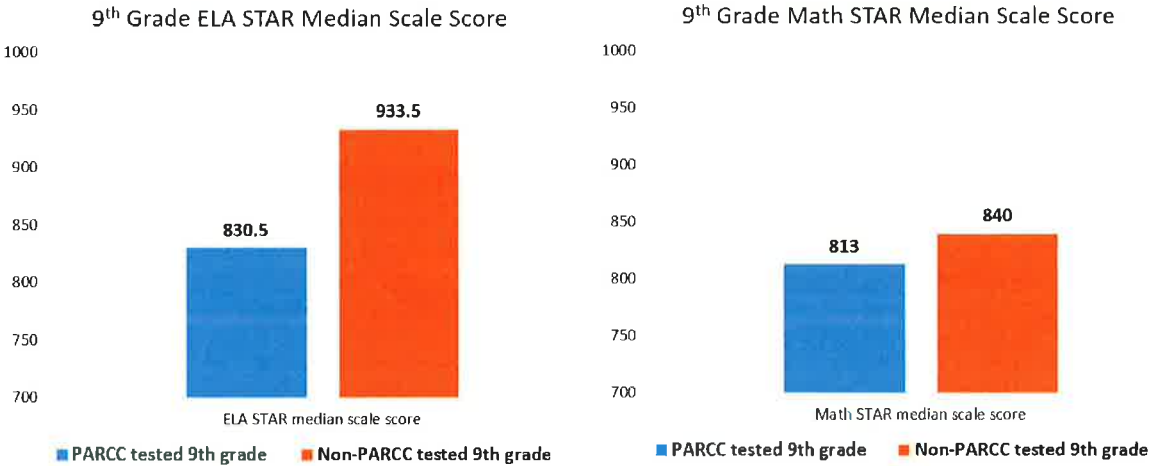


Figure VI – CMS 6th-8th Grade ELA Median STAR Scale Score Comparison

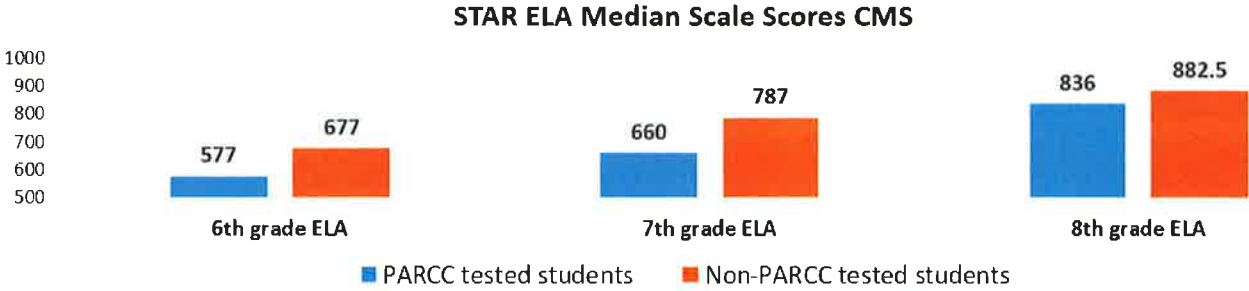
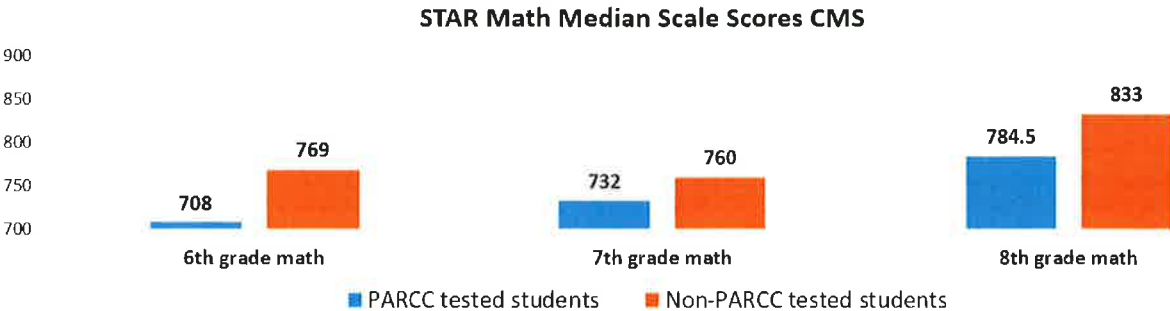


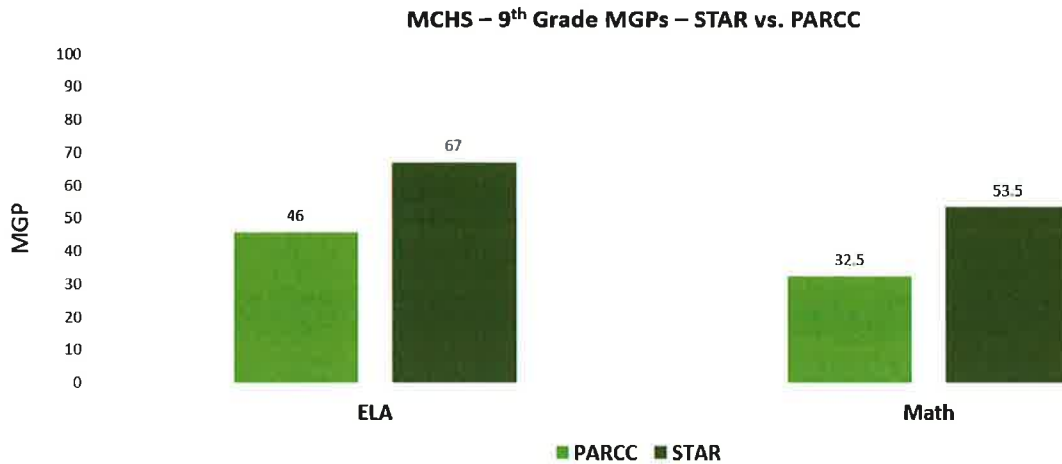
Figure VII – CMS 6th-8th Grade Math Median STAR Scale Score Comparison



Whole School Growth Profile

The next area of analysis involved comparing median growth percentiles between PARCC and STAR with regards to whole school growth profile to answer the question of how the PARCC MGP for each school and grade compared with the STAR MGP. The analysis determined that the District met or exceeded the CDE growth benchmark of 50 MGP for STAR in 7 out of 8 analyzed grades/subjects and exceeded the PARCC MGP by a significant degree in each instance as shown below.

Figure VIII – MCHS STAR MGP and PARCC MGP* comparison for 9th grade students



**Note due to low participation in 9th grade, PARCC growth scores MGP scores are based on 32 students for ELA PARCC MGP and 30 students for Math PARCC MGP*

Figure IX – CMS STAR MGP and PARCC MGP comparison for ELA

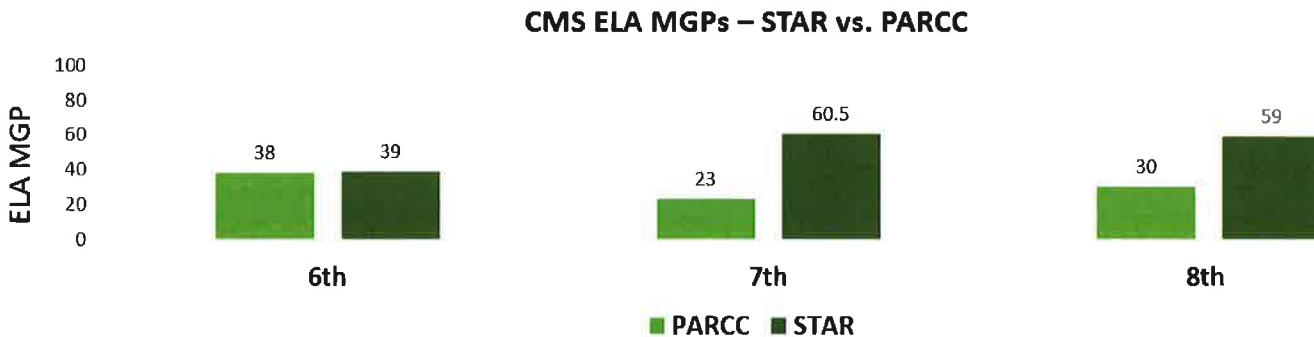
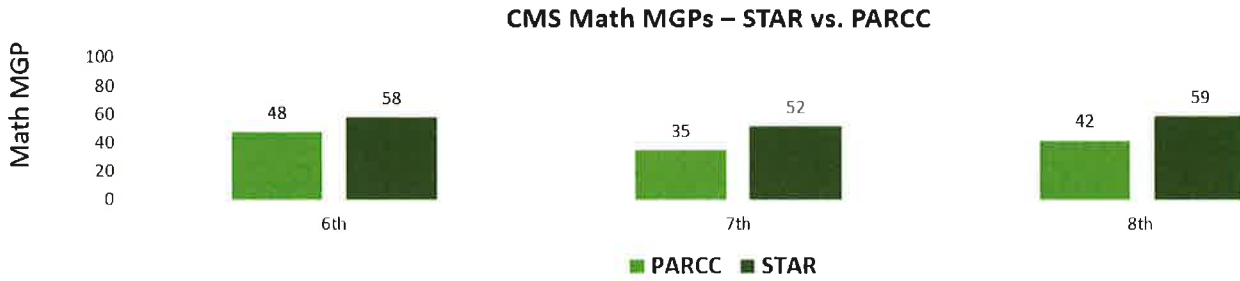


Figure X – CMS STAR MGP and PARCC MGP comparisons for math



Cohort Growth Profile

The District conducted a cohort analysis for STAR growth as well which compared the median growth percentile (MGP) on STAR for the PARCC-tested student cohort and the non-PARCC tested student cohort. In CMS, 5 out of the 6 grades/subjects compared the non-PARCC tested cohort demonstrated a higher MGP on STAR (Figures XI-XII). At MCHS this held true in math but not in ELA (Figure XIII).

Figure XI – CMS ELA STAR MGPs – Comparison of PARCC tested and non-tested cohorts

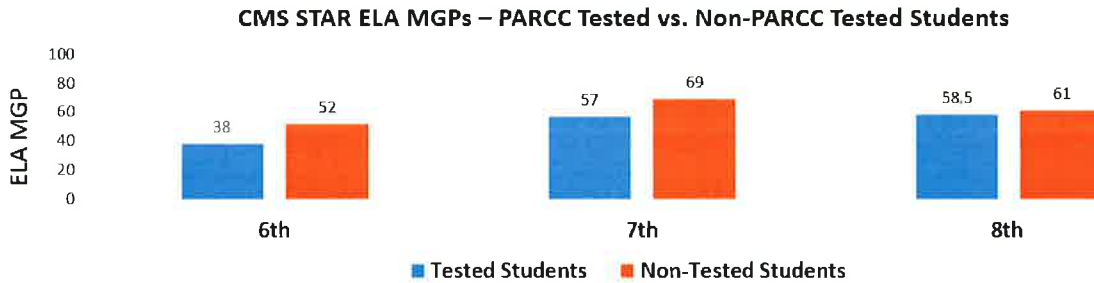


Figure XII – CMS Math STAR MGPs – Comparison of PARCC tested and non-tested students

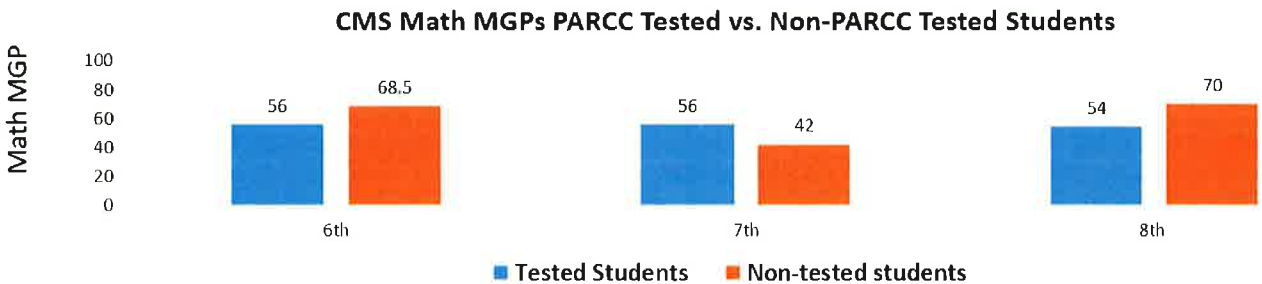
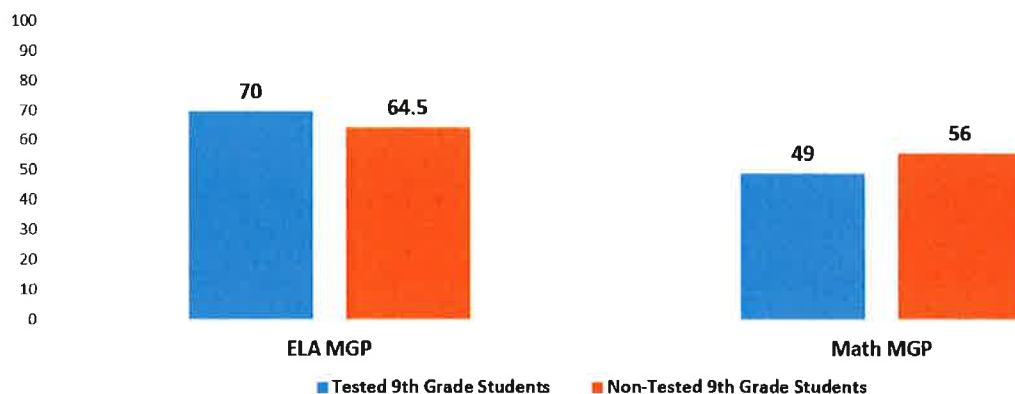


Figure XIII – MCHS 9th grade STAR MGPs – Comparison of PARCC tested and non-tested students

MCHS 9th Grade – STAR MGPs Cohort Comparison of PARCC-tested and Non-PARCC tested students



Predicted Achievement Profile – STAR to PARCC Correlation Analysis

The final analysis that the District conducted utilized a national correlation study that was completed by Renaissance (company that created the STAR Assessment) in order to examine whether there was any correlation between STAR scale scores and PARCC scale scores and whether a student’s STAR scale score could be used to predict the student’s proficiency band on PARCC. The study included an analysis of 14,000 student scores in ELA and 12,000 in math and included students sampled nationally from 7 states including Colorado.

The study found a high level of correlation between STAR scale scores and PARCC scores and also found that STAR scale scores could be utilized to predict PARCC proficiency. Specifically, the study found that when the STAR scale score predicted the student would be proficient this was determined to be accurate 75% of the time for reading and 79% of the time for math. Similarly, when STAR scale scores predicted a student was not proficient this was determined to be accurate 89% of the time for reading and 92% of the time for math. Figure XIV shows the STAR to PARCC scale scores with the PARCC achievement levels across the top of the chart and the corresponding STAR scale scores for each grade. The full study is available [here](#).

Figure XIV – National STAR-PARCC correlation study scale score to performance bands

Table 4a. Equivalent STAR™ score achievement level ranges: Reading

Grade	Level 1	Level 2	Level 3	Level 4	Level 5
3	< 304	304 - 412	413 - 513	514 - 923	>= 924
4	< 335	335 - 441	442 - 570	571 - 1019	>= 1020
5	< 372	372 - 507	508 - 662	663 - 1178	>= 1179
6	< 417	417 - 560	561 - 776	777 - 1251	>= 1252
7	< 467	467 - 614	615 - 829	830 - 1292	>= 1293
8	< 527	527 - 678	679 - 908	909 - 1320	>= 1321

Table 4b. Equivalent STAR™ score achievement level ranges: Math

Grade	Level 1	Level 2	Level 3	Level 4	Level 5
3	< 504	504 - 588	589 - 648	649 - 742	>= 743
4	< 562	562 - 661	662 - 735	736 - 850	>= 851
5	< 614	614 - 720	721 - 804	805 - 901	>= 902
6	< 650	650 - 756	757 - 826	827 - 925	>= 926
7	< 687	687 - 777	778 - 860	861 - 960	>= 961
8	< 739	739 - 815	816 - 875	876 - 1007	>= 1008

The District applied the analysis from this study in an attempt to create a “predicted achievement profile” on PARCC for the CMS students that did not participate in PARCC (note this analysis was not available for MCHS due to the scope of the national study which did not include high school). The intent of this analysis on the part of the District is not to show definitively that this would have been the outcome had these students taken PARCC, since that is impossible, but to continue to triangulate our available data to answer our overarching questions of whether the cohort of students who did not participate in PARCC displayed different performance characteristics than the students who did test in PARCC. The results of this analysis revealed that if every student that did not participate in PARCC had scored in the PARCC proficiency band predicted by their STAR scale score (based on the national study), that the achievement profile of the students who did not participate would have been much different than the tested cohort. Figures XV and XVI show the non-tested cohort’s predicted performance on math and ELA PARCC based on the national study’s achievement level ranges.

Figure XV – CMS Non-Participant Cohort Predicted* PARCC Performance on ELA

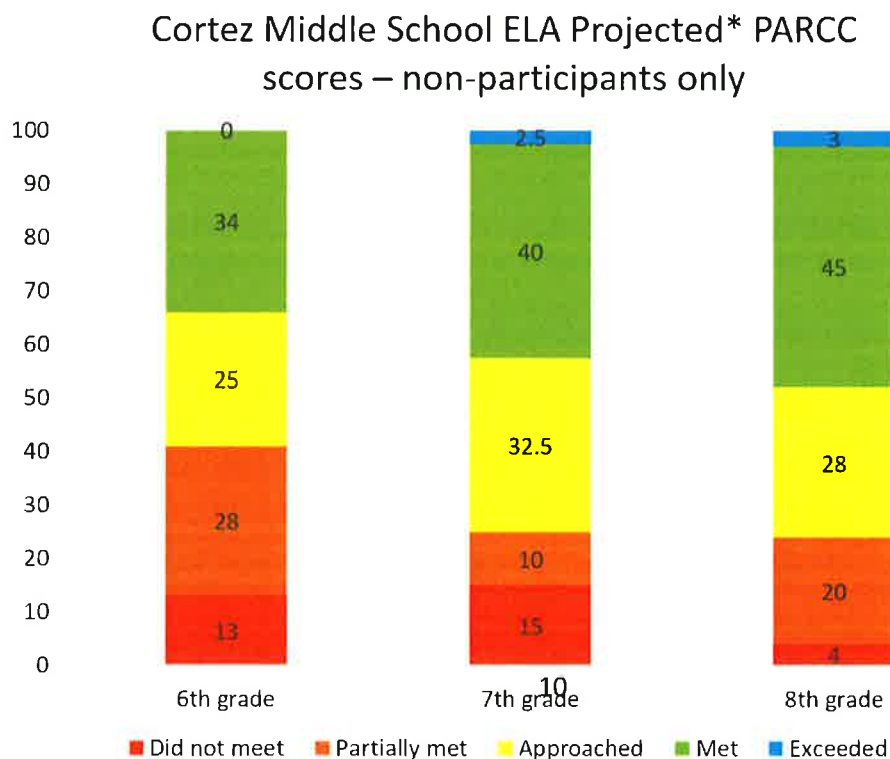
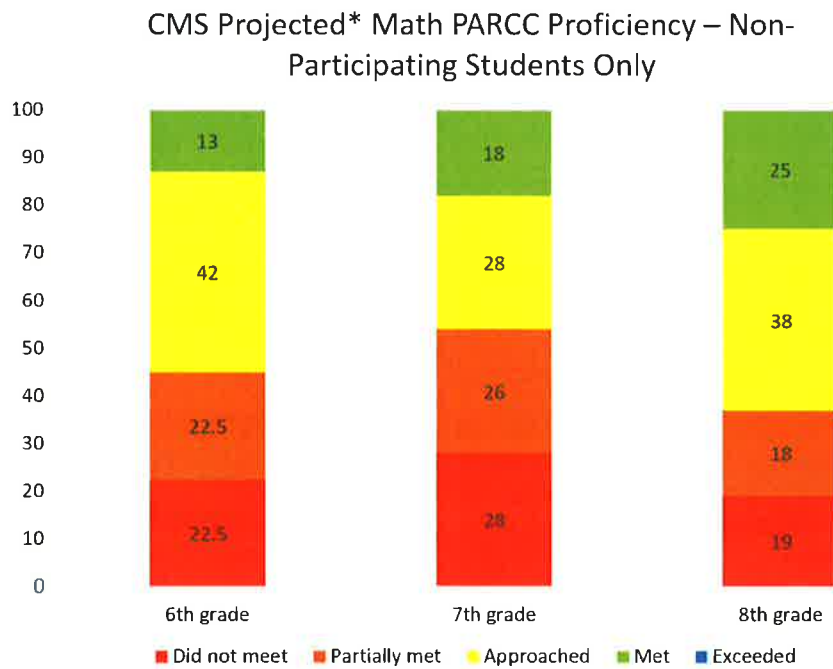


Figure XVI – CMS Non-Participant Cohort Predicted* PARCC Performance on Math



The next phase of this analysis involved integrating these students’ predicted performance with the actual PARCC proficiency performance of the tested students to create a predicted ‘composite’ performance of the Cortez Middle School had all students participated in PARCC. Figures XVII and XVIII show the results for ELA and comparison to actual school performance profile based on PARCC tested students. The largest impact is observed in 8th grade due to the significantly low participation rates (59% participation in 8th grade).

Figure XVII – CMS “predicted” composite performance of all students with inclusion of non-PARCC participating students’ projected PARCC scores – ELA

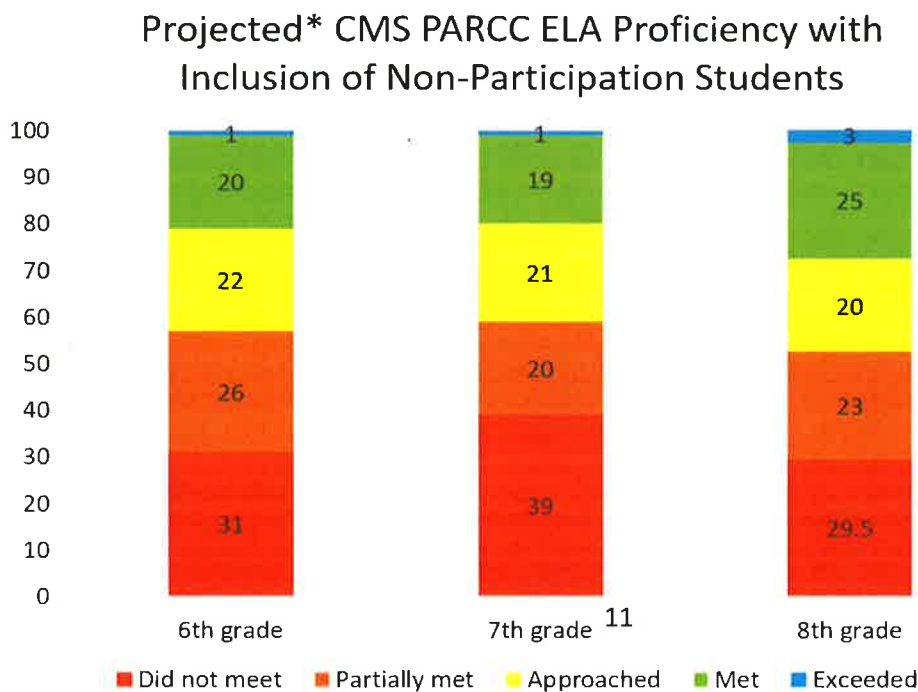
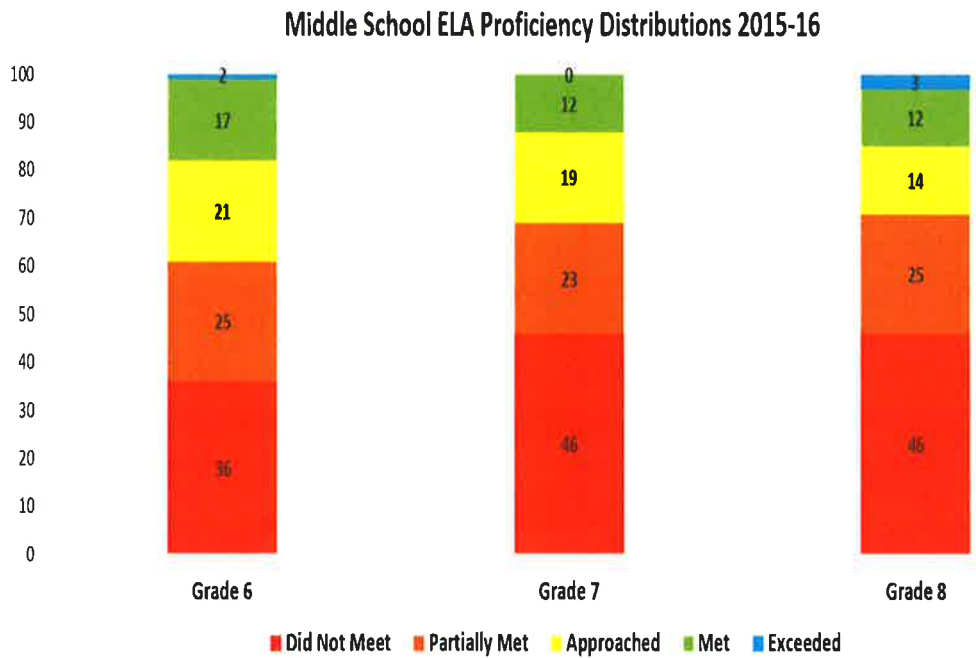


Figure XVIII – CMS actual PARCC performance based on PARCC tested students - ELA



A similar result came from the analysis of the non-PARCC participants’ math STAR scale scores. Figures XIX and XX show that analysis. Similarly, the largest impact is observed in 8th grade.

Figure XIX – CMS “predicted” composite performance of all students with inclusion of non-PARCC participating students’ projected PARCC scores – Math

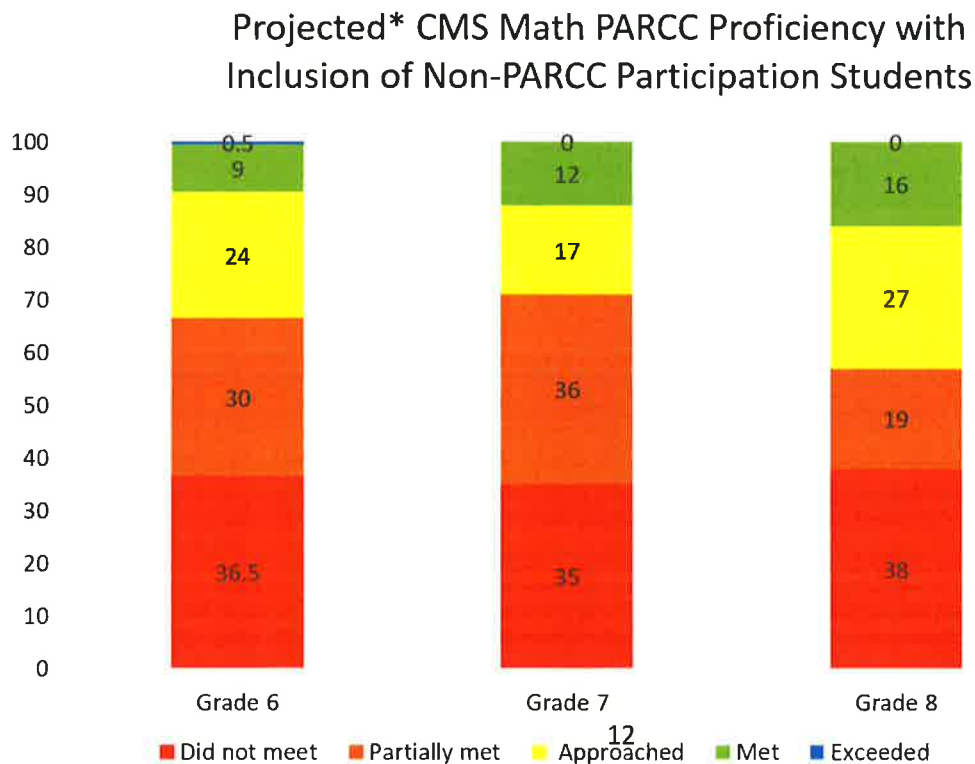
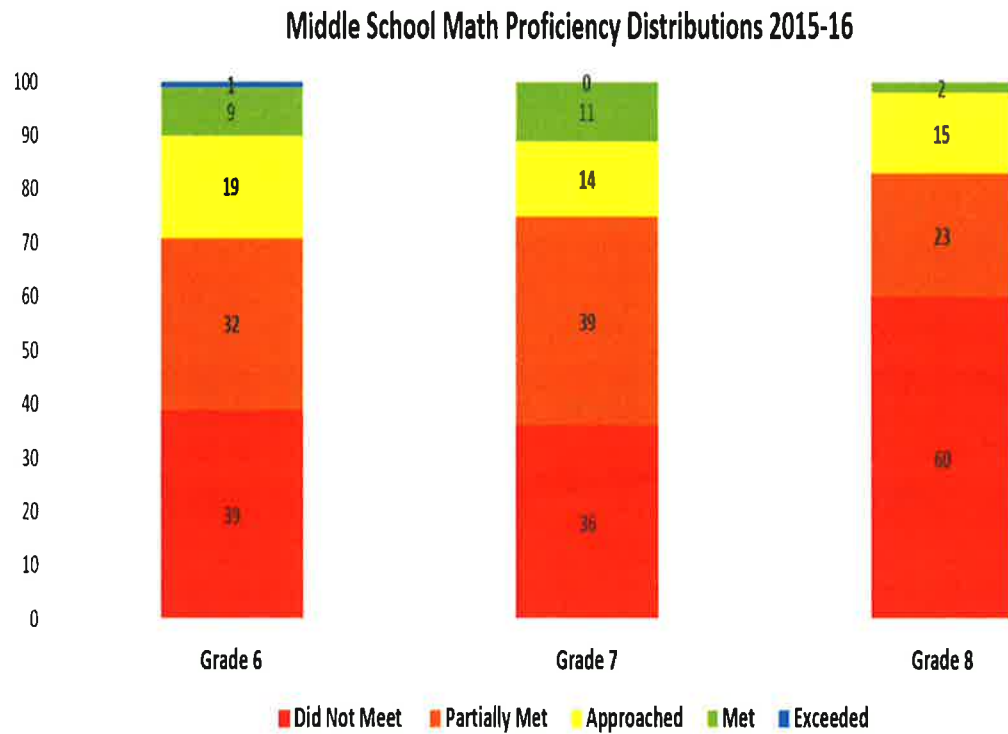


Figure XX – CMS actual PARCC performance based on PARCC tested students – Math



Conclusion

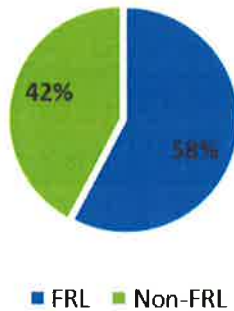
The District engaged in this analysis to determine whether there were substantive differences in the characteristics of the PARCC tested student cohort and the non-PARCC tested student cohort to the best of our ability using available data. The District approached this analysis from multiple perspectives using multiple data sources to try to triangulate data to address this question. As demonstrated in the analysis above the District has concluded that the answer is that the PARCC tested student cohort did differ significantly from the non-PARCC tested cohort in both demographic characteristics and performance profile characteristics. Based on this analysis the District contends that the data reported on the school performance frameworks for the Cortez Middle School and the Montezuma-Cortez High School is not representative of the student population in the school.

Appendix B: District Demographics and Representativeness of Student Population for PARCC-Tested and Non-PARCC Tested Students

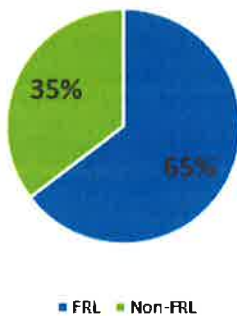
As described in our request for reconsideration the impact of our low participation rates at Cortez Middle School and Montezuma-Cortez High School created a situation in which our CMS and MCHS PARCC data is not representative of our CMS and MCHS student bodies as a whole in terms of both demographics and typical academic performance and growth. However, the impact of this was larger than just in the middle school and high school and significantly altered the demographics of the entire district's tested population cohort for grades 3-9 & 11 as compared to the total enrolled student population for those grades (Figures XXI and XXII).

Figure XXI – Comparison of Whole District Demographics and PARCC Tested and Non-PARCC Tested Demographics- FRL Breakdown

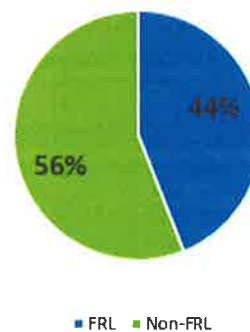
Whole District Demographics Grades 3-9 & 11



PARCC Tested Student Demographics Grades 3-9 & 11



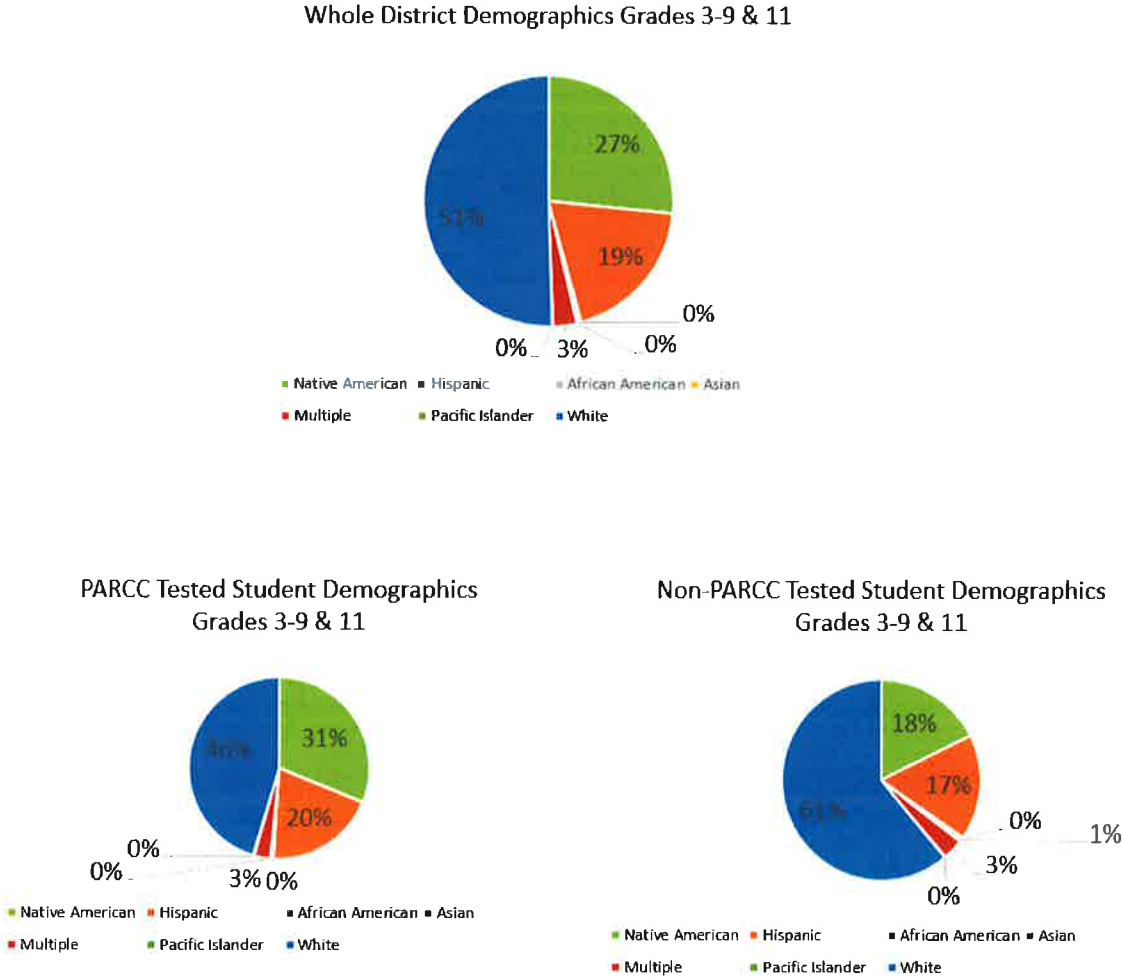
Non-PARCC Tested Student Demographics Grades 3-9 & 11



Specifically, as seen above, the District whole student population for grades 3-9 & 11 is has approximately 58% of students who qualify for free and reduced lunch. This varies significantly from both the full PARCC-tested student population in which 65% of students qualify for free and reduced lunch and the non-participating PARCC eligible students of which only 44% of students qualify for free and reduced lunch.

We see a similar pattern in our comparisons of the whole district population compared to PARCC-tested and non-participating PARCC eligible students when we look at the demographics in terms of race and ethnicity. Figure XXII shows that comparison below.

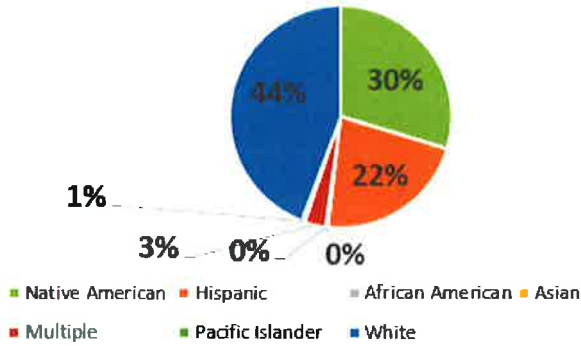
Figure XXI – Comparison of Whole District Demographics and PARCC Tested and Non-PARCC Tested Demographics- Race and Ethnicity Breakdown



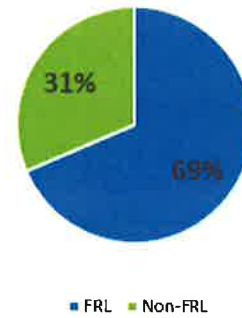
As illustrated above, the PARCC-tested and non-participating PARCC eligible student demographics are very different, particularly as it relates to the percentage of students of color.

Figure XXIV– District PARCC-Tested Cohort Demographics for Grades 3-9 and 11 with CMS, SWOS, and MCHS PARCC Data Removed

Demographics of PARCC-Tested Students Grades 3-9 & 11 with CMS, SWOS, and MCHS Removed



PARCC Tested Student Demographics with CMS, SWOS and MCHS Students Removed



Conclusion

As demonstrated throughout this request for reconsideration and in the attached analysis the District contends that the available PARCC data and resulting school performance frameworks for CMS and MCHS are not representative of the student populations at CMS and MCHS in terms of demographics or performance. When we analyze how this impacted the District-level performance framework in the roll-up of this data we have several observations:

- **Demographic representativeness** -The PARCC-tested cohort of students is not representative of the district as a whole regardless of whether we include or exclude the CMS, SWOS, or MCHS students. Specifically, the elementary and charters students in grades 3-5 are more diverse as a cohort and the PARCC-tested population in grades 6-9 and 11 at CMS and MCHS is significantly more diverse as a cohort than the non-tested cohort in those grades at CMS and MCHS.
- **Performance representativeness** – As demonstrated in the previous analysis, the evidence the District examined suggests that the typical student performance of the tested cohort of students at CMS and MCHS is significantly lower than the non-PARCC tested cohort. Removing the CMS and MCHS PARCC achievement and growth data from the District performance framework would leave our District accreditation resting on our elementary and non-AEC charter growth and achievement and MCHS post-

secondary readiness data. While this is incomplete, we believe it is the best available representation of the performance of our students given the disproportionate impact of low participation due to opt-outs on our middle and high school student performance. While there was some limited opt-out in elementary it was not a significant number across the elementary school cohort as compared to the middle and high school cohorts and we believe it did not significantly impact the representativeness of the elementary data in terms of demographics or performance overall.

- **Proportional representation of enrollment** – In our 2015-16 October count data, 48% of our total enrollment is in elementary, 24% is in middle school and 28% is in high school. Overall distribution in grades that are covered by PARCC testing and PSR indicators in grades 3-9 and 11-12 is different from overall October count enrollment percentages. Specifically, for students for whom we have school performance data (PARCC, PSR) in grades 3-9 and 11-12, 40% of all these students are in elementary, 29% are in middle school and 31% are in high school. Removal of the MCHS and CMS PARCC data and SWOS data from the District performance framework, while retaining elementary and non-AEC charter growth and achievement and MCHS post-secondary readiness data would result in a District Performance Framework that includes performance data on a majority (66%) of those students in grades 3-12 for whom we have available data. The District contends that this would also be the best option for being representative of the remaining schools' and/or grades' populations in terms of demographics and performance (elementary, non-AEC charters, and MCHS PSR).

Due to the impact of low-participation in middle and high school, the District finds itself in a situation as described throughout this document where there is no viable option for creating a District Performance Framework that is fully representative of our entire student population in grades 3-9 and 11 either in terms of demographics or performance. Furthermore, the inclusion of this non-representative data is creating an incomplete and inaccurate accreditation rating for CMS and MCHS and rolling that data up into the District is adversely impacting the accuracy of the District Performance Rating. Given this situation, the District is requesting the removal of the data that created the most significant impact on representativeness of student cohorts – which is occurring at the middle and high school levels. For SWOS, while we have not yet seen the AEC preliminary framework due to delays in this release, we are requesting that this data be excluded from the District Framework to avoid a disproportionate impact of AEC data on the District overall framework. Therefore, the District is requesting that CMS and MCHS PARCC data and all SWOS data be removed from the calculation of the District Performance Framework and that the District Performance Framework be calculated based on Elementary and non-AEC charter Growth and Achievement and MCHS Post-Secondary Readiness measures.