

March 13, 2017

Commissioner Katy Anthes
Colorado Department of Education
201 E. Colfax Ave.
Denver, CO 80203



Dear Commissioner Anthes,

Thank you for the opportunity to provide feedback on Colorado's Plan to implement requirements in the Every Student Succeeds Act (ESSA). We at A+ Colorado believe that involving and engaging communities in public education is essential to improving outcomes for students.

We echo the recommendations in the Equity in Colorado Coalition's letter, to which we are one of 24 signatories. We would like to underscore the importance of several of the recommendations included in the Equity in Colorado Coalition letter, and to provide additional feedback.

We see ESSA as an opportunity to affirm and advance Colorado's commitment to ensuring every student in our state can reach the critical academic expectations necessary to thrive in today's world. We believe Colorado has taken important steps over the past two decades to work toward this vision. Below are the key values we believe could be better reflected in the Plan if we are serious about ensuring every student can access an excellent education.

Colorado's goals for our students, schools, and districts—and the accountability system that measures progress toward those goals-- should reflect the state's expectations for what every student should know and be able to do.

In the draft ESSA Plan, Colorado reaffirms its "complete commitment to college- and career-ready standards" such that each student in the state's public education system "is prepared to compete academically and economically within the state or anywhere in the nation or the world." Yet, in both its structure, and who is included in the count of students, the proposed accountability system leaves many students out of this promise.

First, in setting long-term goals for students, we see an opportunity for the Department to be more thoughtful about interim measures for groups of students to reach the goals, and the strategies that will enable students to get there. We believe these goals should be guiding the implementation of the Plan. Yet even where the interim targets are outlined in the Appendix, the Plan seems to disregard the current achievement of different student groups. Considering the varying baselines for each subgroup, students will also need to make varying rates of progress to close gaps. We ask that the Department make ambitious commitments to our historically underserved students through both long-term goals and interim measures, explicitly define the interim measures for different groups of students, and map out how the Department will support and hold accountable districts and schools such that students can achieve those targets.

Second, the accountability system set forth in the Plan is almost entirely normative, where students, schools, and districts are evaluated on what they can do compared to other students, instead of on what

students know and can do. This is particularly inequitable for students who have not historically been expected or given opportunities to succeed at the levels of their more privileged peers. We believe these normative measures, including (a) the shift to average scores to measure student achievement, (b) the reliance on median growth without plans to incorporate adequate growth measures, and (c) indicator-level cut scores, overall cut scores, and long-term goals based on percentile ranks, will lead to less transparency and lower expectations, especially for students of color and low-income students. While there is value in each of these metrics and methods individually, combined in the current structure it is possible that schools and districts will receive the state's highest ratings without students meeting the expectations Colorado has been establishing for 20 years. We ask that the Department reconsider the metrics and cut scores used in the accountability system such that it asks schools and districts to prepare students for college and career success, not just to be better than the school down the street or on the other side of the Continental Divide.

Third, Colorado's suggested approach to address assessment participation rates is inconsistent with the Every Student Succeeds Act, which requires that districts and schools assess at least 95 percent of students across a state. The 95 percent participation provision of federal law originated to protect the most vulnerable students, specifically students with disabilities, by ensuring their inclusion in statewide testing. As such, we recommend the state count every student in participation rate calculations, including all non-participants, to increase transparency and demonstrate a concerted effort to assess and report meaningful data about every child. We further recommend that the state reenact policies, in line with current state statute, that direct specific consequences for schools and districts with participation rates below 95 percent.

A critical value of Colorado's education system should be ensuring communities, including families, educators, advocates, and policymakers, understand what is working—and not working—for students such that, as a state, we can leverage and share lessons learned so more students receive an excellent education.

We believe the legislative intent of ESSA was to raise the bar for information sharing, making the system more transparent to families, educators, and policymakers. Colorado has indeed been a leader in providing data and information about schools to families, communities, and policymakers. Yet we are concerned, particularly given recent practices of changing data reporting rules and delaying data releases, that Colorado is not affirming its commitment to providing required information about schools to communities.

First, the Department's plans for collecting and releasing data is notably absent. We ask the Department to include in the Plan: (a) how it plans to comply with data release requirements; (b) how it plans to present and release data and school performance information to communities, including families (inclusive of non-English speaking families and families without internet access), educators, policymakers, and researchers; and (c) how it plans to consult with these communities about how data is released and presented.

Second, in the Department's recent introduction of new data suppression rules, it is significantly more challenging, if not impossible, to tell how students are being served by the education system, doing a disservice to both students and systems. This information is critical to not only understanding gaps in the opportunities students across the state can access, but also to learning and sharing lessons about

what is working for students. We cannot improve and support education if we do not know how students are performing. We believe including the new suppression rules in Colorado's ESSA Plan goes above and beyond federal requirements and cements a practice that needs much more thought, stakeholder involvement, and iteration before implementation.

Third, we believe the Colorado Department of Education should better outline how it plans to evaluate the progress and impact of school improvement strategies, and to share lessons learned with schools and districts across the state. ESSA is intended to establish systems that consolidate resources for greater impact on students, with the expectation that programs should be changed if there is no impact. The outlined Plan focuses on compliance, rather than understanding the impact of dollars on student outcomes. For example, while the Plan says that "CDE uses clear and consistent criteria-monitoring indicators—to determine the degree of implementation of LEA programs and activities," the Plan does not outline what those criteria are (p. 34). We believe the Plan should instead focus on processes to gather information about implementation and interventions on the ground, as well as cost-impact analyses. As a key step towards this, the department must ensure it collects the information that will enable meaningful evaluation, and involve educators, evaluators, and communities in implementation and evaluation processes. The Plan should also identify clear forums for sharing and scaling promising practices.

The Colorado Department of Education is well positioned to set a vision for Colorado students, to support districts and schools to achieve this vision, and to ultimately ensure that every Colorado student receives an excellent education. We hope conversations about how the state implements the Every Student Succeeds Act clarifies this vision, and deepens the Department's engagement with communities across the state. A+ Colorado looks forward to partnering with and supporting the Department, districts, and schools to dramatically increase student achievement across the state, with the ultimate goal that a child's zip code, family income, or racial identity no longer dictates his or her educational opportunity.

Thank you,

A handwritten signature in black ink, appearing to read 'Van Schoales', with a stylized, cursive script.

Van Schoales,
CEO, A+ Colorado