# Second Draft Full Report: Colorado Accountability, Accreditation, Student Performance and Resource Inequity Task Force

DRAFT

# I.    Introduction

## A.  Letter from the Chairs

Dear Reader,

The Colorado General Assembly created the Accountability, Accreditation, Student Performance and Resource Inequity Task Force through H.B. 23-1241 "to study academic opportunities, inequities, promising practices in schools, and improvements to the accountability and accreditation system."[1]

This Task Force engaged in 15 full Task Force meetings, 25 additional small group meetings between members studying elements of the accountability system, and stakeholder engagements. In these meetings, the group considered academic opportunities and inequities that may be impacting achievement gaps, and improvements to Colorado's Education Accountability System to expand and incentivize academic opportunities and address these inequities.

The report that follows—submitted to Colorado's Education Committees of the House of Representatives and Senate, the Governor, the State Board, the Commissioner of Education, and the Colorado Department of Education (CDE) — shares our learning along with ## recommendations. The recommendations, informed by evidence and rigorous analysis, are meant to preserve what is working and address inequities between students. These recommendations will make the accountability system a true roadmap for improving schools and, ultimately, opportunities and outcomes for Colorado's diverse student body and school communities.

We want to thank all 26 Task Force members for their dedication to our charge and their commitment to this work since August 2023. The Task Force was made up of a diverse set of seasoned and passionate education stakeholders appointed by the state's legislature in a bipartisan way. They held a variety of experiences, perspectives, and opinions representing the needs and priorities of school and district leaders, educators, parents, students, advocates, and other education stakeholders across the state. And by exploring, listening, compromising, and developing recommendations—together—we believe the state is well-positioned to improve our accountability system to benefit all of Colorado's students.

We look forward to engaging further with Colorado's education leaders as they consider these important and timely recommendations.

Sincerely,

Dr. Wendy Birhanzel and Hon. Rebecca McClellan

1241 Task Force Chair and Vice Chair

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[1] Colorado General Assembly (2023).

## B. Executive Summary

*Roll up of Findings and Recommendations*

## II. Background

### A. Task Force Charge and Membership

Per H.B. 23-1241, the Colorado Accountability, Accreditation, Student Performance and Resource Inequity Task Force was created "to study academic opportunities, inequities, promising practices in schools, and improvements to the accountability and accreditation system."[2] To see the full text of the statute, see Appendix A.

There were 26 bipartisan, geographically diverse education stakeholders on the Task Force appointed by various Colorado state government members. The Task Force members represent the viewpoints of superintendents, principals, teachers, parents, students, advocates, school board members, and communities across the state. To see the full list of Task Force members, what stakeholders they represent, and who they were appointed by, see Appendix B.

### B. Overview of Colorado's Education Accountability System

Colorado's Education Accountability System is designed to "(a) provide valid and actionable information regarding the progress of all students toward meeting academic standards and (b) prioritize support for schools and districts identified for improvement." This design complies with the federal Every Student Succeeds Act (ESSA), which requires that states provide critical information to stakeholders through annual assessments and identify and intervene in low-performing schools.[3] [4] Similarly, Colorado state statute requires the State Board of Education to "Appraise and accredit public schools, school districts, and the State Charter School Institute." CDE is the administrative arm of the State Board and is responsible for holding districts and schools accountable for performance. Each year, the state issues district performance ratings. These ratings help identify high-performing districts and schools to disseminate best practices and identify low-performing schools and districts to offer direct additional resources and support or initiate corrective action if low performance persists over time.[5]

Colorado's Education Accountability System consists of the following elements:[6]

- **Performance Frameworks:** Performance frameworks provide a statewide evaluation of student performance using indicators based on academic achievement, growth, and postsecondary workforce readiness (PWR) data. CDE uses the points earned through the performance frameworks to assign performance ratings to schools and districts. Schools receive one of four ratings called plan types, and districts receive one of five accreditation ratings. The following table defines what each of the three framework indicators currently consists of, and the charts

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[2] Ibid.
[3] U.S. Department of Education (n.d.).
[4] EducationWeek (2016).
[5] HumRRO (2022).
[6] Colorado Department of Education (2023).

show what weight each indicator has on the performance frameworks at the elementary, middle, high school, and district levels.

| Performance Indicator | Performance Data Included |
|---|---|
| Academic Achievement | <ul><li>Mean scale score on English language arts, math, and science assessments</li><li>Overall and for disaggregated groups</li></ul> |
| Academic Growth | <ul><li>Median student growth percentile on English language arts, math, and English language proficiency assessments</li><li>English language proficiency on track metric</li><li>Overall and for disaggregated groups</li></ul> |
| Postsecondary and Workforce Readiness (PWR) | <ul><li>SAT Evidence-based Reading & Writing and Math</li><li>Graduation rate</li><li>Dropout rate</li><li>Matriculation rate (includes military enlistment and industry credentials)</li><li>Overall and for disaggregated groups (except for Matriculation rate)</li></ul> |

**Performance Indicators Weight Distributions**

*Elementary and Middle Schools*
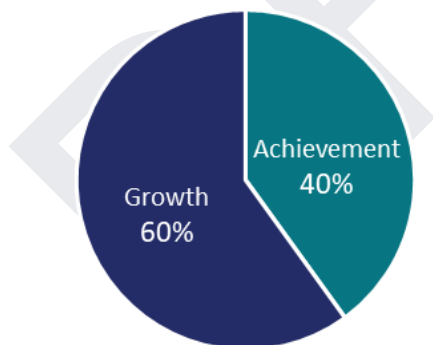
*High Schools and Districts*
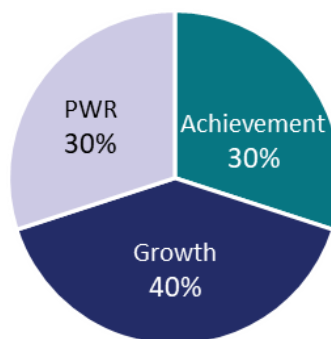


- **Public Reporting:** Public reporting includes interactive data visualizations and reports using accountability system data. These publicly available reports offer results from the application of

accountability frameworks and beyond. For example, they include data on enrollment, demographics, achievement, growth, and PWR over time.

- **Improvement Planning:** Building on a continuous improvement approach, schools and districts have multiple state, federal, and grant improvement planning requirements and receive support for their performance management efforts. Appropriate resources are matched to their needs.
- **Public Engagement:** All schools and districts are required to have accountability committees that provide recommendations to principals and local boards.
- **Supports and Interventions:** The state offers support and resources through the State Support System to schools and districts that are on or are approaching the accountability clock, meaning they are not meeting expectations on the performance frameworks. Supports are matched to meet local needs, which can include CDE staff support and the Empowering Action for School Improvement (EASI) grant. The state's needs assessments drive the State Support System, and supports are distributed using universal, targeted, and intensive tiers. District participation in the State Support System is voluntary but encouraged.
- **Accreditation:** The State Board of Education is responsible for the annual accreditation of districts based on performance frameworks and other provisions. These provisions relate to budget and financial policies and procedures, accounting and financial reporting, school safety and the Gun Free Schools Act, and the periodic review and adoption of curriculum standards that meet or exceed state standards. The state board also assigns plan types to each school, but ultimately, local Boards of Education and the Charter School Institute have the authority to accredit schools.
- **Awards:** Schools and districts can receive state awards for exemplary performance, such as academic achievement or growth scores.

## III.   Task Force Activities

### A.   Task Force Meeting Cadence and Structure

From August 2023 to November 2024, the full Task Force met 15 times, and small groups met XX times to conduct their work in accordance with the legislative charge. A more detailed description of meeting structures and the cadence of the Task Force's work can be found in Appendix C and in the Interim Report, linked in Appendix D. An overview of Task Force meetings objectives and agendas is in Appendix E.

### B.   Task Force Consensus Process and Study Group Membership

To develop the findings and recommendations outlined in this report, at the start of 2024, Task Force members organized into "study groups" focused on various aspects of the accountability frameworks, other elements of the accountability system, and additional topics relevant to the Task Force's charge that were raised during Task Force meetings and deliberations for further study. Though the Task Force

conducted its work in these smaller groups, feedback from all Task Force members was solicited and incorporated into the background content and recommendations included in this report.

Task Force members used the feedback to make adjustments to their findings and recommendations with the goal of reaching a consensus on all recommendations included in this report. All Task Force members are presenting this report in agreement unless otherwise noted. For more information about the Task Force consensus process and membership in the study groups, see Appendix F.

### C. Task Force Considerations and Activities

In line with H.B. 23-1241, the Task Force considered essential components of Colorado's Education Accountability System, past efforts to evaluate the state's accountability system, and other educational priorities to study the accountability system and develop recommendations.

*Academic opportunities or inequities*

The statute required the Task Force to consider "**academic opportunities or inequities that may impact academic achievement gaps.**" Though this report offers recommendations to improve the accountability system in a way that advances academic opportunities and inequities, the Task Force strongly believes the accountability system alone cannot advance academic opportunities or prevent academic inequities. More must be done outside of the accountability system to ensure every Colorado student attends a school with high-quality teachers, strong curriculum and instruction, adequate funding, strong governance; modern, safe, and welcoming facilities and transportation; and an ecosystem that supports the work of schools, such as direct services and access to health and wellness supports. Critical ways to advance academic opportunities and address academic inequities are through allocating and effectively using resources by local school boards in response to community needs, allowing for innovation and replicating best practices.

During its meetings, the Task Force generated a list of academic opportunities and inequities that may impact academic achievement gaps, organized into one list of "resource categories." They also generated examples of how these opportunities and inequities show up in schools and districts and how some schools and districts successfully mitigated these inequities. The table below outlines the list of resource categories the Task Force generated and examples of how these resources manifest in the form of academic opportunities or inequities in Colorado's schools and districts.

| Resource Category | Examples of Resource Inequities |
|---|---|
| **Personnel:** High-quality, well-trained, and experienced staff who have time and resources for ongoing professional learning and collaboration; the opportunity for innovation; and skill working with all | <ul><li>Not being able to hire a math teacher for multiple years due to fiscal and geographic limitations led to extensive use of online education</li><li>Some districts have grant writers to gain more personnel or support; in other districts, the grant</li></ul> |

| | |
|---|---|
| students, including English Language Learners (ELLs), those with an Individualized Education Program (IEP) and students who have unfinished learning. | ● writer is the principal or bus driver<br>● Some districts have funds for teachers to create curriculum outside of the school year; many don't, which leads to stale and ineffective curriculum |
| **Curriculum and Instruction:** High-quality, culturally relevant instruction and tasks aligned to state standards; postsecondary/advanced learning opportunities; grade-level instruction and tiered supports; and high-quality assessments. | ● Not all districts have access to training to implement new reading curriculum and instruction<br>● There is no transparency around what high-quality instructional materials or curriculum districts use<br>● Before and after school child care, i.e., Boys and Girls Clubs, can provide additional opportunities to catch students up on material |
| **Funding:** Provides adequate access to resources and helps meet priorities; includes grants, state and federal funding, donations and fundraising, and community or private partnerships. | ● Rural areas have trouble attracting and retaining high-quality, certified teachers; pay scales cannot keep up with the cost of living<br>● Many services are done through grants, which favor larger and wealthier districts<br>● In areas with lower home values and limited commercial enterprises, funding from local property taxes is nearly nonexistent |
| **Governance:** Local and state policies, laws, priorities, and incentives to protect students and enable educators to meet student needs. Districts and schools should be empowered to allocate resources to meet students' particular needs. | ● It takes money and networks to run for and be elected to school boards; this can drive inequity<br>● Bills from the legislature are not always in tune with district needs<br>● There is inequitable access to resources that support good governance and an understanding of the key issues facing decision-makers |
| **Facilities and Transportation:** Student access to high-quality, modern facilities and transportation that allow them to access resources and supports. | ● Not all students have equal access to transportation, which limits school options<br>● Charter schools are often separated from district economies of scale, which limits their resources |
| **Family and Community Supports:** Schools have access to external assets, including strong culture, community school models, parent/family engagement, and support from postsecondary and business. | ● For families whose first language is not English, it can be difficult for them to engage with schools<br>● There is a high level of chronic absenteeism across the state; some reasons include transportation, COVID transmission, and messaging |

*Improvements to the accountability system*

The Task Force was also required to consider **"improvements to the accountability and accreditation system to expand and incentivize academic opportunities and address inequities."** The Task Force engaged CDE to gain an in-depth understanding of the elements that make up Colorado's accountability system to consider potential improvements. In one Task Force meeting, CDE guided the Task Force through an exercise to examine correlations between accountability framework results and different student demographics. CDE shared data demonstrating a high correlation between free and reduced lunch and achievement scores. To review further findings from this analysis, see Appendix G.

To further inform the Task Force's learning, CDE also provided a brief overview of how participation in state assessments impacts a school or district's results on accountability frameworks. They also created the Accountability Reference Handbook for the Task Force, which tracks all questions asked by the Task Force to CDE and CDE's responses to these questions to inform the Task Force's deliberations. See Appenddetails and I, respectively, for more details about these resources shared by CDE.

*Resources the Task Force May Review*

In addition to what the Task Force was required to consider, the statute also listed a number of resources the Task Force may review to inform its study of the accountability system. Many of these resources also served as **"promising practices in schools and districts"** that the Task Force was required to consider throughout its work. The additional resources the Task Force considered included:

- **"The results of the statewide education accountability systems audit."** The audit found that the "performance indicators and measures used in Colorado's statewide education accountability system provide a reasonable and appropriate basis for objectively measuring the performance of districts and public schools." However, the audit also points out inequities and areas for improvement in the current accountability system.[7]
- **"The local accountability systems"** and "**the results of the Local Accountability Systems Grant program."** Local accountability systems offer another avenue to hold schools and districts accountable for student outcomes while honoring the unique contributions these schools and districts offer their school communities. The evaluation of the Local Accountability Systems Grant found that the grant successfully helped schools and districts develop new valid and reliable measures of local goals for use in local accountability systems. See Appendix J for more information about the Local Accountability Systems Grant, participating districts' projects, and the evaluation.
- **"The results of the School Transformation Grant program."** The Task Force learned about the interventions that can support the improvement efforts of Turnaround Schools and the conditions and practices that can lead to better outcomes in these schools.

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[7] HumRRO (2022).

- **"The interim and final reports from the Secondary, Postsecondary, and Work-based Learning Integration Task Force."** Task Force members heard from representatives of the 1215 Task Force who made recommendations for the accountability system's PWR indicator relevant to the 1241 Task Force's own deliberations and recommendations. See Appendix K for a summary of the 1215 Task Force's recommendations for the accountability system's PWR indicator and an overview of their stakeholder engagement process.
- **"Promising practices from other states as identified by Task Force members."** The Task Force reviewed how other states have approached accountability and accreditation while still meeting federal law requirements.
- **"Leading indicators or instructional practices that could be added to the accountability measures."** The Task Force discussed the importance of instructional practices and the leading indicator of shifting adult practices during their discussions on the opportunities and inequities that are required for all schools to succeed.

For more details about the Task Force's discussions on each of these resources, see Appendix L.

*Recommendations for legislation or rules, as necessary*

After extensive learning about the state's education accountability system, the Task Force members considered what was working and what could be improved for each element. These considerations served as the foundation for the topics the Task Force prioritized to study in greater detail and develop recommendations for through their study groups. Study group assignments can be found in Appendix F. The next section of this report outlines the Task Force's recommendations for legislation or rule change to improve the accountability system.

### D. Stakeholder Consultations

H.B. 23-1241 also required the Task Force to "consult with parent organizations, student organizations, and additional stakeholders as needed to address questions necessary to finalize its findings and recommendations."[8] The Task Force conducted its stakeholder consultations in three primary ways:

- Panels conducted during Task Force meetings with fellow Task Force members, teachers, and parents
- A public comment survey disseminated in both English and Spanish
- Additional interviews and focus groups conducted with parents, students, educators, and other community stakeholders by the Task Force either during publicly scheduled Task Force meetings or in individual settings (e.g., parent advisory councils, board meetings)

For additional information on how these stakeholder consultations were conducted and who was consulted, see Appendix XX.

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[8] Colorado General Assembly (2023).

## IV.    Findings and Recommendations

Colorado's education accountability system is based on the belief that every student should receive an excellent education and graduate college- and career- ready. The state's accountability system currently provides an opportunity to elevate the great work happening in schools across our state and encourage schools to offer more robust, high-quality options for their students. To this end, any effort that focuses on the state accountability system needs to enhance what is already working for Colorado students and educators and remedy concerns by suggesting ways Colorado's accountability system can further advance academic opportunities and address inequities.

The following recommendations are guided by research and the rich expertise of this Task Force's cadre of practitioners, educators, leaders, parents, and advocates. While some recommendations may require a nuanced understanding of the state's accountability system, the major takeaways should be:

- Colorado's accountability system, at both the district and school level, must account equitably for all students;
- Accountability must be administered with consistency, fidelity, and reliable comparability;
- Disaggregated student-level data is important to identify and address opportunity gaps;
- The accountability system should be a roadmap for improvements across all schools, but particularly in service of our most historically underserved students;
- The accountability system must be transparent when reporting to all stakeholders; and,
- Growth is the single best measure of how schools and districts meet individual student needs.

### A.    District and School Performance Frameworks

To advance equity in education, Colorado's accountability system strives to strike the right balance of offering comparability between schools and districts while accounting for varying resource and contextual factors – such as differences between rural and larger school systems. Many factors go into assigning school and district framework ratings that, in turn, must provide public reporting that offers transparency on how students are doing across various demographic groups. The Task Force identified multiple opportunities to strengthen the accountability system's ability to advance equity by identifying the following opportunities and challenges.

| Challenge | **Current thresholds used to calculate results contribute to data suppression, impacting ratings and public reporting.** |
|---|---|
| | *See Recommendation 1 for solution* |

The public needs a full picture of how schools perform, especially for students from historically underserved groups and small, rural schools and districts. These student groups can represent a smaller percentage of the overall student population in schools and districts. While all students are counted in the overall indicators, disaggregated groups will not be reported and count for points if there are not

enough students within a particular demographic to meet state or federal thresholds (which vary as described below). If enough students are in the "all" category for all performance indicators, the site will get a plan-type assignment.

The accountability system has rules set by CDE policy to protect student privacy when reporting results. When a school or district has too few students of a defined population (e.g., by race, free-reduced lunch status, students with disabilities) either at the school level or among distinct groups of students, the accountability system suppresses those students' results from statewide public reporting. In Colorado, the thresholds [From Ryan: We didn't talk about this but there have been updates to how CDE reports on graduation rate and dropout rate data and we may want to mention those minimums as well as they also have an impact on the framework.] for determining whether to report on a student group's results publicly are:

- At least 16 students must have state assessment data for academic achievement (n<= 16)
- At least 20 students must have state assessment data for academic growth (n<= 20)

Colorado adopted these minimum numbers under its No Child Left Behind (NCLB) Flexibility Waiver after in-depth data analyses by CDE staff and in consultation with CDE's Technical Advisory Panel (TAP). Moving forward with its ESSA plan, CDE consulted extensively with stakeholders from large and small districts, parents, advocacy groups, teachers, and school administrators through its Listening Tour, Accountability Spoke Committee, and Hub Committee and public survey responses to Colorado's state plan. Concerted efforts to strike a balance between as much accountability for schools and disaggregated groups as possible while maintaining student data privacy and statistical reliability yielded renewed support for the current 16 (achievement and graduation rate) and 20 (growth) minimums.[9]

Different reporting thresholds can be used for federal reporting and state [confirm this statement is clear/accurate] accountability, and states can choose a reporting threshold as low as ten students for federal reporting purposes. Other states use lower thresholds than Colorado (e.g., Texas uses n<=10) for state accountability reporting, and some states use higher thresholds (e.g., #####). [add example of states with higher thresholds]

CDE's current approach to addressing issues caused when the number of students in a particular group falls below CDE's threshold is to (i) aggregate and publicly report data of that student group over a three-year period and (ii) generate multi-year frameworks for those school systems. However, this approach fails to ensure all schools and districts have reportable data for all performance indicators. The unintended consequences vary, but an important one to note is that certain student groups' results could be hidden behind the overall performance of the school or district.

When schools fail to have reportable data for all performance indicators, the school system is assigned Insufficient State Data (ISD) ratings. An ISD plan type is automatically assigned if the total participation rate is at or below 25% for English language arts/Evidence-based reading, writing, and math. An ISD plan

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[9] Colorado Department of Education (2023)

type is also applied if reportable data are unavailable for all applicable performance indicators (i.e., achievement, growth, and postsecondary and workforce readiness). For multi-level schools (i.e., combined elementary, middle, and/or high schools) and districts, ISD is assigned if one or more EMH levels do not have reportable data for either achievement or growth. Schools and districts have the opportunity to request an ISD plan type if they have below 85% total participation on state assessments and can establish that the results are not representative of the full student population through the request to reconsider process.[10]

In 2023, using preliminary [from Tammi: Don't we have final frameworks now? (Or will have final by time of publication– if so, update with 2024] frameworks, 32 districts were assigned an ISD rating, which is higher than usual due to the pandemic pause in assessment.[11] In 2019, no district received ISD. One district (Agate) could choose its rating in 2019 because even after three years of data, it still did not have enough data to report publicly.
- Additional data requested for this section:
  - estimate of how much overall data is masked (i.e. what percentage of the overall student population) as a result of current n-size practices?
  - How many instances exist where there is combining and what percent of our schools do that?
  - How many schools/districts have ratings but have suppressed data for subgroups because of the n-size policy decisions? Put differently, if n-size thresholds were lowered, how many more students could we see data for?

In addition, if a subgroup just reaches CDE's student threshold, this group will still account for the same amount of points in the performance frameworks as another group that is many times larger. [from Ryan: Just confirming that I'm clear here. For example, a school may have 21 students with growth scores who are multilingual learners and 100 students with growth scores who are eligible for free- or reduced-price lunch, and each group will have the possibility of 1 point on the framework. If this is the case, we may want to add some additional detail.]

| Challenge | **Even while striving to design an accountability system that minimizes the impact of inequity on historically underserved students and schools, ratings are still too influenced by factors outside of a student's or school's control.** *See Recommendation #2 for solution* |
|---|---|

Currently, points are distributed for academic achievement and academic growth on assessments for all students and for the performance of individual subgroups, including free/reduced-price lunch-eligible students, students of color, multilingual learners, and students with an IEP. Because students can belong to more than one of these subgroups, their assessment data may be scored and considered for points

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[10] Colorado Department of Education (2024).
[11] Colorado Department of Education (2023).

under the performance frameworks multiple times, thereby increasing the weight of their assessment scores.

CDE accountability data from [need year(s)] show a range from weak to high correlations between student demographics and plan-type assignments for school improvement through the performance frameworks. For example, the data reported very weak to no correlations between student subgroups (multilingual learner, poverty, etc.) and growth but a moderate relationship between achievement and some identified student characteristics. Specifically, there was a high correlation between free and reduced-price lunch eligibility and achievement scores. Additionally, some of the results may be impacted by factors such as low participation rates, opt-outs, insufficient data, and requests to reconsider.

| Challenge | **The students with disabilities group is too narrowly defined for data reporting- and framework-scoring purposes, which may mask the positive impact some schools are making on students with disabilities.** |
| --- | --- |
| | *See Recommendation #3 for solution* |

Note to group: Need to understand the scale of this challenge that later offers a recommendation – have you considered how many students are currently seeing improvements in the assessment results and therefore coming off of IEPs? How big of an impact would this have?

Comment from Rhonda: ESSA does not define students with disabilities. States are required to report and disaggregate data for this subgroup to ensure transparency and accountability in educational outcomes. In statute the requirements is to include "children with disabilities". For ESSA identification and reporting purposes, we only includes students with IEPS for the definition of students with disabilities. I am checking with the team if states have the flexibility to also include students on 504 plans within the definition of SWD.

Currently, all public school students with disabilities are protected under the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (Section 504). Some students with disabilities receive additional protections under the Individuals with Disabilities Education Act (IDEA). For students eligible under the IDEA, special education programming is designed to teach the students compensatory skills so that they no longer meet the eligibility criteria under IDEA. When a student is no longer eligible under IDEA, the student continues to have a disability and may be eligible for accommodations, modifications, and services under Section 504 to access academic, non-academic, and extracurricular activities.

- Comment from Rhonda to the above: I don't think this is always true. A student can exit an IEP for speech articulation for instance, after meeting speech goals in alignment to like-peers. Does this student still have a disability? A student could also exit an IEP for a reading disability and might not be eligible for a 504 plan for accommodations, modifications, and services under Section 504.

In Colorado's accountability system, only students eligible under IDEA are currently counted in the subgroup of students with disabilities. This means that when students no longer meet the criteria for IDEA, they exit this subgroup. This can have a negative impact on schools' and districts' performance

ratings because these students' higher achievement or growth are no longer included in the students with disabilities subgroup and can impact the accuracy and interpretation of that subgroup analysis. Effectively, schools and districts are not recognized for their efforts to move students off of IDEA eligibility. Likewise, others note that because these students still have a disability and may be eligible for accommodations despite not being eligible under IDEA, they should still be considered in the students with disabilities subgroup.

- From Ryan and Nicholas: Would it be helpful here to discuss how this works for multilingual learners as an example of how it's done differently for a different subgroup? MLL students are included exited. See an earlier CDE presentation for the specifics, if interested.

| Challenge | **Rural schools and districts face volatility in scoring because of low student numbers and the state's current thresholds for reporting data.** |
| --- | --- |
| | *See Recommendation #4 and Recommendations for Further Study for solutions* |

The rules for calculating performance framework ratings and publicly reporting student results also pose a challenge for rural schools and districts, which are impacted differently by the accountability frameworks due to lower enrollment numbers. The volatility caused by low student numbers, where even a single student can significantly affect overall performance scores, creates a margin of error and an inequitable comparison of district, school, and grade level outcomes. Effectively, in these smaller schools and districts, individual students' assessment scores are weighted more heavily than those of students in large urban districts. [From Jim, Ryan, Mark, and Nicholas: add example of this scenario here – A simple example to illustrate the point would be beneficial. What does an SPF look like for a school with 19 students with growth scores vs. the next year they have 21 growth scores?]

| Challenge | **PLACEHOLDER FOR WEIGHTING GROWTH AND ACHIEVEMENT** |
| --- | --- |
| | *See Recommendation #5 for solution* |

[TEXT]

| Challenge | **The PWR sub-indicators do not fully account for the breadth of quality pathways that exist for students nor provide information on various ways schools and districts are preparing their students for postsecondary education and the workforce.** |
| --- | --- |
| | *See Recommendations 6, 7, 8, 9, and 10 for solutions* |

Colorado has long been recognized as a national leader in prioritizing postsecondary and workforce readiness (PWR) opportunities for students. Over the last decade, Colorado has made significant

investments that have increased opportunities for students to gain PWR skills while in high school. These investments have allowed a greater number of students to earn a quality, in-demand industry credential or postsecondary certificate; accumulate college credit that is attached to a defined PWR pathway; and gain relevant work-based learning or on-the-job training while they are in high school. Every Colorado student should have these opportunities, and schools should prepare students to be both college- and career-ready in a manner that is measurable and allows for recognition of the most effective programs in Colorado.

In 2022, the legislature created the [Secondary, Postsecondary, and Work-Based Learning Integration Task Force](#) (informally known as the "1215 Task Force") to study the impact and reach of Colorado's myriad PWR programs and opportunities for improvement. The 1215 Task Force concluded that the PWR sub-indicators do not fully measure how schools and districts prepare their students for postsecondary education and the workforce under Colorado's current accountability system.

In line with a future-oriented vision to make Colorado the top state in offering students meaningful PWR opportunities, the accountability performance frameworks should be updated to improve the way PWR opportunities are measured, better reflect metrics that are predictors of postsecondary and workforce readiness, recognize and reward schools for the ways they are preparing students for their futures beyond K12 education, and incentivize the growth of these PWR opportunities.

Incorporate 1-2 sentences to tie into this the FAFSA completion and GED attainment (under certain conditions) should these two recommendations be added.

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## Recommendation 1

*Newly Added* **Adjust CDE policies to allow more students to be counted in performance frameworks and allow for more transparent public data reporting.**
Disaggregating results for subgroups of historically underserved students in public reporting is extremely important. However, ensuring these smaller subgroups receive adequate attention and analysis is challenging, especially when they fall below CDE's public reporting thresholds. CDE can enhance transparency in public reporting by lowering the thresholds for all framework elements (e.g., from 16 to 10 for achievement, from 20 to 14 for growth) and by changing aggregation rules to allow aggregation for growth across levels (i.e., elementary, and middle and high) when one level has insufficient growth data. PWR - display graduation rates on SPF/DPF when there is a minimum of 4 students, consistent with prior public reporting. [this needs to be turned into a sentence]

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Impact of n-size:
Adjust CDE policies to allow more students to be counted in performance frameworks and allow for more transparent data reporting. Lower n-size thresholds for public reporting for all framework elements (e.g. from 16 to 10 for achievement, from 20 to 14 for growth). Change aggregation rules

to allow aggregation for growth across levels (ie. elementary, middle and high) when one level has insufficient growth data. PWR - display graduation rates on SPF/DPF when there is a minimum of 4 students, consistent with prior public reporting.
From pre-meeting survey to gather initial input (added on 9/10/24)

| | |
|---|---|
| Pamela Bisceglia AdvocacyDenver | include |
| Rhonda Haniford | There are 3 recommendations in this one. 1. I am open to lowering N-size, and will need to know the data privacy law on this. 2. Is this for schools in the same district being combined? Would this be a K-12 system? 3. Would need to know if privacy law would allow for this? |
| Jen Walmer | I agree on lowering n size thresholds. Need more information on aggregation rules |
| Wendy Biirhanzel | agree to this |
| Mark Sass | approve |
| Ryan Marks | Yes, we must discuss. |
| Don Haddad | This is a significant issue in terms of credibility of ratings and reporting. There needs to be more transparency in reporting ratings. |
| Jim Parr | Include |
| Dan Schaller | Clear explanation/understanding of why current CDE policies in this area can/should be overridden |
| Lisa Yates | I am not sure how these lower numbers were determined and while it addresses having fewer students with insufficient data, it does not address n size issues. |
| Rebecca McClellan | I agree. This would provide critical transparency for all concerned parties. |
| Ted Johnson | I think these recommendations are fine. |
| Brenda Dickhoner | YES this should be included as a recommendation |
| Tammi Hiler | Feels like this is still ripe for a discussion. I think these are important recommendations, so long as the aggregation is supplemental/additive and not replacing disaggregated data in any way. |

## Recommendation 2

**To reduce the impact on student demographics on plan-type assignments, points assigned through the accountability system's framework should reflect a combined subgroup approach with regard to growth and achievement.** This means only the all-student group and combined subgroup would be scored for points on the framework. This will ensure that scores for students included in multiple subgroups will not be counted multiple times toward a school and district's rating in the accountability system, and it will ensure that schools that do not have sufficient data in individual subgroups will still earn (or not) subgroup points.

The combined subgroup would represent a distinct count of students falling into one or more of the individual subgroups, including free/reduced-price lunch eligible, students of color, multilingual learners, and students with an IEP. This means that even if students belonged to more than one of these subgroups, they would only be counted once for scoring framework points. From Rhonda: Would the performance frameworks still report the results, but groups would not receive framework scores? Just a reminder that federal accountability reporting would still be required. Scoring for all students in a school or district would continue as is. CDE must continue to report disaggregated groups for both schools and districts on student achievement and growth results across multiple subgroups, even where students may be assigned to multiple categories because disaggregated data is critical to closing gaps between students.

*For the detailed analysis supporting this recommendation, please refer to the [Additional Insights: State and District Performance Frameworks](#) section within this document.*

## Recommendation 3

**Designation of a student with a disability under the performance frameworks should include the combined count of students identified under IDEA and the first four years of a student exited from an IEP.** Specifically, when a student is no longer eligible as a student with a disability under IDEA, that student will continue to be designated in the disability subgroup for four additional years. This is similar to how multilingual learners are counted. This will help ensure Colorado acknowledges that a student who moves off an IEP still needs support and that schools' and districts' performance frameworks are not negatively impacted because these students' higher achievement is no longer included in the students with disabilities subgroup.

## Recommendation 4

**Utilize the request for reconsideration process for accountability ratings proactively by allowing small schools and districts to address potential issues before preliminary scores are finalized, even if that means delaying the release of performance frameworks for a particular school or district that has entered the request for consideration process.** This could include permitting the small school or district to use the alternative accountability framework that AECs use if the school or district does not have enough data for a rating. Should a district receive a lower level on the Performance Frameworks, it would trigger an accreditation process. Local school boards would retain the authority to accredit schools through such a process.

From Dan: Given the unique circumstances of AECs in terms of the types of students they serve as opposed to the NUMBER of students they serve, I'd be hesitant to start having that framework apply in these broader contexts

From Brenda: Agree. And CDE provided feedback that a small school that does not have enough data for a rating still wouldn't have enough data for an AEC framework, so this might not be feasible and we should consider removing this sentence reference the AEC framework.

From Rhonda: Agree. The AEC framework student N count thresholds remain the same as the non-AEC framework thresholds.

From Ryan: Agree re: AEC. I also think this might be an order of operations question to per another comment of mine.

From Nicholas: agree based on CDE's feedback/concern

| AEC systems and how districts are held accountable for their AEC students. From pre-meeting survey to gather initial input (added on 9/10/24) | |
|---|---|
| Pamela Bisceglia AdvocacyDenver | include |
| Rhonda Haniford | We should discuss this. |
| Jen Walmer | Important conversation - wonder if we have enough info to dive into AEC frameworks and what changes may be necessary |
| Wendy Biirhanzel | Ensuring they are accountable and not a place to hide students |
| Ryan Marks | We should discuss. |
| Don Haddad | Districts should be accountable for these scores |
| Dan Schaller | Exploration of potential unintended consequences of changing the current approach/system |
| Lisa Yates | Priority. Districts removing AEC from final rating seems in contrast with intent of including all students in framework. AEC frameworks have already been adjusted, so they should be included. |
| Rebecca McClellan | If changes are made here, I hope to avoid unintended consequences. For example, we should avoid creating an incentive to push students toward and AEC, and a avoid an incentive that would withhold and AEC opportunity to a student who would otherwise be a good candidate for an AEC. |
| Ted Johnson | I think the most significant factor for AEC's should be their ability to help students earn a diploma. |
| Brenda Dickhoner | I don't think status quo practice should change on this |
| Kathy Durán | I think this warrants more conversation and want to ensure that we as a task force have heard from AEC school leaders or district leaders. I believe AEC's serve such a |

| | |
|---|---|
| | critical role in serving students who otherwise might not complete high school or get the personalized/ specific experiences that they can receive at an AEC. If I missed some of this discussion, I apologize, and would just want to ensure I am signing off on what is best for students while also balancing accountability measures and rigor. |
| Tammi Hiler | Yes, this is a great recommendation, would like to include! |

| **Recommendation 5** |
|---|
| **PLACEHOLDER FOR WEIGHTING OF GROWTH AND ACHIEVEMENT** |

| WEIGHTING OF GROWTH AND ACHIEVEMENT  From pre-meeting survey to gather initial input (added on 9/10/24) | |
|---|---|
| Rhonda Haniford | We should discuss the weights of growth and achievement, and PWR for HS too. |
| Jen Walmer | Think this will need to be a values conversation - what is right balance etc. Think it might be difficult to come to consensus on a particular change of weight without seeing all of the other recommendations from the group adopted and what the outcome of those changes are in framework. |
| Wendy Biirhanzel | Increasing growth to show school/district imp suggestion:Elementary/Middle: 25% Achievement, 75% Growth High School/District: 15% Achievement, 50% Growth, 35% PWR.act and input into outcomes |
| Mark Sass | Need to discuss |
| Ryan Marks | Yes, we must discuss. |
| Don Haddad | Undecided |
| Dan Schaller | Evidence and explanation for why making additional shifts to the weighting here matters; demonstration that additional shifting would result in even further correlation between things like FRL and overall SPF rating |
| Lisa Yates | I believe this means how much should each be attributed in frameworks. If so, I agree further discussion. |
| Rob Anderson | Need a balance that allows all schools to succeed, especially those with high FRL |
| Rebecca McClellan | I would have to know exactly what the proposed change would be. I think we've struck a good balance, and we should consider keeping the weighting we have. |
| Amie Baca-Oehlert | Need more information here |
| Ted Johnson | The way that growth is calculated is tricky and creates a system that in some ways always leaves a group of schools at the bottom. That said, I don't thinking tinkering with the weighting is something that would "fix" that process. |

| | |
|---|---|
| Brenda Dickhoner | Yes we should discuss this |
| Tammi Hiler | I'm open to a discussion, but not sure if we need to give specific weights beyond just saying directionally if we think something should be higher or lower. |

## Recommendation 6

**In line with the 1215 Task Force's recommendation, remove PSAT/SAT Reading/Writing and Math from the PWR Indicator but measure them in the Achievement and Growth Indicators.** The PSAT/SAT Reading/Writing and Math scores are currently represented in the Academic Achievement (PSAT scores only) and Academic Growth (PSAT and SAT scores) performance indicators, in addition to the PWR indicator. Removing these assessments from the PWR indicator but adding the SAT and keeping the PSAT in the academic achievement indicator and the SAT and PSAT in the academic growth indicator allows the PWR indicators to include other measures that better assess postsecondary and workforce readiness.

## Recommendation 7

**In addition to the 1215 Task Force recommendations, add "College and Career Readiness Before Graduation" as a PWR sub-indicator in the accountability frameworks.** A high school diploma is an important, foundational credential for future job and education prospects. However, obtaining college credit or advanced/specialized technical or vocational skills before high school graduation is a goal for every learner in the state. That is why the 1215 Task Force called for the inclusion of concurrent enrollment in the PWR indicator.

However, this Task Force would like to expand upon that recommendation by creating a new sub-indicator, "College and Career Readiness Before Graduation," that would include the completion of concurrent enrollment courses and passing scores on Advanced Placement (AP) and International Baccalaureate (IB). This sub-indicator would also recognize student completion of state-recognized work-based learning experiences, CTE courses, and industry-recognized credentials. In sum, this measure would credit schools and districts for each successful completion of or passing grade in a college and/or career readiness opportunity. That means a student could be counted multiple times in this indicator by recognizing the importance of college and career opportunities. The sub-indicator should also be disaggregated to ensure equitable completion of courses that prepare students for college.

The Task Force also recognizes that not all courses or work-based learning opportunities are currently created equal, and we should emphasize high-quality options that lead to meaningful credits and experiences for students. For example, we do not have full insight into the transferability of all coursework, so to ensure that the state is prioritizing concurrent enrollment and AP and IB courses that will result in transferable college credits for students, the Task Force recommends aligning this indicator with courses currently included in the state's established Guaranteed Transfer Pathways General Education Curriculum. The state could also look into opportunities to expand the GT Pathways to include other measures like the Cambridge Advanced International Certificate of Education (AICE) and the College Level Examination Program (CLEP), which is often used for second language learners. In addition, the state should incorporate opportunities reflected in Colorado's Work-Based Learning Continuum, including clinical experiences, internships, pre-apprenticeships, apprenticeships, and on-the-job training that are vetted through the Office of Future Work's legislative mandate through SB22-140 to develop quality expectations for this continuum. This emphasizes the need to recognize and reward work-based learning opportunities with proven track records of success.

Comment from Tammi: I think some of the biggest feedback we got in the comments in the doc was to make clear that schools/districts would get recognition for the in-school career readiness work they're doing, similar to how we are calling out a college after graduation rate. In our previous version, we were only capturing those kinds of programs (like apprenticeships, etc.) in the newly-named "matriculation rate" indicator, which was flagged as not giving credit to the schools investing in those opportunities while students were in high school (only those who go on to do those programs after they graduate).

## Recommendation 8

**In addition to the 1215 Task Force recommendations, to better reflect the suite of postsecondary options available to students beyond high school, rename "matriculation rate" to "pathways progression" as a PWR sub-indicator and expand it to be more inclusive of the continuum of work-based learning experiences.** The Task Force recommends changing the name of the "matriculation rate" sub-indicator to the "pathways progression" sub-indicator, as the former specifically refers to entry into a college or university and does not accurately capture the myriad options available to students beyond high school and how K-12 education can prepare students for college and career success.

Like the "pathways progression" sub-indicator, the renamed "matriculation rate" should continue to include learner progression data into post-high school enrollment in Career and Technical Education (CTE), associates' degree programs, bachelor's degree programs, and the military. The sub-indicator should also continue to include credential attainment of value while in high school (i.e., dual enrollment with an associate's degree program).

The Task Force also recommends that the renamed "matriculation rate" sub-indicator begin to include learner progression data on additional high-quality post-high school opportunities reflected in Colorado's Work-Based Learning Continuum, industry-recognized credentials, and other postsecondary education and training programs that meet identified quality criteria, such as alignment with those criteria required by the Eligible Training Provider List (ETPL).

Currently, other industry credentials are incorporated into the rates based on voluntary district-submitted data. This Task Force recommends updating reporting capabilities so it is easier for districts to report high-value industry credential attainment and work-based learning experiences and requires reporting under the new "matriculation rate" sub-indicator.

As the state moves forward with developing a State Longitudinal Data System, we recommend that it consider using it in lieu of individual district reporting mechanisms. Finally, where possible, we recommend using data matching with relevant sources to ease the school/district data reporting burden.

## Recommendation 9

**Placeholder Recommendation:** Include a FAFSA completion requirement as an opportunity for bonus points on frameworks.

| PWR: FAFSA completion requirement as part of bonus points for PWR. From pre-meeting survey to gather initial input (added on 9/10/24) | |
|---|---|
| Rhonda Haniford | How would students who are undocumented participate/ be included? Should this be on the dashboard and not bonus points? |
| Jen Walmer | Would like to see current completion range and ensure that we are setting a high enough bar for bonus points |
| Wendy Biirhanzel | this is definitely an equity issue and districts with high poverty and high clde will be punished while affleunt districts may do nothing and gain points |
| Mark Sass | Do not approve |
| Ryan Marks | Not a priority. |
| Don Haddad | No, I do not believe this should be required, n-size and demographics etc. complicates this work. |
| Dan Schaller | I think we need to be careful about the use of bonus points in general and how they could undermine the consistency and comparability of the current system |

| Lisa Yates | Not priority - opposed. |
|---|---|
| Rob Anderson | Would like to discuss the pros/cons of this. Where did this come from? |
| Amie Baca-Oehlert | Not in favor of this. There are some schools (with high undocumented student populations for example) where completion rates would unfairly penalize |
| Ted Johnson | Absolutely not. There are too many issues with the FAFSA process as well as delays. We shouldn't rely on this. |
| Brenda Dickhoner | No - I would not vote for this. I dislike this as much as the eliminating social studies rec. |
| Kathy Durán | Are there any barriers or unintended consequences with making it a requirement for bonus points? |
| Catie Santos de la Rosa | It would be important to share and come to consensus on the target percentage as a benchmark for the bonus point, not just recommend that a bonus point exists. |
| Tammi Hiler | I threw this on the doc because I think there is a need to improve FAFSA completion rates and this was a suggestion that had been tossed out there in some discussions I've had recently. |

## Recommendation 10

**Placeholder Recommendation:** Allow GED to be counted toward graduation if certain criteria are in place

| Name | Added on 9/10 from pre-meeting survey:<br>PWR:<br>Suggestion for a GED to be counted toward graduation if certain criteria are in place. |
|---|---|
| Pamela Bisceglia AdvocacyDenver | include - in addition students with disabilities participating in 18-21 year old programming should be counted as a graduate |
| Rhonda Haniford | I would need to know more. A GED does not long term result in the same potential of income (economic stability for the person). I'm open to a separate line that accounts for GED completers, but not necessarily to be added into the graduation rate. |
| Jen Walmer | Criteria will be important to discuss, but not against the concept |
| Wendy Biirhanzel | yes as this is a major issue when you get aq student new to country with no transcripts and is 16/17 - the gethas higher expectations than work keys |

| | |
|---|---|
| Mark Sass | more discussion |
| Ryan Marks | Yes, we must discuss. |
| Don Haddad | Yes, as long as student meets certain situational criteria. |
| Lisa Yates | If added, needs discussion. |
| Rob Anderson | Worry that it will promote GED and not HS graduation |
| Rebecca McClellan | Provided this does not incentivize GED over traditional diploma, I would agree that getting more students qualified to join the workforce every way we can is a good idea. |
| Amie Baca-Oehlert | Would like to explore this more |
| Ted Johnson | I would support looking at this. |
| Brenda Dickhoner | Not sure - would need to learn more and discuss |
| Kathy Durán | Does this happen retroactively? I would like more information to understand how this data would be counted and if GED and traditional grad rates would be disaggregated or combined into one data point before making a decision. I need more information before I can decide whether this is an effective change to propose. |
| Catie Santos de la Rosa | I think this is an extremely relevant recommendation to the work being done already. It would be important to explicitly articulate said conditions (I.e. the student was at that school setting for a minimum of _ weeks to be included in the data) |
| Tammi Hiler | This is not something the PWR group discussed at all. Not a priority for me. |

| Recommendations for Further Study |
|---|
| CDE should be given the appropriate resources necessary to research areas related to addressing state and district performance frameworks:<br>● **Explore how the state could compare schools with similar characteristics and calculate a median growth percentile, similar to how individual student comparisons are made.** This could provide a fairer reflection of student performance. This "similar schools" measure would not supplant current statewide indicators but could add points to a framework to account for performance as compared to similar schools.<br>  ○ Rhonda and Dan both want more thinking on the "similar schools" thinking above above: Could we consider further describing what "similar schools" means? By region? By disaggregated groups? By size? Would this recommendation be applied to all schools? For instance, would we be comparing schools with low rates of Economically Disadvantaged Students and low rates of English Learners with each other in addition to comparing schools with high rates of these groups?<br>  ○ Regarding the whole bullet point: |

- - ■ Rob "fully support[s] a "beating the odds" measure. Used in other accountability systems which award bonus points for schools outperforming other like schools.
    - ■ From Ryan: I agree with the comments about more information on what "similar" means but I'm also not sure how this solves/addresses the n-size problem. I think I need more background on this recommendation.
    - ■ From Wendy: The only way I see this working is if this request is asking to run the growth model with only students from the identified characteristic districts, instead of from the entire state. This breaks down part of the way the growth model works. The model is already comparing students with similar score history and previous studies have shown that it is not strongly influenced by demographics, and it works best with the largest sets of data, there's certain minimum population sizes required to run it at all. The task force could consider asking about including certain demographics as factors in the growth model (i.e. SPED in addition to score history), but otherwise I don't see how this request makes a ton of sense.
    - ■ From Tammy: Is there an example we could include of what this could look like?
- **Explore best practices for minimizing volatility in small systems.** For example, a study commissioned by CDE could look at how other states address accountability for rural schools within their state systems while controlling for the inherent volatility.
- **Study the possibility of an entirely alternative accountability process specifically tailored for small and rural districts that account for local factors and trend data**, ensuring ratings are assigned with context while minimizing the burden on rural areas. [UNCLEAR OF DECISION TO KEEP THIS IN OR TAKE IT OUT]
- **A study should explore the lessons from local accountability work in Colorado, such as the Student-Centered Accountability Process (S-CAP), as a way to** serve the unique needs of rural schools and districts.
    - ○ From Rhonda: S-CAP and the other sites participating in the Local Accountability Systems grant are using a supplemental reporting approach, not an alternative accountability system. Is the recommendation to build in a dashboard that allows for the addition of local measures for performance framework points for all schools or only the small and rural districts? If it is for all schools/districts that could allow for both the unified comparability and allow for flexibility to include the local context into the "equation."
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## B.  Assessments Used for Accountability Ratings

Assessments drive key elements of a high-quality, relevant education and serve different purposes for different stakeholders. For Colorado's accountability system, assessment is critical.

Changes to assessment have the potential to address some of the larger challenges that the Task Force is considering more broadly related to the state accountability system. Within the accountability system's school performance frameworks, student academic achievement and growth – as measured by CMAS and the PSAT/SAT assessments – account for the most significant portion of a school or district's performance rating. This makes the alignment of state assessments to Colorado's academic standards all the more important for the purpose of state accountability.

To inform assessment-related recommendations connected to the accountability system, the Task Force sought input from stakeholders and experts; examined various assessment structures and designs (e.g., through-year assessment vs. end-of-year summative; state and local); researched how other states approach assessment for accountability; and, considered ways technology can enhance accessibility and performance for all students.

The recommendations below assume the state continues using a standards-based state assessment and maintains a singular state assessment system—in line with the Task Force's view. Proposed adjustments to the state assessment in subsequent recommendations do not require Colorado to pursue Innovative Assessment Demonstration Authority (IADA).

*For a more detailed analysis supporting the following recommendations, please refer to the [Additional Insights: Assessment](#) section within this document.*

| Opportunity | **Schools and districts need ways to decrease time on test administration while still being able to assess students' mastery of standards-aligned skills and knowledge.** *See Recommendations 11 and 12 as well as Recommendations for Further Study for solutions* |
|---|---|

Adaptive assessments present an opportunity to shift the way assessments are administered. In adaptive testing, the questions students encounter as they move through the test depend on how they answered the prior questions. Adaptive testing has the potential to assess knowledge and skills in less time and may offer an opportunity to measure individual student growth related to standards more accurately. For example, the most recent version of the digital PSAT/SAT provides a certain degree of adaptability based on student responses. In essence, an assessment can adjust the sequence of questions based on a student's correct and incorrect responses. This helps to pinpoint more precisely where a student is performing in relation to the standards and reduces test-taking time.

Changes to the CMAS assessment in prior years reduced the total time spent on it and prevented the state from reporting a writing subscale score. Adaptive assessments or other assessment innovations may allow additional information to be reported in a valid and reliable way. However, there may be some federal restrictions regarding the degree of adaptability that is allowed due to requirements that an assessment measure the student's performance related to the student's current grade-level standards.

In addition to adaptive assessments, other technological considerations may present opportunities related to the information gained from the state assessment and the student experience. For example, when the shift to computerized assessment occurred, all students were able to utilize additional accessibility features that were integrated into the testing platform. Similarly, the expanding capacity of artificial intelligence might be leveraged to decrease the amount of time required to score constructed responses, a key component of the current state assessment, and thus provide assessment results to stakeholders more quickly. Additionally, adjustments to the state assessment based on available technology should be pre-scheduled at fixed intervals to ensure that the assessment continues to leverage new approaches and methods of assessment.

| Challenge | Colorado's current assessment and accreditation system does not align with the research for students whose first language is not English.[12] *See Recommendations 13 and 14 for solutions* |
|---|---|

The state needs to expand assessment accessibility for all students, and there may be a particular benefit for multilingual learners. Currently, the CMAS assessment is available only in English and Spanish for multilingual learners. Additional language options may be especially helpful for providing a more accurate reflection of a school's performance when they are implementing a research-based instructional model such as Dual Language Immersion.

However, since the state assessment is designed to assess the impact of the school on student learning, additional languages may not further this objective as the language of instruction and assessment might differ. For example, language acquisition research points to the need for students to have access to 4–5 years of effective instruction before reaching grade-level proficiency.[13] Considering newcomers' age and developmental stage when arriving in Colorado will be critical to determining a student's ability to access both the academic English language and the content of their grade level assessment at a given time.

| Challenge | State assessments do not yet enable all students to demonstrate mastery against the standards, making it difficult for educators and parents to sometimes interpret assessment results – especially for learners who are multilingual and/or identified to receive special education. |
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[12] Colorado Department of Education (2024).

[13] Thomas & Collier, ARAL, 2017, Validating the Power of Bilingual Schooling.

|  | *See Recommendations 15, 16, and 17 for solutions* |
|---|---|

Similarly, there is an opportunity to expand assessment accessibility for students with special needs. Time limits imposed on all students, accommodations such as "text-to-speech" for certain portions of the reading assessment, and the availability of a calculator for the math assessment could all help expand accessibility.

| Challenge | <span style="color:red">**Some school leaders, educators, and parents find state summative data less actionable, given the timeliness of receiving results.**</span><br>*See Recommendation for Further Study for solution* |
|---|---|

<span style="color:red">Given the role state assessment plays in the accountability system, it is critical for results to be reported in a timely and transparent manner.</span>

Regarding the above challenge… from Adam: Just want to ask the task force to consider the extent this depends on the purpose of the state summative in relation to other assessments used throughout the year (i.e., local). What district is fully dependent upon state summative results to inform planning?

| Challenge | **Results from state assessments are a key factor in school and district accountability, yet Colorado law prohibits schools and districts from encouraging participation.**<br>*See Recommendations 18, 19, and 20 for solutions* |
|---|---|

Since results from the state assessment are used in the Colorado accountability system and the extent to which students have participated in those assessments may impact the interpretation of aggregated data, CDE reports two participation rates: the total participation rate and the accountability participation rate. The total participation rate combines all the assessment records for each subject area (English, math, and science) across all grade levels within a given school or district and is included in the performance frameworks to provide context for interpreting how representative the reported results are likely to be of the entire student population. The accountability participation rate excludes opt-outs from the numerator and denominator calculation. These rates are also included in the performance frameworks, and if the district or school has accountability participation rates below 95 percent in two or more content areas, typically, the overall rating is reduced by one level.

*Feedback needed from task force: should the term "parent excusals" or "opt-outs" be used?* While parent excusals account for a large percentage of the total nonparticipants on the state assessment (about 81% of non-participants on the 2022-23 state assessment were parent excusals), there are other reasons why students may not participate or why student results may not be included in the performance framework.

For example, a student who experiences a misadministration of the assessment (i.e., when a test is not administered in accordance with state guidelines) will not count as a participant.

Moreover, while not all schools and districts with low total participation are a result of parent excusals, there are a number of schools and districts (5 districts and 46 schools based on data from 2022-23) with total participation rates at or below 25 percent. This overall low participation rate has resulted in developing an Insufficient State Data (ISD) rating or plan type. This rating/plan type is automatically assigned if the total participation rate is at or below 25 percent for both sections of the state assessment (English language arts/Evidence-based reading and writing and math). Additional criteria can also result in the automatic assignment of an ISD plan type/rating, and schools and districts can request an ISD plan type if they have below 85 percent total participation in state assessments through the Request to Reconsider process.

The Evaluation of Colorado's K12 Education Accountability System audit explored the relationship between assessment participation rates and school and district ratings. The audit found that assessment participation rates "do not have a significant effect on school or district performance ratings. Relationships do not exist or are weak between (a) current-year assessment participation rates and current-year performance ratings, (b) prior-year performance ratings and current-year assessment participation rates, and (c) the number of parent excusals and current year performance ratings."

[Don]I would like further discussion as I do not necessarily agree with this finding. This conclusion can't be accurately determined without understanding demographics such as socioeconomic factors etc. related to who is opting out and or simply not participating.
[Mark] I wonder if the CDE data table on participation rates (above) will break the data down to show socio, etc.

Colorado's Federal accountability plan also must account for parent excusals along with other nonparticipants. While the federal accountability plan is not directly relevant for this Task Force, per the approved ESSA state plan, CDE will re-calculate federal identifications by applying the lowest total score for each student below the 95 percent total participation rate. In other words, FROM RHONDA: Federal accountability does not allow for "opt outs". So, any eligible student that does not test (even though parent opted the student out), receives the lowest score. Those scores are a part of the federal accountability score for the school and district. Those scores are a part of the federal methodology for identifying schools/districts as Comprehensive Support or Targeted Supports.
https://www.cde.state.co.us/accountability/federalaccountability [May need further discussion]

| Challenge 🏃⚙ | **Federal law does not allow for opt outs in federal accountability, so Colorado's scores are negatively impacted by students that do not take the assessment.** <br> *See Recommendation for Further Study for solution* |
|---|---|

Could use clarification: I don't understand the connection being made between Federal law and how that negatively impacts Colorado's scores. Do they mean for federal reporting purposes?

Federal law requires that states obtain at least a 95 percent total participation rate on assessments (SEC 1005 (c)(4)(E)(i, iii)). Colorado imposes a similar requirement for schools and districts; however, since 2015, Colorado has allowed students to opt out of participating in state assessments. HB 15-1323 required school districts to adopt a policy on how parents can excuse their students from a state assessment. These policies must include information detailing how a student's parent may excuse the student from participating in one or more of the state assessments.[14] Additionally, this law prohibits a district or school from imposing negative consequences on students who opt out, and it also prohibits a district or school from imposing an unreasonable burden or requirement on a student that would discourage the student from taking the assessment. Since this policy was implemented, participation rates on the various state assessments have varied by district, school, grade level, and student groups for various reasons. In the 2023–24 school year, more than 44,000 students in grades 3–8 (over 26,000 of which were in middle school) were excused from participating in the state assessment.

What percent of students is that?  And why just 3-8
[Ryan] I'm not sure. I missed that initial conversation. I got data from CDE and 14.3% of middle school students (53,240 records because this is math and ELA so divide by 2 assuming both tests are excused which isn't always the case puts it at about 26,000 students) had a parent excusal in 2023. The statewide rate was 10.1% (about 58,000 students) , high school was 9.9% (about 20,000 students), and elementary school was 6.1% (about 12,000 students).

**Total Participation Rates Since 2015 by Subject and Level**

| Overall | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Numerator | Total Rate |
| Elementary (CMAS/DLM) | 423,974 | 94.7% | 429,372 | 94.8% | 432,558 | 95.3% | 431,607 | 96.4% | 418,597 | 96.5% | 194,123 | 75.3% | 382,595 | 92.9% | 382,228 | 356,430 | 93.3% |
| Middle (CMAS/DLM) | 368,607 | 88.4% | 371,733 | 87.6% | 376,400 | 88.9% | 380,733 | 91.6% | 391,332 | 92.0% | 195,364 | 62.6% | 381,027 | 83.8% | 371,876 | 313,706 | 84.4% |
| High (PSAT/SAT/DLM) | - | - | - | - | 251,522 | 92.3% | 391,029 | 93.1% | 395,123 | 92.7% | 402,219 | 74.7% | 400,050 | 85.7% | 404,181 | 343,216 | 84.9% |
| Overall (CMAS/PSAT/SAT/DLM) | 792,581 | 91.8% | 801,105 | 91.5% | 1,060,480 | 92.3% | 1,203,369 | 93.8% | 1,205,052 | 93.8% | 791,706 | 71.9% | 1,163,672 | 87.4% | 1,158,285 | 1,013,352 | 87.5% |

| English Language Arts | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Numerator | Total Rate |
| Elementary (CMAS/DLM) | 211,449 | 94.7% | 214,731 | 94.7% | 216,290 | 95.2% | 215,805 | 96.3% | 209,317 | 96.4% | 124,880 | 74.9% | 191,317 | 92.9% | 191,135 | 177,937 | 93.1% |
| Middle (CMAS/DLM) | 184,325 | 88.5% | 185,826 | 87.5% | 188,211 | 88.9% | 190,374 | 91.6% | 195,676 | 91.9% | 68,030 | 63.6% | 190,520 | 83.7% | 185,935 | 156,450 | 84.1% |
| High (PSAT/SAT/DLM) | - | - | - | - | 125,763 | 92.3% | 195,519 | 93.1% | 197,562 | 92.7% | 201,109 | 74.7% | 200,025 | 85.7% | 202,091 | 171,610 | 84.9% |
| Overall (CMAS/PSAT/SAT/DLM) | 395,774 | 91.8% | 400,557 | 91.4% | 530,264 | 92.3% | 601,698 | 93.8% | 602,555 | 93.7% | 394,019 | 72.8% | 581,862 | 87.4% | 579,161 | 505,997 | 87.4% |

| Math | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Numerator | Total Rate |
| Elementary (CMAS/DLM) | 212,525 | 94.7% | 214,641 | 94.9% | 216,268 | 95.3% | 215,802 | 96.5% | 209,280 | 96.6% | 69,243 | 76.0% | 191,278 | 93.0% | 191,093 | 178,493 | 93.4% |
| Middle (CMAS/DLM) | 184,282 | 88.4% | 185,907 | 87.7% | 188,189 | 88.9% | 190,359 | 91.7% | 195,656 | 92.1% | 127,334 | 62.1% | 190,507 | 83.8% | 185,941 | 157,256 | 84.6% |
| High (PSAT/SAT/DLM) | - | - | - | - | 125,759 | 92.3% | 195,510 | 93.1% | 197,561 | 92.7% | 201,110 | 74.7% | 200,025 | 85.7% | 202,090 | 171,606 | 84.9% |
| Overall (CMAS/PSAT/SAT/DLM) | 396,807 | 91.8% | 400,548 | 91.6% | 530,216 | 92.3% | 601,671 | 93.9% | 602,497 | 93.9% | 397,687 | 70.9% | 581,810 | 87.5% | 579,124 | 507,355 | 87.6% |

*In 2015, CO-ACT was the high school state assessment. In 2016, SAT results were not included in performance frameworks.

**2021 was a performance framework pause year. Participation in state assessments varied across and within districts and schools due to pandemic impacts.

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[14] Colorado Department of Education.

**Parent Excusal Rates Since 2015 by Subject and Level**

| Overall | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Numerator | Excusal Rate |
| Elementary (CMAS/DLM) | 423,974 | 3.1% | 429,372 | 4.3% | 432,558 | 4.4% | 431,607 | 3.1% | 418,597 | 3.1% | 194,123 | 13.6% | 382,595 | 6.3% | 382,228 | 23,384 | 6.1% |
| Middle (CMAS/DLM) | 368,607 | 7.4% | 371,733 | 11.0% | 376,400 | 10.5% | 380,733 | 7.6% | 391,332 | 7.2% | 195,364 | 20.0% | 381,027 | 14.7% | 371,876 | 53,240 | 14.3% |
| High (PSAT/SAT/DLM) | - | - | - | - | 251,522 | 3.4% | 391,029 | 3.2% | 395,123 | 4.1% | 402,219 | 7.7% | 400,050 | 8.0% | 404,181 | 40,213 | 9.9% |
| Overall (CMAS/PSAT/SAT/DLM) | 792,581 | 5.1% | 801,105 | 7.4% | 1,060,480 | 6.3% | 1,203,369 | 4.6% | 1,205,052 | 4.8% | 791,706 | 12.2% | 1,163,672 | 9.6% | 1,158,285 | 116,837 | 10.1% |

| English Language Arts | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Excusal Rate | Count | Numerator | Excusal Rate |
| Elementary (CMAS/DLM) | 211,449 | 3.1% | 214,731 | 4.4% | 216,290 | 4.4% | 215,805 | 3.1% | 209,317 | 3.1% | 124,880 | 13.9% | 191,317 | 6.3% | 191,135 | 11,739 | 6.1% |
| Middle (CMAS/DLM) | 184,325 | 7.4% | 185,826 | 11.0% | 188,211 | 10.4% | 190,374 | 7.6% | 195,676 | 7.2% | 68,030 | 19.2% | 190,520 | 14.7% | 185,935 | 26,634 | 14.3% |
| High (PSAT/SAT/DLM) | - | - | - | - | 125,763 | 3.4% | 195,519 | 3.2% | 197,562 | 4.1% | 201,109 | 7.7% | 200,025 | 8.0% | 202,091 | 20,103 | 9.9% |
| Overall (CMAS/PSAT/SAT/DLM) | 395,774 | 5.1% | 400,557 | 7.5% | 530,264 | 6.3% | 601,698 | 4.6% | 602,555 | 4.8% | 394,019 | 11.6% | 581,862 | 9.6% | 579,161 | 58,476 | 10.1% |

| Math | 2015* | | 2016* | | 2017 | | 2018 | | 2019 | | 2021** | | 2022 | | 2023 | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Total Rate | Count | Numerator | Total Rate |
| Elementary (CMAS/DLM) | 212,525 | 3.1% | 214,641 | 4.3% | 216,268 | 4.4% | 215,802 | 3.1% | 209,280 | 3.1% | 69,243 | 13.0% | 191,278 | 6.4% | 191,093 | 11,645 | 6.1% |
| Middle (CMAS/DLM) | 184,282 | 7.4% | 185,907 | 11.0% | 188,189 | 10.5% | 190,359 | 7.6% | 195,656 | 7.2% | 127,334 | 20.4% | 190,507 | 14.8% | 185,941 | 26,606 | 14.3% |
| High (PSAT/SAT/DLM) | - | - | - | - | 125,759 | 3.4% | 195,510 | 3.2% | 197,561 | 4.1% | 201,110 | 7.7% | 200,025 | 8.0% | 202,090 | 20,110 | 10.0% |
| Overall (CMAS/PSAT/SAT/DLM) | 396,807 | 5.1% | 400,548 | 7.4% | 530,216 | 6.3% | 601,671 | 4.6% | 602,497 | 4.8% | 397,687 | 12.7% | 581,810 | 9.7% | 579,124 | 58,361 | 10.1% |

*In 2015, CO-ACT was the high school state assessment. In 2016, SAT results were not included in performance frameworks.

**2021 was a performance framework pause year. Participation in state assessments varied across and within districts and schools due to pandemic impacts.

*Data table from CDE showing participation rates forthcoming*

From Brenda and Tammi re: the number of recommendations compared to the rest of the focus areas: Can these be rolled up into 3-4 main recommendations? Eg. one on student accessibility features/language accessibility, one on innovations/potential improvements to assessments, and so forth?

## Recommendation #11

**Make the CMAS assessment adaptive as permissible under the current ESSA requirements (for example, cover only content assessed in the student's current grade level) to decrease testing time similar to the current PSAT/SAT assessment.** In addition, an adaptive CMAS assessment that may span more than one grade level should be considered so that student data results indicate which grade level the student met the grade level expectations. This likely would require a waiver from the US Department of Education if the adaptive CMAS covers grade levels below the original tested grade level, i.e., a fifth-grade student takes an adaptive assessment that covers standards within grades 4 and 5. Also, consider how adaptive assessment technology might enable the state to add back the writing subscore to state assessment reporting.

From Sheila: The "may span more than one grade level" is in conflict with the bolded recommendations "for example, cover only content in the student's current grade level) Are you recommending both?.

## Recommendation #12

**Eliminate the paper-based testing option for the CMAS assessment (like the current PSAT/SAT assessment) to facilitate the use of computer-adaptive testing, reduce the number of misadministrations, and decrease the time required to produce assessment results.** Districts should be provided funding, as needed, to assist districts in eliminating the paper-based testing option. The assessments may now be downloaded, so connectivity concerns have been eliminated. The district

may request a paper-based assessment in extenuating circumstances (e.g., lack of computer access for its students and newcomers). Further, students whose Individual Education Programs (IEPs) or 504 Plans document paper-based testing accommodations for state assessments would continue to receive the paper-based option.

## Recommendation #13

**Create a comparable translation of math, science, and social studies assessments into additional languages besides English.** Include home languages that are most represented in multilingual learner populations in Colorado. Spanish forms are already available for CMAS math, science, and social studies. Students should have access to these assessments (including the PSAT/SAT) in additional languages.

From Pam and echoed by Kathy: Language justice is important - assessments should be available in a range of languages. In addition, we should not assume that the student is in a position to take an assessment in English when attending a public school for only a few short years.

From Kathy: Thank you Pam for naming the importance of asset based language acquisition with justice at center. That is the intent here, study additional languages beyond Spanish and make available more widely in our state for equity. Students, particularly secondary level newcomers as well as students 3rd-12th, need to be able to show content knowledge while simultaneously building their English language skills. This gives us much needed information as educators into whether students have had grade level content experience from their home country, or whether they have had interrupted/ lack of appropriate schooling. It teases out the challenge for educators knowing "is this a language question or a content question, or both?"

## Recommendation #14

**Expand the Colorado Spanish Language Arts (CSLA) assessment beyond grades 3 and 4 and make Spanish PSAT and SAT available.**

From Pam and echoed by Kathy: Language justice is important - assessments should be available in a range of languages. In addition, we should not assume that the student is in a position to take an assessment in English when attending a public school for only a few short years.

From Kathy: Thank you Pam for naming the importance of asset based language acquisition with justice at center. That is the intent here, study additional languages beyond Spanish and make available more widely in our state for equity. Students, particularly secondary level newcomers as well as students 3rd-12th, need to be able to show content knowledge while simultaneously building their English language skills. This gives us much needed information as educators into whether students have had grade level content experience from their home country, or whether they have had interrupted/ lack of appropriate schooling. It teases out the challenge for educators knowing "is this a language question or a content question, or both?"

## Recommendation #15

**Require future assessment update and adoption processes to favorably consider culturally and linguistically responsive assessment content and questions to reduce potential bias and divide the assessments into sections to, more specifically, evaluate the desired skills.** For example, include one assessment section without accommodations to assess reading comprehension and one assessment section with accommodations to assess listening comprehension (as required by a student's IEP or Section 504 Accommodation Plan) within the reading assessment. Similarly, consider making the calculator available for all students throughout the math assessment when not assessing computation skills.

## Recommendation #16

**Require more time flexibility on assessments so all students receive the time they need to demonstrate their learning.** The standard time needed to complete the assessment will not change, but individual students can utilize additional time beyond standard time to demonstrate their learning.

## Recommendation #17

**Allocate sufficient resources to ensure CDE is able to provide the existing administrative considerations and accessibility feature accommodations that are allowable to all learners.**[15] Below are some but not all administrative considerations and accessibility features available to all students.
- ACCESS (WIDA): Screen color preference, line guide or tracking tool, scratch paper, and notepad.
- CMAS: Administrative considerations available to all students include small group testing, time of day within a school day, separate or alternate location, specified area or setting, adaptive and specialized equipment or furniture, frequent breaks (does not stop the clock); accessibility features for all students include audio amplification, color contrast, answer eliminator, frequent breaks (does not stop the clock), general administrator directions read aloud/repeated/clarified, highlight tool, headphones/noise buffers, line reader, Zoom, notepad, pop up glossary, external spell check device, text-to-speech for math and science, auditory/signed presentation (reader/signer), writing tools.

## Recommendation #18

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[15] Colorado Department of Education.

**Allow schools and districts to encourage and incentivize participation in state assessments. Revise the prohibition on encouraging and discouraging opt-outs.** Impose additional rules regarding who and under what circumstances a student can opt-out. Enforce this through the district accreditation contract. [From Mark: See this June 2024 report: Two Pieces of a Puzzle: The 95% Participation Requirement in State Plans and States' Opt-out Policies for ideas. https://nceo.umn.edu/docs/OnlinePubs/NCEOReport443.pdf]

Need to know how to incorporate the above comment from Mark into the report.

Note: If Colorado continues to be one of the few states that allows opt-outs, study ways to reward schools and districts with total participation rates above 95 percent on the state assessments. Consider bonus points on the framework, awards, or other incentives to promote strong student engagement and increased participation in the state assessment.

Jen and Dan: Prefer the business rules recommendation in #3 vs the reward bonus points approach.

Brenda and Nicholas: I like this approach since the business rules only affect districts with distinction, right? (a very small number of districts.) This would apply to any school/district. I do think however that statute (and board policy?) would need to change to allow districts to actively promote the benefits of testing and reward high participation (eg undo the pizza party ban)

## Recommendation #19

**Review and update the process for determining which students count for participation rates and how to report better/share information about who is and isn't participating in the assessment.** Adjust "total participation" by removing, for example, misadministration or second-year NEPs. For example, maintain the Students with Limited or Interrupted Formal Education (SLIFE) language in 2024 Assessment Participation and Accountability. This means that students with limited or interrupted formal education take the state test, and their results count for participation but not toward a school's proficiency or growth rating.

## Recommendation #20

**Require students to enroll in schools or districts for six weeks prior to the assessment window to test. However, it will not count as a part of the performance framework under the current continuous in-school/district reporting requirements.**

| Name | ADDED ON 9/10 FROM PRE-MEETING SURVEY Participation and Opt Out: Students enrolling in schools or districts for 6 weeks prior to the assessment window will test, however it will not count as a part of the performance framework under the current continuous in school/district reporting requirements. |
|---|---|

| Rhonda Haniford | Will it count towards the former CO school. If yes, then I support. |
|---|---|
| Wendy Biirhanzel | yes so we can use growth next year |
| Mark Sass | Yes |
| Ryan Marks | We should discuss. |
| Don Haddad | This time period should be much longer as 6 weeks is not nearly enough time to measure with any credibility the impact of the school on this student. |
| Jim Parr | Include- |
| Lisa Yates | More information |
| Rob Anderson | OK |
| Amie Baca-Oehlert | Would like to discuss further |
| Ted Johnson | I think this would be fine. |
| Brenda Dickhoner | Need to discuss |
| Tammi Hiler | So these students' scores wouldn't count for anybody or the previous school? |

## Recommendations for Further Study

CDE should be given the appropriate resources necessary to research areas related to addressing assessment:

- **Improve the timeliness of state summative data so that the data are actionable by school leaders, educators, and parents.**
- **Continue to reflect on and adapt the state assessment to newer technologies. Specifically, consider how technology, such as artificial intelligence, may/should impact state assessments (including scoring constructed responses).**
- **Only state assessment data should be included in the framework's academic achievement and growth indicators.** Including local assessment data as part of the framework calculation is not recommended. However, the state should explore opportunities to support schools and districts in the public reporting of local assessment data, including district-created dashboards. The state should consider how to support districts that may not have the necessary resources to develop and create their own customized dashboards. While the state may provide some guidance related to data integrity and transparency, the state is not responsible for validating or confirming the local data. For districts that choose to use their local assessment data in the dashboard, the state may provide a grant to support the district's use of local assessments. Schools on the clock may be encouraged/required to include local data points such as local assessments for state board-directed action. For schools in years one

and two on the accountability clock, the state will prioritize the grant to support using local assessment data to drive improvements to exit the clock.

- **Consider modifications to the state's approach to non-federally required assessments, including:**
  - Maintain the Evidence-based reading, writing, and math assessments in grades 9 and 10 (PSAT 8/9 and 10), as these allow student growth to be reported and included within the high school and district frameworks.
  - Consider alternate approaches to meeting the federal requirement to assess grade 11 science, including embedding this assessment into the grade 11 SAT assessments, thus eliminating the grade 11 CMAS science assessment.

From Sheila: Are these examples of what should be "considered"? Or are these recommendations themselves?

## C. Public Reporting and Engagement

When considering the accountability system's public reporting and engagement structures, there are several elements that must be considered. A data-driven, transparent accountability system is a core element of a great education system. Data must be timely and easily understandable to be actionable. Because different stakeholders, including school leaders, educators, parents, community members, and policymakers, all have an interest in school performance data with varied levels of understanding of the data, there should be multiple entry points to accessing the data and multiple ways of passively displaying and actively pushing out the data. There needs to be an intentional promotion of education data and a compelling "why" to engage parents and more lay stakeholders. A transparent accountability system with effective public reporting and engagement has the potential to result in a greater investment of time and energy from families, educators, community leaders, and policymakers in service of improving public schools. It is also a way to celebrate the amazing things happening in Colorado schools.

*Opportunities and Challenges*

While the Colorado public reporting system is broad and varied, the Task Force has identified several bright spots that need to continue or expand and areas that could be improved.

| Challenge | |
|---|---|
| | **Colorado data is difficult for stakeholders to find, access, navigate, and understand.** |

While Colorado reports an array of education data, several areas need improvement. For example,

Colorado's SchoolView remains a difficult-to-navigate dashboard despite recent attempts to update it. Drilling down to pertinent data points, including academic achievement and growth rates, is not intuitive. Trend data is not easily accessible. When on a school district page, there is no clear way to view data for schools within the district.

| Challenge | The multitude of dashboards does not convey a strategic vision for what Colorado sees as key milestones for students' success from pre-K through college and careers. |
|---|---|

The data presented on the dashboard are without explanation or without rationale for inclusion. Indicators such as attendance rates and student-teacher ratios are prominently displayed, while academic achievement and growth are not. Lastly, there are also different versions of comprehensive dashboards on CDE's website and narrowly tailored dashboards run by specific units (e.g., graduation rates), which makes it difficult to understand which dashboard is supposed to be the primary source of information.

[from Rhonda] Should we frame the dashboard rationale a bit more. For instance, do we want to consider a statewide portrait of a graduate, and build the dashboard from our work as a task force from there?

| Opportunity | There are five stakeholder groups that provide regular input and feedback into the accountability system are instrumental in ensuring that CDE is designing systems that work for stakeholders. These groups should remain in place to continue to evolve and improve the system. |
|---|---|

It is critical that CDE continue to engage all stakeholders in feedback around the accountability system. CDE currently engages with School Accountability Committees (SAC), District Accountability Committees (DAC), a Technical Advisory Panel (TAP), and a Statewide Advisory Council on Parent Involvement in Education (SACPIE). These groups regularly provide important feedback on the system. At a minimum, these groups should continue to operate. For more information about membership and more information about the function of these groups, see Appendix XX.

| Challenge | The recent audit indicated that there is a lack of transparency regarding various data points based on inconsistent variables. |
|---|---|

There are several areas that are outlined in this report that contribute to data that is confusing due to inconsistent variables. There is a lack of transparency regarding the comparability of schools/districts based on the lack of reporting different graduation requirements, opt-outs, insufficient data, etc. For example, CDE reports out on graduation data, however, many people may not know that the actual

graduation requirements across the state are varied based upon local decisions.  So while graduation rate is accurately reported, it is not transparent that the bar for graduation is completely different in different districts.  While some of these inconsistencies are recommended in this report to be fixed, where they remain inconsistent, dashboards should make it clear when data is not comparable.

| Challenge | **Early grades (K-2) are not currently represented in the accountability system at all.** |
|---|---|

[Early Grades] The Colorado Accountability System's District and School Performance Frameworks do not currently include K-2 outcome measures. However, during the Task Force's initial brainstorming, early education was identified as an important and contributing factor to high-quality schools. Access to quality early education programs was seen as a potential opportunity to incentivize, and an inequity to address that was not currently captured in the framework portion of Colorado's accountability system.

| Opportunity | **Colorado has identified strong early childhood programs as a significant factor contributing to quality schools.  Continuing to support and expand quality early childhood programming is essential for the success of our students**. |
|---|---|

[Early Grades] Given the challenges discovered with adding measures focused on K-2 to Colorado's accountability system, **the Task Force does not recommend including these measures in the accountability system's performance frameworks as a solution to incentivize academic opportunities and address inequities for students.** The measures the Task Force considered do not align with the priorities for early grades education and, therefore, would not serve to improve the accountability system. Additionally, The state already tracks k-2 literacy data through the READ Act, and funds for support or intervention are provided through that specific initiative.  For more information about what this Task Force considered around K-2 but decided not to include, see Appendix xx.

| Challenge | **[moved from PWR]  Parents and students have limited knowledge about the PWR opportunities that exist and how effective they are, and there is not equitable access across or within schools and districts to the variety of PWR opportunities available in Colorado.** |
|---|---|

The Secondary, Postsecondary, and Work-Based Learning Integration Task Force ("1215 Task Force") rightfully identified that though Colorado offers many PWR programs, too often, these programs are not equitable, as not all students across the state have access to quality options. Many school districts find the funding streams confusing or inaccessible, which carries a high administrative burden. Parents and

students are also often unaware of what program options exist at their school when they can access them, and how they can impact students' ability to graduate from high school with college credit or other work-based experience. Today, only X% of students graduate high school with some form of postsecondary credit, a credential, or work-based learning experience.

This Task Force also recognizes that Colorado needs improved data infrastructures to better measure the long-term impact of PWR programming offered across the state, determine the efficacy of these programs, and identify existing gaps to ensure we are equitably providing high-quality opportunities for college and career to all students.

[from Tami: Would the dashboard count towards performance framework points? Would the dashboard approach allow for the "entirely alternative accountability process tailored for small and rural districts" while also allowing for this approach for all schools?

The Task Force reviewed examples from other states that can be looked to for best practices around data reporting. Key themes that emerged are having a unified state dashboard with a clear vision for student success and corresponding indicators and having an intuitive flow for key data to be displayed with the ability to obtain more detailed data easily. An important element the Task Force also discussed was creating space for local indicators to be displayed for users who want to learn about the local context.

**Example #1:** [California](#) is a good example of a comprehensive, navigable, easy-to-understand dashboard. Moving through different screens to get more details is intuitive. Data are displayed through color-coded dials that are easy to interpret, and there is a border at the bottom of the webpage to provide a quick refresher on the performance dials if needed. The subgroup data page provides an easy way to understand performance differences by race, ethnicity, gender, and other characteristics. The district dashboard provides additional local context, including details on local indicators such as parent engagement, student satisfaction, school safety, and more.

**Example #2:** [Indiana](#) provides a good example of an education dashboard with a clear vision for student success. Their new Graduates Prepared to Succeed (GPS) site greets viewers with an overview of why the data matter, the state goals for students, and where students currently meet those goals. After the introduction, users can easily navigate to school- or district-level data, where color-coded performance dials similar to California's are used to convey key metrics. Clicking on any of the dial boxes leads to a more detailed view containing subgroup data. As with California, both current-year data and trend data are provided. Overall, the site is easy to navigate and conveys a coherent statewide theory of action regarding the key milestones for students from pre-K through college and their careers. Thus, Indiana provides a north star for data display and for conveying the "why." Lastly, FAQs are within easy reach on each part of the website, and the page links to more comprehensive, easy-to-comprehend [documentation of Indiana's indicators](#). To see detailed screenshots of each of these state's dashboards, please see Appendix X:

Given the challenges identified, the Task Force recommends the following actions be taken:

## Recommendation #21

**Focus on creating one statewide dashboard.** Take inventory and conduct a landscape and taxonomy analysis of the different dashboard versions managed by CDE, determine what data points and presentation formats are most useful, what is duplicative, and how the overall dashboard could be more user-friendly and accessible by people with disabilities and who speak multiple languages. This recommendation is congruent with the 1215 Task Force, which also recommended the creation of a public-facing dashboard with education and employment outcomes.[16] There are several characteristics of this dashboard that should be included to make it as comprehensive and user-friendly as possible:

- **Display the key indicators that map to Colorado's vision for student success prominently on the dashboard.** The statewide dashboard should present a clear "story" to tell the why behind the data and better engage stakeholders. The statewide vision drives what indicators are prominently displayed. Indiana's GPS Dashboard is an example of a state dashboard with a clear vision for student success that highlights K-2 readiness, math and reading achievement, and college and career readiness. See also the corresponding case study of Indiana as an example. Similarly, information on PWR pathway outcomes could be included if that is a state priority. The statewide dashboard should be easily searchable and customizable to meet the needs of different stakeholder groups (e.g., families, educators, community members, etc.). Also include federal accountability data and identifications on the statewide dashboard. It should also align with the improvement planning process metrics.

| Name | ADDED ON 9/10 FROM PRE-MEETING SURVEY Reporting: Include federal accountability in dashboard model. |
| --- | --- |
| Rhonda Haniford | Support |
| Jen Walmer | Easy and think it should be included |
| Wendy Biirhanzel | will general public udnertan or be more confused |
| Mark Sass | Yes |
| Ryan Marks | I do not want to see this included. |
| Don Haddad | Not necessary |
| Lisa Yates | need more information |
| Rob Anderson | As long as it's not too confusing |
| Rebecca McClellan | Additional information might be helpful here. |
| Ted Johnson | I think it would be helfpul as sometimes federal accountability |

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[16] 1215 Task Force Report (p.9).

| | |
|---|---|
| | gets lost in the state processes and results. It's especially insightful if you have a school that is otherwise performing well but may have a gap for one of their subgroups. |
| Brenda Dickhoner | I think it should be included somewhere but not necessarily on the front page of the dashboard. Maybe a link. |
| Catie Santos de la Rosa | I would need clarification on this suggestion/recommendation. |
| Tammi Hiler | Not a priority for me. |

- **Include state summative ratings (SPF/DPF ratings) on the dashboard.** While statewide dashboards can convey a wealth of information on school and district performance, summative ratings help parents and stakeholders interpret the data easily.

- **The statewide dashboard should include statewide, school, and district-level information and be easily searchable.** Ensure stakeholders can find the information they are looking for (e.g., schools that have math or dyslexia support and are achieving improved results) and give context for information like volatility in scores due to small numbers of students.

- **In the statewide dashboard, allow school districts to report local indicators** (e.g., California). Schools and districts should be allowed to go beyond SPF/DPF.

- **[EARLY GRADES]Add local K-2 measures as an addendum to state measures.** Including K-2 student data makes it visually accessible to the public as information without needing to be included in a performance framework rating. It also promotes family engagement through information to the family. A grade-level disaggregated dashboard of K-2 data, particularly if it includes local assessments, can support system improvements without adding weight to the current model. A K-2 dashboard should be user-friendly and centrally display the following school-level data: whether ECE, Universal Preschool Colorado (UPC), or Pre-K is available, the Qualistar rating, if available, the percentage of students in the kindergarten classrooms who were students in UPC, TS Gold Data available for the term, percent of students exiting READ Act against a district and state average, five values that represent and are self-selected by each school (e.g., small class size, high mental health supports, multilingual programs, enrichment programs, etc.); and K-2 chronic absenteeism rates disaggregated between Kindergarten and a combined grades 1 and 2 category.

D. **Display indicators of PWR programs to make the options available transparent and to incentivize schools to increase the number of options available to students.**

E. **Collect and publish school and district graduation requirements on the dashboard. (Expansion of a 1215 Task Force recommendation)** This will provide greater transparency into the minimum expectations each district has for its students, as well as which PWR opportunities individual districts are offering their students and how well they are preparing

their students for postsecondary education and the workforce. This recommendation is meant to supplement the 1215 Task Force's recommendation to keep the graduation rate in the PWR indicator, as graduating from high school is a meaningful milestone that sets students up for success in college and careers. The dropout rate should also be maintained in the PWR indicator, as it creates an important incentive for school districts to engage and re-engage students toward completion.

F.  **Include a search option on the dashboard.** Different stakeholders, including parents, students, school and district administrators, teachers, and the community, all engage with the assessment data. They need information in a transparent and accessible way. A "search" option on the dashboard could also help stakeholders find information in an efficient and meaningful way. For example, a parent might be interested in reviewing schools that have literacy programs to support students with characteristics of dyslexia.

G.  **Where data is not comparable, the dashboard should clearly and transparently state that variables are inconsistent and, therefore, data may be misleading.**

H.  **[from Jen] Include federal accountability in the dashboard.**

I.  **Run a public information campaign to launch and educate on the new dashboard.** In doing so, leverage media outlets, realtors, business leaders, faith leaders, and others to promote the data and tell the story of why the data is important and how stakeholders can engage with it. Encourage the use of gifts, grants, donations, and earned media to reduce fiscal burden. Encourage districts and schools to share best practices for engaging stakeholders with the dashboard.

## Recommendation #22

**Create more robust assessment reporting options.** The task force discussed the possibility of making available individual results to students and their families ahead of school and district reports (similar to what currently happens with the College Board assessments) that often require more time to put into an accessible and meaningful format. Preparing reports that are customized to stakeholder groups (parents, families, educators, community), including the development of supporting tools, could help different stakeholders access the accountability information in a user-friendly way. Such reports should be made public in as timely a manner as possible.

## Recommendation #23
### [Moved from PWR]
### (Expansion of a 1215 Task Force recommendation):

**The state should prioritize developing data-sharing agreements and structures between**

> **postsecondary pathways partners, districts, schools, and the state during the creation of the Statewide Longitudinal Data System (SLDS) so that there is more data available for use in the dashboard.** During the 2023–24 legislative session, HB24-1364 was introduced and laid the groundwork for the governance structures and technology needed to create an SLDS in Colorado that will focus initially on education and workforce outcomes. HB24-1364 has been signed into law by Governor Polis. The SLDS will allow the state to better track the breadth of PWR programs available to Colorado's students and help determine which are most effective in preparing students for postsecondary education and workforce opportunities. The 1241 Task Force supports statewide efforts to maintain ongoing funding for the SLDS Governance Board, housed in the Office of Information Technology, to support the development, implementation, and expansion of the SLDS to better inform how our system measures the effectiveness of PWR programs and opportunities across the state.

| Name | ADDED ON 9/10 FROM PRE-MEETING SURVEY PWR/REPORTING: On the development of the state longitudinal data system (SLDS), the the following information should be prioritized as the system is built: feasibility of data sharing/exchange requirements between post secondary pathways partners and schools/districts/the state. |
|---|---|
| Rhonda Haniford | Support |
| Jen Walmer | confuses me - are we saying if it isn't feasible that we shouldn't be working to that goal? |
| Wendy Biirhanzel | agree |
| Mark Sass | Yes |
| Ryan Marks | Important for operationalizing, but not for the accountability measures themselves. |
| Don Haddad | Not necessary |
| Lisa Yates | need more information |
| Rob Anderson | Yes - very important |
| Rebecca McClellan | As long as student PII data privacy protections can be honored, this is a good idea. Data such as a high school's success rates for college bound graduates would be useful for parents. Do graduates of a given district or high school tend to succeed if and when they matriculate into an institution of higher learning? The decision to transfer college credits to a new undergraduate alma mater should remain under the control of the student. We have 16, 17, and 18 year olds taking college coursework. Sometimes they bite off more than they can chew, and the grades may reflect this. These students do not have a fully formed prefrontal cortex, yet these decisions may impact their graduate school admissions prospects very far |

| | |
|---|---|
| | into the future, especially if they don't get to choose which courses to transfer to their undergraduate institution. |
| Ted Johnson | This seems fine to me. |
| Brenda Dickhoner | I think this makes sense. Would like to learn a bit more but sounds good. |
| Tammi Hiler | Yes! |

## D. Continuous Improvement (Improvement Planning, Interventions and Supports, and Awards)

All of Colorado's schools and districts participate in continuous improvement planning to manage their performance efforts. All schools and districts, not just those underperforming, can benefit from improvement planning.  Schools that are exceeding expectations can use this process to help clarify priorities and reach new heights.  A strong improvement planning process should require a cycle of continuous improvement to effectively engage schools in ongoing improvement efforts that lead to improved student outcomes. By participating in this process, schools and districts provide a level of transparency for stakeholders to see the areas of focus.  Participating in this process can also lead to early interventions for students who are struggling and support for schools that are in danger of going on the accountability clock.  Priority should be placed on providing interventions, support, and technical assistance to schools before they are placed on the clock.

Improvement planning is a foundational education practice. As part of the Education Accountability Act of 2009, Colorado requires all districts to conduct an improvement planning process annually to align efforts to "ensure all students exit the K12 education system are ready for post-secondary education, and/or to be successful in the workforce, earning a living wage immediately upon graduation."[17]  As a state, we have not yet reached this goal due in part to varying requirements, opportunities, and resources among schools and districts. Colorado's improvement planning process allows schools and districts to reflect on how their major improvement strategies helped them meet the terms of the accountability requirements associated with their plan type assignment and to plan improvements for the next year.

The improvement planning process consists of several components, summarized in a public-facing Unified Improvement Plan (UIP). As part of the improvement planning process, schools and districts must:

- Analyze their current performance on the state assessment in the spring alongside previous assessment years' data to identify trends in performance;

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[17] Colorado Department of Education.

- analyze the performance of subgroups, which is important for considering the efficacy of strategies being implemented;
- develop a set of major improvement strategies that are aligned with the results of their performance;
- develop accompanying action steps and implementation benchmarks, which are the adult actions that indicate progress toward implementing the strategy; and
- establish long-term and interim goals to monitor the efficacy of the process over time.

Colorado's improvement planning process, as it currently operates, promotes public visibility and transparency; offers schools and districts flexibility in what to prioritize and how to achieve improvements; helps schools and districts remain in compliance with state and federal requirements; and provides detailed plans to help improve schools and districts on the accountability clock.

| Challenge | Educators and leaders have noted that completing the improvement planning template is cumbersome. |
|---|---|

CDE has already embarked on a process to streamline this form and will make available a new UIP template for school districts in the 2024–2025 school year. In addition, CDE has provided flexibility related to uploading other action planning documents in lieu of completing the entire UIP, for example, allowing for the submission of 90-day plans instead.

Though CDE has already updated the template, this Task Force believes additional changes could be made to ensure improvement planning focuses on compliance and actual continuous improvement, which will allow educators to link improvement planning processes to improved student outcomes. In particular, the UIPs could be more user-friendly to allow for greater engagement with the plans, according to feedback from some board members, parents, educators, and education leaders in the private and nonprofit sectors.

CDE should continue to engage in a regular cycle of stakeholder input and revisions to the improvement planning template, including how plans for schools and districts could be differentiated to support improvement efforts more effectively. Additional modifications to the template may be considered based on adopted recommendations from the Task Force. Because CDE is administering an optional, new streamlined UIP template for schools and districts this coming year, the task force is not recommending any specific changes to the template at this time. However, CDE should seek to incorporate regular feedback to improve this template, with an emphasis on making the template more accessible and user-friendly to external audiences, including teachers, parents, and school boards.

[This may be in conflict with recommended changes above.  As well as the statements in the previous paragraph]

[from Brenda:  I think we need a variety of district templates to support the wide variety of district contexts. In very small systems where Supts are principals, the current system that flows from DPFs down makes sense. But in a system like Adams 12/Aurora/Denver/Jeffco/DougCo, etc, the district improvement plan should be looking at trends across schools, how district-level initiatives will be differentiated at certain schools (e.g. what is loose and tight across the district) and be driving more towards the district as a system of schools rather than just one big school. This likely requires statutory changes because the district UIP flows from the DPF, which also treats districts like a big school. This pays less attention to where certain subgroups of students are concentrated and how the district plans to manage the performance of their schools.

| Challenge | **Some educators and leaders see improvement planning as something that happens once a year.  Therefore, it is not a meaningful way to drive practice changes.** |
|---|---|

In order for educators to see this as a continuous improvement process, there has to be a focus on it year-round. It cannot just be about completing the plan once a year. It needs to be the center of driving practices toward improvement. The more invested the community is in the plan, the more likely there will be results.

| Challenge | **Information is not provided in a way that is easily understood and actionable for school and district stakeholders. It is also difficult for stakeholders to monitor progress, resulting in uneven implementation of plans and strategies across school districts.** |
|---|---|

While this Task Force agrees that the current process promotes visibility and transparency, this does not necessarily mean that the information is provided in a way that is easily understood and actionable for school and district stakeholders. It is important for stakeholders to be engaged with this process and to understand school and district strengths and areas for improvement. It's also important for there to be a clear way to monitor the success of plan implementation.

| Challenge | **CDE focuses the improvement process on writing and completing the plans rather than offering robust support tailored for schools and districts most at risk of being on the accountability clock.** |
|---|---|

For example, CDE only offers feedback on UIPs if the school or district is on the accountability clock, but for these entities, feedback is not offered until months after submission. While this Task Force does not advocate for increased state oversight of the improvement planning process, CDE could better streamline its efforts and provide targeted resources and support for those districts and schools most in need of implementing effective improvement strategies, thereby helping the improvement planning process lead to improved student outcomes.

| Challenge | |
|---|---|
| 🏃⚙️ | **Support and interventions are designed to be reactive rather than proactive.** |

Limited supports and interventions are available to schools and districts on "watch." Some grant monies may be available, but the first priority is to provide funding to schools and districts with the most significant needs, as identified from the accountability frameworks.

When schools and districts begin to struggle, they move into a Turnaround and Priority Improvement category and are put "on the clock."  CDE staff provide valuable expertise and technical assistance to this turnaround work. Schools and districts schools and districts on the clock should receive intervention at the earliest possible so they can effectively move off the clock. Supports they receive should be continuous and coherent as well as evidence-based.  It is important to remember that districts play an important role in school improvement efforts, including a responsibility to sustain school improvement efforts after grant funds directed for school improvement efforts to move schools off the clock expire. It is also important to note that schools and districts can learn greatly from others by establishing structures like a community of practice to share exemplars and best practices with one another.

 Below, you will see the current progress of schools on the clock.
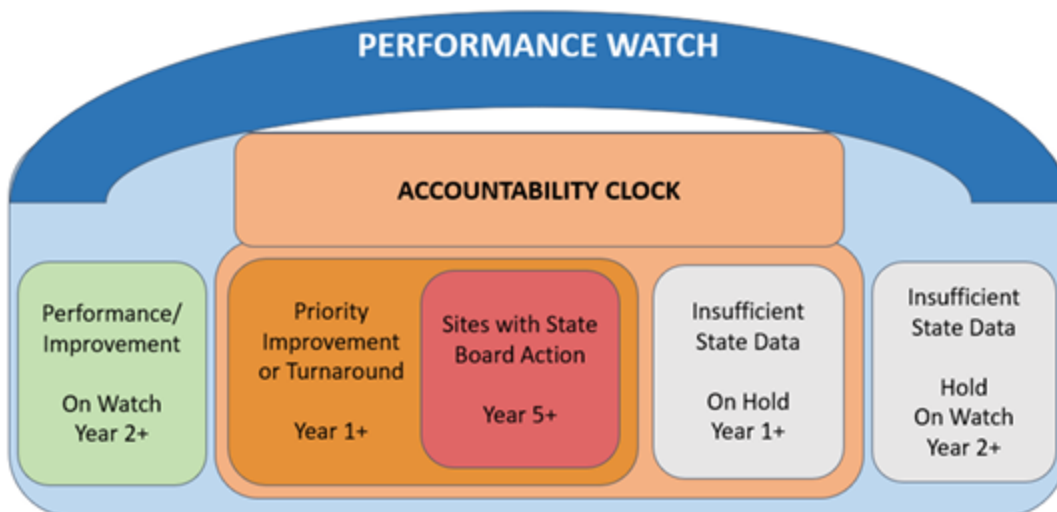
In the fall of 2019, the state began to implement HB 17-1355, which made adjustments to the accountability clock (e.g., two years to exit the accountability clock after at least two years on the clock, and introduced the concept of On Watch) to help stabilize the bounce and ensure sites had access to resources and support.

- From 2010 to 2018, a school earning a Turnaround ("T") or Priority Improvement ("PI") rating for the first time was labeled Year 1, and all subsequent, consecutive PI/T ratings advanced the clock by one year. If the school earned an Improvement or Performance rating, their clock was reset, and a future PI/T rating would restart at Year 1.
- Note that there was a pause in the calculation of plan types in 2015 due to a state assessment transition.
- You can see the number of schools on the clock during each year since 2010 in Table X.

**Table X: Number and Percentage of Schools that Progress on the Accountability Clock (2010–2018)[*]**

| Year on Clock (excludes 2015) | Count of Schools Included | Count of Schools that Advance | Percent that Advance |
|---|---|---|---|
| Year 1 (2010–2018) to Year 2 (2011–2019) | 620 | 255 | 41% |
| Year 2 (2011–2018) to Year 3 (2012–2019) | 237 | 120 | 51% |
| Year 3 (2012–2018) to Year 4 (2013–2019) | 113 | 70 | 62% |

| | | | |
|---|---|---|---|
| **Year 4 (2013–2018) to Year 5 (2014–2019)** | 65 | 41 | 63% |

\* Table description: Row 2 is a sum of all the schools between 2010 and 2019 that moved from year 1 to year 2; Row 3 is all of the schools that moved from year 2 to year 3 in that same time span, and so on. Of the 255 that moved from Year 1 to Year 2, 18 schools exited before advancing to Year 3.

Prior to and subsequent to the COVID-19 pandemic, the accountability frameworks provided the state with the opportunity to identify successful schools and districts for recognition and to serve as a model while also identifying struggling districts and schools so that they may receive additional support and increased monitoring.

CDE offers Four Domains of Rapid Improvement when a district or school is identified for improvement based on the state's accountability frameworks. Supports are distributed through tiers (e.g., universal, targeted, intensive) and are driven by CDE staff and improvement funding channels. District participation in the Department's support is encouraged but voluntary. As such, it is not clear what, if any, authority CDE has to facilitate or demand change. It is also unclear if there are any steps or opportunities where a model school or district could mentor a struggling school or district. Instead, CDE offers all interventions and supports.

| Challenge | Support from CDE is encouraged but voluntary for schools and districts identified for improvement, so it is not clear what authority CDE has to demand change. |
|---|---|

The CDE Theory of Action for school improvement states:

If the Department…

- fosters key conditions and research-based turnaround principles,
- diagnoses and structures focused on improvement planning,
- aligns, differentiates, and leverages the allocation of all funds to ensure equity and maximize impact,
- uses select data and indicators to track and monitor progress,
- actively supports new and growing turnaround talent development programs and
- pursues bold and urgent interventions and actions with schools and districts,

then…

- the lowest-performing districts and schools will become the highest-performing districts and schools as measured by the State Performance Frameworks.

However, if the CDE offers this support and then the schools and districts opt out of it, this theory of action is not likely to be realized. However, some data shows that with CDE support, change can be successful. Table X above shows the number of schools that have successfully moved off the accountability clock with the interventions described.

| Challenge | The support and interventions required by CDE have not been as successful as we need them to be. |
|---|---|

While there has been some success, we continue to have schools and districts that fail to meet the needs of our students. We need to be bold and reimagine solutions for turnaround efforts in schools and districts so that all students experience success. The Task Force recognizes the logic within the Theory of Action and has identified several areas to accelerate bold, urgent support and interventions when schools are on the clock.

| Challenge | The State Board has limited authority to intervene with districts that are struggling. Their directive actions are narrow, and don't require schools or districts in year 5 (or Year 4 early action) to come before them with a school improvement hearing proposal/plan. |
|---|---|

Even when a school or district advances to Year 5 or higher on the clock, the options for the State Board of Education are limited (i.e., Management, Charter Conversion, Innovation, Community School Conversion, Closure, District Reorganization/Consolidation, Removal of Accreditation). The state review process is also limited. For instance, it only allows the state to consider the school and district leadership and capacity but does not give it the authority to demand new leadership. It is appropriate to consider the development and implementation of interventions schools and districts may take before the State Board intervenes.

| Opportunity | During the last two years, the Governor has made investments to bolster proactive interventions. |
|---|---|

The Task Force hopes that this investment will continue. The Task Force also discussed the need for the State to intervene earlier. When early interventions aren't enough, the state needs to be able to make stronger, bolder moves to turn around schools and districts on the accountability clock.

| Challenge | State support and interventions do not occur soon enough in the process. They need to occur before a school or district is put on the clock, and once a school is on the clock, interventions need to be bold and urgent. |
|---|---|

Awards are perhaps one of the least understood and most underutilized aspects of our state's accountability system. Most don't even recognize them as part of it because when we think of "accountability," we tend to focus more on consequences than recognition for success.

However, there is potential for awards to become a far more consequential component of our state's overall accountability system. This includes elevating the prominence of awards to feel more relevant and have them serve as more meaningful tools for learning best practices. Many great things are happening in our schools, and if we can better leverage awards to highlight these successes, they can become a meaningful driver of change across our state.

| Opportunity | There are many success stories in our schools that we should be celebrating. |
|---|---|

Accountability doesn't always have to be about consequences. In fact, people are often far more motivated and driven by recognition than sanction. Awards should occupy a far more prominent place in our accountability system so that schools get the recognition they deserve. This may necessitate streamlining our current awards so that overall, they are much more focused and, therefore, better understood. One of the most important things we can elevate as a state is those "off-the-curve" schools that are getting the best results for students who have historically been least well-served by our public education system. These schools are changing life trajectories, and we should all seek to learn from them and build on their successes. If better leveraged, awards could be a powerful tool for change by capturing, documenting, and disseminating the best practices that contributed to their success.

While our current awards system could benefit from streamlining and clarity of purpose, it should not focus solely on academics and academic results. Awards should be strategically utilized to elevate other "less tangible" aspects and priorities of public education and values of the state, such as success in overcoming chronic absenteeism and setting up career-connected learning opportunities, etc.  It is also important to note that we should ensure that schools or districts that are failing certain demographic groups of students but are able to hide those behind overall achievement should not be recognized with awards.

*Paragraph forthcoming with a brief overview from CDE of current award offerings and what they tend to emphasize*

| Challenge | There's currently no prohibition against awards going to schools and districts with either low test participation or low performance across disaggregated student subgroups. |
|---|---|

Districts with low state assessment participation rates or high variances between results of groups of students (such as student groups historically underserved by the state's system compared to student groups that have been adequately served) can still receive the state's prestigious Distinction rating. These should be necessary preconditions for award consideration.

The Task Force asked CDE for a complete list of currently distinguished districts and how those districts' ratings might change when new business rules exclude districts that don't meet participation criteria and disaggregated student performance. CDE provided the Task Force with a list of districts that earned a 2023 distinction rating but did not meet the new stated criteria. In addition, CDE provided a spreadsheet that delineated how the sites met or did not meet the criteria. (Appendix XX) Additional data points included enrollment ranges for poverty and students with disabilities. The Task Force learned that the current accountability system considers district data over a three-year period, and this may allow a district to attain distinction even if it doesn't meet one of the stated criteria in a given year. The Task Force also considered whether distinction should be an option for school districts where the opportunities are minimal for students in terms of offered courses, technology, concurrent enrollment, CTE courses, co-curricular programs, etc.

From Ryan: What happens if a district/school does not meet these criteria? They receive a Performance rating? Is there we'll want to change about the reporting here? Right now the gauge on the DPF shows the district performance against the cut points and that's pretty easy to read/understand. How might we need to communicate a district that earned sufficient points to be Distinction but didn't meet these criteria? Is there another label needed? Or do we re-label the "new" Distinction group?

| Challenge | The current awards we have are so disparate and disconnected that it can be challenging to properly elevate them and effectively use them to " tell the story" of the positive things happening in our schools and across our state. |
|---|---|

Right now, it seems that awards are not connected to any sort of concrete framework or vision for the state. Just like we have a clear structure for intervening with schools and districts that are struggling, we should have a clear structure for when and how we award success.

| | |
|---|---|
| *Challenge* | **There are not enough resources behind awards necessary to give them the prominence and attention they deserve or to help curate and disseminate best practices.** |

Awards are underutilized as a tool to learn from, incentivize, and replicate best practices. Many people don't even realize that awards are part of the accountability system. It is important that we send the message that the accountability system is not just about intervening when things are not going well but also about celebrating when things do.

Given the stated concerns, the Task Force recommends the following actions.

| **Recommendation #24** |
|---|
| **CDE should provide guidance to local boards on when and how to review and monitor the improvement planning process.** This will help to enhance implementation consistency and fidelity while avoiding increased oversight and compliance requirements from CDE. It will also involve the district and stakeholders (including SAC/ DAC) more in its own improvement planning efforts and allow for UIPs to be reviewed in more public settings. |

| **Recommendation #25** |
|---|
| **The State Board should delegate authority to CDE to approve changes to plans that do not rise to the level of a formal board hearing.** It is important that these plans evolve and are adjusted as conditions in the school or district change.  Flexibility will ensure that these plans are living and breathing documents that drive continuous improvement in the schools and districts. CDE should be required to provide regular updates to  the state and local boards about changes that have been approved in order to provide transparency |

| **Recommendation #26** |
|---|
| **Develop and implement an Early Indicators of Distress Evaluation for all Prior to Clock schools that appear to be trending towards Year 1 identification and Year 1 schools likely to progress to Year 2.** CDE may recommend a Diagnostic Review for these Year 1 Schools by a third party and/or with CDE. Consider if a district, depending on its size, has 1, 2, or 3 schools on the clock and if that district should do a diagnostic review by a third party. A district may, on its own, decide to conduct a self-assessment with an external reviewer(s) that have been vetted by CDE and have evidence of success. |

| **Recommendation #27** |
|---|

**Beginning in Year 2 on the clock, the CDE will engage with schools and districts through iterative support and ongoing feedback, beginning with developing a comprehensive school improvement plan.** The Plan will be reviewed and approved by CDE staff. In partnership with the District, CDE may make recommended modifications to the School Improvement Plan. Ultimately, CDE will approve or continue to recommend modifications to the Plan. The CDE recommendations will align with the Four Domains of Rapid School Improvement that address the resources, training, high-quality curriculum and materials, potential external partnerships, and potential partnerships with neighboring schools and districts. The CDE recommendations are requirements to be implemented by the District. CDE needs to consider the district as a change agent and as the lever of change to improve the schools' outcomes. The district and the school plan must be coherent with each other.

## Recommendation #28

**Increase funds for schools and districts pursuing bold solutions to turnaround.** There are many examples of schools and districts around the country, and right here in Colorado, that have turned around their low performance. CDE must design budgetary expectations for school turnaround and implement a funding sustainability plan. They should drive resources to the schools most in need by ensuring the district plan details the allocation of resources in this way.  Some examples of plans that could be considered for additional funds include:

- Management Restructuring—including, but not limited to, changing leadership roles, bringing in new talent**,** state school and district turnaround pools available for districts, state-vetted partnerships, and enhancing governance practices.
- Creating a talent pipeline–Other states pay the salary of vetted turnaround leaders so schools can use their PPR on other activities.  Colorado should intentionally explore what role the state can play around 1) leadership development (develop a turnaround leader pipeline) and (2) attracting talent, particularly in schools/districts on the clock (bonus/stipends for teachers working in schools on the clock.)
- Asset Restructuring—divesting underperforming programs and merging with other educational institutions.
- Collaborative Problem-Solving—involving community members in identifying problems and co-creating solutions; collaborating with community partners to share resources.
- Designing budgetary expectations for school turnaround and implementing a funding sustainability plan.
- Driving resources to the schools most in need.
- Ensuring the district plan details the allocation of resources to address the need.

## Recommendation #29

**Require CDE to analyze the Year 1+ School and District UIP strategies and data to determine what state-wide professional learning and resources should be available for Districts to consider as they implement their UIPs.**

## Recommendation #30

**Allow School Transformation Grant funding to be used to support not only the school's turnaround efforts but also the district's efforts and vice versa.**

From Brenda:  ^^This is also incongruous and I think relates to having a different district-level planning process, which I've made comments throughout about this topic! (see eg comment below on rec #5)

## Recommendation #31

**Require schools and districts to come before the board in Year 5 (or Year 4 early action) with a CDE approved plan.** The Plan must have both short-term objectives and measurable benchmarks, as well as yearly benchmarks for evaluation. The Plan must have clear budget allocations to support the turnaround needs of the district's identified schools and include a financial sustainability plan. Consider the plan development and implementation of interventions schools and districts may take before the State Board intervenes.

## Recommendation #32

**The CDE should be required to conduct an evaluation of external managers and the return on investment to districts and schools, as well as how the CDE manages the external management process**  (e.g., Vet the partners and act as the contracting entity, as well as increase the ability/authority of the state agency to regularly check in with external partners on the progress of the end-of-clock pathway). The evaluation may include but is not limited to, determining where external management has been effective and what components of evaluation were in place for effective management to have occurred. Based on this evaluation, districts may consider external management as a pathway if they, too, have the essential components for effective management to be in place. Consider providing state pre-qualified providers and a state-operated contract agreement to support districts in accessing providers. Districts should provide matching funds for the state dollars received.

| **Recommendation #33** |
|---|
| From Brenda: This recommendation would be around how there could be flexibility for schools and districts to go beyond SPF/DPF metrics as desired. And would allow for district improvement planning processes to be distinct from school improvement planning processes, acknowledging the inherent differences there. |

| Name | ADDED ON 9/11 FROM PRE-MEETING SURVEY<br>Improvement Planning:<br>As the state considers displaying data differently through a statewide dashboard and corresponding local dashboards, the state should revisit the improvement planning process to align with those metrics. This would still include a strong focus on the SPF/DPF academic indicators but could incorporate additional data, if for example K-2 measures are included on the dashboard. Or this could allow districts to intentionally plan for expanding PWR opportunities if there is a statewide goal around college and career readiness. In other words, right now the UIP flows directly from the SPF/DPF. This recommendation would be around how there could be flexibility for schools and districts to go beyond SPF/DPF metrics as desired. And would allow for district improvement planning processes to be distinct from school improvement planning processes, acknowledging the inherent differences there. |
|---|---|
| Pamela Bisceglia AdvocacyDenver | include |
| Rhonda Haniford | I need more information. The Supports and Intervention recommendations have a strong alignment between district to schools for improvement, and I think this recommendation might align them in different directions. |
| Jen Walmer | UIP process already allows an ability to incorporate local priorities etc. |
| Wendy Biirhanzel | good idea |
| Mark Sass | approve |
| Ryan Marks | Low priority |
| Don Haddad | Agreed |
| Jim Parr | Include |
| Dan Schaller | Only concern would be about spending limited time, energy and |

| | |
|---|---|
| | resources on data/metrics that don't ultimately tie back to/influence SPF |
| Lisa Yates | Agree, but not sure matches our given charge |
| Rebecca McClellan | If additional measures are added, it's important to keep the clear and transparent reporting of literacy and math growth and achievement data in isolation, so parents and others do not lose the ability to see these important data points. |
| Ted Johnson | One of the things that we keep hearing about is the importance of a school/district's context in the accountability process. I think that any opportunity to provide more context (including through additional data) is good for schools/districts. |
| Brenda Dickhoner | Yes - but I put this in as a comment -- this is my stream of consciousness thought not an actual concise recommendation |
| Tammi Hiler | Yes, I like this idea. |

## Recommendation #34

[from Brenda] A recommendation could potentially be to differentiate the district template and ask CDE to host multiple sample templates for districts to choose from. This could be a high leverage change overall, and for our districts on the clock or with lots of schools on the clock it could be a way to get at district systems like operations, finance, etc. and how those resources are targeted to the highest need schools and students. There could be a provision that requires a review/approval of district plans when districts are late on the clock, have a certain number of schools on the clock, or want to opt-into feedback but otherwise there is not a full review of all plans beyond a quick compliance check, so that
CDE can focus their resources on the high needs cases and on school improvement strategies (essentially shifting resources from plan review to plan development).

## Recommendation #35

**CDE should require schools to check-in every 3-6 months to monitor and ensure ongoing improvement.** This could be done with a state-wide convening or smaller communities of practice. Schools should present their plan and the progress made toward their plan. This holds schools accountable for reporting their progress and allows schools to learn from one another. This could be guided by the tenets of the Four Domains of Rapid School Improvement, and schools should be taught to consider how the 90-day short cycle planning, not just the 1-year plan, can be leveraged to move the needle.

Additionally, these check-ins should be required to be attended by a team that must include the principal, superintendent, and/or principal supervisor district leader, with others required depending on the contents of the plan. Expand the purpose of the State Review Panel (SRP). These reviews should focus on being diagnostic in addition to evaluative. The SRP should include meaningful data in its report so that the SBE may best evaluate the Plan and/or identify the best directive action.

[From Brenda] SRP should evaluate holistic district systems including budget, governance, operations, facilities, enrollment patterns. It should be more than just a focus on academics. A good model to look at could be how CSI runs its charter renewal process -- it incorporates all of those elements. For schools and districts at the end of the clock, the SRP should be assessing if the right district conditions are in place to foster success and if not, diagnosing what the district can focus on to improve. This should all get reported back to the State Board as well so that the results of the SRP district system evaluation can drive the  supports/interventions

| Name | ADDED ON 9/10 FROM PRE-MEETING SURVEY<br>Supports and Interventions:<br>SRP should evaluate holistic district systems including budget, governance, operations, facilities, enrollment patterns. It should be more than just a focus on academics. A good model to look at could be how CSI runs its charter renewal process -- it incorporates all of those elements. For schools and districts at the end of the clock, the SRP should be assessing if the right district conditions are in place to foster success and if not, diagnosing what the district can focus on to improve. This should all get reported back to the State Board as well so that the results of the SRP district system evaluation can drive the supports/interventions |
|---|---|
| Pamela Bisceglia Advocacy Denver | ok with the statement except I would delete statement that suggests that CSI facilitates a good model-I do not believe we have enough information to confirm or deny whether they have a good model.CSI is a |
| Rhonda Haniford | Support but need clarity as to if the SRP should be doing this or another entitiy. |
| Jen Walmer | Worth discussing, but do any of the supports or interventions available address issues like governance (local elections) and enrollment patterns? |

| | |
|---|---|
| Wendy Biirhanzel | yes we need this support for districts |
| Mark Sass | approve |
| Ryan Marks | We should discuss |
| Don Haddad | This is already accounted for in annual audits related to this area. These areas are very important; however, not directly indicative of student academic achievement. |
| Jim Parr | Include |
| Lisa Yates | This is in line with how accreditation works in many states. I believe this needs more discussion. |
| Rebecca McClellan | Academic growth and achievement should remain the focus for State Review Panel site visits and reports. The State Board typically DOES get a lot of other information from schools and districts. The SRP reports are a vital firsthand witness report that should remain focused on academic progress. |
| Amie Baca-Oehlert | Include teacher retention rates |
| Ted Johnson | While I think those things are important and could be included as information, I think it's beyond the scope of the taskforce which is really focused on each organizations ability to provide a quality education and outcomes for students. |
| Brenda Dickhoner | Ditto to above!! :) |
| Kathy Durán | I agree with the approach and reviewing a model like CSI. Charters have high accountability on multiple levels that districts can learn from. |

## Recommendation #36

**Offer additional benefits for districts and schools that receive awards to make awards more attractive and compelling.** This could include financial incentives, statewide recognition, priority points on grants, priority participation in task forces, etc.

| Name | ADDED ON 9/10 FROM PRE-MEETING SURVEY<br>Awards:<br>Awards come with a financial bonus when feasible |
|---|---|
| Rhonda Haniford | Growth awards, yes. |
| Wendy Biirhanzel | always when possible if award focus on the right thing and all schools/district can actually access |
| Mark Sass | No |
| Ryan Marks | Low priority |
| Don Haddad | Disagree as this process is already inequitable and flawed and does not warrant additional misplaced $. |
| Jim Parr | No a priority for me |
| Dan Schaller | Where or on which awards these (likely) limited resources should be focused |
| Lisa Yates | Would want to understand the why and what will not be funded to achieve this as well as reporting requirements associated with the award. |
| Rob Anderson | Where did this come from? This was in place in Florida and can become tricky - happy to discuss |
| Rebecca McClellan | Neutral on this item. |
| Amie Baca-Oehlert | Not a priority and will further the poverty disparities. I am opposed to this |
| Ted Johnson | Some awards do come with a financial bonus already. Although we've started to see some movement around the funding process for schools, it's still very unstable at this point. I think it would be difficult to consistently award schools, especially if we start to experience funding shortfalls. The Budget Stabilization factor is a perfect example. Consider what would happen if one school or district is receiving an award while at the same time the BS factor is cutting millions from another district. |
| Brenda Dickhoner | Yes |
| Catie Santos de la Rosa | I would not include this in the recommendation. |
| Tammi Hiler | Not sure if this is necessary to include. |

## Recommendation #37

**Target existing awards to ensure maximum impact and focus on state priorities and values.** The awards should have a clear focus on schools and districts that are achieving the best results for historically underserved students and families. The Governor's Bright Spot award or CDE's Connect for Success program could serve as strong models for this recommendation

## Recommendation #38

**Create new awards with clear success criteria that include categories beyond academic growth and achievement.** For example, schools that are successfully addressing chronic absenteeism.

## Recommendation #39

**Increase the amount of resources available to CDE or others to meaningfully research, document, disseminate, and reward the best practices occurring in award-winning schools and districts, particularly those outperforming other demographically similar peers.** The department has a history of providing exemplars and best practices. Some examples of how CDE could use additional funds and resources include:

- Expand the Connect for Success program so that more schools and districts may partner with peers to improve student outcomes. Based on the High Achieving Schools study, Connect for Success is a service that supports participants in visiting High-Achieving Schools.
- Expand the Transformation Network so that more schools and districts may benefit from proven strong research-based practices in effective turnaround strategies.
- Develop a mandatory statewide, ongoing convening of schools/districts on the clock to share their plans and progress. Use a learning cohort model or community of practice approach so that peer schools/districts learn from and with each other.
- Consider how to further share effective practices across the state, including, but not limited to, researching and evaluating the effective practices and strategies used by schools and districts that came off the clock and remained off the clock so that these systems are elevated and used as examples for other districts.

## Recommendation #40

**Implement business rules for awards eligibility that address when a district [question: and school??] should be eligible to receive a distinguished designation.**

Currently, districts with low participation levels in state assessments can still receive a Distinction rating. Similarly, districts with overall high growth and achievement scores but low scores for certain subgroups can also receive a Distinction rating. While this underlying disaggregated data is visible and present to the public, the effects of these scores essentially mask subgroup results behind a school or district's overall performance.

To make the awarding of a Distinction rating more centered on improving results for all students, the group considered a new set of common business rules that must be met to receive the distinguished rating. These include:

- Earn Sufficient points on the DPF to earn a Distinction rating.
- Total participation rates on assessments must be at least 85 percent
- The "all students" group receives a rating of at least "meets" for academic growth
- The "all students" group receives a rating of at least "approaching" for academic achievement
- No individual subgroups receive a "does not meet" rating for academic growth  (per Rhonda: What if they take the super subgroup recommendation–how does this one change?)

For a summary of what the recommended progression of support would look like, see Table X.

**Table X: Proposed Progression of Supports and Interventions**

| Year on Accountability Clock | Early Indicators of Distress Evaluation | Diagnostic Review Self-Assessment | School Improvement Plan Submitted to CDE to determine Recommendations<br><br>Plan defines the resources, training, curriculum, materials, external partners, etc. | Community Meeting to Discuss Plan and Progress<br><br>CDE monitoring of Plan | If CDE recommendations are followed, funding with District match awarded<br><br>If not followed, no funding award (grant/ innovation funds, PPOR) | State Review Process (SRP) | State Board Directed Action |
|---|---|---|---|---|---|---|---|
| **Prior to Clock** | X | | | | | | |
| **Year 1** | | X | | | | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Year 2** | | | X | X | X | | |
| **Year 3** | | | X | X | X | | |
| **Year 4** | | | X | X | X | X | X (Early Action) |
| **Year 5** | | | X | X | X | X | X |



We will discuss accreditation at our meeting.

### J.   Accreditation

*Opportunities and Challenges*

The Education Accountability Act of 2009 (S.B. 09-163) and H.B. 18-1355 authorize CDE to conduct an annual review of the performance of public schools and districts in the state. Based upon that evaluation, the Department then makes recommendations to the State Board of Education concerning the type of school improvement plan to be implemented in each school and the accreditation category and improvement plan for each district. The process for determining each district's initial accreditation rating and each school's initial plan type and the process for submitting district and school plans are outlined in the Colorado District Accountability Handbook.

To generalize, Colorado statute gives authority to the State Board of Education to **accredit** *districts* and assign a **plan type** to each *school*, while giving local Boards of Education authority to **accredit** *schools*, based on the school plan types provided. CDE provides the following diagram to illustrate the process.

State Accredits Districts

CDE annually reviews performance through school and district performance frameworks

August/September

Districts Sign Accreditation Contracts

Districts officially sign off on final district accreditation ratings and sign Accreditation Contracts

By December 31st

Districts Accredit their Schools

Districts verify school plan types and district ratings using the Accreditation Form

September/October

While statute CRS 22-11-30 (1) (2) assigns local Boards with the authority to **accredit** *schools*, the process must be in alignment with the accreditation contract and process established by the state board to **accredit** *districts*. The law states school categories for accreditation must be comparable to districts and must adopt and implement plan types (performance, improvement, priority, or turnaround) that meet or exceed the state expectations. To this end, CDE rules establish the accreditation process to provide districts with accreditation plan types for each school and the local Board must use these designations to accredit their schools or participate in the request to reconsider process with evidence to support a different accreditation type.

The request to reconsider for a school must still be approved/accepted by the State Board of Education. The request to reconsider process has eligibility requirements with limited conditions for application.

These include:

1. Body of Evidence
2. Accountability Participation Impact
3. Calculation Error
4. Impact of Alternative Education Campuses on the District Performance Framework
5. Districts with a Single School
6. Districts with a Closed School
7. Change to Insufficient State Data
8. Grade Reconfiguration

*Interpretation of Colorado statute 22-11-30 (1) and (2) and CDE resulting rules presents a question if local Boards actually have authority for school level accreditation.*

*From Rhonda:  Local boards accredit their schools, and they must take the state assigned plan types into consideration. Districts have the ability to have alternate criteria that meets or exceeds what the state uses for plan type generation. CSI and DPS are good examples of this. Technically a local board could not accredit a school for failure to meet additional local requirements.*

A second aspect of the accreditation contracts between the State Board of Education and Colorado school districts includes meeting the following provisions:

- Budget and financial policies and procedures (assurance, no data required)
- Accounting and financial reporting (assurance, no data required)
- School safety and Gun Free Schools Act (assurance, no data required)
- Periodic review and adoption of curriculum standards that meet or exceed state standards (assurance, but data from state assessment is further used as evidence)

Item #4 of the provisions is what is accounted for in determining a rating on the performance frameworks. Provisions 1–3 are accounted for through a district's self determined assurance.

Determining accreditation with nearly exclusive emphasis on student outcomes is highly unusual in national and global accreditation processes. Accreditation is most often associated with measures beyond student outcomes to include conditions, or quality indicators, that contribute to outcomes. Examples of accreditation quality indicators often include climate, leadership, and practices or procedures. The typical accreditation process that evaluates the conditions of the system results in districts and schools having details about the conditions of the system that can support effective system improvements and outcomes. These resources from Cognia and the Accrediting Commission for Schools Western Association of Schools and Colleges provide widely accepted accreditation procedures. In fact, some states and many local districts contract with these organizations to "accredit" their schools and districts.

Colorado currently bases accreditation ratings on student outcomes plus assurances in finances, safety and CO academic standards and assessment participation with the performance framework serving as the only measure. Colorado accreditation agreement provisions (#1–3 above) are the only conditions assigned to accreditation and it is unclear other than providing assurance, how these provisions determine accreditation. Information from CDE indicated that historically, accreditation has not been withheld from a district due to not providing these compliance assurances, though letters of warning and support to complete the assurances are provided (for finance and safety, for example). Although rare, there are examples of decreased plan types that occur as a result.

***This task force would contend Colorado provides <u>student outcome</u> ratings through the performance frameworks and very minimal support for accreditation through the assurance of provisions proces**s*.

A third and related aspect of accreditation is the identified challenges associated with the performance frameworks including assessments, "n" size, trends across groups, and post secondary measures, that

have a direct impact on the assignment of accreditation by the State Board of Education. An example of the challenge of the interplay of the framework challenges and resulting accreditation plan types is any district with insufficient data can enter an alternate request to reconsider process and determine its own plan type. There is no further evidence required, allowing a local Board to assign an accreditation label (including "distinction").

From Rhonda:  This is not necessarily for any district. It is only for those that do not have a N-count large enough that even with 3 years of data they still cannot meet the minimum public reporting thresholds.

This occurs only for very, very tiny districts that would never have a high enough n-count after 3 years of aggregations to meet the growth reporting requirements (for example, less than 20 students in 4th and 5th grade over 2017, 2018 and 2019). Assessment participation and opting out are not a part of this scenario.

Should accreditation of districts and schools in Colorado remain fully dependent on student outcomes as calculated in the performance frameworks, then a discussion of accreditation should focus solely on improvement to the performance framework calculations and resulting assigned labels. The recommendations to the performance frameworks must be considered and changes made prior to considering how and to what degree the performance frameworks should be used in accrediting districts and schools in Colorado.

Furthermore, because Colorado accreditation is hyper dependent on the performance frameworks, an aspect of accreditation in Colorado that presents a challenge is the attachment of a "plan type" to the accreditation level. Districts in Colorado can receive an accreditation rating of: *Distinction, Accredited, Accredited with Improvement, Accredited with Priority Improvement, Accredited with TurnAround, Unaccredited, Insufficient data.*

Schools are provided plan types and local boards accredit schools in line with the plan type ratings: *Performance, Improvement, Priority Improvement, Turnaround, Insufficient Data.*

These accreditation ratings draw attention to plan types rather than the district's status as "accredited." It is challenging to communicate in communities when the plan type of "Improvement" requires no further improvement actions, but has a negative denotation.

From Rhonda:  An "Improvement" plan type does not meet state expectations, and there are some additional requirements (e.g., some additional planning requirements, annual signing of accreditation contract) but it is true that these requirements are not as intensive as the schools on the accountability clock (PI, T).

*Recommendation(s)*

**Recommendation #1: Develop an accreditation process separate from or not exclusively determined by Performance Frameworks. Likely remove, not support through this task force. Let's discuss in September.** Many states accredit schools separate from providing stakeholders with transparent and accountable data on student performance outcomes. This would require legislative change. By

accrediting schools based on quality indicators of highly effective systems, districts and schools have data for leveraging the system to improve conditions that lead to improved and sustainable outcomes. Student outcome and performance levels would be made available publicly through dashboards. By accrediting schools beyond student outcomes through the performance frameworks, schools and districts with insufficient data would still have information to the public regarding accreditation status through evaluation of quality indicators.

From Jenn: Maybe replace this one with building out the consideration of the assurance of provisions section documented above.


**Recommendation #3**: **If accreditation remains dependent on Performance Framework plan types, rename the plan types for better stakeholder understanding.**

*Suggestion 1:*
- Public Rating:
  - Accredited with Distinction
  - Accredited
  - Not Accredited
- CDE provide supporting dashboards of performance data that can be searched as supporting evidence of the rating

**[moved from reporting] Revise summative rating labels to improve understandability.** Colorado's ratings are not intuitively understandable and could be updated to help leaders, educators, parents and other stakeholders comprehend the overall data. See the accreditation section for more discussion.


*Suggestion 2:*
- Accredited Level 5 (highest)—Outside accreditation process to identify system conditions not required
- Accredited Level 4—Outside accreditation process to identify system conditions not required
- Accredited Level 3—Outside accreditation process to identify system conditions optional
- Accredited Level 2—Outside accreditation process to identify system conditions required
- Accredited Level 1—Outside accreditation process to identify system conditions required
- Not Accredited

*Suggestion 3:*
- A
- B
- C
- D
- F

*Suggestion 4:*
- Accredited—Distinction

- Accredited—Commendable
- Accredited—Adequate
- Accredited—Unsatisfactory
- Accredited—Turnaround

*See overlap with Public Reporting and Engagement recommendation #5.*

**Recommendation #5: Expand Accreditation assurances and factor these into the Performance Framework Rating.** Include the school quality Indicators the Accountability task force outlined. Many accreditation processes include a self-evaluation process that is then verified or adjusted by a third party evaluator. Local Boards of Education would use both the Performance Framework (student outcomes) and the evaluation of school quality indicators to determine an accreditation status or level, for example, PWR measures. Measures would be an example of information better suited in an accreditation process. Many of the current and proposed measures would be classified as quality conditions or "inputs" rather than outcomes.

**Recommendation #6: Eliminate the condition of an Alternative Education Campus (AEC) school rating being removed from district performance.** All students, regardless of the school they attend, should be included in Accountability Performance Outcomes. Many districts are unable to establish a separate school for at-risk students due to size, space, staffing and other challenges. These districts do not have the option to remove at risk students from their calculated rating. Colorado goes to great lengths to provide performance data on subgroups of students. To remove a subset of students through the request to reconsider process is not aligned with this value and what the task force views as the purpose of accountability in Colorado.

## Conclusion

*Once recommendations are finalized, insert short paragraph on implications of this work and recommended next steps for the legislature and/or other relevant entities.*

## I. Appendices

## Additional Insights

**Additional Insights: District and School Performance Frameworks**

*Click here to return to the District and School Performance Frameworks findings and recommendations section*

***Combined Subgroup Approach***

To explore the impact of a combined subgroup approach, the task force selected 12 districts for modeling the combined subgroup designation in achievement and growth. All districts chosen for modeling met the threshold for total participation in assessments, and represent different concentrations of poverty, district size, location, and current framework assignments.

| Less than 40% poverty concentration<br><br>From Rhonda: Should this be called Economically Disadvantaged Students (federal term) or Free/Reduced-Price Lunch Eligible (performance framework term)? | 40–49% poverty concentration | 50–59% poverty concentration | Greater than 60% poverty concentration |
|---|---|---|---|
| West Grand: small, priority improvement | McClave RE2: small, distinction | Lake: small, priority improvement | Center: small, priority improvement |
| Garfield: medium, improvement | Moffat RE7: medium, priority improvement | Harrison: medium, accredited | Alamosa: medium, accredited |
| St. Vrain: large, accredited | Mesa: large, improvement | D11: large, improvement | Denver: large, improvement |

Source: [ask study group to update]

From Rhonda – for the districts named above, should we identify the districts? If yes, do they know they are identified in our report. Trying to avoid surprises.

CDE provided information so the task force could compare framework assignments when students' scores are included in multiple subgroup categories and when students' scores are included only once in a combined subgroup.

The task force reviewed this data to determine if the adjustment to a combined subgroup in achievement and growth scoring achieved the following prioritized results:

- Decreases correlation of plan type assignments to student demographics by only counting academic achievement and growth of students in a separate subgroup once;
- addresses perceived "penalty" for serving historically underserved students that is caused by repeated counting of assessment scores for students who fall in multiple subgroups;
- ensures that important disaggregated data is reported accurately;
- increases the number of schools that meet the minimum n-count required to be held accountable for disaggregated student groups, providing more information for small systems;
- ensures that a consistent measurement is used to recognize the performance of individual students who are classified in one or more disaggregated groups;
- ensures that this change does not exacerbate the ability of a large, less-diverse district to mask the performance of disaggregated groups.

The data did confirm that there is a modest impact [From Rhonda: should we define the impact?] on the rating system when the combined subgroup approach is used. It is important to know that the results and ratings may also be influenced by other factors such as opt-outs, low participation, insufficient data, and requests for reconsideration. From Rhonda: Could we discuss how this is a part of the modest impact, when earlier it says, "All districts chosen for modeling met the threshold for total participation in assessments,..."?] In the absence of these factors, the impact may be more significant than modest.

***Measures and Supports to Advance Postsecondary and Workforce Readiness Before High School***
Postsecondary and workforce readiness begins well before high school. Schools and districts can provide - and are already providing - meaningful opportunities for students in the elementary and middle school years. For example, the state's Work-Based Learning Continuum identifies key ways schools and districts can provide career awareness and exploration opportunities to build knowledge of available career pathways to inform career decisions. This includes opportunities like career counseling, career fairs, industry speakers, worksite tours, and project-based learning. The task force spoke with a number of school districts that are already incorporating this work into younger grades to increase this important exposure to all Colorado students.

However, the task force believes that these efforts to expose and support career interest development at the lower grade levels should not be subject to a formal assessment and/or included on school and district reporting measures at this time. Instead, the state should continue to support and develop career-exploration and entrepreneurship learning opportunities for students at both the elementary and middle school levels through ongoing resource development with state agency collaboration and potential future financial contributions from the state. For example, CDE could work in partnership with other relevant state agencies like the Colorado Department of Labor and Employment (CDLE), the Colorado Department of Higher Education (CDHE), and the Colorado Office of Economic Development and International Trade (OEDIT) to create a menu of best practices or a resource guide for schools and districts to best adopt these practices in their own local context.

| Name | Added on 9/10 from pre-meeting survey:<br>PWR:<br>CDE should create a menu of best practices for other elementary and middle schools to adopt on ways to engage students in the PWR process earlier. |
|------|------|
| Pamela Bisceglia AdvocacyDenver | include |
| Rhonda Haniford | Support |
| Jen Walmer | Do they have this capacity? |
| Wendy Biirhanzel | cde and who? I want to make sure we have active people in the field providing input into this |
| Mark Sass | Approve |
| Ryan Marks | Not a priority |
| Don Haddad | Agreed |
| Anne Keke | na |
| Dan Schaller | Not necessarily a particular priority to me at this time |
| Lisa Yates | Opposed. |
| Rob Anderson | OK |
| Rebecca McClellan | I might say this should be presented as a menu of good examples, or suggested sample ideas. I'd leave the door open to even better ideas to emerge over time. |
| Amie Baca-Oehlert | A nice to have |
| Ted Johnson | I think it would be fine for them to create a menu. I think this falls outside of the purview of the work of the task force. |
| Brenda Dickhoner | Sure - this seems like a non controversial/easy addition |
| Kathy Durán | I agree with this, and earlier and often will help support the process of engaging students over time as their thinking develops. |
| Tammi Hiler | Yes! |

It's also important to note recent legislation, HB24-1364, has charged the state with conducting a fiscal study to see where consolidation and cost savings to the state for PWR programs may be possible, including opportunities for additional investments to ensure money is flowing to high-quality options that set students up for long-term postsecondary and workforce success.

## Additional Insights: Assessments Used for Accountability Ratings

*Click here to return to the Assessment findings and recommendations section*

To better understand some of the challenges and opportunities related to state assessments, the task force spent considerable time consulting with various stakeholders and experts. Broadly, the task force considered the amount of time spent on state and federal assessments, the quality of information obtained, the amount of time required to report results, the types of assessments included, and the way in which assessment information is shared with various stakeholders.

The task force discussed various assessment structures and designs and the associated costs and benefits. One new assessment design that the group discussed was "through year" assessments. At a high-level, through-year assessment models administer multiple tests throughout the school year as part of an assessment system designed to provide a single summative score meeting federal and state accountability requirements. The multiple tests are shorter in duration and designed around a set of standards for that time of year. Results are provided within a short amount of time for educators to use to drive instruction, as needed. There are many conceptual and technical challenges associated with through-year assessments, however, including the relationship to curriculum and instruction, which is under local control.

The Innovative Assessment Demonstration Authority (IADA) pilot accountability system presented another option to consider. The IADA is a federally sponsored accountability system pilot in states that have previously established and operated an innovative assessment system. Under the IADA, Louisiana, which has a common curriculum in 70 percent of its parishes, developed an assessment system that focuses not only on skills and strategies that students have developed but also on students' knowledge base. Notably, Maine has utilized the NWEA MAP assessment as its state assessment, which is also the local assessment tool utilized by many school districts throughout Colorado. Overall, it was noted that many of the changes being implemented via pilot opportunities throughout the country have been rolling out slowly, in part due to the COVID-19 pandemic. As a result, there is limited information about the impact of this work. Additionally, as a pilot program, participation in the IADA requires that the state have two accountability systems in place (one for systems participating in the pilot and one for those that are not). Relatedly, changes to assessment structure and design may require additional approval from the US Department of Education including updates to the Colorado state ESSA plan and waivers.

The use of local assessment data could also present a significant change to the way assessment data is used under Colorado's current accountability system. The task force recognizes the value of multiple assessments (i.e., state and local assessments) and the different information gained through both parts of the system. There is an opportunity to include local measures within the "weight" of the framework, or simply include them in the report or possibly as a separate dashboard to provide additional context. The inclusion of local assessment data in the calculation of frameworks raises a number of unanswered questions for this task force, including:
- How can the accountability system create consistency when different measures are utilized from one district to another?
- Do specific criteria need to be established for schools to include local data?
- What would be the process for collecting and reporting local data and who would be responsible for managing that task?

- How would the state address inequities related to the cost of purchasing assessment resources where a district might lack funding for a more robust assessment tool?
- Would the inclusion of local assessment data create unintended consequences for schools and educators such as increased pressure to demonstrate results versus using the data to make decisions about instructional practices?
- If providing local assessment data were optional, would schools choose to include it if the data was not favorable?

## Additional Insights: Early Grade Indicators

The quality of early grades instruction and the support of whole child development is imperative. Early education outcomes should include developmental indicators beyond literacy and math, such as cognitive and language development, social-emotional skills and well-being, etc. Early education should include quality programming, such as family and community partnerships, explicit social-emotional instruction, qualified staff, and ongoing professional development, etc. Including early education indicators in performance frameworks can be a source of improvement for low growth/high performance schools[18]. Improvements in early learning can have significant impacts on long-term student growth and achievement, often at a lower cost than intensive interventions in later years[19] [20] [21] [22]. The use of early grades assessments are most effective when used diagnostically and with a body of evidence to target foundational skills development.  Family engagement in early years is essential[23] [24] .

The Colorado Accountability System's District and School Performance Frameworks do not currently include K-2 outcome measures. However, during the task force's initial brainstorming, early education was identified as an important and contributing factor to high-quality schools. Access to quality early education programs was seen as a potential opportunity to incentivize and an inequity to address that was not currently captured in the framework portion of Colorado's accountability system. Through conversations with stakeholders, the task force found schools with low growth and relatively acceptable achievement would most benefit from improvement strategies focused on early education strategies. Support to these schools identified through a state accountability system could be equipped with improvement strategies identified in high-quality early education programs.

Given the importance of early education on students' long-term success, the task force considered what could be sufficient measures for early grades to include in the state's accountability system. The task force first defined "early grades" to be grades K-2 only and to not include preschool/early childhood

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[18] Conversation with Elliot Regenstein.
[19] Foundation for Child Development.
[20] National Institute of Health.
[21] The Education Trust.
[22] National Bureau of Education Research.
[23] U.S. Department of Health and Human Services.
[24] NAEYC.

education (ECE). While quality preschool experiences, formal and informal, are foundational for the long-term academic success of students, a state accountability system including preschool measures would be difficult at this time. The most challenging factor is that the authority for educational accountability resides with CDE and a separate department, Colorado Department of Early Childhood (CDEC), supports pre-kindergarten opportunities. An accountability system crossing the two departments would be difficult to manage given the different reporting systems and responsibilities. The development and progression of the Statewide Longitudinal Data Systems (SLDS) will resolve this challenge going forward. In addition, we recognize that preschool and kindergarten are not compulsory, which limits public schools' responsibility over student performance. There are also a significant number of preschool providers outside of public schools that could not be accounted for in these measures.

The task force then considered measures that could be included in the performance frameworks that align with the task force's values on early grades education. The task force identified measures currently used by school districts to monitor early grades student growth and development; reviewed accountability frameworks from other states for inclusion of K-2 measures; studied inclusion of K-2 measures in Colorado's local accountability grant systems; and consulted with early childhood and accountability experts. In addition, the task force considered stakeholder input, which emphasized a need from families for information about school performance focused on the early grades.

In particular, the task force considered data already required and reported outside of the accountability system in early grades, such as kindergarten readiness observational data (primarily *Teaching Strategies (TS) Gold)* and READ assessments (Dibels, iReady). Outside of *TS Gold* kindergarten readiness, the state does not currently require a math assessment. However, the use of current literacy and math measures for K-2 was not in clear alignment with the task force's values on early grades education. In particular, these early grades measures are a single source of information rather than a body of evidence, and they are intended to be used diagnostically rather than as summative benchmarks. These tools used in conjunction with local teacher classroom formative assessments are valuable to inform instruction, but used in isolation as group performance indicators are outside their intended use.

The task force also considered developmental factors beyond literacy and math as potential indicators, like social/emotional, physical, cognitive, and language development, all available from *TS Gold*. While these measures align with the task force's stated value to include other developmental measures, the instrument is designed to be informative for a developmental focus for caregivers and teachers, rather than declarative. Furthermore, the tool is primarily aimed for use in preschool and kindergarten, rather than the targeted grades of K-2.

Lastly, the task force studied K-2 chronic absenteeism as a possible indicator that could be aligned with the group's stated values. In particular, because early grades foundational skills are essential to future performance and the early investment can reduce the cost of intervention later, the task force recognized the importance of attendance for young learners. Engagement with family is also of high value to early grades, and this is reflected in attendance as well. Kindergarten is not compulsory and therefore the interventions for this grade are more limited than those available for grades 1 and 2.

Because of this, it would be most useful to disaggregate chronic absenteeism data between Kindergarten and a combined grades 1 and 2 category.

## A. Task Force Charge

Per H.B. 23-1241, the Colorado Accountability, Accreditation, Student Performance and Resource Inequity Task Force was created "to study academic opportunities, inequities, promising practices in schools, and improvements to the accountability and accreditation system."

To complete this study, the task force, at a minimum, **shall consider:**

(I) "Academic opportunities or inequities that may impact academic achievement gaps;
(II) improvements to the accountability and accreditation system to expand and incentivize academic opportunities and address inequities;
(III) promising practices in schools and school districts; and
(IV) recommendations for legislation or rules, as necessary."

To support the considerations of the task force, the task force **may review:**

(I) "The results of the statewide education accountability systems audit report described in section 2-3-127;
(II) the local accountability systems described in part 7 of Article 11 of title 22;
(III) the results of the local accountability system grant program created in section 22-11-703;
(IV) the annual report and evaluation from the high school innovative learning pilot program created in article 35.6 of title 22;
(V) the results of the school transformation grant program created in section 22-13-103;
(VI) the interim and final reports from the secondary, postsecondary, and work-based learning integration task force Created in part 2 of article 35.3 of title 22;
(VII) promising practices from other states as identified by task force members; and
(VIII) leading indicators or instructional practices that could be added to the accountability measures."

In addition, the task force "shall consult with parent organizations, student organizations, and additional stakeholders as needed to address questions necessary to finalize its findings and recommendations."

Lastly, the task force is required to submit to the Legislature by March 1, 2024, an interim report with initial findings and recommendations, and by November 15, 2024, a final report, with findings and recommendations.

## B. Task Force Membership

*Task force members, please review your name and affiliated organization and make edits as needed. Please note that for consistency we are only listing TF members' organizations, not their positions within*

*that organization. Once you've made your edits, or if you have no edits, please initial in the far right column so we know we have the right information in this section.*

The following table lists the members of the task force, what education stakeholder groups they represent, and who appointed them, according to the statute.

| NAME | REPRESENTING | APPOINTING AUTHORITY | *The information in this table is correct* |
|---|---|---|---|
| **Dr. Wendy Birhanzel (Chair)**, Harrison School District 2 | Superintendent | House Speaker | |
| **Hon. Rebecca McClellan (Vice Chair),** Colorado State Board of Education CD6 | State Board of Education | Senate President | |
| **Tomi Amos,** KIPP Colorado Public Schools | Charter Network Leader | Governor | |
| **Dr. Rob Anderson,** Boulder Valley School District | Superintendent (Urban) | Senate President | Correct - RA |
| **Amie Baca-Oehlert,** Colorado Education Association | Statewide Teachers Organization | House Speaker | Correct |
| **Pamela Bisceglia,** ADVOCACYDENVER | Statewide Organization Specializing in Equity and Inclusion | House Speaker | ADVOCACYDENVER no space |
| **Dr. Brenda Dickhoner,** Ready Colorado | Charter School Institute (Governing Board Member) | Senate Minority Leader | |
| **Kathy Durán,** Expert in Multicultural Education | Expert in English Language Acquisition and Bilingual Ed | Governor | |
| **Lindsey Gish,** DSST Public Schools | Teacher (Middle School) | House Minority Leader | |
| **Alison Griffin,** Whiteboard Advisors | Workforce Development and Education Organization | Governor | |

| | | | |
|---|---|---|---|
| **Don Haddad, Ed.D.,** St. Vrain Valley Schools | Superintendent | House Speaker | |
| **Dr. Rhonda Haniford,** Colorado Department of Education | Colorado Department of Education | CDE Commissioner | Correct, but please see my comment about consistency. |
| **Tammi Hiler,** Office of Governor Jared Polis | Governor's Office Representative | Governor | Correct |
| **Ted Johnson,** Pueblo School District 60 | District Administrator (Rural Accountability) | Senate Minority Leader | |
| **Erin Kane,** Douglas County School District | Superintendent | House Minority Leader | |
| **Dr. Anne Keke,** Aurora Public Schools | Local School Board Member | Senate President | |
| **Ryan Marks,** Colorado Charter School Institute | District Administrator (Accountability) | House Minority Leader | |
| **Nicholas Hernandez,** Transform Education Now | Statewide Parents/Families Organization | House Speaker | |
| **Tony May** | Local School Board Member (Rural) | House Minority Leader | |
| **Dr. Robert Mitchell,** Campo School District | Teacher (Rural) | Senate Minority Leader | |
| **James Parr,** Montezuma Cortez/ Southwest Colorado | District Administrator (Rural Accountability) | Governor | |
| **Catie Santos de la Rosa,** Denver Public Schools | Teacher (Elementary) | Senate President | |
| **Mark Sass,** Teach Plus Colorado | Statewide Teachers Organization | Governor | |
| **Dan Schaller,** Colorado League of Charter Schools | Charter School Organization | Governor | |

| Jen Walmer | Statewide Education Policy Organization | Senate President | |
|---|---|---|---|
| **Lisa Yates,** Buena Vista School District | Superintendent (Rural Participant in Local Accountability System Grant) | Senate Minority Leader | |

## C. Task Force Meeting Cadence and Structure

From August 2023 to November 2024, the full task force met 15 times and in small groups <mark>25 times</mark> to conduct its work in accordance with the legislative charge. All but three meetings were held in person. All meetings offered task force members the option to join remotely for those who could not attend in person. All meetings were open to the public, recorded, and posted to the Colorado Department of Education website.

The first phase of the work ran from August 2023 to January 2024. In February, 2024, the task force began its second phase of work, studying in detail elements of the accountability system, and developing recommendations, as necessary, to address the challenges and opportunities associated with each of these elements. A description of the focus and core activities of these two phases of work is described in the table below.

| Phase | Focus of Work | Core Activities |
|---|---|---|
| Phase 1: August 2023–January 2024 | Task force members engaged in learning to better understand the accountability system and what their recommendations might address. | The task force heard presentations from: <br> • CDE <br> • Researchers from CU-Boulder who evaluated the Transformation Network <br> • Representatives from the 1215 Secondary, Postsecondary and Work-Based Learning Integration Task Force <br> • Researchers from CU-Boulder and Center for Assessment who conducted research on other states' approaches to accountability |
| Phase 2: February 2024–November 2024 | The task force considered the challenges, opportunities, and observations associated with each element of the accountability system, and | • Task force members divided into study groups to consider in greater depth elements of the accountability system and begin developing recommendations <br> • Task force members also engaged in |

| | developed recommendations, as necessary, to address these challenges and opportunities | stakeholder consultations to gather additional feedback on recommendations; these included panels at task force meetings, a public comment survey, and additional interviews conducted by study groups |
|---|---|---|

The task force completed its work in November, 2024 when it delivered this final report to Colorado's education committees of the house of representatives and senate, the governor, the state board, the commissioner of education, and the department of education.

Education First, a national education and policy strategy firm, served as the task force's facilitators. Per the legislation, CDE contracted with a facilitator to play a neutral role and guide the work of the task force. The facilitator role included managing task force deliberations in a way that encouraged task force member participation and helped the group come to agreement on recommendations; working with the chair and vice chair to set meeting agendas and objectives; and planning the overall arc and purpose of the task force's meetings. The facilitators also prepared public-facing summaries after every task force meeting, and drafted the interim and final reports.

### D. Interim Report

Per the legislation, the task force submitted by March 1, 2024, an interim report with initial findings and recommendations to the education committees of the house of representatives and senate, the governor, the state board, the commissioner of education, and the department of education. The facilitators drafted the report, and task force members were given the opportunity to add their feedback and suggested revisions. The facilitators incorporated this feedback in the final version of the report.

### E. Meeting Agendas

All meeting agendas, summaries, and public-facing materials are available on CDE's 1241 task force website. The lists below include the dates of each task force meeting, meeting objectives, and agenda topics.

**August 24, 2023**

*Objectives*

- Understand the goals of H.B. 23-1241 and the task force's charge and responsibilities
- Begin to build working relationships with fellow task force members, the task force Chair and Vice Chair, and CDE staff

- Articulate what success looks like for the task force and reflect on individual roles in contributing to that success

*Agenda Topics*

- Welcome, Lunch, and Task Force Member Introductions
- Words from the task force Chair, Vice Chair and CDE
- Aligning on Purpose: Building a Mutual Understanding of H.B. 23-1241
- Envisioning the Future: An Initial Conversation on Quality Schools

**September 26, 2023**

*Objectives*

- Finalize group norms, common definitions and common understanding of what is a "quality school," to guide the task force's deliberations moving forward
- Establish full group understanding of history, purpose, and goals of Colorado's K12 Accountability System
- Discuss recent legislative-commissioned evaluation of accountability system and elevate relevant implications for the task force's work and goals

*Agenda Topics*

- Welcome and Adopt Task Force Norms
- Review and Consider: Accountability and Accreditation Terms and Definitions
- Working Agreement: What is a Quality School?
- Overview of Colorado's K12 Accountability System
- Debrief the Evaluation of Colorado's K12 Education Accountability System

**October 17, 2023**

*Objectives*

- Review group norms to guide the task force's deliberations moving forward
- Build connections among each other in relation to the task force's work
- Realign on the legislative charge of the task force
- Review and discuss a draft roadmap of upcoming meeting topics aligned to the legislative charge that includes the completion of the interim and final reports
- Discuss the task force's follow up questions to CDE on the current accountability system

*Agenda Topics*

- Review Norms
- Discussion & Activity
- Lunch and Small Group Activity
- Realign on Legislative Charge

- Review Roadmap
- CDE Accountability Follow-Up Presentation

**November 3, 2023**

*Objectives*

- Review norms and objectives
- Review progress to date and open questions
- Discuss and adopt a decision making process
- Refine and adopt the roadmap of upcoming topics aligned to the legislative charge that includes the completion of the interim and final reports
- Discuss and identify the academic opportunities or inequities that may impact academic achievement gaps
- Develop a stakeholder engagement process

*Agenda Topics*

- Review Norms and Objectives
- Review Progress to Date and Open Questions
- Review a Decision Making Process for Today's Work
- Refine and Adopt a Roadmap for Upcoming Topics
- Discussion: What are the Academic Opportunities or Inequities that May Impact Academic Achievement Gaps?
- Develop Parameters for a Stakeholder Consultation Process

**December 1, 2023**

*Objectives*

- Create a shared vision for the interim and final reports
- Review the academic opportunities and inequities discussed at the November meeting, and determine which are at consensus for further discussion
- Review progress to date and open questions
- Examine promising practices in schools and school districts
- Advance plans for consulting with stakeholders and experts

*Agenda Topics*

- Revisit Academic Opportunities and Inequities
- Promising Practices (in Colorado and Across States): Part 1
- Promising Practices (in Colorado and Across States): Part 2
- Parking Lot Follow-up: CDE Data Exploration
- Looking Ahead: Future Meetings, Planning for Stakeholder Consultations, and Vision for Reporting

**January 9, 2024**

*Objectives*

- Revisit the latest version on resource inequities
- Examine the state's system for accountability and accreditation: What are the opportunities for improvements to the accountability and accreditation system to expand and incentivize academic opportunities? To address inequities?

*Agenda Topics*

- Welcome and Overview
- CDE Presentation: Data Review
- Revisiting Resource Inequities
- Review Colorado's Accountability and Accreditation System
- Panel Discussion: 1215 task force's Findings and Recommendations
- The CO Accountability System: What is Working and What Could Be Improved? (Part I)
- The CO Accountability System: What is Working and What Could Be Improved? (Part II)

**January 17, 2024**

*Objectives*

- Review other states' accountability and accreditation systems to inform additional research and task force findings on Colorado's needs
- Begin to summarize findings on Colorado's accountability and accreditation system: Colorado's current accountability and accreditation system does X well in comparison to others and could do Y differently in comparison to other states
- Review a draft interim report: What suggestions to the report do task force members have after reviewing the draft?

*Agenda Topics*

- Welcome and Overview
- Continuation of January 9 Discussion on Accountability System
- Presentation: State Scan of Accountability Systems by CU-Boulder
- Small Group Discussion: Reflections on State Scan
- Small Group Work Time: Element by Element
- Whole Group Discussion: Colorado's Accountability and Accreditation System Needs
- Review Draft Interim Report

**February 21, 2024**

*Objectives*

- Review updates to the 1241 task force Road Map
- Review and offer final feedback on the Interim Report
- Form study groups to prepare findings, prepare stakeholder consultations, and consider recommendations to five focus areas within the frameworks

*Agenda Topics*
- Welcome and Overview
- Discuss Proposed Road Map Revisions
- Study Groups Work Time
- Cross-Study Group Collaboration Time, Groups 1–3
- Cross-Study Group Collaboration Time, Groups 4–5
- Review and Finalize Interim Report

**March 12, 2024**

*Objectives*
- Study the frameworks to draft findings and recommendations, as necessary
- Share with fellow task force members examples of how the accountability system impacts their efforts to advance academic opportunities and address inequities
- Develop plans to consult with stakeholders in order to strengthen findings and recommendations

*Agenda Topics*
- Welcome and Overview
- Discuss Proposed Road Map Revisions and Stakeholder Consultation Updates
- Whole Group Share Out: Experiences with the Accountability System
- Study Group Work Time and Working Lunch
- Cross Study Group Exchanges
- Study Group Work Time: Process Feedback and Plan Next Steps

**April 2, 2024**

*Objectives*
- Hear from teachers about their experience with Colorado's accountability system, and from local accountability system grantees about their work to supplement the state accountability system
- Study the frameworks to draft findings and recommendations, as necessary
- Share feedback with other study groups to refine findings and recommendations

*Agenda Topics*
- Welcome and Overview
- Discussions with Teachers
- Learning from the Local Accountability Systems Grant

- Study Group Work Time
- Study Group Exchanges
- Study Group Work Time: Process Feedback and Plan Next Steps

**May 7, 2024**

*Objectives*
- Hear from parents about their experience with Colorado's accountability system
- Review and consider input from public comment survey
- Draft opportunities, challenges, and observations on the accountability system's Frameworks
- If ready, begin to formulate recommendations

*Agenda Topics*
- Welcome and Overview
- Discussions with Parents
- Presentation: Dr. Erin Kane, Superintendent of Schools, Douglas County School District
- Orientation to Public Comments Survey Results
- Presentation and Consideration of Study Group Drafts
- Study Group Work Time: Process Feedback and Plan Next Steps

**June 4, 2024**

*Objectives*
- Increase familiarity with accountability-related advisory groups to CDE, and how they could be useful to the 1241 task force
- Prepare a full draft of background and recommendations for the frameworks
- Begin to examine other topics related to the accountability system

*Agenda Topics*
- Welcome and Overview
- Orientation to Colorado's Technical Advisory Panel and the Accountability Work Group
- Whole Group: Review Draft Background Sections (Assessment and Measures for High School)
- Whole Group: Begin to Review Recommendations Submitted Prior to Deadline
- Whole Group: Continue to Discuss Recommendations
- Small Group: Continue Drafting Recommendations and/or Begin to Study Other Topics
- Whole Group: Share Progress Updates

**August 15, 2024**

*Objectives*
- Share all feedback on the draft report

- Begin to make revisions to the draft report and identify additional work needed between now and September
- Understand the timeline and each person's role for creating the next draft

*Agenda Topics*
- Welcome and Overview
- Whole Group Pulse Check on Full Drat
- Whole Group Feedback on Draft Recommendations
- Small Group Work Time on Framework Recommendations
- Small Group Work Time on Other Recommendations
- Whole Group Synthesis

***September 16, 2024***

***Objectives***

***Agenda Topics***

***October 18, 2024***

***Objectives***

***Agenda Topics***

***October 22, 2024***

***Objectives***

***Agenda Topics***

F. Task Force Consensus Process and Study Group Membership

To develop the findings and recommendations outlined in this report, at the start of 2024, task force members organized into "study groups" focused on various aspects of the accountability frameworks, other elements of the accountability system, and additional topics relevant to the task force's charge that were raised during task force meetings and deliberations for further study. Task force members were assigned to study groups based on interests they expressed in a survey administered by the facilitators. Task force members were divided into the following study groups:

| Study Groups Round 1: Focus on the Frameworks |
| :---: |

| Impact of n-size and participation rates on SPF ratings | Recognition of trends between groups of students | Assessments used for accountability ratings | Measures sufficient for high school | Measures sufficient for early grades |
|---|---|---|---|---|
| • Tomi Amos<br>• Dr. Brenda Dickhoner<br>• Erin Kane<br>• Tony May<br>• James Parr | • Amie Baca-Oehlert<br>• Dr. Wendy Birhanzel<br>• Pamela Bisceglia<br>• Don Haddad, Ed.D.<br>• Dan Schaller<br>• Jen Walmer | • Kathy Durán<br>• Dr. Rhonda Haniford<br>• Ted Johnson<br>• Hon. Rebecca McClellan<br>• Ryan Marks | • Dr. Rob Anderson<br>• Alison Griffin<br>• Tammi Hiler<br>• Dr. Anne Keke<br>• Dr. Robert Mitchell | • Lindsey Gish<br>• Nicholas Hernandez<br>• Catie Santos de la Rosa<br>• Mark Sass<br>• Lisa Yates |

| Study Groups Round 2: Other Elements of the Accountability System | | |
|---|---|---|
| **Improvement Planning** | **Supports and Interventions** | **Awards** |
| • Dr. Anne Keke<br>• James Parr<br>• Ted Johnson | • Pamela Bisceglia<br>• Dr. Rhonda Haniford<br>• Dr. Rob Anderson | • Dan Schaller<br>• Rebecca McClellan<br>• Tammi Hiler |
| **Public Reporting and Engagement** | **Accreditation** | **Assessment Participation/ Opt Out** |
| • Dr. Brenda Dickhoner<br>• Amie Baca- Oehlert<br>• Alison Griffin<br>• Tony May | • Lisa Yates<br>• Don Haddad, Ed.D. | • Ryan Marks<br>• Lindsey Gish<br>• Dr. Wendy Birhanzel |

Members spent significant time in their study groups during and between monthly task force meetings to share their observations, study the relevant challenges and opportunities, conduct stakeholder consultations, and develop recommendations, as necessary, on their assigned study group topic. Task force members also received research and analysis support from CDE, as the statute allowed for CDE support to carry out task force work.

Though the task force conducted its work in these smaller groups, feedback from all task force members was solicited on and incorporated into the content of the background and recommendations included in

this report. Task force members were also encouraged to attend other study group meetings taking place outside of regular task force meetings, as they were able, and to share relevant information gathered from stakeholder engagements. In addition, throughout task force meetings, members engaged in full- and small-group share outs to gather feedback on the findings and recommendations from the rest of the task force members. The purpose of the share outs was also to keep all task force members fully apprised of each group's work so the task force could build connections across all content areas, ensure all topics of interest were being considered, and make visible any interdependencies or conflicts between the recommendations.

This process of sharing and incorporating feedback between study groups repeated multiple times. Task force members used the feedback to make adjustments to their findings and recommendations with the goal of reaching consensus on all recommendations included in this report. All task force members are presenting this report in agreement, unless otherwise noted. *(adjust at the conclusion if necessary)*

## G.  References on Analysis on Plan Type Assignments and Student Demographics

CDE released a series of analyses on the relationship between plan type assignments (including each of the performance indicators - achievement, growth and postsecondary & workforce readiness) in November 2023 and January 2024.  More details can be viewed in the Analysis on SPF and Demographic Characteristics.

Here is a summary of the correlations

| Absolute Value of r | Strength of Relationship |
|---|---|
| r < 0.3 | very weak or no relationship |
| 0.3 <= r < 0.5 | weak relationship |
| 0.5 <= r < 0.7 | moderate relationship |
| r >= 0.7 | strong relationship |

- Achievement.  There tends to be an overall moderate relationship between achievement and the identified student characteristics.  This is true across all school levels for multilingual learners and minority students (although there is a strong correlation at the elementary level).  There is a strong relationship between achievement and poverty across all school levels.  For students with IEPs and Gifted students, there was a weak to moderate relationship.
- Growth.  Across the board, there tends to be a very weak or no relationship to demographic groups.  The exceptions are moderate relationships in ELA/EBRW for poverty at the elementary and high school levels, and for Gifted students at the high school level, and then all groups in math at the high school level.

Table 1. Correlations Between Demographics and MSS/MGP

| | Mean Scale Score | | | | Median Growth Percentile | | | |
|---|---|---|---|---|---|---|---|---|
| | Elem | Middle | Elem+Mid | High | Elem | Middle | Elem+Mid | High |
| English Language Arts | | | | | | | | |
| % Multilingual | -0.57 | -0.51 | -0.56 | -0.56 | -0.2 | -0.09 | -0.15 | -0.23 |
| % Minority | -0.71 | -0.6 | -0.65 | -0.64 | -0.25 | -0.11 | -0.2 | -0.26 |
| % FRL | -0.82 | -0.75 | -0.79 | -0.79 | -0.33 | -0.19 | -0.29 | -0.45 |
| % IEP | -0.37 | -0.47 | -0.41 | -0.52 | -0.17 | -0.2 | -0.17 | -0.28 |
| % Gifted | 0.49 | 0.57 | 0.49 | 0.6 | 0.22 | 0.2 | 0.19 | 0.44 |
| Math | | | | | | | | |
| % Multilingual | -0.55 | -0.5 | -0.54 | -0.48 | -0.14 | -0.09 | -0.1 | -0.3 |
| % Minority | -0.68 | -0.63 | -0.65 | -0.58 | -0.18 | -0.16 | -0.17 | -0.34 |
| % FRL | -0.79 | -0.78 | -0.77 | -0.71 | -0.25 | -0.27 | -0.25 | -0.45 |
| % IEP | -0.36 | -0.47 | -0.38 | -0.52 | -0.16 | -0.19 | -0.14 | -0.37 |
| % Gifted | 0.46 | 0.61 | 0.43 | 0.6 | 0.18 | 0.25 | 0.18 | 0.41 |

*Note.* Correlations are color-coded according to the magnitudes described at the beginning of this document: Green = very weak or no relationship; yellow = weak relationship; orange = moderate relationships; red = strong relationship

- Postsecondary and Workforce Readiness.  Overall, there was a weak relationship between the PWR indicator and the different student groups, ranging from  -0.29 (MLs) to -0.41 (FRL).  When breaking the PWR indicator down to the sub-indicators, however, more variability between the different measures appears.
    - The SAT (EBRW and Math) tended to have a moderate relationship.  The exceptions being math for MLs (weak) and EBRW for FRL (strong).
    - Graduation, dropout and matriculation, on the other hand, tended toward a very weak to weak relationship for all student groups.

Table 3. Correaltions Between PWR, Demographics, and Achievement/Growth

| | SAT-EBRW | SAT-Math | Grad | Matr | Dropout |
|---|---|---|---|---|---|
| % Multilingual | -0.51 | -0.45 | -0.11 | -0.16 | 0.38 |
| % Minority | -0.57 | -0.52 | -0.18 | -0.23 | 0.43 |
| % FRL | -0.75 | -0.68 | -0.2 | -0.32 | 0.48 |
| % IEP | -0.52 | -0.5 | -0.16 | -0.31 | 0.33 |
| ELA MSS | - | - | 0.28 | 0.44 | -0.53 |
| ELA MGP | - | - | 0.24 | 0.2 | -0.29 |
| Math MSS | - | - | 0.35 | 0.51 | -0.5 |
| Math MGP | - | - | 0.35 | 0.43 | -0.3 |

*Note .* Correlations are color-coded according to the magnitudes described at the beginning of this document: Green = very weak or no relationship; yellow = weak relationship; orange = moderate relationships; red = strong relationship

School Performance Framework plan type assignments were also visualized for the task force and summarized in the Accountability Reference Handbook. These graphs provided a closer look at schools on performance watch (e.g., Turnaround, Priority Improvement) and years on the accountability clock. Each dot represents a school.  The higher the dot, the higher the percentage of points on the frameworks.  The further to the right, the greater percentage of identified students groups (i.e., multilingual learners, free and reduced price lunch, minority students, students with IEPs).

- ○ Scatterplot of Schools by Percentage of 2023 Framework Points with Percent of Multilingual Learners.  Summary:  Status on the clock (green and red), on watch (yellow) and not on the clock (blue) are equally distributed across schools serving all concentrations of multilingual learners.
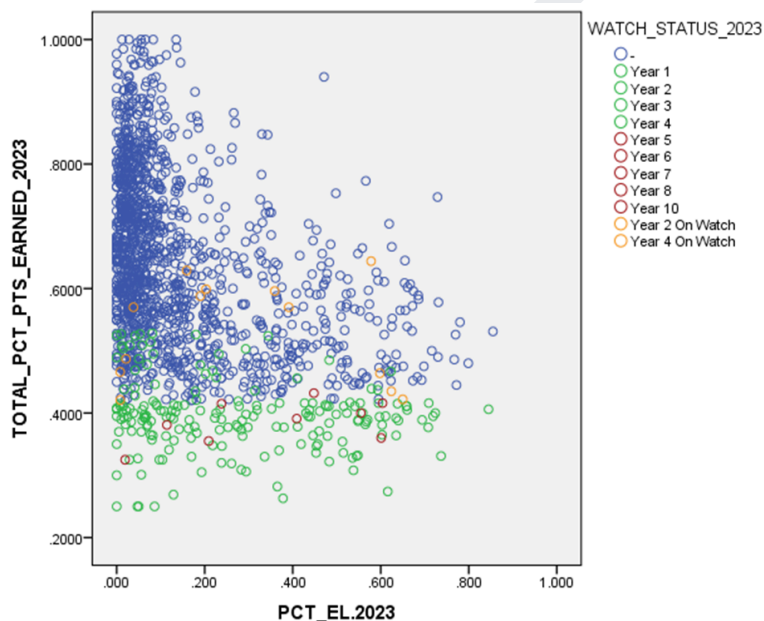
○ Scatterplot of Schools by Percentage of 2023 Framework Points and Free/Reduced Price Lunch. Summary: Note that there is a high frequency of schools that are not on the clock (blue) that also have a high population of students in poverty. There is evidence of some schools on the clock with a lower percentage of students in poverty. The schools much further along on the clock (red) gather around the higher end of the poverty scale.
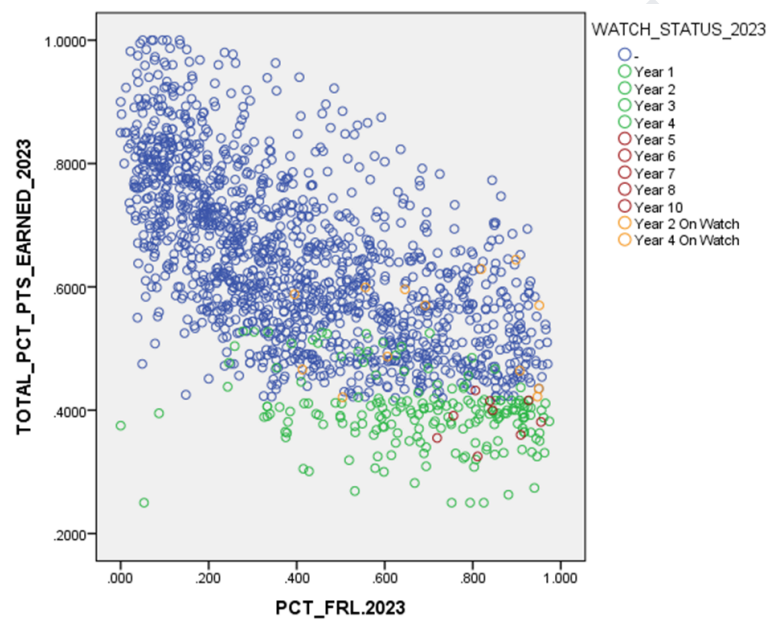
○ Scatterplot of Schools by 2023 Framework Points and Percent of Minority Students. Summary: Similar to the FRL scatterplot, there is a high frequency of schools that are not on the clock (blue) that also have a high population of minority students. There are some schools on the clock with a lower percentage of minority students. The schools much further along on the clock (red) tend to cluster around the higher end of the minority scale.
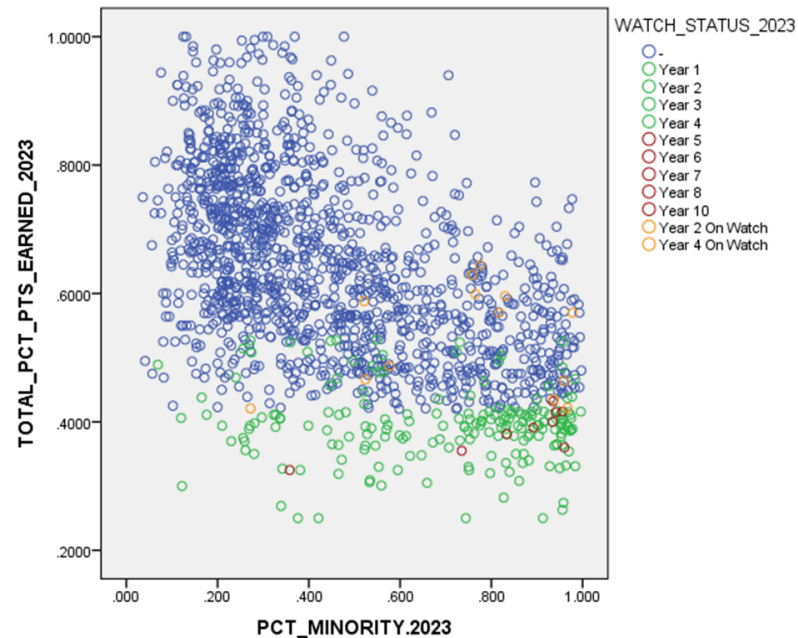
○ Scatterplot of Schools by 2023 Framework Points and Percent of Students with an IEP. Summary:
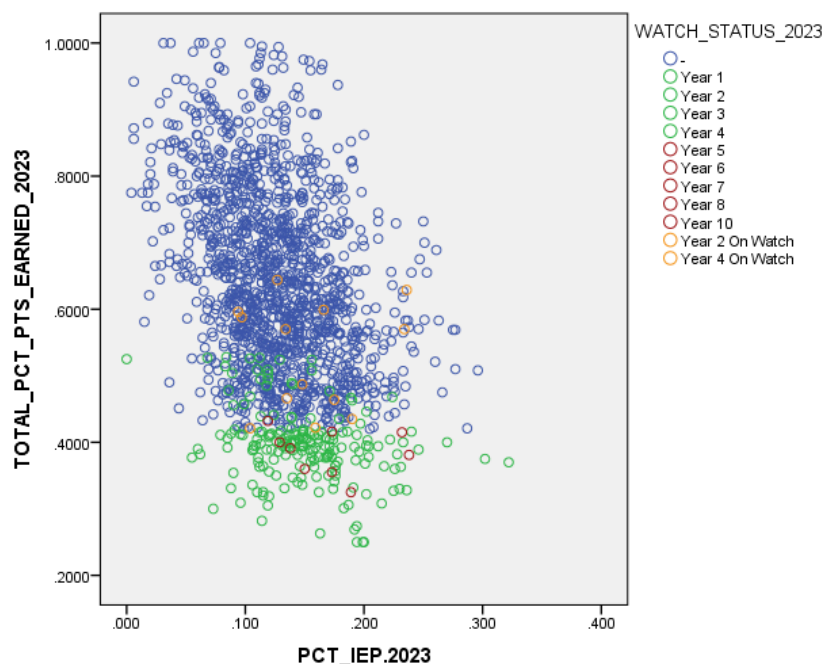


## H. Impact of Assessment Participation Rates on Performance Frameworks

Total participation rates and accountability participation rates are two different measures of assessment participation that are used differently under the state and federal accountability systems.[25]

The **total participation rate** combines all assessment records for each subject area across all grade levels within a given school or district. Parent excusals are counted as non-participants, and so total participation rates best reflect the actual percentage of enrolled students participating in testing. Under Colorado's state accountability system, the total participation rate is only included in the performance frameworks to provide context for interpreting how representative results are. Districts with less than 95% total participation on two or more content areas receive a "Low Total Participation" descriptor and those with more than 95% total participation in two or more content areas receive a "Meets 95% Participation" descriptor. However, these descriptors do not impact framework calculations. The federal accountability system requires a minimum of 95% total participation in required content areas and grades.

The **accountability participation rate** excludes from the calculation those students who have parent excusals from taking assessments. Under Colorado's accountability system, if a district or school has

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[25] Colorado Department of Education (2024)

accountability participation rates below 95% in two or more content areas, the overall rating is reduced by one level. The accountability participation rate is not used in federal accountability calculations.

When calculating achievement under the state performance frameworks, students who did not test are not included in the calculation. Similarly, for student growth calculations, students that do not have two consecutive years of assessments scores are not included.

### I. Accountability Reference Handbook

CDE created the Accountability Reference Handbook to answer the task force's questions about the Accountability and Accreditation system and perform relevant analyses so the task force could better understand the impacts of the current system. It was a living resource that was continually updated as the task force had new questions and requests for the Department. It includes information about the performance frameworks, the Colorado Growth model, small systems, and the Accountability Clock, among other topics.

### J. Local Accountability Systems Grant

The Local Accountability Systems Grant was established by SB 19-204 "to provide grant money and flexibility to local education providers to enhance their local accountability and continuous improvement systems."[26] It is meant to supplement the state accountability system and can:

- Fairly and accurately evaluate student success using multiple measures to develop a more comprehensive understanding of each student's success;
- evaluate the capacity of the public school systems operated by the local education provider to support student success; and
- use the results obtained from measuring student success and system support for student success as part of a cycle of continuous improvement.

Participation in the Local Accountability Systems Grant does not replace the state performance frameworks, nor does it affect state plan types.

A list of the districts participating in the first cohort of the grant and the description of their projects are listed in the below table.[27] An evaluation of the third year of the grant can be found on the CDE Website.

| Lead Applicant | Participating Schools and Districts | Local Accountability System Summary |
|---|---|---|
|  |  |  |

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[26] Colorado Department of Education (2023)
[27] Colorado Department of Education (2020)

Draft 2 Working Document - 1241 Task Force - Published September 7, 2024

| | | |
|---|---|---|
| Boulder Valley School District RE-2 | Canon City School District Greeley-Evans School District 6 Gunnison Watershed School District | Four districts in a variety of settings will be working together to measure the opportunities schools and districts provide to students (e.g., career and technical education programs, advanced coursework, extra-curricular, and a safe learning environment), with CU Boulder's Center for Assessment Design Research and Evaluation (CADRE) supporting the selection of measures, implementation, and evaluation of the project. |
| Delta County 50J - Vision Charter Academy | | A charter school is partnering with Momentum to create a set of key indicators to measure their individually designed custom education approach in a way that can be expanded to any individualized education program in the state. |
| Buena Vista School District | Akron School District Buffalo School District East Otero School District Frenchman School District (Fleming) Hanover School District Haxtun School District Holyoke School District Kit Carson School District La Veta School District Las Animas School District Monte Vista School District West Grand School District Wiggins School District | The Student Centered Accountability Program (S-CAP) was approved by a SBE resolution in 2015, and includes 14 districts working together with Generation Schools, CU Denver and Battelle for Kids to align state and local accountability efforts by integrating additional indicators and peer feedback using System Support Reviews (SSRs) to support a focus on the whole child and enhance system capacity for stakeholder engagement. The goals of the proposal are to strengthen district capacity, improve the reliability, validity, and generalizability of the SSRs and focus on sustainability of S-CAP (e.g., onboarding, supplemental reports, ROI). |
| Denver Public Schools | | The district intends to support their Reimagine SPF committee in discussing and determining additional district wide measures within the thematic areas of Whole Child, School Culture, and Academic Achievement and Growth with an overarching focus on equity. |
| District 49 (Falcon) | | The district will continue to enhance the development of Key Performance Indicators (KPI) using the Baldrige Framework and community input |

| | | |
|---|---|---|
| | | to focus on areas such as School Leadership, Student Learning, Educator Effectiveness, Student and Family Satisfaction, School Climate and Safety, and Operational Efficiency and Effectiveness. This will be connected to continuous improvement using Envisio. |
| Fountain-Fort Carson School District 8 | | The district has developed a Teaching and Learning Framework (TLF) to determine effective instruction across its schools, and intends to work with WestEd adjust the tool to support formative, descriptive, and comprehensive measures to inform improvement and implementation planning. The district will focus on developing measures within social-emotional learning, school culture and climate, and home/school partnership. |
| Garfield County School District 16 | | The district will partner with Marzano Academies to design a reporting system reflective of a competency-based and personalized learning system within the district using measurements of performance scales and competencies that is valid, comparable, and can be replicated across the state. |
| Jefferson County - New America School Lakewood | Brady Exploration School (Jefferson Co) Denver Justice High School (Denver) Durango Big Picture School (Durango) HOPE Online High School (Douglas Co) Jefferson High School (Greeley) New America School - Aurora (CSI) New America Schools - Thornton (Adams 12) Southwest Open School (Cortez) Rise Up Community School (Denver) Yampah Mountain High School (Glenwood Springs) | A consortia of 11 Alternative Education Campuses (AECs) are partnering with Momentum to pilot the Measuring Opportunity Pilot Project (MOPP) to align additional measures to each school's specific AEC programming and services, including evaluating student success and school capacity. Measures are focused in four areas: optional measures, opportunities measures, a multi measure of student reengagement index, and comprehensive school reviews. |

| | | |
|---|---|---|
| Jefferson County Public School District | | The district intends to measure and report on skills valued by the community, including: content mastery, critical thinking and creativity, civic and global engagement, communication, selfdirection and personal responsibility, agility and adaptability, collaboration, and leading by influence. Metrics, analytics and data displays will be developed to inform continuous improvement. |
| Northeast Colorado BOCES | Plateau School District RE-5 Revere School District Yuma School District 1 | The BOCES and three districts intend to partner with Northwest Evaluation Association (NWEA) to develop cut-points to use the assessment as an accountability measure, align the unified improvement plan to NWEA and College Board Measures, develop a writing assessment, and develop a stakeholder monitoring tool to display results. |
| Westminster Public Schools | Brush School District RE-2J | Two districts intend to partner and work with Cognia, Marzano Academies, and CU Denver to design and implement a set of quality indicators that are aligned to competency based practices and outcomes. The quality indicators will be used by internal quality review teams and can be replicated to other districts in the state. |

### K. 1215 Task Force Recommendations and Stakeholder Engagement Process

Colorado's 1215 Task Force made a series of recommendations for the accountability system's PWR indicator, which informed the 1241 Task Force's recommendations.[28] The relevant recommendations are outlined in the below table.

| 1215 Task Force's Recommendations for Updates to PWR Measures in Colorado's Accountability Performance Framework | |
|---|---|
| **PWR Sub-Indicator** | **Suggested Change** |
| SAT Evidence-Based Reading/Writing | Remove from the PWR Indicator |
| SAT Math | Remove from the PWR Indicator |

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[28] Office of Postsecondary Workforce Readiness, Student Pathways Unit (2023)

| Concurrent Enrollment | Not currently part of the performance framework; add this as a sub-indicator in the PWR Indicator |
|---|---|
| Graduation Rate | Keep in the PWR Indicator |
| Dropout Rate | Keep in the PWR Indicator; reduce the number of points so it is worth fewer points than Graduation Rate |
| Matriculation Rate | Keep in the PWR Indicator; modify reporting so military enlistment and industry credential attainment is required to be included. Consider increasing the weight of this measure, as it covers matriculation into a variety of beneficial PWR programs |
| District Option | Consider adding to the PWR Indicator |

To inform the 1215 task force's recommendations, Slalom, Inc., facilitated a series of stakeholder engagements, including:

- Held panel discussions so the Task Force could hear directly from various stakeholder groups, including 20+ high school and college students, industry partners, K12 and postsecondary educators.
- Conducted four human-centered design (HCD) workshops, which served as critical inputs to the Task Force's recommendations and to reflect the perspectives of key stakeholder groups.
- Received recommendation suggestions from 20 public survey submissions.
- Created a Future State Service Design Blueprint to support the recommendations, a tool that illustrates the process of effectively administering PWR programs and clarifies how each recommendation impacts the learner journey.

L. Task Force Considerations and Activities

*Improvements to the accountability system*

The task force also was required to consider "improvements to the accountability and accreditation system to expand and incentivize academic opportunities and address inequities." To do this, the task force engaged CDE to learn more about Colorado's Education Accountability System. Per H.B. 23-1241, "the Department shall provide information and staff support to the task force Chairperson to the extent necessary for the task force to complete its duties."

In particular, CDE reviewed for the task force the state accountability system's history, theory of action, and major components. Throughout the task force's deliberations, CDE staff answered questions and conducted analyses requested by task force members. For example, CDE guided the task force through an exercise to examine correlations between accountability framework results and different student demographics, and gave a brief overview of how participation in state assessments impacts a school or district's results on accountability frameworks. Of note, CDE created for the task force the Accountability Reference Handbook, which tracks all questions asked by the task force to CDE and CDE's responses to these questions.

After engaging in extensive learning about the state's education accountability system, the task force members considered what is working and what could be improved for each element of the state's accountability system. These considerations served as the foundation for the topics the task force prioritized to study in greater detail and develop recommendations.

*Promising practices*

Per the statute, the task force was also required to consider "promising practices in schools and school districts" in its deliberations. Throughout its work, the task force reviewed the following promising practices:
- After developing an initial list of academic opportunities and inequities that may impact academic achievement gaps, the task force generated examples of how districts or schools successfully mitigated identified inequities. These practices served as examples of how students can have equal access to academic opportunities.
- CDE shared background information and framing on the School Transformation Grant Program. This presentation shared the interventions that can support the improvement efforts of Turnaround Schools.
- Task force members heard from representatives of the 1215 task force, who made a series of recommendations for the accountability system's PWR indicator. These recommendations were relevant to the 1241 task force's own deliberations and recommendations to the accountability system.
- CU Boulder and the Center for Assessment presented information to the task force about other state's accountability systems, which helped the task force review other states' approaches to accountability. The presenters also offered a list of design elements the task force could consider including in Colorado's accountability system.
- CDE shared with the task force information on the Local Accountability Systems Grant, which grants "money to local education providers that adopt local accountability systems to supplement the state accountability system." Local accountability systems offer another avenue to hold schools and districts accountable for student outcomes, while honoring the unique contributions these schools and districts offer their school communities.

*Recommendations for legislation or rules*

Lastly, the task force was required to consider "recommendations for legislation or rules, as necessary." The task force divided into small groups to study various elements of the accountability system and other topics raised by the group and develop recommendations that could address the challenges and opportunities associated with each of these components. The remainder of this report outlines the task force's recommendations to improve Colorado's accountability system, focused on the following elements and topics:

A. Impact of N-size on Performance Frameworks
B. Recognition of Trends Between Similar Groups of Students
C. Assessments Used for Accountability Ratings
D. Measures Sufficient for High School
E. Measures Sufficient for Early Grades
F. Public Reporting and Engagement
G. Improvement Planning
H. Supports and Interventions
I. Awards
J. Accreditation
K. Testing Participation and Opt Out

*The Audit*

To support its deliberations, the statute stated that the task force may review "the results of the statewide education accountability systems audit described in section 2-3-127." During the September, 2023 meeting, the task force reviewed the legislatively commissioned [Evaluation of Colorado's Education Accountability System](#) (November 2022) report, conducted by Human Resources Research Organization (HumRRO). The audit found that the "performance indicators and measures used in Colorado's statewide education accountability system provide a reasonable and appropriate basis for objectively measuring the performance of districts and public schools." However, the audit also points out inequities and areas for improvement in the current accountability system. The task force continued to refer to the audit throughout its deliberations to inform its findings and recommendations.

*Local accountability system grant*

The task force also had the option to review "the results of the local accountability system grant program created in section 22-11-703." At the April 2, 2024, meeting, CDE gave an overview of the Local Accountability Systems Grant, which grants "money to local education providers that adopt local accountability systems to supplement the state accountability system." Task force members also met with CDE's external evaluation of the grant program, Robert Reichardt.

Following these presentations, task force members met with Local Accountability System grantees (e.g., district administrators) to learn of their experience with the grant program.

*Results of school transformation grant program*

The task force chose to review the "results of the school transformation grant program created in section 22-13-103," to better understand how the accountability system can identify schools in need of additional support and how this support can lead to school improvement. The most intensive support offered to schools under this Grant Program is the Transformation Network, a highly collaborative three-year partnership between schools, their districts, and CDE. At the December meeting, researchers from CU-Boulder shared their findings from the evaluation of the Transformation Network, which highlighted the conditions and practices that can lead to better outcomes in turnaround schools.

*Interim and final reports from 1215 Task Force*

In its deliberations, the task force also considered the "interim and final reports from the secondary, postsecondary, and work-based learning integration task force created in part 2 of article 35.3 of title 22." At the January 9, 2024, meeting, representatives of the 1215 task force shared their final recommendations and process for stakeholder engagement. Part of their recommendations focused on the accountability system's PWR indicator, which was relevant to the 1241 task force's efforts.

*Promising practices from other states*

When studying the accountability system, the task force also considered "promising practices from other states as identified by task force members." In particular, the task force reviewed how other states have approached accountability and accreditation while still meeting the requirements of federal law. At the January 17, 2024 meeting, CU Boulder and the Center for Assessment presented on other state's accountability systems, highlighting ways states approach accountability differently, and ways in which states share common approaches. The cases included:
- **Oklahoma,** which has an accountability system that, according to the presenters, stays close to the requirements of ESSA.
- **Michigan,** which was presented as offering a dual system of accountability to meet federal requirements, with multiple views of student success.
- **California,** which was described as including a dashboard approach to share information on school performance.

The presenters also offered a list of design elements they emphasized are critical to any accountability system.

In addition to this presentation, task force members performed independent research on other states' accountability systems, such as Georgia and Indiana.

*Leading indicators or instructional practices*

The task force discussed the importance of instructional practices and the leading indicator of shifting adult practices during the discussions on the opportunities and inequities that are required for all schools to succeed. Task force members discussed the importance of high quality instructional materials, strong preparation and professional learning for teachers, and the support to collaborate and plan for quality instruction.

### M. Stakeholder Consultations

H.B. 23-1241 required that the task force "shall consult with parent organizations, student organizations, and additional stakeholders as needed to address questions necessary to finalize its findings and recommendations."[29] The task force conducted its stakeholder consultations in three primary ways:

- Panels conducted during task force meetings with fellow task force members, teachers, and parents
- A public comment survey disseminated in both English and Spanish
- Additional interviews and focus groups conducted with parents, students, educators, and other community stakeholders by the task force either during publicly-scheduled task force meetings or in individual settings (e.g., parent advisory councils, board meetings)

*Panels*

At the March 2024 meeting, task force members with school- or district-level roles were given an opportunity to share their experience with the accountability system and how the system impacts their ability to advance academic opportunities and address inequities. Task force members shared their experiences in one of three groups: rural school systems, large school systems, and school systems that serve high percentages of diverse students. These panels allowed the task force to tap into the expertise and experience of their fellow members and incorporate these perspectives in their findings and recommendations.

At the April 2024 meeting, the task force hosted a conversation with teachers from TeachPlus and the Colorado Education Association (CEA). Teachers affiliated with these organizations offered the task force additional insight into educators' experience with the current accountability system, and when possible, on the issues currently under consideration by the task force. The teachers from TeachPlus shared findings and corresponding recommendations from their research on what teachers across the state believed the purpose of education should be and what constitutes a high-quality school. They also offered examples of how other states measure school quality and student success through their own accountability systems. The representatives from CEA shared the impacts of the current accountability system on both urban and rural districts, and how the accountability system impacts academic

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[29] Colorado General Assembly (2023)

opportunities and inequities particularly for Colorado's students who are marginalized. This presentation included findings from CEA's 2023 all-member survey.

Lastly, at the May 2024 meeting, the task force heard from parent representatives who included members of the Resident Leadership Council (RLC), School and District Accountability Committees (SAC/DAC) and the State Advisory Council for Parent involvement in Education (SACPIE). The panelists spoke about where and how they received information about their student's school and district, what characteristics make up a high-quality school, and how parents can participate in holding schools and districts accountable, among other topics.

*Public Comment Survey*

The task force issued a public comment survey to gather feedback on Colorado's accountability system from March 27–April 28. It was offered in both English and Spanish and was shared on CDE's website and through various communications channels (including social media). The task force members also disseminated the survey to their networks using suggested email and social media messages. The survey ultimately recorded over 1,800 responses: 576 had at least one response to a survey question that was relevant to the task force's deliberations, and the other 1,224 had only partial information limited to personal background (i.e., stakeholder type, region of the state) but with zero response to the survey questions.

The survey largely received responses from educators in the central part of the state who worked in suburban districts. In addition, of the top 10 districts the survey received the most responses from, all but one of them were from the top 20 most populous districts in Colorado. This means that most of the survey responses came from the most populous parts of the state.

Task force members were given a tool for filtering and analyzing results from the survey by various demographics or topics of interest.

*Stakeholder Interviews and Focus Groups Conducted Outside of Full Task Force Meetings*

Task force members were also instructed to conduct consultations with external stakeholders to gather further feedback on the accountability system. The facilitators provided task force members with a template to conduct these consultations, and task force members conducted them between official task force meetings in either publicly-scheduled task force meetings or in individual settings, such as in parent advisory councils or board meetings. Task force members were asked to share notes from these consultations with the full task force so the information collected could inform discussions on each element of the accountability system.

==Task force members: under your study group topic, please list the individuals and organizations you consulted with to develop your background and recommendations. If you did not consult anyone, please write N/A.==

*Impact of N-Size on SPF Ratings*
- Pueblo 60 District Accountability Committee members

*Recognition of Trends Between Groups of Students*
- Lisa Medler, CDE Executive Director of Accountability and Continuous Improvement
- Additional CDE staff
- Colorado Education Initiative
- CASE
- Various district personnel
- School leaders
- Pueblo 60 District Accountability Committee members

*Assessments Used for Accountability Ratings*
- CDE Chief Assessment Officer
- CDE Commissioner of Education
- Pueblo 60 District Accountability Committee members

*Measures Sufficient for High School*
- Members of the HB22-1215 Task Force
- Lisa Medler, CDE Executive Director of Accountability and Continuous Improvement
- Colorado Succeeds
- Colorado Education Initiative
- School leaders
- Pueblo 60 District Accountability Committee members
- School leaders from elementary and middle schools

*Measures Sufficient for Early Grades*
- Elliot Regenstein
- Pueblo 60 District Accountability Committee members

*Public Reporting and Engagement*

*Improvement Planning*

*Supports and Interventions*
- CDE Executive Director of School and District Transformation
- CDE Accountability Pathways Director

*Awards*

*Accreditation*

*Participation and Opt Out*

<mark>*These are the stakeholder consultation notes we have; please indicate what study group topic they informed*</mark>

- The Arc of Adams; The Arc of Pueblo; The Association for Community Living in Boulder & Broomfield Counties; The Arc of Larimer; The Arc of West Central Colorado
- St. Vrain Valley school teachers, parents, students, and business leaders
- Douglas County School District, District Accountability Committee members
- Higher Education Subject Matter Experts in Multilingual Education—HELDE group
- Douglas County School District school leaders and the District Accountability Committee

## N. Working Definitions of Key Terms

The Working Definitions of Key Terms includes a list of terms and definitions associated with Colorado's Accountability and Accreditation system. These were presented to the task force at the meeting on September 26, 2023.

## O. Examples of California's and Indiana's Statewide Dashboards

*California*

*Indiana*



# Welcome to Indiana Graduates Prepared to Succeed (GPS)

We know that students are more than a single test score. In addition to academic mastery, Indiana GPS will elevate a number of key characteristics essential to preparing Indiana's students for their futures, whether they choose employment, enrollment, or enlistment leading to service.

Scroll to continue

| PREK-GRADE 2 | GRADES 3-8 | GRADES 9-12 | GRADUATION AND BEYOND |
|---|---|---|---|
| Expanding quality, affordable, and accessible early learning | Delivering educational fundamentals: emphasis on reading and STEM | Providing seamless transitions for Indiana students | Supporting Indiana students for a brighter future |

As the global economy changes and technology advances, we must work together to ensure every student develops knowledge and skills throughout the K-12 years and forges connections to college and career pathways so they are prepared for life beyond high school.

### 6TH GRADE MATH GROWTH

**35% of Indiana sixth graders** are meeting their math growth goals.

Full Report >

### GRADUATION PATHWAYS COMPLETION

**89%** of Indiana students complete their graduation requirements.

Full Report >

### EMPLOYMENT & ENROLLMENT

Over the course of a lifetime, Hoosiers with education beyond high school are likely to earn

**$1,000,000**

more than those with only a high school diploma.

Full Report >

## Where are we going?

### 3rd Grade Literacy

Percentage of grade 3 students showing proficiency on IREAD-3.

81.9%    95%
2023    2027

### Graduation Pathways Completion

Percentage of grade 12 students who complete graduation requirements.

89%    95%
2023    2030

### Employment & Enrollment

Percentage of grade 12 students employed or enrolled, *within Indiana*, one year after their expected graduation year. Goal TBD.

84.5%
2021

## Indianapolis Public Schools

120 E Walnut St, Indianapolis, IN 46204  •  (317) 226-4000  •  **Website**

| 👥 Grades PreK - 12th | 🏫 22,027 Enrolled | 🍴 67.6% Free/Reduced Lunch | 🏛 School Corporation | 🧭 Metropolitan |

### Benchmarked Headline Indicators

**🧩 PREK-GRADE 2**  ·  **📖 GRADES 3-8**  ·  **🎓 GRADES 9-12**  ·  **🌐 GRADUATION AND BEYOND**

**Kindergarten Readiness**
Percentage of students demonstrating the skills necessary to be considered ready to start kindergarten.

*Coming soon*

**3rd Grade Literacy**
Percentage of grade 3 students showing proficiency on IREAD-3. Goal: 95% by 2027.

60.6% ▼ 2.2%   State: 81.9%

**Graduation Pathways Completion**
Percentage of grade 12 students who complete graduation requirements. Goal: 95% by 2030.

79.9% ▲ 2.4%   State: 89%

**Employment & Enrollment**
Percentage of grade 12 students employed or enrolled, *within Indiana*, one year after their expected graduation year. Goal TBD.

TBD   TBD
76.9% ▼ 0.5%   State: 84.5%

**PreK-Grade 2 Literacy**
Percentage of PreK-Grade 2 students demonstrating progress in essential early reading skills from one year to the next.

*Coming soon*

**6th Grade Math Growth**
Percentage of grade 6 students meeting their individual growth targets on the math ILEARN. Goal: 45.8% by 2030.

19.9% ▲ 3.0%   State: 35.1%

**College & Career Credentials**
Percentage of grade 12 students earning high quality college and career credentials. Goal: 60% by 2030.

*No data available*

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**🎓 GRADES 9-12**

**Graduation Pathways Completion**   79.9% ▲ 2.4%   State: 89.0%

Number of students in the grade 12 cohort completing all graduation requirements prior to September 30 of their expected graduation year divided by the total number of students in the grade 12 cohort.

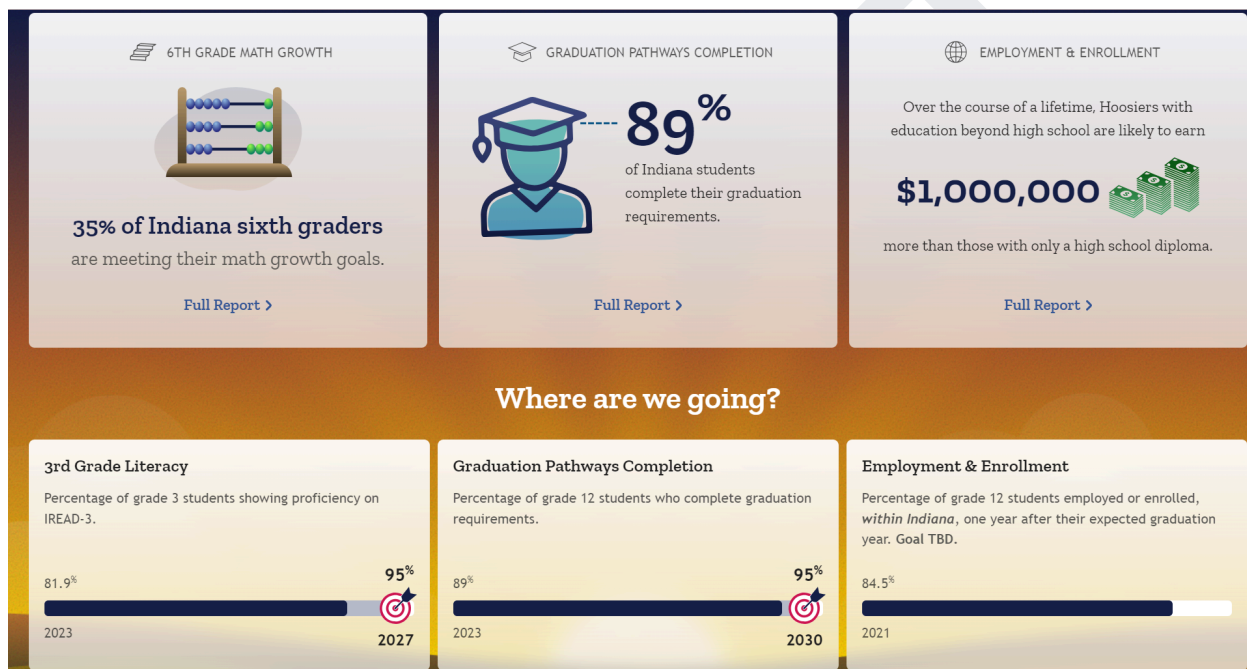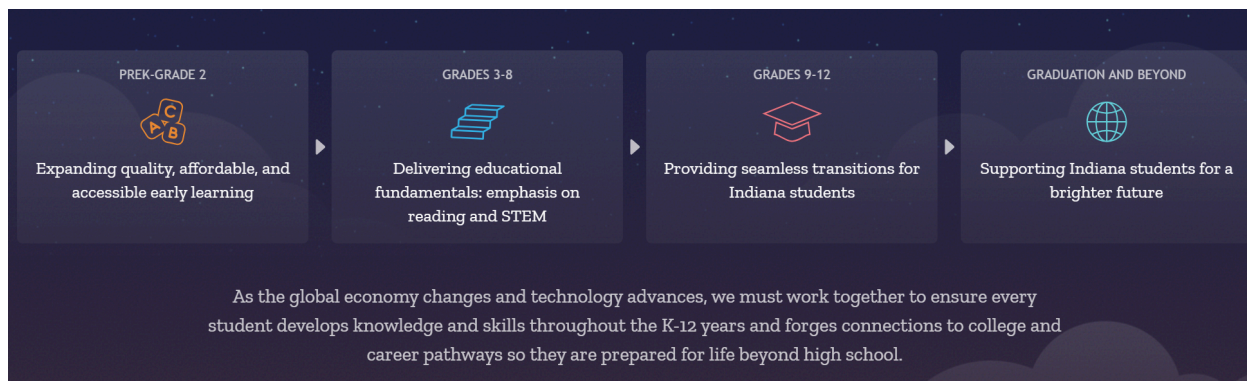| | | |
|---|---|---|
| All Students | 79.9% | ▲ 2.4% |
| White | 64.4% | ▼ 1.5% |
| Black | 79.9% | ▲ 4.4% |
| Hispanic | 85.2% | ▲ 0.6% |
| English Learner | 94.0% | ▲ 3.0% |
| Economically Disadvantaged | 87.8% | ▲ 3.3% |

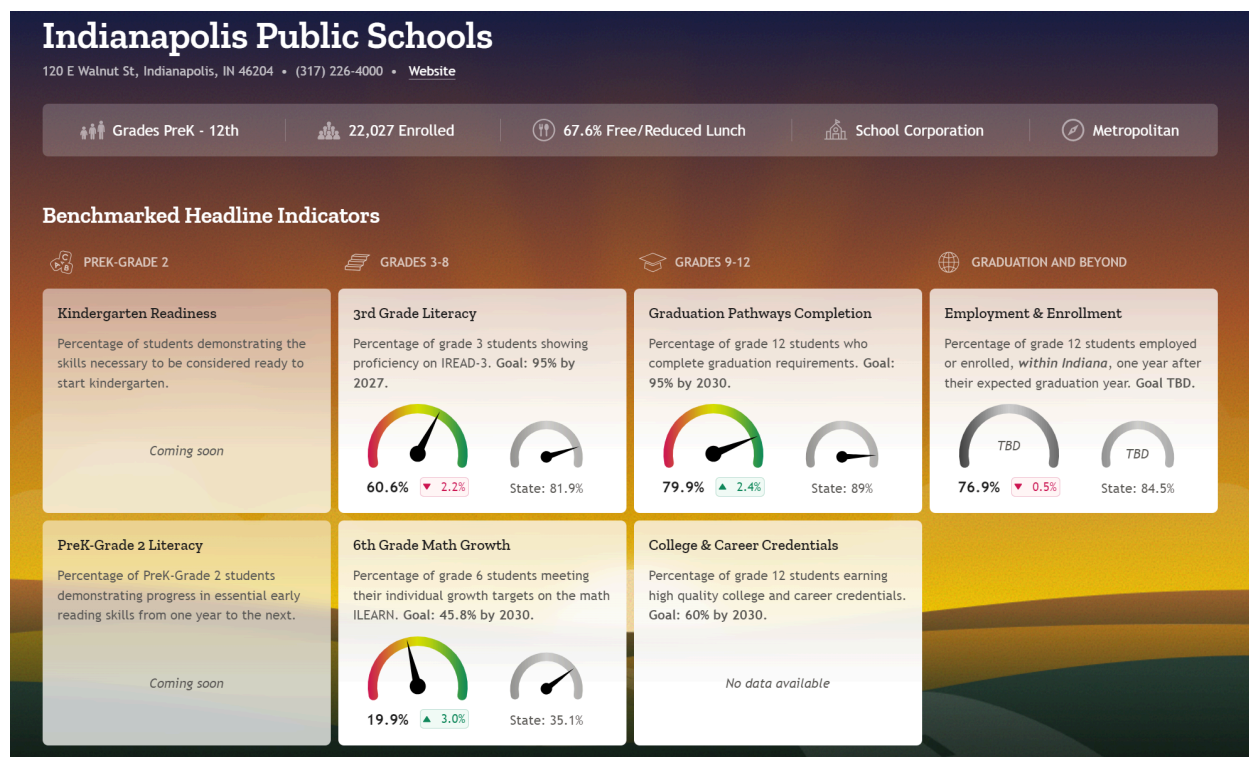— Corporation   — State

About    **Full Report**

==**Need to put it in the correct place—it is referenced in an opportunity in public reporting.**==

| Group | Advisory to… | Summary | Notes for Consideration |
|---|---|---|---|
| | | | |

| | | | |
|---|---|---|---|
| School Accountability Committees | Principal, DAC, District | Families, community members and school representatives provide advice to the principal on improvement planning development and monitoring, budget and other activities. More detail in [District Accountability Handbook](#) (starting on p. 23) | Overall, SACs are moving forward and typically productive. Positive support could be helpful. There may be some responsibilities that are worth re-examining (e.g., input on system for principal evaluation). |
| District Accountability Committees | Local School Board | Similar activities as SACs but at the district level. More detail in handbook (starting on p. 21) | Overall, DACs are moving forward and typically productive. Positive support from the task force could be helpful. There may be some responsibilities that are worth re-examining (e.g., input on measures for the system used for principal evaluation). |

| Technical Advisory Panel | Department of Education and State Board of Education | The Technical Advisory Panel for Longitudinal Growth (TAP) consists of state and national experts on longitudinal measurement of academic growth for state accountability purposes, convened by the Commissioner of Education to provide recommendations to the State Board of Education. The TAP was created in accordance with the Education Accountability Act of 2009 (SB-09-163). More detail available on the [website](). | Overall, TAP is moving forward and typically productive.  Positive support from the task force could be helpful. |

| | | | |
|---|---|---|---|
| Statewide Advisory Council on Parent Involvement in Education (SACPIE) | Policymakers, Department of Education and educators | SACPIE was established in 2009 and is the State Advisory Council for Parent Involvement in Education. The Colorado General Assembly found that it was in: "...the best interests of the state to create a state advisory council for parent involvement in education that will review best practices and recommend to policy makers and educators strategies to increase parent involvement in public education, thereby helping improve the quality of public education and raise the level of students' academic achievement throughout the state." (C.R.S. § 22-7-301(2), 2012). More detail available on the website. | Overall, SACPIE is moving forward and typically productive. Positive support from the task force could be helpful. |

| Accountability Work Group | Department of Education (not legislated) | The Accountability Work Group has served as a policy advisory group to research and explore ideas in support of federal and state accountability policies and decision points (e.g., Every Student Succeeds Act implementation). This group seeks to collect input from additional stakeholders in developing recommendations. It was first convened by the Commissioner of Education in 2014 to gather input on improving the state accountability performance framework reports.  More detail available on the [website](#). | CDE has chosen to convene this group to receive ongoing feedback on implementation of accountability policies. Statutory authorization is not needed, but it may be helpful to the task force to ensure a group like this is leveraged. |

**EDITING NOTES:**

Design and editing needs that remain:

- Cover page

- Logos

- Tables or call out boxes if needed

Proofing/formatting:

| What | Look-for | Notes |
|------|----------|-------|
| Heading 1 | Title of Sections | Example: Introduction |

| Heading 2 | Titles of Sub-sections | Example: Letter from Chairs |
|---|---|---|
| Normal Text | Font size 11 | |
| Overall font? | Calibri | |
| Overall spacing? | 1.15 | |
| Eliminate contractions | | |
| Links | Use footnote | Colorado Department of Education (2022).<br><br>(you would link the words "Colorado Department of Education") |
| Citations | Use footnote | |
| Margins | 1" | |
| Consistency | Task Force | capitalized |
| | | |