



**COLORADO**

Department of Education

# **District Accountability Handbook: Identification Supplement**

**September 2025**



*This guidance is a supplement to the [District Accountability Handbook](#). It is aimed at districts and schools identified through the state and federal accountability systems and provides an overview of timelines, expectations, and support.*

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## Background

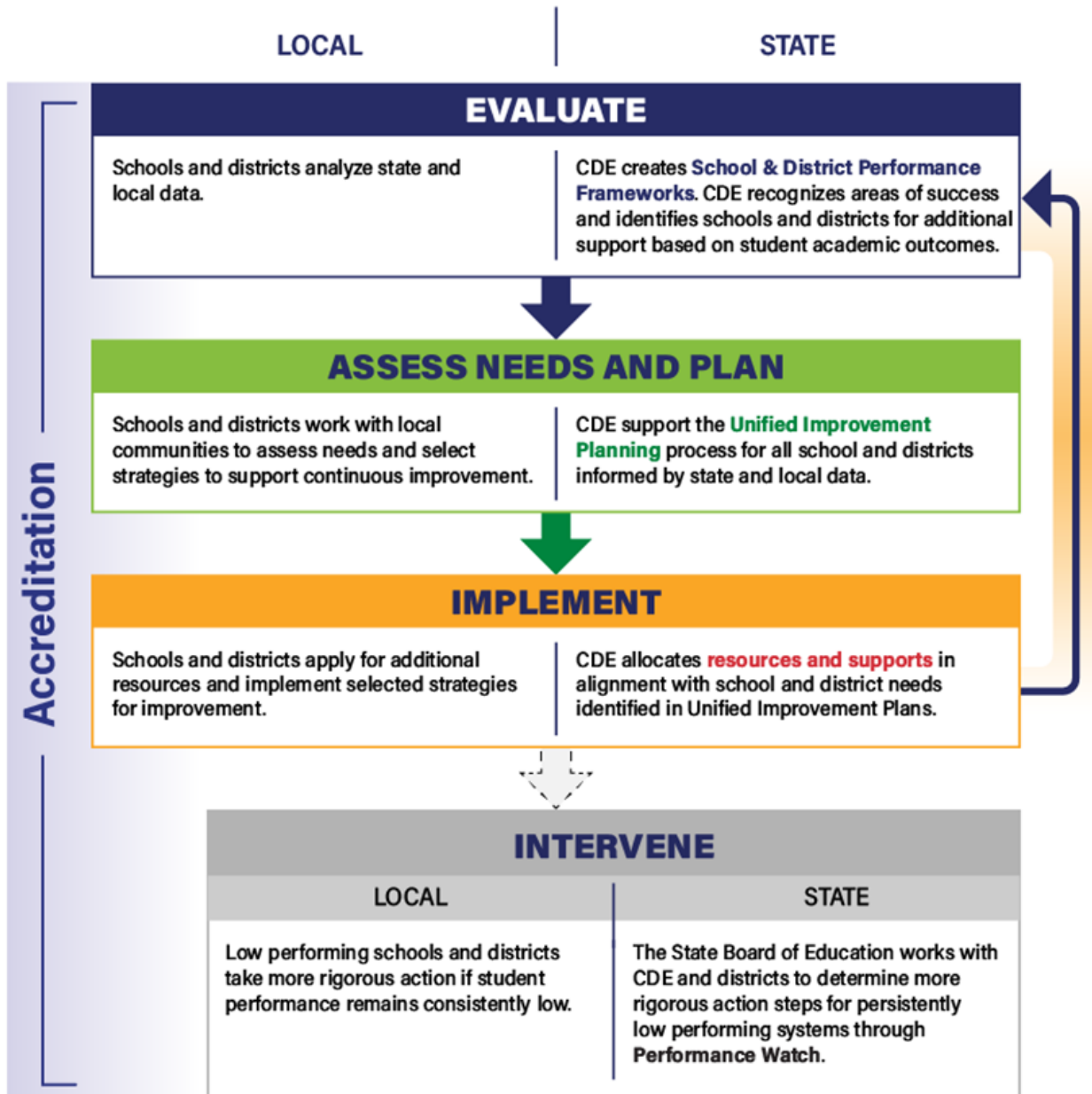
State law requires that the Colorado State Board of Education and the Colorado Department of Education hold all districts and schools accountable for student performance. The state annually evaluates student performance in districts and schools through a set of consistent, objective measures, and then uses this information to inform awards, sanctions, and supports. The state also holds districts and schools accountable through various program accountability requirements, including those under the federal Elementary and Secondary Education Act (ESEA) which was reauthorized as the Every Student Succeeds Act (ESSA) in 2015.

The [District Accountability Handbook](#) provides a broad overview of requirements for all districts and schools, detailing stakeholder roles; accountability measures; plan development, submission, and review; and other accountability and reporting requirements. For sites that are identified through the state (i.e., Priority Improvement, Turnaround, On Watch, On Hold - Year x) and/or through the federal process (i.e., Comprehensive Support and Improvement (CS) - Lowest 5% or Low Graduation, Targeted Support and Improvement (TS), Additional Targeted Support (A-TS)), this supplement provides a deeper dive into the process for identification, the requirements, timelines, and available supports.

The figure below summarizes the state's theory of action for how these elements interact each year. The state is expected to evaluate school and district performance (e.g., performance frameworks), schools and districts engage with their data to plan (e.g., improvement planning) and implement approaches to improvement. The state also provides supports (e.g., school improvement grants) and interventions to identified schools and districts. Stakeholder engagement is woven through each step. Together, along with an agreement to implement statutes and regulations, the accountability elements contribute to district accreditation.



Figure: Accountability Theory of Action





## Identification Process for State Accountability

Districts and schools assigned to a Priority Improvement or Turnaround plan have the lowest student outcomes of all districts and schools in Colorado, according to the District and School Performance Framework (DPF/SPF) reports. The DPF and SPF reports are based on the key Performance Indicators: Achievement, Growth, and Postsecondary and Workforce Readiness. For more information about the performance framework calculations, go to [School and District Performance Frameworks](#).

### Performance Watch

All schools and districts with an identified need through the state accountability system are considered to be on Performance Watch. This includes sites on the accountability clock (i.e., Priority Improvement or Turnaround at Year 1 or higher), On Watch (i.e., sites that have earned an Improvement plan type or higher after being on the accountability clock for at least two years) or On Hold (i.e., received an Insufficient State Data rating after being on performance watch in a prior year). For the schools and districts on Performance Watch, there are unique requirements and supports, in addition to those for all districts and schools. This includes state statutory and regulatory requirements, timelines for actions on each year of Priority Improvement or Turnaround, implications for improvement planning and federal programs, and available resources. A summary of these requirements is available in [Appendix A](#).

### Accountability Clock

A school, district or the Institute that earns a Priority Improvement or Turnaround (PI/T) plan type is considered to be on the accountability clock. The department documents the plan type and years on the clock on the performance frameworks. While there are additional requirements for these sites, there are special targeted supports and requirements associated with this status. If a site earns an Improvement plan type or higher after one year, then they fully exit performance watch. If a site has five or more years on the accountability clock, then the State Board of Education is compelled to intervene.

### On Watch

To ensure stability in the clock exiting process, the legislature added the requirement in 2019 that sites that are on the accountability clock for two or more years must earn an Improvement plan type or higher for two consecutive years to fully exit performance watch. The site is considered to be “on watch” during that time. Certain targeted supports and requirements remain in place for these sites. If a site earns a Priority Improvement or Turnaround rating after being On Watch, then the clock resumes.

### On Hold

Schools and districts that earn an Insufficient State Data (ISD) plan type after being on performance watch in the prior year will “hold” at the previously assigned year on performance watch until the site earns its way off of performance watch. These sites are eligible for supports and still expected to meet associated performance watch requirements.



**Example: Performance Watch Progression**

2024 Final Plan Type	2025 Final Plan Type	2026 Final Plan Type	2027 Final Plan Type
Priority Improvement - Y3 On Clock	Priority Improvement - Y4 On Clock	Improvement - Y4 On Watch	Improvement (Fully exited performance watch)
Priority Improvement - Y1 On Clock	Improvement (Fully exited performance watch)	Improvement	Priority Improvement - Y1 On Clock
Priority Improvement - Y1 On Clock	Insufficient State Data - Y1 On Hold	Priority Improvement - Y2 On Clock	Priority Improvement - Y3 On Clock

State Accountability Identification Annual Cycle

Annually in August and September: Preliminary Ratings Released

**Preliminary Ratings Release**

CDE releases the preliminary District Performance Framework (DPF) reports for districts and School Performance Framework (SPF) plan type for schools. Districts with identified schools will be assigned a Support Lead. The support lead’s role is to provide guidance on identification, support planning, participate in monitoring and present to community members or the local board, see the section on Supports.

Annually in September or October: Accreditation Form / Request to Reconsider; Parent Notification & Local Board Hearing

**Accreditation Form / Request to Reconsider**

All districts must submit the Accreditation Form in the Accreditation Portal by September 26, 2025, to verify school and district ratings. If the district disagrees with a preliminary school or district rating, then the district may use this form to initiate a [request to reconsider](#) based on conditions that meet department criteria. Final request materials are due in the portal by October 15, 2025; otherwise, the preliminary state results will be considered final. For more details, see [2025 Accreditation and Request to Reconsider Guidance](#).

**Parent Notification & Local Board Hearing**

For each school with a plan type of Priority Improvement or Turnaround, the district must notify the families in the school of the plan type, the reason for identification, ways to provide input into the school’s plans (e.g., School Accountability Committee meeting) and notification of the local board’s hearing prior to adopting the school’s plan. Schools will use UIP assurances to demonstrate compliance. For more details, see the [Parent Notification fact sheet](#).



Annually in October or January: Unified Improvement Plans Due

### Improvement Plan Expectations for Sites on Performance Watch

Schools and districts on Performance Watch create a [Unified Improvement Plan \(UIP\)](#) that demonstrates an understanding of the magnitude of the issues facing them. [Appendix B](#) outlines specific requirements associated with state identification status. For additional information, visit [CDE's Unified Improvement Plan](#) webpage.

### Submission of Unified Improvement Plans

Unified Improvement Plans for all schools, districts and the institute are due on October 15 in the ACI Online System for public reporting and review.

Date	Description
April 15	Current year planning templates are made available in the UIP Online System.
October 15	Primary submission deadline for Unified Improvement Plans for public posting and review.
January 15	Secondary, optional submission deadline for newly identified sites and sites participating in the Request to Reconsider process.

### Optional January Submission

To provide additional time to integrate new requirements, an optional, later deadline of January 15 is available for schools, districts and the Institute that meet the following criteria:

- 1) Newly identified as Priority Improvement or Turnaround based on the School/District Performance Frameworks,
- 2) Newly identified as Comprehensive support based on federal ESSA identifications, or
- 3) Participating in the [Request to Reconsider process](#).

If a district or the Institute would like to leverage the secondary deadline, this flexibility can be marked on the School Accreditation form in the ACI Online System (see the [Accreditation Guidance](#)).

### Department Review of Unified Improvement Plans

Schools and districts on Performance Watch participate in a formal review and feedback process managed by CDE. There are options for the format of the review, either a document review or consultation with CDE staff. Customized directions for each school and district are [available on the first page of the UIP](#).

Annually in November or December: District Accreditation Contracts

The Department annually accredits all districts and does so through an accreditation contract between the state and the district, as described in the [District Accountability Handbook](#). A district that is "Accredited with Improvement Plan," "Accredited with Priority Improvement Plan," "Accredited with Turnaround Plan," or "Accredited with Insufficient State Data" will have its contract annually reviewed





by December 31st. To view the latest district accreditation contracts for each district, see the [District Accreditation Portal](#).

**Assurances:** Districts that are assigned a Priority Improvement or Turnaround Plan for factors other than academic performance outcomes (e.g., low participation on state assessments, failure to comply with school safety requirements) must provide assurances that they are in substantial good-faith compliance with (1) the budgeting, accounting, and reporting requirements set forth in Articles 44 and 45 of Title 22, (2) the provisions of section 22-32-109.1, C.R.S., concerning school safety, and the Gun Free School Act, 20 U.S.C. 7151, and (3) all other statutory and regulatory requirements that apply to the district. For purposes of monitoring a district's compliance with its accreditation contract, the Department may require information or conduct site visits, as needed.

**Noncompliance:** If the Department has reason to believe that a district is not in substantial compliance with one or more of the statutory or regulatory requirements applicable to districts, it will notify the local school board and the board will have 90 days after the date of the notice to come into compliance. If, at the end of the 90-day period, the Department finds that the district is not substantially in compliance with the application requirements, meaning that the district has not yet taken the necessary measures to ensure that it will meet all legal requirements as soon as practicable, the district may be subject to loss of accreditation and to the interventions (see section 22-11-209, C.R.S.).

### [Additional State Identification Requirements](#)

#### [Year 3 of the Accountability Clock](#)

This section outlines expectations for a school, district, or Institute that is in Year 3 of the Accountability Clock.

#### **Parent and Community Meeting**

State law requires Year 3 schools and districts to host a parent and community meeting to provide information and receive input on the school's accountability rating and next steps to improve. CDE may assist in planning, present information at the meeting, provide informational resources (e.g., slides, handouts), or facilitate the meeting. Find more information in the [Year 3 Community Meeting Supplement](#).

#### **Assigned a Transformation Specialist**

A CDE contact, referred to as a Transformation Specialist, will be assigned to any school or district Year 3 or above on the Accountability Clock. The Transformation Specialist's role is to support teams in school and district improvement efforts, preparing pathway plans, presenting at a state board hearing, and subsequent progress monitoring. Soon after preliminary ratings are released, the assigned contact will reach out to provide information and may schedule school visits to learn more about the school, its leadership and staff, and its unique context. Transformation Specialists are also available to support planning, school improvement strategy, and present to the local board, see the section on [Support](#).

#### **Optional: Early Action**

Schools in Year 3 and 4 may opt for Early Action with the State Board of Education. To use this option, schools and districts must select an improvement pathway to propose to the state board at a hearing in



Year 3 or 4. The board may approve or deny the request, but may not select an alternative pathway. Find more information in the [Early Action Supplement](#). Note that this option entails a [State Review Panel](#) visit (described in the [next section](#)).

Year 4 of the Accountability Clock: Preparing for the End of the Accountability Clock

This section outlines the steps that will take place as a school, district, or Institute is in Year 4 and is nearing the end of the accountability clock (i.e., Year 5+).

### Identify and Communicate a Pathway Preference

The Colorado's Education Accountability Act requires that the state board recommend specific action or an "Accountability Pathway" for any school, district or Institute remaining on a Priority Improvement or Turnaround plan for five years. In considering appropriate actions, the state board must consider recommendations from the [State Review Panel](#) (described below). School districts may also provide a proposal for their preferred pathway to the state board. Typically during Year 4, Transformation Specialists will work with the district or Institute to discuss pathways that would be best suited to create dramatic change targeting the root causes of identified performance challenges. [Table 1](#) describes each of the accountability pathways at a high level. CDE has developed guidance documents and rubrics, included below, for each Accountability Pathway to support districts in selecting and planning for a pathway best suited to their needs. Note that with the passage of H.B. 25-1278, some of the pathway requirements and options are shifting. CDE will work with the State Board during the 2025-26 school year to update rules and procedures regarding these shifts. Sites with state board directed action or possibly coming before the state board for a hearing should work with their assigned Transformation Specialist to understand the changes for 2025-26.

#### Pathway Guidance Documents

Guidance documents overview important information about each pathway, including rationale for selecting that pathway, governance implications, and funding considerations.

- [Conversion to a Charter School](#)
- [Innovation School or Innovation Zone](#)
- [Management by a Public or Private Entity](#)
- [School Closure](#)
- [Community School Conversion](#)
- [District Reorganization](#)

#### Pathway Rubrics

Rubrics are intended to guide planning for schools who have chosen a pathway and are in the process of developing a pathway plan.

- [Innovation School or Innovation Zone Plan Rubric](#)
- [Management Plan Rubric](#)
- [Charter Conversion Rubric](#)
- [School Closure Rubric](#)
- [Community School Conversion Rubric](#)



**Table 1. Type of Accountability Pathways for Districts and Schools**

Pathway	Districts (C.R.S. 22-11-209)	Schools (C.R.S. 22-11-210)	What does this mean?
District Reorganization	That the school district be reorganized pursuant to article 30 of this title, which reorganization may include consolidation	n/a	A committee develops a plan to consolidate the district with a neighboring district(s) and/or alter its boundaries. This involves comprehensive negotiation and requires either approval from voters in affected school districts, or approval from affected local boards of education (depending on which reorganization process is chosen by the state board) that voters in all involved districts support the plan.
Change in Management	That a private or public entity, with the agreement of the school district, take over management of the school district or management of one or more of the district public schools	With regard to a district public school that is not a charter school, that the district public school should be managed by a private or public entity other than the school district  With regard to a district or Institute charter school, that the public or private entity operating the charter school or the governing board of the charter school should be replaced by a different public or private entity or governing board	An external organization is brought into the district or school to manage the entire school/district or to manage targeted operations (e.g., fiscal management, HR operations, or instructional approach). The external partner must have contractual authority and accountability.
Charter School Conversion	That one or more of the district public schools be converted to a charter school	With regard to a district public school, that the district public school be converted to a charter school if it is not already authorized as a charter school	A school(s) is converted to a public charter school. This means that the school has its own governing board. A management organization could be brought in to operate the school(s). There are automatic waivers available to charter schools.
Innovation Status	That one or more of the district public schools be granted status as an innovation school pursuant to section 22-32.5-104 or that the local school board recognize a group of district public schools as an innovation school zone pursuant to section 22-32.5-104	With regard to a district public school, that the district public school be granted status as an innovation school pursuant to section 22-32.5-104	Innovation Status provides a way for a school, a group of schools or the district to develop innovative practices to better meet the needs of students. It allows more autonomy to make decisions at the school-level and includes getting approval on waivers from local and state policies that may be barriers to that innovative vision.
School Closure	That one or more of the district public schools be closed	That the public school be closed or, with regard to a district charter school or an institute charter school, that the public school's charter be revoked	School closure can be done in different ways, including full closure (permanent closure), partial closure (school no longer serves a grade span, such as the high school at a K-12 school) or a phase out (school is slowly closed over time as students naturally exit the system).



Pathway	Districts (C.R.S. 22-11-209)	Schools (C.R.S. 22-11-210)	What does this mean?
Community School Conversion	That one or more district public schools be converted to a community school as defined in section 22-32.5-103(1.5)	With regard to a district public schools, that the district public school be converted to a community school as defined in section 22-32.5.103(1.5)	The district converts a school to a community school, which is a public school that implements (1) an annual asset and needs assessment that engages at least seventy-five percent of families, students, and educators in the community, (2) a strategic plan, (3) a process to engage partners who bring assets and expertise to implement the school's goals, and (4) a community school coordinator.
Removal of Accreditation	That the school district's accreditation be removed	N/A	The district is considered Unaccredited.
Charter Revocation	N/A	(V) That the public school be closed or, with regard to a district charter school or an institute charter school, that the public school's charter be revoked. (C.R.S. 22-11-210)	Charter school closure can be done in different ways, including full closure (permanent closure), partial closure (school no longer serves a grade span, such as the high school at a K-12 school) or a phase out (school is slowly closed over time as students naturally exit the system). In addition, the charter school may have their charter revoked.
Replace the operator	N/A	(II) With regard to a district or institute charter school, that the public or private entity operating the charter school or the governing board of the charter school should be replaced by a different public or private entity or governing board. (C.R.S. 22-11-210)	The public or private entity operating the charter school could be replaced.
Replace the governing board	N/A	(II) With regard to a district or institute charter school, that the public or private entity operating the charter school or the governing board of the charter school should be replaced by a different public or private entity or governing board. (C.R.S. 22-11-210)	The governing board of the charter school could be replaced.

### Visit from the State Review Panel

Created through the Education Accountability Act, the [State Review Panel](#) (SRP) is a body of educational experts assigned to critically evaluate schools and districts at the end of the Accountability Clock (i.e., earned Priority Improvement or Turnaround plan type for five years) to engage in dramatic change and provide recommendations to the Commissioner of Education and State Board of Education as to which pathway(s) it believes will produce that change. The Commissioner appoints panelists who have expertise in school and district leadership, curriculum, assessment, instructional data management,



program evaluation, teacher leadership, and school and district governance. Special attention has been paid to geographic representation and specialized knowledge (e.g., online programs, charter schools, disaggregated groups of students such as multilingual learners). An outside partner, SchoolWorks, has been hired through a competitive process to coordinate the Panel's work. This ensures that the Panel is independent of the department in their recommendation-making process.

### Primary Responsibilities of the SRP

The SRP is tasked with:

- Providing a critical evaluation of the Unified Improvement Plan (UIP), including capacity of school/district to engage in dramatic change.
- Providing recommendations to the Commissioner and State Board of Education on potential actions when a school or district remains on Performance Watch for five consecutive years, or earlier upon request.

Panelists are expected to answer questions about the school's or district's leadership capacity to implement the needed change for rapid improvement, including:

- Whether the district's/school's leadership is adequate to implement change to improve results;
- Whether the district's/school's infrastructure is adequate to support school improvement;
- The readiness and apparent capacity of the district/school personnel to plan effectively and lead the implementation of appropriate actions to improve student academic performance;
- The readiness and apparent capacity of the district/school personnel to engage productively with and benefit from the assistance provided by an external partner;
- The likelihood of positive returns on state investments of assistance and support to improve the district's/school's performance within the current management structure and staffing; and
- The necessity that the district or school remain in operation to serve students.

### Document Reviews and Site Visits

The SRP's evaluation occurs through document reviews (including an evaluation of the UIP) and site visits (including classroom observations and focus groups with district and school leadership, local board members, staff, families and local community members). The Panel engages in four types of site visits:

- 1) **Initial Visit – Early Action:** for a site in Year 3 or 4 if requested by the district for an early action board hearing where the SRP recommendation report may only consider the pathway(s) proposed by the district;
- 2) **Initial Visit – End of Clock:** when the site anticipates advancing to Year 5, typically in spring of Year 4 (or sooner when a site opts for early action);
- 3) **Progress Monitoring – Board Ordered:** in preparation for a rehearing for a site with a State Board order is in effect and the site has not yet exited the clock after two years of implementation; and
- 4) **Optional SRP Visit:** that is primarily intended to provide helpful information to inform improvement efforts at the school and/or district level for a site in Year 3 of the clock if the department has additional funds available.



Based upon the SRP’s document review and site visit, a report is shared with districts and the Commissioner after all three types of visits. The Panel provides recommendations to the Commissioner and State Board of Education to consider as they determine the required action(s) at the end of the clock or early action. For sites with an existing state board order, the Panel also provides a report to the Commissioner and state board on whether the site is in compliance with the state board order; if not in compliance, the Panel may provide other recommendations from the available pathway options.

### **Optional: Identify a Pathway Planning Team**

Planning teams typically include representation from school and district leadership and may include a potential point-person for the Pathways Planning grant. This could be the same as the UIP planning team. Many districts and schools use the pathways planning grant to hire a planning facilitator to support the planning process.

### **Optional: Convene Stakeholders**

While regular and frequent stakeholder engagement is encouraged, CDE recommends additional stakeholder engagement as the school and district collaboratively select a pathway and prepare a proposal for the state board. One pathway option, Innovation status for the school or a district zone, requires staff approval. Another pathway option, conversion to a community school, requires specific, robust stakeholder engagement of the community.

### **Year 5: End of the Accountability Clock**

This section outlines the steps that will take place as a school, district or Institute reaches the end of the accountability clock (i.e., Year 5). The state’s accountability clock requires the State Board of Education to direct a course of action to the local board of education if the school or district has received Priority Improvement or Turnaround ratings for five consecutive years. As described in the [above section](#), these courses of action are called “Accountability Pathways” and are directed by the state board during an Accountability Hearing.

### **State Board of Education Accountability Hearings**

When deciding a course of action for a school or district that has received five consecutive ratings of Priority Improvement or Turnaround, the state board holds an Accountability Hearing. The State Board of Education can direct different accountability pathways (described in the [section above](#)) based on whether the chronically low-performing site is a district, a district-run public school, or a charter school. For more information, go to the [Accountability Pathways and Hearings fact sheet](#). Once a hearing has been scheduled, the state board acts in a quasi-judicial role, meaning the board cannot be lobbied or communicated with by the school, district, or other advocates. The state board must make their determination by considering only the following during an Accountability Hearing:

- **Commissioner and Department Report:** the Commissioner and CDE staff provide relevant academic data, prior improvement efforts, and other information as requested by the state board in the form of a submitted report.
- **State Review Panel Recommendation:** prior to the hearing, the State Review Panel will issue a written recommendation regarding which Accountability Pathway can best improve student outcomes.



- **District Proposal:** CDE staff will work with the district to select a pathway that is best suited to create dramatic change at the school or district.
- **Public Comment:** the State Board Office collects comments, feedback, and testimony submitted in advance of the hearing by parents, community members, local officials, and others.

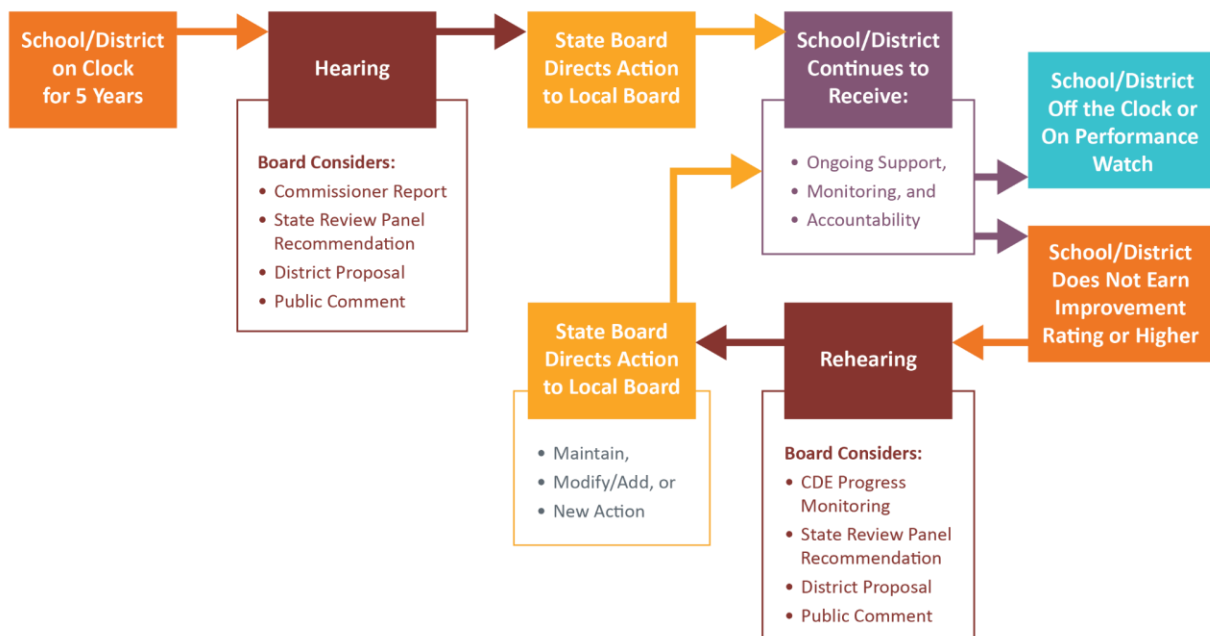
For a list of active state board orders, go to the [State Board Accountability Hearings website](#).

Year 6+: Additional Monitoring Requirements

If the school or district continues to receive Priority Improvement or Turnaround ratings after implementing their state board directed-pathway, the state board may in any year — and must every two years — hold an additional Accountability Hearing and direct the district to continue the previously directed action or undertake additional or different actions.

If the school or district receives two consecutive ratings of Improvement or Performance, then the school or district is no longer required to implement the state board directed-pathway and is considered off of the Accountability Clock. The Accountability Hearing process is outlined in the figure below.

Figure. Accountability Hearing Process







## Identification Process for Federal Accountability

States must have a method for identifying schools for Comprehensive (CS), Targeted (TS), and Additional Targeted (ATS) support and improvement based on these indicators and establish long-term goals and measures of interim progress for academic achievement, graduation rates, and progress toward English proficiency. States are also required to identify schools for these categories based on the academic achievement scores being adjusted for non-participants. Therefore, it is possible for a school to be identified for CS or TS, due to participation only. It's also possible for a school to be identified for CS or TS and not on the Accountability Clock through its SPF, or vice versa.

### Federal Identification Types

#### Comprehensive Support and Improvement School Identification

Three CS school categories are identified annually based on the following criteria:

- **Lowest Performing 5% of Title I Schools.** All Title I schools are ranked on a summative index score (total percentage points earned) based on all five ESSA indicators, using aggregated data from the three preceding years. Title I schools performing in the lowest 5% are identified for improvement. One Alternative Education Campus (AEC) will be identified in this category, reflecting the relative percent (5%) of Title I schools that are AECs. If the summative index score does not adequately differentiate the lowest-performing AEC, attendance and truancy data will be included for identification purposes.
- **Low Graduation Rates.** Colorado identifies all public high schools with 4-year and 7-year graduation rates that are below 67% for three consecutive years for improvement. If the 7-year graduation rate is not available, then only the 4-year graduation rate is used (or vice versa).
- **Additional Targeted.** Title I schools previously identified for Additional Targeted Support and Improvement (ATS, see below) that have continued to be low performing for the same disaggregated group(s) for three consecutive<sup>6</sup> years after identification will be moved to this category in their fourth year of identification.

Schools identified as CS will remain in that category for three years, regardless of higher performance, to ensure adequate time to implement improvement strategies and sustain performance before supports are reduced or terminated. Schools that no longer meet identification criteria from the year they were identified will exit CS after the third year. However, a school will not exit CS if it is re-identified as CS while implementing improvement strategies (in years two and three after original identification). For example, a school in the lowest 5% that improves in its second year but then falls back into the lowest 5% in its third year will retain CS identification.

#### Targeted Support and Improvement School Identification

TS schools are identified annually, with a subset meeting criterion for Additional Targeted Support and Improvement.





**Targeted Support and Improvement (TS).** Any school with at least one consistently underperforming disaggregated group (i.e., students receiving free and reduced meals, students from major racial and ethnic groups, students with disabilities, and multilingual learners). Colorado uses all ESSA indicators, based on three years of aggregate data, to evaluate the performance of all disaggregated groups. Additionally, progress toward English proficiency is used as an indicator to evaluate the performance of multilingual learners. Schools are identified, separately for each grade span (elementary, middle, high) if they have at least three indicators for a given student group(s) and earned the lowest rating (does not meet expectations) on all available indicators for that group(s).

Districts are responsible for determining how long a school will remain TS, what criteria will be required to exit TS status, and take district-determined action if the school does not meet the exit criteria within the district-determined timeline.

**Additional Targeted Support and Improvement (ATS).** Colorado identifies any TS schools with at least one disaggregated group that, on its own, meets the criteria for the lowest 5% of Title I schools as ATS. Schools that have enough students in a disaggregated group to earn a rating on *all* sub-indicators, for all grade-spans served by that school (elementary, middle, high), and have a summative index score (total percentage points earned for the disaggregated group) below the cut score used for Comprehensive Support and Improvement - Lowest Performing 5%, are identified as ATS.

Any Title I schools that are identified as ATS for three consecutive years for the same student group(s) will move to CS in their fourth year of identification.

### Federal Accountability Identification Annual Cycle

#### Annually in September: ESSA Identifications Released

CDE releases ESSA Identifications of Comprehensive Support (CS), Targeted Support (TS) and Additional Targeted Support (A-TS) reports to districts via Syncplicity about one week after state Performance Frameworks are released. Information will also be shared on which schools remain in CS: On Watch. Districts with identified schools will be assigned a [Support Lead](#). The support lead's role is to provide guidance on identification, support planning, participate in monitoring and present to community members or the local board, see the section on [Supports](#).

Federal identification is not eligible for a rating revision request, but questions about identification can be directed to the [Federal Programs team](#).

#### Annually in October or January: Unified Improvement Plan Due

### Unified Improvement Plan Expectations for Schools that are Identified under ESSA

ESSA requires that identified schools develop and implement an improvement plan that addresses the reasons for the school's identification and will result in improvement of student outcomes. Plan development, approval, and monitoring vary by identification categories. ESSA planning requirements are described in [Appendix C](#). The LEA determines what improvement plan templates to use for schools identified for TS or ATS. For additional information about the improvement planning requirements, visit



[CDE's ESSA Planning Requirements](#) webpage. See [ESSA Identification and Exit Criteria](#) for more information on the methodology used for identification.

### **Submission of Improvement Plans for ESSA-Identified Schools**

Unified Improvement Plans for all schools, districts and the institute are due on October 15 in the ACI Online System for public reporting and review. See [Appendix C](#) for a description of requirements based on federal identification status.

### **Optional January Submission for Eligible Sites**

To provide additional time to integrate new requirements, an optional, later deadline of January 15 is available for schools, districts and the Institute that meet the following criteria:

- 1) newly identified as Priority Improvement or Turnaround based on the School/District Performance Frameworks,
- 2) newly identified as Comprehensive support based on federal ESSA identifications, or
- 3) participating in the [Request to Reconsider process](#).

If a district or the Institute would like to leverage the secondary deadline, this flexibility can be marked on the School Accreditation form in the ACI Online System (see the [Accreditation Guidance](#)).

### **Department Review of Unified Improvement Plans for ESSA-Identified Schools**

Improvement plans from CS schools must be reviewed, approved, and periodically monitored by CDE. CS plans will not be reviewed by CDE during the first year of identification. CS schools newly identified in September of each year will have a planning year. CS plans will be reviewed by CDE in the second year. If schools continue to be identified as CS for the same reason, CDE re-reviews approved plans every three years. Improvement plans from TS and ATS schools must be reviewed, approved, and periodically monitored by the district or LEA.

### **Exiting Identification**

- Schools may exit this category after the third year, if they no longer meet the identification criteria for the year in which the school was identified and they not re-identified in the fourth year.
- CDE annually determines Targeted Support (TS) and Additional Targeted Support (ATS) identifications. Per ESSA, each LEA determines the exit criteria and documents the criteria in the Consolidated Application.

### **Additional Federal Requirements**

CS-Year 3+

ESSA requires that states take more rigorous action for any CS schools identified for more than three years. Identification status is available in the each schools' ESSA Profile or on the [Methods for Identification and Exit Criteria for ESSA Support and Improvement website](#). Identifications will be noted as "3 or more years". CDE [Regional Contacts](#) will consult with the district and school(s) to develop an



individualized plan for the more rigorous action based on the local context of each school. Examples of more rigorous action include UIP Consultation Support for school improvement planning, EASI Grants specifically for CS-Y3+ schools, and other additional support structures based on local need and context. CS-Y3+ convenings are held twice annually in order to connect CDE, LEA and school staff and determine the most supportive next steps for the school.



## State and Federal Identification: Supports for Dramatic Change

CDE offers a differentiated approach to support and intervention based on performance and need. This is carried out in two main ways: (1) Empowering Action for School Improvement (EASI) grant application and (2) School Quality & Support Contacts.

### Empowering Action for School Improvement (EASI Grants)

The various supports and school improvement grant opportunities offered through CDE are available in a single application. The Department focuses on a “needs-based approach” to award services and funding. This approach has been designed to: create fair and transparent processes; increase efficacy and efficiency; build district and school capacity for sustainable improvement; and maximize impact on student learning. Ultimately, the intent is to implement a robust process of matching schools’ needs with rigorous, evidence-based strategies and adequate resources.

The [EASI Application](#) is a one-stop shop for districts to apply for state and federal funds that are focused on school improvement strategies. Available supports range from funding for exploration of school improvement efforts (e.g., diagnostic review, stakeholder engagement, improvement planning) to supports led by CDE and/or external providers (e.g., School Turnaround Leadership Development, Turnaround Network, Connect for Success, and Accountability Pathways) to improvement efforts designed and led by districts. In addition, CDE publishes a [vetted list](#) of school and district improvement partners that are available to help districts and schools build their capacity to implement best practices and create sustainable performance.

The EASI process begins in September, and applications are typically due in December. District Support Leads can assist with this process. CDE will host office hours, 101 sessions, and service orientations to help district teams learn more about the application process and connect with CDE staff.

### School Quality & Support Contacts

Districts with a school on Performance Watch (i.e., Priority Improvement, Turnaround, On Watch, On Hold) or a school identified for Comprehensive Support and Improvement are assigned [School Quality and Supports contacts](#) (shared with districts in September), these include:

- **Support Leads:** Districts are assigned a support lead to act as a single point of contact and broker to other services. The support lead is available to assist with targeted support for identified schools (e.g., On Clock, Comprehensive Support), the Empowering Action for School Improvement (EASI) application, and to connect districts with other resources to support the district with improvement efforts, as appropriate.
- **Transformation Specialist:** When a district or school has been identified for three or more years, Support Leads transition to Transformation Specialists. Transformation Specialists provide more intensive engagement from the Department with more opportunities for schools and districts to receive support in their transformation efforts.
- **School Improvement Planning (SIP Team) Contact:** contacts provide universal support to



districts to assist with completing improvement planning requirements, engaging with the UIP template, understanding and interpreting accountability data, and leading continuous improvement efforts.

- **Elementary and Secondary Education Act (ESEA) Regional Contacts:** ESEA regional contacts provide targeted support to ensure that grant applications, application and program review protocols, and plan approval criteria reflect quality program standards, maximize efficiency, and improve program design and implementation in ways that optimize student outcomes.



Appendices

Appendix A: [Table of Performance Watch Status](#)

Description	Clock Year	Performance Watch Status	Summary of Requirements
Earned a Priority Improvement or Turnaround plan type	Year 1+	On Clock	<ul style="list-style-type: none"> <li>- General UIP requirements, plus additional planning requirements specific to accountability clock (e.g., parent engagement strategies, Turnaround strategy, Year 4 pathways planning)</li> <li>- Parent notification and public hearing (each year on clock)</li> <li>- Adoption of UIP by local board (each year on clock)</li> <li>- Oct 15 UIP submission for CDE review. Newly identified districts and schools may request an extension to Jan 16.</li> <li>- Eligible to exit performance watch the next school year if Performance or Improvement (Year 1 only).</li> <li>- Community meeting (Year 3)</li> <li>- Site visit with the State Review Panel (typically Year 4 and progress monitoring after directed action)</li> <li>- Hearing with State Board of Education (Year 5 and subsequent years determined by board)</li> </ul>
Earned an Improvement or Performance plan type after at least 2 years of being on performance watch	Year 2+	On Watch	<ul style="list-style-type: none"> <li>- General UIP requirements</li> <li>- Oct 15 UIP submission for CDE review. Biennial flexibility not available.</li> <li>- Adoption of UIP by principal for schools and superintendent or designee for districts. Local policy determines whether local board reviews or adopts plan.</li> </ul>
Received an Insufficient State Data plan type after being on performance watch	N/A	On Hold	<ul style="list-style-type: none"> <li>- General UIP requirements, plus additional planning requirements specific to accountability clock (e.g., parent engagement strategies, Turnaround strategy, Year 4 pathways planning)</li> <li>- Parent notification and public hearing (each year on clock)</li> <li>- Adoption of UIP by local board (each year on clock)</li> <li>- Oct 15 UIP submission for CDE review. State Review Panel will review in some years.</li> </ul>





## Appendix B: State Identification Additional Planning Requirements

The information below identifies additional plan content requirements based on state identifications. Requirements are pulled from the [Quality Criteria Rubric](#) and organized using the Quality Criteria Rubric’s Process or Element designations, icons, and language for “meets expectations.” As a note, all Colorado schools and districts must meet universal content requirements identified in the [Quality Criteria Rubric](#) indicated with the “ALL” icon.



### Improvement Plans

Sites identified as Improvement are not necessarily on Performance Watch unless they were previously identified as Priority Improvement or Turnaround and are currently “On Watch.” All schools and districts with Improvement identification are required to meet:



1. Universal requirements for ALL schools and districts, and
2. All Improvement Plan requirements from Improving Mathematics Outcomes in K-12 (House Bill 23-1231) (identified as Math Acceleration K-12 in the [Quality Criteria Rubric](#)).

UIP Element	How to Meet Additional Improvement Expectations
<i>Assurances</i>	<ul style="list-style-type: none"> <li>● Math Acceleration assessment performance data from at least the last two years has been analyzed. Data was disaggregated by grade level, performance levels, and student demographics.</li> </ul>
<i>Evidence &amp; Rationale for Prioritization:</i>	<ul style="list-style-type: none"> <li>● Describe performance patterns that led to prioritizing math. (If the data analysis does not support prioritizing math, then an explanation is included to document rationale for the school- or district-wide direction.)</li> </ul>
<i>Target Setting</i>	<ul style="list-style-type: none"> <li>● Set ambitious and attainable target(s) for reducing the number of students who are below grade level expectations or are struggling in math (Targets must be set for Math Acceleration K-12 even if math is not identified as a Student Performance Priority.)</li> </ul>
<i>Action Plan</i>	<ul style="list-style-type: none"> <li>● Include evidence-based Action Steps that can reasonably be expected to have a meaningful impact for students identified as being below grade level or struggling in math. (Action Steps must be set for Math Acceleration K-12 even if math is not identified as a Student Performance Priority.)</li> </ul>

### Priority Improvement Plans

Schools and districts with Priority Improvement identification are required to meet:







1. Universal requirements for ALL schools and districts,
2. All Improvement Plan requirements listed above, and
3. The additional Priority Improvement plan content requirements listed below.

UIP Element	How to Meet Additional Priority Improvement Expectations
Stakeholder Involvement	<ul style="list-style-type: none"> <li>● <a href="#">Family Notification</a> and Local Board Adoption</li> </ul>
Root Causes	<ul style="list-style-type: none"> <li>● <a href="#">Early Learning Needs Assessment</a> (schools serving K-3)</li> </ul>
Action Plan:	<ul style="list-style-type: none"> <li>● Actions promoting family engagement aligned with <a href="#">Family, School, and Community Partnerships</a> standards.</li> <li>● Next steps based on Early Learning Needs assessment findings (schools serving K-3)</li> </ul>

**Turnaround Plans**

Schools and districts with Turnaround identification are required to meet:



1. Universal requirements for ALL schools and districts,
2. All Improvement Plan requirements listed above,
3. All Priority Improvement Plan requirements listed above, and
4. The additional Turnaround plan content requirement listed below.

UIP Element	How to Meet Additional Turnaround Expectations
Major Improvement Strategy	<ul style="list-style-type: none"> <li>● Identify a state-required turnaround strategy and articulate an action plan aligned to needs identified in data analysis</li> </ul>

**On the Accountability Clock - Year 4**

In addition to universal requirements for ALL schools and districts, schools and districts in Year 4 of the state Accountability Clock have the specific plan content requirement listed below.



UIP Element	How to Meet Additional Turnaround Expectations
Major Improvement Strategy	<ul style="list-style-type: none"> <li>● Provide a description of the school and district’s exploration of all potential turnaround pathways, identifying the preferred pathway, providing an overview of other options considered, and a rationale for the selection of the preferred pathway.</li> </ul>



## Appendix C: ESSA Identification Additional Planning Requirements

Requirements for plan content, adoption, and monitoring vary by federal identification categories for sites that accept ESSA Title funds. Additional plan content requirements based on federal identifications are pulled from the [Quality Criteria Rubric](#) and organized using the Rubric’s UIP Process or Element designations, icons, and language for “meets expectations.” As a note, all Colorado schools and districts must meet universal content requirements identified in the [Quality Criteria Rubric](#) indicated with the “ALL” icon.

ALL

### Comprehensive Support (CS)

Schools accepting ESSA funds may be identified for Comprehensive Support (CS) if they fall into any of the three following categories: 1) the *lowest performing 5%* of Title I schools, 2) high schools with *low graduation rates*, or 3) *chronically low performing student group(s)*. More detail on how CS identifications are calculated by CDE is available in the [ESSA methods for identification and exit criteria](#).

CS

Colorado requires that schools identified for Comprehensive Support and Improvement use their Unified Improvement Plan to address ESSA planning requirements. In addition to the universal content requirements for ALL schools and districts, **Comprehensive Support (CS)** plans are required to meet the following additional UIP content requirements:

UIP Element	How to Meet Additional ESSA Comprehensive Support Expectations
Assurances	<ul style="list-style-type: none"> <li>● Current school and/or district performance was analyzed relative to local, state and federal metrics and expectations (e.g. SPF metrics, ESSA indicators).</li> <li>● The plan was developed in partnership with stakeholders, including school and district leaders, teachers, parents/families, and the School Accountability Committee (SAC) or District Accountability Committee (DAC).</li> <li>● The site will involve stakeholders—at a minimum, the School or District Accountability Committee—in progress monitoring the implementation of the plan throughout the school year.</li> <li>● Stakeholders involved in the development of the plan were made aware of reasons for ESSA identification and were active partners in reviewing performance on related indicators and providing input on strategies or interventions related to identification.</li> </ul>



UIP Element	How to Meet Additional ESSA Comprehensive Support Expectations
Student Performance Priorities	<ul style="list-style-type: none"> <li>Clearly and explicitly align at least one Student Performance Priority to <a href="#">reasons for ESSA identification</a>.</li> </ul>
Evidence & Rationale for Prioritization	<ul style="list-style-type: none"> <li>Describe how at least one target was selected because of the specific <a href="#">reason for ESSA identification</a>.</li> </ul>
Target Setting	<ul style="list-style-type: none"> <li>Set ambitious, attainable targets that align to the Student Performance Priorities (SPP).</li> </ul>
Interim Targets	<ul style="list-style-type: none"> <li>Interim Targets specify both a measure and specific metrics that are aligned to an Annual Target to assess the impact of the Major Improvement Strategies on student performance during the year.</li> <li>Specify expected student progress at least twice during the year.</li> </ul>
Root Causes	<ul style="list-style-type: none"> <li>Identify Resource Inequalities that contributed to the reason for ESSA identification.</li> </ul>
Major Improvement Strategies	<ul style="list-style-type: none"> <li>Identify a limited number of Major Improvement Strategies (ideally 2-4) that logically connect to the Root Causes identified in the plan. All root causes identified in the plan are addressed by at least one of the identified Major Improvement Strategies.</li> <li>Provide a clear rationale for the selection of Major Improvement Strategies, including the evidence-base for the strategy.</li> <li>Identify resources that will be used to support strategy implementation.</li> </ul>
Implementation Milestones	<ul style="list-style-type: none"> <li>Implementation Milestones for each Major Improvement Strategy name clearly observable or measurable indicators.</li> </ul>
Action Plan	<ul style="list-style-type: none"> <li>Include Action Steps dedicated to monitoring plan implementation and impact.</li> </ul>

Comprehensive Support plans must be approved (or adopted) at the school, Local Education Agency (LEA) or district, and CDE level. These plans should be documented within the school’s Unified Improvement Plan (UIP) and submitted to CDE through the Online UIP System. The timeline for CS plan submission follows the typical UIP submission process. CDE will use the



ESSA CS plan requirements embedded within the [Quality Criteria Rubric](#) to approve plans. Once plans are approved, CDE is federally required to monitor implementation of and periodically review CS plans.

**Targeted Support (TS) and Additional Targeted Support (A-TS)**

CDE identifies schools accepting ESSA funds as requiring support and improvement based on the performance and participation of specific group(s) of students including: English Learners, students with disabilities, economically disadvantaged students, and students in individual race/ethnicity categories. These schools are identified as *Targeted Support and Improvement (TS)* or *Additional Targeted Support and Improvement (ATS)*. More detail on how schools are identified for TS and ATS is available in the [ESSA methods for identification and exit criteria](#).

Following ESSA, Local Education Agencies (LEAs) determine what improvement plan templates to use for TS or ATS identified schools. While LEAs have the option to create their own document, Colorado’s UIP provides a convenient mechanism for capturing the specific ESSA requirements as it aligns well with required plan components. CDE’s [Quality Criteria Rubric](#) includes the ESSA requirements if LEAs choose to document TS and ATS plans within the UIP.

**Targeted Support (TS) sites must meet**



1. Universal content requirements for ALL schools and districts,
2. All of the assurances listed under Comprehensive Support (CS), and
3. These specific Targeted Support content requirements:

UIP Element	How to Meet Additional ESSA Targeted Support Expectations
Student Performance Priorities	<ul style="list-style-type: none"> <li>● Clearly and explicitly align at least one Student Performance Priority to <a href="#">reasons for ESSA identification</a>.</li> </ul>
Evidence & Rationale for Prioritization	<ul style="list-style-type: none"> <li>● Describe how at least one target was selected because of the specific reason for ESSA identification.</li> </ul>

**Additional Targeted Support (ATS) sites are required to meet:**

1. Universal requirements for ALL schools and districts,
2. All the assurances listed under Comprehensive Support (CS),
3. All Targeted Support (TS) requirements listed above, and
4. The additional Additional Targeted Support plan content requirement listed below.



UIP Element	How to Meet Additional ESSA Additional Targeted Support Expectations
<i>Root Causes</i>	<ul style="list-style-type: none"> <li>● Identify Resource Inequalities that contributed to the reason for ESSA identification.</li> </ul>
<i>Major Improvement Strategies</i>	<ul style="list-style-type: none"> <li>● Alignment to Root Causes: Identify a limited number of Major Improvement Strategies (ideally 2-4) that logically connect to the Root Causes identified in the plan. All root causes identified in the plan are addressed by at least one of the identified Major Improvement Strategies.</li> <li>● Identify resources that will be used to support strategy implementation.</li> </ul>
<i>Implementation Milestones</i>	<ul style="list-style-type: none"> <li>● Implementation Milestones for each Major Improvement Strategy name clearly observable or measurable indicators.</li> </ul>
<i>Action Plan</i>	<ul style="list-style-type: none"> <li>● Include Action Steps dedicated to monitoring plan implementation and impact.</li> </ul>

LEAs are responsible for approving and monitoring TS and ATS plans. The LEA determines the number of years a school can be identified for targeted support and improvement before taking additional action. LEAs are responsible for determining what that additional action should be.

**Title I Schoolwide Plan Flexibility**

CDE also provides schools participating in Title I, Part A Schoolwide programming with the option of using the UIP to satisfy [Title I Schoolwide requirements](#). Schools using the Title I Schoolwide Plan (TI-SW) option are required to meet universal requirements for ALL schools and districts and the additional plan process and content requirement listed below.

TI-SW

UIP Element	How to Meet Additional ESSA Title I Schoolwide Plan Expectations
Assurances	<ul style="list-style-type: none"> <li>● Analyze current school and/or district performance relative to federal metrics and expectations (ESSA indicators).</li> <li>● Plan serves as the Comprehensive Schoolwide Plan for schools participating in Title I, Part A Schoolwide programming.               <ul style="list-style-type: none"> <li>■ The plan includes a comprehensive needs assessment and instructional strategies that strengthen the academic program of the school, specifically addressing the needs of students at risk of</li> </ul> </li> </ul>



UIP Element	How to Meet Additional ESSA Title I Schoolwide Plan Expectations
	<p>not meeting Colorado Academic Standards and Colorado English Language Proficiency standards.</p> <ul style="list-style-type: none"> <li>■ The school will make the plan publicly available, monitor it regularly, and revise it as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging State academic standards.</li> <li>● Develop the plan in partnership with stakeholders, including school and district leaders, teachers, parents/families, and the School Accountability Committee (SAC) or District Accountability Committee (DAC).</li> <li>● Involve stakeholders—at a minimum, the School or District Accountability Committee—in progress monitoring the implementation of the plan throughout the school year.</li> </ul>
Student Performance Priorities	<ul style="list-style-type: none"> <li>● Identify a limited number of Student Performance Priorities (3 or fewer) of appropriate magnitude to focus the site’s improvement efforts.</li> <li>● Student Performance Priorities identify student performance metrics that are meaningfully related to indicators on the performance framework.</li> </ul>
Evidence & Rationale for Prioritization	<ul style="list-style-type: none"> <li>● Present compelling evidence that demonstrates the need to focus on the identified Student Performance Priorities.</li> <li>● Describe how the academic and/or behavioral needs of students at risk of not meeting Colorado Academic Standards and Colorado English Language Proficiency standards are prioritized.</li> </ul>
Major Improvement Strategies	<ul style="list-style-type: none"> <li>● Clearly and adequately describes strategies that, if implemented as described, have a likelihood of positively impacting results in the Student Performance Priorities.</li> <li>● Provide clear rationale for the selection of Major Improvement Strategies, including the evidence-base for the strategy. This may include an explanation of why the strategy is a good fit for the site’s context, existing assets, identified needs, student population, and staff capacity.</li> <li>● Describe Major Improvement Strategies that <ul style="list-style-type: none"> <li>■ Provide opportunities for <b>all</b> students to meet the challenging state academic standards.</li> </ul> </li> </ul>



UIP Element	How to Meet Additional ESSA Title I Schoolwide Plan Expectations
	<ul style="list-style-type: none"><li>■ Address the needs of students at risk of not meeting these standards.</li></ul>
Action Plan	<ul style="list-style-type: none"><li>● Include Action Steps dedicated to monitoring plan implementation and impact (i.e., meetings to reflect on Implementation Milestones and Interim Targets and to identify needed implementation adjustments).</li></ul>

Sites choosing to use the UIP as their Title I, Part A Schoolwide Plan must have their UIPs reviewed for these criteria at the school, LEA and state level. Schools must achieve “Meet Expectations” or “Partially Meet Expectations” on all criteria listed in the Quality Criteria Rubric in order for CDE to grant “Approval” for their plan.