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

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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 16 full Task Force meetings, 27 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—shares our learning along with ## recommendations. The recommendations, informed by evidence and rigorous analysis, are meant to preserve what is working but also 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 elected officials 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. Ultimately, this task force explored, listened, compromised, and developed recommendations—together. Because of their work, 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

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[1] Colorado General Assembly (2023).

1241 Task Force Chair and Vice Chair

Special Acknowledgment

The Task Force extends its deepest gratitude to Lisa Medler, Megan Richardson, April Thompson, and all the other Colorado Department of Education staff who responded to data requests, organized expert panels, provided technology and logistics support, and ensured the public had access to meetings and meeting content. Their critical contributions enabled the 1241 Task Force meetings to run smoothly and allowed the task force to focus on the content at hand.

B. Executive Summary

District and State Performance Frameworks	Assessments for Accountability	Public Reporting and Engagement	Continuous Improvement	Accreditation

Recommendations	
District and State Performance Frameworks	
1	Lower student count thresholds for accountability calculations and reporting
2	Combine student groups for ratings while disaggregating student groups for state reporting
3	Expand the student with disability group for calculating results
4	Explore best practices and monitor the accountability system to identify and reduce issues of volatility that impact schools and districts with small student populations
5	Move SAT reading/writing and math out of PWR indicator to achievement
6	Create "College and Career Readiness Before Graduation" sub-indicator to PWR
7	Rename the PWR matriculation rate indicator and thus expand it to be more inclusive of high-quality postsecondary options
8	Conduct a study to determine the possibility of including certain students as completers in the accountability frameworks
9	Re-evaluate weighting of frameworks to see if there should be an even greater emphasis on growth
Assessments for Accountability	
10	Develop assessments to assess content in languages other than English and Spanish
11	Improve the accommodations for students by dividing the CMAS into smaller sections

12	Clarify how schools can encourage or not discourage test participation
13	Change which students count for participation
14	Make the CMAS assessment adaptive
15	Improve the timeliness of assessment results
Public Reporting and Engagement	
16	Create one, coherent statewide dashboard that includes local and statewide data aligned with statewide instructional and PWR priorities
17	Enhance the user experience with reporting functionality and support that offers all stakeholders a comprehensive, accessible, and user-friendly way to utilize data
Continuous Improvement	
18	Provide guidance to local boards on monitoring the improvement planning process
19	Implement a system of early identification and intervention
20	Provide more support to schools starting in year 2
21	Support schools and districts pursuing bold solutions to turn around
22	Require more accountability for schools (and districts?) in year 4,5, and schools with insufficient data
23	Provide more professional learning according to school and district plans
24	Conduct an evaluation of external managers and CDE's management of the external management process
25	Require schools and districts to check in with CDE and with their peers regularly
26	Provide additional benefits for those receiving awards
27	Focus awards on state priorities and values
28	Conduct and share research on best practices in CO schools
29	Change the rules on how districts can receive a Distinction designation
Accreditation	
30	Do not publish results publicly until the request for reconsideration process is complete
31	Change the names of the plan types

II. Background

A. Task Force Charge, Membership, and Activities

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 see the full text of the statute, see Appendix XX.

There were 26 bipartisan, geographically diverse education stakeholders on the Task Force appointed by elected officials. The Task Force members represent the viewpoints of superintendents, principals, teachers, parents, students, advocates, school board members, and other education stakeholders 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 XX.

To conduct its work, the Task Force met 16 times as a whole group and 27 times in smaller study groups to consider individual elements of the accountability system. During its meetings, the Task Force considered essential components of the state's accountability system, past efforts to evaluate the system, and other educational priorities to develop its findings and recommendations. The Task Force also consulted with parent organizations, student organizations, and additional stakeholders. For a more detailed description of the task force's activities and its stakeholder consultations, see Appendix XX and XX, respectively. An overview of meeting structures and the cadence of the Task Force's work can be found in Appendix XX. A description of Task Force meetings objectives and agendas is in Appendix XX, and a summary of how the task force worked in its study groups and came to consensus on its recommendations is in Appendix XX.

B. Overview of Colorado's Education Accountability System

Colorado's Education Accountability System is primarily 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."[2] This design aligns 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] Similarly, Colorado state statute requires the State Board of Education to "Appraise and accredit public schools, school districts, and the State Charter School Institute."[4] CDE is the administrative arm of the State Board and is implementing the system responsible for holding districts and schools accountable for performance and

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[2] HumRRO (2022).
[3] EducationWeek (2016).
[4] HumRRO (2022).

providing support for improvement. Each year, the state issues district and school performance ratings using Performance Data as outlined in Table 1.

Colorado's Education Accountability System consists of the following elements:[5]

- **Performance Frameworks:** Performance frameworks provide a statewide evaluation of student performance using indicators based on academic achievement, academic growth, and postsecondary workforce readiness (PWR) data. Table 1 defines what each of the three framework indicators currently consists of, and Figure 1 shows what weight each indicator has on the performance frameworks at the elementary, middle, high school, and district levels.

Table 1: Performance Indicators Definitions

Performance Indicator	Performance Data Included
Academic Achievement	- Mean scale score on English language arts, math, and science assessments (CMAS, PSAT, CoAlt)[6] - Overall and for disaggregated student groups[7]
Academic Growth	- Median student growth percentile on English language arts and math (CMAS, PSAT, SAT) and English language proficiency assessments (WIDA ACCESS) - English language proficiency on track metric (WIDA ACCESS) - Overall and for disaggregated student groups
Postsecondary and Workforce Readiness (PWR)	- Reading & Writing and Math (SAT) - Graduation rate - Dropout rate - Matriculation rate (includes military enlistment and industry credentials, in addition to postsecondary enrollment) - Overall and for disaggregated student groups (except for matriculation rate)

Figure 1: Performance Indicators Weight Distributions

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[5] [Colorado Department of Education](#) (2023).

[6] The Colorado Alternate (CoAlt) Assessment is used to measure academic achievement for a very small number of students with the most significant cognitive disabilities. CoAlt is based on the Extended Evidence Outcomes of the Colorado Academic Standards.

[7] The disaggregated student groups are Free/Reduced-Price Lunch Eligible, Minority Students, Multilingual Learners, and Students with Disabilities. Previously identified for READ Plan is included for elementary CMAS-ELA academic achievement only.

Elementary and Middle Schools　　　　　　　*High Schools and Districts*
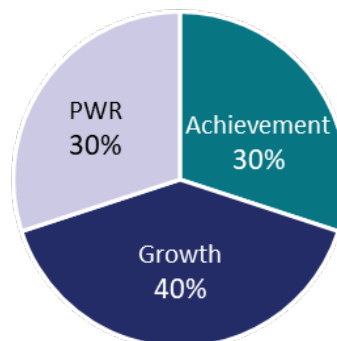
CDE uses the points earned through the performance frameworks to assign performance ratings to schools and districts. Schools receive one of four ratings called plan types, and districts receive one of five accreditation ratings. Both schools and districts can also receive an "Insufficient State Data" (ISD) rating. Table 2 outlines the different plan types for schools and districts.

Table 2: School and District Plan Types

	Distinction
Performance	Accredited
Improvement	Improvement
Priority Improvement	Priority Improvement
Turnaround	Turnaround
Insufficient Data	Insufficient Data

It is important to note that academic achievement and growth ratings are only based on data from students who took the assessments, and a number of schools and districts have significantly lower participation rates.This means that part of the inputs for school and district performance ratings may only be based on a low percentage of students in that school or district. See Appendix XX for more information on how assessment participation rates impact performance frameworks.

- **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, the [District and School Dashboard](#) provide data visualizations on enrollment, demographics, achievement, growth, and PWR over time.
- **Improvement Planning:** Building on a continuous improvement approach to meet multiple state, federal, and grant improvement planning requirements, schools and districts receive support on performance management. 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. The state also convenes multiple advisory groups (e.g., Technical Advisory Panel, Statewide Advisory Council on Parent Involvement in Education, CDE Accountability Work Group) to receive ongoing feedback on ways to strengthen and improve the implementation of the accountability system.
- **Supports and Interventions:** The state offers support and resources through a statewide tiered system of supports. All schools and districts can access universal supports (e.g., resources, trainings). However, schools and districts that are on or are approaching the accountability clock, meaning they are not meeting expectations on the performance frameworks, have access to much more intensive supports. These supports are matched to meet local needs, which can include CDE staff support and eligibility to apply to the Empowering Action for School Improvement (EASI) grant. The state's needs assessments drive the state system of supports. Supports are voluntary, but encouraged. If a site remains on the accountability clock for five years though, the State Board of Education is compelled to intervene by ordering the local board to take action with the identified site (e.g., external management, innovation status, school closure).
- **Accreditation:** The State Board of Education is responsible for the annual [accreditation](#) of districts based on performance frameworks and other provisions. Currently, the state has focused on provisions related to budget and financial policies and procedures, accounting and financial reporting, and school safety and the Gun Free Schools Act. The state board also assigns plan types to each school, but ultimately, local boards of education, the Charter School Institute Board, and BOCES Boards have the authority to accredit schools.
- **Awards:** Schools and districts can receive state [awards](#) for meeting certain criteria, such as academic achievement or growth scores. Some awards highlight exceptional progress with select student groups (e.g., multilingual learners, FRL).

III.   Academic Opportunities or Inequities

This report offers recommendations to improve the accountability system in a way that advances academic opportunities and addresses inequities, however, **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 likely impact academic proficiency 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 resource inequities that show up 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 students, including English Language Learners (ELLs), those with an Individualized Education Program (IEP), and students who are below grade level.	- A school community was unable to hire a math teacher for multiple years because of fiscal and geographic limitations, which led to extensive use of online education - Some schools and districts have trouble hiring a special education teacher or speech language pathologist to provide services either in person and/or virtually - Shortage of special education teachers and culturally and linguistically diverse teachers means many schools and districts go without these staff and do not meet service minutes - Rural areas have trouble attracting and retaining high-quality, certified teachers; pay scales cannot keep up with the cost of living - The pandemic had a significant impact on schools' and districts' workforce
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 - There is no transparency around what high-quality instructional materials or curriculum districts use - Before and after school child care, e.g., Boys and Girls Clubs, can provide additional opportunities to catch students up on material; however, there is unequal access to these programs - Some districts have funds for teachers to create curriculum outside of the school year; many don't, which leads to stale and ineffective curriculum

Funding: Provides adequate access to resources and helps meet priorities; includes grants, state and federal funding, donations and fundraising, and community or private partnerships.	- In areas with lower home values and limited commercial enterprises, funding from local property taxes is lower and the state share is higher - Some districts have grant writers to gain more personnel or support; in other districts, the grant writer is the principal or bus driver
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 - Bills from the legislature are not always in tune with district priorities - There is inequitable access to resources that support good governance and an understanding of the key issues facing decision-makers - Colorado is a diverse state and policies and incentives that work best in large, urban districts are not always suitable for smaller, rural districts
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 - Small districts, including many charter schools, do not benefit from economies of scale
Family and Community Supports: Schools have access to external assets, including strong culture, community school models, out of school time supports, parent/family engagement, and support from postsecondary and business sectors.	- Schools may not have the vehicles set up to fully communicate and engage with families who speak languages besides English - Schools may not have sufficient tools in place to provide equity in access for engagement, i.e. reaching families who do not have internet access - There is a high level of chronic absenteeism across the state; some reasons include transportation challenges, COVID transmission, and lack of effective messaging about importance of regular school attendance

As noted previously, the task force acknowledges that these resource inequities cannot be solved solely by changes to the state's accountability system. **The goal for this task force, however, is to strengthen a system that could allow schools and districts that are navigating systemic challenges and resource inequities to earn a rating that reflects the outcomes they are producing that is independent of the demographics of students they serve.**

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. 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,
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District and School Performance Frameworks

To advance equity in education, Colorado's accountability system should strive 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.

FINDING	**Issues with existing student count thresholds**
	See Recommendation 1 for solutions

Current thresholds used to report results contribute to data suppression, impacting the calculation of ratings and public reporting.

The public needs a full picture of how all students perform, including students from historically underserved groups and students in small schools or districts. Full transparency, however, must take into account federal and Colorado laws of protecting student privacy, such as to protect in cases where it could be easy to connect a school's results with the scores of individual students. The accountability system has rules set by CDE policy to fully 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.

Federal law requires States to ensure that public reporting does not reveal students' personally identifiable information (PII). States are left to determine their public reporting thresholds. There is some variability in the thresholds that states have adopted, including some states use lower thresholds (e.g., Alaska uses 5) or higher thresholds for state reporting (e.g., Texas uses 25).[8] *To learn more about how minimum thresholds were set by CDE for the Colorado Growth Model, read here*.

In Colorado, the thresholds for determining whether to report publicly on a student group's results are:
- At least 16 students must have state data for academic achievement and Postsecondary Workforce Readiness-related measures (e.g., graduation rate and dropout)
- At least 20 students must have state growth data for academic growth

The guidelines for public reporting of data and the thresholds established for accountability purposes, while similar, are not identical. For example, prior to 2022-23, graduation rates were reported with no data suppression rules while only schools and districts with more than 16 graduating students had graduation rate data reported for accountability purposes. Other public reporting that is not also used in the accountability system utilize different guidelines for public reporting. For example, pupil membership data reporting includes student groups with more than three students. It is important to note that data reporting thresholds for accountability purposes are not only to protect students' personally identifiable information, but also to ensure stability and reliability in the metric.

These rules can also affect accountability results. First, when thresholds on the number of students of a particular group are not met, CDE aggregates and publicly reports data of that student group over a three-year period. Second, when the number of students in a particular group falls below CDE's threshold, CDE will generate multi-year frameworks for those school systems.. An unintended consequence of the current thresholds is that data may be hidden. The three-year aggregation is an attempt to address this, but there are still schools without data as well as   certain student groups and/or school results that could be hidden behind the overall performance of a school and/or district.

In addition, if a student group only meets CDE minimum thresholds, this group will still account for the same amount of points in the performance frameworks as another group that is many times larger. 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.

When schools do not have reportable data for any performance indicators, the school system is assigned Insufficient State Data (ISD) ratings. An ISD plan type is automatically assigned if the total participation

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[8] Alliance for Excellent Education. 2018.

rate is at or below 25% for English language arts/reading and writing, and math. An ISD plan 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 any of the performance indicators. 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 the process.[9]

In 2024, using preliminary frameworks, 24 districts were assigned an ISD rating which is lower than the final ratings in 2023 (32); however it is still higher than 2019 (pre-pandemic). It should be noted that at the time of publication, the 2024 data are still preliminary and the number of ISD rated-districts will likely decrease when frameworks are finalized in December 2024.[10]

Table #: Preliminary District Ratings Trends Over Time (2019-2024)

More District Ratings Have Improved Since Last Year
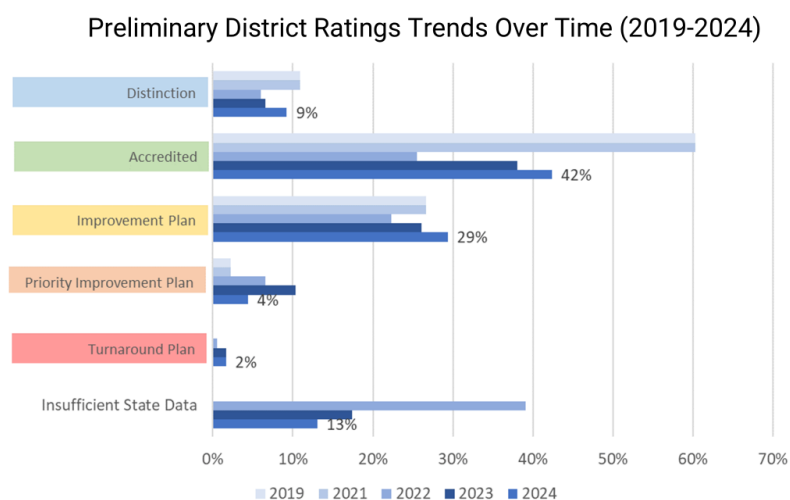
Summary: Slight decrease in ISD ratings compared to 2023. More districts at Improvement or higher than in 2023, but not as high as 2019. Lower % on clock than 2023.

Preliminary District Ratings Trends Over Time (2019-2024)

NOTE: Includes preliminary ratings for 2023 and 2024 and final ratings for earlier historical data. Frameworks were not calculated in 2020 and 2021; ratings were rolled over from 2019.

Source: Colorado Department of Education. 2024.

Table #: Preliminary School Ratings Trends Over Time (2019-2024)

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[9] Colorado Department of Education (2024).
[10] Colorado Department of Education (2024).

More School Plan Types Have Improved Since Last Year

Summary: Similar trends as with districts. Decrease in ISD meant more schools earned plan types. Greater % earned Improvement or higher than in 2023 but not quite as high as 2019. Fewer schools on accountability clock compared to 2023.

NOTE: Includes preliminary ratings for 2023 and 2024 (excludes AECs) and final ratings for earlier historical data. Frameworks were not calculated in 2020 and 2021; ratings were rolled over from 2019.
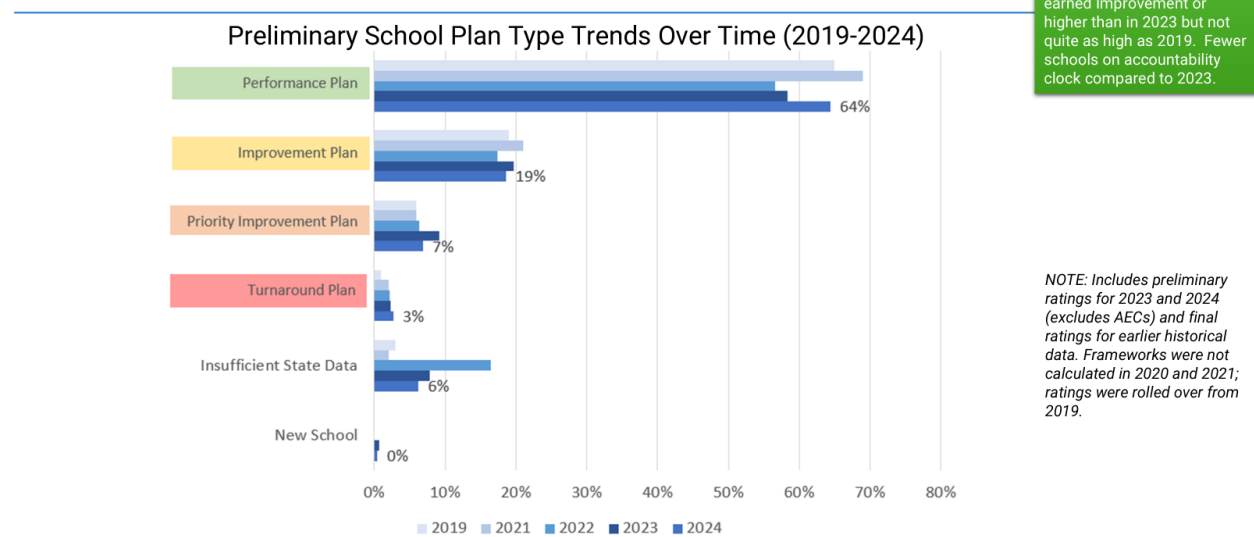
Source: Colorado Department of Education. 2024.

In 2019, no district and 25 schools were assigned an ISD rating. One district was eligible to choose its rating in 2019 because even with three years of data, it still did not have enough data to report publicly. **PLACEHOLDER: CDE will provide the below data - where possible - by early November:**
- 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?

FINDING	*Weighting student performance across multiple group categories*
	See Recommendation 2 for solutions

Under the current system, certain students are counted multiple times across different disaggregated student group categories within indicators. This contributes to ratings of schools and districts serving higher percentages of these students being disproportionately impacted.

Currently, points are distributed for academic achievement and academic growth on assessments for all students and for the performance of individual student groups, including students eligible for free/reduced-price lunch-eligible students, students identified as minority, multilingual learners, and students with an Individualized Education Program (IEP). Because students can belong to more than one of these student groups, their assessment data may be scored and considered for points under an indicator on the performance frameworks multiple times, thereby increasing the weight of their assessment scores.

An analysis by CDE was conducted using 2023 accountability data that shows that the relationship between the percentage of framework points and student characteristics (e.g., Multilingual learners, Students that are FRL eligible, Students with IEPs, Minority students) ranges from weak to moderate:

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- **Achievement indicator:** The correlation between achievement and some identified student characteristics varied weak to high based on the different student groups.. Specifically, there was a high correlation between free and reduced-price lunch eligibility and achievement scores.
- Growth indicator: The department's data analysis also reported very weak to weak correlations between growth and student characteristics.
- PWR indicator: The relationship between the PWR indicator and student characteristics ranges from very weak to no relationship, however, there is considerable variability when examining the sub indicators (i.e., SAT, graduation, matriculation, dropout). For example, there is a strong relationship between poverty and SAT evidence-based reading and writing.
- Plan type assignment: When aggregating the performance indicators (i.e., achievement, growth, PWR) performance indicators together, the correlation between plan type assignments and student characteristics have a weak to moderate correlation because of the greater weight given to growth in the frameworks. Some of the results are likely impacted by factors such as low participation rates and opt-outs.

FINDING	**Further recognizing Students with Disabilities**
	See Recommendation 3 for solutions

The criteria used to include students with disabilities in the disaggregated student group categories for data reporting and framework-scoring purposes is not aligned with the criteria used for multilingual learners, and excludes students who make academic progress and who no longer meet the eligibility criteria for an IEP. This may mask the positive impact some schools are making on students with disabilities.

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).

In Colorado's accountability system, only students eligible under IDEA are currently counted in the group of students with disabilities. This means that when students no longer meet the criteria for IDEA, and are exited from their IEP, they are also excluded from this student group for data reporting and framework calculation purposes. While this rule is in line with federal requirements, this can have a negative impact on schools' and districts' performance ratings because these exited students' potentially higher achievement and growth scores, while still included in the all students category, are no longer included in the students with disabilities student group. Effectively, when schools and districts move students off of IDEA eligibility the data reporting and framework calculations do not recognize these accomplishments within the students with disabilities student group. Likewise because these students may still have a disability and may be eligible for accommodations despite no longer being eligible under IDEA, they should still be considered in the students with disabilities group. Elsewhere in the accountability system, multilingual learners continue to be included in the English Learner student group for multiple years after they are redesignated.

For more information on how Colorado English Learners are included in Colorado's ESSA plan, please refer to the [Additional Insights: State and District Performance Frameworks](#) section within this document.

FINDING	**Volatility in schools and districts with low student numbers**
💡🔍	*See Recommendations 4 for solutions*

Schools and districts that serve a smaller population may experience volatility in framework scoring and data reporting because of low student numbers.
The rules for calculating performance framework ratings and publicly reporting of student results may create volatility for schools and districts that serve a smaller population. First, the number of students may fall below the threshold for public reporting resulting in frameworks with few or no outcomes publicly reported. Systems that have sufficient student numbers to report may only be evaluated on the highest-level sub-indicators. Additionally, if a school or district has a population of students that are similar in size to the public reporting threshold (e.g., 20 students), small year-over-year changes in student numbers may impact what data is reported. For example, a school with 19 students with growth scores over three years does not have data available for public reporting but if that population increases by one student the following year, they will have publicly available data. Additionally, when a school or district has a small overall total population of students, each student will account for a larger percentage of the total population, which may significantly affect overall performance scores. While this is less visible for the academic achievement and growth indicators because of the use of the mean scale score and the median growth percentile, it is most pronounced for indicators that use percentage metrics, such as the graduation and dropout rates.

FINDING	**Postsecondary Workforce Readiness (PWR) focus and indicators**
💡🔍	*See Recommendations 6, 7, 8, and 9 for solutions*

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.

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. However, even with investments in postsecondary workforce readiness programming, opportunities are not equitably available to every student across the state due to various reasons, including programming costs, availability of qualified instructors and transportation. Many school districts also find the funding streams confusing or inaccessible, which

carries a high administrative burden. Every Colorado student should have these opportunities, and schools should prepare students to be ready for both postsecondary education and the workforce 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 of 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 national leader 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 measures of actual student outcomes in these areas 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.

🚨 In addition, attention was given to a unique group of Colorado students unlikely to graduate because of extreme special circumstances, such as a student enrolled for the first time in the U.S. education system at the age of 17 and/or a student with a significant disability who may not meet graduation requirements.

The latter, for example, represents some students where some districts do not provide them with a diploma but rather provide them with a certificate of completion. Districts provide them the certificate of completion because they do not meet the stated graduation requirements. These students attend school through the semester that they turn 21.

Students who receive a High School Equivalency diploma (HSE) do not count towards the graduation rate. CDE has previously requested from the U.S. Department of Education (USDE) the flexibility to count students who earn a HSE diploma towards the graduation rate, and USDE denied the State's request.
🚨

FINDING 🔍💡	🚨 **Overall weighting of framework indicators** **See Recommendations 9 for solution**

Given all of the District and State Performance Framework findings, and the recommendations that follow, the task force considered whether a future review of the accountability system's weighting of indicators is necessary.

Ultimately, caution should be taken when making any changes to the weights for the framework indicators. Achievement and growth must still be considered together, and PWR remains an important

indicator of student and education system success. If one indicator is weighted more, the implications to the other areas of the framework must be considered. This is particularly salient if other changes to the framework indicators - as outlined in the recommendations in this report - are made.

Recommendations for District and School Performance Frameworks

Recommendation #1: Lower student count thresholds for accountability calculations and reporting

Adjust CDE policies to allow more students to be counted in performance frameworks and allow for more transparent public data reporting.

Disaggregating results for students in historically underserved student groups in public reporting is extremely important. However, ensuring these smaller student groups 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 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. Implementation of this recommendation should ensure the state remains in compliance with existing laws and regulations to protect student privacy.

One concern around this recommendation raised by stakeholders representative of many schools or districts that serve small student populations is around how lower student count thresholds for calculations and reporting may impact volatility, an issue that already exists with the current thresholds. Out of consideration for schools or districts with small student populations, especially, this concern could be addressed with a thorough and complete study by CDE – including consulting with TAP – on the impact of lowered thresholds on schools with small student populations. The study should explore how framework points and ratings change with the lower thresholds and evaluate the costs and benefits associated with these changes (with a focus on transparency and volatility). 🚩 The study should also answer the question, "what is the minimum number of student results needed in order for a district/school to draw conclusions for strategic actions?" 🚩 This recommendation positively addresses an increased transparency goal for student groups, but could potentially negatively increase volatility of some schools with small populations of students. Acceptance of Recommendation 2 would prevent this volatility impact, which is why the two recommendations should be accepted together.

Recommendation #2: Combine student groups for ratings while disaggregating student groups for state reporting

Reporting of disaggregated data is critical to identifying and being able to address academic inequities between groups of students. Yet to ensure equitable impact of each student's data, points assigned through the accountability system's framework should reflect a combined student group approach with regard to growth, achievement, and postsecondary workforce readiness indicators. This means only the all-student group and combined student group would be scored for points on the framework. This will ensure that scores for students included in multiple groups will not be counted multiple times toward a school and district's rating on each indicator of the accountability system, and it will increase the

likelihood that schools that do not currently have sufficient data in individual student groups will still have scores for all student groups within the combined group.

The combined student group would represent a distinct count of students falling into one or more of the individual student groups, including students eligible for free/reduced-price lunch, students identified as minority, multilingual learners, and students with an IEP. This means that even if students belonged to more than one of these groups, they would only be counted once for scoring framework points.

For reporting purposes, CDE must continue to report the performance by student groups (if it meets the minimum threshold), even if points are not tied to each student group on the performance frameworks.

For the detailed analysis supporting this recommendation, including implications on how this recommendation diverges from federal accountability and reporting, please refer to the Additional Insights: State and District Performance Frameworks section within this document.

Recommendation #3: Expand the student with disability group for calculating results

Expand the student with a disability student group reported on the performance frameworks to include the combined count of students identified under IDEA and students that have exited from an IEP (as they no longer meet the eligibility criteria) for two years following their exit. Specifically, when a student is no longer eligible as a student with a disability under IDEA, that student, as currently allowed by federal accountability[11], will continue to be designated in the disability student group for no more than two 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' performance is no longer included in the students with disabilities student group.

Recommendation #4: Explore best practices and monitor the accountability system to identify and reduce issues of volatility that impact schools and districts with small student populations

CDE should explore best practices for minimizing volatility in small systems while monitoring the current system for volatility as part of implementation of this Task Force's concurrent recommendations. The exploration of best practices should include supplemental measures tailored for small schools and districts informed by the legislated Local Accountability System grant in Colorado, such as the Student Centered Accountability Project (SCAP). Under SCAP, for example, participating sites still must participate in the state accountability system -- but they are given some supplemental ways to share their local work (e.g., CDE posts their measures alongside the frameworks). A study commissioned by CDE could look at how other states address accountability for schools and districts with small populations of students within their state systems while controlling for the inherent volatility.

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[11] Federal accountability and reporting allows a state to continue to count a student in the Students with Disabilities (SWD) student group for no more than 2 years after exiting. To read more on the federal statute, read here.

In line with the 1215 Task Force's recommendation, move SAT Reading/Writing and Math achievement from the PWR Indicator to the Achievement Indicator. PSAT Reading/Writing and Math achievement are currently represented in the Academic Achievement indicator and growth is included in the Academic Growth indicator for both PSAT and SAT scores , while the SAT achievement is included in the PWR indicator. Moving the SAT achievement results from the PWR indicator to the Achievement indicator allows the PWR indicator to include other measures that better assess postsecondary and workforce readiness. It also brings consistency between the use of PSAT and SAT achievement and growth results within the framework calculations.

Implementation of this recommendation requires statute change. Currently, C.R.S. § 22-11-204(4) requires the PWR indicator include "the percentages of students enrolled in the eleventh grade in the public high school who score at each achievement level on the standardized, curriculum-based, achievement, college entrance examination administered as a statewide assessment or the percentages of students enrolled in each of the grade levels included in the public high school who score at each achievement level on the assessments administered pursuant to section 22-7-1006.3 by the public high school." As such, this recommendation requires a change in statute.

🔲Recommendation #6: Create "College and Career Readiness Before Graduation" sub-indicator to PWR

Expanding on 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 and high schools serve a critical role in preparing students for postsecondary success. As such, the 1215 Task Force identified the shared vision that by the time a learner graduates from high school, they should have no-cost access to a high-value industry credential; college credit aligned to an intentional pathway; and a meaningful work-based learning experience. Accordingly, the 1215 Task Force recommended the inclusion of concurrent enrollment as a PWR indicator.

Creating a new sub-indicator, "College and Career Readiness Before Graduation," reflects activities throughout grades 9-12 that practitioners know to be impactful in preparing students for their chosen path after high school. The new sub-indicator provides schools and students with flexibility in the college and career readiness programs it provides for students. Recognizing that not all courses or work-based learning opportunities are currently created equal, the intent of this recommendation is to provide all students with access to high-quality options that result in passing scores and meaningful credits and experiences, such as through:
- Concurrent enrollment courses
- Advanced Placement (AP)
- International Baccalaureate (IB)

- State-recognized work-based learning experiences
- CTE courses
- Industry-recognized credentials
- Early college programs resulting in AA?

To further emphasize this recommendation's focus on high-quality options that lead to meaningful credits and experiences for students, the State should also consider:

- This sub-indicator would recognize schools and districts for each quality college and/or career readiness option students successfully complete (e.g., passing grade, credential, certificate) while in high school.
- 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, industry-recognized credentials, 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.

CDE and the TAP have an important role to play in ensuring implementation of this recommendation is carried forward with fidelity to these goals. Consistent with CDE's practice of reporting new measures for one year for informational purposes, this new measure should require time to study its impact on the overall rating).. A combination of approaches acknowledges that while all schools/districts are currently required to offer concurrent enrollment, it may take some time to build and develop the additional offerings to meet the intent of this measure.

The Task Force recognizes the complexity of adding a new sub-indicator to the framework, and appreciates that these changes mark the beginning of a new opportunity to measure a broader definition of postsecondary and workforce readiness success in school. In order to ensure that the work continues, data from the sub-indicator should be disaggregated, transparent and made available at the student level, and be reviewed annually. The student-level data review is intended to inform activities that ensure equitable access to and completion of postsecondary education pathway activities; to ensure that a disproportionate number of students achieving these indicators do not mask or skew the sub-indicator; to inform resource allocation decisions; and to evaluate the impact on smaller schools and districts, consistent with Recommendation 4. In line with the above, CDE should update collection capabilities so it is efficient for districts to report high-value industry credential attainment and work-

based learning experiences and required reporting under this sub-indicator.

Note: Through C.R.S. § 22-11-204(4), the Colorado Department of Education has the authority to add new sub-indicators to PWR.

> ## 🚨Recommendation #7: Rename the PWR matriculation rate indicator and thus expand it to be more inclusive of high-quality postsecondary options

Rename "matriculation rate" to "postsecondary progression" as a PWR sub-indicator and expand what is counted toward this sub-indicator to be more inclusive of the suite of high-quality postsecondary options available to students. While recommendation 7 is specifically designed to recognize the PWR opportunities available to students while they are *in* high school, this recommendation is designed to continue the state accountability system's recognition of how well schools and districts are preparing students for PWR opportunities *after* traditional high school years. The Task Force recommends changing the current name of the "matriculation rate" sub-indicator to the "postsecondary progression" sub-indicator, as the former specifically refers to entry into a college or university and does not accurately capture the myriad high-quality options available to students beyond high school and how K-12 education can prepare students for college and career success. These options include but are not limited to post-high school enrollment or enlistment in:

- Career and technical education programs
- Extended high school options in current programs like ASCENT, P-TECH, and T-REP where students are continuing to gain college credit beyond grades 9-12
- Associates' degree programs
- Bachelor's degree programs
- The military

The renamed "postsecondary progression" sub-indicator should continue to include learner progression data into post-high school enrollment into associates' degree programs, bachelor's degree programs, the military, and extended high school options in current programs like ASCENT, P-TECH, and T-REP where students are continuing to gain college credit beyond grades 9-12.

The Task Force also recommends that the renamed "postsecondary progression" sub-indicator begin to include learner progression data on additional high-quality post-high school opportunities reflected in [Colorado's Work-Based Learning Continuum](#), 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).

As the state moves forward with developing a Statewide Longitudinal Data System (SLDS), as created in SB24-1364, we recommend that it can efficiently integrate individual district reporting to better measure the short-term and long-term outcomes of these program pathways. There is opportunity to both reduce the data burden on school and district data reporting , as well as better measure the outcomes of PWR programs across the state. We recommend continued investment in and

development of the SLDS to ensure students who graduate from the K-12 system are both college- and career-ready. Efforts to measure program outcomes must take into account the capacity of schools and districts to report data, especially in cases where the SLDS will not have data. We also recommend using data matching with relevant sources to ease the school/district data reporting burden.

🚨 Recommendation #8: Conduct a study to determine the possibility of including certain students as completers in the accountability frameworks

CDE should be given the appropriate resources necessary to conduct a study to determine whether students who met specific criteria would benefit from earning an High School Equivalency (HSE) diploma and how the successful completion of an HSE diploma may be included in the accountability frameworks. Specifically, a student who newly enrolls in a high school overage (e.g., 17+ years old) with significant credit deficiencies may be best served by earning an HSE Diploma. Earning an HSE diploma should be counted towards framework points as a completer and not be counted against a high school's graduation rate. The student would be permitted to continue enrolling in high school coursework towards course completion until they reach the age of 21.

Approximately 10% of students with disabilities eligible under the IDEA work towards extended evidence outcomes. These are students identified as having an intellectual or multiple disabilities (sometimes autism). Said students typically enroll in public education at age 3 and attend school through the semester they turn 21. Some schools work with the student to develop a Capstone Portfolio; as such these students are eligible for a high school diploma and are included in the graduate count. A school/district also has the option to simply issue a certificate of attendance when the student turns 21. Students receiving a certificate are not counted as a completer. The department of education could require that a Capstone Portfolio be developed for each of these learners. If the department of education allows autonomy for the school/district to determine whether they issue a diploma or a certificate, the department should count these students in their graduation count.

Note: Federal accountability does not allow for completers to be counted in the graduation rate. CDE has previously pursued a change to allow for it, but the U.S. Department of Education did not approve it.

🚨Recommendation #9: Re-evaluate weighting of frameworks to see if there should be an even greater emphasis on growth.

CDE should re-evaluate weighting of framework points to see if there should be an even greater emphasis on growth.

Assessments Used for Accountability Ratings

Assessments drive key elements of a high-quality, relevant education and serve different purposes for different stakeholders. For any 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 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) from the Federal Department of Education.

For a more detailed analysis of what the Task Force members considered, researched and decided around the following assessment recommendations, please refer to the Additional Insights: Assessment section within this document.

FINDING	

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 testing 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.

FINDING	

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. A student is only eligible for a Spanish language version of a CMAS math, science, social studies, or CSLA (in place of ELA) content area assessment if the following three conditions are met:

> 1. The student is identified as Non English Proficient (NEP) or Limited English Proficient (LEP).
>
> 2. The student has received instruction in Spanish in the assessed content area within the last nine months. (This is defined as Spanish curriculum for Language Arts and as Spanish accommodations/supports for math, science, and social studies. This Distinction for math, science, and social studies is key to making the Spanish versions of the assessments accessible to students who are in districts that do not provide Spanish instruction but are providing Spanish supports.)
>
> 3. The student has received instruction in an English language development program for five years or less.

The CDE provides a CMAS Spanish Assessments Decision-Making Flowchart to help districts/schools determine eligibility supports: https://www.cde.state.co.us/assessment/cmas_spaassessflowchart

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[12] Colorado Department of Education (2024).

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.

FINDING	

Accommodations and accessibility features are currently available on the state assessments to make the assessments accessible and help all students demonstrate their mastery of the Colorado Academic Standards' expectations. Accessibility features are available to all students. Accommodations work to provide equitable access to the assessments and are available to students with disabilities and multilingual learners who have a documented need. It is important to ensure that students that need these accommodations are receiving them.

FINDING	

Given the role state assessment plays in the accountability system, it is critical for results to be reported in a timely and transparent manner. School and district leaders use the data from state assessments for instructional and operational decisions as well as improvement planning.

Parent and community stakeholders engaged through the task force want results of their students' state summative assessment results to be released on a faster timeline. Currently, these results are publicly released around the same time as the State releases its accountability ratings. This occurs much later than parents would prefer as it reduces the time they have to support their children ahead of the new school year.

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

In addition, if school districts are going to use research based best practices to intervene in schools that are underperforming, results need to be received early enough for personnel and improvement efforts to take place. For example, a school district might want to add additional personnel, change personnel or provide summer training for improvement. Because school district budgets and personnel timelines do not coincide with the release of assessment results it significantly limits a more rapid implementation of improvement efforts. Currently, schools and districts receive student level achievement data files and aggregated summary files in June. Additional reports are provided in July. Public release of results typically occurs in August. Districts and schools are encouraged to use their results for improvement and planning purposes as soon as available (currently in June/July). However, districts begin planning for the following school year much sooner than the summer.

FINDING	

Since results from the state assessment are used in the Colorado accountability system and the extent to which students have participated in those assessments impacts 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 (i.e., English language arts, 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 the overall rating is reduced by one level.

FINDING	

In 2015, the state of Colorado adopted a law (HB 15-1323) that afforded individual parents the opportunity to opt out of federally mandated state testing. This decision has created challenges with the current implementation of the state and federalwide accountability systems. Colorado's Consolidated State Plan must align to Federal accountability under ESSA and does not allow for an exception to the participation rate, including parental excusals or other nonparticipants. plan also must account for parent excusals along with other nonparticipants. For federal accountability opt outs are simply counted as non-participants and/or the lowest possible score. A school can have up to 5% of its students not participate in assessments and there would be no penalty in the academic achievement indicator for accountability purposes. If a school has 95% total participation, CDE does not have to assign

the lowest possible score to any students. However, if only 85% of the students participate in the assessment, then 10% of the students would be assigned the lowest possible score on the academic achievement indicator when identifying schools for support and improvement under ESSA. Calculations are run first to identify schools based on actual performance. Then calculations are done to adjust the scores for non-participants above 5% with the lowest possible score. Any schools identified under the second round are labeled as (their designation) followed by "due to participation.".

HB 15-1323 also 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, close to 115,000 students (just over 10% of students statewide)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.

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.

FINDING	

While not all schools and districts with low total participation are a result of coded 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/ reading and writing and math). Additional criteria can also result in the automatic assignment of an ISD plan type/rating (e.g., school does not have any tested grades such as a K-2 school), 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 request to reconsider

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[14] Colorado Department of Education.

condition requires the district to demonstrate that the tested student population is not representative of their total student population.

There are schools and districts across the state that have a higher percentage of students who don't take the test as a result of organized opt out efforts. Concentrated pockets of opt outs skews the individual results of a school or district's data. While Colorado law does not allow schools or districts to encourage parents to opt their children out of taking the state assessment, there is nothing prohibiting parents from organizing these types of opt out efforts. While we identify this as a challenge, and we also are aware that there are recommendations we are making in other places in this report that could have an impact on this issue of opting out. Those include changing the rules for awards and the Distinction designation as well as changes to the state summative assessment. If these changes are implemented, the number of parents opting their students out may be reduced.

The following recommendations are intended to improve the required state summative assessments in Colorado and are grouped into categories including increasing equitable access to assessments, participation in the required state summative assessments, more accurate and timely data, as well as some areas for further study.

Assessments for Accountability Recommendations

Increasing Equitable Access to Assessments

Recommendation #10: Develop Assessments to Assess Content in Languages Other than English and Spanish
Create assessments of math, science, and social studies assessments in additional languages besides English and Spanish. Expand the Colorado Spanish Language Arts (CSLA) assessment beyond grades 3 and 4 and make Spanish high school level state assessments available. Include home languages that are most represented in multilingual learner populations in Colorado. Spanish forms and local translations into other languages are already available for CMAS math, science, and social studies. Students should have access to these assessments (including the high school level state assessment exams) in additional languages, rather than local agencies relying on local resources for translations It is important to ensure that assessments are not just translated, but are created to be accurate assessments in another language and are linguistically and culturally responsive. We should also make it easier for students to qualify for taking assessments in other languages

Recommendation #11: Improve the Accommodations for Students by Dividing the CMAS into Smaller Sections

Divide the CMAS assessments into sections to, more specifically, evaluate the desired skills. This would allow for more clear accommodations for students. 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. S

Participation in the Required State Summative Assessments

⚠ Recommendation #12: Clarify How Schools can Encourage or Not Discourage Test Participation

Option #1: Allow schools and districts to encourage and incentivize participation in state assessments.

OR

Alternate recommendation for consideration:

Option #2: Clarify what schools can and cannot do regarding encouraging and not discouraging participation in the state assessment. Provide clear materials for communicating with families about the importance of the state assessments in supporting students, schools and districts, and how they can encourage participation within the boundaries of the current law. Make it clearer what is not allowed regarding discouraging participation in the state assessment and follow up with schools and districts that are encouraging parents to opt their students out of state testing.

Recommendation #13: Change which Students Count for Participation

Review and update the process for determining which students count for participation rates and how to report better/share information about who is and is not participating in the assessment. Adjust "total participation" by removing, for example, misadministration or second-year non-English proficient students (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 were not required to take the state tests, but their results still counted for participation.

More Accurate and Timely Data

Recommendation #14: Make the CMAS Assessment Adaptive

Make the CMAS assessment adaptive as permissible under the current ESSA requirements. 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. If the student does not receive a performance level based on 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 sub score to state assessment reporting. A CMAS adaptive assessment, like the current PSAT/SAT, would require students, aside from those who need paper for accommodation purposes, to test on the computer. While this would reduce the number of misadministration's and would decrease the time required to produce assessment results, it could create a burden for schools with limited computer access and could increase inequities. There must remain a way for students with special needs to receive accommodations, and we must be able to ensure support for schools and districts that need additional support to make this shift. This would require connectivity support, equipment improvements and training.

Recommendation #15: Improve the Timeliness of Assessment Results

Action should be taken to improve the timeliness of state summative data so that the data are provided quicker to school leaders, educators, and parents.

Individual student reports should be made available to families as soon as possible, even before public reporting is available. The task force discussed the possibility of sharing individual student results with students and their families ahead of school and district reports (similar to what currently happens with the College Board assessments). School and district reports take longer to publish because they often require more time to put into an accessible and meaningful format.

This data, along with other local data, is needed to create school and district improvement plans, plan for appropriate professional learning, determine class placements and to determine interventions and supports for students.

Recommendations for Further Study

CDE should be given the appropriate resources necessary to research and recommend action in the following areas related to assessment:

- **Continue to reflect on and adapt the state assessment to newer technologies. Specifically, continue to consider how technology, such as artificial intelligence, may/should impact state assessments (including scoring constructed responses).**

- **Further explore the rules around opting out of the state assessment, and the impact it has on the accountability system that is based almost solely on these test scores.** Colorado

> is one of only 11 states that allow students to not take required state assessments. Under what circumstances should a parent be allowed to opt their child out? We should also work to normalize taking the test so the majority of students are assessed and are counted in the accountability system.
>
> - **Seek input on making modifications to the state's approach to non-federally required assessments, including:**
>   - Maintain the reading/writing, and math assessments in grades 9 and 10 (PSAT 8/9 and 10), as these provide high school students with early indicators about their level of readiness and 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.
>   - 🚩Consider eliminating the elementary and middle school school social studies assessment.

Public Reporting and Engagement

Several factors determine whether a state's accountability system is effectively reporting key information and adequately engaging parents, educators, policymakers and other key stakeholders. 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 other 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 progress happening in Colorado schools.

While the Colorado public reporting system is comprehensive, the Task Force has identified several bright spots that need to continue or expand, and several areas that could be improved. The recommendations that follow focus on the data the state should make available to all stakeholders, and ways the state can make those data more purposeful, user-friendly and accessible to all. Please note: The task force also reviewed the state's existing stakeholder groups on the accountability system. To learn more about related findings, please click here.

FINDING	**There is a need for a coherent, statewide data reporting system.**
	See Recommendation 16 for solution

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.

By contrast, the initial dashboard presented on SchoolView.org does not provide explanation or rationale for inclusion. Indicators such as attendance rates and student-teacher ratios are prominently displayed, while academic achievement and growth are not available without many clicks or by jumping to different versions of comprehensive dashboards on CDE's website. Different, narrowly tailored dashboards appear to be run by specific units (e.g., graduation rates). This makes it difficult to understand which dashboard is supposed to be the primary source of information. In addition, no K-2 data exists for parents, community members and policy makers to review at a statewide level.

FINDING	

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 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 varies across districts, with some districts having completely different bars than other 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.

As the State develops a coherent, statewide dashboard it will be important to maintain focus on key indicators that span the P-12 continuum. The Task Force also discussed creating space for local indicators to be displayed for users who want to learn about the local context, though in a way that would not lead to confusion between the state's accountability system and additional data that local districts may make available. Some, but not all, of the most essential indicators are identified in the next finding, below.

FINDING	**Colorado data is difficult for stakeholders to find, access, navigate, and understand.**
	See Recommendation for 17 for solution

While Colorado reports an array of education data, several areas need improvement. Issues include accessing and being able to understand accountability data that the State regularly collects as well as

some stakeholders wanting access to data for informational purposes to help them be better informed about results, options and expectations (and the degree they vary) between districts – from early childhood through postsecondary workforce readiness.

Below are some important and representative examples:
- 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.
- 🚨 Colorado has identified strong early childhood programs as a significant factor contributing to quality schools. Yet, parents and other stakeholders find it difficult to understand progress and results. 🚨
- 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. 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.

Recommendations for Public Reporting and Engagement

🚨 **Recommendation #16 Create one, coherent statewide dashboard that includes local and statewide data aligned with statewide instructional and PWR priorities**

Initial steps should include taking inventory and conducting a landscape and taxonomy analysis of the different dashboard versions managed by CDE, determining the data points and presentation formats most useful to key stakeholders (e.g., parents, educators, community members), flagging what is duplicative, and identifying key accessibility features that would enable the dashboard to be accessible to those with disabilities and for whom English is not their native language. This recommendation is congruent with the 1215 Task Force, which also recommended the creation of a public-facing dashboard with education and employment outcomes.[15]

The dashboard should prominently display all key indicators that map to Colorado's vision for student success, and explain why those indicators matter. Where data is not apples to apples comparable, the

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[15] [1215 Task Force Report](#) (p.9).

dashboard should clearly and transparently state that variables are inconsistent and, therefore, to be cautious about attempting to make comparability claims. Key indicators should include – at a minimum:

- *State summative ratings (SPF/DPF ratings), including trends over time*. While statewide dashboards can convey a wealth of information on school and district performance, summative ratings help parents and stakeholders interpret the data easily.
- Achievement and Growth data for all students and disaggregated by student group, with an indicator of which way the data is trending over time.
- *A link to local indicators if provided by school districts* (note: should disclose clearly these are local indicators selected by the district and are not part of the accountability frameworks since they are not comparable data points). Schools and districts should be allowed to go beyond SPF/DPF. 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..
- *Local K-2 measures as an addendum to state measures*. While the task force does not recommend incorporating K-2 measures into the performance frameworks (see p63 for additional context), it does recommend making K-2 student data available to stakeholders. This includes making these data 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.
- *Availability and outcomes of PWR programs* so that parents and communities can see the options available and student success rates in those programs..
- *Display of graduation rates on SPF/DPF* consistent with data privacy rules and threshold requirements.
- *School and district graduation requirements.* 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.
- A link to Improvement planning metrics

Given that some of the 1241 Task Force recommendations in reporting diverge from federal accountability reporting requirements, in cases where results being reported differ because of differences in Colorado and federal reporting, the dashboard should make it easy for stakeholders to see these differences and have a full understanding of why these differences exist.

Recommendation #17: Enhance the user experience with reporting functionality and support that offers all stakeholders a comprehensive, accessible, and user-friendly way to utilize data

Key functionality requirements should consider:
- *Searchability and customization.* The statewide dashboard should be easily searchable and customizable to meet the needs of different stakeholder groups (e.g., families, educators, community members). Stakeholders should be able to run customizable reports based on their own queries. All statewide, school, and district-level information should be easily searchable so that 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.
- *Efficiency of processes that schools and districts use to accurately share data.* 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.
- *Where data is not comparable, the dashboard should clearly and transparently state that variables may be inconsistent and, therefore, data may not be comparable so as to aid the public with accurately interpreting results.*
- *Provide training and support to stakeholders on how to utilize reporting functionality*, including the development of tools, videos, and other options for helping stakeholders utilize data.
- *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.

Continuous Improvement (Improvement Planning, Interventions and Supports, and Awards)

The following section includes all aspects of the continuous improvement process that is a part of Colorado's accountability system. It begins with Improvement Planning, which is a process that **ALL** schools and districts take part in. The next section is Interventions and Supports, which are provided to schools and districts that are in need of holistic or targeted support. Finally we discuss awards, that are to recognize and celebrate the schools and districts that are performing as expected or beyond.

Improvement Planning

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."[16] 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;
- analyze the performance of student groups, which is important for considering the efficacy of strategies being implemented;

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[16] Colorado Department of Education.

- 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 is intended to promote public visibility and transparency; offers schools and districts flexibility in what to prioritize and how to achieve improvements; help schools and districts remain in compliance with state and federal requirements; and provide detailed plans to help improve schools and districts on the accountability clock. However, some of the data doesn't capture the complexity and nuance of the numbers behind the data. For example, graduation requirements are a local control decision, yet our system reports graduation rates as if they are all the same, which can be quite misleading.

FINDING	

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 not only on compliance but 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.

The Task Force also believes that the connection between district improvement planning and school improvement planning varies a great deal depending on the size of the district. For example, in small districts with only a couple of schools, the district improvement plan is tightly aligned to the school improvement plan. In a very large district, these processes are much different, and a different template might be required.

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 in the future 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.

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.

FINDING	

While this Task Force agrees that the current process is meant to promote 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.

FINDING	

 The review process does not currently include UIPs for all schools.   CDE 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, resources should be streamlined to provide targeted resources and support for those districts and schools most in need of implementing effective improvement strategies. This would help ensure the improvement planning process leads to improved student outcomes.

FINDING 🔍	**Current resources limit support and interventions only for schools and districts already on the clock.** *See Recommendations 26 for solutions*

Limited supports and interventions are available to schools and districts that are in danger of not meeting expectations. 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. SB22-137 expanded access to school transformation grant program to schools and districts in improvement in an effort to prioritize proactive engagement. However, the need is so great for the identified schools, that there have not been enough resources to flow to sites that have the potential of being identified.

When schools and districts begin to struggle, they move into a Turnaround and Priority Improvement category and are put "on the accountability clock." CDE staff provide valuable expertise and technical assistance to this turnaround work. Schools and districts on the clock should receive intervention as early as possible so they can effectively move off the clock. Supports they receive should be continuous and coherent as well as evidence-based.

Supports and Interventions

When schools and districts need additional supports and interventions to meet expectations and ensure all students are successful, they are put on the accountability clock. Below, you will see the current progression of schools on the clock.

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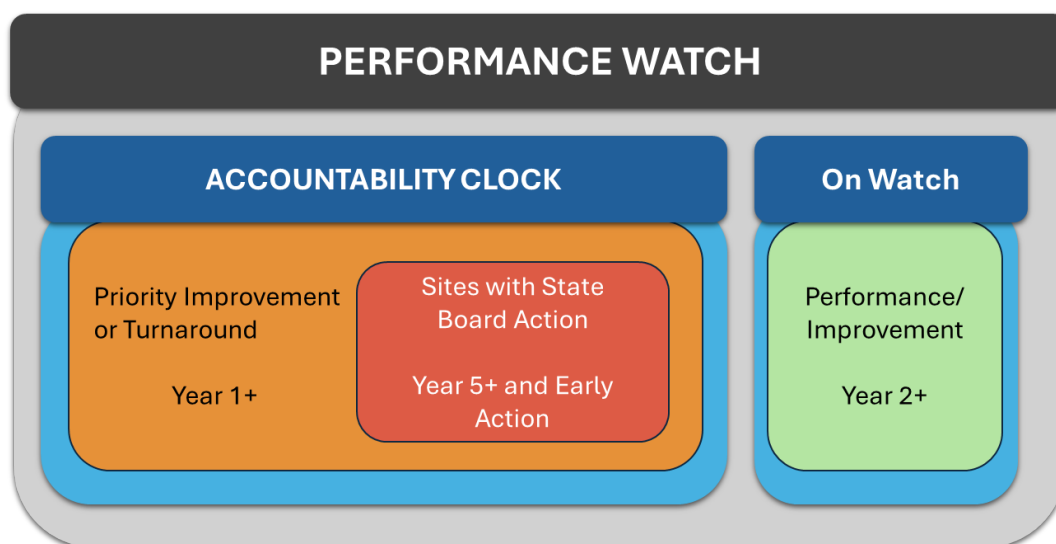
In the fall of 2019, the state began to implement HB 17-1355, which made adjustments to the accountability clock (e.g., two years to exit the accountability clock after at least two years on the clock, and introduced the concept of On Watch) to help stabilize the bounce and ensure sites had access to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

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.

Table X

Most Districts Earned an Accredited Rating or Higher

Distribution of 2024 Preliminary District Ratings

	Number of Districts	Percent of Districts
Distinction	17	9%
Accredited	78	42%
Improvement Plan	54	29%
Priority Improvement Plan	8	4%
Turnaround Plan	3	2%
Insufficient State Data	24	13%
Total	184	

Table X

Most Schools Earned a Performance Plan Type

Distribution of Preliminary School Plan Types

	Number of Schools	Percent of Schools
Performance Plan	1125	64%
Improvement Plan	325	19%
Priority Improvement Plan	120	7%
Turnaround Plan	47	3%
Insufficient State Data	109	6%
New School	8	<1%
School Closed	13	1%
Total	1747	--

* Note that 94 AECs are not included in these counts as ratings are still pending

CDE has created a Theory of Action that guides their actions in providing supports and interventions for schools and districts. 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. (to learn more about CDE's theory of action, click here)

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.

FINDING	**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. *See Recommendation 26 and 27 for solutions*

During the last two years, the Governor has made financial 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 before entering Performance Watch. 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.

While there has been some success, we are failing to meet the needs of ALL 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.

FINDING	**The State Board of Education (SBE) has limited tools for intervention with struggling districts and schools and the tools do not include designing and implementing a robust improvement plan.** *See recommendations 29 and recommendation for further study for solutions*

There are two intersecting challenges that need to be addressed: 1) having the SBE approve a robust improvement plan presented by the district is not required, and 2) the SBE options for directed action are limited and may not correspond to the district or school's actual improvement plan components. 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) and should be reviewed or expanded. 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.

Awards

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 the system 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 powerful 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.

FINDING	**There are success stories in our schools that we should be doing more to celebrate.** *See Recommendation 35 for solutions.*

Accountability does not always have to be about consequences. In fact, people are often far more motivated and driven by recognition. 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.

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. Many of the state's current awards focus on achievement and/or growth, with some also including a consideration for special populations, for example multilingual learners or students receiving free or reduced price lunch. A summary table of all awards currently offered by CDE can be found in Appendix XX.

FINDING	There's currently no prohibition against awards going to schools and districts with either low test participation or low performance across disaggregated student groups. *See Recommendation 36 for solutions.*

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 Distinction 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.

FINDING	The current awards we have are disparate and disconnected; as a result 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. *See Recommendation 34 for solutions.*

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. The State Board and CDE should be clear in the vision for success, so that all actions of the accountability system and the awards that are bestowed as a result, align to this concrete vision for education.

Given the stated concerns, the Task Force recommends the following actions be taken on the continuous improvement process in the categories of improvement planning, supports and interventions, and awards.

Recommendations for Continuous Improvement

Improvement Planning

Recommendation #18: Provide Guidance to Local Boards on Monitoring the Improvement Planning Process

CDE should work with CASB to 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.

Supports and Interventions

Recommendation #19: Implement a System of Early Identification and Intervention

Develop and implement an Early Indicators of Distress Evaluation recommended for all Prior to Clock schools that appear to be trending towards Year 1 identification and required for Year 1 schools likely to progress to Year 2. CDE may require a Diagnostic Review for these Year 1 Schools by a third party and/or with CDE. 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 #20: Provide More Support to Schools Starting in Year 2

Beginning in Year 2 on the clock, the CDE will offer schools and districts iterative support and ongoing feedback, beginning with developing a comprehensive school improvement plan. The Plan will be reviewed and feedback provided by CDE staff. In partnership with the District, CDE may make recommended modifications to the School Improvement 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. CDE needs to consider the district as a change agent and as the lever of change to improve the schools' outcomes.

Schools on the clock may be encouraged 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.

Recommendation #21: Support Schools and Districts Pursuing Bold Solutions to Turnaround

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, as well as a plan to sustain efforts once funding is exhausted. They should drive resources to the schools most in need by ensuring the district plan details the allocation of resources in this way. The Legislature should 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. Consider adding funds under the statute that directs CDE to "Support school districts, the institute, and charter schools in providing educator professional development and transforming instruction in public schools that are required to adopt priority improvement or turnaround plans for the immediate or preceding school year" to allow creativity in school improvement.

Some examples of plans that could be considered for additional funds include, but are not limited to:

- Management Restructuring—including, but not limited to, changing leadership roles, bringing in new talent**,** state school and district turnaround leader pools available for districts, state-vetted partnerships with external support or management organizations, 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.
- Although if the TF wanted to use the current statute to offer more creative funding options, I would put them under the statute section that says: "Support school districts, the institute, and charter schools in providing educator professional development and transforming instruction in public schools that are required to adopt priority improvement or turnaround plans for the immediate or preceding school year

🚨Recommendation #22: Require More Accountability for Schools (and districts?) in Year 4, 5 and Schools with Insufficient Data

Require schools and districts to come before the board in Year 5 (or Year 4 early action) with a CDE vetted plan that the state board approves and monitors the effectiveness of the 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.

Additionally, require schools with insufficient data to create a corrective action plan, and then if still ISD by the third year, then come before the Board.

Recommendation #23: Provide More Professional Learning According to School and District Plans

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, and provide funding to the CDE to develop and support districts in accessing the professional learning and resources. This would allow more informed planning and support to schools and districts.

Recommendation #24: Conduct an Evaluation of External Managers and CDE's Management of the External Management Process.

The CDE should be required to conduct an evaluation of external managers and the return on investment (cost of management vs. change in performance) 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.

Recommendation #25: Require Schools and Districts to Check In with CDE and with their Peers Regularly.

The legislature should require schools and districts with state board action to check-in with CDE every 3-6 months to monitor and ensure ongoing improvement and to share their progress with their peers. 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.

The State Board of Education should delegate authority to CDE to approve small changes to SBE approved 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.

Table X: Proposed Progression of Supports and Interventions

		Self-Assessment	School Improvement Plan Submitted to CDE to determine Recommendations Plan defines the resources, training,	Community Meeting to Discuss Plan and Progress CDE monitoring	If CDE recommendations are followed, funding with District match awarded If not followed,	State Review Process (SRP)	State Board Directed Action

			curriculum, materials, external partners, etc.	of Plan	no funding award (grant/ innovation funds, PPOR)		
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

Recommendations for Awards

Recommendation #26: Provide Additional Benefits for those Receiving Awards

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

Recommendation #27: Focus Awards on State Priorities and Values

Target awards to ensure maximum impact and focus on state priorities and values. To the extent possible, awards should be coherent with the accountability system. 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. We should consider including less tangible or leading indicators for academic achievement.

Recommendation #28: Conduct and Share Research on Best Practices in CO Schools

Ask 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. 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 #29: Change the rules on how Districts can Receive a Distinction Designation

Implement business rules for awards eligibility that address when a district should be eligible to receive a Distinction 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 student groups 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 student group 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 recommends a new set of common business rules that must be met to receive the Distinction rating. These include:

- Earn Sufficient points on the DPF to earn a Distinction rating.

- Student participation rates on assessments must be at least 85 percent (students that actually took the test)
- 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 student groups receive a "does not meet" rating for academic growth. And if we use a "super sub-group", no individual student groups have a median growth percentile (MGP) less than 35.

When a district has missed a Distinction rating because of low participation, be transparent about that, adding "due to low participation". This is to be transparent in reporting, and to encourage participation. There could be further communication to families about this, saying that we may have earned a Distinction rating, but we don't know, because of low participation rates.

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

Recommendations for Further Study

- **Consider expanding the purpose of the State Review Panel (SRP).** These reviews should focus on being diagnostic in addition to evaluative. The SRP should include additional meaningful data in its report so that the SBE may best evaluate the Plan and/or identify the best directive action. Research whether SRP should evaluate holistic district systems including budget, governance, operations, facilities, enrollment patterns that go beyond academics. 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 and taking action, such as a change in leadership. 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. This would require a statutory change.
- **Monitor the use of the new improvement planning template to ensure it is meeting the needs of the schools and districts, and continue to make improvements as needed.**
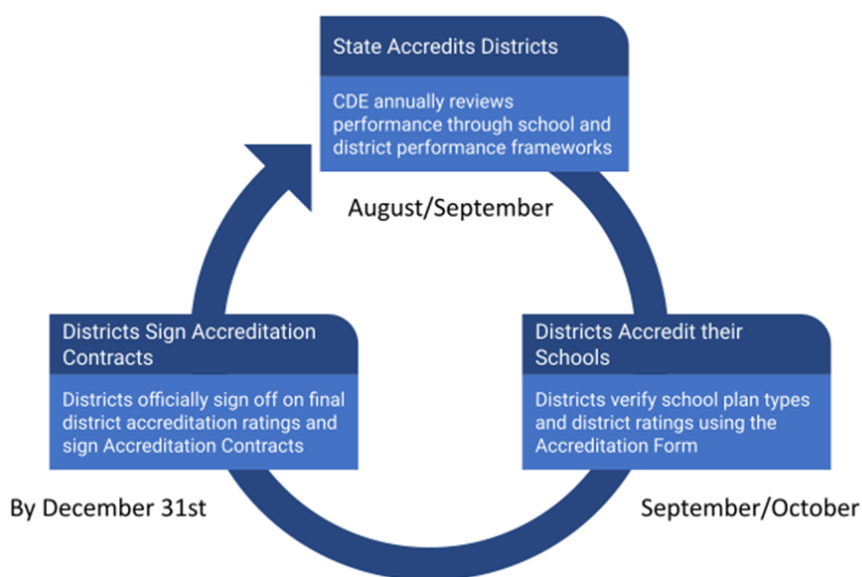
Accreditation

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 Accredit their Schools
Districts verify school plan types and district ratings using the Accreditation Form
September/October

Districts Sign Accreditation Contracts
Districts officially sign off on final district accreditation ratings and sign Accreditation Contracts
By December 31st

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.
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. It is important to note that schools with low test participation circumvent this standard.

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

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

1. Budget and financial policies and procedures (assurance, no data required)
2. Accounting and financial reporting (assurance, no data required)
3. School safety and Gun Free Schools Act (assurance, no data required)
4. 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 somewhat unusual in national and global accreditation processes. Especially when schools have students that do not take the assessment. 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 (of those students that take the assessment) 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.

FINDING	

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 a district that does not have a N-count large enough, even with 3 years of data, may still not meet the minimum public reporting thresholds. This occurs only for very small districts that would never have a high enough N-count even after 3 years of aggregations to meet the growth reporting requirements (i.e., less than 20 students in 4th and 5th grade over 2017, 2018, and 2019). Only these districts that receive an Insufficient Data rating may enter an alternate request to reconsider process and determine their own plan type. In a situation such as this, a district may choose to assign an accreditation of "Distinction" though no additional student outcome data is available for such a rating.

The Task Force believes that by adopting the recommendations that we've included in this report, these risks will be mitigated.

FINDING	

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.* Colorado's ratings are not intuitively understandable and could be updated to help leaders, educators, parents and other stakeholders comprehend the overall data.

These accreditation ratings draw attention to plan types rather than the district's status as "accredited." The names of these plans are confusing to communicate what they mean to local communities.

Recommendation #33: Do Not Publish Results Publicly Until the Request for Reconsideration Process is Complete

Utilize the request for reconsideration process for accountability ratings proactively by allowing schools and districts to address potential issues before preliminary scores are finalized,for a particular school or district that has entered the request for consideration process. 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.

Recommendation #34: Change the Names of the Plan Types

Change the plan types names so they are less confusing to stakeholders. We recommend "Distinguished, Low Support, Targeted Support, High Support, and Turnaround" to describe the improvement plans the districts are receiving. We recommend the same labels for schools, with the exception of having no distinguished category.

Areas for Further Study

- Once all improvements are made to the rest of the accountability system, have a group study how to align and improve the accreditation system.
- 🚨 Have experts study and determine better alternatives to the current plan type names, so that their meaning is more clear to stakeholders. 🚨

V. Conclusion

The recommendations in this report provide a roadmap to build on the successes of and improve Colorado's accountability system to the benefit of all learners across this state's diverse school communities. The task force encourages the legislature and CDE to consider these recommendations and work steadfastly to implement them, while considering how these recommendations may depend on and influence one another in practice.

The rigorous work of the 1241 task force, detailed in this report, provides an exemplar of how stakeholders with different perspectives and backgrounds can work together in good faith for the good of Colorado's students. The task force looks forward to working with the legislature, CDE, and other entities to implement and advance these critical recommendations.

VI. Appendices

A. Additional Insights

Additional Insights: District and School Performance Frameworks

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

Background on Colorado's threshold rules to inform accountability reporting and results
Colorado adopted minimum numbers for accountability reporting and results 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.[17]

Combined Student Group Approach

To explore the impact of a combined student group approach, the task force selected 12 districts for modeling the combined student group 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	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: Combined Groups of Students [Super-subgroup Performance Results Comparisons with Growth for 1241 TF 4.2024 2]

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

The task force reviewed this data to determine if the adjustment to a combined student group 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 student group once;
- addresses perceived "penalty" for serving historically underserved students that is caused by repeated counting of assessment scores for students who fall in multiple student groups;
- 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;

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[17] Colorado Department of Education (2023)

- ● 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 limited or modest (6 districts increased; 2 decreased); 51 schools increased; 15 decreased). impact on the rating system when the combined student group approach is used. It is important to know that the results and final ratings may also be influenced by other factors such as opt-outs, low participation, insufficient data, and requests for reconsideration. In the absence of these factors, the impact may be more significant than modest.

Reference to Colorado English Learners in Colorado's ESSA Plan
ESEA Section 3121(a)(5) requires that LEAs report on the number and percentage of ELs meeting the challenging State academic standards for four years after such students are no longer receiving Title III services. To meet this requirement, an LEA must report to the State on the academic achievement of an EL for each year of the four years after such student has achieved English language proficiency and no longer receives EL services. These data must include results on content assessments for reading/language arts, mathematics, and science. The students included in this reporting must include all former ELs served by the LEA who have achieved English language proficiency and therefore no longer receive any EL services.

The ESSA plan states: Colorado English learners (ELs) previously identified as Limited-English Proficient (LEP), who have been re-designated as Fluent-English Proficient (FEP), will continue to be included in the accountability calculations for the EL subgroup for an additional four years after Re-designation (Monitor Year 1, Monitor Year 2, Exited Year 1, and Exited Year 2). If a student previously Re-designated as FEP is determined to need additional language instruction services, the student will be reclassified as LEP.

Federal accountability and combined student groups
As of the writing of this report, the Colorado Department of Education has tried to propose the use of a 'super group' and it has not been approved. ESSA specifically requires the disaggregation of student group data, and inclusion of points in the identification process.

Implementation of a combined student group would be an area of divergence between state and federal accountability results because CDE would not be allowed to implement this recommendation for federal accountability per ESSA and the ESSA identifications.

Federal accountability and students with disabilities
The definition of children with disabilities in ESEA directly references IDEA: "(4) CHILD WITH A DISABILITY.—The term ''child with a disability'' has the same meaning given that term in section 602 of the Individuals with Disabilities Education Act." (see sec. 8101(4)).

The federal regulation that previously permitted the inclusion of students with disabilities for two years post their IEPs has been rescinded and is no longer in effect. According to the U.S. Department of Education, "Once a student with disabilities exits an IEP, the student must be removed from the students

with disabilities student group. The ESEA does not afford the same flexibility to students with disabilities as it does for English language learners."

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.

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 are 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: CDE's Theory of Action for Supports and Interventions

Click here to return to the Improvement Planning findings and recommendations section.

CDE adopted the Four Domains of Rapid Improvement to guide district and school's improvement when on Performance Watch. Supports are distributed through tiers (e.g., universal, targeted, intensive) and are driven by CDE staff and improvement funding channels. Following the State Board of Education's order is required, as is CDE's monitoring of the implementation of the board order. However, district participation in the Department's support is encouraged but is only voluntary. It is unclear if there are any steps or opportunities where a model school or district could mentor a struggling school or district without resources and support to accommodate this collaboration.

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.

Additional Insights: Early Grade Indicators

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

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.[18,19,20,21] Colorado must continue to support and expand quality early childhood programming for the success of our students. Family engagement in early years is also essential.[22,23]

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. The use of early grades assessments are most effective when used diagnostically and with a body of evidence to target foundational skills development.

Discussion of potentially incorporating early grade indicators into the state's performance frameworks
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 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, the task force recognizes that preschool and kindergarten are not compulsory, which limits public schools' responsibility over student performance. There are also a

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[18] Foundation for Child Development (2013)

[19] National Institutes of Health.

[20] The Education Trust (2014)

[21] National Bureau of Education Research (2022)

[22] U.S. Department of Health and Human Services (2020)

[23] NAEYC (n.d.)

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.

Ultimately, the challenges associated with adding K-2 measures to Colorado's accountability system resulted in the Task Force not recommending 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.

Additional Insights: Public Reporting and Engagement

Click here to return to the Public Reporting and Engagement findings and recommendations section.

Existing Stakeholder Groups Engaged by CDE on Accountability

There are five stakeholder groups that provide regular input and feedback into the accountability system with a focus on 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 supports districts as they engage with their School Accountability Committees (SAC) and District Accountability Committees (DAC). CDE consults with statewide advisory groups, such as the Technical Advisory Panel (TAP), the Accountability Working Group (AWG), 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.

Examples of States with Coherent Dashboards in line with the State's Educational Vision

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 student group 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.
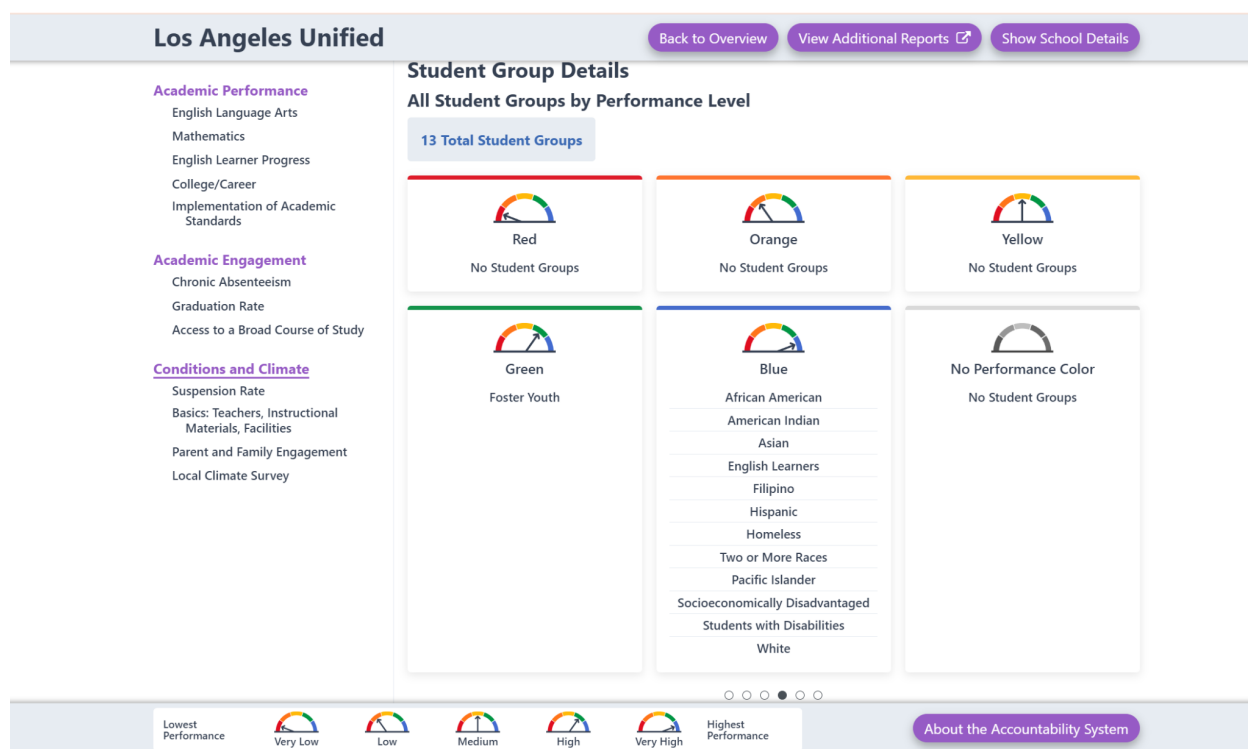
Example #2: [Indiana](#) provides a good example of an education dashboard with a clear vision for student success. Their new Graduates Prepared to Succeed (GPS) site greets viewers with an overview of why the data matter, the state goals for students, and where students currently meet those goals. After 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 student group 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](#).

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

Kindergarten Readiness

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

Coming soon

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

GRADES 3-8

3rd Grade Literacy

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

60.6% ▼ 2.2% | State: 81.9%

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%

GRADES 9-12

Graduation Pathways Completion

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

79.9% ▲ 2.4% | State: 89%

College & Career Credentials

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

No data available

GRADUATION AND BEYOND

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%

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%

About   Full Report

B. 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/Reading and Writing 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.

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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	-0.66	-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. Correlations 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 student 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.
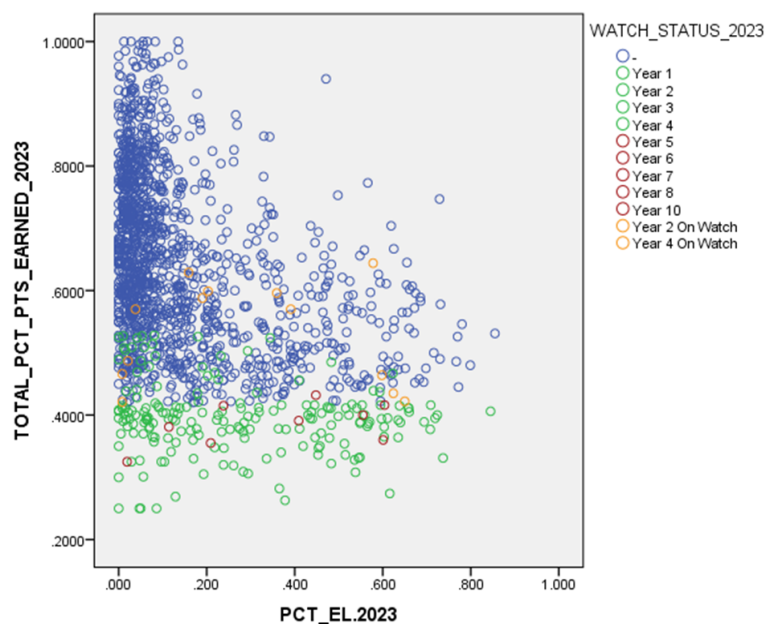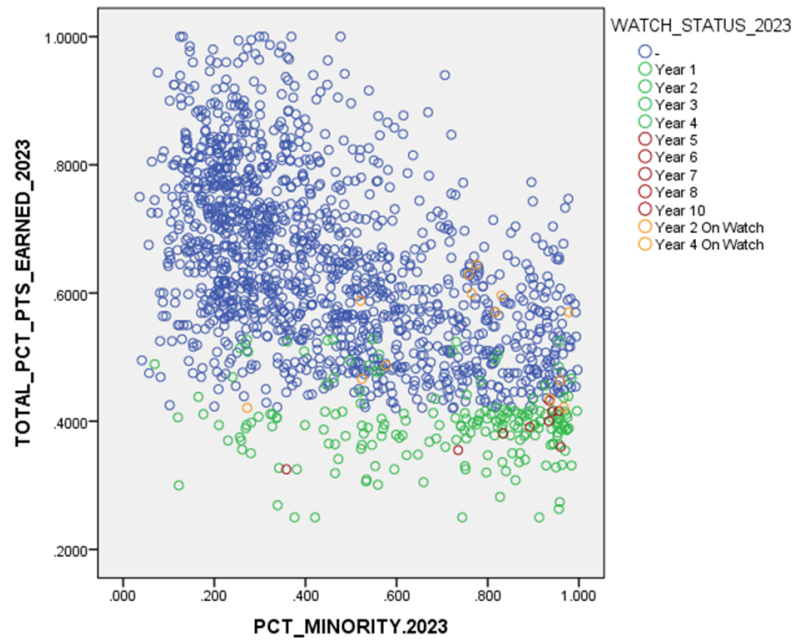
○ Scatterplot of Schools by Percentage of 2023 Framework Points and Free/Reduced Price Lunch. Summary: Note that there is a high frequency of schools that are not on the clock (blue) that also have a high population of students in poverty. There is evidence of some schools on the clock with a lower percentage of students in poverty. The schools much further along on the clock (red) gather around the higher end of the poverty scale.
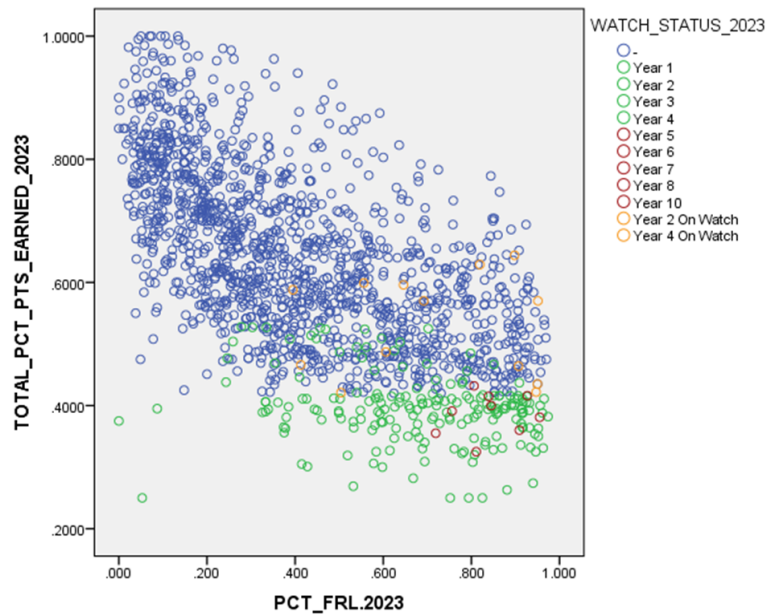
○ Scatterplot of Schools by 2023 Framework Points and Percent of Minority Students. Summary: Similar to the FRL scatterplot, there is a high frequency of schools that are not on the clock (blue) that also have a high population of minority students. There are some schools on the clock with a lower percentage 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:
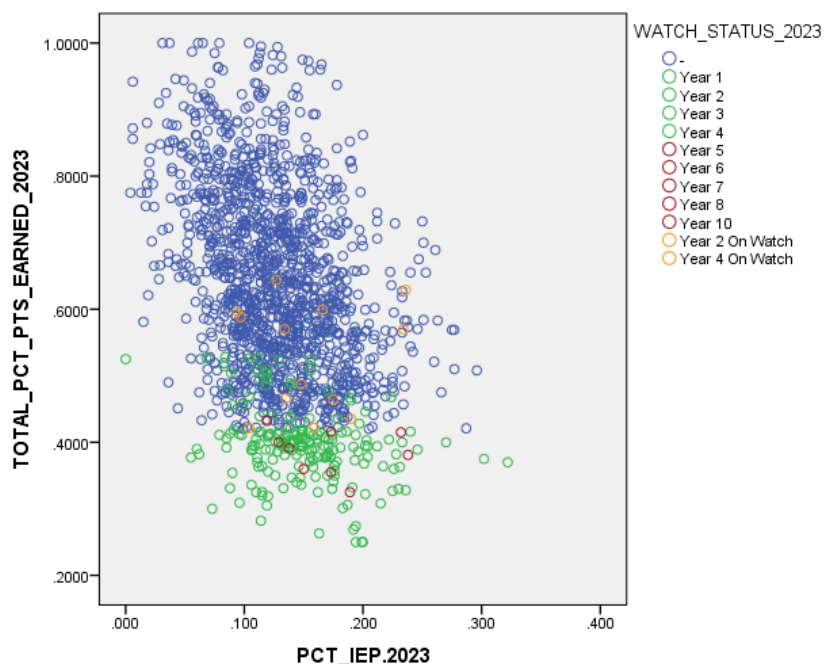
C. Impact of Assessment Participation Rates on Performance Frameworks

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.[24]

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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[24] [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.

D. Structures to Engage with Accountability System

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		
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	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	Overall, SACPIE is moving forward and typically productive. Positive support from the task force could be helpful.

		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.	
Accountability Work Group	Department of Education (not legislated)		

E. Summary of Current State Awards

Award	Award Description and Criteria	Level of Award	Type of Data	Consideration for Special Populations	Approximate # of Awards per Year	Authorizing Body
National Blue Ribbon	Schools are eligible if they meet one of two criteria: ● *Exemplary High Performing Schools:* Schools that are ranked among the state's highest performing schools as measured by state assessments in both reading (English language arts) and mathematics or that score at the highest performance level on tests referenced by national norms in at least the most recent year tested. ● *Exemplary Improving Schools:* Schools with at least 40% of their students from disadvantaged backgrounds that have reduced the achievement gap by making the most progress in improving student performance in reading (English language arts) and mathematics on state assessments or tests referenced by national norms in at least the most recent year tested. ● *Note:* At least one third of nominations must be schools with at least 40% of students from disadvantaged backgrounds.	School level	Achievement only	Yes	4-5	CDE submits to USDE for final selection

Colorado Centers of Excellence	Public schools in the state that enroll a student population of at least 75% that are at-risk pupils and that demonstrate the highest rates of growth, as measured by the Colorado Growth Model. On the school performance framework, these schools have demonstrated impressive results on the indicator relating to longitudinal academic growth.	School Level	Growth Only	Yes	10-20	CDE, as laid out in the state Accountability Act (C.R.S. 22-11-601)

Colorado Teacher of the Year	Each year, the Colorado Teacher of the Year Program honors an exceptionally dedicated, knowledgeable and skilled K-12 classroom teacher to represent the entire profession in the state. The selected teacher will automatically become Colorado's nominee for the National Teacher of the Year competition, a project of the Council of Chief State School Officers	Classroom Teacher	Nomination process	Not specifically named	1	CDE with entry into National Teacher of the Year process run by CCSSO
CLDE Academy Student Art Content	Discontinued during pandemic – Plans to resume the award later this year.	Student				
CLDE Distinguished Administrator	Discontinued during pandemic – Plans to resume the award later this year.	Administrator				

ELPA Excellence Awards	The English Language Proficiency Act Excellence Award program awards grants to districts and charter schools with evidence-based English language development (ELD) programs that achieve the highest English language proficiency and academic growth among English learners and the highest academic achievement for English learners who transition out of the English language development program. The ELPA statute requires the Colorado Department of Education (CDE) to identify Excellence Awardees using three criteria: ● Highest content growth for ELs in program, ● Highest language growth for ELs in program, and ● Highest content achievement for exited (former EL) students. Note: Discontinued in 2023-24, but may be reinstated by legislature.	Districts and Charter Schools	Achievement and Growth	Focus on multilingual learners	10	CDE based upon state ELPA statute
Governor's Distinguished Improvement Award	For schools that demonstrate exceptional student growth. On the school performance framework, these schools "exceed" expectations on the indicator related to longitudinal academic growth at all grade levels.	Schools	Growth only	Nothing specified	100	CDE on behalf of the Governor
Green Ribbon Schools	A Green Ribbon Schools award will represent a healthy and sustainable school, recognized by parents, students, staff and governments at federal, state and local levels as an exemplary	School	Nomination process	If more than one school nominated, one school	1-5	CDE nominates to USDE for final selection

	model of achievement in sustainability, health and environmental education.			must have at least 40% FRL population.		
High School Academic Growth	The High School Academic Growth Awards recognize high schools that demonstrate the highest levels of students' academic growth in reading, writing and math, within each classification used by the statewide association for high school activities for the sport of football.	High Schools	Growth only	Nothing specified	5-10	CDE through C.R.S. 22-11-601
John Irwin Schools of Excellence	The John Irwin awards are given to schools that demonstrate exceptional academic achievement over time. These schools received an Exceeds Expectations rating on the Academic Achievement indicator of the School Performance Frameworks reflecting exceptional performance in Math, English Language Arts, and Science.	School	Achievement only	None specified	200	CDE through C.R.S. 22-11-601
Milken Family Foundation National Educator	Known as the "Oscars of Teaching," the Milken Educator Awards honor excellence and specifically target early-to-mid-career education professionals who are currently accomplishing great things and show promise that those accomplishments will continue.	Teachers and Principals	Nomination	None specified	1	Confidential selection process prepared by CDE and submitted to the Milken Family Foundation

National Distinguished Schools	Examples of superior, federally funded school programs for national recognition through the National ESEA Distinguished Schools program (recently renamed from its predecessor, the National Title I Distinguished Schools program). Schools are selected in one of following categories: ● Category 1: Exceptional student performance and academic growth for two or more consecutive years ● Category 2: Closing the achievement gap between student groups for two or more consecutive years ● Category 3: Excellence in serving special populations of students (e.g., homeless, migrant, English learners)	Schools	Achievement and growth	Yes. Must have a poverty rate of at least 35%. One category is dedicated to excellence in serving special populations.	2	CDE works in partnership with the National Association of ESEA Program Administrators
United States Senate Youth Program	Provides an annual opportunity for talented high school students with demonstrated leadership abilities to deepen their understanding of America's political processes and strengthen their resolve to pursue careers in public service.	High School Students	Application criteria	Nothing specified	2 Student Delegates and 2 Alternates	CDE reviews application in alignment with the Hearst Foundations United States Senate Youth Program Rules

F. 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 education committees of the house of representatives and senate, the governor, the state board, the commissioner of education, and the department of education by March 1, 2024, an interim report with initial findings and recommendations, and by November 15, 2024, a final report, with findings and recommendations.

G. Task Force Membership

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	Correct - WB
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	Correct
Don Haddad, Ed.D., St. Vrain Valley Schools	Superintendent	House Speaker	
Dr. Rhonda Haniford, Colorado	Colorado Department of Education	CDE Commissioner	Correct

Department of Education			
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	Correct - RM
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	Senate Minority Leader	

Accountability System Grant)		

H. 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: ● CDE ● Researchers from CU-Boulder who evaluated the Transformation Network ● Representatives from the 1215 Secondary, Postsecondary and Work-Based Learning Integration Task Force ● 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 developed recommendations, as necessary, to address these challenges and opportunities	● Task force members divided into study groups to consider in greater depth elements of the accountability system and begin developing recommendations ● Task force members also engaged in 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 first phase of work culminated with the interim report, which included initial findings and recommendations, submitted on March 1, 2024 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 task force completed its work on November 15, 2024, when it delivered this final report to those same government officials.

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.

I. 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 Draft
- 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
- Consider the draft recommendations associated with Accreditation
- Work together to resolve comments that have been posted within the Draft 2 Google Doc under Frameworks, Assessments, and time permitting, Public Reporting/Engagement and Continuous Improvement
- Provide input on overall design and layout of report

Agenda Topics
- Welcome and Overview
- Whole Group Pulse Check on Draft 2
- Looking Ahead: Process for Completion
- Small Group Work Time and Whole Group Discussion: Frameworks and Assessments (time permitting, Public Reporting & Engagement and Continuous Improvement)
- Accreditation
- Time Permitting: Input on Layout and Design
- Closing

October 18, 2024

Objectives

Agenda Topics

October 22, 2024

Objectives

Agenda Topics

J. 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 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 ● Dr. Brenda Dickhoner ● Erin Kane ● Tony May ● James Parr	● Amie Baca-Oehlert ● Dr. Wendy Birhanzel ● Pamela Bisceglia ● Don Haddad, Ed.D. ● Dan Schaller ● Jen Walmer	● Kathy Durán ● Dr. Rhonda Haniford ● Ted Johnson ● Hon. Rebecca McClellan ● Ryan Marks	● Dr. Rob Anderson ● Alison Griffin ● Tammi Hiler ● Dr. Anne Keke ● Dr. Robert Mitchell	● Lindsey Gish ● Nicholas Hernandez ● Catie Santos de la Rosa ● Mark Sass ● Lisa Yates

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

K. Task Force Considerations and Activities

During its meetings, the Task Force considered essential components of the state's accountability system, past efforts to evaluate the system, and other educational priorities to develop its findings and recommendations. Per H.B. 23-1241, there were four items the task force was required to, or "shall consider" in its deliberations, and an additional eight items it "may review."

Items the Task Force "Shall Consider"

Academic Opportunities or Inequities

Please review the section on [Academic Opportunities or Inequities](#) to learn how the task force considered how existing opportunities and inequities in Colorado's education system impact academic achievement gaps.

Improvements to the accountability system

The task force 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 and gain an in-depth understanding of its elements to consider potential improvements. 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 in schools and school districts

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 these 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.
- 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." 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. The task force then

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.

Items the Task Force "Shall Consider"

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." As previously mentioned, 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." 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.

Task force members also met with CDE's external evaluator of the grant program. The evaluation of the Local Accountability Systems Grant found that the grant successfully helped schools and districts identify additional measures that better reflected the needs of their communities and supported local improvement efforts.

Of note, the Local Accountability Systems Grant is not meant to be an alternative accountability system, but rather a supplemental reporting approach.

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

As noted previously, 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

As noted in the section on promising district and school practices, 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

Lastly, the task force discussed "leading indicators or instructional practices that could be added to the accountability measures." Specifically, they 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.

L. 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."[25] 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 Teach Plus Colorado 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 Teach Plus Colorado 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

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[25] Colorado General Assembly (2023)

the current accountability system on both urban and rural districts, and how the accountability system impacts academic 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 full group 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.

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
- HSD2 admin, staff, parents, and students

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
- Fountain Fort Carson District 8 school leaders
- Campo RE-6 District leadership
- School leaders from elementary and middle schools
- Rural Schools Alliance

Measures Sufficient for Early Grades
- Elliot Regenstein, Foresight Law + Policy
- 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

M. 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 not meant to be an alternative accountability system, but rather a supplemental reporting approach. It 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

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

Lead Applicant	Participating Schools and Districts	Local Accountability System Summary
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		The district intends to support their Reimagine SPF committee in discussing

Schools		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 to 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)	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

	- 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)	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, self direction 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.

N. 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
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.

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

- 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.