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March 13, 2017

To: Dr. Katy Anthes, Commissioner, Colorado Department of Education

The Colorado Education Initiative's (CEI) vision is that every student in Colorado is prepared and unafraid to succeed in school, work, and life, and ready to take on the challenges of today, tomorrow, and beyond. The Every Student Succeeds Act (ESSA) helps Colorado meet this goal by providing resources for our neediest students, while also outlining accountability reporting requirements for schools and districts. Although Colorado state law already supports much of what is required by the new federal law, this is an opportunity for our state to take a hard look at the systems, structures, tools, and partnerships that are necessary to meet the goals of the law, and to ensure Colorado students are receiving the best education possible.

CEI's perspective on policy issues is driven by our ten years of partnerships with schools and districts across Colorado, and our mission to accelerate educational improvement and innovation across the state. Although we don't take a formal role in advocacy or lobbying, our strong, working relationship with key stakeholders uniquely positions us to amplify the voice of the education field in policy discussions. During the 2015-16 school year alone, CEI worked with more than 100 of Colorado's 178 school districts, of all sizes, and from every geographic region of the state. We believe educators – district and school leaders, teachers, and school health professionals – should have a voice in decisions for which they are held responsible, by virtue of their proximity to students, and their intimate knowledge of the opportunities and challenges presented in Colorado's schools each and every day.

It is our honor and privilege to elevate voices from the Colorado education field and to share a point of view shaped by a decade of service supporting districts in implementing sweeping changes in education practice and policy. Based on our work with the field and feedback from educators at the ESSA Summit held in January 2017 in partnership with CASE, CASB, CEA, CBA, and PEBC, CEI has the following recommendations for Colorado's ESSA State Plan and for moving from planning into implementation.

We value the strong, historical partnership we have with the Colorado Department of Education (CDE). We stand ready to support the field with implementation of ESSA requirements, and will continue to focus on innovation, improvement, and results.

Long Term Goals (page 6)

CEI agrees with Colorado stakeholders that long-term targets should be attainable, while also being ambitious. The state plan, however, expresses a long-term goal for some subgroups of students that is lower than their current achievement status. This doesn't represent what we know is the goal of students, parents, educators, and policy-makers in Colorado - that all students, regardless of where they start, show improvement and growth over time. These goals should better reflect students' starting points - low and high - so that they can be more relevant and useful for action planning, and so that schools can have meaningful comparison points. We



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encourage CDE to outline significant commitments to historically underserved students and then work with districts to articulate the specific strategies that will make it possible for students to achieve those targets.

CEI recognizes the difficulty in setting one long term goal for all students. It harkens to the days of No Child Left Behind, when all students, regardless of their starting point, were expected to reach the same goal in the same amount of time.

To meet the requirement of the law and value equity, CEI recommends using different metrics than those proposed in the state plan. In line with Colorado's history of valuing growth as well as proficiency, we might learn from Washington's approach to this issue. A summary of Washington's approach has been prepared by the [Knowledge Works Foundation](#), and is included below.

Washington's Proposed Long Term Goals for Academic Achievement and Graduation

The state proposes using a new achievement goal for long-term improvement goals -- a combination of students meeting/exceeding standards and students on track to meeting standards. The state defines on track as whether a student is demonstrating sufficient growth to reach proficiency within three years or by the 8th grade.

Because learning gaps look different for subgroups and for different schools, the state has created a model for calculating the reduction needed. Each identified group should take the percent meeting standard/on-track and subtract it from 100%. That determines the learning gap. Then, divide that learning gap by 10 to get the annual increment needed to completely close the learning gap. The state's goal is to create annual improvement steps that are ambitious and attainable.

Washington's long-term goals in high school will de-emphasize schoolwide graduation rates, and instead focus on closing gaps in graduation rates by subgroups. Similarly, the goals look to focus on closing gaps between subgroups in proficiency, rather than focus on a schoolwide average. Washington has an extended graduation cohort option of five, six, or seven years.

Stakeholder Consultation (page 10 and throughout the plan)

We commend CDE's efforts to engage with a wide range of stakeholders in the ESSA state plan development process and decision-making. CEI believes that students, teachers, principals, district leaders, and school health professionals should have a strong voice in decisions that impact their students as well as the conditions for teaching and learning. It is our experience that when educators are provided with meaningful opportunities to design systems and strategies in the classroom, at the school or district level, and at the state level, they are more engaged and invested in implementation, and the solutions are often focused on ensuring better outcomes for all students.

The conversations had by the various spoke committees convened by CDE were robust and rich. However, Colorado's ESSA State Plan necessarily captures only a small portion of the ideas, strategies, and supports identified through these conversations. CEI encourages CDE to find ways to continue these conversations with



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the field and use a continuous improvement cycle to make necessary improvements and changes to the state plan or any other state law implicated. This is particularly relevant for school improvement processes and tools that will be developed going forward. As an organization with a history of convening districts from across the state, CEI can offer support in this area, particularly with small, rural districts, and those far removed from the front-range area, as we have strong relationships and partnerships in these areas.

Assessments (page 38)

ESSA provides states with opportunities to consider innovative assessment systems. While the state plan outlines the necessary information to meet the federal law, it is silent on the possible innovations and changes that could be explored in the long term. There are significant technical challenges to transition from our current system to something that's more useful and timely for all stakeholders. Nevertheless, Colorado should prepare to utilize the flexibility that ESSA provides. We understand the rationale behind CDE's current cautious approach to pursuing ESSA's demonstration authority option. However, significant work is going on across the country and in Colorado that should inform a future-facing approach to assessment, including models of performance assessment and approaches that significantly develop the capacity of teachers to use varied means of assessment of, as, and for learning. While CDE works to ensure that our state assessment and accountability systems are compliant with state and federal law, CEI continues to work with the field to study and develop the kinds of assessment and accountability systems that would meet the goals of ensuring all students are well-served while also providing data that are timely, actionable, and relevant to communities and schools. CEI will continue to pursue opportunities to serve as a partner to both CDE and the field toward the goal of ensuring that accountability and assessment in Colorado reflect the needs of all parties, given the unique opportunity to innovate presented under state and federal law.

Indicators: Chronic Absenteeism (page 46)

As the state plan points out, chronic absenteeism has strong links with other key indicators of performance and student success such as academic achievement, an increase in graduation rates, and the lowering of dropout rates. Chronic absenteeism is also a measure that is actionable. It presents schools with the opportunity to develop targeted approaches to ensure students attend school and limit the number of missed days and instructional time. It also requires that schools then have support to improve this measure: successful models from a variety of communities to study and emulate, resources for family and community outreach, and appropriate and useful early warning systems.

As CDE determines the methodology used to evaluate the reduction of chronic absenteeism in elementary and middle schools, we recommend they consult with a diverse group of districts and schools to model the various measurement approaches and to ensure that schools are adequately supported to make use of this new indicator. Some district leaders have expressed concern about addressing this measure when it comes to students with particular circumstances, including the chronically ill, students in foster care, and migrant students. Since many states plan to use this indicator, we recommend that CDE look closely at how other states are defining chronic absenteeism, categories of students who will be excluded from the definition, and how



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particular models of schooling, such as online schools, block scheduling, and competency-based systems, are impacted.

Indicators: Long Term Plan for Including Additional Indicators (page 52)

The ESSA state plan also proposes a long-term approach to consider the use of additional indicators. CEI supports these efforts to establish more comprehensive measures of school quality and non-academic student outcomes. We recommend that the Accountability Work Group extend the timeframe for developing preliminary long-term recommendations to ensure there is sufficient time to gather meaningful feedback from a variety of stakeholders, explore the feasibility of different types of measures, and ensure that recommended measures align to long-term goals for Colorado students.

We hope to have the opportunity to participate in bringing stakeholder voices to this process. CEI has worked with Colorado schools and districts, as well as national partners, to identify and use measures related to student perceptions, school climate, student wellness, and non-academic competencies. We believe that the Accountability Work Group should strongly consider implementation, use, and resources in developing these recommendations. Recommended measures that involve the use of new data collection tools should be feasible for schools and districts to implement, align to clearly articulated goals for student outcomes, and provide meaningful and actionable information to educators, parents, and students. Importantly, they should also align to, but not duplicate, similar measures that schools are already using. For example, student perception surveys are already used in some district educator effectiveness systems. CEI recommends an approach that allows interested districts to pilot measures in this area. We also encourage a robust discussion about the use of a small number of community-selected measures, alongside standard and universal measures, to help schools and districts create a component of their accountability framework that uniquely measures and demonstrates their local commitment over time in some of these additional areas.

Student Subgroups (page 53)

CEI recognizes the challenges in reporting student performance across subgroups while maintaining standards for validity and student data privacy. We also recognize the value of comprehensive student performance data to guide efforts to improve student learning. The proposed combined subgroup approach enables the outcomes of more students in more schools and districts to be included in performance reporting, making their performance more visible while maintaining validity and privacy. While it is ideal to be able to report performance separately for each subgroup, combined group information can serve as a valuable starting point for investigating performance gaps. Combined group information can illuminate gaps that may have been masked previously, prompting educators to review the more detailed student-level data available to them to identify gaps between specific groups of students and then develop plans to close those gaps.

While subgroup reporting plays a critical role in public accountability, its more critical function is to urgently drive an improvement process. To that end, CEI recommends developing some means for districts and schools to easily identify gaps between specific subgroups outside of publicly reported performance data. This might



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include providing confidential reports alongside public reports that include specific subgroup data for those with combined group reporting. Students included in combined subgroups could also be clearly flagged in student-level data sets provided to districts with instructions on creating subgroup comparisons. We also recommend providing guidance and tools to support educators in reviewing and acting on combined subgroup data (including using student level data to identify specific gaps). This analysis should also be incorporated into school and district improvement planning processes, such as Unified Improvement Plans, as well as needs assessments and planning processes for Comprehensive and Targeted Support and Improvement schools.

State Support and Improvement for Low-performing Schools (page 65)

CEI supports the state’s plan to consolidate multiple grant applications, and all efforts to streamline information about funds and programs available for school improvement. Most districts, but particularly small districts with limited grant-management capacity, will benefit from more efficient processes.

CEI recommends that districts and schools identified for school improvement enter first into a planning period. During this time, the district and school, with support from CDE and other partners, will address the foundational strategies needed before implementation efforts commence. This includes a comprehensive stakeholder engagement process (with students, educators, parents, and community members), the collection and analysis of holistic student outcome data, and self-assessments of unique assets, challenges, and existing resources in the community. CEI’s experience partnering with schools and districts on these activities could be leveraged strategically by CDE and the field to bring trainings, tools, and expertise to the planning and implementation phases of school improvement.

As schools and districts work to identify the root cause of low student achievement and create an action plan to increase achievement for all students and close achievement gaps, we recommend the state support this effort by creating and identifying tools and processes that encourage a comprehensive, whole-child approach. In the past 25 years, researchers have documented what educators and parents have always known: students who are physically and emotionally well, present, and engaged are better learners. The strongest examples of successful “turnaround schools” target both academic and culture improvements in tandem. Therefore, when schools and districts create school improvement plans, they should be supported to understand the holistic needs – physical, mental, social and behavioral - of their students, educators, and families. Needs assessments, root cause analysis tools, and Unified Improvement Plans, for example, should be modified to encourage the collection and use of health and wellness data. Many schools in Colorado collect and use data that pertains to student health, or school-based health and wellness policies and practices. Many districts also use school climate surveys, student or parent surveys, or student and teacher perception surveys - tools that help expand and more effectively target the needs of local communities and targeted student populations.



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Final Thoughts

Complying with federal law isn't often considered a space ripe for innovative thinking or strategies. However, CEI continues to assist the field in using more innovative approaches to solve the big challenges our education system faces. New approaches are necessary if we want to move toward a system in which more students have more opportunities to succeed both in the K-12 educational system, and beyond. Bold improvements to student assessment and to accountability systems will require all stakeholders to develop a deeper understanding of the opportunities and limitations of existing measures, and invest time and energy to explore how to measure student outcomes that are difficult to standardize but often far more predictive of long term success. In these cases, and others, CEI is ready to stand in partnership with CDE and the field to move this important work forward.