

<b>Comment/Question on Proposed AEC Framework Requirements</b>	<b>CDE Response</b>
How often could an AEC change its selection of common and/or common measures?	The Department’s intention is to initiate and foster a process of research, development and continuous improvement, and encourages the ongoing effort to develop rigorous measures that are well-calculated to capture the performance of Alternative Education Campuses. Thus, the Department anticipates that it will permit AECs to adjust selection measures on an annual basis. However, the Department also encourages AECs and districts to carefully evaluate the value of any adjustments to their frameworks, as consistency and stability from year to year are critical to gauging progress over time.
What workforce readiness common supplemental measures are being used by districts?	Graduation rates, successful transitions, post-completion success, and credit/course completion rates are all common supplemental measures that could be used by districts. For more information, see “Supplemental Accountability Measures for Alternative Education Campuses.”
There is not enough time between the October 1 deadline for providing initial plan type assignments to districts and the October 15 deadline for districts to submit a Request to Reconsider	The request to reconsider process involves making a case to CDE that a district or school should receive a different plan type based on supplemental evidence and progress towards implementation benchmarks. Since districts submit their AECs’ selection of supplemental measures and local data by July 1, and CDE will approve the supplemental measures by September 1, it’s likely that CDE will have already factored this additional information into its determination of a district’s/school’s initial plan type. The district is also encouraged to submit the plan type it believes the school should receive when it submits the selection of supplemental measures and local data. As such, a request to reconsider should not be necessary, especially if the district is engaged with CDE throughout this process. In all cases, the Department will make an effort to share initial plan types with districts as soon as the analyses are available, but will keep the October 1 date as the goal for a release of preliminary AEC framework reports.
Why are school performance data for AECs published in the traditional CDE school performance framework? Shouldn’t this be published within the AEC framework?	Traditional school performance frameworks will be issued for all public schools in the state in order to allow a consistent and uniform view of school performance. The AEC frameworks will also incorporate the statewide performance measures, where available. This is required by 22-11-503, which states that “the department shall publish on the data portal a school performance report for each public school in the state,” and 22-11-503(2), which states that school performance reports must include “the report subject’s levels of attainment on each of the performance indicators.”
Shouldn’t schools with an adult education mission be classified in the same category with multiple pathways?	This distinction in AEC type has been used only for research and development purposes. It helped to organize stakeholder groups and to analyze differences across AEC types in the preliminary data analyses. These categories will not factor into plan type assignments moving forward.

<p>The proposed targets for growth percentages seem very low. How do we know that is an appropriate place to set the bar? Should growth expectations be very similar to expectations for growth in traditional schools?</p>	<p>The targets are based on the distribution of current AECs across the state, and sets high expectations within that distribution—the meets criteria for AECs is set at the 60<sup>th</sup> percentile while the meets criteria for traditional schools is set at the 50<sup>th</sup> percentile for all schools. Additionally, emerging research by Dr. Jody Ernst, conducted both within Colorado and across six other states, suggests that high-risk students do not grow at the same rate as traditional students. Based on this research and feedback from stakeholders, the Department has determined these targets to be appropriate for this set of schools.</p>
<p>The proposed measures for the postsecondary and workforce readiness category do not include graduation rates. 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> year rates should be included as measures of performance.</p>	<p>Districts and schools have provided feedback to the Department indicating that graduation rates are not appropriate measures for some AEC schools, and that completion rates are more appropriate measures. This is true, for example, for those AECs that have a mission to transition students back into a regular education setting or that have a mission to support overage and undercredited students in receiving a GED diploma. However, districts may choose to use graduation rates in their AEC frameworks either in place of or in supplement to completion rates, and the Department encourages districts to do so where appropriate.</p>
<p>More weight should be given to achievement. What kind of message are we sending to schools if we only value achievement at 10 percent?</p>	<p>The framework requirements will be adjusted to include the following weights for high schools:  Achievement: 15%  Growth: 35%  PWR: 30%  Student engagement: 20%</p>