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Design Needs that remain:

Cover page

Logos

Section headers

Tables or call out boxes if needed

Finalize page numbers once document is complete

First Full Draft of Final Report: Colorado Accountability, Accreditation, Student Performance and Resource Inequity Task Force

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DRAFT

I. Introduction

A. Letter from the Chairs

Dear Reader,

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

Over the course of 15 full task force meetings, 25 additional small group meetings between members studying various elements of the accountability system, and various stakeholder engagements, this task force 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 department of education—shares our rigorous learning along with [##](#) recommendations. The recommendations—prepared by a diverse set of seasoned and passionate education stakeholders appointed by the state’s legislature in a bipartisan way—will enhance Colorado’s Education Accountability System, with the ultimate goal of improving opportunities and outcomes for all of Colorado’s students.

Underpinning the task force’s recommendations are the following core values:

- Evidence and rigorous analysis, rather than opinions, should inform this task force’s approach to developing recommendations
- All recommendations in this report should be weighed by multiple perspectives, helping ensure they address the needs of Colorado’s diverse student body and school communities
- Recommendations should ultimately serve to preserve what is working and address inequities between students, making the accountability system a true roadmap for improvement across schools

We ask for your feedback on these values in the guiding values section below: V.A.

¹ [Colorado General Assembly](#) (2023).



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We want to thank all 26 task force members for their dedication to our charge and their steady commitment to this work since August 2023. They joined this task force with a wide 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 Centennial State. And by exploring, listening, compromising, and developing recommendations—together—we believe the State is well positioned to improve our education accountability system to the benefit of all of Colorado’s students using these recommendations as a guide.

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

Sincerely,

Dr. Wendy Birhanzel and Hon. Rebecca McClellan

1241 Task force Chair and Vice Chair

B. Executive Summary

Forthcoming

DRAFT

II. Task Force Charge and Membership

A. Task Force Charge

Per H.B. 23-1241, the Colorado Accountability, Accreditation, Student Performance and Resource Inequity Task Force was created “to study academic opportunities, inequities, promising practices in schools, and improvements to the accountability and accreditation system.”²

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

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

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

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

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

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

B. Task Force Membership

There are 26 members on the task force. The Speaker of the House of Representatives appointed the Chairperson, Dr. Wendy Birhanzel, and the President of the Senate appointed the Vice Chair, Hon. Rebecca McClellan. The remaining 24 members were appointed by the Speaker of the House of

² Ibid.

Representatives, the President of the Senate, the House of Representatives Minority Leader, the Senate Minority Leader, the Governor, and Colorado Department of Education (CDE), as outlined in the statute.

The task force is made up of a bipartisan, geographically diverse set of education stakeholders. Through their work, they represent the points of view of superintendents, principals, teachers, parents, students, advocates, and communities across the state.

A full list of task force members, what stakeholders they represent, and who they were appointed by can be found in Appendix C.

III. Background

A. Overview of Colorado’s Education Accountability System

Colorado’s Education Accountability System is designed to “(a) provide valid and actionable information regarding the progress of all students toward meeting academic standards and (b) prioritize support for schools and districts identified for improvement.” On an annual cycle, districts are issued performance ratings which help identify high-performing districts and schools to disseminate best practices, and low-performing schools and districts to offer direct additional resources and support or initiate corrective action if low performance persists over time.³

Colorado’s Accountability and Accreditation System consists of the following elements:⁴

- **Performance Frameworks:** Performance frameworks provide a statewide evaluation of student performance using indicators based on academic achievement, growth, and postsecondary workforce readiness data. CDE uses the points earned through the performance frameworks to assign schools and districts ratings. Schools receive plan types and districts receive accreditation ratings. The following table defines what each of the three framework indicators consists of and what weight each indicator has on the performance frameworks at the elementary, middle, and high school and district levels.

Performance Indicator	Performance Data Included	Weight
Academic Achievement	<ul style="list-style-type: none"> ● Mean scale score ● English language arts, math, and science assessments ● Overall and for disaggregated groups 	<ul style="list-style-type: none"> ● 40% for elementary and middle schools ● 30% for high schools and districts
Academic Growth	<ul style="list-style-type: none"> ● Median student growth percentile 	<ul style="list-style-type: none"> ● 60% for

³ [HumRRO](#) (2022).

⁴ [Colorado Department of Education](#) (2023).

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	<ul style="list-style-type: none"> English language arts, math and English language proficiency assessments English language proficiency on track metric Overall and for disaggregated groups 	<p>elementary and middle schools</p> <ul style="list-style-type: none"> 40% for high schools and districts
Postsecondary and Workforce Readiness	<ul style="list-style-type: none"> SAT Evidence-based Reading & Writing and Math Graduation rate Dropout rate Matriculation rate (includes military enlistment) Industry credentials, included in career and technical education and overall matriculation rates calculations Overall and for disaggregated groups (except for Matriculation rate) 	<ul style="list-style-type: none"> 30% for high schools and districts

- **Public Reporting:** Public reporting includes interactive data visualizations and reports using accountability system data. These publicly available reports offer results from the application of accountability frameworks and beyond. For example, they include data over time on enrollment, demographics, achievement, growth, and postsecondary workforce readiness.
- **Improvement Planning:** Building on a continuous improvement approach, schools and districts have multiple state, federal and grant improvement planning requirements and receive support with their performance management efforts. Appropriate resources are matched to their needs.
- **Public Engagement:** All schools and districts are required to have accountability committees, which provide recommendations to principals and local boards.
- **Supports and Interventions:** The state offers supports and resources through the State Support System to schools and districts that are on or are approaching the accountability clock. Supports are matched to meet local needs, and can include CDE staff support and the Empowering Action for School Improvement (EASI) grant. The state’s needs assessments drive the State Support System, and supports are distributed using universal, targeted, and intensive tiers. District participation in the State Support System is voluntary, but encouraged.
- **Accreditation:** The state board is responsible for the annual accreditation of districts based upon performance frameworks and other provisions. These provisions are related to budget and financial policies and procedures; accounting and financial reporting; school safety and the Gun Free Schools Act; and the periodic review and adoption of curriculum standards that meet or exceed state standards. The state board also assigns plan types to each school, but ultimately local Boards of Education have the authority to accredit schools.
- **Awards:** Schools and districts can receive state awards for exemplary performance, for example on academic achievement or growth scores.

IV. Task Force Activities

A. Task Force Meeting Cadence and Structure

From August 2023 to November 2024, the full task force met 15 times and in small groups 25 times 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. A detailed summary of this work can be found in the [Interim Report](#), shared with the legislature on March 1, 2024. In February, 2024, the task force began 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 accountability system and what they should address with their recommendations	Presentations from: <ul style="list-style-type: none"> • 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 began considering the challenges, opportunities, and observations associated with each element of the accountability system, and recommendations, as necessary, to address these challenges and opportunities	<ul style="list-style-type: none"> • Task force members divided into study groups to consider in greater depth elements of accountability system and begin developing recommendations • 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 task force's work was completed in November, 2024, with the delivery of this final report to the legislature.

Education First Consulting 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.

B. Task Force Considerations and Activities

In line with H.B. 23-1241, the task force considered essential components of the educational accountability system, past efforts to study the state's accountability system, and other educational priorities to study the accountability system and develop recommendations.

Academic opportunities or inequities

Per the statute, the task force was required to consider "academic opportunities or inequities that may impact academic achievement gaps." Though this report offers recommendations to improve the accountability system to advance academic opportunities and inequities, the task force strongly believes the accountability system alone cannot advance academic opportunities or prevent academic inequities. More must be done outside of the accountability system to ensure every Colorado student attends a school with high-quality teachers, strong curriculum and instruction, adequate funding, strong governance, modern, safe and welcoming facilities and transportation, and strong family and community supports. One critical way to advance academic opportunities and address academic inequities is through the allocation and effective use of resources.

During its meetings, the task force generated a list of academic opportunities and inequities. While developing the list, many task force members noted that the presence of a certain resource results in an "academic opportunity" while the absence of the same thing results in an "inequity." Therefore, they decided to consider the opportunities and inequities as one list of "resource categories." The final list of resource categories the task force generated include:

- **Personnel:** Includes high-quality, well trained and experienced staff that have the 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 Individualized Education Plans (IEPs) and students that have unfinished learning.

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- **Curriculum and Instruction:** Includes 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.
- **Funding:** Funding that provides adequate access to resources and helps meet priorities; includes grants, state and federal funding, donations and fundraising, and community or private partnerships.
- **Governance:** Includes 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 the needs of their students' particular needs.
- **Facilities and Transportation:** Students have access to high-quality facilities and transportation that allow them to access resources and supports. This includes quality facilities in good repair that are accessible to all.
- **Family and Community Supports:** Schools have access to external assets including strong culture, community school models, parent/family engagement and support from postsecondary and business.

Improvements to the accountability system

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

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

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

Promising practices

Per the statute, the task force is also required to consider “promising practices in schools and school districts” in its deliberations. Throughout its work, the task force reviewed the following promising practices:

- After developing an initial list of academic opportunities and inequities that may impact academic achievement gaps, the task force generated examples of how districts or schools successfully mitigated identified inequities. These practices served as examples of how students can have equal access to academic opportunities.
- CDE shared background information and framing on the School Transformation Grant Program. This presentation shared what kind of interventions can successfully 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 could be relevant to the 1241 task force’s own deliberations and recommendations to the accountability system.
- CU Boulder and the Center for Assessment presented information to the task force about other state’s accountability systems, which were meant to help the task force review other states’ approaches to accountability. The presenters also offered a list of design elements the task force could consider including in Colorado’s accountability system.
- CDE shared with the task force information on the Local Accountability Systems Grant, which grants “money to local education providers that adopt local accountability systems to supplement the state accountability system.” Local accountability systems offer another avenue to hold schools and districts accountable for student outcomes, while honoring the unique contributions these schools and districts offer their school communities.

Recommendations for legislation or rules

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

- Impact of N-size on Performance Frameworks
- Recognition of Trends Between Similar Groups of Students
- Assessments Used for Accountability Ratings
- Measures Sufficient for High School
- Measures Sufficient for Early Grades
- Public Reporting and Engagement
- Improvement Planning

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- Supports and Interventions
- Awards
- Accreditation
- Participation and Opt Out

The Audit

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

Local accountability system grant

The task force also had the option to review “the results of the local accountability system grant program created in section 22-11-703.” At the April 2, 2024, meeting, CDE gave an overview of the [Local Accountability Systems Grant](#), which grants “money to local education providers that adopt local accountability systems to supplement the state accountability system.” Task force members also met with CDE’s external evaluation of the grant program, Robert Reichardt. The presentation can be found on the [CDE website](#).

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

Results of school transformation grant program

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

Interim and final reports from 1215 Task Force

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In its deliberations, the task force also considered the “interim and final reports from the secondary, postsecondary, and work-based learning integration task force created in part 2 of article 35.3 of title 22.” At the January 9, 2024, meeting, representatives of the 1215 task force shared their final recommendations and process for stakeholder engagement. Part of their recommendations focused on the accountability system’s Postsecondary Workforce Readiness (PWR) indicator, which was relevant to the 1241 task force’s efforts. All of the 1215 task force’s recommendations can be found in the [Secondary, Postsecondary and Work-based Learning Integration Task Force Report](#).

Promising practices from other states

In its deliberations, 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. At the January 17, 2024 meeting, CU Boulder and the Center for Assessment presented on Oklahoma’s, Michigan’s, and California’s accountability systems, highlighting ways states approach accountability differently, and ways in which states share common approaches. The presenters also offered a list of design elements they emphasized are critical to any accountability system.

Leading indicators or instructional practices

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

C. Stakeholder Consultations

Stakeholder consultations were conducted in three primary ways: (1) panels conducted during task force meetings with fellow task force members, teachers, and parents; (2) a public comment survey disseminated in both English and Spanish, and (3) 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

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ability to advance academic opportunities and address inequities. Task force members shared their experiences in one of three groups: rural school systems, large school systems, and school systems that serve high percentages of diverse students. These panels allowed the task force to tap into the expertise and experience of their fellow members and incorporate these perspectives in their findings and recommendations.

At the April 2024 meeting, the task force hosted a conversation with teachers from TeachPlus and the Colorado Education Association (CEA). Teachers affiliated with these organizations offered the task force additional insight into educators' experience with the current accountability system, and when possible, on the issues currently under consideration by the task force. The teachers from TeachPlus shared findings and corresponding recommendations from their research on what teachers across the state believed the purpose of education should be and what constitutes a high-quality school. They also offered examples of how other states measure school quality and student success through other state accountability systems. The representatives from CEA shared the impacts of the current accountability system on both urban and rural districts, and how the accountability system impacts academic 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). These parents represented students in larger school systems, charter schools, rural/and or smaller school communities, and students with disabilities. 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 and the other 1,224 had only partial information limited to personal background but with zero response to the survey questions (i.e., stakeholder type, region of the state).

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.

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

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

Task force members were also instructed to conduct consultations with external stakeholders to gather further feedback on the accountability system. The facilitators provided task force members with a template to conduct these consultations, and task force members conducted them between official task force meetings in either publicly-scheduled task force meetings or in individual settings. Task force members were asked to share notes from these consultations with the full task force to facilitate cross-task force information.

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

Impact of N-Size on SPF Ratings

Recognition of Trends Between Groups of Students

Assessments Used for Accountability Ratings

- CDE Chief Assessment Officer
- CDE Commissioner of Education

Measures Sufficient for High School

Measures Sufficient for Early Grades

- Elliot Regenstein

Public Reporting and Engagement

Improvement Planning

Supports and Interventions

Awards

Accreditation

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Participation and Opt Out

These are the stakeholder consultation notes we have; please indicate what study group topic they informed

- 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
- Pueblo 60 District Accountability Committee members
- Higher Education Subject Matter Experts in Multilingual Education—HELDE group

D. Task Force Consensus Process

To develop the findings and recommendations outlined in this report, at the start of 2024, task force members organized into “study groups” focused on various aspects of the accountability frameworks, other elements of the accountability system, and additional topics relevant to the task force’s charge that were raised during task force meetings and deliberations for further study. Task force members were assigned to study groups based on interests they expressed in a survey administered by the facilitators. Task force members spent significant time in their study groups during and between monthly task force meetings to share their observations, study the challenges and opportunities, conduct stakeholder consultations, and develop recommendations, as necessary, on their assigned study group topic.

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. Task force members also received research and analysis support from CDE, as the statute allowed for CDE support to carry out task force work.

This process repeated over and over with task force members taking feedback and making adjustments 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)*

V. Findings and Recommendations

A. Guiding Values

The recommendations that follow are designed to enhance what is already working for Colorado students and educators, and address ways Colorado’s system of accountability can further advance academic opportunities and address inequities.

Throughout the task force’s deliberations, members held themselves accountable to a set of guiding values that resulted in evidence-supported, stakeholder-informed, and equity-centered recommendations for Colorado students. They upheld these values when studying multiple components of the accountability system’s performance frameworks and other elements of the accountability system, elevating resource inequities, and considering additional topics raised by the task force or stakeholders through the stakeholder engagement process. These guiding values are:

- Evidence and rigorous analysis, rather than opinions, should inform this task force’s approach to developing recommendations
- All recommendations in this report should be weighed by multiple perspectives, helping ensure they address the needs of Colorado’s diverse student body and school communities
- Recommendations should ultimately serve to preserve what is working and address inequities between students, making the accountability system a true roadmap for improvement across schools

Education First compiled these based upon stated task force values and things we heard said in meetings. Please provide feedback if this is not a value the TF holds. Also, do we need to define what we mean by “values”?

B. Impact of N-Size on SPF Ratings

Opportunities, Challenges, and Observations

This task force believes that Colorado’s accountability system, particularly its performance frameworks:

- should provide transparent academic data for all students, disaggregated by subgroup, to help districts and the state use data to target supports and highlight best practices;
- should weight students’ assessment scores equally, to the extent possible; and
- produce reported data that is valid, reliable and comparable between schools and districts.

Do these values move into recommendation language?

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A small student n-size can impact the accountability system's ability to meet these conditions. N-Size is the minimum number of students required to form a subgroup, as defined by the Every Student Succeeds Act (ESSA). This number is used for federal reporting and accountability, and states can choose an n-size as low as 10 students. Small n-size can occur in districts or schools with small overall student populations, or districts or schools with small subgroups of student populations. Studies have shown that small n-size disproportionately masks results of free/reduced-price lunch eligible students, students of color, multilingual learners, and students with an Individualized Education Program (IEP), which can cause these students to become lost in the system and not get their needs met. (citation needed) Additionally, the public does not see the full picture of how a school is performing in supporting these students if no data is able to be reported.

If a school or districts' student population or one or more subpopulations does not reach these n-size thresholds, that data will be suppressed in reporting to protect student privacy. These size thresholds have been determined by CDE policy. Other states use lower thresholds (e.g., Texas uses $n \leq 10$) and some states use higher thresholds (e.g., #####).

CDE's current public reporting thresholds for small systems in the frameworks include:

- At least 16 students must have state assessment data for academic achievement ($n \leq 16$)
- At least 20 students must have state assessment data for academic growth ($n \leq 20$)

One way CDE works to generate reports for as many school sites as possible is by aggregating data over a three-year period for small schools and districts to generate multi-year frameworks. However, some schools and districts still do not have reportable data for all performance indicators, and are assigned Insufficient State Data (ISD) ratings. In 2023, using preliminary frameworks, 32 districts were assigned an ISD rating.⁵

The impact of small student n-sizes is particularly salient for subgroups of historically underserved students and small, rural schools and districts.

Disaggregating results for subgroups of historically underserved students is extremely important so that these students are not lost in the averages. However, it is challenging to ensure these smaller subgroups receive adequate attention and analysis, especially when they fall below CDE's public reporting thresholds. When the n-size for a subgroup falls below CDE's reporting thresholds, the subgroup data are not only suppressed, but are also not included in the school or district's performance score. This then masks these students' results behind the overall performance of the school or district. In addition, if a subgroup just reaches CDE's n-size threshold, this group will still account for the same amount of points in the performance frameworks as another subgroup that is many times larger.

⁵ [Colorado Department of Education](#).

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Additionally, the “students with disabilities” subgroup is not necessarily reflective of all students with disabilities in that school. When a student is moved off an IEP, they are no longer included in the “students with disabilities” subgroup even though they may still have a disability and receive accommodations. The result, however, can actually cause the “students with disabilities” subgroup score to decrease because those students’ assessment scores are no longer included, and can impact the accuracy and interpretation of that subgroup analysis.

Small n-sizes also pose a challenge for rural schools and districts, which are impacted differently by the accountability frameworks due to lower enrollment numbers. The volatility caused by low student numbers, where even a single student can significantly affect overall performance scores, creates a margin of error and an inequitable comparison of district, school and grade level outcomes. Effectively, in these smaller schools and districts, individual students’ assessment scores are weighted more heavily than those of students in large urban districts.

Recommendation(s)

Recommendation #1: Create a "super subgroup" by grouping together smaller subgroups of students to ensure they meet the n-size threshold for reporting academic growth and achievement. This would help make sure more historically underserved students are included in reporting and a district or school's framework rating, within districts where those students make up an n-size that falls below CDE's n-size limit.

The task force also recommends that students that have ever been exited from an IEP or a non-medical 504 plan be included in this group, because while they may no longer be on a plan, they still have a disability. This ensures a more accurate representation of students with disabilities and prevents fluctuations in subgroup scores due to changes in enrollment status. *The study group is seeking task force feedback on under what conditions a student should still be counted in the “students with disability subgroup.” Should they be counted through graduation? Should it differ for type of disability? What is considered a non-medical 504 plan?*

Also see this recommendation’s overlap with Trends recommendations #1 and #2.

By combining smaller subgroups and including previously exited students, Colorado can achieve a more comprehensive and stable representation of student performance, making sure to include in reporting the results for students who are historically underserved.

This study group is particularly seeking task force feedback on recommendations 2–6, i.e., detail and specificity of the rec, content of the rec, who the rec should be directed to

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Recommendation #2: Explore how the state could equalize the weight of each individual student such that the accountability system reduces the oversized impact individual students have on small systems.

Recommendation #3: Explore how the state could compare schools with similar characteristics and calculate a median growth percentile, similar to how individual student comparisons are made. This potentially could provide a fairer reflection of student performance. This “similar schools” measure would not supplant current statewide indicators but could add points to a framework to account for performance as compared to similar schools.

Recommendation #4: Leverage the request for reconsideration process for accountability ratings proactively, allowing small schools and districts to address potential issues before preliminary scores are finalized. This could include permitting the small school or district to use the alternative accountability framework that AECs use if the school or district does not have enough data for a rating.

Recommendation #5: Explore combining data from two or more small schools that have an ISD rating. With the increased count, issue a performance rating based on the combined data of the small schools. [Texas](#) ([can we give a direct link to the relevant section?](#)) is an example of a state that uses such methodology.

Recommendation #6: CDE should study the possibility of an entirely alternative accountability process specifically tailored for small and rural districts that accounts for local factors and trend data, ensuring ratings are assigned with context while minimizing the burden on rural areas. Recommendations for operationalizing this concept include defining criteria for similarity between schools and districts to ensure fair comparisons. Development of proactive review processes and local accountability systems should involve collaboration with stakeholders to ensure effectiveness and minimize unintended consequences, specifically not setting a lower bar for certain schools or districts. Additionally, local dashboards can be a useful tool to reflect measures important to local communities and help give parents more context for volatility in smaller districts. Including a contextual statement sharing the true margin of error on the state framework is another option.

By addressing these challenges and leveraging learnings from local accountability work such as the [Student Centered Accountability-Process](#) (S-CAP), an alternative accountability framework can better serve the unique needs of rural schools and districts.

Note: This recommendation is in conflict with assessment recommendation #2.

Also see Measures for High School recommendation #5 and Public Reporting and Engagement recommendation #8 for another mention of local accountability systems.

C. Recognition of Trends Between Groups of Students

Opportunities, Challenges, and Observations

Colorado's education accountability system is based on the belief that every student should receive an excellent education and graduate ready to succeed. This task force believes:

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

This task force investigated how student demographics may ultimately impact the assignment a school or district receives under the accountability system's frameworks. Currently, points are distributed for academic achievement and academic growth on assessments for all students and for the performance of individual subgroups, including free/reduced-price lunch eligible students, students of color, multilingual learners, and students with an IEP. Because students can belong to more than one of these subgroups, their assessment data may be scored and considered for points under the performance frameworks multiple times, thereby increasing the weight of their assessment scores. On the other hand, this framework approach can also allow a school or district to mask subgroup performance behind all students' performance. For example, when a school or district is less diverse, their n-size of subgroup participation is not large enough to have an impact on overall scoring, and so important information on historically underserved populations can be masked. Likewise, if a subgroup's n-size does not reach CDE's reporting thresholds, that subgroup's assessment scores won't be counted at all in the overall scoring on the school or district's performance frameworks. The group explored the possibility of an equity indicator and other systems of comparing like populations and determined that these approaches may make the accountability system more complicated and less transparent.

There is a great deal of overlap with the n-size group. TF consider consolidating, and in which section does this information belong.

CDE shared data that demonstrated a range from weak to high correlations between student demographics and plan type assignments for school improvement through the performance frameworks. For example, the data reported very weak to no correlations between student subgroups (multilingual learner, poverty, etc.) and growth. CDE reported a moderate relationship between achievement and some identified student characteristics. Specifically, there was a high correlation between free and

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reduced-price lunch eligibility and achievement scores. However, some of the results may be impacted by other factors such as low participation rates, opt-outs, insufficient data, and requests to reconsider.

One modification to the accountability system that could reduce the impact of student demographics on plan type assignments is through the creation of a combined subgroup for scoring framework points in both growth and achievement. The combined subgroup would represent a distinct count of students falling into one or more of the individual subgroups including free/reduced-price lunch eligible, students of color, multilingual learners, and students with an IEP. This means that even if students belonged to more than one of these subgroups, they would only be counted once for scoring framework points. Scoring for all students in a school or district would continue as is.

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

Less than 40% poverty concentration	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

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

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

- Decreases correlation of plan type assignments to student demographics by only counting academic achievement and growth of students in a separate subgroup once;
- addresses perceived “penalty” for serving historically underserved students that is caused by repeated counting of assessment scores for students who fall in multiple subgroups;
- ensures that important disaggregated data is reported accurately;
- increases the number of schools that meet the minimum n-count required to be held accountable for disaggregated student groups, providing more information for small systems;

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- ensures that a consistent measurement is used to recognize the performance of individual students who are classified in one or more disaggregated groups;
- ensures that this change does not exacerbate the ability of a large, less-diverse district to mask the performance of disaggregated groups.

The data did confirm that there is a modest impact on the rating system when the combined subgroup approach is used. It is important to know that the results and ratings may also be influenced by other factors such as opt-outs, low participation, insufficient data, and requests for reconsideration. In the absence of these factors, the impact may be more significant than modest.

In addition to studying the broader influence of student demographics on plan type assignments, the task force also considered how the counting of students with disabilities impacts the way points are distributed under the performance frameworks. 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 enjoy additional protections under the Individuals with Disabilities Education Act (IDEA). For students eligible under the IDEA, special education programming is designed to teach the student compensatory skills so that they no longer meet the eligibility criteria under IDEA. Although the student may no longer be eligible under IDEA, the student continues to have a disability and is eligible for accommodations, modifications and services under Section 504 to access academic, non-academic and extracurricular activities. Finally, some students may not be eligible under IDEA, but have an impairment that impacts access and participation in the academics and is designated as a student with a disability identified under Section 504.

In Colorado's accountability system, only students eligible under IDEA are counted in the students with disabilities subgroup. This means that when students no longer meet the criteria for IDEA, they exit this subgroup. Some perceive this as penalizing schools who help students move off of IDEA eligibility, (not counting this student's higher achievement in that subgroup), and that because these students still have a disability and are eligible for accommodations, they should be considered in the performance framework subgroups.

The section on students with disabilities has overlap and dependencies on other sections—we may need to link to other sections or consolidate. Please consider where this overlapping information should reside.

Lastly, the task force considered the state accountability procedures for determining when a district merits a distinguished rating and whether those procedures align with the values defined by the group. Currently, districts with low levels of participation on state assessments can still receive a distinguished rating. Similarly, schools and districts with overall high growth and achievement scores but low scores for certain subgroups can also receive a distinguished rating. This practice effectively masks subgroup results behind a school or district's overall performance.

To better align the awarding of a distinguished rating with the task force's values, the group considered a new set of common business rules that must be met to receive the distinguished rating. These include:

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- Total participation rates on assessments must be at least 85 percent
- The “all students” group receives a rating of at least “meets” for academic growth
- The “all students” group receives a rating of at least “approaching” for academic achievement
- No individual subgroups receive a rating of “does not meet” for academic growth

The task force asked CDE for a complete list of currently distinguished districts and how those district’s ratings might change when applying above business rules. 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 singular 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.

This section on distinguished ratings also has overlap with other sections to consider—in awards, or here.

Recommendation(s)

Recommendation #1: The accountability system should adopt a combined subgroup approach for achievement and growth scores when determining school and district ratings. This means only the all student group and combined subgroup would be scored for points on the framework. This will ensure that scores for students included in multiple subgroups will not be counted multiple times toward a school and district’s rating in the accountability system. Schools should still continue to report student achievement and growth results across multiple subgroups, even where students may be assigned to multiple categories, because disaggregated data is critical to closing gaps between students. *Feedback needed from task force: does this recommendation fit better under trends or n-size group? It is the same as n-size recommendation #1.*

Recommendation #2: Designation of a student with a disability under the performance frameworks should include the combined count of students identified under IDEA and students having an academic impairment under Section 504. Specifically, when a student is no longer eligible as a student with a disability under IDEA, but is found to have an educational impairment under Section 504, that student will continue to be designated in the disability subgroup. In addition, when a student is no longer eligible as a student with a disability under IDEA, that student will continue to be designated in the disability subgroup for four additional years. This is similar to how multilingual learners are counted. This will help ensure Colorado acknowledges that a student who moves off an IEP still needs support, and that a school or district is not penalized for moving a student off an IEP. *Feedback needed from task force: Does this recommendation fit better under trends or n-size group? It is similar to n-size recommendation #1. Study group is also seeking feedback on exact rules around when and under what*

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circumstances students should be counted in the “students with disabilities” subgroup as well as if doing this could have the unintended consequence of masking the performance of students with disabilities with higher performing students with 504s.

Recommendation #3: The Colorado Department of Education should implement business rules following framework scoring to ensure a district is only awarded the designation of distinction if they meet the below criteria. This will help schools and districts remain focused on closing gaps between student groups. *See overlap of this recommendation with Assessment recommendation #11, Awards recommendation #5, and Participation and Opt Out recommendation #1*

- The student participation rate on state assessments is at least 85 percent. This percentage should encompass only those students whose parents’ did not formally opt them out of the assessment. *Feedback needed from task force: should the 85 percent be out of all enrolled students or only those students whose parents did not formally opt them out? And is 85 percent the right number?*
- The “all students” group receives a rating of at least “meets” for academic growth
- The “all students” group receives a rating of at least “approaching” for academic achievement
- No individual subgroups receive a rating of “does not meet” for academic growth

D. Assessments Used for Accountability Ratings

Opportunities, Challenges, and Observations

Within the 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.

To consider the role assessments play in Colorado’s accountability system and how changes to these assessments might positively impact the accountability system, the task force identified a common set of understandings or values to guide its deliberations on this topic. These values included the following:

- It is important that assessments are aligned to state standards;
- assessment results should be reported in a timely and transparent manner;
- evolving technology should play a role in future iterations of the assessment system; and
- assessments serve different purposes for different stakeholders.

In addition to these values, the task force studied how other states developed and utilized assessments within their accountability systems, and also the potential role local assessment data could play as a component of the accountability system.

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State assessments play a critical role in the state accountability system and changes to the 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. 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. These conversations and the background information gained informs the subsequent observations and recommendations. 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.

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

The Innovative Assessment Demonstration Authority (IADA) pilot accountability system presents 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.

Adaptive assessments present another 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 more accurately measure individual student growth related to standards. 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

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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 reduce test taking time. Changes to the CMAS assessment in prior years reduced the total time spent on the assessment and prevented the state from reporting a writing subscale score. Adaptive assessments, or other assessment innovations may allow additional reporting of information 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 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.

There is also an opportunity to expand assessment accessibility for all students, though there may be a particular benefit for multilingual learners and students with disabilities. For multilingual learners, currently the CMAS assessment is available in only English and Spanish. 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 be different. For example, language acquisition research points to the need for students to have access to 4–5 years of instruction before reaching grade level proficiency. Considering newcomers' age and developmental stage when they arrive in Colorado will be critical to determining a student's ability to access both language and content of their grade level assessment at a given point in time.

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

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 systems. 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

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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?

Lastly the task force discussed reporting, specifically access to and transparency of data. The group spent time considering how different stakeholders, including parents, students, school and district administrators, teachers, and the community, may engage with the assessment data and what information they may want in a transparent and accessible way. The task force discussed the possibility of making available individual results to students and their families ahead of school and district reports (similar to what currently happens with the College Board assessments) that often require more time to put into an accessible and meaningful format. Preparing reports that are customized to stakeholder groups, including the development of supporting tools, could help different stakeholders access the accountability information in a user-friendly way. A “search” option could also help stakeholders find information in an efficient and meaningful way. For example, a parent might be interested in reviewing schools that have literacy programs to support students with characteristics of dyslexia.

This previous paragraph may overlap with the reporting section. Feedback needed here.

Recommendation(s)

Recommendation #1: Continue to use a standards based state assessment.

Recommendation #2: Maintain a singular state accountability system. Do not pursue Innovative Assessment Demonstration Authority (IADA) as demonstration authority requires a bifurcated accountability system. *In conflict with N-size recommendation #6.*

Recommendation #3: Make the CMAS assessment adaptive as permissible under the current ESSA requirements (for example, cover only content assessed in the students current grade-level) to

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decrease testing time similar to the current PSAT/SAT assessment. In addition, consider an adaptive CMAS assessment that may span more than one grade level so that student data results indicate which grade level the student met the grade level expectations. This likely would require a waiver from the US Department of Education if the adaptive CMAS covers grade levels below the original tested grade level, i.e., a fifth grade student takes adaptive assessment that covers standards within grades 4 and 5. Also consider how adaptive assessment technology might enable the state to add back the writing subscore to state assessment reporting.

Recommendation #4: Eliminate the paper-based testing option for the CMAS assessment (like the current PSAT/SAT assessment) to facilitate the use of computer-adaptive testing, reduce the number of misadministration, and decrease the time required to produce assessment results. Districts should be provided funding, as needed, to assist districts to eliminate the paper-based testing option. The assessments may now be downloaded so connectivity concerns have been eliminated. [See connection to Public Reporting and Engagement recommendation #7.](#)

Recommendation #5: Consider a comparable translation of math, science, and social studies assessments into additional languages besides English. Include home languages that are most represented in multilingual learner populations in Colorado.

Recommendation #6: Expand the Colorado Spanish Language Arts (CSLA) assessment beyond grades 3 and 4.

Recommendation #7: Continue to review and design culturally and linguistically responsive assessment content and questions to reduce potential bias.

Recommendation #8: Consider more time flexibility on assessments so that all students receive the time they need to demonstrate their learning.

Recommendation #9: Continue to reflect on and adapt the state assessment to newer technologies. Specifically, consider how technology, such as artificial intelligence, may/should impact state assessments (including scoring constructed responses). [See connection to Public Reporting and Engagement recommendation #7.](#)

Recommendation #10: Expand the opportunities for schools and districts to promote the benefits of participation on the state assessment with students, families, staff, and communities. [See connection to Participation and Opt Out recommendation #11.](#)

Recommendation #11: Reward schools and districts that have total participation rates above 95 percent on the state assessments. Consider bonus points on the framework, awards, or other incentives to promote strong student engagement and increased visibility into student outcomes on the state

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assessments. [See overlap with Trends recommendation #3, Awards recommendation #5, and Participation and Opt Out Recommendation #1.](#)

Recommendation #12: Continue to provide administrative considerations and accessibility feature accommodations that are allowable to all learners.⁶ Below are some but not all administrative considerations and accessibility features available to all students.

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

Recommendation #13: Consider dividing the assessments into sections to more specifically evaluate the desired skills. For example, include one assessment section without accommodations to assess reading comprehension, and one assessment section with accommodations to assess listening comprehension (as required by a student's IEP or Section 504 Accommodation Plan) within the reading assessment. Similarly, consider making the calculator available for all students throughout the math assessment when not assessing computation skills.

Recommendation #14: Only include state assessment data in the academic achievement and academic growth indicator on the framework. Inclusion of local assessment data as part of the framework calculation is not recommended. However, the state should explore opportunities to support schools and districts in the public reporting of local assessment data, including district-created dashboards. The state should consider how to support districts that may not have the necessary resources to develop and create their own customized dashboards. While the state may provide some guidance related to data integrity and transparency, the state is not responsible for validating or confirming the local data. For districts that choose to use its local assessment data in the dashboard, the state may provide a grant to support the district's use of local assessments. Schools on the clock may be encouraged/required to include local data points such as local assessments and/or for state board directed action. For year 1 and year 2 schools on the accountability clock, the state will prioritize the grant to support the use of local assessment data to drive improvements to exit the clock.

Recommendation #15: Consider modifications to the state's approach to non-federally required assessments, including:

⁶ [Colorado Department of Education.](#)

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- Eliminate the CMAS Social Studies assessment, which is not federally required.
- Maintain the Evidence-based Reading and Writing and Math assessment in grade 9 and 10 (PSAT 8/9 and 10), as these allow for 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 how to embed this assessment into the grade 11 SAT assessments, thus eliminating the grade 11 CMAS science assessment.

E. Measures Sufficient for High School

Opportunities, Challenges, and Observations

The 1241 task force believes that schools and districts should provide all students with access to quality postsecondary and workforce readiness (PWR) opportunities. Specifically, members of the 1241 task force agree that:

- Every Colorado student should have the opportunity to graduate from high school with meaningful postsecondary credit, work-based learning experience, and/or an industry-recognized credential.
- Schools should prepare students to be both college- and career-ready in a manner that is measurable and would allow for recognition of the most effective programs in Colorado.
- Students should be exposed to postsecondary and workforce readiness experiences throughout their K12 education.

This group named what they agreed upon that formed the foundation of their work without calling them “values”. Do we want to align with this, or change this one? Is the term “values” a potential source of pushback?

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. Programs that provide students with these opportunities include [Concurrent Enrollment](#), [ASCENT](#), [Career Development Incentive Program](#), [Early College High Schools](#), [Innovative Learning Opportunities Pilot Program \(ILOP\)](#), [Pathways in Technology Early College High Schools \(P-TECH\)](#), pre-apprenticeships, [apprenticeships](#), and the [Teacher Recruitment Education and Preparation Program \(TREP\)](#), among others.

These programs present important opportunities for Colorado’s students to gain critical PWR skills. However, the [HB22-1215 task force](#), a different task force created by the legislature to study the impact

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and reach of these programs, rightfully identified that too often, these programs are not equitable. Not all students across the state have access to quality options, and some school districts find funding streams to be confusing or inaccessible, and carry high administrative burden. Parents and students are 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. The 1215 task force also identified that under Colorado's current accountability system, the PWR sub-indicators do not fully capture the range of opportunities schools and districts are offering their students to prepare them for postsecondary education and the workforce. For example, students enrolled in some smaller, rural districts do not have the same access to AP and IB courses as do their peers in urban districts, even as some rural districts offer their students other PWR-related opportunities not counted toward district or school ratings under the current accountability system.

In line with the 1215 Task force's recommendations, this 1241 task force recommends the accountability performance frameworks be updated to improve the way PWR opportunities are represented to incentivize growth of these opportunities, better recognize and reward schools for the various ways they are preparing students for their futures beyond K12 education, and better reflect metrics that are predictors of postsecondary and workforce readiness. This task force also recognizes that Colorado needs improved data infrastructures to better measure the long-term impact around PWR programming offered across the state and to determine the efficacy of these programs. We also indicated where our recommendations expand upon the work of the 1215 task force.

Recommendation(s)

Recommendations #1–5 focus on updating the PWR measures in Colorado's accountability system, including the measures that are used and the weights assigned to each measure. These recommendations should be directed to the Colorado Legislature to change the statutes that will allow for these modifications.

Recommendation #1 (1215 task force recommendation): Remove SAT Reading/Writing and Math from the PWR Indicator. The PSAT/SAT Reading/Writing and Math scores are currently represented in both the Academic Achievement (PSAT scores only) and Academic Growth (both PSAT and SAT scores) Performance Indicators, in addition to the PWR indicator. Duplication within the PWR Indicator is perceived by some to be double-counting these national assessments at a time when fewer postsecondary education institutions are requiring the scores for college acceptance and admittance. It should be noted that during the 2020–21 legislative session, HB21-1067 made it optional for first-time freshman applicants to Colorado's public four-year colleges and universities to submit SAT or ACT test scores. The SAT Reading/Writing and Math Scores are still valuable indicators of achievement, but they are not the best predictors of postsecondary and workforce readiness. Removing them from the PWR indicator, but keeping them in the academic achievement and academic growth indicators, makes space for the PWR indicators to include other measures that better assess postsecondary and workforce readiness.

Recommendation #2 (Partial 1215 task force recommendation): Maintain graduation rate in the PWR

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indicator, but increase transparency on what the graduation guidelines are for districts and schools. As part of their recommendations to update the PWR measures in the state’s accountability performance framework, the 1215 task force suggested keeping the graduation rate in the PWR indicator. This task force concurs with the 1215 task force recommendation, but would further recommend that the state publish schools’ and districts’ graduation guidelines for stakeholders. This would help ensure the public has greater insight into what PWR opportunities individual districts are offering their students, and how they are preparing their students for postsecondary education and the workforce.

Recommendation #3 (Partial 1215 task force recommendation): Add “College Before Graduation” as a PWR sub-indicator in the accountability frameworks. This new sub-indicator would include concurrent enrollment, Advanced Placement (AP), International Baccalaureate (IB), and the Cambridge Advanced International Certificate of Education (AICE).

The 1215 task force recommendation called for only the inclusion of concurrent enrollment in the PWR indicator. This task force calls for the addition of AP, IB and AICE in a new “College Before Graduation” PWR sub-indicator. A high school diploma is an important, foundational credential for future job and education prospects, but obtaining college credit or advanced/specialized technical or vocational skills before high school graduation is a goal for every learner in the state. Recognizing a larger menu of college readiness opportunities would help ensure all learners are prepared for postsecondary and workforce opportunities.

Recommendation #4 (1215 task force recommendation): Keep “dropout rate” as a PWR sub-indicator, but reduce the number of points allocated for a low “dropout rate,” further incentivizing and giving credit for “graduation rate” within the PWR indicator. It is important to clearly reflect which schools and districts excel at student retention and reengagement, but the graduation rate generally applies to a much larger number of students, and as such, better represents a district’s commitment to preparing students for postsecondary and workforce opportunities. This sub-indicator would continue to include only students in grades 9–12.

Recommendation #5 (Partial 1215 task force recommendation): To better reflect the suite of postsecondary options available to students beyond high school, rename “matriculation rate” to “pathways progression” and keep it as a PWR sub-indicator. The task force recommends changing the name of the “matriculation rate” sub-indicator to the “pathways progression” sub-indicator, as the former specifically refers to entry into a college or university and does not accurately capture the myriad options available to students beyond high school and how K12 education can prepare students for these options.

The “pathways progression” sub-indicator should continue to include learner progression data into post-high school enrollment in Career and Technical Education (CTE), associates’ degree programs, bachelors degree programs, and the military. The sub-indicator should also continue to include credential attainment while in high school (i.e., dual enrollment with an associate’s degree program).

The task force recommends the “pathways progression” sub-indicator also begin including learner progression data on the following post-high school opportunities:

- Registered pre-apprenticeship and apprenticeship programs

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- Industry recognized credentials
- Other postsecondary education/training programs that meet identified quality criteria, such as alignment with those criteria required by the Eligible Training Provider List (ETPL)

Currently other industry credentials are incorporated into the rates based on voluntary district-submitted data. This task force recommends updating reporting capabilities so it is easier for districts to report industry credential attainment and require reporting under the new “pathways progression” sub-indicator.

Finally, where possible, we recommend utilizing data matching with relevant sources (e.g., the Department of Defense for military enlistment) to ease school/district data reporting burden.

Should you consider including determining (committee, commission, research project) the feasibility of data sharing/exchange requirements between post secondary pathways partners and schools/districts/the state?

Table ##

The table below outlines what PWR sub indicators are currently included in the accountability system and how they are weighted, and provides an example of how these measures and their weights could be updated in accordance with the recommendations outlined above. In Appendix XX [appendix forthcoming from CDE], you can see examples of how these recommended changes could impact a district’s assignment in the school performance frameworks.

		Current PWR Scoring			Recommended Scoring
Sub Indicator	Student Group	Pts Eligible	Agg Pts Eligible	Weights	
Grad Rate	All Students	8	16	44.4%	Increase points eligible for “all students” group
	Disagg. Group	8			
Drop Out Rate	All Students	8	16	44.4%	Decrease points eligible for “disaggregated students” group
	Disagg. Group	8			
Average Scores on the SAT	All Students	Data forthcoming from CDE	XX	XX	Remove from PWR indicator
	Disagg. Group	XX			
Matriculation	All Students	4	4	11.1%	Increase number of points eligible and change name to “Pathways progression indicator” to better represent range of opportunities available to students after high school

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College Before Grad	All Students	-	-	-	Create new category
Total			36	100%	Increase overall points eligible to be awarded

Is there a dependency we need to mention about the recommendations of the trends group needing to be implemented for this to happen?

Recommendation #6 (1215 task force recommendation): The legislature should consider amending statute to allow for the addition of a district PWR option. The task force recommends giving each school district the option to opt into a district PWR sub-indicator if they have a high-quality, pre-approved local accountability process to determine relevant outcomes. This could build off the work of the Local Accountability System Grant created by HB19-204 or S-CAP to provide grant money to local education providers that adopt local accountability systems to supplement the state accountability system. Offering this local option would allow districts to choose sub-indicators that best represent the goals and values of the individual school systems, and also recognize ways in which districts are giving students PWR opportunities that are not currently acknowledged under the state’s accountability system. *See N-size recommendation #5 and Public Reporting and Engagement recommendation #8 for another mention of local accountability systems.*

Recommendation #7: 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 the collaboration of CDE and potential future financial contributions from the state. While examining the role and effectiveness of these programs is beneficial, it is not believed that these efforts to expose and support career interest development at the lower grade levels should be subject to a formal assessment and/or included on school and district reporting measures at this time. *Feedback needed from task force: could this item offer a potential for bonus points? Could it be included in the consideration of awards?*

Recommendation #8 (1215 task force recommendation): The Statewide Longitudinal Data System Governance Board, housed in the Office of Information Technology, should support the development and implementation of an SLDS in Colorado and ensure it highlights outcomes of current PWR programs being used in Colorado. During the 2023–24 legislative session, HB24-1364 was introduced and laid the groundwork for the governance structures and technology needed to create an SLDS in Colorado that will focus initially on education and workforce outcomes. HB24-1364 has been signed into law by Governor Polis. The SLDS will allow the state to better track the breadth of PWR programs available to Colorado’s students and help determine which are most effective in preparing students for postsecondary education and workforce opportunities.

F. Measures Sufficient for Early Grades

Opportunities, Challenges, and Observations

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The quality of early grades instruction and the support of whole child development is imperative. In particular, this task force believes:

- Early education outcomes should include developmental indicators beyond literacy and math, such as... *examples forthcoming from study group* (source: studies of current early childhood measures, stakeholder perspective, early education research);
- early education should include quality programming, such as... *examples forthcoming from study group* (inputs);
- including early education indicators in performance frameworks can be a source of improvement for low growth/high performance schools;⁷
- 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;^{8 9 10 11}
- the use of early grades assessments are most effective when used diagnostically and with a body of evidence to target foundational skills development; and
- family engagement in early years is essential.^{12 13}

The Colorado Accountability System’s District and School Performance Frameworks do not currently include K2 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. The task force finds 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 K2 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 problematic. 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. Secondly, preschool and kindergarten are not compensatory, which limits public schools’ responsibility and accessibility with regards to student performance. There are also a significant number of preschool providers outside of public schools that could not be accounted for in these measures.

⁷ Conversation with Elliot Regenstein.

⁸ [Foundation for Child Development.](#)

⁹ [National Institute of Health.](#)

¹⁰ [The Education Trust.](#)

¹¹ [National Bureau of Education Research.](#)

¹² [U.S. Department of Health and Human Services.](#)

¹³ [NAEYC.](#)

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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 in school districts to monitor early grades student growth and development; reviewed accountability frameworks from other states for inclusion of K2 measures; studied inclusion of K2 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 Gold*) and READ assessments (Dibels, iReady). Outside of *TS Gold* kindergarten readiness, a math assessment was not identified as currently required by the state. However, the use of current literacy and math measures at K2 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 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 the intended use.

A second indicator considered was other developmental factors beyond literacy and math, 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 developmental focus to caregivers and teachers, rather than declarative. Furthermore, the tool is primarily aimed for use in preschool and kindergarten, rather than the targeted grades of K2.

K2 chronic absenteeism data was studied as a possible indicator that could be aligned with the 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. However, the challenge with this indicator is that kindergarten is not compensatory, so this would be a measure for grades 1 and 2 only.

Recommendation(s)

Recommendation #1: Given the challenges discussed above with adding additional measures focused on K2 to Colorado's accountability system, the task force does not recommend additional state measures for the early grades as a solution to the current inequities and opportunities for students.

The measures the task force considered do not align with the values set out by the group on early grades education, and so would not serve to improve the accountability system. The task force would only recommend chronic absenteeism for grades 1 and 2 be included in the current system if it was weighted as bonus points to a school with low rates of chronic absenteeism. *Feedback needed from task force: should "non recommendations" such as this one be included in the recommendations or pulled up into the background section?*

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Recommendation #2: The task force recommends using local K2 measures as an addendum to state measures or through a dashboard of student information. In particular, a K2 dashboard should be user friendly and centrally display:

- If ECE, Universal Preschool Colorado (UPC), or Pre-K is available in that school;
- the Qualistar rating if available;
- the percentage of students in the kindergarten classrooms who were students in UPC;
- READ and TS Gold Data available for the term;
- percent of students exiting READ Act against a district and state average;
- five values that represent each school (e.g., small class size, high mental health supports, multilingual, enrichment programs, etc.); and
- K2 chronic absenteeism.

Other states have included public facing dashboards as part of their accountability system. This makes student data visually accessible to the public as information without it needing to be included in a performance framework rating. It also promotes family engagement through information to the family. A dashboard of K2 data, particularly if it includes local assessments, can support system improvements without adding weight to the current model.

[See Public Reporting and Engagement Recommendation #1 for another recommendation related to dashboards](#)

G. Public Reporting and Engagement

Opportunities, Challenges, and Observations

When considering the accountability system's public reporting and engagement structures, several themes emerged from the task force:

- 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, but varied levels of understanding the data, there should be multiple entry points to accessing the data, and multiple ways of passively displaying and actively pushing out the data; and
- given the large amount of noise in our daily lives, there needs to be an intentional promotion of education data along with a compelling "why" to engage parents and more lay-stakeholders.

Across task force discussions, it was apparent that a transparent accountability system with effective public reporting and engagement has the potential to result in greater investment of time and energy from families, educators, community leaders, and policymakers in service of improving public schools.

While Colorado reports out an array of education data, there are several areas where improvement is needed. For example, Colorado's [SchoolView](#) remains a difficult-to-navigate dashboard, despite recent attempts to update it. Drilling down to pertinent data points, including academic achievement and

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growth rates, is not intuitive. Trend data is not easily accessible. When on a school district page, there is not a clear way to view data for schools within the district.

It is also not clear to task force members that Colorado's dashboards convey a strategic vision for what the state sees as the key milestones for students to be successful from pre-K through college and career. The data presented on the dashboard are without explanation or without rationale for inclusion. Indicators such as attendance rates and student-teacher ratios are prominently displayed, while academic achievement and growth are not. Lastly, there are also [different versions](#) of comprehensive dashboards on CDE's website, and narrowly tailored dashboards run by specific units (e.g., [graduation rates](#)), which makes it difficult to understand which dashboard is supposed to be the primary source of information.

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 easily obtain more detailed data. An important element the task force also discussed was creating space for local indicators to be displayed for users that want to learn about the local context.

Example #1: [California](#) serves as a good example of a comprehensive, navigable, easy-to-understand dashboard. Moving through different screens to get more details is intuitive. Data are displayed through color-coded dials that are easy to interpret, and there is a border at the bottom of the webpage to provide a quick refresher on the performance dials if needed. The subgroup data page provides an easy way to understand performance differences by race, ethnicity and 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, what the state goals are for students, and where students currently are in meeting those goals. After the introduction, users can easily navigate to school- or district-level data, where color-coded performance dials similar to California's are used to convey key metrics. Clicking on any of the dial boxes leads to a more detailed view containing subgroup data. As with California, both current year data and trend data are provided. Overall, the site is easy to navigate, and conveys a coherent statewide theory of action of what the key milestones are for students from pre-K through college and career. Thus, Indiana provides a north star for not only data display but also for conveying the "why." Lastly, FAQs are within easy reach on each part of the website, and the page links to more comprehensive, yet still easy to comprehend, [documentation of Indiana's indicators](#).

To see detailed screenshots of each of these state's dashboards, please see Appendix [X](#).

Recommendation(s)

Recommendation #1: Focus on one statewide dashboard. Take inventory and conduct a landscape analysis of the different dashboard versions managed by CDE, determine what data points and presentation formats are most useful, what is duplicative, and how the overall dashboard could be more user friendly. [See Measures for Early Grades recommendation #2 for another recommendation related to](#)

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dashboards.

Recommendation #2: Determine what the statewide vision is for student success and display prominently the key indicators that map to that vision on the dashboard. Present the “story” to tell the why behind the data and better engage stakeholders. (See [Indiana's GPS Dashboard](#) and corresponding [case study](#) as an example.)

Recommendation #3: Run a public information campaign to launch 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 the data.

Recommendation #4: Include summative ratings on the dashboard. While statewide dashboards can convey a wealth of information on school and district performance, summative ratings help parents and stakeholders easily interpret the data.

Recommendation #5: Revise summative rating labels to improve understandability. Colorado’s ratings are not intuitively understandable and could be updated to help leaders, educators, parents and other stakeholders comprehend the overall data. See the accreditation section for more discussion. **See Accreditation recommendation #3 for overlap.**

Recommendation #6: The statewide dashboard should include school and district-level information and be easily searchable. Ensure stakeholders can find the information they are looking for (e.g., schools that have math or dyslexia supports and are achieving improved results.)

Recommendation #7: To the extent possible, improve the timeliness of state summative data so that the data are actionable by school leaders, educators, and parents. See the assessment section for recommendations on this topic. **Determine if we reference like this, or consolidate and put the recommendation in one place.**

Also see connection to Assessment recommendations #4 and #9.

Recommendation #8: In the statewide dashboard, consider including local indicators reported out by school districts. (e.g., [California](#)). **See Measures for High School recommendation #6 and N-size recommendation #6 for another mention of local accountability systems.**

Recommendation #9: Beyond the dashboard, enable the development of reports that are customized to a stakeholder group/type (parents, families, educators, community). Such reports should be made public in as timely a manner as possible.

Recommendation #10: Encourage sharing of best practices from schools and districts that are having success with parent engagement around data.

Is there a funding/staffing recommendation to support all of this work?

H. Improvement Planning

Opportunities, Challenges, and Observations

All of Colorado’s schools and districts participate in continuous improvement planning to manage their performance efforts. In particular, this task force believes that the accountability system’s improvement process should:

- Promote transparency for schools and districts;
- require a cycle of continuous improvement to effectively engage schools in improvement efforts;
- lead to improved student outcomes; and
- support schools that are on the accountability clock.

Improvement planning is a foundational education practice. As part of the Education Accountability Act of 2009, Colorado requires all districts to conduct annually an improvement planning process 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.”¹⁴ Currently, 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 a number of components, which are 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 subgroups, which is important for considering the efficacy of strategies being implemented;
- develop a set of major improvement strategies that are aligned with the results of their performance;
- develop accompanying action steps and implementation benchmarks, which are the adult actions that indicate progress towards implementing the strategy; and
- establish both long-term and interim goals to progress monitor the efficacy of the process over time.

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

In years past, however, district leaders and staff noted that completing the improvement planning template itself to be cumbersome. In response, CDE has already embarked on a process to make this form more streamlined, and will be making 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

¹⁴ [Colorado Department of Education](#).

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planning documents in lieu of completing the entire UIP, for example allowing for the submission of 90-day plans instead.

Though CDE has already made updates to the template, this task force believes additional changes could be made to the process to ensure improvement planning not only focuses on compliance, but actual continuous improvement that will allow educators to link improvement planning processes to improved student outcomes. In particular, the UIPs could be more user friendly, in a way that would allow for greater engagement with the plans, according to feedback received from some board members, parents, educators, and education leaders in the private and nonprofit sectors. While this task force agrees that the current process promotes visibility and transparency, this does not necessarily mean that the information is provided in a way that is easily understood and actionable for school and district stakeholders. Currently, the UIPs make it difficult for stakeholders to engage in progress monitoring, resulting in uneven implementation of plans and strategies across schools and districts.

In addition, CDE's emphasis on the improvement process falls on the writing and completion of the plans, rather than the offering of robust support tailored for schools and districts most at risk of going on the accountability clock. For example, CDE does only offer feedback on UIPs if the school or district is on the accountability clock, but for these entities, feedback is not offered until months after submission. While this task force does not advocate for increased state oversight of the improvement planning process, CDE could better streamline its efforts and provide targeted resources and support for those districts and schools most in need of implementing effective improvement strategies, thereby helping the improvement planning process lead to actual improved student outcomes.

Recommendation(s)

Recommendation #1: CDE should continue to engage in a regular cycle of stakeholder input and revisions to the improvement planning template. 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.

Recommendation #2: CDE should provide guidance to local boards on when and how to review and monitor the improvement planning process. This will help to enhance implementation consistency and fidelity, while avoiding increased oversight and compliance requirements from CDE. It will also involve the district more in its own improvement planning efforts and allow for UIPs to be reviewed in more public settings.

Recommendation #3: CDE should further streamline the improvement planning process to direct more resources and attention toward schools at risk of going on the accountability clock, while continuing to make the process simple and straightforward for schools and districts not on the clock. CDE should emphasize increased support for districts, rather than additional oversight. Specific strategies to support schools and districts on year 0 of the accountability clock could include: *For task force feedback: consider how this recommendation aligns or supplements the recommendations in the supports and interventions section, esp. recommendation #1.*

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- Providing data analysis to help identify the most effective improvement strategies tailored to local needs, which will also make the process more cohesive with the state review panel;
- supporting the attainment and use of alternative measures to drive improvement;
- helping schools and districts better utilize strategies and resources they already have in place to support improvement efforts; and
- expediting the feedback CDE gives priority improvement and turnaround schools on their UIPs.

I. Supports and Interventions

Opportunities, Challenges, and Observations

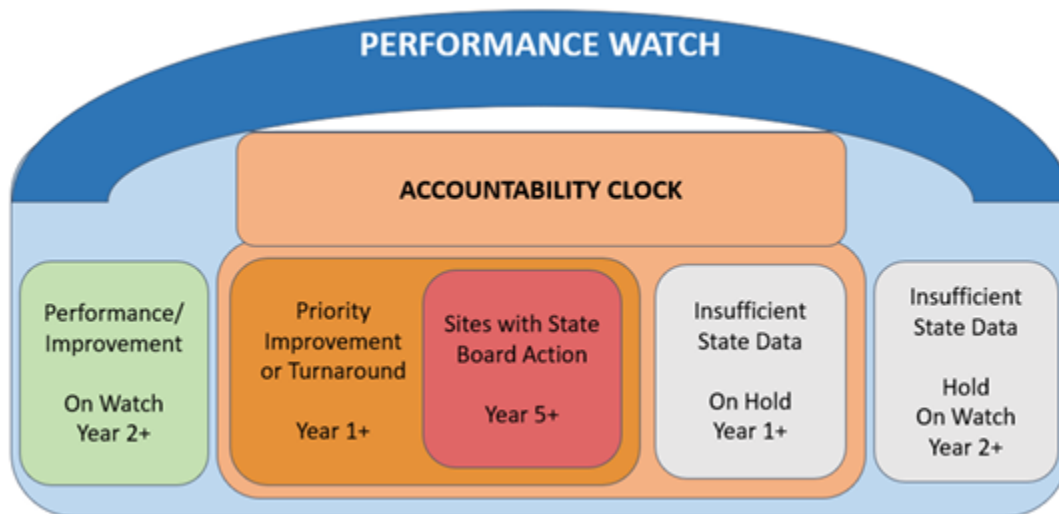
When considering recommendations to address the supports and interventions offered to Colorado's schools and districts through the accountability system, the task force prioritized the following values:

- Interventions, support and technical assistance should be provided before a school goes on the clock;
- schools and districts on the clock should receive earlier intervention to move off the clock;
- supports offered should be continuous and coherent;
- supports and interventions should be evidence-based vetted;
- districts play an important role in school improvement efforts;
- districts have a responsibility to sustain school improvement efforts after grant funds expire that were directed for school improvement efforts to move schools off of the clock;
- establishing a community of practice to build school and district competence in school improvement and turnaround work could help address the isolating nature of this work;
- CDE staff provides expertise and technical assistance that is valuable to turnaround work; and
- district exemplars and best practices should be used as part of the supports and interventions process.

The task force sought to understand the current systems of support for schools and districts, as well as how many schools and districts are identified as Turnaround and Priority Improvement. These schools and districts are referred to as “on the clock”.

This graphic illustrates the progression of schools and districts on the clock.

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

- From 2010 to 2018, a school earning a Turnaround (“T”) or Priority Improvement (“PI”) rating for the first time was labeled Year 1 and all subsequent, consecutive PI/T ratings would advance the clock by one year. If the school earned an Improvement or Performance rating their clock was reset and a future PI/T rating would restart at Year 1.
- Note there was a pause on calculating plan types in 2015 due to a state assessment transition.
- Of the 620 schools on the accountability clock (i.e., PI, T) from 2010 to 2018 that earned a Year 1 on the clock, 41 percent progressed to Year 2 (255 schools). The other 59 percent of schools exited the clock after one year.
- 1483 (70.8 percent) schools were never identified for Turnaround or Priority Improvement from 2010 through 2018.
- 238 (11.4 percent) schools were identified as Year 1 at some point between 2010 and 2018 but never progressed to Year 2 and were never identified again.
- 146 (7.0 percent) schools were identified as Year 1, moved beyond Year 2 (up to year 7), before exiting the clock prior to 2018.
- 35 (1.7 percent) schools were identified as Year 1, moved beyond Year 2 (up to year 8) and were still on the clock in 2018.
- 137 (6.5 percent) schools were identified as Year 1 more than once (max 3) but never moved beyond Year 2 between 2010 and 2018.
- 51 (2.4 percent) schools were identified as Year 1 more than once (max 3) and moved to Year 3 or beyond between 2010 and 2018.

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

Year on Clock (excludes 2015)	Count of Schools Included	Count of Schools that Advance	Percent that Advance
Year 1 (2010–2018) to Year 2 (2011–2019)	620	255	41%
Year 2 (2011–2018) to Year 3 (2012–2019)	237	120	51%
Year 3 (2012–2018) to Year 4 (2013–2019)	113	70	62%
Year 4 (2013–2018) to Year 5 (2014–2019)	65	41	63%

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

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

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

The CDE Theory of Action for school improvement states:

If the Department...

- fosters key conditions and research-based turnaround principles,
- diagnoses and structures focused improvement planning,

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- 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.

The task force recognizes the logic within the Theory of Action, and has identified several areas to accelerate bold, urgent support and interventions. For instance, currently, support and interventions are designed to be reactive rather than proactive. That is, there are limited supports and interventions available to schools and districts on “watch”. Some grant monies may be available, but the first priority is to provide funding to schools and districts with most significant needs as identified from the accountability frameworks. Furthermore, 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). In addition, 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 provide the state with the authority to demand new leadership.

The task force discussed the need for the state to intervene earlier and provide the state with stronger, bolder moves to turnaround schools and districts on the accountability clock.

Recommendation(s)

Accountability Clock: Year 0 and 1—Early Indicators of Distress

Recommendation #1: State support and interventions must occur earlier in the process (Year 0 and 1).

- Year 0: Develop and implement an Early Indicators of Distress Evaluation for all Year 0 schools that appear to be trending towards Year 1 identification.
- Year 1: Using the Early Indicators of Distress Evaluation, CDE will determine which Year 1 Schools are likely to progress to Year 2. CDE may recommend a Diagnostic Review for these Year 1 Schools by a third party and/or with CDE. Consider if a district, depending on its size, has 1, 2, or 3 schools on the clock, and if that district should do a diagnostic review by a third party. A district may on its own decide to conduct a self-assessment with an external reviewer(s) that have been vetted by CDE and have evidence of success.

Consider overlap with improvement planning recommendation #3.

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Accountability Clock: Year 2+

Recommendation #2: State support and interventions must be bold and urgent earlier in the process (Beginning in Year 1).

- Consider the district as a change agent and as the lever of change to improve the schools' outcomes. The district and the school plan must be coherent to each other.
- Beginning in Year 2, the CDE will engage with Schools and Districts through iterative support and ongoing feedback that begins with the development of a comprehensive School Improvement Plan. The Plan will be reviewed and approved by CDE staff. CDE, in partnership with the District, may make recommended modifications to the School Improvement Plan. Ultimately CDE will approve or continue to recommend modifications to the Plan. The CDE recommendations will be in alignment to the Four Domains of Rapid School Improvement that address the resources, training, high quality curriculum and materials, potential external partnerships, and potential partnerships with neighboring schools and districts. The CDE recommendations are requirements to be implemented by the District.
- Consider having the CDE analyze the Year 1+ School and District UIP strategies and data to determine what state-wide professional learning and resources should be made available for Districts to consider as they implement their UIPs.

Recommendation #3: Increase opportunities for schools and districts to learn from each other.

- The department has a history of providing exemplars and best practices. CDE should:
 - Expand the Connect for Success program so that more schools and districts may partner with peers to improve student outcomes. Based upon 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.
 - Considering implementing a financial bonus for Schools/Districts that become a Bright Spot.

Consider overlap with awards recommendation #1.

Recommendation #4: Increase state funding for bold turnaround school and district solutions.

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- Consider increasing funds for schools and districts pursuing bolder solutions, such as, but not limited to:
 - Management Restructuring—changing leadership roles, bringing in new talent, and enhancing governance practices.
 - Asset Restructuring—divesting underperforming programs, 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.
- Consider the budgetary expectations for school turnaround and implement a funding sustainability plan. Drive resources to the schools most in need. Ensure the district plan details the allocation of resources to address the need.
- Consider allowing School Transformation Grant funding to be allowable to not only support the school’s turnaround efforts, but also the district’s efforts so that a coherent School Improvement Plan is implemented.
- Match state dollars grants for turnaround with district funds.

Accountability Clock: Year 4 (Early Action) and Year 5+

Recommendation #5: State Board of Education (SBE) directive actions must change and expand beyond current options.

- Require schools and districts to come before the board in Year 5 (or Year 4 early action) with a CDE approved plan. Currently, there is no requirement in statute that a school or district come before the SBE with a school improvement plan.
 - The Plan shall have both short term objectives and measurable benchmarks, as well as yearly benchmarks for evaluation.
 - The Plan shall have clear budget allocations to support the turnaround needs of the district’s identified schools, and include a financial sustainability plan.
- Consider the development and implementation of interventions schools and districts may take prior to the State Board intervening. Consider how the plan of interventions may be monitored by CDE staff, instead of formal board hearings.
 - Provide authority to CDE to monitor the plan, provide technical assistance, and define additional areas of improvement.
- Improvement Planning and Implementation should be ongoing and not once a year.
 - Consider regular check in with CDE (state-wide convening, community of practice) every 3–6 months to present their plan and progress (community of practice); 4 Domains of Rapid School Improvement—lift up those doing the best practices among their peers; not voluntary, but required to attend; require the principal and superintendent and/or principal supervisor district leader to attend; depending on the plan require other district level team members to attend.

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- Consider how the 90-day short cycle planning, not just the 1-year plan, can be leveraged to move the needle.
- Expand the purpose of the State Review Panel (SRP).
 - Consider adjusting the reviews so that the review is diagnostic in addition to evaluative.
 - Consider adjusting how the SRP can include meaningful data into its report so that the SBE may best evaluate the Plan and/or identify the best directive action.
- The CDE is to conduct an evaluation of external managers and the return on investment to districts and schools. 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.

Table X: Progression of Supports and Interventions

Year on Accountability Clock	Early Indicators of Distress Evaluation	Diagnostic Review Self-Assessment	School Improvement Plan Submitted to CDE to determine Recommendations Plan defines the resources, training, curriculum, materials, external partners, etc.	Community Meeting to Discuss Plan and Progress CDE monitoring of Plan	If CDE recommendations followed, funding with District match awarded If not followed, no funding award (grant/innovation funds, PPOR)	State Review Process (SRP)	State Board Directed Action
Year 0	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

J. Awards

Opportunities, Challenges, and Observations

Awards are perhaps one of the least understood and most underutilized aspects of our state’s accountability system. Most don’t even recognize them to be part of our state’s accountability 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 consequential component of our state’s overall accountability system, including elevating the prominence of awards to feel more relevant and have them serve as more meaningful tools for learning best practices. There are lots of great things 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.

In considering recommendations to address the accountability system’s awards, the task force surfaced the following values to ground its conversations on this important topic:

- Good things are happening in our schools; let’s celebrate that—loudly and clearly.
- Accountability doesn’t always have to be about consequences. In fact, people are often far more motivated and driven by recognition than sanction.
- Awards should occupy a far more prominent place in our accountability system so that schools are getting the recognition they deserve. This may necessitate streamlining the current awards we have 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 be seeking 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 getting the award in the first place.
- While our current awards system could benefit from some streamlining and clarity of purpose, that doesn’t necessarily mean it needs to be solely focused on academics and academic results. Awards could 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.

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

In its review of current award offerings, the task force identified a number of challenges with our current system. Firstly, many people don’t realize awards are connected to our accountability system. Likewise, the current awards we do have are so disparate and disconnected that it can make it challenging to properly elevate them and effectively use them as a means of “telling the story” of the positive things happening in our schools. In addition, awards are underutilized as a tool to learn from, incentivize, and

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replicate best practices. More resources behind awards are likely necessary to give them the prominence and attention they deserve. Such resources could then also be used to help with the curation and dissemination of best practices. Lastly, there's currently no prohibition against awards going to schools and districts with either low test participation or low performance across disaggregated student subgroups. These should be necessary preconditions for award consideration.

Recommendation(s)

Recommendation #1: Utilize awards to focus on what's working in schools and districts opposed to what's not. Rather than investing so much money in turnaround efforts with a questionable record of success, this task force recommends that the state instead shift more of these resources to recognize, reward and expand what is already working. Focusing on lifting up success stories and best practices has a greater likelihood of moving the needle on performance in the long run. **Consider overlap with supports and interventions recommendation #3.**

Recommendation #2: Increase the amount of resources available to CDE or others to meaningfully research, document and disseminate the best practices that are occurring in award-winning schools and districts. [CDE's Connect for Success program](#) may be a good model for how best to do this.

Recommendation #3: Streamline the number of existing awards to ensure maximum impact and focus on state priorities and values. This streamlining process should also ensure awards have a clear focus on schools and districts that are achieving the best results for historically underserved students and families. The [Governor's Bright Spot award](#) or [CDE's Connect for Success program](#) could serve as strong models for this recommendation.

Recommendation #4: Consider expanding the criteria for what schools can be awarded for so that it is clear success is not solely synonymous with academic achievement.

Recommendation #5: Implement business rules for awards eligibility that mirror those recommended earlier in this report that address when a district should be eligible to receive a distinguished designation. These business rules include:

- The student participation rate on state assessments is at least 85 percent. This percentage should encompass only those students whose parents' did not formally opt them out of the assessment. **Feedback needed from task force: should the 85 percent be out of all enrolled students or only those students whose parents did not formally opt them out? And is 85 percent the right number?**
- The "all students" group receives a rating of at least "meets" for academic growth.
- The "all students" group receives a rating of at least "approaching" for academic achievement.
- No individual subgroups receive a rating of "does not meet" for academic growth.

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See overlap with Assessment recommendation #11, Trends recommendation #3, and Participation and Opt Out recommendation #1

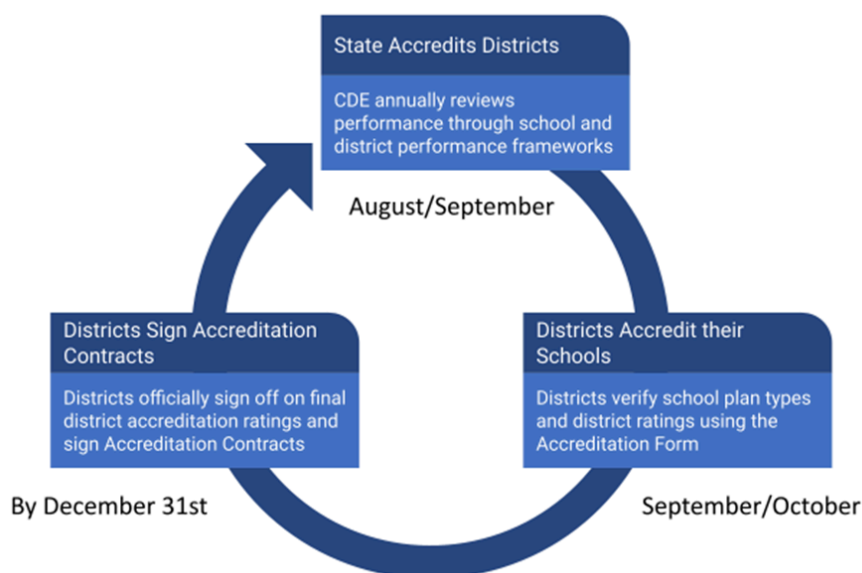
Recommendation #6: Offer additional benefits for districts and schools that do receive awards to make awards more attractive and compelling. This could include financial incentives, statewide recognition, priority points on grants, priority participation on task forces, etc.

K. Accreditation

Opportunities, Challenges, and Observations

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.



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

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accredit districts. The law states school categories for accreditation must be comparable to districts and must adopt and implement the same plan types (performance, improvement, priority, or turnaround) as the state. To this end, CDE rules establish the accreditation process to provide districts with accreditation plan types for each school and the local Board must use these designations to accredit their schools or participate in the request to reconsider process with evidence to support a different accreditation type.

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

These include:

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

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

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

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

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

Determining accreditation with nearly exclusive emphasis on student outcomes is highly unusual in national and global accreditation processes. Accreditation is most often associated with measures beyond student outcomes to include conditions, or quality indicators, that contribute to outcomes. Examples of accreditation quality indicators often include climate, leadership, and practices or procedures. The typical accreditation process that evaluates the conditions of the system results in districts and schools having details about the conditions of the system that can support effective system improvements and outcomes. These resources from [Cognia](#) and the [Accrediting Commission for Schools](#)

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[Western Association of Schools and Colleges](#) provide widely accepted accreditation procedures. In fact, some states and many local districts contract with these organizations to “accredit” their schools and districts.

Colorado currently bases accreditation ratings on student outcomes plus assurances in finances, safety and curriculum 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).

This task force would contend Colorado provides student outcome ratings through the performance frameworks and very minimal support for accreditation through the assurance of provisions process.

A third and related aspect of accreditation is the identified challenges associated with the performance frameworks including assessments, “n” size, trends across groups, and post secondary measures, that have a direct impact on the assignment of accreditation by the State Board of Education. An example of the challenge of the interplay of the framework challenges and resulting accreditation plan types is any district with insufficient data can enter an alternate request to reconsider process and determine its own plan type. There is no further evidence required, allowing a local Board to assign an accreditation label (including “distinction”). Should accreditation of districts and schools in Colorado remain fully dependent on student outcomes as calculated in the performance frameworks, then a discussion of accreditation should focus solely on improvement to the performance framework calculations and resulting assigned labels. The recommendations to the performance frameworks must be considered and changes made prior to considering how and to what degree the performance frameworks should be used in accrediting districts and schools in Colorado.

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

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

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

Recommendation(s)

Recommendation #1: Develop an accreditation process separate from or not exclusively determined by Performance Frameworks. Many states accredit schools separate from providing stakeholders with transparent and accountable data on student performance outcomes. This would require legislative and rulemaking change. By accrediting schools based on quality indicators of highly effective systems,

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

Recommendation #2: If accreditation remains dependent on Performance Framework plan types, implement changes to the Performance Frameworks identified as challenges in this report. These include n-size, assessment, post-secondary, trends in groups, opt-outs, and others.

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

Suggestion 1:

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

Suggestion 2:

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

Suggestion 3:

- A
- B
- C
- D
- F

Suggestion 4:

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

See overlap with Public Reporting and Engagement recommendation #5.

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Recommendation #4: Consider replacing the Request to Reconsider process with a more traditional accreditation 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 for accrediting schools through such a process.

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

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

L. Participation and Opt Out

Opportunities, Challenges, and Observations

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

Data table from CDE showing participation rates forthcoming

¹⁵ [Colorado Department of Education](#).

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

Feedback needed from task force: should the term “parent excusals” or “opt-outs” be used? While parent excusals account for a large percentage *[exact value forthcoming]* of the total nonparticipants on the state assessment, there are other reasons why students may not participate or why student results may not be included in the performance framework. For example, a student who experiences a misadministration of the assessment (i.e., when a test is not administered in accordance with state guidelines), will not count as a participant.

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

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

Colorado’s Federal accountability plan also must account for parent excusals along with other nonparticipants. While not directly relevant for this taskforce, CDE will re-calculate federal identifications by applying the lowest total score for each student below the 95 percent total participation rate. This is a process that is also utilized in other states for their state accountability system (e.g., [Wisconsin](#)).

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Recommendation(s)

Recommendation #1: Schools with less than 85 percent of the students participating in assessments should not be eligible for awards. *Feedback needed from task force: Should this recommendation also reconsider the threshold for ISD ratings automatically applying? And should it go here, or awards? See overlap with Assessment recommendation #11, Awards recommendation #5, and Trends recommendation #3.*

Recommendation #2: Revise the prohibition on encouraging and discouraging opt-outs. Impose additional restrictions on who might be able to opt out.

Recommendation #3: Review and update process for determining which students count for participation rates and how to better report/share information related to who is and isn't participating. For example, maintain the Students with Limited or Interrupted Formal Education (SLIFE) language in 2024 Assessment Participation and Accountability. This means that students with limited or interrupted formal education take the state test, and their results count for participation but not toward a school's proficiency or growth rating.

Recommendation #4: Refer to recommendations from assessment section of this report that will help increase buy-in to and value of assessments by students, families, teachers, etc.

VI. Conclusion

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

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VII. Appendices

A. Summary table of recommendations

This will be added once recommendations are finalized. Table will include recommendations, what study group topic(s) they relate to, and whom the recommendation should be directed to.

B. 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

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- 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

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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

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- 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

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- 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

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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

Agenda Topics

September 16, 2024

Objectives

Agenda Topics

October 18, 2024

Objectives

Agenda Topics

October 22, 2024

Objectives

Agenda Topics

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C. Task Force Membership

Task force members, please review your name and title below and make edits as needed. Once you've made your edits, or if you have no edits, please initial in the far right column so we know we have the right information in this section.

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

NAME	REPRESENTING	APPOINTING AUTHORITY	<i>The information in this table is correct</i>
Dr. Wendy Birhanzel (Chair) , Harrison School District 2	Superintendent	House Speaker	
Hon. Rebecca McClellan (Vice Chair) , Colorado State Board of Education CD6	State Board of Education	Senate President	
Tomi Amos , KIPP Colorado Public Schools	Charter Network Leader	Governor	
Dr. Rob Anderson , Superintendent, Boulder Valley School District	Superintendent (Urban)	Senate President	
Amie Baca-Oehlert , Colorado Education Association	Statewide Teachers Organization	House Speaker	
Pamela Bisceglia , Advocacy Denver	Statewide Organization Specializing in Equity and Inclusion	House Speaker	
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	

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Don Haddad, Ed.D., Superintendent, St. Vrain Valley Schools	Superintendent	House Speaker	
Dr. Rhonda Haniford, Colorado Department of Education	Colorado Department of Education	CDE Commissioner	
Tammi Hiler, Office of Governor Jared Polis	Governor's Office Representative	Governor	
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, Executive Director, Transform Education Now	Statewide Parents/Families Organization	House Speaker	
Tony May	Local School Board Member (Rural)	House Minority Leader	
Dr. Robert Mitchell, Campo School District	Teacher (Rural)	Senate Minority Leader	
James Parr, Montezuma Cortez/ Southwest Colorado	District Administrator (Rural Accountability)	Governor	
Catie Santos de la Rosa, Denver Public Schools	Teacher (Elementary)	Senate President	
Mark Sass, Executive Director, Teach Plus Colorado	Statewide Teachers Organization	Governor	
Dan Schaller, President, Colorado League of Charter Schools	Charter School Organization	Governor	
Jen Walmer	Statewide Education Policy Organization	Senate President	

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Lisa Yates, Superintendent Buena Vista School District	Superintendent (Rural Participant in Local Accountability System Grant)	Senate Minority Leader	
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D. Interim Report

Per the legislation, the task force was required to submit to the Legislature by March 1, 2024, an [interim report](#) with initial findings and recommendations. The facilitators drafted the report, and task force members were given the opportunity to add their feedback and suggested revisions. The facilitators incorporated this feedback in the final version of the report.

E. Working Definitions of Key Terms

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

F. Accountability Reference Handbook

CDE created the [Accountability Reference Handbook](#) to answer the task force’s questions about the Accountability and Accreditation system. It was a living resource that was continually updated as the task force had new questions and requests for the Department.

G. Examples of California’s and Indiana’s Statewide Dashboards

[California](#)

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STATE PERFORMANCE OVERVIEW

State of California

2023

Generate PDF Report

Explore the performance of the State of California under California's Accountability System.

Chronic Absenteeism Yellow	Suspension Rate Orange	English Learner Progress Yellow	Graduation Rate Orange
College/Career Medium	English Language Arts Orange	Mathematics Orange	

Los Angeles Unified

Back to Overview | View Additional Reports | Show School Details

Student Group Details

All Student Groups by Performance Level

13 Total Student Groups

 Red No Student Groups	 Orange No Student Groups	 Yellow No Student Groups
 Green Foster Youth	 Blue African American American Indian Asian English Learners Filipino Hispanic Homeless Two or More Races Pacific Islander Socioeconomically Disadvantaged Students with Disabilities White	 No Performance Color No Student Groups

Lowest Performance | Very Low | Low | Medium | High | Very High | Highest Performance

About the Accountability System

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[Indiana](#)



Welcome to Indiana Graduates Prepared to Succeed (GPS)

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

Scroll to continue



PREK-GRADE 2



Expanding quality, affordable, and accessible early learning

GRADES 3-8



Delivering educational fundamentals: emphasis on reading and STEM

GRADES 9-12



Providing seamless transitions for Indiana students

GRADUATION AND BEYOND



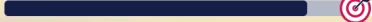
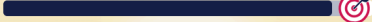
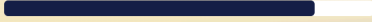
Supporting Indiana students for a brighter future

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.

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<p>6TH GRADE MATH GROWTH</p>  <p>35% of Indiana sixth graders are meeting their math growth goals.</p> <p>Full Report ></p>	<p>GRADUATION PATHWAYS COMPLETION</p>  <p>89% of Indiana students complete their graduation requirements.</p> <p>Full Report ></p>	<p>EMPLOYMENT & ENROLLMENT</p> <p>Over the course of a lifetime, Hoosiers with education beyond high school are likely to earn</p> <p>\$1,000,000</p> <p>more than those with only a high school diploma.</p> <p>Full Report ></p>
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Where are we going?









<p>3rd Grade Literacy</p> <p>Percentage of grade 3 students showing proficiency on IREAD-3.</p> <p>81.9% 95%</p>  <p>2023 2027</p>	<p>Graduation Pathways Completion</p> <p>Percentage of grade 12 students who complete graduation requirements.</p> <p>89% 95%</p>  <p>2023 2030</p>	<p>Employment & Enrollment</p> <p>Percentage of grade 12 students employed or enrolled, <i>within Indiana</i>, one year after their expected graduation year. Goal TBD.</p> <p>84.5%</p>  <p>2021</p>
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Indianapolis Public Schools

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

Grades PreK - 12th
22,027 Enrolled
67.6% Free/Reduced Lunch
School Corporation
Metropolitan

Benchmarked Headline Indicators

PREK-GRADE 2	GRADES 3-8	GRADES 9-12	GRADUATION AND BEYOND
<p>Kindergarten Readiness</p> <p>Percentage of students demonstrating the skills necessary to be considered ready to start kindergarten.</p> <p style="text-align: center; color: #95a5a6;">Coming soon</p>	<p>3rd Grade Literacy</p> <p>Percentage of grade 3 students showing proficiency on IREAD-3. Goal: 95% by 2027.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>60.6% ▼ 2.2%</p> </div> <div style="text-align: center;">  <p>State: 81.9%</p> </div> </div>	<p>Graduation Pathways Completion</p> <p>Percentage of grade 12 students who complete graduation requirements. Goal: 95% by 2030.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>79.9% ▲ 2.4%</p> </div> <div style="text-align: center;">  <p>State: 89%</p> </div> </div>	<p>Employment & Enrollment</p> <p>Percentage of grade 12 students employed or enrolled, <i>within Indiana</i>, one year after their expected graduation year. Goal TBD.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>TBD</p> <p>76.9% ▼ 0.5%</p> </div> <div style="text-align: center;">  <p>State: 84.5%</p> </div> </div>
<p>PreK-Grade 2 Literacy</p> <p>Percentage of PreK-Grade 2 students demonstrating progress in essential early reading skills from one year to the next.</p> <p style="text-align: center; color: #95a5a6;">Coming soon</p>	<p>6th Grade Math Growth</p> <p>Percentage of grade 6 students meeting their individual growth targets on the math ILEARN. Goal: 45.8% by 2030.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>19.9% ▲ 3.0%</p> </div> <div style="text-align: center;">  <p>State: 35.1%</p> </div> </div>	<p>College & Career Credentials</p> <p>Percentage of grade 12 students earning high quality college and career credentials. Goal: 60% by 2030.</p> <p style="text-align: center; color: #95a5a6;">No data available</p>	

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XX. Placeholder Appendices for Detailed Research from Task Forces (as needed)

DRAFT