

CDE ESSA draft plan response:

- 1) Section 1, Long Term Goals Academic Achievement – grade level goals (p. 6):
 - a. Sets a 6-year goal based on a baseline year. In last 10 years or more in Colorado, there has not been a consistent 3 year period, let alone 6 year period of using the same test and testing procedures to actually allow for this measurement.
 - b. Appears to set goals that do not allow for growth and progress for all represented groups. Groups performing well above the 53rd percentile (as measured by the baseline year) seem to be expected to “level out” their performance. If the 53rd percentile is a target set relative to the baseline year (so is a static measurement, rather than the dynamic one typically designated by the term Percentile), you seem to be expecting certain groups to perform less well in 6 years. How does this serve those groups?
 - c. Fails entirely to consider, as a group, students performing consistently above academic level (i.e. Gifted and Talented).
 - d. Seems to place unrealistic burden on the group “Children with Disabilities” and their teachers, expecting that group to be brought up to the 6-year standard of 53rd percentile (as relative to the baseline 50th percentile set in the first year). The movement from first to 53rd percentile is quite dramatic, expecting them to demonstrate significantly greater improvement than other groups.
 - e. The entire table seems focused on setting a static target that is identical for all learners. Best practice research shows that not all students learn or perform at the same rate. Best practice research also shows that not all students demonstrate their learning in the same way, so it is completely unrealistic to expect all students to perform to the same standard on standardized tests.
 - f. The entire section seems to focus only on setting one, static goal for an academic area and fails to do anything to demonstrate student growth. Best practice research says that student growth and progress is just as important as particular and static targets of achievement on tests. Growth is mentioned later in the document, but seems to be secondary.
- 2) Section 1, Long Term Goals, Graduation rates (p. 7)
 - a. I admire the desire to improve graduation rates in nearly all categories, though am a bit disturbed by how creating a uniform goal across groups, once again, leaves at least one group with a lower graduation rate in the future.
 - b. Once again, students identified as Gifted and Talented appear to be left entirely out of the equation. GT students, as a group, tend to have a below average graduation rate. Should we not be targeting this group, along with others for improvement?
- 3) Section 3, Academic Assessments (p. 38)
 - a. I am pleased to see some language dealing with advanced learners and potential academic acceleration.

- b. I am less pleased by the complexity of language used and the difficulty in parsing exactly what obligations the schools have towards the needs of accelerated learners. For example, it is unclear if the current difficulties many advanced students have with mathematics requirements are truly met. Middle school students taking advanced math requirements, normally met in high school, should be able to apply those courses towards their high school requirements – and those courses must meet the standards of the high school curriculum (or higher). Currently, some students run into challenges of finding advanced enough course work through their high schools to get the requisite number of courses for graduation, even after completing a rigorous and very advanced series of courses in mathematics.
 - c. The availability of accommodations, including but not limited to academic acceleration, must be part of any ESSA Compliance. EVERY student includes advanced learners, who have too often been left out of these discussions.
 - d. The CDE document appears to only address academic acceleration for Middle School students. What about Elementary and High School students? Gifted learners in those age groups also require the opportunity for acceleration if they are to thrive.
- 4) Section 4, Accountability, Support, and Improvement for Schools, section A Indicators (p. 43)
- a. I am pleased to see that growth is, at least to some degree, factored into the assessments.
 - b. I am concerned about how appropriate assessments are/will be selected. In the last several years there has been very little consistency in the assessments administered across the state. The selection of tests has changed frequently, making establishment of a baseline difficult. In addition, some of the tests have significant questions concerning their real ability to provide meaningful assessment. Many problems with the grade level appropriateness, validity of questions, etc. have been raised, particularly with regards to PARCC, but also for other tests.
 - c. I am concerned about the emphasis placed on Standardized testing. I realize that these tests have the potential to provide meaningful data across a large population. However, the emphasis on these tests the last few decades seems to seriously outstrip their utility in terms of providing quality education. The amount of time devoted to the tests, and the emphasis on the importance of student performance on these tests (thus creating an emphasis on “test preparation”) has robbed students and teachers of valuable instructional time and placed undue emphasis and resource demands on schools for what should be only a small portion of the process of evaluating students and schools.
- 5) General concerns:
- a. I am very concerned that social-emotional support is mentioned ONLY in conjunction with general school climate and for English Learners. No mention is made of insuring proper social-emotional support for other groups shown to need extra support in this area (particularly Gifted and Talented Students, Students with Disabilities, and Twice-Exceptional Learners).
 - b. I am also concerned that Gifted and Talented/Advanced learners seem to be very rarely mentioned and very rarely considered as a group. Research shows that these students

have significant needs in terms of social-emotional support, support for more accelerated learning paths, and supports for their areas of twice-exceptionality. That Twice-Exceptional students are NEVER mentioned in this document is extremely concerning.