



March 10, 2017

Commissioner Katy Anthes
Colorado Department of Education
201 E. Colfax Ave.
Denver, CO 80203

Dear Commissioner Anthes:

As you know, Stand for Children Colorado is a non-profit advocacy organization focused on ensuring that every child has access to a great education that prepares them for success after high school. At the core of our work is a belief in the power of high standards, well prepared and supported educators, fair accountability, clear and transparent information, and parental involvement.

We are writing to submit formal feedback to Colorado's plan for moving forward under the *Every Student Succeeds Act* (ESSA). Our role on both the Hub and Spoke committees gave us a unique opportunity to help shape the plan and share concerns along the way. This letter is intended to underscore what we see as the most important issues and should reflect feedback we offered throughout our involvement in the drafting process. Grounded in the belief that ESSA is civil rights legislation, our comments focus on improving academic outcomes and increasing equity in our state education system.

We appreciate the state's effort to solicit input and incorporate feedback on the ESSA plan. We hope CDE will continue to foster the momentum and stakeholder involvement that has been generated through ESSA to engage with broad stakeholder groups as the plan is iterated and implemented.

Areas of the state plan we support:

Disaggregated subgroup

- The federal statute clearly requires disaggregation of accountability data for all major racial and ethnic groups, which Colorado has not done in the past. The proposed accountability provisions move Colorado in the right direction by, whenever possible, calculating and reporting disaggregated data. Ensuring that parents, schools, and education stakeholders have reliable information about academic outcomes of historically underserved groups of students is critical to addressing gaps and ultimately improving our education system.

Differentiated N-sizes

- The draft plan reasonably suggests a minimum N-size of 16 for school and district achievement calculations and 20 for growth calculations. We appreciate the state's commitment to both maximizing transparency and ensuring student data privacy. We recognize this is an ever-evolving issue, and we hope to be part of any future conversations related to the state minimum N-sizes.

In-field definition

- The state plan appropriately addresses the elimination of the previous “highly qualified” teacher provision in ESSA through its definitions of “effective,” “experienced,” and “in-field.” Although there was a consideration of tying the definition of “in-field” to a requirement for licensure, we believe that the draft plan accurately reflects the intent of this ESSA provision, which is to identify whether students are being taught by educators with subject matter expertise, and whether subgroups of students are disproportionately taught by educators who lack such expertise.

Areas of the state plan we oppose:

Participation rates

- The draft plan provisions regarding student participation in state academic assessments are highly problematic. Not only are they clearly against federal statute which requires states to “Annually measure the achievement of not less than 95 percent of all students, and 95 percent of all students in each subgroup of students, who are enrolled in public schools” SEC. 1005 Section 1111 (c)(4)(E)(i), but they also jeopardize critical information that parents and schools need to make important decisions for their students. Moreover, the proposed policy fundamentally undermines the state accountability system by reducing the validity of achievement and growth data. This has serious consequences for the ability for parents, schools, districts, policymakers, and other education stakeholders to push the state education system toward greater equity and improved outcomes for every child. We urge CDE to count all non-participants in participation calculations rather than removing parent refusals from the participation rates, comply with state statute by using only the statutorily defined accreditation ratings, and enact firm consequences for schools and districts that fall below 95% participation.

Percentile-rank academic achievement target setting

- In recent years, Colorado has rightly moved toward standards-based education and accountability. Unfortunately, our state plan reflects normative measures of student achievement that take us backwards in our progress toward ensuring that all students are ready for life after high school. We ask that the Department reconsider the metrics and cut scores used in the accountability system such that it asks schools and districts to prepare students for college and career success rather than to solely base students’ readiness on their achievement relative to other students.



We know that a plan on its own cannot improve Colorado's education system nor the academic outcomes for every student, which is why we believe that effective, ongoing implementation is critical to realizing the opportunities outlined in ESSA. Therefore, we encourage CDE, with the support and input of education stakeholders, to create an ESSA implementation plan that explicitly creates opportunities for ongoing community engagement.

We recognize the tremendous amount of work necessary to make this happen and hope to be a partner and resource moving forward. Thank you again for the opportunity to play a role in shaping this important plan.

Sincerely,

A handwritten signature in black ink that reads "Jeani Frickey Saito". The signature is written in a cursive, flowing style.

Jeani Frickey Saito
Executive Director, Stand for Children Colorado