

Prior to submitting your comments, we invite you to read [a letter from Commissioner Anthes on Colorado’s ESSA State Plan Development and release of the state plan draft.](#)

## Section 4: Accountability, Support, and Improvement for Schools

*Instructions: Each SEA must describe its accountability, support, and improvement system consistent with 34 C.F.R. §§ 200.12-200.24 and section 1111(c) and (d) of the ESEA. Each SEA may include documentation (e.g., technical reports or supporting evidence) that demonstrates compliance with applicable statutory and regulatory requirements.*

### 4.1 Accountability System.

**A. Indicators.** Describe the measure(s) included in each of the Academic Achievement, Academic Progress, Graduation Rate, Progress in Achieving English Language Proficiency, and School Quality or Student Success indicators and how those measures meet the requirements described in 34 C.F.R. § 200.14(a)-(b) and section 1111(c)(4)(B) of the ESEA.

- The description for each indicator should include how it is valid, reliable, and comparable across all LEAs in the State, as described in 34 C.F.R. § 200.14(c).
- To meet the requirements described in 34 C.F.R. § 200.14(d), for the measures included within the indicators of Academic Progress and School Quality or Student Success measures, the description must also address how each measure within the indicators is supported by research that high performance or improvement on such measure is likely to increase student learning (e.g., grade point average, credit accumulation, performance in advanced coursework).
- For measures within indicators of School Quality or Student Success that are unique to high school, the description must address how research shows that high performance or improvement on the indicator is likely to increase graduation rates, postsecondary enrollment, persistence, completion, or career readiness.
- To meet the requirement in 34 C.F.R. § 200.14(e), the descriptions for the Academic Progress and School Quality or Student Success indicators must include a demonstration of how each measure aids in the meaningful differentiation of schools under 34 C.F.R. § 200.18 by demonstrating varied results across schools in the State.

Indicator	Measure(s)	Description
i. Academic Achievement	Mean scale score	The mean scale score for each state required content assessment in grades 3-11, in English Language Arts, Math and Science is included in the Academic Achievement indicator. This includes both traditional assessments and those aligned to the state’s alternate assessment standards for students with the most significant cognitive disabilities. To ensure that student privacy is maintained, Colorado has transitioned

**Paperwork Burden Statement** According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0576. The time required to complete this information collection is estimated to average 2181 hour per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this collection, please write to: U.S. Department of Education, Washington, DC 20202-4537. If you have comments or concerns regarding the status of your individual submission of this collection, write directly to: Office of Elementary and Secondary Education, U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 20202-3118.

Indicator	Measure(s)	Description
		<p>to the use of mean scale scores. This methodology has several other advantages over percent at benchmark (<a href="#">Polikoff, 2016</a>) and provides similar performance inferences for school accountability.</p> <p>As the state assessments are administered to meet federal requirements, they are subjected to the process of peer review by USDE. This process ensures that assessments used for state summative reporting are aligned with the state’s academic content standards and are “valid, reliable, and consistent with relevant, nationally recognized professional and technical standards for the purposes for which they are used” (<a href="#">USDE, 2015</a>). Colorado submitted the current battery of state assessments for peer review in 2016 and has received ratings of “substantially meets” for all assessments. Colorado will be working with the consortia and the USDE to provide the additional evidence requested.</p> <p>Since all public schools in Colorado annually administer the same required state assessments to all students, the school level results should be comparable statewide.</p>
ii. Academic Progress	Median student growth percentile	<p>The median student growth percentile for each of the CMAS English language arts and Math assessments in grades 4-9 will be included in the Academic Progress indicator. When an aligned system of high school assessments are fully implemented, Colorado plans to report median school growth percentiles for high school grades as well.</p> <p>Colorado has been using student growth percentiles calculated using a quantile regression model for many years. This normative metric describes a student’s observed progress in comparison to his or her academic peers. A number of research papers have been published exploring various facets of the student growth percentile model, its underlying calculations, aggregation possibilities, and uses for making school and district accountability inferences (Betebenner, 2009; Castellano, 2011; Dunn &amp; Allen, 2009; Furgol, 2010). Additionally, the model was approved by USDE for use as part of</p>

Indicator	Measure(s)	Description
		<p>the NCLB growth pilot in 2009, and has been adopted by numerous other states across the country for various accountability and reporting purposes. When used and interpreted appropriately, growth percentiles are a valid measure of student learning and system improvement and demonstrate comparable technical qualities to other measures used for accountability reporting.</p> <p>Growth calculations are based on the required state assessments, so as long as a large and representative enough statewide sample of individuals are included, the student and aggregate results are comparable across all state systems (e.g. schools).</p>
iii. Graduation Rate	4, 5, 6 or 7 year graduation rate	<p>The four-year plus extended year graduation rates indicate the degree to which schools are successful in moving students through the secondary education system and achieving the end-goal of college and career readiness. Colorado values students graduating ready for the next phase of life even if it requires longer than the traditional four-year timeline, which is why the extended year cohorts are also included in the graduation calculation. All schools are required to report student graduation information in a consistent manner ensuring reliability and comparability of results across the state. “As required by state statute (in section 22-2-106, C.R.S.), in September 2015, the Colorado State Board of Education adopted a comprehensive set of guidelines to be used by each school district’s board of education in establishing requirements for students to receive a high school diploma. The guidelines have two purposes. The first is to articulate Colorado’s shared beliefs about the value and meaning of a high school diploma. The second is to outline the minimum components, expectations, and responsibilities of local districts and the state to support students in attaining their high school diploma and in providing evidence to employers, military recruiters, training program and college admission teams that they are ready for the next step after high school.” (CDE, 2016) Holding all students to the same rigorous expectations for post-secondary and workforce readiness is</p>

Indicator	Measure(s)	Description
		intended to ensure the reported graduation rates provide comparable inferences about school success and quality statewide.
iv. Progress in Achieving English Language Proficiency		<p>Colorado applies the same student growth model discussed above to the state’s required English language proficiency assessment (WiDA ACCESS for ELLs). Student growth percentiles are calculated for grades 1-12 and reported as school-level medians for inclusion in accountability calculations. All of the validity, reliability and comparability information discussed for growth in the measures of Academic Progress section above, also applies to the state’s ELP assessment.</p> <p>In addition to the median growth percentile, Colorado intends to include an additional metric for ELP progress gauging the proportion of student’s on-track to attain fluency within the state allotted timeframe. The necessary assessment information is not currently available to set this timeline or progress expectations (see explanation for long-term EL progress goals above), but as soon as possible, Colorado will include this measure of growth-to-a-standard as part of the state accountability framework. Additional validity and comparability will be provided in a future state plan update.</p>
v. School Quality or Student Success-Elementary/Middle Schools*	Reduction in Chronic Absenteeism for Elementary/Middle Schools (Student engagement)	<p><i>Chronic Absenteeism</i> rates are currently being collected as part of the Colorado Department of Education School Discipline and Attendance data submission. The submission includes the reporting of the number of chronically absent students by school both overall and disaggregated by ethnicity/race, gender, special education, English language learner status, and homeless status. Starting with the 2018 data submission, the addition of free and reduced lunch status will need to occur to address the inclusion requirement for the disaggregated income subgroup.</p> <p>The definition provided by CDE to districts regarding chronic absenteeism is as follows: “the unduplicated count of students absent 10% or more of the days enrolled in the public school year during the school year. A student is absent</p>

Indicator	Measure(s)	Description
		<p>if he or she is not physically on school grounds and is not participating in instruction or instruction-related activities at an approved off-grounds location for the school day. Chronically absent students include students who are absent for any reason (e.g. illness, suspension, the need to care for a family member), regardless of whether absences are excused or unexcused. This includes students in grades K-12.”</p> <p>CDE staff in coordination with the state’s Technical Advisory Panel and other stakeholder groups will determine and finalize the methodology used to evaluate the reduction of chronic absenteeism in elementary and middle schools. We anticipate that the methodology will be finalized by the spring of 2018 to ensure that this information can be reported out by the fall of 2018.</p> <p><b>How is it valid? How it is reliable? And comparable across all Local Education Agencies in the state?</b></p> <p>Chronic absenteeism provides an absolute measure of the number of school days that has been missed by a given student during the school year. The validity of this indicator is supported on two grounds: 1) the documented findings from numerous studies suggesting strong linkages between chronic absenteeism and other key indicators of performance and student success such as academic achievement, increase in graduation rates, and the lowering of dropout rates; and, the actionable nature of this indicator for schools to coordinate with the broader community to develop strategies and plans to lower chronic absenteeism. The reliability of the collected data is largely ensured by a consistent reporting methodology, the use of a standardized state definition of <i>chronic absenteeism</i>, and a singular data system that has already been established and used for reporting. However, the accurate reporting of attendance data will need to be continuously monitored by CDE and local education agencies to ensure that this indicator can be deemed over time as both valid and reliable across schools. At this time, we are restricting the reporting of this measure to</p>

Indicator	Measure(s)	Description
		<p>elementary and middle schools. Although this indicator is considered by researchers to be important in high schools, this will not be applied and/or considered for the high school level until consistent reporting methods are established for determining absences for high schools. Also, additional stakeholder feedback will be considered before operationalizing this measure at the high school level.</p> <p>The reporting of chronic absenteeism is being required for the first time during the 2016-2017 school year as part of the School Discipline and Attendance data submission for every Colorado public school. This requirement will establish a comparable system both longitudinally and between local education agencies. Similarly, the U.S. Department of Education, Office for Civil Rights now requires states to report a measure of chronic absences. Thus, the obtained chronic absenteeism data will be comparable across LEAs and between states.</p> <p><b>How is chronic absenteeism supported by research that demonstrates high performance or improvement on such measure is likely to increase student learning?</b></p> <p>A number of research studies have demonstrated a relationship between chronic absenteeism and a variety of learning and performance outcomes including achievement, graduation rates and dropout rates. For achievement, studies indicate that chronic absenteeism is negatively associated with proficiency rates (see Goodman, 2014; Liu &amp; Loeb, 2016; Schanzenbach, Bauer &amp; Mumford; 2016). Additionally, other studies indicate that chronic absenteeism is also negatively associated with graduation rates and positively associated with dropout rates (see Balfanz &amp; Byrnes, 2012; Whitney, Camille, &amp; Liu, 2016). A key takeaway point across these research studies is that schools that have systematically lower rates of graduation, higher rates of dropouts and lower rates of proficiency are likely to also suffer from high levels of chronic absenteeism. That, is, these students are, on average, receiving far less exposure to</p>

Indicator	Measure(s)	Description
		<p>instructional time relative to other peers in schools with lower chronic absenteeism rates.</p> <p><b>How does chronic absenteeism aid in the meaningful differentiation of schools under 34 C.F.R. § 200.18 by demonstrating varied results across schools in the State.</b></p> <p>Chronic absenteeism has been shown to vary among schools at the district and state levels. These variations likely represent meaningful differences in student success (see CORE district experiences at: <a href="http://coredistricts.org/why-is-core-needed">http://coredistricts.org/why-is-core-needed</a>). As indicated by researchers and organizations focused on reducing chronic absenteeism, the information captured by this indicator also presents an opportunity for schools to develop varied and targeted approaches to reduce chronic absenteeism. Schools suffering from higher and systematic levels of chronic absenteeism will likely need to take a multi-pronged approach to work closely with community groups and parents to address behaviors that may reduce chronic absences. Whereas schools with substantially lower levels or isolated cases of chronic absences may only need to establish closer ties with individual parents or guardians to ensure that those students are following through with required school work to ensure that these absences do not adversely impact academic performance.</p>
vi. School Quality or Student Success – High Schools*	Dropout rates (PWR)	<p>Dropout rate has been a key indicator of high school quality in Colorado for many years. Preventing students from dropping out is crucial for ensuring that students are truly college and career ready. Students who drop out of high school are unlikely to re-enter and complete high school (<a href="#">REL West, 2008</a>), which leaves them unable to pursue postsecondary education or career paths. Failure to complete high school, either by earning a high school diploma or through an alternate pathway, greatly constrains that individual's work choices and earning potential (<a href="#">US. Census Bureau, 2002</a>). These individuals are more likely than peers who completed high school to live in poverty (<a href="#">NCES, 2011</a>).</p>

Indicator	Measure(s)	Description
		<p>The Colorado dropout rate is defined as an annual rate, reflecting the percentage of all students enrolled in grades 7-12 who leave school during a single school year without subsequently attending another school or educational program. It is calculated by dividing the number of dropouts by a membership base which includes all students who were in membership any time during the year. In accordance with a 1993 legislative mandate, beginning with the 1993-94 school year, the dropout rate calculation excludes expelled students.</p> <p><b>How is it valid? How it is reliable? And comparable across all Local Education Agencies in the state?</b></p> <p>The dropout rate serves as a direct measure of the extent to which schools are meeting postsecondary and workforce outcomes. In effect, reduced college-going rates and workforce opportunities have been shown to be tightly linked to high school completion. The reliability of the collected data is ensured by a consistent reporting methodology, established operational definitions of the constructs, and a single data submission system for reporting. The chosen metric is uniformly administered and reported on within a required end-of-year submission by local education agencies to facilitate comparisons. The state conducts checks for students, across Colorado school districts, to improve the accuracy of the data.</p> <p><b>Address how research shows that high performance or improvement on the indicator is likely to increase graduation rates, postsecondary enrollment, persistence, completion, or career readiness.</b></p> <p>The validity argument for the inclusion of dropout rates is based on the body of research literature that demonstrates life outcomes are enhanced by college and/or career education opportunities resulting from high school completion (<a href="#">REL West, 2008</a>).</p>



Indicator	Measure(s)	Description
		<p>A large body of research supports the positive relationship observed between college going and workforce outcomes based on high school completion (<a href="#">2008</a>). The identification of students at-risk of dropping out can lead to the implementation of remediation approaches that reduce drop-out rates and improve future life opportunities (<a href="#">Educational Testing Service, 2012</a>). Similarly, monitoring change in dropout rates over time can serve as a measure of the effectiveness of intervention strategies</p> <p>The responses taken by schools to improve upon dropout rates would likely vary depending on the outcomes relative to context. In some cases, interventions would require increased wrap-around supports and community assistance in connection with academic supports, and in other cases, the intervention may require improvements to the academic programs instituted. Regardless of strategies selected, the larger objective is to ensure that the educational system is continuously improving to lead to more equitable opportunities and outcomes across all students.</p> <p><b>How each measure aids in the meaningful differentiation of schools under 34 C.F.R. § 200.18 by demonstrating varied results across schools in the State.</b></p> <p>Collected data have shown that dropout rates vary among schools and districts within Colorado (see <a href="#">CDE, 2015</a>). These variations should drive different pathways and strategies for schools to take in coordination with parents and the larger community to ensure that all students are given the opportunity to better access workforce or post-secondary options after high school.</p>

Note. ‘\*’: The successful implementation of an ‘other indicator’ requires sufficient time, resources, and reporting infrastructure to lead to the implementation of robust measures in both the short-term and long-term. The aforementioned short-term recommendations (i.e. 2018 inclusion) serves to bring forward meaningful data that is already available and removes the need for additional data collection. The long-term plan allows CDE and education stakeholders to examine school climate, PWR and social-emotional learning metrics at a deeper level to determine how to best address the needs of Colorado citizens. For full implementation to occur during the fall of 2017, all supporting data would

need to be collected currently. Similarly, any new measures or tools would need to be in place. In order to improve the feasibility and relevance of recommendations we are anticipating a fall 2018 rollout to address short-term recommendations to be followed by a later roll-out of our long-term measures following a period of stakeholder work and tool development. The accountability work group, which is composed of a wide-range of education stakeholders, will be convened again during the spring of 2017. The membership includes professional organization representatives, advocacy group representatives, teachers, parents, and district administrators. The workgroup will develop preliminary long-term recommendations for the ‘other’ indicator during the spring and summer of 2017. The recommendations will be shared with the public no later than the fall of 2017. Feedback will be obtained via survey and focus groups. Based on the feedback, the workgroup will develop a final set of recommendations to bring to the Colorado State Board of Education no later than June 2018.

The following measures/metrics will be considered for the long-term:

- For climate, school safety, parent, student and educator satisfaction, and/or other engagement indicators will be considered.
- For postsecondary and workforce readiness, the possible development of workforce readiness specific indicators, such as completion of advanced coursework, students graduating with college credit and/or industry credential, and/or post-graduation employment will be investigated.
- For social-emotional learning measures, discussion time is required for defining possible indicators and determining what may be appropriate for inclusion for state accountability.

## **B. Subgroups.**

- i. List the subgroups of students from each major and racial ethnic group in the State, consistent with 34 C.F.R. § 200.16(a)(2), and, as applicable, describe any additional subgroups of students used in the accountability system.  
Free or Reduced-Price Meal Eligible, Students with Disabilities (IEPs), and English Learners, as well as student from each major race/ethnic group (White, Hispanic, Black, Asian, American Indian/Alaska Native, Hawaiian/Pacific Islander, Two or more races), when each listed race/ethnic group meets the minimum N. If any of the individual disaggregated race/ethnic groups are too small to meet the minimum N separately, a combined group will be created to include the students from the remaining non-white groups not represented separately, as long as the combined group also meets the minimum N. For example, if all race/ethnic groups can be included separately except the American Indian/Alaska Natives and Hawaiian/Pacific Islander, those two groups will be combined and their combined data would be used, if they meet the minimum N.
- ii. If applicable, describe the statewide uniform procedure for including former children with disabilities in the children with disabilities subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(b), including the number of years the State includes the results of former children with disabilities.  
Children formerly identified as having an Individualized Education Plan (IEP) are not currently included in the Students with Disabilities subgroup; however Colorado plans to

pilot the change in upcoming years with the Administrative Units (Special Education LEAs).

- iii. If applicable, describe the statewide uniform procedure for including former English learners in the English learner subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(c)(1), including the number of years the State includes the results of former English learners.

Colorado English learners previously identified as Limited-English Proficient (LEP), who have been redesignated as Fluent-English Proficient (FEP), will continue to be included in the accountability calculations for the EL subgroup for an additional four years after redesignation (Monitor Year 1, Monitor Year 2, Exit Year 1, Exit Year 2). If a student previously redesignated as FEP is determined to need additional language instruction services, the student will return to being classified as LEP.

- iv. If applicable, choose one of the following options for recently arrived English learners in the State:

- Exception under 34 C.F.R. § 200.16(c)(3)(i) or  
 Exception under 34 C.F.R. § 200.16(c)(3)(ii) or  
 Exception under section 1111(b)(3) of the ESEA and 34 C.F.R. § 200.16(c)(4)(i)(B). If selected, provide a description of the uniform procedure in the box below.

If a student has been enrolled in a US school for less than 12 months and is classified as **Non-English Proficient (NEP)**- based on the WiDA screener and local body of evidence- he or she is **exempt** from taking the CMAS PARCC ELA assessment. A student's parents can opt the child into testing if they choose, and the score results will be used for accountability and growth calculations. If a student has been enrolled in a US school for less than 12 months and is classified as **Limited-English Proficient (LEP) or Fluent-English Proficient (FEP)**- based on the WIDA screener and local body of evidence- he or she should be **assessed** on the CMAS PARCC ELA assessment.

### C. Minimum Number of Students.

- i. Provide the minimum number of students for purposes of accountability that the State determines are necessary to be included in each of the subgroups of students consistent with 34 C.F.R. § 200.17(a).

The minimum number to be used for accountability is 16 students for achievement and graduation rate indicators, and 20 students for growth indicators.

- ii. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for purposes of accountability, provide that number consistent with 34 C.F.R. § 200.17(a)(2)(iv).

The same minimum number of students will be used for purposes of accountability and reporting.

- iii. Describe how the State's minimum number of students meets the requirements in 34 C.F.R. § 200.17(a)(1)-(2);

In order to protect the privacy of individual students, Colorado previously established a minimum of 16 students for all measures of student achievement, and for all measures of post-secondary and workforce readiness (including graduation rates). When initially establishing the use of median student growth percentiles for accountability reporting, however, Colorado determined that a minimum of 20 students was necessary to ensure

adequate cross-year stability of growth indicator ratings.

In order to ensure that, to the extent practicable, each subgroup of students can be included at the school level, while providing for statistically reliable information, Colorado will maintain a minimum of 16 students for achievement and graduation rate indicators (as opposed to increasing to 20 students) and a minimum of 20 students for growth indicators. To meet the requirements in 34 C.F.R. § 200.17(a)(i), the same minimum number will be used for all students and for each subgroup of students.

- iv. Describe how other components of the statewide accountability system, such as the State's uniform procedure for averaging data under 34 C.F.R. § 200.20(a), interact with the minimum number of students to affect the statistical reliability and soundness of accountability data and to ensure the maximum inclusion of all students and each subgroup of students under 34 C.F.R. § 200.16(a)(2);

For accountability reporting, Colorado follows the standard methodology for calculating means directly from student-level scores up to the required systems level (school, district, state, etc.). When combining data across years or grade levels, the same student-to-aggregate methodology is applied. This ensures that each student with a valid outcome measure who meets the inclusion requirements contributes the same weight to the overall calculation (regardless of grade level or data collection year). This applies to all accountability calculations other than growth (discussed next) at both the aggregated and subgroup levels.

For all academic progress metrics, Colorado reports the median student growth percentile. Mean and median are both measures of central tendency and for most applicable situations result in similar inferences about school performance. However, since medians are slightly less susceptible to outliers and were the original descriptive statistic reported for all growth percentile results, Colorado will continue to report system-level medians for the Academic progress measures.

While means and medians based upon very small sample sizes often show extreme volatility across time, Colorado has found that a minimum N of 16-20 students ensures a reasonable level of stability for accountability reporting. It is less likely that extreme outliers will skew the mean outcome when 16-20 or more students contribute to the system-level calculation. Additionally, the minimum N of 16 ensures student privacy and that in the achievement and growth metrics CDE is reporting it is exceedingly difficult to identify the performance of any individual child. Aggregating data across grade levels and years (when multiple years of assessment data become available) greatly increases the number of systems that can be included for accountability reporting. While requiring a minimum N of 30 students would potentially increase the stability of results even more, any gains are offset by the loss of systems and students that would no longer be reported. Colorado has a large number of very small schools that have student enrollments hovering between 16 and 30. Even more schools have subgroup enrollments that fall in this range and would be excluded from reporting if Colorado were to increase the minimum N requirement. There are no anticipated interactions between the calculation methodologies and the minimum N requirement that would have an appreciable negative impact on the statistical reliability or soundness of the data being reported for accountability purposes.

- Describe the strategies the State uses to protect the privacy of individual students for each purpose for which disaggregated data is required, including reporting under section 1111(h) of the ESEA and the statewide accountability system under section 1111(c) of the ESEA;

For 2016 achievement data, the state applied:

- A minimum group n-size of 16
- A minimum performance level cell size of 4
- Complementary suppression across subgroups and across schools

Colorado takes privacy of individual student data very seriously and engages in ongoing refinement of our public reporting practices. In addition to applying the historical minimum N of 16 at the group level, Colorado has recently begun applying complementary suppression across groups and, after consulting with the Privacy Technical Assistance Center (PTAC) out of the U.S. Department of Education, minimum n-sizes for individual performance levels. The simplest application of complementary suppression is requiring that for two variable groups such as gender, both groups must meet the minimum n of 16 to report out either subgroup. In other words, both the male subgroup and the female subgroup must include at least 16 students in order to report either subgroup's performance information based on performance levels. This practice precludes the public from being able to simply subtract one subgroup from the total to ascertain the performance of the other subgroup that may not have met the minimum n of 16. In our reports that display the percent of students at or above benchmark, the application of a minimum cell size of 4 has resulted in Colorado suppressing data for groups and schools who do not have at least 4 students at or above benchmark. Complementary suppressions across groups are also applied in these cases. As a result of these practices, Colorado has one of the most conservative public reporting approaches in the country. The chances for individual student assessment performance level information to be calculated or inferred in Colorado has dropped dramatically.

These new reporting rules are very important for protecting student privacy; however they posed challenges for accountability. These rules resulted in many schools and districts not only having less subgroup reporting but also less overall reporting. Colorado determined that if the accountability system was to have integrity, it had to be based on publicly available data. After consulting with its Technical Advisory Panel, CDE determined that the use of alternative metrics better allowed for more public reporting without threatening student privacy. While Colorado will continue to report out school and district performance based on proficiency levels for public posting, Colorado chose to use mean scale score as its achievement measure and the median student growth percentile as its growth measure, if the minimum N is met, for accountability. This allows for significantly more schools/districts and subgroups to be reported within the accountability system because determining the performance of an individual student when the minimum n is met becomes virtually impossible when mean scale score is used. CDE is able to hold more schools and districts accountable and report data for an increased number of student groups when using the mean scale score than if percent at or above benchmark were used. CDE believes this increased transparency better supports the goals of ESSA. Colorado minimum N of 16 for achievement also ensures that student data privacy is not violated.

As indicated above, Colorado will continue to refine its reporting practices in its attempt to strike the appropriate balance between protecting individual student data privacy and school/district performance transparency.

- v. Provide information regarding the number and percentage of all students and students in each subgroup described in 4.B.i above for whose results schools would not be held accountable

under the State's system for annual meaningful differentiation of schools required by 34 C.F.R. § 200.18;

In order to include as many students as possible in the accountability system, particularly students from disaggregated groups, Colorado uses three years of aggregated data when a school has too few students in any given group. Although not all schools receive a state accountability rating based on three years of data, Colorado does aggregate data across years for schools that do not meet the minimum number of students using a single year of data. Using data aggregated across three years reduces the number of schools, and subsequently the number of students, that would not be included in the accountability system.

Due to recent changes in state assessments, three years of CMAS PARCC data are not currently available for analyses in response to this question. Therefore, Colorado used historical achievement data to evaluate the impact of the minimum N when using three years of data. Specifically, 2014 math achievement data from the TCAP assessment, aggregated across three years (2012, 2013, and 2014), was used. Alternative education campuses (AECs) were excluded, and these calculations represent the approximate number and percentage of students in a single year for whose results schools would not be held accountable.

Less than 0.1% of all students with valid scores (approximately 100 students) would be excluded. Schools would not be held accountable for approximately 903 English learners (1.1% of all English learners with a valid score) and 350 economically disadvantaged students (0.2% of all students eligible for free or reduced price meals [with a valid score]). Approximately 1.8% of students with disabilities (870 students) and 0.2% of non-white students (450 students) with valid scores would be excluded.

The largest numbers and percentages of students excluded occur as a result of the disaggregation of students by each major racial and ethnic category. Using a "non-white students" group helps ensure maximum inclusion of students who are in racial/ethnic categories that would otherwise not be reported. If individual racial and ethnic categories are used instead of a "non-white students" group, schools would not be held accountable for the following number and percentage of students with valid scores: 2,130 American Indian or Alaska Native students (60.0%), 1,640 Asian students (10.8%), 1,831 Black students (8.7%), 550 Hispanic students (0.4%), 320 White students (0.1%), 870 Hawaiian/Pacific Islander students (86.0%), and 1,960 students of two or more races (12.9%).

Due to the significant number of students being excluded, Colorado will be adding an additional step to the inclusion of the students from each major race/ethnic group. For accountability determinations, any major race/ethnic group with a large population of students to meet the minimum N will have the data for each of those groups disaggregated and schools will be held accountable for the performance of each of the groups. Any remaining non-white students from race/ethnic groups that do not meet the minimum N on their own will be combined into one group for accountability purposes. If the combined group of remaining non-white students meets the minimum N, the school would be held accountable for the performance of the combined group, in addition to the performance of each of the race/ethnic groups that meet the minimum N separately.

This additional step is estimated to add over 5,000 students back into the accountability system, including an estimated 1,010 American Indian or Alaska Native, 1,191 Asian, 1,083 Black, 400 Pacific Islander, and 1,342 students from two or more races. These estimates were

projected using 2016 data multiplied by three in order to estimate using three years of data (this method of estimation was used because only 2016 PARCC results are currently available for use).

- vi. If an SEA proposes a minimum number of students that exceeds 30, provide a justification that explains how a minimum number of students provided in 4.C above promotes sound, reliable accountability determinations, including data on the number and percentage of schools in the State that would not be held accountable in the system of annual meaningful differentiation under 34 C.F.R. § 200.18 for the results of students in each subgroup in 4.B.i above using the minimum number proposed by the State compared to the data on the number and percentage of schools in the State that would not be held accountable for the results of students in each subgroup if the minimum number of students is 30.

N/A

**D. Annual Meaningful Differentiation.** Describe the State’s system for annual meaningful differentiation of all public schools in the State, including public charter schools, consistent with the requirements of section 1111(c)(4)(C) of the ESEA and 34 C.F.R. §§ 200.12 and 200.18. All public schools, including Charter schools, except for those explicitly addressed below, will be evaluated using the same state-wide accountability system. To ensure that each measure allows for and contributes to the meaningful differentiation among schools, Colorado creates a percentile ranking distribution of the school outcomes. Within each measure Colorado creates four distinct performance bands with cut-scores at the 15<sup>th</sup>, 50<sup>th</sup>, and 85<sup>th</sup> percentiles. Points are assigned to each performance band, with better scores resulting in more points. Using measures that show roughly normal school-level distributions and applying this normative methodology ensures that all measures are identifying comparable proportions of the population of schools for each performance band. The points for each measure are aggregated to give indicator totals which are then weighted to provide an overall score (percent of total points earned out of total points eligible). Baking in meaningful differentiability at the measure level results in indicator and total point aggregations that accurately distinguish between higher and lower performing school systems. Additional explanation will be provided around the supplementary steps required to ensure that meaningful differentiation is also possible for Alternative Education Campuses.

*Describe the following information with respect to the State’s system of annual meaningful differentiation:*

The distinct and discrete levels of school performance, and how they are calculated, under 34 C.F.R. § 200.18(a)(2) on each indicator in the statewide accountability system;

- i. For ESSA reporting, CDE will have three discrete performance determinations: “Comprehensive Support and Improvement,” “Targeted Support and Improvement,” and “Neither.” The information about how those determinations are calculated is listed in section 4.2.
- ii. The weighting of each indicator, including how certain indicators receive substantial weight individually and much greater weight in the aggregate, consistent with 34 C.F.R. § 200.18(b) and (c)(1)-(2).  
Colorado has not yet determined the exact weightings that will be used for accountability

determinations. In 2016, for elementary and middle schools 40% of points came from Academic Achievement measures and 60% from Academic Growth measures, while for high school the weighting was 30% Academic Achievement, 40% Academic Growth and 30% Postsecondary and Workforce Readiness. Once the Colorado State Board of Education decides on the relative weights between indicators, CDE will update the state plan with this information.

- iii. The summative determinations, including how they are calculated, that are provided to schools under 34 C.F.R. § 200.18(a)(4).  
The calculation methodologies for the summative determinations of “Comprehensive Support and Improvement,” “Targeted Support and Improvement,” and “Neither” are described in section 4.2. Please see below.
- iv. How the system for meaningful differentiation and the methodology for identifying schools under 34 C.F.R. § 200.19 will ensure that schools with low performance on substantially weighted indicators are more likely to be identified for comprehensive support and improvement or targeted support and improvement, consistent with 34 C.F.R. § 200.18(c)(3) and (d)(1)(ii).  
The description of how the indicators are used and weighted to identify “Comprehensive Support and Improvement” and “Targeted Support and Improvement,” in accordance with the ESSA requirements, is included in section 4.2. Please see below.

**E. Participation Rate.** Describe how the State is factoring the requirement for 95 percent student participation in assessments into its system of annual meaningful differentiation of schools consistent with the requirements of 34 C.F.R. § 200.15.

To help ensure that all students participate in state-administered assessments, CDE will:

1. Calculate disaggregated state assessment participation rates for all schools and districts and disaggregated groups
2. Report state-administered assessment participation rates and assessment results for all schools and districts and disaggregated groups
3. Require schools and districts that fall below 95% participation (based on the accountability participation rate\*) in one or more of the state administered English Language Arts or Math assessments to address their low participation rates as part of an improvement plan, including actions that schools and districts will take in response to their low participation rates.
4. Include low accountability participation rates\* as an indicator in ESSA Program Reviews conducted with school districts and BOCES that have schools that have been identified for comprehensive and targeted support and improvement schools or schools with accountability participation rates below 95%.
5. Provide information to schools and districts with low assessment participation rates to share with their communities regarding the state assessments, including reasons for administering the assessments and how the results are used.

\* The accountability participation rate is the participation rate for a school/district/disaggregated group that removes parent excusals from the denominator. Per Colorado state law, districts must have



a policy in place to allow parents to excuse their students from the state assessments. Additionally, schools and districts “shall not impose negative consequences, including prohibiting school attendance, imposing an unexcused absence, or prohibiting participation in extracurricular activities, on the student or on the parent.” The Colorado State Board of Education passed a motion in February 2015 stating that CDE shall not hold schools and districts liable for the choices that parents make to excuse their students from the state assessments. As a result, in Colorado, any accountability implications for participation are focused on the accountability participation rate, which does not hold schools or districts liable for parent decisions with regard to student participation in the state assessment.

- F. Data Procedures.** Describe the State’s uniform procedure for averaging data, including combining data across school years, combining data across grades, or both, in a school as defined in 34 C.F.R. § 200.20(a), if applicable.

For accountability reporting, Colorado follows the standard methodology for calculating means directly from student-level scores up to the required systems level (school, district, state, etc.). When combining data across years and/or grade levels, the same student-to-aggregate methodology is applied. This ensures that each student with a valid outcome measure who meets the inclusion requirements contributes the same weight to the overall calculation (regardless of grade level or data collection year). This applies to all accountability calculations other than growth (discussed next) at both the aggregated and subgroup levels. For all academic progress metrics, Colorado reports the median student growth percentile. Mean and median are both measures of central tendency and for most applicable situations result in similar inferences about school performance. However, since medians are slightly less susceptible to outliers and were the original descriptive statistic reported for all growth percentile results, Colorado will continue to report system-level medians for the Academic progress measures.

- G. Including All Public Schools in a State’s Accountability System.** If the States uses a different methodology for annual meaningful differentiation than the one described in D above for any of the following specific types of schools, describe how they are included, consistent with 34 C.F.R. § 200.18(d)(1)(iii):

- i. Schools in which no grade level is assessed under the State's academic assessment system (e.g., P-2 schools), although the State is not required to administer a standardized assessment to meet this requirement;

These schools would be identified as “neither” since the data and requirements for identifying Comprehensive and Targeted Support and Improvement schools are not applicable at the P-2 level.

- ii. Schools with variant grade configurations (e.g., P-12 schools);

Schools with variant grade configurations within the state tested grade ranges are all included in the system to identify Comprehensive and Targeted Support and Improvement or “neither” schools, as they have the required data sources.

- iii. Small schools in which the total number of students who can be included in any indicator under 34 C.F.R. § 200.14 is less than the minimum number of students established by the State under 34 C.F.R. § 200.17(a)(1), consistent with a State’s uniform procedures for averaging data under 34 C.F.R. § 200.20(a), if applicable;

These schools would be identified as “neither” since the data and requirements for identifying Comprehensive and Targeted Support and Improvement schools are not available given the schools’ measures do not meet the minimum N reporting requirement (based on 3 years of data).

- iv. Schools that are designed to serve special populations (e.g., students receiving alternative programming in alternative educational settings; students living in local institutions for neglected or delinquent children, including juvenile justice facilities; students enrolled in State public schools for the deaf or blind; and recently arrived English learners enrolled in public schools for newcomer students); and

Alternative Education Campuses, as designated by Colorado state law (C.R.S. 22-7-604.5) will first be evaluated according to the same measures and indicators as all other schools. As we expect that as the general statewide accountability system will not meaningfully differentiate between Alternative Education Campuses, we will implement an additional system of specific measures to further differentiate these schools into those needing Comprehensive Support and Improvement, Targeted Support and Improvement, or “neither” based on state law for alternative accountability measures for these schools. This additional system will use measures that are relevant to Alternative Education Campuses’ programs and outcomes, such as: specific local measures of academic achievement and progress, high school completion rates, attendance rates, and truancy rates. The plan types that result from this additional system of specific measures will then be used to aid in the meaningful differentiation of all schools in the State; that is, an Alternative Education Campus’ plan type on this set of measures will be used to allocate resources and support rather than its initial rating on the single statewide accountability system.

- v. Newly opened schools that do not have multiple years of data, consistent with a State’s uniform procedure for averaging data under 34 C.F.R. § 200.20(a), if applicable, for at least one indicator (e.g., a newly opened high school that has not yet graduated its first cohort for students).

Consistent with the definitions for identifying Comprehensive and Targeted Support and Improvement schools, three years of data are required for identification. Due to transitions in state assessments, Colorado will identify schools for Comprehensive and Targeted for the 2017-2018 school year, using two years of data. Starting with the 2018-2019 school year, three years of data will be used for identification of schools. Schools without sufficient years of data would be identified as “neither” until such time as data indicates otherwise.

## 4.2 Identification of Schools.

### A. Comprehensive Support and Improvement Schools. Describe:

- i. The methodologies, including the timeline, by which the State identifies schools for comprehensive support and improvement under section 1111(c)(4)(D)(i) of the ESEA and 34 C.F.R. § 200.19(a) and (d), including: 1) lowest-performing schools; 2) schools with low high school graduation rates; and 3) schools with chronically low-performing subgroups.

<i>Colorado will use the following process and timeline to identify schools for each type of comprehensive support and improvement.</i>
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1) Lowest-performing schools: Using the summative rating from the statewide accountability system for meaningful differentiation of schools, Colorado will annually rank order all schools based on the total percentage of points earned on the accountability system for each school. Title I schools with the lowest total points earned will be identified as the lowest-performing schools to include a minimum of 5% of all Title I schools.

Schools will be identified every August based on data from the three years preceding identification. Due to recent transitions on state assessments and the accountability hold which was in place in 2015-2016, for the first cohort of comprehensive schools in 2017-2018, identification of schools will be based on two years of data. Moving forward and when available, three years of data will be used for identification of schools.

2) Schools with low high school graduation rates: Colorado will annually identify all public schools with a four-year, plus the extended year, graduation rate below 67% for Comprehensive Support and Improvement, in alignment with the graduation rates used in the statewide accountability system. Colorado honors and recognizes high schools that continue to work with students that need additional time to graduate (for example, students with disabilities, dually enrolled students) as well as high schools that are based on a five year plan, where students graduate with an associate's degree. Therefore, Colorado will utilize the discretion afforded states to add the use of extended year graduation rates in the accountability system.

For high schools that meet the criteria for an Alternative Education Campus (AEC), Colorado will identify any AEC high school that has a 4-year, plus extended year completion rate below 67% for Comprehensive Support and Improvement.

Three years of graduation data will be used for identifying schools for Comprehensive Support and Improvement.

Beginning with the 2018-2019 school year (as allowed under 20 C.F.R. §200.19(d)), schools will be identified every August using the most recently available graduation rates, which will be two years prior to identification. For example, in 2018-2019 schools will be identified using graduation rates from 2016-2017, 2015-2016 and 2014-2015 because the preceding year data will not be available at that time.

3) Schools with chronically low-performing subgroups: Using the same methodology that is used to identify the lowest performing 5% of Title I schools, schools will be ranked based on the performance of each student group (i.e., economically disadvantaged students, students from each major racial and ethnic group, students with disabilities, or English learners). Schools will be identified for additional targeted support when a school has *not* been identified as Comprehensive Support and Improvement based on being in the lowest performing five percent of Title I schools *but* has at least one student group that performs in the lowest five percent (i.e., in the 5<sup>th</sup> percentile rank or lower).

Schools that have been identified for Additional Targeted Support and Improvement determinations for four consecutive years, who have not shown improvements in the performance of the low-performing subgroup(s) for which they have been identified, are Title I funded and have not been identified for Comprehensive Support and Improvement as a

lowest five percent school will be moved to the Comprehensive Support and Improvement category.

The first year that schools identified for Additional Targeted Support and Improvement will be eligible for Comprehensive Support and Improvement will be in 2020-2021.

- ii. The uniform statewide exit criteria for schools identified for comprehensive support and improvement established by the State, including the number of years over which schools are expected to meet such criteria, under section 1111(d)(3)(A)(i) of the ESEA and consistent with the requirements in 34 C.F.R. § 200.21(f)(1).

Once identified for Comprehensive Support and Improvement, schools will remain on the list for three years, regardless of student group performance, to allow schools to implement improvement strategies and sustain performance before supports are reduced or terminated.

The uniform exit criteria for each type of Comprehensive Support and Improvement school is that each of those schools will no longer meet the identification criteria that resulted in the school being identified for Comprehensive Support and Improvement after three (3) years.

**B. Targeted Support and Improvement Schools.** Describe:

- i. The State’s methodology for identifying any school with a “consistently underperforming” subgroup of students, including the definition and time period used by the State to determine consistent underperformance, under 34 C.F.R. § 200.19(b)(1) and (c).

Colorado will use the following indicators for annually evaluating the performance of disaggregated groups: English language arts achievement, math achievement, English language arts growth, math growth, the other indicator of school quality and student success (when available), graduation rates (high schools only) and English language proficiency growth (for schools with a large enough population of English learners).

Achievement		Growth		ELP Progress	Graduation Rate	Other Indicator
English Language Arts	Math	English Language Arts	Math	ACCESS Growth		When Available
N≥16	N≥16	N≥20	N≥20	N≥16	N≥16	TBD

Each student group (i.e., economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, and English learners) earns a rating for each of the specific measures in the accountability system.

Consistently underperforming is defined as earning the lowest rating on all specified indicators for a given student group based on aggregated three year performance, when the student group meets the minimum N for that indicator.

Beginning with the 2019-2020 school year (as allowed under 20 C.F.R. §200.19(d)), schools will be identified every August based on data from the three years preceding identification.

- ii. The State’s methodology, including the timeline, for identifying schools with low-performing subgroups of students under 34 C.F.R. § 200.19(b)(2) and (d) that must receive additional targeted support in accordance with section 1111(d)(2)(C) of the ESEA.

Using the same methodology that is used to identify the lowest performing 5% of Title I schools, schools will be ranked based on the performance of each student group (i.e., economically disadvantaged students, students from major racial and ethnic groups, students with disabilities, or English learners). Schools will be identified for additional targeted support when a school has *not* been identified as Comprehensive Support and Improvement based on being in the lowest performing five percent of Title I schools *but* has at least one student group that performs in the lowest five percent (i.e., in the 5<sup>th</sup> percentile rank or lower).

Three years of data will be used for identification. Using only 2 years of data would automatically exclude between 84 and 253 schools due to small N sizes for each of the student groups. For example, 166 elementary schools would be eliminated from calculations due to small population of students with disabilities and across all grade spans, 253 schools would not have a large enough population of students with disabilities to be included in the calculations, compared to the numbers that would be included if three years of data are used for school identification. Therefore, including 3 years of data allows for assessing consistent underperformance of students groups in more schools.

Beginning with the 2018-2019 school year (as allowed under 20 C.F.R. §200.19(d)), schools will be identified each August based on data from the three years preceding identification.

- iii. The uniform exit criteria, established by the SEA, for schools participating under Title I, Part A with low-performing subgroups of students, including the number of years over which schools are expected to meet such criteria, consistent with the requirements in 34 C.F.R. § 200.22(f).

The uniform exit criteria for schools identified for *additional targeted support* is that schools no longer meet the identification criteria after three (3) years. Colorado will be monitoring and evaluating the amount of time necessary to support schools identified for additional targeted support and will revisit and possibly revise this timeline after three years of data have been collected.

### 4.3 State Support and Improvement for Low-performing Schools.

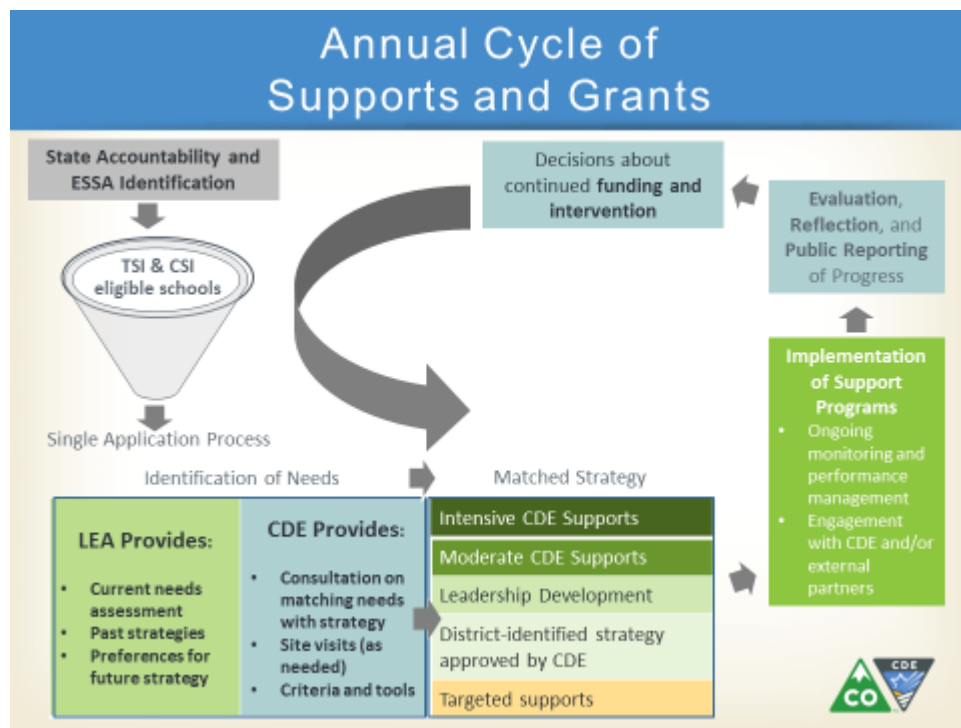
Overview:

- A. **School Improvement Resources.** Describe how the SEA will meet its responsibilities, consistent with 34 C.F.R. § 200.24(d) under section 1003 of the ESEA, including the process to award school improvement funds to LEAs and monitoring and evaluating the use of funds by LEAs.

The state will award school improvement (1003a) funds to LEAs in a manner that strategically allocates resources – financial and programmatic – to identified schools using a “needs-based approach.” This new approach has been designed to: maximize impact on student learning; incentivize innovative and bold ideas; create fair and transparent processes; increase efficacy and efficiency; and providing fairness and predictability to LEAs.

Under ESSA, Colorado will consolidate multiple 1003 grant applications into one annual single application process for schools designated as Comprehensive Supports and Intervention (Comprehensive) and Targeted Supports and Intervention (Targeted). The process matches identified needs with differentiated services and grants dollars (see figure 1) for a three-year period.

Figure 1. Annual Cycle of Supports and Grants



Identification of Needs. The matching and awarding process will extend over a longer period of time (e.g., a couple of months), to enable the schools, districts and state to thoroughly explore the best way to match the needed supports and the appropriate amount of funding. Criteria for matching LEA needs for supports and funding will include (but not be limited to): the likelihood and ability of a school to leverage supports and grants to effect dramatic and quick impacts on student learning; the capacity and willingness of districts to engage in meaningful change; the local context of geography, leadership, and the state accountability system; stakeholder and community engagement; and the capacity of the state to provide needed supports. Selection and matching will

build upon self-assessment and external diagnostics (e.g., school culture, academic systems, turnaround leadership, and talent development).

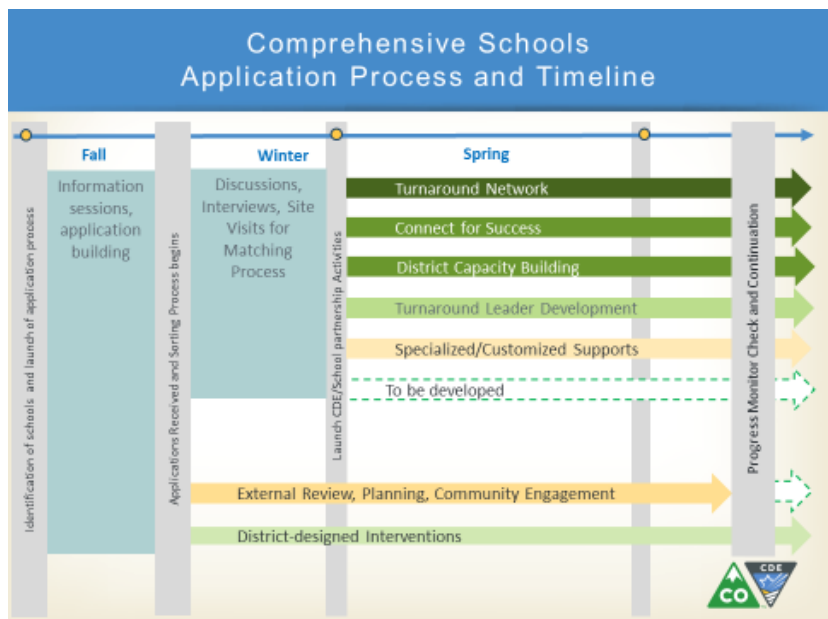
Matched Strategies for Comprehensive Schools. Recognizing that identified schools will be at different levels of readiness and at different levels of desire to engage with the state, a wide range of interventions will be available. A larger portion of the 1003 funds will be earmarked for Comprehensive schools. Funds will be allocated at a sufficient size to ensure impact. Available to all Comprehensive schools, funds will be made available once an agreement is reached on the needs assessment and the selected strategy between the school, LEA, and the state, and documented with the plan. A budget must also be completed.

For sites that demonstrate readiness, the state has developed some intensive and moderate level supports designed specifically for turnaround schools and their districts. Building on promising results, these opportunities incorporate strategies such as professional learning and networking sessions, implementation coaches, site visits to demonstration site schools and highly structured performance management systems. Grants funds will support participation in these programs and site specific implementation needs.

For those sites that are in the exploration phase, grant funds will support in-depth diagnostics, planning and community engagement opportunities.

Figure 2. Comprehensive School Process

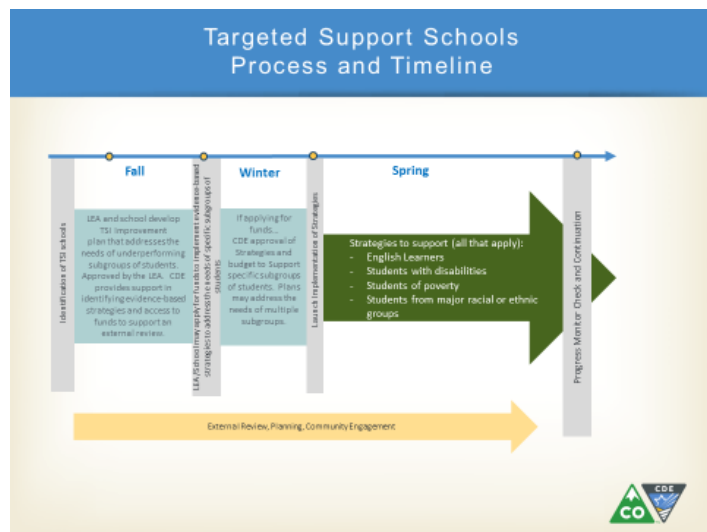
Leadership development opportunities will be available, in recognition that turnaround efforts rely heavily upon strong, effective leadership. Building from an existing state program, several external partners/program have already been pre-vetted. Grant funds will focus on supporting external partnerships, site visits to exemplar schools and coaching.



Some sites may opt for district-directed supports which use locally-developed evidenced based strategies or external partnerships. These applications will need to demonstrate rigor and a likelihood of success to the standards mentioned above. While these sites will engage less with the state, periodic monitoring will occur to ensure adequate progress in implementation.

Figure 3. Targeted School Process

Matched strategies for Targeted Schools. Identified Targeted schools will have access to exploration supports (e.g., external reviews, community engagement, planning) and implementation supports tailored to the specific needs of the population of students that triggered their identification. All LEAs and schools will have access to resources, services and tools. LEAs will approve schools' plans. A portion of 1003 funds will be reserved for TSI schools. Schools that access the available funds will be required need to provide a plan for the use of funds and budget. The supports and funds will be administered using the process depicted in Figure 1 above.



Monitoring and Evaluation of Program. The state will evaluate the school improvement work at both the site level and at the overall state level (see figure1). At the site level, the annual cycle builds site monitoring into the implementation phase, including monitoring and evaluating the use of funds and the impacts of the support structures. The state intends to expand the performance management tools and practices used in many support structures to both assist districts and schools and to inform the impact of programs and funding. This annual cycle also builds in a process to reflect on whether a site is effectively implementing the strategy and seeing desired impact on student performance. This is where the school, LEA and state will determine whether to continue forward with the school's plan or make adjustment to the approach. The state will also evaluate the



overall school improvement structure to ensure equity and effectiveness within the entire system. This will enable the state to act rapidly to adjust or revamp any portions of the process that are not operating effectively.

**B. Technical Assistance Regarding Evidence-Based Interventions. Describe the technical assistance the SEA will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement, including how it will provide technical assistance to LEAs to ensure the effective implementation of evidence-based interventions, consistent with 34 C.F.R. § 200.23(b), and, if applicable, the list of State-approved, evidence-based interventions for use in schools implementing comprehensive or targeted support and improvement plans consistent with § 200.23(c)(2)-(3).**

The state will align and develop existing and new strategies that differentiate support for comprehensive and targeted schools. Assistance will increase in intensity and rigor as schools demonstrate a readiness for change and willingness to engage with external partners (including the state as a technical assistance provider). Technical assistance will build on existing structures and will include: needs analyses and diagnostic opportunities; improvement planning processes; performance management tools and processes; community engagement; differentiated support for each school's unique context; high-quality professional learning and partnership with expert organizations; evidence-based strategies; and cycles of reflection, analysis, and planning. The more-intensive existing state supports include networks and cohorts of schools where the state works closely with school and district leaders to implement very intensive supports. LEAs may also design their own intervention systems that meet evidence based criteria.

The state will assemble a list of evidence-based interventions, strategies, and partnerships that can offer support to the range of needs in identified schools. The listing is intended to be a resource and reference for districts and schools, rather than a required selection list. The list will evolve over time to incorporate the most recent research and will be structured to gather and disseminate user feedback and input on their experience with the selected strategy/partner/intervention.

**C. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i) of the ESEA and 34 C.F.R. § 200.21(f)(3)(iii).**

If the school does not meet exit criteria within three years, the LEA will be expected to pursue more rigorous interventions. This may include establishing management partnerships with external entities; conversion to a charter school; school closure; increased school autonomy through local or state waivers; or other more rigorous improvement strategies. The following will be considered: past and existing supports and grants; outcomes of existing efforts; recommendations by the state's independent State Review Panel; and recommendations of the State Board of Education. State support in planning for these more rigorous interventions will be available.

**D. Periodic Resource Review. Describe how the SEA will periodically review, identify, and, to the extent practicable, address any identified inequities in resources to ensure sufficient support for school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement consistent with the requirements in section 1111(d)(3)(A)(ii) of the ESEA and 34 C.F.R. § 200.23(a).**

The state will establish annual cycles of strategic resource allocation examination and what decision-making process was used in the allocation of funds. Based upon available data (e.g., budget and spending information, supports and resources matched with districts and schools, student performance), the state will analyze the portfolio of supports for Comprehensive and Targeted schools and the effectiveness of those supports. Particular attention will be paid to geographic representation and to districts that have a higher proportion of identified schools. If gaps exist in resources and supports, adjustment will be made to meet those needs.

The Colorado Consolidated Application asks LEAs to describe the process the LEA will implement to approve, monitor and adjust the improvement plans for schools identified for comprehensive or targeted support and improvement to ensure that resources and supports are sufficient to support their low-performing schools.

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