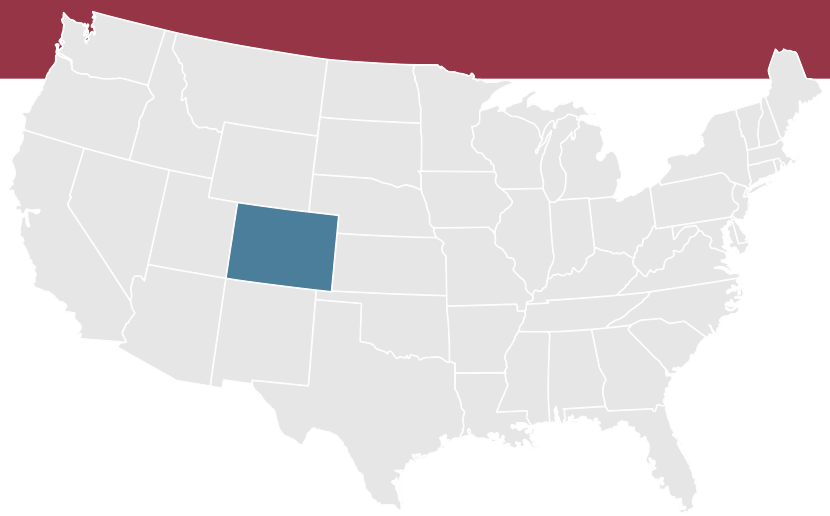# An Independent Review of ESSA State Plans

Colorado

Project Overview

In partnership with the Collaborative for Student Success, Bellwether Education Partners, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state's accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After writing their own reviews independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you'll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of April–June 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website here.

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Overall Strengths and Weaknesses

Strengths: What are the most promising aspects of the state's plan? What parts are worth emulating by other states?

Colorado is considered a national education reform leader. The state has clearly sought out and respected the feedback from many stakeholder groups, and its "hub and spoke" model for conducting outreach is a thoughtful and extensive approach.

In addition, Colorado makes a laudable effort at including more students in its accountability system, by lowering the threshold at which it includes subgroups for accountability and reporting purposes, including additional ways to capture schools with low-performing subgroups, and creating a methodology for including subgroups when they separately do not meet the minimum number of students required. The state also provides a strong rationale regarding its content standards and the process used to validate alignment with higher education. This process should be replicated in other states.

Colorado's plan for supporting schools recognizes that schools will be at varying levels of readiness to engage with the state and establishes a range of interventions in response. The plan should be commended for its focus on leadership as a target of school turnaround efforts.

Weaknesses: What are the most pressing areas for the state to improve in its plan? What aspects should other states avoid?

Colorado is proposing to shift to an entirely normative approach, where all indicators and the accountability system itself are based on relative performance, not a predefined standard. That approach may not be sufficiently clear to parents, educators, or other stakeholders, and it means the accountability system has no incentives aligned to the state's professed goal of college and career readiness for all students. The state also lacks coherent goals for its schools, and the ones provided are disconnected from the state's long-term vision. As a result, the system does not provide schools clear signals about how they need to improve, and it's particularly problematic for those students who have been historically sidelined as a result of their race, class, and/or life circumstances.

Other factors within Colorado's plan warrant additional attention and improvement, particularly Colorado's approach to participation rates. Participation rates are meant to protect a state's most vulnerable students and ensure comparability across all schools, but Colorado's method of excluding students whose parents opted them out of state tests may undermine the state's proposed school-rating methodology. Colorado has also not finalized a number of decisions in its accountability system, leading to uncertainty about how exactly it will be implemented in practice.

Plan Components

Each state's plan has been rated on a scale of 1 ("This practice should be avoided by other states") to 5 ("This could be a potential model for other states").

Goals: Are the state's vision, goals, and interim targets aligned, ambitious, and attainable? Why or why not?

✓ **1**   **2**   **3**   **4**   **5**

Colorado's long-term goals are disconnected from the state's vision. The vision lays out the priorities of all students demonstrating readiness for school, third-grade reading proficiency, meeting or exceeding standards throughout their schooling years, and graduating high school ready for college and careers. However, the state's plan does not set long-term goals for students' early preparation, includes average scale scores rather than a proficiency measure, and does not include any goals for college and career readiness. The enumerated long-term vision is also disconnected from the state's system for classifying school performance.

Colorado has not set clear long-term goals or interim targets to reach its vision. Instead, the state has proposed a confusing percentile-based system that intends to raise the statewide performance from the 50th to the 53rd percentile. The goal to increase the average scale score from the 50th to the 53rd percentile statewide in six years is (1) difficult for parents, educators, and the public to understand; (2) does not set strong expectations for all schools and all groups of students to improve; and, (3) may not be ambitious improvement because the plan does not provide any information about the percentage of students meeting grade-level standards at that performance level. Each of these factors goes against best-practice research on goal setting.

As written, Colorado expects children with disabilities, who currently score at the 1st percentile statewide, to score at the 53rd percentile in six years. That would be an impressive gain, but Colorado also expects Asian students, who currently score at the 82nd percentile statewide, to regress backward to the same 53rd percentile within six years.

In contrast, Colorado has set graduation rate goals using objective data on past performance. The state set a goal of increasing its graduation rate to 90.3 percent within a six-year time frame, based on its analysis of what the state has achieved in recent years. But unlike the percentile approach, which is normative, graduation rate gains are based on actual, observed changes over time against a predefined threshold. The state should apply a similar approach to its achievement goals.

Lastly, Colorado's plan lacks information and specificity about historical English-language proficiency performance, goals, and interim targets.

Standards and Assessments: Is the state's accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

1	2	3	✓ 4	5

Colorado has a high-quality assessment system in grades three through nine through the Colorado Measures of Academic Success, which includes state-developed science and social studies assessments and PARCC English-language arts and math assessments. Colorado also deserves credit for including its assessment in science into its accountability system. This decision may help ameliorate concerns about curriculum narrowing and expand the scope of what schools focus on beyond reading and math.

At the high school level, Colorado is using the PSAT and SAT as its accountability assessment. Absent an independent review, we don't yet know if the PSAT/SAT is fully aligned with Colorado's state academic standards. While offering the SAT as the state's official test offers many benefits, some of those key benefits may not extend fully to all students who require accommodations and may not receive college-reportable scores.

Colorado has provided a detailed description of its accommodations for English language-learners, particularly Spanish-speaking students. However, Colorado could strengthen its plan by ensuring that it has a process in place to meet the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities.

Indicators: Are the state's chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?

1	✓ 2	3	4	5

Although Colorado's proposed list of indicators appears fairly straightforward, the state has not yet determined how each indicator will be weighted in its accountability system. The state does describe how each of the measures that might be used in the accountability system are valid, reliable, and comparable across schools and supported by research.

The state plans to convene its Accountability Work Group in spring 2017 to consider other measures of school quality. While the plan suggests that it will create additional indicators around social emotional learning, school climate, and college and career readiness, the state has not yet finalized its plans in these areas.

ESSA requires states to include proficiency on statewide annual assessments in their accountability system. There are various options to comply with this requirement, but Colorado has proposed an alternative measure, called mean scale scores, that merely reflect schoolwide averages and do not track the percentage of students meeting grade-level standards. This approach appears disconnected from the state's goal of every student meeting or exceeding the standards.

Moreover, Colorado's achievement measure could be undermined by the state's allowance for parent refusals on state assessments. While Colorado mentions that school districts cannot compel families to participate in the state assessment, the state department should have a stronger plan in place to ensure that parental opt-outs do not undermine the school-rating system.

Given the state's expressed long-term priorities, the plan could also be improved through the inclusion of early childhood and postsecondary and workforce readiness indicators. In particular, as the state transitions to the SAT, it may be useful to include the percentage of students meeting the college-readiness benchmark. Further, the state could develop a menu of college- and career-ready predictors (e.g., Advanced Placement, International Baccalaureate, or industry credentials) to help ensure schools are equipping students for success after high school.

Further, the state includes four-, five-, six-, and seven-year graduation rates in its accountability system. While including extended graduation rates is commendable, Colorado could strengthen its plan by placing greater weight on its four-year graduation rate. The state's use of a dropout rate as its indicator of school quality and student success for high schools is also questionable. The dropout rate is a measure of retention, not attainment, and it may send an inaccurate view to parents and the public of the effectiveness of the education system.

Academic Progress: Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

1   ✓ 2   3   4   5

Colorado has been considered a national leader when it comes to assessing academic progress. Its growth model, based on student growth percentiles, has been adopted by a number of other states. The state has also applied its growth model to its English-language proficiency assessment (WiDA ACCESS for English-language learners). However, Colorado has not yet determined how much of an emphasis to place on student progress in its accountability system.

Moreover, Colorado's growth model presents challenges when combined with the state's proposed achievement measure. The state's growth model compares low-performing students with other low-performing students, rather than setting a benchmark that all students should aspire to. Combined with an achievement measure that also ignores the proficiency benchmark, this system may not create a sufficient incentive for Colorado schools to pay attention to raising the performance of low-performing students. Colorado could strengthen its plan by incorporating its "adequate growth percentile" calculation, which does look at a student's progress toward state benchmarks.

All Students: Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

| 1 | 2 | 3 | ✓ 4 | 5 |

While it does not appear that Colorado will be incorporating subgroup scores directly into its school-rating system, it does have a plan to identify 5 percent of each subgroup (e.g., the 5 percent of schools with the lowest-performing subgroup of black students, the 5 percent of schools with the lowest-performing subgroup of students with disabilities, etc.) as schools in need of targeted support. If any particular subgroup continues to flounder for four consecutive years, Colorado will shift those schools into more rigorous, comprehensive support status. The state has not yet provided data behind this approach, but it seems like a reasonable method to target resources to each low-performing subgroups of students.

Colorado should also be commended for its approach to include as many students in accountability calculations as possible. The plan proposes a novel approach that would create a "super-subgroup" only when the individual racial/ethnic subgroups do not meet the state's minimum threshold on their own. The plan provides compelling data behind the state's rationale for using this measure, and limits its use only when necessary. Despite its potential technical complications, this is an idea that could be replicated by other states.

The state also deserves credit for lowering its n-size, the minimum group size used to determine if schools should be held accountable for the performance of subgroups, from 30 to 16 for achievement and graduation indicators and to 20 for growth indicators. Lowering the n-size will ensure more schools are paying attention to more subgroups of students. Colorado also uses three years of aggregated data when a school has too few students in any given subgroup.

Colorado also has a strong plan in place for proposing accountability metrics for its Alternative Education Campuses and for inclusion of extended-year graduation rates to ensure that all students are served, and it could be further improved if the state determined an accountability approach for K-2 schools.

Colorado has done a good job aligning its plan with some of its key work under IDEA. The plan includes and aligns to the IDEA State Systemic Improvement Plan and its IDEA State Personnel Development grant. The plan also contains a strong discussion of how the state will use and incorporate Response to Intervention and Multi-Tiered Systems of Supports in all schools. Finally, it contains a good description of needs of and integration of the Early Childhood workforce, but could strengthen this description by emphasizing the need to specifically screen students for learning disabilities early to ensure educators incorporate interventions beginning in pre-k.

Identifying Schools: Is the state's plan to identify schools for comprehensive and targeted support likely to identify the schools and student groups most in need?

1   ✓ 2   3   4   5

Overall, Colorado's plan lacks clarity in that it does not provide weights for its proposed indicators. Without those proposed weights, it is difficult to determine whether schools will be identified in an advisable manner.

Whenever those weights are finalized, Colorado plans to rank all schools based on the total percentage of points earned. The initial cohort of comprehensive schools will be based on two years of the data and feature Title I schools with the lowest total points earned, to include a minimum of 5 percent of all Title I schools. Subsequent cohorts will be identified with three years of data. Similarly, high schools will be identified for comprehensive support based on three years of graduation data (those with graduation rates below 67 percent).

Colorado uses the same methodology to account for subgroups of students as it does to identify the lowest-performing 5 percent of Title I schools. A school with a subgroup in the lowest 5 percent for that subgroup will be identified for additional targeted support. However, the state's definition of "consistently underperforming" subgroup is cause for concern. Colorado defines a "consistently underperforming" subgroup as one that earns the "lowest rating" on at least three indicators. This is concerning for several reasons. First, no information is provided regarding what level of performance will constitute the "lowest rating." Second, if a school has a subgroup that is not performing well in math and English achievement, that would not be sufficient to identify the school for targeted support because it would need to also earn the lowest rating on a third indicator. Further, it is not clear in the plan the difference in definitions between "consistently underperforming" and "chronically low performing" subgroups.

One area for further clarification is around the process for establishing performance expectations. The plan proposes to set performance bands that are solely normative. It is unclear if those bands stay static or change over time, and over what time period. If they change annually, that artificially "forces" schools to the bottom and the top of the spectrum, which could send inappropriate signals to stakeholders. Further, it could be detrimental to meeting the state's education vision because there would be limited pressure on all schools to improve their performance toward meeting a standard (rather than relative improvements).

As mentioned above, the plan's proposal to exclude students whose parents opted them out of state assessments in accountability determinations could undermine the state's school-rating system. Similarly, the state could strengthen its plan by identifying schools in need of comprehensive support and improvement using the four-year graduation rate, not the extended rate, as the state proposes.

Supporting Schools: Are the state's planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

| 1 | ✓ 2 | 3 | 4 | 5 |

Colorado's support mechanisms for low-performing schools are relatively vague. The state's plan cites a host of possibilities (e.g., performance management tools, professional learning) and describes a resource list, but lacks details. The one area the plan should be commended for is its focus on leadership as a target of school turnaround. Additionally, Colorado does have an "Accountability Clock," embedded in state law, but the plan does not make clear connections between possible interventions and what's statutorily required.

Colorado's plan does provide a description of the tiered system of performance management and technical assistance. The plan lays out an ongoing process for matching 7 percent of its Title I funds dedicated for school-improvement activities using what is called a "needs-based approach." However, the goals outlined by the state appear to be in tension, specifically the intent of "incentivizing innovation" while "providing predictability" to school districts. Given the importance of the former, a competitive allocation process aligned to the state's long-term priorities would likely better serve the state's aspirations.

The state's plan could be improved if the state took advantage of the Direct Student Services opportunity and articulated how it intends to use those resources to provide greater access to advanced coursework for traditionally underperforming subgroups of students.

Exiting Improvement Status: Are the state's criteria for schools to exit comprehensive and targeted support status sufficient to demonstrate sustained improvements? Why or why not?

| 1 | ✓ 2 | 3 | 4 | 5 |

Colorado's plan for exiting low-performing schools is weakened by its poor identification plan and lacks detail. Based on the state's description, schools could exit by jumping in the state's relative rankings without making any actual improvements (other schools could simply fall behind them).

While the state specifies that schools must remain in the Comprehensive Support classification for three years, it provides no information about ongoing performance expectations necessary to exit this list. It is unclear whether/how averaging school performance over three years may make exit more or less challenging for these schools. Further, the plan provides no clear timeline for supporting targeted support and improvement schools. While the state should be commended for its attempt to allow this to be defined by data, lack of upfront clarity will likely lead to confusion among schools and may not encourage the intended improvements.

Continuous Improvement: Has the state outlined a clear plan to learn from its implementation efforts and modify its actions accordingly, including through continued consultation and engagement of key stakeholders? If not, what steps could the state take to do so?

1   2   ✓ 3   4   5

Colorado's plan was developed through significant consultation with stakeholders in and out of the education system. The state also intends to establish annual cycles for evaluating the efficacy of its implementation efforts. However, most of the state's efforts are focused on school- and district-level support, when there's an opportunity in ESSA to directly address student needs. For example, increasing access to career and technical education would align with the state's exploration of a postsecondary and workforce readiness indicator, and be an entirely appropriate use of federal resources. Additionally, the plan could be further strengthened by outlining the steps the state will take to continue to engage with noneducation actors, especially the disability community.