

## ESEA FLEXIBILITY PART B MONITORING REPORT FOR THE COLORADO DEPARTMENT OF EDUCATION

### OVERVIEW OF ESEA FLEXIBILITY MONITORING

The U.S. Department of Education (ED) is committed to supporting State education agencies (SEAs) as they implement ambitious reform agendas through their approved Elementary and Secondary Education (ESEA) flexibility requests. Consistent with this commitment, ED has designed a monitoring process to assess an SEA's implementation of the principles of ESEA and determine the SEA's progress toward ultimately increasing student achievement and improving the quality of instruction for all students.

ED has divided the monitoring into three components:

- Part A, which occurred in fall 2012 through desk monitoring, provided ED with a more in-depth understanding of the SEA's goals and approach to implementing ESEA flexibility and ensured that the SEA had the critical elements of ESEA flexibility in place to begin implementation of its plan in the 2012–2013 school year.
- Part B will take place in the summer and fall of 2013. During this review, ED will take a deeper look at the SEA's implementation of ESEA flexibility across Principles 1, 2, and 3 and any critical unwaived Title I requirements, as well as follow-up on any "next steps" from the SEA's *ESEA Flexibility Part A Monitoring Report*. Part C monitoring will occur beginning in the 2014–2015 school year.

#### *Part B Monitoring*

In Part B monitoring, SEA implementation of ESEA flexibility was reviewed across several key areas: State-level Systems and Processes, Principle 1, Principle 2, Principle 3 and unwaived Title I requirements, as outlined in the *ESEA Flexibility Part B Monitoring Protocol*. In each broad area, ED identified key elements that are required under ESEA flexibility and are likely to lead to increased achievement for students. ED assessed the effectiveness of implementation of ESEA flexibility by identifying the extent to which an SEA:

1. Is ensuring that implementation is occurring consistent with the SEA's approved request and the principles and timelines of ESEA flexibility.
2. Is continuing to review and make adjustments to support implementation.
3. Is sustaining implementation and improvements.

ED monitored the Colorado Department of Education's (CDE's) implementation of its approved ESEA flexibility request on May 29-30, 2013 through an onsite visit. ED's review of CDE included Foundational Reviews of all elements. In addition, ED conducted Comprehensive Reviews of the following elements: Monitoring; Providing Technical Assistance; Data Collection and Use; Family and Community Engagement and Outreach; Developing and Implementing a State-Based System of Differentiated Recognition, Accountability, and Support; Ensuring Implementation of Interventions in Focus Schools; and Ensuring that LEAs Implement Teacher Evaluation and Support Systems.

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The *ESEA Flexibility Part B Monitoring Report* provides information to CDE regarding its progress in implementing the elements of ESEA flexibility identified in the *ESEA Flexibility Part B Monitoring Protocol* and also identifies the status of the CDE's implementation of the unwaived Title I requirements.

The report contains the following sections:

- *Highlights of the SEA's Implementation.* This section identifies key accomplishments in the SEA's implementation of ESEA flexibility.
- *Summary and Analysis of an SEA's Implementation of ESEA Flexibility.* For SEA systems and Processes and each principle of ESEA flexibility, this section describes the level of review (Foundational Review and/or Comprehensive Review) completed and provides a snapshot of the SEA's progress in implementing ESEA flexibility.
- *Elements Requiring Next Steps.* When appropriate, this section identifies any elements where the SEA is not meeting expectations and includes Next Steps that the SEA must take to meet expectations.
- *Status of Unwaived Title I Requirements.* This section identifies whether or not the SEA has met select Title I requirements that have not been waived and, if necessary, indicates any Next Steps that the SEA must take to resolve any unmet requirements.
- *Additional Comments.* This section provides additional information, suggestions, or recommendations that the SEA may want to consider.

ED will continue to work to identify technical assistance needs to assist the SEA in increasing student achievement through ESEA flexibility.

## HIGHLIGHTS OF CDE'S IMPLEMENTATION OF ESEA FLEXIBILITY

Based on information provided during the monitoring interviews and through written documentation, CDE's work implementing ESEA flexibility includes the following key accomplishments:

- One foundational mechanism for driving change in Colorado schools and districts is the Unified Improvement Plan (UIP) that all schools and districts must complete, implement, and revise annually. To help understand development and implementation of the school and district UIPs, and to adjust the support it provides accordingly, the SEA surveys school and district staff annually on the UIP process and how it can be improved.
- Colorado has embarked on the development and implementation of cross-SEA teams (Coordinated Support Teams or CSTs) to better understand the strengths and challenges of its lowest performing schools and districts and maximize support for them. These teams, established at the start of the 2012-2013 school year, include staff from the SEA's Title III and Students with Disabilities offices. Colorado has purposefully matched the skill set of the CSTs to the demographics and needs of the districts to which they are assigned.
- Colorado is in the third phase of a three-phase project to develop sample curriculum units aligned with Colorado Academic Standards (CAS). Phases one and two included teachers across the State developing these units and a rigorous review of them for quality and alignment with standards. These units are currently available on the CDE website. Phase

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three will include cross-grade, cross-content area, and cross-specialty (*e.g.*, teachers of students with disabilities or English Learners) teams in each district in the State developing sample curriculum units. CDE staff will facilitate development of these units, working on-site with district staff.

## SUMMARY AND ANALYSIS OF CDE’S IMPLEMENTATION OF ESEA FLEXIBILITY

SEA Systems and Processes	
Type of Review	<p>The following elements received a Foundational and Comprehensive Review:</p> <ul style="list-style-type: none"> <li>• Monitoring</li> <li>• Technical Assistance</li> <li>• Data Collection and Use</li> <li>• Family &amp; Community Engagement &amp; Outreach</li> </ul>
Summary of Progress and Analysis of Implementation	<p><b><u>Monitoring, Technical Assistance, Data Collection and Use</u></b></p> <p><i>Status</i></p> <p>Based on information that CDE reported and documentation that it provided in support of the on-site visit, it has developed and is implementing systems and processes to monitor, provide technical assistance, and facilitate data collection and use. Through the systems and processes it has established and seeks to continuously refine, CDE aims to conduct these activities at the school, district, and State levels. Thus, CDE seeks to monitor its own processes and how it works with its schools and districts, as well as monitor its schools and districts with respect to implementing reforms across the three principles of ESEA flexibility.</p> <p>CDE’s systems and processes include (1) establishing the CST’s noted above; (2) reviewing, providing feedback on, and approving, for the lowest performing schools and districts in the State, the UIPs required of all schools and districts; (3) surveying schools and districts on activities across the three principles and using survey results to refine its work; (4) conducting focus groups and (5) consistent with its approved request, assigning a <i>Performance Manager</i> to each district rated in the lowest two categories of the SEA’s rating system (<i>Accredited with Priority Improvement Plan</i> or <i>Accredited with Turnaround Plan</i>). CDE’s development and implementation of systems and processes appears farthest along in the elements of ESEA flexibility that constitute principle 2, possibly in part because the State is in its third year of implementing its new accountability system. However, CDE acknowledged that it is working to address challenges in monitoring, technical assistance, and data collection and use that have emerged across reform areas as it moves forward in the transition to college- and career-ready standards and in implementing its new accountability and educator evaluation systems, respectively.</p> <p><u>Principle 1:</u> At the time of the visit CDE’s work in Principle 1 focused on technical assistance to support schools and districts in the transition to Colorado’s college- and</p>

SEA Systems and Processes	
	<p>career-ready standards (the Colorado Achievement Standards or CAS). Specifically, CDE reported and provided evidence to support that it is in the third phase of a three-phase project (described more in-depth below) to provide districts with sample curricula aligned with the CAS. While the State has and continues to elicit feedback on this project (<i>e.g.</i>, the State conducted three two-day symposia across the State in June 2012), its plan extends through December 2013 (August through December) and revolves around working with approximately 70 percent of the LEAs in the State to develop LEA-specific curriculum units. In addition, CDE staff indicated that, throughout the project (which started formally in May 2012), it has surveyed educators around the State regarding the utility of the sample curricula developed to inform on going work on the project. CDE emphasized its State context as one of local control with respect to teaching and learning at the local level. However, given that SB-212 requires all schools and districts to implement the CAS, CDE may consider a more rigorous approach to monitoring, in addition to providing ongoing resources and professional development, as schools and districts fully implement the new standards in the 2013-2014 school year and beyond.</p> <p><u>Principle 2:</u> As noted above, based on the activities CDE described in its approved ESEA flexibility request, information provided on-site, and documentation submitted, Colorado has moved forward with monitoring, providing technical assistance, and promoting data collection and use in the elements of Principle 2. Specifically, Colorado engages in all of these activities around the UIPs that it requires of all schools and districts. Consistent with its theory of action that lower-performing schools and districts require more monitoring and support, CDE engages more directly in these activities with the schools and districts in the two lowest performance levels according to CDE’s performance rating system (a system that categorizes schools and districts into four performance levels). Specifically, CDE iteratively reviews the UIPs of its lowest performing schools and districts in cross-agency teams and <i>Performance Managers</i> work with them on an ongoing basis to facilitate implementation of their UIPs. The lowest-performing schools and districts may submit their UIPs in October each year for early feedback, must submit them in January for feedback, and must submit revised and completed UIPs by April for posting on the CDE website. To support the development and implementation of high- quality UIPs for all schools and districts, CDE publishes a variety of resources on its website including, for example, its <i>Unified Improvement Planning Handbook</i>, <i>District Accountability Handbook</i>, and <i>Supplement to the CDE District Accountability Handbook</i>. CDE updated all documents in September 2012 based on feedback it received from its UIP Needs Assessment survey and internal discussions on ways to refine the UIP template and process.</p> <p><u>Principle 3:</u> As with the reforms across principles, CDE has a legislative foundation</p>

SEA Systems and Processes	
	<p>for the work in Principle 3 that requires all districts to implement new teacher and principal evaluation and support systems consistent with the requirements articulated in the legislation. The legislation requires full implementation of the systems in the 2013–2014 school year and CDE continuously updates its website with resources that it has developed for both districts implementing the State model and for districts opting to develop and implement their own systems consistent with the legislation (these resources are described more in-depth below). To date, the State has not formally monitored development of the models to be implemented in 2013–2014. However, the aforementioned legislation requires each district to submit an assurance that will implement its new teacher and principal evaluation systems in 2013–2014, whether it will implement the State-developed or its own model, and, if the latter, a description of the model. Consistent with the legislation, CDE reported that it will post all locally-developed models. As one way to ensure that locally developed models comply with State legislation, the State reported that it will study results both alone and in comparison with the State-developed model.</p> <p><u>Looking at Impact/Continuous Improvement</u>        Colorado reported and provided evidence to support that its primary approach to considering the impact of its own systems and processes is through surveying educators across the State (e.g., the 2013 UIP Needs Assessment survey). In addition, as time and resources allow, the State elicits feedback in person (e.g., via the June 2012 symposia noted above) to inform its work and make adjustments accordingly. CDE demonstrated use of such data via updated resources and tools for major activities across reform areas (e.g., in September 2012, CDE revised and supplemented the guidance it provides to schools and districts regarding development of UIPs in response to the 2012 UIP Needs Assessment Survey results). Further CDE considers school- and district-level student performance data internally and subsequently reviews these data with schools and districts to inform monitoring and technical assistance and to facilitate its own and district and school use of data. For example, CDE provided documentation that shows the data that CDE staff considered internally prior to working in person with district staff.</p> <p><u>Monitoring Supplementary Information</u>        CDE reported and provided evidence to support that it continues to monitor compliance with Title I and the Individuals with Disabilities in Education Act (IDEA) requirements.</p> <p><u>Data Collection and Use Supplementary Information</u>        CDE reported and provided evidence to support that it has embarked on various routines for facilitating data use at the local level, including conducting “data dives” for both internal use and use with districts. CDE also reported and provided documentation on a new “data dashboard” that it will have available to provide to</p>

<b>SEA Systems and Processes</b>	
	<p>districts in June 2013. This tool will include data on a variety of indicators including student performance and spending trends as well as the ability to compare these data with other districts. CDE is in the process of analyzing all data it collects from districts to understand what data elements remain necessary and what may be eliminated. This analysis started externally and then CDE determined to complete it internally. In addition, CDE is transitioning from the <i>Automated Data Exchange</i> to a new data system.</p> <p><b><u>Family &amp; Community Engagement &amp; Outreach</u></b></p> <p><i>Status</i></p> <p>CDE reported and provided evidence to support that it has a variety of mechanisms to implement in family and community engagement and outreach: the State Advisory Council for Parent Involvement in Education (SACPIE), the newly established Families, Educators, and Community Resources (FEER) Community of Practice (established in August 2012), and the SB-163 Task Force (a task force charged with providing recommendations on the implementation of and revision to the SEA’s new accountability system). Colorado legislation requires all of these mechanisms to be in place. CDE reported and provided evidence to demonstrate that these legislatively required groups meet regularly. Specifically, these groups met or will meet on the following dates. All information about these meetings, including minutes and attendees, is posted and readily accessible on the CDE website.</p> <ul style="list-style-type: none"> <li>• SACPIE—February 19, 2013; May 21, 2013; and August 18, 2013; a list of members can be found here:  <a href="http://www.cde.state.co.us/SACPIE/about_membership.asp">http://www.cde.state.co.us/SACPIE/about_membership.asp</a>;</li> <li>• FEER Community of Practice—August 23, 2012, September 21, 2012; and online monthly;</li> <li>• SB-163 Task Force—November 6, 2012; December 17, 2012; January 22, 2013; March 18, 2013; and April 29, 2013; members include, for example, staff representing programs across CDE, local district staff, and institutions of higher education staff.</li> </ul> <p>In addition, schools and districts are required to establish school and district accountability committees (SACs and DACs, respectively) in order to, among other tasks, contribute to the development of school and district UIPs. On May 28, 2013, Colorado passed legislation strengthening the roles and responsibilities of the SACs and DACs.</p>

Principle 1	College- and Career-Ready Expectations for all Students
<p><b>Type of Review</b></p>	<p>The following elements received a Foundational Review:</p> <ul style="list-style-type: none"> <li>• Transition to and Implement College- and Career- ready Standards</li> <li>• Adopt English Language Proficiency (ELP) Standards that Correspond to College- and Career-ready standards</li> <li>• Develop and Administer High-Quality Assessments Aligned With College- and Career-ready Standards</li> <li>• Develop and Administer Alternate Assessments Consistent With 34 C.F.R § 200.6(a)(2)</li> <li>• Develop and Administer ELP Assessments Aligned With the State’s ELP Standards, Consistent With the Requirements in ESEA §§ 111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii)</li> <li>• Annually Reports to the Public College-going and College-Credit Accumulation Rates, as Defined under State Fiscal Stabilization Fund Indicators (c)(11) and (c)(12)</li> </ul>
<p><b>Summary of Progress and Analysis of Implementation</b></p>	<p><b>Transition to and Implementation of College- and Career- Ready Standards</b>  <i>Status</i></p> <p>Colorado reported and provided evidence to demonstrate how it is transitioning to and will fully implement the CAS in the 2013–2014 school year. Consistent with its approved request for ESEA flexibility, Colorado’s transition activities include development and dissemination of a transition toolkit for districts, development and dissemination of sample curricula, formative assessment resources (via the previously mentioned Content Collaboratives), and a host of additional transition resources available on its website at:  <a href="http://www.cde.state.co.us/standardsandinstruction/index.asp">http://www.cde.state.co.us/standardsandinstruction/index.asp</a></p> <p>On May 12, 2012, CDE hosted a half day summit on the transition to the CAS. During the summit, CDE provided an overview of the resources available at that time and a preview of forthcoming resources. Since that time, CDE reported and provided evidence to support that it has completed significant work on what it came to call the <i>Colorado District Sample Curriculum Project</i> (i.e., the sample curricula noted above). The project includes development, vetting, and dissemination of sample curriculum units covering grades K-12 and all content areas (both core content areas and others). Teams of teachers developed the initial set of sample curricula units now available on the CDE website. While the teams that developed each of the first sample units did not necessarily include representation of, teachers that teach students with disabilities or English Learners, the ones to be developed moving forward in the third and final phase of the project will. In this phase, CDE staff will work onsite with at least 70 percent of districts across the State (this will include the lowest performing districts) to develop district-specific sample curricula. The third phase is scheduled to be completed by December 2013.</p> <p>It should be noted that staff from the Exceptional Student Services Unit, the unit that houses the Office of Special Education, reported on and provided evidence to support that they have collaborated with CDE staff overseeing the <i>Colorado District</i></p>

Principle 1	College- and Career-Ready Expectations for all Students
	<p><i>Sample Curriculum Project</i> to develop and implement a project that will result in the modification or supplementation, as necessary, of the first sample curriculum units developed to support specifically special education and general education teachers who teach students with disabilities to ensure that these students have access to the CAS. CDE also reported on and provided documentation to support an emphasis in one component of the sample curriculum unit template that reflects the CDE’s instructional paradigm shift related ensuring that English Learners have access to the CAS.</p> <p>Subsequent to the monitoring visit, CDE reported that in June, 2013, it hired a liaison to build capacity across the State’s teacher preparation programs to strengthen prospective teachers' understanding of the new standards and accountability measures.</p> <p><b>Adopt English Language Proficiency Standards That Correspond to College- and Career-ready Standards</b>  <i>Status</i>            CDE reported and provided evidence to show that it has adopted the World-Class Instructional Design and Assessment (WIDA) standards; the WIDA website confirms that Colorado has adopted the WIDA English Language Proficiency Standards.</p> <p><b>Develop and Administer High-Quality Assessments Aligned With College- and Career-ready Standards</b>  <i>Status</i>            Colorado reported that it has determined to implement the Partnership for Assessment of Readiness in College and Careers (PARCC) Race to the Top Assessment Consortia assessments. To prepare for online assessment administration, the SEA is implementing science and social science assessments on-line in the 2013–2014 school year. In addition, the CDE reported that it began administering the PARCC readiness survey in November 2012 (the survey is ongoing) to help PARCC understand the type of support necessary to successfully implement its assessments in the 2014–2015 school year. Consistent with its approved request, the State has formed Content Collaboratives whose work focuses on helping schools and districts evaluate locally administered assessments for, among other criteria, rigor with respect to alignment with the CAS.</p> <p><b>Develop and Administer Alternate Assessments Consistent With 34 C.F.R § 200.6(a)(2)</b>  <i>Status</i>            CDE is in the process of determining which of the two ED-funded General Supervision Enhancement Grants (GSEG) assessments it will administer to fulfill this ESEA flexibility assurance (either the Dynamic Learning Maps or National Center and State Collaborative Assessment assessments). CDE indicated that it will make this decision in fall 2013.</p> <p><b>Develop and Administer ELP Assessments Aligned with the State’s ELP</b></p>

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Principle 1	College- and Career-Ready Expectations for all Students
	<p><b>Standards, consistent with the requirements in ESEA §§ 111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii)</b></p> <p><i>Status</i> CDE began administering the WIDA-developed Assessing Comprehension and Communication in English State-to-State for English Language Learners (ACCESS for ELLs) in 2012–2013 to fulfill this ESEA flexibility assurance.</p> <p><b>Annually Reports to the Public College-going and College-credit Accumulation Rates, as defined under State Fiscal Stabilization Fund Indicators (c)(11) and (c)(12)</b></p> <p><i>Status</i> CDE reported that it has been reporting in-State college-going data since 2011 and anticipates being able to add out-of-State college-going data by December 2013. CDE reported that it will be able to report college-credit-accumulation for both in- and out-of-State institutions beginning with 2012–2013 data.</p>

<b>Principle 2</b>	<b>State-Developed Differentiated Recognition, Accountability and Support</b>
<b>Type of Review</b>	<p>The following elements received a Foundational Review:</p> <ul style="list-style-type: none"> <li>• Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support</li> <li>• Reward Schools</li> <li>• Priority Schools</li> <li>• Focus Schools</li> <li>• Other Title I Schools</li> <li>• State and Local Report Cards</li> </ul> <p>In addition, the following element(s) received a Comprehensive Review:</p> <ul style="list-style-type: none"> <li>• Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support</li> <li>• Focus Schools</li> </ul>
<b>Summary of Progress and Analysis of Implementation</b>	<p><b>Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support</b></p> <p><u>Status</u>        CDE’s differentiated recognition, accountability, and support system, used for both federal and State purposes under ESEA flexibility, has been in place since school year 2010–2011. The CDE reported and provided documentation to show that the system continues to be on track with respect to providing schools and districts with one of four ratings (<i>performance, improvement, priority improvement, and turnaround</i>) and requiring all schools and districts to develop and implement UIPs that identify “performance challenges,” establish targets and interim benchmarks for improvement, and describe interventions based on performance of the individual indicators that contribute to a school or district rating. As a way to differentiate the UIPs with respect to the actions required of schools and districts achieving at different levels in Colorado’s accountability system, CDE prepopulates school and district UIPs with their particular statuses on different programs (<i>e.g., focus school status</i>). These designations trigger what a school or district must attend to in completing its UIP.</p> <p><b>Reward Schools</b></p> <p><u>Status</u>        CDE has identified its 2012–2013 Reward schools (based on 2011–2012 assessment data) and, as of the monitoring visit, was in the process of completing notification letters to these schools. The CDE had previously identified one highest-performing and one highest-progressing school, respectively, for the 2011–2012 school year (based on 2010–2011 assessment data), and posted the names of these schools on its website for public recognition. It should be noted that CDE has long-established programs that identify and reward schools based on performance (<i>e.g., Title I Distinguished Schools, Centers for Excellence Schools, Governor’s Distinguished Improvement Schools, etc.</i>); however, the criteria for these schools does not align with the criteria for Reward schools under ESEA</p>

<b>Principle 2</b>	<b>State-Developed Differentiated Recognition, Accountability and Support</b>
	<p>flexibility. The State indicated that it was delayed in naming Reward schools for the 2012–2013 school year but intends to “get on a better track” next year.</p> <p><b>Priority Schools</b> <i>Status</i> Consistent with its approved request for ESEA flexibility, all Priority schools in Colorado are Tier I or Tier II School Improvement Grant (SIG) schools. Colorado awarded its fourth cohort of SIG schools on June 19, 2013, to bring its number of SIG schools to the number required under ESEA flexibility. Cohort IV schools will begin implementing one of the four SIG models in the 2013–2014 school year. As part of the approval process, SIG-awarded schools in Colorado must update their UIPs to reflect the selected SIG model on their current UIP. The Office of School Turnaround in the Office of Elementary and Secondary Education at ED monitored Colorado’s SIG program in September, 2012. The monitoring report from that visit can be found here: <a href="http://www2.ed.gov/programs/sif/monitoring/index.html">http://www2.ed.gov/programs/sif/monitoring/index.html</a>.</p> <p><b>Focus Schools</b> <i>Status</i> Colorado reported and provided evidence to support that, in September 2012, CDE assigned CDE staff to act as “focus school liaisons” to its focus schools across the State. To the extent possible, CDE matched the skill set of the focus school liaisons to the reasons for which the school was identified as a focus school (<i>e.g.</i>, assigning a person from the State’s Title III office to schools identified due to low performance of English Learners). CDE reported and provided evidence to support that it notified its focus schools in September and October 2012 of their statuses as focus schools via a phone call and letters sent through the U.S. mail (despite not posting this list on its website until March 2013) to district superintendents. The letter indicated the reason that led to each school’s identification as a focus school, provided a link on the CDE website for resources on the specific information that focus schools needed to include in their UIPs (<i>i.e.</i>, the UIP “quality criteria” for focus schools), and indicated that additional information and resources would be forthcoming. In October 2012, CDE focus school liaisons met internally to review the data from their focus schools. On November 14 and 15, 2012, CDE staff (including some of the assigned focus school liaisons) provided webinars to focus schools on expectations and supports for focus schools. On December 4, 2012, CDE staff provided a webinar to provide resources for focus schools to target the needs of English Learners. In January 2013, CDE trained staff internally for the review of focus school UIPs and provided an informational webinar to focus schools on UIP development and revision. CDE provided documentation to corroborate the reports of all activities listed above.</p>

Principle 2	<b>State-Developed Differentiated Recognition, Accountability and Support</b>
	<p>While focus schools began to address the needs of the students that led to their identification as focus schools in the first semester of the 2012–2013 school year, they were still implementing the UIPs that they had developed prior to being identified as such. However, they were beginning the UIPs that would then more directly address the reasons for which they were identified as focus schools. From November 2012 through the first submission to CDE of the UIPs in January 2013, focus school liaisons worked iteratively with focus schools to develop UIPs that would address the needs of the students that led to the school’s identification and other UIP quality criteria (the basis on which UIPs are evaluated and approved). Focus school liaisons then continued to work with focus schools to revise their UIPs as necessary for approval in April 2013. CDE provided documentation from a sample of focus schools that included the feedback they received and their revised UIPs. This process of UIP approval is consistent with Colorado’s approved request for ESEA flexibility.</p> <p>In addition, consistent with CDE’s approved request for ESEA flexibility, information that CDE reported, and evidence that it provided, (1) all focus schools implemented choice and supplementation educational services, and (2) CDE awarded 1003(a) funds on a competitive basis to its focus schools. In support of its plan to award 1003(a) funds to focus schools, CDE included in its documentation a webinar that it provided to its focus schools on February 13, 2013. Further, it reported during the onsite visit and confirmed via email subsequent to the visit that, to date, it has awarded 1003(a) funds to 28 of 66 focus schools and anticipates awarding funding to approximately 20 additional focus schools in a competition for which proposals are due July 10, 2013. CDE provided non-funded focus schools information on the weaknesses in their submissions to facilitate stronger submissions for the applications due on July 10, 2013.</p> <p>CDE has established a cross-department focus school task forces that it plans to convene in early summer 2013 to strengthen the support that it provides to its focus schools in the 2013–2014 school year.</p> <p><b>Other Title I Schools</b>  <u>Status</u>      As noted previously, school and district performance framework ratings and the UIPs that all schools and districts must complete based on those ratings, constitute the core of CDE’s accountability system. All UIPs include identified “performance challenges,” targets and interim benchmarks for improvement, and interventions based on performance of the individual indicators that contribute to a school or district rating. Schools and districts use student performance, overall and by subgroups, against performance targets (including graduation rates) to identify “performance challenges” and then must describe how they will address these challenges. CDE reported and provided evidence that it has established, published on its website, and presented on during a fall 2012</p>

Principle 2	State-Developed Differentiated Recognition, Accountability and Support
	<p>voluntary webinar a variety of resources for completing the UIP. These resources include a calendar on which CDE provides schools and district ratings and the process and timeline on which schools and districts must submit UIPs to CDE for review, approval, and posting.</p> <p><b>State and Local Report Cards</b></p> <p><u>Status</u></p> <p>Colorado reported that it is currently finalizing its State and local report cards based on 2011–2012 assessment results. The CDE reported that it waited for ED’s February 2013 revised report card non-regulatory guidance in order to revise its State and local report cards. CDE staff indicated that it anticipates these report cards being published on or before August 2013. The CDE further indicated that it hopes to move forward with publishing report cards on a faster timeline.</p>

Principle 3	Supporting Effective Instruction and Leadership
<p>Type of Review</p>	<p>The following elements received a Foundational Review:</p> <ul style="list-style-type: none"> <li>• Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems</li> <li>• Ensure LEAs Implement Teacher Evaluation and Support Systems</li> <li>• Ensure LEAs Implement Principal Evaluation and Support Systems</li> </ul> <p>In addition, the following element received a Comprehensive Review:</p> <ul style="list-style-type: none"> <li>• Ensure LEAs Implement Teacher Evaluation and Support Systems</li> </ul>
<p>Summary of Progress and Analysis of Implementation</p>	<p><b>Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems</b>  <i>Status</i>        CDE has not changed the teacher and principal evaluation and support system guidelines that its State Board of Education developed in response to SB-191 and adopted on November 9, 2011.</p> <p><b>Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems</b>  <i>Status</i>        Per Colorado legislation SB-191, all districts in the State must fully implement new teacher and principal evaluation and support systems in the 2013–2014 school year. To support districts in this work, Colorado reported and provided evidence to demonstrate that it has implemented activities consistent with both SB-191 and its approved request, including the following:</p> <ul style="list-style-type: none"> <li>• Developing a State model (districts can implement this or develop their own models.);</li> <li>• Providing guidance and resources to districts (CDE posted on its website a variety of resources including, for example, updated <i>User’s Guides</i> for both the teacher and principal evaluation and support systems, updated State-model rubrics for evaluating both teachers and principals, and resources for implementing the required 50 percent of student growth that contributes to a teacher and principal evaluation rating.);</li> <li>• Providing training for at least 163 districts across the State in summer 2012; and</li> <li>• Piloting the systems (CDE piloted the principal evaluation system in both 2011–2012 and 2012–2013 and the teacher evaluation system in 2012–2013.).</li> </ul> <p>Further, CDE reported and provided evidence to support that it (1) plans additional training on the evaluation systems in summer 2013 (five additional trainings around the State from June through August 2013); and (2) plans to continue analysis on its teacher and principal evaluation systems pilots through summer 2015.</p>

**ELEMENTS REQUIRING NEXT STEPS**

<b>Principle 3</b>	<b>Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems</b>
<b>Summary and Status of Implementation</b>	As noted above, Colorado districts may either implement the State model teacher and principal evaluation and support systems or develop and implement their own systems consistent with the requirements specified in SB-191. While SB-191 requires that 50 percent of a teacher and principal evaluation rating must be based on student growth, it does not indicate that the statewide assessments must be a significant factor for teachers of grades and subjects for which such assessments exist, and for all principals, only that they must be a factor.
<b>Next Steps</b>	<p>CDE must use the analysis* that SB-191 requires it to conduct beginning in July 2014 to (1) determine how it will include student growth from the Statewide assessments as a significant factor in the State model teacher and principal evaluation and support systems; and (2) commit to working with ED to incorporate the findings of its analysis either in its final guidelines or revise its final guidelines as necessary. Districts will then be prepared to use growth from Statewide assessments as a significant factor in their teacher and principal evaluation and support systems beginning in 2014–2015.</p> <p>*SB-191 requires CDE to conduct an analysis of the correlation between results for individual educators on measures of student academic growth, including the statewide assessment, and the professional practice measures.</p>

**Recommendations**

- (1) Monitoring, Technical Assistance, Data Collection and Use and Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (Other Title I Schools)

Continue to build capacity of CDE CSTs to help ensure development and implementation of high quality UIPs for all schools and districts to address the needs of students that miss performance targets even though the school or district may perform well overall.

Increase the rigor of monitoring for select elements (*e.g.*, implementation of CAS, UIPs of higher performing schools and districts, etc.).

- (2) Use and Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (Focus Schools)

Continue to coordinate across units and offices within CDE to build capacity of staff to support the work in focus schools to implement interventions intended to close achievement gaps.

SEA: Colorado Department of Education  
 Request Submitted: November 14, 2011  
 Request Approved: February 9, 2012

ESEA Flexibility Monitoring, Part B  
 Monitoring Review: May 29-30, 2013  
 Exit Conference: June 20, 2013

**NOTE:** As part of the CDE pilot of ESEA flexibility Part B monitoring, ED conducted an expedited review of the unwaived the Title I requirements listed in the tables below. ED carefully reviewed the documentation CDE provided in response to the monitoring protocol and asked some clarifying questions on-site as well. Based on the documentation that CDE submitted, ED found next steps necessary in one requirement—Services to Eligible Private School Children. The required next steps are listed in the relevant table below.

### STATUS OF UNWAIVED TITLE I REQUIREMENTS

<b>Requirement</b>	<b>Fiscal Integrity (§9304 of the ESEA; 2.G of ESEA Flexibility)</b>
<b>Status</b>	The SEA has demonstrated that it has met the fiscal integrity requirements.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Within State Allocations, Reallocations, and Carryover (§§200.70 – 200.75 of the ESEA’s regulations; §§1126(c) and 1127 of the ESEA)</b>
<b>Status</b>	The SEA has demonstrated that it has met the within State allocations, reallocations, and carryover requirements.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Within District Allocation Procedures (§§ 1113, 1116, 1118 of the ESEA and §200.77 and 200.78 of the ESEA’s regulations)</b>
<b>Status</b>	The SEA has demonstrated that it has met requirements for within district allocation procedures.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Fiscal Requirements: Maintenance of Effort, Comparability, Supplement Not Supplant, and Internal Controls (§§1114, 1120A, 1115, and 9521 of the ESEA)</b>
<b>Status</b>	The SEA has demonstrated that it has met the requirements related to maintenance of effort, comparability, supplement not supplant, and internal controls.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Services to Eligible Private School Children (§1120 and 9306 of the ESEA; §443 of GEPA; and §§200.62-200.67, §200.77 and §200.78 of the ESEA’s Regulations)</b>
<b>Status</b>	Based on the documentation provided, ED found that CDE does not adequately indicate in its guidance that: (1) a person filing a complaint regarding provision of services to private school students can request a review of and determination on the final decision by the Secretary, and (2) LEAs must, free of charge, disseminate adequate information to private school officials, parents, etc. of the availability of services to eligible private school children.
<b>Next Steps</b>	CDE must amend or supplement its current guidance regarding services to eligible private school children on or before August 31, 2013.

SEA: Colorado Department of Education  
Request Submitted: November 14, 2011  
Request Approved: February 9, 2012

ESEA Flexibility Monitoring, Part B  
Monitoring Review: May 29-30, 2013  
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<b>Requirement</b>	<b>Test Security</b>
<b>Status</b>	The SEA has demonstrated that it has met the test security requirements.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Schoolwide Planning (Priority, Focus, and Other Title I Schools) (§1114 of the ESEA)</b>
<b>Status</b>	The SEA has demonstrated that it has met the schoolwide planning requirements.
<b>Next Steps</b>	None.

<b>Requirement</b>	<b>Targeted Assistance Schools (§1115 of the ESEA)</b>
<b>Status</b>	The SEA has demonstrated that it has met the requirements for targeted assistance schools.
<b>Next Steps</b>	None.