Colorado

ESEA FLEXIBILITY REQUEST

Re-submitted by the Colorado Department of Education November 28, 2012.

This document replaces the previous version submitted January 20, 2012.

U.S. Department of Education
Washington, DC 20202
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## Cover Sheet for ESEA Flexibility Request

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<tr>
<td>Robert Hammond</td>
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<th>Chief State School Officer (Printed Name):</th>
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**Signature of the Chief State School Officer:**  

[Signature]

**Date:** 11-28-2012

The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.
By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State’s proficient level of academic achievement on the State’s assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.

2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.

3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.

4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.

5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools.
7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools.

8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.

9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.

10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State’s priority schools.

11. The requirements of ESEA section 3122(a) that prescribe how CDE must establish annual measurable achievement objectives tied to English language proficiency, English language attainment, and content proficiency among English language learners. CDE requests this waiver so that it may develop its own ambitious but achievable goals for English language attainments and ELL content proficiency.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

- The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.
ASSURANCES

By submitting this application, the SEA assures that:

1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.

2. It will adopt English language proficiency (ELP) standards that correspond to the State’s college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State’s college- and career-ready standards. (Principle 1)

4. It will develop and administer ELP assessments aligned with the State’s ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA’s differentiated recognition, accountability, and support system. (Principle 2)

7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)

8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later than the deadline required under the State Fiscal Stabilization Fund. (Principle 3)

9. It will evaluate and, based on that evaluation, revise its own administrative requirements to
reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

☒ 10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.

☒ 11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).

☒ 12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (e.g., by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).

☒ 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

If the SEA selects Option A or B in section 3.A of its request, indicating that it has not yet developed and adopted all guidelines for teacher and principal evaluation and support systems, it must also assure that:

☐ 14. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)
Consultation

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

Notices inviting public comment, public and stakeholder group comments received, and letters of support can be found in Attachments 2 and 3.

Colorado recognizes that stakeholder engagement is critical to the effective implementation of the state’s education initiatives and, ultimately, to moving the state to college and career readiness for all students. This is why our ESEA waiver request builds upon existing Colorado reform efforts in standards and assessments, recognition, accountability and support, and educator effectiveness, each of which has been shaped extensively by the input of our stakeholders. We have continued to seek stakeholder input as we develop our waiver request, and, as we value a system of continuous improvement, are firmly committed to ensuring that stakeholder input remains central in our implementation efforts.

The foundation of Colorado’s system has been built through three key pieces of legislation: SB-212 (Colorado’s Achievement Plan for Kids, standards and assessments), SB-163 (Education Accountability Act, school and district accountability), and SB-191 (Great Teachers and Leaders, educator evaluation). In each case, the legislative and rule-making process has included extensive public and stakeholder input. This process is summarized below, with details provided in each relevant section of this request.

Principle I: College- and Career-Ready Expectations for all Students

CAP4K: Defining Postsecondary and Workforce Readiness

The Colorado Department of Education (CDE) and the Colorado Department of Higher Education (DHE) worked together to develop a “postsecondary and workforce readiness” (PWR) description that includes the knowledge, skills and behaviors essential for high school graduates to be prepared to enter college and the workforce and to compete in the global economy.

To accomplish this, the two departments jointly convened 13 regional meetings around the state between November 2008 and June 2009. The purpose of these meetings was to engage local communities in conversations about the skills and competencies students need to succeed after high school. To this end, we engaged over 1,000 P-12, higher education, community college, business,
parents, board members and other local stakeholders. Feedback captured at each regional meeting can be accessed at: http://www.cde.state.co.us/cdegen/SB212.htm.

Additionally, CDE partnered with Colorado Succeeds and a number of prominent business and community college leaders in online surveys targeted toward the specific needs and interests of these groups. A report of survey findings can be accessed at: http://www.cde.state.co.us/cdedocs/ASMTRev/LegislativeReport_2011_finalWattachments.pdf.

Based on local input, CDE and DHE jointly drafted a PWR description for review and feedback by the State Board of Education and Colorado Commission on Higher Education. Members of the public were invited to provide comment at the State Board meeting on June 10, 2009 (http://www.cde.state.co.us/communications/download/PDF/20090605postsecondaryreadiness.pdf). The final PWR definition was adopted by the State Board of Education and Colorado Commission on Higher Education for joint adoption at a meeting on June 30, 2009.

CAP4K: CDE/CEA Teacher Tour
In collaboration with the Colorado Education Association (CEA), CDE conducted a 13-stop tour across the state to identify teacher understanding of CAP4K, its relevance to practice, its impact on teaching and learning and the kind of help that teachers would find useful for classroom implementation. Following this tour, CDE and CEA released a report that captures findings from all 13 stops, titled "CAP4K Teacher Tour, Aligning State-Level Support with Classroom-Level Needs." The report highlights discussion, particularly the conclusion that teachers want to be involved in education reform, regional themes, and next steps, and contains meeting notes for each of the 13 locations. Feedback from the tour has been used to help CDE organize professional development and other support for teachers related to CAP4K. Specifically, it has guided and informed revised standards rollout and implementation, revised assessment design, the CAP4K cost study, design and implementation of a statewide system of accountability and support and Colorado’s Race to the Top proposal.

Revisions from the Colorado Model Content Standards to the Colorado Academic Standards
In 2009, CDE initiated a year-long process of revising academic standards in all ten content areas (the arts, comprehensive health and physical education, mathematics, reading and writing, science, social studies, and world languages) and English language proficiency. Following this year-long standards revision process, the Colorado State Board of Education adopted the Colorado Academic Standards (CAS) in December 2009, creating Colorado’s first fully aligned preschool-through-high school academic expectations. The standards were developed by a broad spectrum of Coloradans representing Pre-K and K-12, higher education, English learners, students with disabilities, and business, and utilized the best national and international exemplars. Seven hundred and eighty-six people applied to fill 255 unpaid roles on content subcommittees. Selection was made by Colorado stakeholders in a name-blind process using the merits of both the application and resumes. National experts also provided advice and continuity editing, structural technique and research feedback on the drafts and public recommendations. Official public hearings also followed at each relevant State Board of Education
In the transition to new standards, Colorado’s has carefully planned a multi-year transition process that includes four phases: (1) awareness (school year 2010-11); (2) transition (school years 2011-13); (3) full implementation (school year 2013-14); and (4) transformation - an ongoing process of continuous improvement in teaching and learning. Awareness involves communication about the CAS; transition involves planning for required changes; implementation involves instituting the necessary changes; and transformation represents the intended outcome of implementing college- and career-ready standards. For a detailed description of how Colorado continues to engage stakeholders in each of these phases, please see Principle I of this request.

Revisions to the Colorado State Assessment

A stakeholder advisory group was assembled to help frame the issues of the current state assessment system, recommend improvements, and define the work of subcommittee groups. There were 35 members with representatives from each key professional sector: business, higher education, military, K-12 educators, school district administration, early childhood education, special education, English language learner specialists, and local school board members. From October 2009 through 2010, the stakeholders met 13 times in day-long meetings. The committee advised the process, gave expert opinion on assessment attributes, selected subcommittee members and reached consensus on final recommended attributes. For more information about the Assessment Stakeholder Committee, please go to: [http://www.cde.state.co.us/ASMTRev/stakeholders.htm](http://www.cde.state.co.us/ASMTRev/stakeholders.htm).

To assist in the work of the Stakeholder Committee, it has created the following subcommittees:

1. School Readiness and Early Childhood Assessments
2. Postsecondary and Workforce Readiness Assessments
3. Summative Assessments
4. Formative Instruction and Interim Assessments
5. Assessments for Special Populations

For more information about the subcommittees, please go to: [http://www.cde.state.co.us/ASMTRev/Subcommittees.htm](http://www.cde.state.co.us/ASMTRev/Subcommittees.htm).

For a detailed description of how Colorado continues to engage stakeholders in the state’s assessment revisions, please see Principle I of this request.

**Principle II: State-Developed Differentiated Recognition, Accountability and Support**

Colorado education leadership and stakeholders have long embraced accountability. As early as 1998, the Colorado Accreditation Act (HB-127) required CDE to accredit districts by contract based on compliance with accreditation indicators, and in 1999, Senate Bill 186 established School Accountability...
Reports (SARs) for all public schools, rating schools based on CSAP status measures. School and district educators, however, recognized the limitations of these narrow evaluations. In 2001, a district consortium established a longitudinal growth pilot project, and in 2003, Colorado’s Association of School Executives (CASE) and the Donnell-Kay Foundation, a private education foundation, published the results of the Colorado Accountability Project. The Colorado Accountability Project report reflects the efforts of a task force of more than 45 education, business and community leaders from across the state, who worked together to evaluate Colorado’s existing accountability systems and propose recommendations for how to improve them. The report identified Colorado’s three misaligned accountability systems – district accreditation, SARs, and NCLB accountability – and proposed that Colorado strengthen and simplify accountability by creating “one performance-based system that gives educators, parents and communities a clear picture of school and district performance. The purpose of the system should be to ensure that all students meet the state’s academic standards and those students who have done so continue to progress.” To access the full report, please go to: http://www.dkfoundation.org/PDF/Final%20Recommendations.pdf.

These efforts prompted the Colorado legislature to support a bill that would have aligned these systems and required growth measures in the evaluation of school performance, but the bill was not signed into law. However, the report did serve as the catalyst for a number of key legislative bills and actions that would pass and follow in the subsequent years:

- HB-109 directed a Technical Advisory Panel to develop a growth model (2007). The Technical Advisory Panel comprised of representatives from key stakeholder groups, including CASE, the Colorado Association of School Boards (CASB), the Colorado Education Association, superintendents, and charter school and other advocacy groups.
- HB-1048 established student academic growth as the cornerstone of Colorado’s accountability system and required CDE to develop a longitudinal growth model (2008).
- Districts received CDE reports on the academic growth of their students using the newly-implemented Colorado Growth Model (2008).
- SB-163, the Educational Accountability Act, established a statewide system of accountability and support, requiring aligned annual school and district performance framework reports and annual school and district improvement plans.

In developing SB-163, CDE sought the feedback of multiple stakeholders. The Commissioner engaged superintendents and school boards statewide in listening and feedback sessions, where CDE presented scenarios for how growth and other performance indicators could be included in the accountability system. The legislation itself was developed in cooperation with key education leaders, with extensive feedback opportunities in reviewing drafts of the bill. The result was unanimous support from the State Board of Education and the passing of the bill virtually unopposed in both the Colorado House and Senate, given overwhelming support from stakeholders in how it reflected their values and recommendations.

Similarly, CDE approached the regulatory process in an inclusive way. Stakeholders were asked for their feedback on the draft rules, prior to their being promulgated as proposed rules, then given an
opportunity to provide formal feedback during the public comment period. The rules for SB-163, too, passed with unanimous support from the State Board of Education, having followed extensive discussions with urban and rural educators to ensure that they met the needs of the field. This included consultation with the Commissioner’s Superintendents Advisory Committee, comprised of the leadership of regional superintendent groups, the SB-163 Advisory Committee, comprised of representatives from boards, CEA, parent associations and other advocates, and the statutorily-required Technical Advisory Panel, technical field experts from across Colorado and the nation. To view the published comments of hundreds of stakeholders over four months, please go to “Comments and Responses on SB-163 Regulations” at: http://www.cde.state.co.us/Accountability/PerformanceFrameworksResearchAndPolicy.asp.

As Colorado has implemented SB-163 and its associated supports, CDE has continued to seek and respond to stakeholder input. To view the published comments of stakeholders regarding the implementation of Colorado’s accountability system after its first year, please go to “Comments and Responses on SB-163 Implementation” at: http://www.cde.state.co.us/Accountability/PerformanceFrameworksResearchAndPolicy.asp. Now into our second full year of SB-163 implementation and in response to adjustments as a result of this waiver request, CDE will convene an advisory panel of regional superintendent representatives, higher education, CASE and CASB on November 29, 2011.

Principle III: Supporting Effective Instruction and Leadership

Colorado’s educator effectiveness reforms are based in the landmark SB-191 legislation, Great Teachers and Great Leaders, which shifts the focus of career advance qualifications to demonstrated effectiveness based on student outcomes. Stakeholder input in the development of this law and its rules are especially critical.

Thus, SB-191 required that a 15-member State Council for Educator Effectiveness, appointed by the governor, make recommendations on implementation of a system for the evaluation of licensed personnel. The council was responsible for providing recommendations to the State Board concerning statewide definitions of effectiveness, performance ratings and evaluation standards for teachers and principals, and other guidelines for adequate implementation of a high-quality educator evaluation system. The State Council began meeting in March 2010 and has held 32 meetings to date. The council made recommendations to the State Board in April 2011. The state board, after conducting an extensive rulemaking process that included three formal rulemaking hearings and responses to written comments submitted by the public over the course of five months, adopted rules for administration of local evaluation systems on Nov 9, 2011. These rules will next be submitted to the General Assembly for final review. To view the published comments of stakeholders in response to the draft rules between June through November 2011, please see “Public Comments and Department Recommendations” at: http://www.cde.state.co.us/EducatorEffectiveness/RB-Rulemaking.asp.
For a detailed description of how Colorado continues to engage stakeholders in the state’s educator effectiveness reforms, please see Principle III of this request.

**Colorado’s ESEA Waiver Request**

Building upon each of the above reforms in standards and assessments, accountability and educator effectiveness, Colorado began the process of gathering input specifically related to the ESEA waiver request with the State Board of Education at its meeting on August 10, 2011, where an executive summary of CDE’s waiver proposal was presented. Additional meetings were held with Board members during the month of August and early September. A revised proposal was shared with the State Board of Education at its meeting held on September 14, 2011. At that meeting, the State Board gave its support to CDE staff to move ahead with its ESEA waiver request.

In late August, an executive summary of the ESEA waiver request was prepared for the Governor and his staff to ensure alignment of vision. Additional information was shared with the Governor and his staff at subsequent meetings.

Information related to CDE’s waiver proposal was presented to the Colorado NCLB Committee of Practitioners (CoP) at its meeting on September 7, 2011. A draft copy of the waiver proposal was sent to CoP members on October 29th. Feedback from CoP members was taken via email and at its meeting on November 2nd.

In meetings and events through the months of September and October, information regarding CDE’s ESEA waiver proposal was presented to, and feedback was solicited from, groups including the State Regional Superintendents Councils, Colorado Special Education Directors, Colorado Special Education Advisory Council, State Gifted and Talented Association, State English Language Acquisition Directors, and Colorado Regional Migrant Education Directors.

In October 2011, notices inviting public comment were sent to school district superintendents, school district Title I, II, and III program directors, the Colorado Education Association, Colorado Association of School Boards, Colorado Statewide Parent Coalition, and the Colorado Association of School Executives (see Attachment #1). Professional organizations were asked to disseminate the notice among their memberships and encourage their memberships to submit comments. An invitation to review CDE’s request and submit comments was in CDE’s weekly newsletter, The Scoop, which is sent weekly to over 2,500 subscribers.

CDE posted the notice inviting public comment and a draft of the waiver request on its website in late October. At the same time, a press announcement was released encouraging “students, parents, teachers, and all others interested in public education in Colorado” to read the proposal and submit comments.
In late October, CDE reached out to members of Colorado’s Congressional delegation through summaries and drafts of the waiver request.

On November 3, 2011, CDE presented its waiver request and solicited input at the MEGA meeting. The MEGA meeting is an annual meeting of English Language Learner stakeholders.

On November 4, 2011, CDE presented its waiver request to and solicited input from the Education Data Advisory Council (EDAC). EDAC, created by the State Legislature, is a council comprised of school district personnel, school board members, Board of Cooperative Educational Service (BOCES) representatives, and others that advises the Commissioner on issues related to data collection. The primary purpose of EDAC is to identify and eliminate the unnecessary collection of data and ensure the integrity of the data collection process.

CDE ended its period of accepting public comment on November 7, 2011, and provided an update to the State Board on November 9, 2011.

As CDE has engaged stakeholders in the development of its waiver request, many of the comments have referenced the credibility of the accountability system and the need to continue to hold schools and districts accountable for the performance of all groups of students.

As a result of the feedback it has received, CDE has made changes to the waiver request originally proposed. These changes are described in more detail within the body of this request; however, noteworthy modifications include:

- Modifying SES/Choice requirements rather than waiving them completely to ensure that parents and their students enrolled in struggling schools have options
- Including additional disaggregation of student results by student group
- Incorporating measures of English language proficiency into the state’s performance frameworks
- Focusing intensive CDE interventions and supports primarily on priority improvement and turnaround schools and districts

Colorado recognizes that stakeholder engagement is critical to the effective implementation of the state’s education initiatives and, ultimately, to moving the state to college and career readiness for all students. This ESEA waiver request builds upon existing Colorado reform efforts in standards and assessments, recognition, accountability and support, and educator effectiveness, each of which has been shaped extensively by the input of our stakeholders and communities.

Colorado also recognizes that stakeholder input must be ongoing. To ensure the continuous improvement of Colorado’s system of accountability and support, Colorado will continue to seek stakeholder input regarding the system’s performance annually. Colorado SB 163 requires the annual
convening of education stakeholders to provide input regarding the system’s strengths and areas of weakness. Toward that end, CDE has been hosting a series of meetings over the last several months to gather that input. Similarly, ESEA requires a Committee of Practitioners to oversee and evaluate the implementation of Colorado’s ESEA plan and to make recommendations for its improvement. The Committee of Practitioners meets quarterly. CDE will work these groups and others to engage critics of Colorado’s system, child advocacy groups, and other stakeholders in meaningful dialog with a goal of improving Colorado’s accountability system and improving outcomes for Colorado’s children.

Notices inviting public comment, public and stakeholder group comments received, and letters of support can be found in Attachments 2 and 3.
Evaluation

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

☐ Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.
OVERVIEW OF SEA’S REQUEST FOR THE ESEA FLEXIBILITY

Provide an overview (about 500 words) of the SEA’s request for the flexibility that:

1. explains the SEA’s comprehensive approach to implement the waivers and principles and describes the SEA’s strategy to ensure this approach is coherent within and across the principles; and

2. describes how the implementation of the waivers and principles will enhance the SEA’s and its LEAs’ ability to increase the quality of instruction for students and improve student achievement.

Colorado fully shares the values embodied in the ESEA flexibility package offered by President Obama and Secretary Duncan. Indeed, the thrust of Colorado’s education reforms of the past three years demonstrates our commitment to the implementation of rigorous college- and career-ready academic standards, strong assessments that measure progress toward high standards, thoughtfully constructed accountability tools, an educator effectiveness program with a formative focus, and the integration of all these components into a meaningful accountability system that targets supports where needed. The Colorado system not only delivers the required components, but extends the vision of this ESEA flexibility package in its promise to foster continuous improvement and ensure that all students are college- and career-ready by the time they graduate.

The system proposed herein is based on the performance and needs of individual students. Through the Colorado Growth Model, the state charts each student’s path to proficiency, which in turn leads to a higher level of accountability for districts and schools charged with the education of each student. The focus on individual students provides an unprecedented level of insight into the successes and challenges that educators face, and removes the incentive to focus on “bubble kids” (the students just within striking difference of the proficiency cut score), so that growth by all students is acknowledged and counted. Graphical representations of student performance (see Figure 1 below) have proven to be powerful catalysts of action in Colorado, illustrating not just where achievement gaps exist, but how much progress needs to occur at the individual level for such gaps to be closed. As demonstrated in the figure, these data provide greater information about a student—in this case, a partially proficient student. The student represented was proficient in math in 8th grade, but without at least high levels of growth in the next year will not be college- and career-ready in math in 10th grade. Geared with such information, school leaders understand not just the student’s current status, but the direction in which this student is headed, and can intervene in time.

Figure 1. Individual Student Growth Report
These individual targets, identifying the path to proficiency for each student, are aggregated at the school, district, and student group level. These data accurately show not only the level of growth of students in a school but, more importantly, to what level of achievement this current rate of growth is likely to lead. Such a determination is extremely useful for accountability purposes because it requires that growth lead to college- and career-readiness. Consequently, getting increasing numbers of students on track to reach proficiency is a way to determine clearly that improvement has occurred.

Student-level data also provide focus at the educator level. Teachers and principals use student-level data to plan instruction and direct intervention resources. At an aggregate level, educators analyze data by student group to decide whether their needs are being met by the curriculum and instruction, and also to identify which students need additional or adjusted instruction. Principals use these data, other student growth measures, and measures of professional practice to evaluate teachers. In turn, principals are evaluated based on individual student growth, other measures included in Colorado’s accountability system, and professional practice standards.

The State, through a set of key indicators and ambitious but attainable objectives, holds each school and district accountable for its performance. Strong consequences along with intensive supports are applied when performance is not at acceptable levels. Incentives and recognition drive high performance. Our performance frameworks use multiple measures and performance targets to identify the schools and districts in need of the most intensive support. The frameworks also clearly show how the performance of all students, as well as that of historically disadvantaged disaggregated groups, stacks up against those performance targets. Districts and schools are required to engage in the process of intensive inquiry, through the yearly development and implementation of an improvement plan. The State’s improvement plan template (Appendix 4) requires every school and district to reflect on its performance relative to state expectations, identify its greatest challenges and the root causes of these challenges, and chart a path forward that directly addresses problem areas. A crucial part of this plan is the clear presentation of benchmark performance as improvement efforts are implemented over time.
Such powerful tools exist not only for district staff, but for teachers, students, principals, parents and the entire community. Public accountability through transparency is a value that Colorado strongly relies on in this plan. It is only through comprehensive community involvement and effort that true change can occur. School and district improvement plans require extensive stakeholder input and are prominently posted on the state website for public access and scrutiny. Data from schools and districts are made available to the public and put into compelling online interfaces that encourage disaggregation, exploration, and comparison. Parents looking for information about local schools have fast and straightforward access to the extent to which each school is meeting or falling short of performance expectations.

The focus on continuous improvement toward the goal of college- and career-readiness for all students forms the backbone of Colorado’s system of education accountability. A single, comprehensive system using Colorado’s education priorities in standards and assessments, accountability and support, and educator effectiveness will allow us to see clearly where the goal is being met and where it is not.

By building a system based on the path of individual students to college- and career-readiness, CDE creates incentives to increase the quality of instruction and improve student achievement. This waiver package will enable our state to align its focus, resources, and supports on a single, comprehensive system. In creating and implementing the above mentioned reforms, Colorado has gone to great lengths to maximize the alignment of the state and federal systems of accountability. However, under the current ESEA authorization, Colorado is left implementing a dual accountability system consisting of two distinct sets of criteria used to assess school and district performance and two sets of labels, timelines and consequences for schools and districts identified as in need of improvement. Colorado believes that measuring and improving student growth is critical to achieving college- and career-readiness for all students, accordingly it has made growth a key indicator within its accountability system – and ESEA’s required accountability simply does not make adequate provision for the inclusion of student growth, even when it is growth to a standard. By creating a single system, our state will send a unified message to students, parents and educators regarding school and district performance, target resources and interventions to students, schools and districts in greatest need and alleviate unnecessary, duplicative, and wasteful administrative burdens on schools, districts and the State.

With a single, comprehensive system, CDE will continue to meet the accountability needs and principles of ESEA within this waiver request by using:

- State-established school and district performance indicators to meet Title I Adequate Yearly Progress requirements;
- Equitable distribution analysis and district performance indicators to meet Title II 2141(c) sanctions;
State-established English language growth and proficiency measures to meet Title III annual measurable achievement objectives requirements;

State-established school and district accreditation rules, performance categories, timelines, and consequences to meet Title I school and district improvement requirements;

State school and district performance frameworks and performance categories to target Title I School Improvement and Title I Choice and SES set-aside funds.

If granted the waivers included in this request, Colorado will have a single accountability system that is stronger and more credible, and will more readily bring about needed school improvements than the current state and federal systems. Here are some key pieces of Colorado’s waiver request.

- Colorado’s system includes more students and more schools than NCLB accountability. The state accountability system pertains to all schools, and includes 600,000 more students and 1,200 more schools than under NCLB.
- Colorado’s definition of college- and career-readiness sets a higher bar for proficiency than does No Child Left Behind. Beyond math, reading and graduation rates, student’s performance on writing, science, English language proficiency, the ACT, and dropout rates are all measured and considered.
- Colorado looks beyond whether students are currently proficient. It expects students to make enough growth to catch up if they are behind, or to keep up if they are already scoring at the proficient level.
- Colorado advances a focus on equity through meaningful disaggregation of all data, including academic growth and graduation rates in its accountability frameworks, and many other measures in reporting.
- All Colorado schools and districts—not only those that on NCLB Improvement—engage in improvement planning, regardless of performance. All schools and districts develop and implement improvement plans. Each plan is posted on CDE’s website for the public. This process promotes collaborative, data-driven inquiry around performance challenges, root causes, and actions necessary to improve student achievement.
- Colorado is committed to public inquiry and transparent reporting and that true accountability is public accountability. It has developed an interactive web-based portal, SchoolView.org, to provide unprecedented access to state education data.
- Colorado has designed and implemented a coherent system, confident that creating the right tension in the system will improve outcomes for students.
- Additionally, since submitting its initial waiver request, Colorado has launched its Expanded Learning Opportunities vision and plan. ELO is an innovative teaching and learning platform designed to ignite the unique potential of every student through the creation and delivery of dramatically personalized learning experiences. ELO transforms the learning experience to close achievement gaps and ensure college and career readiness for all students in Colorado. Critical to the success of the ELO vision is thinking differently about how we use time, resources, people, and technology to personalize learning. The waiver we seek for the 21st
Century Community Learning Center grants will allow us the flexibility to use some of these important grant funds to transform schools into high-quality expanded learning time schools based on the examples of the highest-performing expanded-time schools. The defining features of high-quality expanded learning time schools are:

- Significantly more time by expanding the school day, school week, or school year to increase learning time for all students;
- Using the additional time to support a well-rounded education that includes time for academics and enrichment activities;
- Providing additional time for teacher collaboration, common planning, and professional development;
- Partnering with one or more outside organizations, such as a nonprofit organization, with demonstrated experience in improving student achievement;
- Frequent examination of student data to identify individual student needs and better tailor instruction; and
- Better engage students and leverage community partnerships (including better integrating partners into the school day when they may have previously been relegated to non-school hours), technology, educators, and time within and beyond the classroom and the typical school day.

CDE sincerely appreciates this opportunity to demonstrate that its accountability system meets the intent and purpose of the NCLB requirements the Secretary has offered to waive and that our mission to move our education systems in Colorado towards greater personalization through the ELO strategy aligns with the vision that the Secretary recently unveiled as part of the Race to the Top - District competition. With an approved waiver request, Colorado will continue its efforts to innovate, increase the quality of instruction and improve student achievement for all students on their path to college and career success.
1A ADOPT COLLEGE-AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

Option A  
\( \checkmark \) The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.

i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)

Option B  
\( \square \) The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.

i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)

ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)

Preparing all students adequately for college- and career- success is the established goal of Colorado’s public education system. As part of the overall effort to bring the state closer to this goal, Colorado’s academic standards in all content areas have been revised from top to bottom, and brought into complete alignment with those in the Common Core. Transition from old to new standards will be complete in all local school districts in the coming two years. The new Colorado standards are forward-leaning and ambitious, and represent a coherent picture of what knowledge and skills will be needed, in all content areas, by the time students exit high school. Coherence and consistency are vital so that the entire Pre-K to postsecondary educational system is focused in the same direction.

Colorado’s complete commitment to college- and career-ready standards is demonstrated by Senate Bill 08-212, Colorado’s Achievement Plan for Kids (CAP4K). CAP4K grew out of the recognized need for higher, clearer standards for students in all content areas, including reading, writing, and mathematics. This legislation created the path for aligning Colorado’s education system from pre-school through postsecondary education. CAP4K called for next generation, standards-based education to prepare Colorado’s students for the increasing expectations and demands for higher-level critical thinking skills,
and national and international competition in the workforce. With the new law in place, CDE initiated a year-long process of revising academic standards in all of its ten content areas (the arts, comprehensive health and physical education, mathematics, reading and writing, science, social studies, and world languages) and English language proficiency in 2009.

CAP4K also required that the Colorado State Board of Education and the Colorado Commission on Higher Education (governing bodies for K-12 and higher education, respectively) co-adopt a definition of Postsecondary and Workforce Readiness (PWR), articulating a common focus on college- and career-readiness for Colorado. CDE’s partnership with higher education in defining PWR, and the participation of higher education faculty on the Colorado standards subcommittees, ensured that the design of the Colorado Academic Standards stayed squarely focused on college- and career-readiness.

Following this year-long standards revision process, in December 2009, the Colorado State Board of Education adopted the Colorado Academic Standards (CAS), creating Colorado’s first fully aligned preschool-through-high school academic expectations (see Attachment 4). The standards were developed by Coloradans across a broad spectrum representing Pre-K and K-12, higher education, and business, and utilized the best national and international exemplars. These standards are the basis for a system that adequately prepares Colorado schoolchildren for achievement at each grade and, ultimately, successful performance in postsecondary institutions and/or the workforce.

Concurrent to the revision of the Colorado standards was the Common Core State Standards (CCSS) initiative, the process and purpose of which significantly overlapped with that of the CAS. Led by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA), these standards present a national perspective on academic expectations for students, kindergarten through high school, in the United States. These college- and career-ready standards have been adopted by 44 states and were designed to align with college and work expectations, contain rigorous content, and require application and higher order thinking.

Upon the release of the CCSS for Mathematics in June 2010, CDE began a gap analysis process to determine the degree to which the expectations of the CAS aligned with the CCSS. The independent analysis conducted by WestEd’s Assessment and Standards Development Services program indicated a high degree of alignment between the two sets of standards, noting where the standards were aligned and where content was unique to either Colorado’s standards or the CCSS. WestEd also provided detailed notes pertaining to the analysis in an annotated version of the CAS document.

Using this information, on August 2, 2010, the Colorado State Board of Education adopted the Common Core State Standards in mathematics and English/language arts, and requested the integration of the entirety of the CCSS with the Colorado Academic Standards (see Attachment 4). Colorado refers to its new standards, inclusive of the CCSS, as the Colorado Academic Standards (CAS) and the Colorado English Language Proficiency Standards (CELP). The CAS in mathematics and reading, writing, and communicating fully integrate the entirety of the Common Core State Standards and include legislative aspects specific to Colorado, including personal financial literacy, 21st century skills, and components
related to postsecondary and workforce readiness (PWR). During Fall 2010, the CCSS were fully integrated into the CAS and the department reissued the CAS in mathematics and reading, writing, and communicating in December 2010.

1.B  TRANSITION TO COLLEGE-AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled *ESEA Flexibility Review Guidance*, or to explain why one or more of those activities is not necessary to its plan.

Colorado’s transition plans to the CAS (which, as noted above, include the entirety of the CCSS) involve ensuring accessibility and high expectations for all students, conducting rigorous gap analyses, determining a transition timeline, conducting a comprehensive outreach and dissemination effort, and continuing to expand access to postsecondary coursework for high school students. As demonstrated in the following areas, this implementation is already well underway in Colorado.

**Gap Analyses and Alignment**

Throughout the standards revision process in 2009, CDE engaged WestEd to conduct gap analyses to guide the development of each content area standards (found at [http://www.cde.state.co.us/cdeassess/UAS/2009StandardRevision/ReviewResources.html](http://www.cde.state.co.us/cdeassess/UAS/2009StandardRevision/ReviewResources.html)). Following release of the CCSS in June 2010, WestEd conducted a gap analysis to identify any areas of misalignment between the CCSS and the CAS. Taken together, these analyses informed the creation of standards crosswalk documents for each of the ten academic content areas. These documents were instrumental in the creation of transition plans for the department and districts (see crosswalk documents at [http://www.cde.state.co.us/cdeassess/UAS/Crosswalk/CAS_Crosswalk.html](http://www.cde.state.co.us/cdeassess/UAS/Crosswalk/CAS_Crosswalk.html)). Crosswalk documents for mathematics, reading, writing, and communicating were revised and reissued in 2011 to reflect adoption of the CCSS.

**Accessibility**

Transitioning to new standards involves multiple levels of communication and support to ensure that all students have an opportunity to master all standards. Colorado has approached this work intentionally and with particular consideration for English learners and students with disabilities.

Colorado is firmly committed to making sure that the special needs of English learners are given the attention they deserve. This effort starts with English language development and instructional services for students not yet fluent in English, in a time-frame parallel to that of the CAS. The state adopted the World Class Instructional Design and Assessment (WIDA) English language proficiency standards using the same timeline and process as content area standards in December 2009. Subsequently, Colorado
adopted the CCSS in English Language Arts and Mathematics. To emphasize that the WIDA English language proficiency (ELP) standards are Colorado standards, Colorado has named its new ELP standards the Colorado English Language Proficiency (CELP) standards, just as the CCSS are called the Colorado Academic Standards (CAS).

In order to assess the alignment and linkage of this new set of WIDA-based ELP standards with those of the Common Core, an independent alignment study was prepared for the WIDA consortium (http://www.wida.us/Research/agenda/Alignment/). Results, released in March 2011, indicate strong alignment between the WIDA ELP standards and the Common Core State Standards English Language Arts and Mathematics.

CDE’s statewide professional development efforts support districts’ implementation of all new standards with a focus on academic language and connections between CELP standards and CAS. CDE models for districts the work of cross-unit teams that include content and English language acquisition specialists. Educators’ consideration and understanding of linguistic demands while teaching challenging and relevant academic content ensures that English learners have the opportunity to access and achieve Colorado’s college-and career-ready standards on the same schedule as other students.

Colorado is committed to ensuring access to grade-level content and learning expectations for students with disabilities. CDE’s Standards Implementation Team includes members from special services, the Exceptional Student Service Unit (ESSU), to ensure that resources and support materials are inclusive and that outreach and communication to the field is consistent throughout the Department. CDE offers instructional and assessment accommodation guidance to school districts. The ESSU has worked jointly with the Unit of Student Assessment to create and annually update an Accommodations Manual for this purpose. ESSU offers professional development training opportunities on instructional accommodations. Additionally, the ESSU monitoring process includes Individualized Education Program file reviews specific to the appropriate documentation of accommodations for instructional and assessment purposes. Expectations for students with disabilities to achieve the college-and-career ready standards are the same as for students without disabilities. Additionally, CDE has designed and adopted alternate achievement standards in mathematics, science, social studies, and reading, writing, and communicating for students with significant cognitive disabilities under section 602(3) of the Individuals with Disabilities Education Act.

**Transition Timeline**

CDE is committed to supporting Colorado school districts in the transition to Colorado’s new standards. Because Colorado is in the unique position of implementing standards in all academic areas simultaneously, the Department has carefully planned a multi-year transition process. The framework for Colorado’s transition plan is illustrated in Figure 2. CDE is following a standards implementation support plan that includes four phases: (1) awareness (school year 2010-11); (2) transition (school years 2011-13); (3) full implementation (school year 2013-14); and (4) transformation—an ongoing process of continuous improvement in teaching and learning. Awareness involves communication about the CAS;
transition involves planning for required changes; implementation involves instituting the necessary changes; and transformation represents the intended outcome of implementing college- and career-ready standards.

Figure 2. Colorado’s Transition to New College- and Career-Ready Standards

CDE has provided a Transition Overview (see Table 1 below) to inform district and school leaders about the transition process, including recommended focus areas for the district, school, and teacher level. The transition overview was designed to guide districts in fulfilling the legislative requirements of CAP4K, and a Standards Implementation Toolkit (http://www.cde.state.co.us/sitoolkit/index.htm) contains resources and tools. According to CAP4K, districts are required to review and revise local standards relative to the CAS and CELP by December 2011. Subsequent to the review, districts are required to adopt standards that meet or exceed state standards, design and adopt curriculum based on the standards, and adopt assessments in areas not assessed by the state.

Although adoption of the CAS by all local school districts is a requirement under this state legislation, it is by no means the final step of implementation. After adoption, the new standards need to be addressed in the curriculum and classroom teaching practices at every grade. The Transition Overview below (Table 1) includes specific guidance related to curriculum design. As a local control state, Colorado does not have a state curriculum, nor does the state require or recommend that districts use state selected textbooks or instructional materials. Instead, Colorado defines curriculum as “an organized plan of instruction for engaging students in mastering standards.” Thus, Colorado’s transition plan is intentionally designed to support districts in the adoption of a new standards-based curriculum. CDE’s guidance to districts is to use the 2011-12 school year to design a standards-based curriculum and begin phasing it in during the 2012-13 school year. By using the two school years to design and begin implementation of a standards-based curriculum, districts can support a thoughtful standards transition process.
Table 1: Transition Overview for Colorado School and District Leaders

<table>
<thead>
<tr>
<th>What Should Districts Do?</th>
<th>2011-12 Transition Year 1</th>
<th>2012-13 Transition Year 2</th>
<th>2013-14 Full Implementation</th>
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<td>21st century skills</td>
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<td>Familiarity with standards-based teaching and learning cycle</td>
<td>Implement standards-based teaching and learning cycle</td>
<td>Integrate formative practice into instruction</td>
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<td>Develop familiarity with new grade level content</td>
<td>Develop expertise with new grade level content</td>
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What Should Be Educators’ Instructional Focus?

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What is Happening with Assessment?

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Outreach and Dissemination
A key component of the transition is a communication plan that facilitates district-level transition planning. Colorado is committed to engaging all necessary stakeholders in the transition to college- and career-ready standards, including educators, administrators, families, and institutions of higher education (IHEs).

Educators and Administrators
The purpose of outreach to educators and administrators follows the four phase transition plan: awareness, transition, implementation, and transformation. Representative outreach and dissemination activities and resources are described below.

Awareness (2010-11)
- Regional Awareness Trainings were held in 12 cities across the state during the summer of 2010. Trainings focused on the standards revision process, design features of the CAS and CELP, and increased rigor and thinking skills required by the new standards.
- Comprehensive awareness outreach was conducted throughout Colorado in 2010 through presentations at Boards of Cooperative Education Services (BOCES) and regional superintendent meetings and at all professional educator conferences (e.g., Colorado Association for School Executives, Colorado Association of School Boards, Colorado Education Association, Colorado Staff Development Council, Colorado Council for Teachers of Mathematics, Colorado Council International Reading Association, and the Colorado Charter School Institute).
- Regional principal awareness trainings were conducted during fall 2010, in partnership with the Tointon Principal Institute at the University of Northern Colorado.
- Monthly online office hours were offered throughout 2010. These live and archived webinars were designed to inform Colorado educators about the development and design features of the CAS and CELP. Archived webinars can be found at: http://www.cde.state.co.us/cdeassess/UAS/Online_Office_Hours.html#2010.

Transition (2011-12): Leadership Transition Planning Focus
- Regional Transition Trainings were held in five cities across the state as a part of the CDE Summer Symposium 2011. The training focused on transition resources and planning for school and district leaders.
- Monthly online office hours were held via webinars designed to keep district and school leaders informed of tools and resources to assist with standards implementation.
- An online Standards Implementation Toolkit was launched in June 2011, to support district and school administrators in leading standards awareness and transition.
- A series of 10 training sessions for the CELP Standards to support English language learner mastery of the CAS was conducted in the fall of 2011, involving CDE staff from the Language, Culture, and Equity office, the Office of Federal Programs Administration (Title III) and the CDE content specialist team.

- During the 2012-13 school year, CDE plans to continue outreach for the transition phase to the new standards which will include an intensive professional development focus for administrators and educators on the CAS and CELP.
- CDE staff includes content specialists in mathematics, literacy, science, social studies, comprehensive health and physical education, and the arts. Additionally, CDE has expertise in English language learners in the office of Language, Culture, and Equity and the Office of Federal Program Administration. Together, these teams have been trained in the WIDA standards that Colorado has adopted as its English language proficiency standards. In addition to co-planning and co-presenting during the CELP training sessions in fall 2011, plans to integrate WIDA training into content area administrator and teacher professional development are underway.
- CDE will base educator and administrator professional development on a revision of the Colorado Standards Based Teaching and Learning Guide, currently underway. The first edition can be found at: http://www.cde.state.co.us/Communications/download/PDF/StandardsBasedTeachingLearningCycle.pdf. It is being updated to reflect the rigor of the new standards as well as to support educators and administrators in using instructional materials aligned with those standards and data on multiple measures of student performance (e.g., from formative, benchmark, and summative assessments) within the context of the standards-based teaching and learning cycle. Rubrics for supporting the standards-based teaching and learning cycle at the classroom, school, and district level are also being revised. Together, these materials will form the foundation of department support to Colorado educators, administrators, and district leaders in leading instructional transformation.
- Colorado is a pilot state—along with Delaware, Kentucky, Louisiana, Massachusetts, New York, and North Carolina—for the Strategic Learning Initiative (SLI), a project of CCSSO, the Bill and Melinda Gates Foundation, and the Carnegie Corporation. The SLI, when fully developed, will provide teachers with instructional and assessment tools and content to differentiate instructional approaches based on individual students’ needs in order to meet the CCSS.

Institutions of Higher Education

The CAP4K legislation required that all educator preparation programs at institutions of higher education align their content to the new CAS by December 15, 2012. The Colorado Department of Higher Education (DHE) and CDE have been engaging these institutions actively over the past two years to bring about these changes. As a result, students now in the pipeline, preparing to enter the educator workforce in Colorado colleges and universities, already will have been trained on the new standards when they begin working in Colorado’s school districts.

Colorado is the recipient of an alignment grant from three foundations (Lumina, William and Flora Hewlett, and Bill and Melinda Gates) in support of K-12/postsecondary alignment activity around the CCSS and aligned assessments in 10 leading states. The goal of the grant is to promote successful implementation of the CCSS and the aligned assessments and shared ownership of college readiness by
the K-12 and postsecondary sectors. A specific focus of the grant is the use of the aligned assessments as one element in the determination of a student’s readiness for placement into credit-bearing courses by postsecondary institutions. In partnership with the DHE, CDE is planning outreach to IHE faculty related to alignment of academic expectations for pre-school through postsecondary students and revision of educator preparation programs. CDE and DHE have initiated plans for outreach through the Council of Colorado Deans of Education. Regional meetings with both content and education faculty will be conducted through 2012 to introduce the new standards and promote shared understanding of increased academic expectations. Specific training on the CELP Standards will be provided to higher education faculty as a support for English language learners in mastering the CAS as well as a means of supporting all students in developing academic language to meet content area standards.

Simultaneously, CDE and DHE have partnered with The New Teacher Project (TNTP) to develop an effectiveness-based system of educator licensure, induction, and preparation that is aligned with the new standards and educator evaluation system. The Colorado Educator Pipeline Task Force, created in August 2011, will provide recommendations and input to guide and inform the first phase of the initiative, which will focus on educator licensure and induction. The task force will be comprised of key stakeholders, including Human Resources leaders from local school districts, teachers, administrators, and educator preparation program representatives. Recommendations and input of the task force will guide CDE, DHE, and TNTP in redesigning licensure and induction to better meet the needs of educators and to help Colorado achieve its vision of effective educators for every student and effective leaders in every school.

The task force will provide input and recommendations to guide project staff in the production of three key deliverables:

1. Design options for the new system to be presented to the State Board of Education for their consideration (December 2011).
2. Initial redesign of educator licensure and induction, inclusive of the following elements: criteria and processes for approval of induction programs; criteria and process for licensure; and roles, responsibilities, and resource requirements for CDE (Spring 2012).
3. Final redesign of educator licensure and induction, revised based on public input on the initial redesign (Summer 2012).

Combined with outreach efforts to IHEs, the Colorado Educator Pipeline Task Force deliverables will create information and policy levers to impact programs to prepare educator and principals to meet Colorado’s college- and career-ready standards.

Parents
CDE is currently working with the Colorado Parent Teacher Association (PTA) and other statewide parent networks to provide outreach materials specific to parents. The National PTA has developed materials specific to the CCSS. Colorado will work to create similar materials for content areas not included in the CCSS in order to provide families with a comprehensive understanding of Colorado’s new college- and career-ready standards in all content areas.
Expanding Access to Postsecondary Coursework
CDE plans to expand access to postsecondary coursework primarily through the concurrent enrollment and ASCENT programs. In May 2009, the Colorado State Legislature passed House Bill 09-1319 and Senate Bill 09-285, the Concurrent Enrollment Programs Act. The collective intent was to expand access to and improve the quality of concurrent enrollment programs and improve coordination between institutions of secondary education and IHEs. Beyond coordinating and clarifying the existing concurrent enrollment programs, the bill also created the “5th year” Accelerating Students through Concurrent Enrollment (ASCENT) program, for students to remain in high school beyond the senior year for additional postsecondary instruction. Students in the ASCENT program can earn both a high school diploma and college certificate or an associate’s degree over a five-year extended high school experience, without the additional cost of postsecondary tuition. The following details the increased enrollment since the program started in the 2009-10 school year, using the mandated district submission of estimated number of students participating in the ASCENT program:

- 2009: 277 students requested in 6 school districts
- 2010: 2,477 students requested in 43 school districts
- 2011: 1,231 students requested in 40 school districts

In addition, Colorado is expanding students’ pathways to college and careers through Individual Career and Academic Plans (ICAP) and the School Counselor Corps Program. The School Finance Bill (SB 09-256) requires that each ICAP include the student’s:

- Effort in exploring careers, including interest surveys that the student completes;
- Academic process, including the courses taken, any remediation or credit recovery, and any concurrent enrollment credits earned;
- Experiences in contextual and service learning;
- College application and resume, as they are prepared and submitted; and
- Postsecondary studies as the student progresses.

The goals of the ICAP system ultimately are to decrease dropout rates and increase graduation rates by assisting students and their parents in developing and maintaining a personalized postsecondary plan that gives a clear picture of readiness for postsecondary and workforce success. Over the past year, CDE has partnered with DHE, the Colorado Community College System and districts to fully implement ICAP requirements. By fall 2011, all students in grades 9 through 12 should have access and assistance to personalized plans that are aligned with the Postsecondary and Workforce Readiness assessment attributes adopted by the Colorado State Board of Education and the Colorado Commission of Higher Education.

Additionally, the School Counselors Corps Grant Program was created to increase the graduation rate within the state and increase the percentage of students who appropriately prepare for, apply to and continue into postsecondary education. The grant program provides three-year grants, awarded on a competitive basis, to increase the availability of effective school-based counseling within secondary schools with a focus on postsecondary preparation.
In the first cohort of the three-year grant (2008-2011), 90 schools in 37 districts and/or the Charter School Institute were awarded School Counselor Corps funds. Schools served by the grant demonstrated the following outcomes: 1) decreased cumulative dropout rates from 5.2 percent to 4.6 percent from 2008-09, while non-funded schools with similar dropout rates and poverty rates saw increased dropout rates over the same time period, and 2) increased college preparation, as summarized in Table 2 below.

Table 2. School Counselor Corps College Related Data

<table>
<thead>
<tr>
<th>School Counselor Corps College Related Data (2008 to 2011)</th>
<th>Year One</th>
<th>Year Two</th>
<th>Year Three</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Completed Free Applications for Federal Student Aid</td>
<td>1,240</td>
<td>3,405</td>
<td>2,752</td>
</tr>
<tr>
<td>Number of College Applications Sent</td>
<td>8,911</td>
<td>9,922</td>
<td>12,053</td>
</tr>
<tr>
<td>Number of Scholarship Applications Submitted</td>
<td>3,543</td>
<td>7,612</td>
<td>6,153</td>
</tr>
<tr>
<td>Total Scholarship Dollar Amount Received</td>
<td>$18,172,719</td>
<td>$23,682,426</td>
<td>$32,826,836</td>
</tr>
</tbody>
</table>

Given such positive findings, the School Counselor Corps Grant Program plays a major role in creating models and best practices for efforts to increase graduation rates and decrease dropout rates.

Implementing an Integrated Standards, Instruction, and Assessment System

As the department engaged stakeholders from across the state in the standards and assessment revision process called for by CAP4K, the need for a more instructionally appropriate assessment system was expressed. Additionally, Colorado educators indicated a desire for a more integrated approach to standards, instruction, and assessment. Thus, CDE is taking a comprehensive approach to the development of formative assessment and instructional resources, especially as they relate to the new CAS.

CDE is developing a plan to build and sustain instructional and assessment expertise and effective leadership models necessary to prepare students to be college- and career-ready without need for remediation. A regional content specific model is being designed to build local expertise in setting educator success measures, modeling effective teaching and distributing the most effective classroom practices to every teacher. This model will serve as the state’s production and delivery system. With CDE in a leadership role, Colorado educators are both the designers and the leaders of the relevant work oriented to specific content areas and the conscientious sharing of the most efficient practices.

To this end, CDE has begun planning to develop and facilitate a network of Content Collaboratives, to engage Colorado educators in the creation and dissemination of standards-based assessment and instructional materials for use in the classroom. The CAS require students to skillfully apply and transfer
their content knowledge across multiple environments. As such, educators must find new and innovative approaches to guiding students towards this objective.

**Purposes of the Content Collaboratives**
- Develop instructional and assessment expertise in content by modeling high-quality assessment embedded in mastery-based instructional practices.
- Develop instructional and assessment leadership capacity in the field.
- Serve as a sustainable professional learning community for Colorado educators.
- Streamline CDE support and facilitate collaborative resource development with the field.

**Outcomes of the Content Collaboratives**
- Increase student achievement through improved instructional and assessment practices in every classroom.
- Ensure enactment of Colorado’s education reform initiatives in every classroom.
- Ensure authentic and active participation in reform initiatives by educators across Colorado.
- Encourage more effective use of district professional development budgets and time.
- Decrease the need for remediation.

**Work Products/Deliverables of the Content Collaboratives**
- Develop instructional modules and tasks based on the CAS.
- Identify/create measures of student growth in all content areas embedded within the instructional modules and tasks; all grades and progression areas phased in over time.
- Develop strategies for actionable use of assessment data. New standards and the resulting assessments will require that educators: (1) have greater understanding of the purposes and uses of formative, interim/benchmark, and summative assessments; and, (2) be able to demonstrate competence in the interpretation of information that directs timely adjustments to benefit academic programs, instruction, and student learning.
- Identify attributes of best practices and demonstrations of mastery.

CDE’s newly adopted assessment system attributes include the development of state-supported formative and interim assessment resources. CDE will offer exemplary, voluntary interim assessment tools aligned to the state-tested subjects and grade with the goal of providing interim assessments aligned to all standards. Interim assessments in the state-tested subjects and grades are being developed for use by Colorado schools in 2014-2015. CDE also will provide a vetting process and rubrics to assist LEAs in purchasing or designing rigorous and standards-focused interim assessments for all grades and all content areas, as resources allow.

As an active participant in both RttT-funded assessment consortia, CDE intends to leverage the assessments and assessment literacy resources that are developed in those processes once they become available.
Additional Professional Development around English Learners and Students with Disabilities

All professional development and training for standards is predicated upon the understanding that all standards apply to all students - including those with disabilities and English language learners - and that all content teachers are responsible for the learning of all of their students. The CDE Standards Implementation Team includes representatives from CDE’s Exceptional Student Services and Language, Culture, and Equity units allowing for substantial inclusion of support for students with disabilities and English learners in standards implementation planning, including all resources, tools, and professional development. The revised version of the Standards Based Teaching and Learning Guide will serve as the basis of educator professional development. The revision includes differentiation for students with disabilities as well as language learners.

Colorado English Language Proficiency Standards (CELP) - Professional Development in support of English language learners

The Colorado Department of Education adopted new English Language Proficiency Standards and developed a professional development plan that would target not only ESL/ELA teachers but would also include content teachers, specialists, as well as school and district leaders. The State of Colorado adopted the ELP standards developed by the WIDA organization. These standards framed a major change in ELP Standards for Colorado. Thus, a need for intentional professional development throughout the State was identified.

Therefore, CDE planned a ten city tour that would help not only ensure that school districts would include the new CELP Standards as part of the larger standards implementation effort but would also help build their capacity to implement them. The CELP development and implementation team included Content Specialists in all disciplines, the Office of Language, Culture and Equity, Unit of Student Assessment, and the Office of Federal Program Administration. The professional development was developed with a goal of building local capacity to effectively implement the State’s new standards. CDE recognized that it alone would not be able to train all teachers in the State on the new CELP Standards, so the training was designed so that content experts, ELA experts, coaches, content teachers and ELA teachers could attend as a team and then, in turn, could deliver the same training in their respective districts. The training included a full day Trainer of Trainer model, as well as a half day training designed and targeted to building, school and district leaders.

The TOT training was marketed to a great extent to content teachers, grade level teachers, and content experts, as we knew that ELA personnel had the background information necessary to understand the framework and theory behind the WIDA developed ELP Standards. Because these standards are grounded in Academic Language, a new focus for grade level and content teachers would be necessary to ensure they gained the tools necessary to provide content and concept access to ELLs in their classrooms.
The full day training included modules in the following areas: Language Acquisition, Orientation to the CELP Standards and all components, Academic Language, Transformation of Model Performance Indicators, and Implementation Planning.

In addition to the full day TOT training, a half day training was offered to the school, building and district leaders. Given the drastic change and shift in the CELP standards, it was very clear that CDE had to get “buy in” from leaders to ensure the training and Standards were implemented with fidelity and with appropriate human and fiscal resources. Modules in this training included: State and Federal Laws/Requirements with respect to ELLs, Language Acquisition, Academic Language, CELP Standards Orientation , and Planning/Implementation of Standards.

The State received overwhelming response to the training and approximately 600 practitioners attended the 10 city tour. The evaluations indicated that the training was highly successful and that additional training would be helpful moving forward.

Currently, three events are in the planning phases for additional professional development for Content teachers, ELA teachers and specialists.

1) Institutes of Higher Education training – training specifically for Higher Education on how colleges and universities can incorporate the new CELP standards into their teacher preparation programs.
2) Standards Implementation Summit – March 2012
3) Second phase of CELP Standards Training - Second round of CELP standards training based on a needs assessment from the field. It will have a greater focus on specific content areas and instruction.

The following announcement, released in CDE’s “Scoop” newsletter and sent to all school districts, reflects that the intent of the CELP training was a trainer-of-trainers model to build the capacity of all teachers to effectively teach academic content to English learners.

Scoop Announcement-CELP Standards Professional Development

Announcement

Title: “10 City Tour of the Colorado English Language Proficiency Standards”

Attn: Superintendents, District administrators, Principals, ELA and Curriculum Directors/Coordinators, Coaches, Professional Developers, Teachers, and Teacher Leaders

Registration for the 10 City Tour of the Colorado English Language Proficiency (CELP) Standards is now open. To register go to http://www.cde.state.co.us/scripts/CELPTrainingReg11/registration.asp Space is limited to a maximum of five people per district. District teams may include, but are not limited to, an administrator, coach/TOSA, two content teachers (1 elementary and 1 secondary), EL
There are two strands for the trainings. One is for administrators/decision-makers (e.g. central office, principals, educational leaders, board members) and the other is for all other participants who will serve as trainers for other personnel in their districts. Administrators only need to attend half the day, leaving after lunch. All others attend the full day training. The training is from 9:00 a.m. to 4:00 p.m. at all sites.

The 10 City Tour seeks to support Colorado school districts on the implementation of the new Colorado English Language Proficiency (CELP) standards to ensure English language development and access to academic content for English Learners. The CELP standards facilitate content instruction, impact curriculum through academic language and create a bridge to the Colorado Academic Standards (CAS).

Tour Locations and Dates:

- **Ridgway**: September 14, 2011
- **Grand Junction**: September 15, 2011
- **Limon**: September 21, 2011
- **Greeley**: September 22, 2011
- **Durango**: September 28, 2011
- **Alamosa**: September 29, 2011
- **Boulder**: October 5, 2011
- **Aurora**: October 6, 2011
- **La Junta**: October 19, 2011
- **Colorado Springs**: October 20, 2011

For more information contact:
Genevieve Hale
Office of Federal Program Administration
303-866-6618
hale_g@cde.state.co.us

Professional Development in support of Students with Disabilities

CDE provides online classes, professional development, and instructional tools that target the needs of students with disabilities. To help build local capacity, most utilize a trainer of trainer model. Below is a listing of some of the professional development opportunities. All of the following are intended for both general education and special education teachers.

Online Classes

- **Family, School and Community Partnering: Multi-Tier System of Supports**
  - The goal of this course is to provide Colorado PreK-12 education stakeholders with the shared knowledge and resources to effectively implement multi-tier family, school, and community partnering in supporting school success for all students – both in individual roles and as team members, consultants, or
ii. organizations. A primary focus is the shift from traditional parent involvement at school to active family partnering in coordinating learning between home and school. The research and legal rationales for this shift are highlighted, while continually applying the findings in a practical way to school, home, and community settings.

b. Improving Math Outcomes for Students with Disabilities
   i. This online course directly addresses how to improve outcomes for students with disabilities in the area of math, with a particular emphasis on students with SLD in the area of math. It introduces current understandings of how math develops, includes instructional strategies known to improve performance of students who struggle, and also provides tools for progress monitoring and diagnostic assessment. It supports all educators as they implement the criteria for SLD eligibility.

c. Assessment/Progress Monitoring for Behavior Interventions
   i. This online course addresses data collection, data analysis, and decision-making as part of a problem-solving process throughout the universal, targeted, and intensive systems of social-emotional support. The course provides the foundation for monitoring student progress for the purpose of evaluating the effectiveness of behavior interventions in school. This class is appropriate for all teachers. (This class is a prerequisite for the Introduction to FBA/BIP class.)

d. Assessment/Progress Monitoring Overview and Preparation in an RtI Model: What You Need to Know About Students with Disabilities
   i. This online course provides the foundation for assessment and monitoring progress within a Response to Intervention framework in elementary and secondary settings for students with disabilities and those suspected of having a disability in preparation for special education referral. Participants gain an understanding of the types of assessment and specific resources geared toward targeted and intensive progress monitoring for special education evaluation. This directly contributes to ensuring a body of evidence as required by the state's Specific Learning Disability eligibility criteria. This also provides special educators with data on the effectiveness of interventions for students with disabilities. This class is appropriate for general education teachers, specialists, special education teachers, and administrators.

e. Problem Solving Consultation
   i. The problem-solving process is pivotal to RtI implementation with fidelity and directly contributes to the validity of the body of evidence required for SLD eligibility determination as well as other disability categories. This module targets the problem-solving that occurs at the individual student level utilizing a consultant model to gain information and to support special education teachers, general education teachers, related service providers, and parents throughout the problem-solving process.
f. Improving Literacy Outcomes for Students with Disabilities
   i. This course provides professional development based on current scientific research regarding reading assessment, instruction and intervention. Content focuses on literacy skill development for students in kindergarten through 3\textsuperscript{rd} grade in the areas of phonological awareness, phonics, reading fluency and spelling. Participants gain an understanding of literacy development for average readers in order to more accurately understand and identify students with reading disabilities such as dyslexia. This course provides primary teachers and specialists with information and resources to intervene appropriately and develop a body of evidence for identification and instruction for students with reading disabilities.

Regional Training
   a. Family, School, and Community Partnership
      The goal of this course is to provide Colorado PreK-12 education stakeholders with the shared knowledge and resources to effectively implement multi-tier family, school, and community partnering in supporting school success for all students – both in individual roles and as team members, consultants, or organizations. A primary focus is the shift from traditional parent involvement at school to active family partnering in coordinating learning between home and school. The research and legal rationales for this shift are highlighted, while continually applying the findings in a practical way to school, home, and community settings. The ultimate goal is to build capacity at the district level in support of the development of these partnerships to assist schools in facilitating parent and family involvement as a means of improving services and results for students with disabilities.

   b. Regional development of model autism and significant support needs programs
      This project is a collaborative effort to implement the RtI process to build quality programs for students with SSN and ASD. Using both SSN and Autism Quality Indicators as guidelines and to collect data measuring current program practices, baselines and target goals will be set. We began with 2 administrative units across the state in various settings. Year 1 (09-10) SSN sites include Adams 12 (Metro) and Mountain BOCES (Western Region). For Year 2 (10-11) we will expand the project in these AUs to include preschool and MS programs and bringing on 2 more AUs to develop model elementary programs.

   c. Autism Spectrum Disorders
      Regional professional development trainings on content-specific autism topics will be conducted. Topics have been selected from the 11 Established Treatments showing evidence based practice from National Autism Center (2009) and recommendations from the Colorado Autism Commission’s Ten-Year Strategic Plan (2008).

   d. Specialized Instruction for Elementary and Middle School Students with Math-Related Learning Disabilities

   e. Improving Reading Comprehension of Students with SLD through Effective Vocabulary and Morphology Instruction
f. **Mentor Program for Deaf/HH**
   Constantly evolving technology in the field requires frequent updating of skills for staff working with D/HH students—especially cochlear implanted students. Mentors assist staff to work as teams, to appropriately utilize technology and to develop and implement appropriate IEPs.

g. **Transition Leadership Institute**
   This institute is part of the capacity building model that Paula Kohler and NSTTAC have obtained a 5 year grant from OSEP to implement. This model provides planning, professional development and leadership training opportunities for all Colorado Aus. Specific Goals for the Institute will be identified each year based on data collected throughout the year including Ind. 13 data, outcomes of completed Transition Plans, and implementation (levels of use) of specific professional development provided at the Institute.

h. **Targeted Transition Training**
   This activity provides direct instruction to secondary practitioners related to the IDEA 2004 Transition requirements. Training will provide a basis for “self-review” and capacity building that ensures compliant transition focused IEPs. This activity is a precursor to Indicator 13 file reviews or a post-review training for corrective action purposes.

i. **Cultural and/or Linguistically Diverse Toolkit (trainer of trainer model).** Webinars and Blackboard trainings on the appropriate referral and identification of CLD students suspected of having disabilities.

**Approach to Evaluating and Adjusting Current Assessments**
Colorado is fully committed to adopting and implementing a state-of-the-art assessment system that will measure students’ college- and career-readiness in key content areas. This commitment is evident through the CAP4K legislation, which focused the state’s strategic direction. Since the CAP4K legislation was enacted before Race to the Top-funded national assessment consortia had begun their work, CDE began planning to design a new state-developed assessment system, to be implemented by 2013-2014. An RFP is expected to be released this November for the new summative and alternate assessments, as well as other components of the system, so the process is well under way.

The planned development of a new state-developed system is dependent upon adequate funding by both the state and the federal government. In recognition of the reality of challenging fiscal times and of the potential benefits of a multi-state assessment, Colorado has been an active participant in both of the national assessment consortia. In the case that the development of a Colorado assessment system does not appear likely to be funded by the state legislature, Colorado’s participation in these consortia will guarantee that a Common Core-aligned national assessment system is available for the state’s use.

Colorado’s overarching commitment is to have assessments that are rigorous and aligned to college-and career-ready standards. At this time, Colorado is pursuing multiple avenues for ensuring that it will be able to implement assessments meeting that commitment. Should a state system not be developed, Colorado will be well positioned to participate in the first administration of one of the consortia assessments in 2014-2015. Should Colorado receive adequate funding, it still fully intends to leverage
consortia resources to support its own system. Discussions on how to provide comparable score information across assessments already have been initiated.

Changes to the current state assessments – Transition to the 2013-2014 Assessment Year

In 2011, CDE began to consider making adjustments to the state assessments currently used for state and federal accountability. Potential issues with revising existing assessment content and/or performance level descriptors (PLDs) and cut scores were discussed with the state’s Technical Advisory Committee (TAC), which included two district representatives, in January of 2011. The TAC recommended that the state’s current assessments should not be adjusted, for multiple reasons including the fact that Colorado was on a faster track to moving to its new assessments than most states. Colorado planned to have new assessments in place for 2013-2014.

The transition to college- and career-ready standards from Colorado’s previous set of academic standards requires substantial thinking, planning, and effort for schools and districts. In recognition of the magnitude of this effort, the state decided to make a smooth changeover to the next assessment system with a transitional assessment, called TCAP, based on the current test blueprint and using the same vendor, scale, and achievement level cut scores. This transitional assessment system essentially only includes content and grade-level expectations shared by both the old and new sets of standards, so it focuses attention on content and skills that will continue to be assessed in the future. This way there is not an abrupt, single switchover from old to new standards and assessments. As Colorado districts complete their implementation of the new academic standards in their curricula, materials, training and practice, the new assessment system aligned to the new standards will come online and the transition will be complete. ¹

Federal guidance refers to three possible activities: 1) raising the State’s academic achievement standards of its current assessments to ensure that they reflect a level of postsecondary readiness, or are being increased over time to that level of rigor, 2) augmenting or revising current assessments by adding questions, removing questions, or varying formats in order to better align those assessments with the State’s college- and career-ready standards, and 3) Implementing another strategy to increase the rigor of the assessment, such as using the “advanced” performance level on state assessments instead of the “proficient” performance level as the goal for individual student performance or using college-preparatory assessments or other advanced tests on which IHEs grant course credits to entering college students to determine whether students are prepared for postsecondary success. Each of these is addressed more specifically below.

*Raising the State's academic achievement standards on its current assessments*: Colorado rejected establishing new cut scores for technical reasons.

¹ It should be emphasized that the Colorado Growth Model can continue to estimate growth even when assessments change, provided that the underlying constructs remain constant.
First, the previous Colorado standards were not based on college- and career-readiness. On any assessment, there should be a relationship between the cut scores and the content standards. Reliance on a measurement tool that was not designed to measure the intended standards would lead to poorly aligned cut scores, and making valid inferences would be challenging. Secondly, implementing a strategy that merely involved setting new cut scores based on correlations related to a college readiness indicator could falsely imply that the assessment itself was covering the content of the new standards.

**Augmenting or revising current State assessments:**
Augmentation of the Colorado state assessments was rejected for two reasons. First, putting a new assessment in place with some type of hybrid of the new and old standards could result in unnecessary confusion and distraction for the field as it moves to fully implementing the standards by 2013-2014. Second, changing the content of the assessments would have required revising the assessment frameworks, blueprints, scoring and reporting of the assessments. Given the limited time span of two years, Colorado decided that this was not the best use of limited financial and human resources.

**Implementing another strategy to increase the rigor of current assessments:**
Colorado already has a rigorous high school assessment capable of measuring college readiness, including a college-preparatory assessment. Earlier assessments are already aligned to that level of rigor, based on previous standards.

Colorado already has a rigorous high school assessment capable of measuring college readiness, including a college-preparatory assessment. The current assessments are already aligned to that level of rigor, as demonstrated in the paragraphs below. Colorado continues to administer the ACT statewide to all 11th graders as part of its assessment system, except for those with the most significant cognitive disabilities. CDE recognizes the value of establishing a connection between its grade-specific assessments and college readiness indicators, as well as establishing the use of the state assessment as a predictor of future remediation needs in college. To this end CDE conducted two studies evaluating the relationship between CSAP scores and college readiness indicators.

The first study evaluated the relationship between Colorado state assessment results and ACT results. The study provided clear evidence that CSAP was an accurate predictor of later performance on the ACT. In fact, the correlation between CSAP in 10th grade and ACT is actually higher than the correlation between PLAN and ACT for Reading, Mathematics and Science. For 9th grade, the correlations between CSAP and ACT are higher than the correlations between EXPLORE and ACT for all content areas. For students, this means that their 9th and 10th grade CSAP scores are reliable indicators of whether they are on track for being college-ready as indicated by ACT.

The second study examined the relationship between Colorado state assessment results and Colorado college remediation needs for students (N=17,500). The study provided clear evidence that, if students were not proficient on the Colorado state assessment as early as the sixth grade, they were very likely to require remediation later when they entered college. In fact, 66% of non-proficient 6th grade students who later entered a Colorado college needed remediation. If Colorado schools analyze their current
state assessment results with this information in mind, they could readily identify which students are on track to being postsecondary ready and which students are not. As Colorado transitions to a new assessment system, based on college- and career-ready standards, it is anticipated that this predictive relationship would become even stronger.

Colorado has also recognized the importance of providing the field with guidance on how to compare the new standards with the assessment frameworks. Crosswalks were created between the assessment objectives and the new standards. Given that the new standards are more rigorous, these crosswalks provided a relatively easy way of demonstrating that as districts move to teaching the new standards, by default, in most cases, they will be covering the material reflected in the assessment frameworks.

In sum, Colorado has already committed fully to the implementation of a new, Common Core-aligned assessment system in the coming three years – whether this system is the result of an ambitious state effort or an ambitious national effort, the outcome will be the same. Through the state-of-the-art reporting tools on SchoolView, an innovative growth model that helps make the assessment data meaningful and useful to stakeholders, and a sustained strategic focus on the use of data for improvement at all levels of the system, Colorado is already ahead of the game and is well prepared for the task of implementation of the college-and career-ready standards and corresponding assessments that lies ahead. Such a system forms the cornerstone of a state accountability system that is capable of objectively evaluating the performance of schools and districts and determining whether progress is being made or not.
### 1.C DEVELOP AND ADMINISTER ANNUAL, STATEWIDE, ALIGNED, HIGH-QUALITY ASSESSMENTS THAT MEASURE STUDENT GROWTH

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
</tr>
</thead>
<tbody>
<tr>
<td>✗ The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</td>
<td>❌ The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</td>
<td>❌ The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</td>
</tr>
<tr>
<td>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</td>
<td>i. Provide the SEA’s plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments.</td>
<td>i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7)</td>
</tr>
</tbody>
</table>

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Colorado is participating in both of the State consortia that received grants under the Race to the Top Assessment competition. The Memoranda of Understanding under that competition are included in Attachment 6.

Colorado is also working to develop its own system, based on a statutory mandate passed prior to the formation of the assessment consortia. As noted in 1.B, Colorado is committed to having a college
readiness assessment system, and is considering multiple options for implementing such a system. If Colorado proceeds with its own system, the timeline for implementation is below:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Timeline</th>
<th>Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder input</td>
<td>Fall 2009 – Fall 2010</td>
<td>X</td>
</tr>
<tr>
<td>Adoption of assessment system attributes by State Board of Education and Colorado Board of Higher Education</td>
<td>Fall 2010</td>
<td>X</td>
</tr>
<tr>
<td>Develop cost estimates</td>
<td>Spring - Summer 2011</td>
<td>X</td>
</tr>
<tr>
<td>RFP release</td>
<td>January 2012</td>
<td></td>
</tr>
<tr>
<td>RFP review</td>
<td>Winter 2012</td>
<td></td>
</tr>
<tr>
<td>Contract award</td>
<td>March 2012</td>
<td></td>
</tr>
<tr>
<td>Item Development (Key characteristics: multiple item types assessing the breadth and depth of standards, transition to on-line, leverage advantages of technology,)</td>
<td>Beginning in Spring 2012</td>
<td></td>
</tr>
<tr>
<td>Field testing</td>
<td>Spring 2013</td>
<td></td>
</tr>
<tr>
<td>Ongoing item development</td>
<td>Ongoing</td>
<td></td>
</tr>
<tr>
<td>First operational administration</td>
<td>Spring 2014</td>
<td></td>
</tr>
<tr>
<td>Standard setting (Key characteristics: must be tied to indicators of college- and career- readiness)</td>
<td>Late spring-early summer 2014</td>
<td></td>
</tr>
<tr>
<td>Release of scores</td>
<td>Summer 2014</td>
<td></td>
</tr>
</tbody>
</table>
PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA’s differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA’s plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA’s differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

COLORADO’S GUIDING PRINCIPLES

From a foundation of ambitious college- and career-ready expectations for all students, implemented through rigorous standards and assessments and expectations for teachers and building leaders, Colorado is poised to deliver an effective differentiated accountability, support and recognition system. The state’s accountability system, already in its second year of full implementation, was designed to drive continuous improvements in student achievement and to account for individual student growth and proficiency in assessing school, district and state performance. With a successful ESEA flexibility application, the Colorado Department of Education (CDE) will be able to build upon current alignment efforts to create a single, rigorous, comprehensive accountability system that aligns state and federal determinations, interventions and resources, and differentiates support to the schools and districts in greatest need.

Colorado’s accountability system creates focus by drawing a single bright line: all students need to be college- and career-ready by the time they leave Colorado’s K-12 system. As a part of the Colorado Achievement Plan for Kids (CAP4K) and in conjunction with the Colorado Department of Higher Education and the public, CDE has defined college- and career-readiness as the knowledge, skills and behaviors essential for high school graduates to be prepared to enter college and the workforce and to compete in the global economy. In June 2009, the Colorado State Board of Education and the Colorado Commission on Higher Education developed a postsecondary and workforce readiness description. This description includes: (1) content knowledge in literacy, mathematics, science, social studies, and the arts and humanities, and (2) learning and behavior skills that include critical thinking and problem-solving; the ability to find and use information, especially through information technology; creativity and innovation; global and cultural awareness; civic responsibility; work ethic; personal responsibility; communication; and collaboration. For a complete description, please see Appendix 1 or follow this link: http://www.cde.state.co.us/cdegen/downloads/PWRdescription.pdf.
As shown in Principle 1 of this document, Colorado is on a clear path towards aligning its standards and assessments with this bright line. Colorado’s accountability system includes rigorous performance levels that hold all schools to college- and career-ready standards. The performance levels apply not only for the general population, but for historically disadvantaged subgroups as well. Colorado is proposing an accountability system that effectively melds achievement status, disaggregation, growth, and postsecondary readiness measures.

The results from a rigorous growth model such as Colorado’s provide useful data that go well beyond what achievement status percentages can communicate – they give individual measures of student progress. Through intensive data analysis, CDE has concluded that a meaningful way to measure a school or district’s effectiveness in preparing students for college- and career-readiness is by measuring students’ growth to proficiency standard. Absolute levels of student performance as measured by “achievement status” percentages tell a part of the story necessary for evaluating a school or district’s effectiveness, but the other part of the story relies on a measurement of student academic growth. When status measures alone are considered, the system cannot be used to easily identify schools in which proficiency is currently meeting expectations, but where students are not learning enough to maintain that proficiency. Likewise, schools with low achievement can be identified as failures even when their students show remarkable growth that will most likely lead to proficiency at a later date. It is critical that an accountability system distinguish not just the schools and districts that are furthest from the bright line of college- and career-readiness for all students, but that the system also distinguishes among the schools and districts making the most progress in moving their students toward college- and career-readiness. Colorado’s performance frameworks reflect these important distinctions among schools through use of the Colorado Growth Model and differentiated performance levels.

The Colorado Growth Model produces information about growth to standard, using both norm- and criterion-referenced data, allowing the state to measure how well schools and districts are moving students towards college- and career-readiness. First, the norm-referenced information provides a consistent context in which to understand performance because it describes how a student, a disaggregated student group, or a school or district is doing relative to others. Reporting of the median student growth percentiles distinguishes between an elementary school whose typical student is growing at the 10th percentile of his/her academic peers and an elementary school whose typical student is growing at the 80th percentile of his/her academic peers. This normative information is useful in its own right, but it is not enough. The criterion-referenced data from the Colorado Growth Model places normative progress in a meaningful context, quantifying what growth was needed for those students to, on average, be reaching or maintaining proficiency within a reasonable period of time. The model does this by matching the normative data with the state’s achievement level cut scores, which have remained the same for a number of years. In this way, someone can understand both the normative level of growth (how much above or below average it might have been) as well as what outcomes that level of growth is likely to lead to.

Colorado places great value on growth to a standard, as it is a strong indicator of whether a school or district is effective in moving students towards college- and career-readiness. By including growth in the state’s accountability system, Colorado can meaningfully distinguish between schools and districts that
have high levels of student achievement but who are making limited growth, and schools and districts that have low levels of student achievement but who are making high growth. Although the state’s accountability tools use both types of performance (achievement and growth, and normative and criterion-referenced growth), the emphasis is on growth to proficiency standard because it provides the most relevant information as to a school or a district’s effectiveness, and consequently directs the state’s support and interventions.

Finally, Colorado’s system creates fairness by protecting all students. To close achievement gaps and increase equity, our state is concerned with improving educational outcomes not just for some students, or for the majority of students, but for all students. Compared to AYP accountability, almost 600,000 additional students are included in Colorado’s accountability system. Colorado’s accountability system not only maintains but advances a focus on equity. Along with reporting all available growth and achievement data at the specific NCLB disaggregated group level in SchoolView, the state’s accountability measure includes a growth gaps indicator that disaggregates growth by minority status, poverty, disability, limited English proficiency, and by students scoring below proficient. This creates incentives for schools, districts and the state to look carefully at the growth that disaggregated groups of students are making relative to their academic peers, as well as if they are making the criterion-referenced growth they need to be college-and career-ready. Without higher growth rates, students that start out behind will never catch up. The additional disaggregation of the growth of students needing to catch up – those students below proficient on the prior year’s assessment – further ensures that Colorado’s accountability system highlights the growth of any students who are not on track to college- and career-readiness, regardless of their association with a specific student group. Graduation rate data is also disaggregated within the accountability framework.

OVERVIEW OF COLORADO’S SYSTEM OF ACCOUNTABILITY, SUPPORT AND RECOGNITION

In August 2010, Colorado launched its new, comprehensive system of accountability, support and recognition for schools and districts, designed to ensure that all students graduate from the Colorado K-12 school system college- and career-ready. Built upon the state’s Education Accountability Act of 2009 (SB-163), the years of implementing NCLB accountability and support systems, an innovative and meaningful growth model, and a dynamic data reporting platform, this new system creates a performance management system focused on continuous improvement at all levels. Although only in its second year of full implementation, Colorado’s accountability system has sparked meaningful conversations regarding school and district performance and sharpened the focus on improvement efforts.

Colorado’s accountability system applies to all schools and districts (see Figure 3 below). Schools and districts are sorted based on their performance in the School and District Performance Frameworks. The differentiated performance types, represented in the second column, indicate which schools and districts need the most attention and intervention. After receiving performance data, all schools and districts analyze and respond to the data through the Unified Improvement Plan process in order to determine the specific actions needed to raise student achievement. For those in the lowest levels of
performance, Turnaround and Priority Improvement, an in-depth review of their plan is conducted and detailed feedback is provided. In alignment with the necessary action steps identified in their UIP, schools and districts can access supports from the state. A tiered system of support includes universal supports for all, as well as targeted and intensive supports and interventions for the lowest performing schools and districts. These supports are based on the identified needs in struggling schools and districts and the research on effective systems, designed to leverage the greatest gains in student learning.

Specific consequences apply to Priority Improvement and Turnaround schools and districts as well. Turnaround schools and districts must implement a Turnaround Option upon identification. Title I Priority Improvement and Turnaround schools must offer choice and supplemental education services to families. To ensure that students are not attending persistently underperforming schools, no school or district may remain in Turnaround or Priority Improvement status for more than five consecutive years, per state legislation. Finally, all of the performance data, achievement data, staff information, and the UIPs themselves are reported through our dynamic, interactive SchoolView system, which provides transparent performance information.

Figure 3. Overview of Colorado’s Single, Comprehensive Accountability System.

<table>
<thead>
<tr>
<th>SPF Plan Type</th>
<th>UIP</th>
<th>UIP Review</th>
<th>Supports</th>
<th>Consequences</th>
<th>Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performance</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improvement</td>
<td></td>
<td>All schools complete this process</td>
<td>Universal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Priority Improvement</td>
<td>CDE and State Review Plan provide feedback (approval for “focus” schools)</td>
<td>Title I struggling schools</td>
<td>Targeted and Intensive Supports: SIG and “focus” prioritized</td>
<td>SES Choice (Title I only)</td>
<td>Five Year Clock</td>
</tr>
<tr>
<td>Turnaround</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Continuous improvement is necessary at all levels, including statewide, in order for this system to be effective. CDE annually analyzes the results of the performance frameworks and looks for ways to improve upon them through the inclusion of other measures, better calculation methods, inclusion of more students, and meaningful disaggregation of the data wherever possible. SchoolView is regularly enhanced and updated to further enable inquiry. The State continues to work to more explicitly define
the legislation and consequences for identification, while building out the support provided to the schools and districts identified in greatest need. Through continuous evaluation and stakeholder input, CDE will annually strengthen the process of identifying performance challenges, planning for improvement, and implementing action steps with supports, enabling the state to increase student learning and student achievement throughout the state with the goal of college- and career- readiness for all.

Colorado believes our state system creates a more rigorous, comprehensive approach to accountability and support than previously existed with NCLB alone. As table 3 outlines, Colorado’s single, comprehensive accountability system meets the requirements of and exceeds the expectations in NCLB Title IA accountability regulations. More students are included because accountability applies to all schools and not just Title I schools, a higher bar is set, and greater expectations for continuous improvement are expected of all schools. Additionally, support and interventions will now be directed towards all of the truly lowest performing schools.

Table 3. Comparison between NCLB Accountability and Colorado’ Proposed System.

<table>
<thead>
<tr>
<th></th>
<th>NCLB</th>
<th>Colorado’s, single, comprehensive accountability system</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Purpose</strong></td>
<td>• To ensure that all students attain basic proficiency in reading and math and meet graduation rate targets by a specific date.</td>
<td>• To ensure that every student graduates from K-12 education college- and career- ready.</td>
</tr>
</tbody>
</table>
| **Students Included for accountability** | • 220,140 students (27% of all students)  
• 157,998 students in poverty (48% of students in poverty) | • 811,867 students  
• 327,932 students in poverty |
| **Schools Included in Accountability Consequences** | • 660 schools (35% of schools) | • 1899 schools |
| Measure of college- and career-readiness | • Partially proficient, proficient, and advanced | • Proficient and advanced |
| • Reading, Math and Graduation Rates | • Growth to Standard (Adequate Growth) |
| | • Reading, Math, Writing, Science, English language proficiency, ACT, graduation and dropout rates |

| School and District Performance Indicators | • Participation |
| | • Academic Achievement (AMOs) |
| | • Partially Proficient and Above | • Proficient and Above |
| | • Measures of progress |
| | • Safe Harbor | • Academic Growth to Standard (normative and criterion referenced growth) |
| | • Matched Safe Harbor | • Academic Growth Gaps (Academic Growth to Standard by disaggregated group) |
| | (in Title III AMAOs, not AYP) | • Academic Growth in English Language Proficiency |
| | • Postsecondary Workforce Readiness- 4, 5, and 6 year graduation rates | • 7-year graduation rates |
| | | • Dropout rates |
| | | • Composite ACT score |
### Disaggregation of Achievement Results by Student Groups

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>52,390 minority students included</strong></td>
<td><strong>152,563 minority students included</strong></td>
<td></td>
</tr>
<tr>
<td><strong>All indicators</strong></td>
<td><strong>Academic Growth Gap Indicator and Graduation Rate Indicator</strong></td>
<td></td>
</tr>
<tr>
<td><strong>English language learners, Students with Disabilities, Economically Disadvantaged students</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Race/ethnicity categories</strong></td>
<td><strong>Minority</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Catch-up Students (growth for non-proficient students)</strong></td>
<td></td>
</tr>
</tbody>
</table>

### AMOs and Determinations

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Targets increase every three years.</strong></td>
<td><strong>Targets/cut-points normed based on 2009-10 data; are reviewed annually and increased over time.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Targets step-up to 100% proficiency (Partially Proficient or higher) by 2014</strong></td>
<td><strong>Growth targets are based on students on track to proficient (proficient and advanced) within three years or by 10th grade.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Yes or No for each disaggregated indicator</strong></td>
<td><strong>Points (1-4) assigned for each sub-indicator</strong></td>
<td></td>
</tr>
<tr>
<td><strong>If there are any &quot;No&quot; determinations, then AYP is not met.</strong></td>
<td><strong>Points are aggregated by indicator and overall</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Schools and districts either make AYP or not.</strong></td>
<td><strong>Schools are assigned 4 different plan types. Districts are given one of five accreditation levels.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Data are also reported by percent of targets met, by Reading, Math and Graduation Rate</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Improvement Planning Requirements
- Only Title I schools on Improvement
- All schools in the state, regardless of performance

### Supports available
- Only for Title I schools
  - missed many of the lowest performing schools
  - over-identified others
- All of the lowest performing schools

### Public Reporting
- Limited requirements-achievement, HQ, etc.
- In addition, includes growth, growth to standard, dropout, equitable distribution of teachers, etc.

Before addressing the specific questions in the rest of the application, the next section provides an orientation to the Colorado Growth Model, the School and District Performance Frameworks and SchoolView as these are the key foundations for our waiver request.

## THE COLORADO GROWTH MODEL

Absolute levels of student performance – “achievement status” percentages – provide a “snapshot” of current performance, but they do not provide an indication of where a school is headed. Because achievement only tells part of the story necessary for an evaluation of system effectiveness, a solid measurement of student academic progress across all levels of achievement is needed. Colorado has developed and implemented an innovative growth model designed to do this. This combination of growth calculations and an accompanying reporting system allows users to focus on the specific level of the system that is pertinent to their line of inquiry - from the individual student (“We know that this student is already proficient in Reading, but is he making further progress?”) to a student group (“Are the American Indian students in this school making enough progress in Writing to be proficient by the time they move on to high school?”) to the whole state (“Are the state’s English Learners in metro areas making as much growth as those in rural areas?”)

With multiple years of the State’s data, the growth model accumulates a general understanding of the likelihood of patterns of performance. This translates into an ability to consider hypothetical scenarios, such as: “A student scoring x, y and z in grades 3, 4 and 5 in reading would like to reach the level of Advanced by grade 8 in 2014. How much growth would she need to achieve for this to happen? Answer: nth percentile, sustained over each of the next three years.” These are not predictions per se; they are calculations that flow from positing one piece of the scenario and requesting model output for the other. In Colorado, this aspirational level of individual student growth is referred to as adequate growth percentiles (AGP), or growth to a proficiency criterion.

Aspirational growth related to particular criterion levels of performance is reported to Colorado schools and districts along with the rest of the growth information for each of their students. Districts have
found the AGPs to be useful in helping to set individual goals for students, especially those far behind in terms of proficiency. Looking at this growth-to-a-standard measure serves as a reality check on how much effort will be required to get a student to proficiency within three years or by exit. If exceptional levels of growth are required, then an exceptional intervention is called for. When this fact becomes widely understood by all stakeholders, an opportunity is created to marshal a consensus for change.

Colorado has pioneered this use of growth models and accordingly needed to investigate the validity of AGPs, to determine whether calculating them offers any advantage over not doing so. Using two cohorts of historical data for each content area, a simple prior proficiency achievement status model predicted that students already scoring at the proficient level in a given content area would continue to do so through the final year of the data, while those scoring below proficient would not attain proficiency within the timeframe. Those predictions were checked against what actually happened to get a sense of the accuracy of the base rate prediction — the percentage of the predicted outcomes that actually came true several years later. In an AGP-based prediction model, on the other hand, the prediction uses the statistical power of the Colorado Growth Model to look at score history and growth for each student in order to estimate whether or not a student is on track to catch up (starting out below proficient) or keep up (staying proficient). The AGP-based predictions were also compared against actual data (what really happened to those students) to arrive at a percentage of correct predictions. A summary of the correct predictions for each model is included in the Table 4, below.

Table 4. Correct Predictions of Proficiency Level using Prior Achievement versus Adequate Growth Calculations

<table>
<thead>
<tr>
<th></th>
<th>Percentage of correct predictions (prior proficiency level only)</th>
<th>Percentage of correct predictions (AGPs)</th>
<th>Improvement in percentage of correct predictions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Math</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Below proficient</td>
<td>77.7</td>
<td>88.6</td>
<td>10.9</td>
</tr>
<tr>
<td>Proficient</td>
<td>58.2</td>
<td>75.5</td>
<td>17.2</td>
</tr>
<tr>
<td>Reading</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Below proficient</td>
<td>55.8</td>
<td>76.2</td>
<td>20.5</td>
</tr>
<tr>
<td>Proficient</td>
<td>78.1</td>
<td>82.6</td>
<td>4.4</td>
</tr>
<tr>
<td>Writing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Below proficient</td>
<td>56.4</td>
<td>78.8</td>
<td>22.4</td>
</tr>
<tr>
<td>Proficient</td>
<td>68.7</td>
<td>78.7</td>
<td>9.9</td>
</tr>
</tbody>
</table>

Using the simple prior proficiency model gives moderately good predictions in several cases. For example, predicting that a below-proficient student will remain below proficient in math is accurate 77.7 percent of the time. However, AGP-based predictions are better in all cases. The improvement in the
percentage of correct predictions is impressive, and provides evidence of the validity and usefulness of the AGPs. Most importantly, the results suggest that the AGPs are most useful at discerning which students are beating the odds and catching up, because the improvements in correct predictions are highest for the Below Proficient rows. This is directly attributable to the power of the Colorado Growth Model and its extension to AGPs. The percentages of correct predictions are unlikely to approach 100 even under the best of circumstances because of the large number of situations affecting a student’s life and schooling in the years subsequent to the growth calculation made by the state. Indeed, these levels of prediction are quite remarkable by themselves, showing how useful the growth data can be.

These growth-to-standard calculations are essentially a hybrid statistic, with both growth and proficiency components represented. Schools with large numbers of students scoring below proficient have a difficult task facing them, because these students must grow more than already-proficient students – they need to catch up. In this way, schools that have large numbers of students needing to catch up face a stark reality that is quantified by the AGP calculations. No matter how high the observed normative growth in these schools, the amount of growth necessary for these students to achieve proficiency is calculated and reported, and that number can be high enough to represent a significant challenge. These AGPs are calculated at the individual level, but are aggregated in the same way as student growth percentiles, by the creation of a median that represents the central tendency. Median AGPs tell what level of growth was needed for all students, so that, on average, they would be reaching or maintaining proficiency within a reasonable timeframe.

Also fundamental to Colorado’s approach is the recognition that in order to close persistent achievement gaps, observed growth needs to be significantly higher for historically disadvantaged groups. Achievement gaps are the end result of multiple years of lower growth for impacted students; therefore, growth will be a leading indicator of when gaps are closing. Colorado’s accountability system looks specifically at the growth of disaggregated groups to assess whether or not it is sufficient to get these students to college- and career-readiness in time.

Additional information has been to submit to the U.S. Department of Education around the Colorado Growth Model in Appendix 10.

**SCHOOL AND DISTRICT PERFORMANCE FRAMEWORKS**

**Overview**

To focus attention on what matters most, the Education Accountability Act of 2009 (SB-163) requires the state to align conflicting accountability systems into a single system that holds all schools and districts accountable to a common framework. The state has acted upon this mandate by developing annual reports known as the School and District Performance Framework (SPF and DPF) reports (see Appendix 7 for an annotated report). The SPF and DPF reports provide a body of evidence on each school’s and district’s attainment on the four key performance indicators that most impact the system’s ability to ensure college- and career-readiness for all students: Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. The state defines measures and metrics for each of these performance indicators, and a school’s or district’s
demonstrated outcomes are combined to arrive at an overall evaluation of a school’s or district’s performance. These evaluations are made annually, with the state providing both School and District Performance Framework reports to schools and districts at the start of each school year (by August 15) and publishing them on SchoolView for the public in the fall of each school year (by December).

For schools, the overall evaluation determines the type of improvement plan they must implement. Schools are assigned one of four plan types: Performance Plan, Improvement Plan, Priority Improvement Plan, or Turnaround Plan.

For districts, the overall evaluation determines their accreditation designation. Districts are assigned to one of five accreditation designations: Accredited with Distinction, Accredited, Accredited with Improvement Plan, Accredited with Priority Improvement Plan, or Accredited with Turnaround Plan.

These determinations are the trigger for a differentiated system of recognition, accountability and support. The lowest-performers, those on a Priority Improvement or Turnaround Plan, have required interventions and receive the greatest attention from the SEA, including targeted state supports. Those on Distinction are rewarded, and the majority, those schools or districts on Performance or Improvement Plan, receive universal supports from the state.

Given this intent, Colorado set a baseline for the distribution of schools and districts in each category. In the first year of releasing the performance frameworks (August 2010), 65.9% of schools received a Performance plan assignment, 20.8% an Improvement plan, 8.3% a Priority Improvement plan, and 5.1% a Turnaround plan assignment. With a small proportion of schools and districts in the lowest two categories, the state is able to direct accountability and support efforts where they are most needed. This baseline also allows the state to benchmark its performance and to track progress from year to year in the shifts of the distribution. For the second year, the cut-points for each category remained the same as the prior year, but the numbers of schools and districts in Priority Improvement and Turnaround decreased slightly. These shifts are examined annually, and the State Board, in particular, is charged with annually reaffirming or adopting targets. When significant shifts in the system are observed, the bar for all schools and districts will be raised.

Performance Indicators

To arrive at an overall evaluation of a school or district’s performance, the School and District Performance Frameworks individually evaluate a school or district’s performance on each of the performance indicators of Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. Each performance indicator evaluation is based on multiple state-defined measures and metrics. Based on performance relative to minimum state expectations (targets), schools/districts receive one of four ratings: exceeds, meets, approaching or does not meet. These are described below, with a summary in Table 5 and specific AMOs/performance targets/cut-points in Principle 2B and Appendix 4. For additional detail, see: http://www.cde.state.co.us/Accountability/PerformanceFrameworks.asp or http://www.cde.state.co.us/media/training/SPF_Online_Tutorial/player.html for an online tutorial.
## Table 5. Colorado’s School Performance Framework Report

<table>
<thead>
<tr>
<th>Performance Indicator</th>
<th>Achievement</th>
<th>Growth</th>
<th>Growth Gaps</th>
<th>Postsecondary and Workforce Readiness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Points/Weight</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elementary/Middle</td>
<td>25 points</td>
<td>50</td>
<td>25 points</td>
<td>35 points</td>
</tr>
<tr>
<td>High School</td>
<td>15 points</td>
<td>35</td>
<td>15 points</td>
<td></td>
</tr>
<tr>
<td>Measure</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colorado Student</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assessment Program</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(CSAP), including:</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Lectura and Escritura</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Spanish versions of reading &amp; writing for grades 3, 4)</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>CSAP-A (alternate CSAP)</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>In the following content areas:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reading (25%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mathematics (25%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Writing (25%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Science (25%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colorado Growth</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Model CSAP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reading (28.6%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Mathematics (28.6%)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>• Writing (28.6%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colorado English</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Language Acquisition</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proficiency Assessment (CELapro) (14.3%)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Metric</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Median Student Growth</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentile (MGP)</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Normative growth relative to academic peers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adequate Student</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Growth Percentile (AGP)</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Criterion-referenced growth relative to standard (proficiency)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>For the following disaggregated student groups:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Free/Reduced Lunch Eligible</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Minority Students</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Students w/Disabilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• English Learners</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Students needing to catch up (below proficient in prior year)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Median Student Growth</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentile (MGP)</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Normative growth relative to academic peers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adequate Student</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Growth Percentile (AGP)</td>
<td>% of students proficient/ advanced</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Criterion-referenced growth relative to standard (proficiency)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Graduation rate</td>
<td>Graduation rate (25%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disaggregated</td>
<td>Disaggregated graduation rate (25%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Graduation rate</td>
<td>Dropout rate (25%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dropout rate</td>
<td>Colorado ACT (25%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Colorado ACT</td>
<td>Colorado ACT composite score</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Academic Achievement**
The Achievement indicator on the School and District Performance Framework reports reflect how a school/district’s students are doing at meeting the state’s proficiency goal: the percentage of students proficient or advanced on Colorado’s standardized assessments. (Note that for AYP purposes, Colorado is approved to use partially proficient, proficient and advanced scores. The state system raises the bar to only include proficient and advanced). Academic Achievement indicators include results from CSAP (reading, math and writing given in grades 3-10; science given in grades 5, 8, 10), CSAPA (the alternate CSAP given to students with the most significant cognitive disabilities), and CSAP Lectura/Escritura (the Spanish versions of the reading and writing CSAP, for which English Language Learners in grades 3 and 4 may be eligible). This data, including disaggregations by race/ethnicity, disability, English proficiency, disability, poverty, migrant and gifted/talented status, grade, and gender, are all reported in SchoolView. Specific AMOs are provided in Principle 2B.

**Academic Growth to Standard**
The Academic Growth to Standard indicator measures academic progress using the Colorado Growth Model. This indicator reflects two aspects of growth: 1) median normative growth—how the academic progress of the students in a school/district compare to that of other students statewide with a similar CSAP score history in that subject area, and (2) adequate growth—whether this level of growth was sufficient for the typical student in a school/district to reach an achievement level of proficient or advanced on the CSAP within three years or by 10th grade, whichever comes first.

The framework sets minimum expectations for the Academic Growth to Standard indicator in reading, math and writing for each school level based on the interplay of median and adequate growth. (Because science is not assessed annually in each grade, annual growth percentiles are not available.) As a result of the ESEA flexibility waiver and continuing improvements to the frameworks, Colorado also plans to include median and adequate growth percentiles for the Colorado English Language Proficiency Assessment (CELApro) as an additional content area for the Academic Growth to Standard indicator.

The state recognizes that students start from varying achievement levels and that the most successful schools and districts make the greatest gains in moving a student from his/her starting point. However, growth to a standard is also imperative. The state’s mission is to ensure that all students exit Colorado’s K-12 system prepared for college- and career- success – not all students except for those who start behind. As a result, the Education Accountability Act requires that adequacy of growth is a factor in a school’s or district’s growth rating. The Growth indicator evaluates growth through the normative measure using median growth percentiles, but also through the criterion-referenced adequate growth percentiles. To be adequate, schools’ or districts’ MGPs must meet or exceed their median AGP. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.
**Academic Growth Gaps**
The Academic Growth Gaps indicator measures the academic growth to standard of historically disadvantaged disaggregated student groups and students needing to catch up. It disaggregates the Growth Indicator into student subgroups, and reflects their median and adequate growth using the same criteria as Academic Growth to Standard. The subgroups include minority students, students eligible for Free/Reduced Lunch, English Learners, students with disabilities (IEP status), and students needing to catch up (students who scored Unsatisfactory or Partially Proficient in the prior year). Colorado added accountability for Academic Growth to Standard for students needing to catch-up, as these are the key students on whom the system, especially the Title I system, needs to focus.

The framework sets minimum expectations for the Growth Gaps indicator in the same way as in the Growth indicator. The framework evaluates where each subgroup’s median growth percentile falls into the decision tree/scoring guide above and assigns points to each accordingly. By disaggregating for the median and adequate growth of historically disadvantaged student groups, the School and District Performance Frameworks hold schools/districts accountable for the growth of all students, not only growth relative to their academic peers and where they started, but also to the standard of proficiency and college- and career-readiness. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.

**Postsecondary and Workforce Readiness**
The Postsecondary and Workforce Readiness Indicator measures the preparedness of students for college or careers upon exiting Colorado’s K-12 school system. This indicator reflects student graduation rates, dropout rates, and Colorado ACT composite scores. In Colorado, all 11th grade students take the ACT assessment. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.

**Scoring: Arriving at an Overall Performance Indicator Rating, School Plan Type and Accreditation Designation**
Based on the individual ratings of does not meet, approaching, meets and exceeds for each measure within each indicator, schools and districts receive an overall rating for each of the four key performance indicators of Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. Details on these calculations are provided in the appendix.

The percent of points earned on all of the indicators are then combined to arrive at an overall school plan type or district accreditation designation. Each performance indicator is weighted differently; the percent of indicator points earned translate into a weighted percent of points earned. These weights, shown in Table 5, reflect Colorado’s values. The Education Accountability Act requires that the state performance frameworks give the greatest weight to Academic Growth to Standard and Postsecondary and Workforce Readiness. Although all of the performance indicators provide evidence of a school/district’s success in preparing students for college- and career-readiness, growth is the leading indicator of progress towards this and postsecondary and workforce measures most closely reflect actual preparedness.
Finally, the weighted percent of points earned sum up to an overall percent of framework points earned. Appendix 4 shows the cut-points needed to earn a final school plan type or district accreditation designation on the School and District Performance Framework reports.

**School and District Performance Framework Resources and Results**

For more information on Colorado’s School and District Performance Framework, including technical specifications, see the School Performance Framework Technical Guide [www.schoolview.org/documents/SPFTechnicalGuide.pdf](http://www.schoolview.org/documents/SPFTechnicalGuide.pdf). For a guided online tutorial, see: [www.cde.state.co.us/media/training/SPF_Online_Tutorial/player.html](http://www.cde.state.co.us/media/training/SPF_Online_Tutorial/player.html).

To access public School and District Performance Framework reports, go to: [www.schoolview.org/performance.asp](http://www.schoolview.org/performance.asp). Reports are available for 2009-10, with reports for 2010-11 to be publicly released in December 2011. Additionally, an annotated report is provided in Appendix 7.

**PUBLIC REPORTING THROUGH SCHOOLVIEW**

Colorado’s approach to education data is to report all available data in a way that makes the information transparent, understandable, accessible, and, above all, useful. Usefulness is an important standard because improvement is the objective, not just exploration or understanding. In order to do this, Colorado created and registered a national trademark for a website ([www.schoolview.org](http://www.schoolview.org)) where public users can access the most important education-related state data in a quick and easy fashion.
SchoolView houses the award-winning Colorado Growth Model application, as well as a suite of other tools that puts all the information at a user’s fingertips (School Performance, Learning Center and Community Connections). Colorado has been at the forefront of the effort to use a growth model and a particular set of visual displays to generate understanding and interest around its student growth and achievement calculations. CDE provides both in-person and online professional development so that school and district educators can develop understanding of the data and their underlying meaning. Student growth as calculated by the state in its tested areas has not just been accepted by Colorado’s schools and districts, but has been embraced and brought into many pertinent conversations and decisions. Frequent use of growth data by groups working in districts and schools has been documented by the state, demonstrating the numerous appropriate uses these groups have been able to put the data up against.

The Public Growth Model index allows users to select districts or schools of their choice and compare the results of their status and growth in reading, writing, and math over the last four years, in an easy-to-read visual.
This public reporting is only a part of all that SchoolView makes available. Through the Student-Level Data Access in the Colorado Growth Model, school and district users with authenticated access to student-level data can get other insights into their data through a variety of private reports, like the one shared in the Overview. Through the Colorado Growth Model, a user can drill down into a school’s public data to reveal the patterns of student growth and achievement, such as in this visual display of all 9th graders’ math scores, with those of a particular student highlighted.
Another click would enable this user to drill down into the student’s years of math data, so that the growth model comes alive with a longitudinal portrait of individual achievement and growth (pictured below). These displays and accompanying downloadable and printable pdf reports can become the center of a fruitful conversation about the different scenarios for a student’s college- and career-readiness between the student him/herself, a parent and a teacher.
However, SchoolView is not only about growth data. Through a thoughtful and transparent presentation of all available education-related data in SchoolView, the state aims to engage stakeholders and facilitate a purposeful and effective use of those data at all levels of the system. In the School Performance section of SchoolView, users can access all school and district School and District Performance Frameworks, as well as the specific Unified Improvement Plan (at the bottom of the screen shot below).

Colorado includes the most important indicators in the Performance Frameworks. However, different stakeholders have different interests. All available data should be accessible to the public. In Colorado, stakeholders have access to the information they most value for accountability and they are able to analyze this data and cite public reports. This kind of online data reporting is an integral part of the system Colorado has constructed. All groups of stakeholders can see public data relevant to their areas of interest. In order for the public to make meaning of the data, it must be readily accessible and
interpretable. With SchoolView, all data are publically available and can be disaggregated in myriad, user-specified ways, giving on-demand public data reporting with eight years of consistently comparable data.

As of 2010, in response to annual public reporting requirements in the Education Accountability Act, SchoolView also houses the SchoolView Data Center application, pictured below. The Data Center serves as the primary application through which the public can access information about Colorado's public education system at the state, district and school levels. It provides easy access to data on federal and state accountability results, academic performance, and student and school demographics. The screen shot below shows the CSAP 2011 reading results for Economically Disadvantaged, English learners, students with disabilities, migrant and gifted and talented students. The trend data is listed in the table below.

Using the Data Center application, users can focus on a particular school or district and explore a variety of data from the past three years. The platform allows users to navigate through tabs such as profile (school/district contact info), performance (assessment results), students (enrollment and safety), and staff (teacher quality and equity). Of particular importance to this waiver application is the accountability tab, where users can see a school’s plan type or district accreditation rating, a school or district’s improvement status on the federal system, or pull up a school or district’s improvement plan. The fact that a school’s achievement gaps or a district’s accreditation rating are so easily obtainable by
the media, parents and other stakeholders reflects Colorado’s efforts to build transparency into the system. It also creates a strong incentive for school and district leaders to improve performance knowing that all results are publicly reported.

Through the transparency of the Performance Frameworks, Unified Improvement Plans and data accessible in SchoolView, Colorado has created a system where the performance of the state, districts and schools is both the basis and focus for the education work in the state.

**ADDITIONAL ACCOUNTABILITY INCLUDED IN THE DISTRICT PERFORMANCE FRAMEWORKS**

**TITLE IIA**

Colorado has found the Title IIA accountability provisions under 2141(c) to be extremely helpful in assisting those districts with the greatest staffing needs to better leverage Title IIA funds. However, the 2141(c) identification process does not adequately identify the districts with the greatest needs, as we have outgrown the highly qualified and AYP targets. As of the 2010-11 school year, 99.06% of classes in Colorado were taught by highly qualified teachers. Increasingly, the state’s focus on “educator effectiveness” is shifting from examining educator qualifications to focusing on educator evaluation as part of SB 10-191 (see Principle 3). Furthermore, AYP targets are extremely challenging and do not fully align with the state’s system for identifying districts (as described by the performance frameworks above). Colorado proposes to keep the financial and planning requirements associated with 2141(c) in place, but to re-define how districts are identified under this provision. Specifically, the state would like to transition the measures to match the evolving accountability system. Accordingly, districts identified under 2141(c) will be those districts identified for Priority Improvement or Turnaround for three consecutive years under the state accountability system, regardless of highly qualified teacher data.

By changing how districts are identified for Title IIA accountability, Title IIA can align its work with state efforts. Colorado believes that if a district performs in the bottom 15%, it is highly probable that its human capital systems would benefit from a closer examination. The newly defined 2141(c) accountability would continue to give the state the leverage to work with those districts to identify human capital needs and align Title IIA resources accordingly. This negotiation will continue to be documented through the state’s Unified Improvement Planning process.

Additionally, CDE will integrate the equitable distribution of teachers (EDT) requirements into the UIP process. Currently, all districts are required to conduct an EDT analysis and action plan, and provide an annual update to CDE. These plans will be folded into the Unified Improvement plan and process, thus reducing the reporting burden on districts (Principle 4). Colorado has investigated the best way to identify districts with Equitable Distribution gaps during the transition period to teacher effectiveness data. While highly qualified teacher data shows very little variability, CDE has detected equity gaps based on teacher experience. While experience alone does not determine a teacher’s effectiveness, when teacher experience data is paired with a school’s Academic Growth to Standard rating, the state has a better sense of how experience is impacting the school’s achievement. Thus, CDE has identified districts with Equitable Distribution Gaps based on schools with high poverty/minority populations, high
percentages of novice teachers and schools with the lowest Academic Growth to Standard ratings. Each district’s EDT can be seen on the staff tab of SchoolView. Colorado Springs District 11’s equitable distribution report from SchoolView is displayed below.

While CDE is not proposing to use the EDT directly in the identification of 2141(c) districts, the state will raise expectations for the use of that analysis in the improvement planning process and use of Title IIA funds. In other words, districts on Priority Improvement and Turnaround must include elements of their EDT analysis in their overall data analysis in the UIP. Based on their EDT analysis, CDE would expect specific action steps and use of Title IIA dollars to be reflected in the action plans. Through the district’s UIP, a clear plan to address any relevant staffing and staffing distribution issues will be presented. CDE staff will carefully review the analysis and proposed plans and funding to ensure Title IIA funds are leveraged in the most effective manner.
Colorado schools have more than 110,500 English Learners (13.28% of the state’s K-12 population based on 2009-10 Student October data). In order to ensure that schools are able to prepare all students for college- and career-readiness, the state needs to ensure our English learners are gaining English proficiency, as well as academic content knowledge. It is not enough to measure this solely through separate Title III accountability measures. Thus, Colorado is adding measures of English language progress and attainment to the state performance frameworks for schools and districts.

Specifically, Colorado’s Performance Frameworks include the following indicators focused on English learners:

1. **Academic Growth to Standard on Colorado’s English language proficiency assessment (CELApro).**

   This includes the Growth Percentiles for all students with two consecutive CELApro overall scores. The Student Growth Percentile provides a number (1-99) of the relative growth the student made compared to other students with a similar language attainment history as measured by CELApro. The Median Growth Percentile (MGP) is calculated by finding the median of all the school/district’s student growth percentiles. The median of the individual student growth percentiles provides a measure of the relative effectiveness of the school/district in teaching English to English language learners.

   Additionally, CDE calculates an Adequate Growth Percentile (AGP) for each student with a CELApro score. The CELApro calculates performance levels 1 through 5, where 1 is the lowest level of English proficiency and 5 is considered fully English proficient. The AGP is the growth percentile needed to get the student to English proficiency (level 5) within the set timeline. AGP is calculated as follows:

<table>
<thead>
<tr>
<th>Current Proficiency Level</th>
<th>Desired Proficiency Level</th>
<th>Time Line to Reach Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2</td>
<td>1 year</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td>1 year</td>
</tr>
<tr>
<td>3</td>
<td>4</td>
<td>2 years</td>
</tr>
<tr>
<td>4</td>
<td>5</td>
<td>2 years</td>
</tr>
</tbody>
</table>
For example, the aspirational growth goal for a student at Proficiency level 1 is to reach Proficiency Level 2 in one year. CDE calculates the student growth percentile needed to move that student’s scale score in level 1 to the cut-point of level 2, based on the student’s score history on the CELApro. The growth percentile needed is the student’s AGP. AGP is calculated for all students within a school/district based on the goals in the table above. Instead of a single proficiency level goal set for three years out, CELApro AGPs are based on interim proficiency levels. Due to technical aspects of the growth model and the fact that English language acquisition, based on the CELApro levels, is not linear, it made more sense to include interim AGP targets.

Finally a Median Adequate Growth Percentile is calculated for the school/district, following the same decision rules as for Academic Growth to Standard in Reading, Writing, and Math when assigning points for Academic Growth to Standard on CELApro.

2. The Academic Growth Gaps Indicator captures the Academic Growth to Standard ratings in Reading, Writing and Math for English Learners.

3. The Postsecondary Workforce Readiness Indicator includes Graduation Rate targets for English Learners.

CDE requests an additional waiver to redefine Annual Measurable Achievement Objectives (section 3122 of NCLB) to ensure a true single, comprehensive accountability system for Colorado. Specifically, AMAOs will be re-defined as follows:

- **AMAO 1** - progress in English language proficiency to be defined by the Median Growth Percentile on CELApro (1).
- **AMAO 2** - attaining English language proficiency to be defined by the Adequate Growth Percentile (2).
- **AMAO 3** would be measured through the Academic Growth to Standard ratings in Reading, Writing and Math for English learners, as well as the Graduation Rate rating.

Districts with ratings of **does not meet** on the CELApro Academic Growth to Standard indicator would be considered to have not met AMAO 1 and 2. Districts with **does not meet** ratings for English learners in reading, writing and math Academic Growth to Standard indicators, and graduation rate indicators, would be considered to have not met AMAO 3.

By changing how AMAOs are defined for Title IIIA accountability, the program can align its work with State efforts. If data for English learners is embedded into a single accountability system, then the performance of English learners becomes a central focus, not the afterthought it often becomes when AMAOs are run separately. With over 13% of Colorado students learning English, it is imperative that the system includes performance indicators for English language proficiency and content proficiency for English language learners.
2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.</td>
<td>☑ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must:</td>
</tr>
<tr>
<td></td>
<td>a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and</td>
</tr>
<tr>
<td></td>
<td>b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.</td>
</tr>
</tbody>
</table>

2.A.ii. a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed;

In addition to reading and math, four other assessments contribute to Colorado’s comprehensive performance frameworks. The percentage of students in the “all students” group that performed at the proficient level on the 2011 assessments (the most recent administration), are provided for all grades assessed, below (2.A.ii.a). Also included are the Median Growth Percentiles and Adequate Growth Percentiles, when applicable.

Writing

Results from the state writing assessments administered in grades 3-10 are included in three indicators in the performance frameworks. Writing constitutes 25% of the Academic Achievement indicator, 28.5% of the Academic Growth to Standard indicator and 33% of the Academic Growth Gaps indicator calculations. The state’s alternate assessment (CSAPA) and the third and fourth grade Spanish version (Escritura) are used only in Academic Achievement, as the state does not calculate growth on the alternate assessment.
Table 6. Writing Performance

<table>
<thead>
<tr>
<th>Grade</th>
<th>Percent Proficient or Advanced on CSAP Writing 2011</th>
<th>Percent Developing or Novice on CSAPA Writing 2011</th>
<th>Percent Proficient or Above on Escritura 2011</th>
<th>Median Growth Percentile 2011</th>
<th>Adequate Growth Percentile 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>51.30%</td>
<td>27.91%</td>
<td>62.04%</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>4</td>
<td>55.73%</td>
<td>28.94%</td>
<td>28.80%</td>
<td>50</td>
<td>35</td>
</tr>
<tr>
<td>5</td>
<td>60.28%</td>
<td>39.68%</td>
<td>NA</td>
<td>50</td>
<td>38</td>
</tr>
<tr>
<td>6</td>
<td>61.91%</td>
<td>41.10%</td>
<td>NA</td>
<td>50</td>
<td>42</td>
</tr>
<tr>
<td>7</td>
<td>59.06%</td>
<td>38.29%</td>
<td>NA</td>
<td>50</td>
<td>47</td>
</tr>
<tr>
<td>8</td>
<td>54.26%</td>
<td>33.40%</td>
<td>NA</td>
<td>50</td>
<td>48</td>
</tr>
<tr>
<td>9</td>
<td>52.63%</td>
<td>30.11%</td>
<td>NA</td>
<td>50</td>
<td>45</td>
</tr>
<tr>
<td>10</td>
<td>46.89%</td>
<td>26.15%</td>
<td>NA</td>
<td>50</td>
<td>49</td>
</tr>
</tbody>
</table>

Science
Results from the science assessment results (CSAP and CSAPA), administered in grades 5, 8 and 10, are included in the Academic Achievement indicator calculation. Colorado does not calculate growth on science because it is not given in consecutive grades. Science data contributes to 25% of the Academic Achievement indicator.

Table 7. Science Performance

<table>
<thead>
<tr>
<th>Grade</th>
<th>Percent Proficient or Advanced on CSAP Science 2011</th>
<th>Percent Developing or Novice on CSAPA Science 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>46.69%</td>
<td>44.22%</td>
</tr>
<tr>
<td>8</td>
<td>49.43%</td>
<td>50.37%</td>
</tr>
<tr>
<td>10</td>
<td>47.46%</td>
<td>30.55%</td>
</tr>
</tbody>
</table>

As approved in Colorado’s Accountability Workbook for Title I, proficiency is currently defined as Partially Proficient, Proficient and Advanced. The state has determined that in a comprehensive state accountability system focused on college- and career- readiness, it is important to only include proficient or advanced scores. Thus, the data presented above does not align with data submitted through EDFacts and the Consolidated State Performance Report.

CELapro
Results from the Colorado English Language Proficiency Assessment (CELapro) (administered in grades K-12) is included in the Academic Growth to Standard indicator calculation. CELapro Growth data contributes to 14% of the Academic Growth to Standard rating.
Table 8. CELApro Performance

<table>
<thead>
<tr>
<th>Grade</th>
<th>Percent Level 1 2011</th>
<th>Percent Level 2 2011</th>
<th>Percent Level 3 2011</th>
<th>Percent Level 4 2011</th>
<th>Percent Level 5 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>K</td>
<td>36.4%</td>
<td>45.5%</td>
<td>12.6%</td>
<td>5.4%</td>
<td>.2%</td>
</tr>
<tr>
<td>1</td>
<td>13.6%</td>
<td>16.2%</td>
<td>37.2%</td>
<td>30.2%</td>
<td>2.8%</td>
</tr>
<tr>
<td>2</td>
<td>5.8%</td>
<td>15.7%</td>
<td>27.4%</td>
<td>47.2%</td>
<td>3.9%</td>
</tr>
<tr>
<td>3</td>
<td>5.7%</td>
<td>13.1%</td>
<td>26.2%</td>
<td>45.8%</td>
<td>9.3%</td>
</tr>
<tr>
<td>4</td>
<td>4.3%</td>
<td>8.7%</td>
<td>27.2%</td>
<td>48.3%</td>
<td>11.5%</td>
</tr>
<tr>
<td>5</td>
<td>3.5%</td>
<td>5.3%</td>
<td>21.2%</td>
<td>52.4%</td>
<td>17.6%</td>
</tr>
<tr>
<td>6</td>
<td>3.4%</td>
<td>5.3%</td>
<td>25.4%</td>
<td>52.1%</td>
<td>13.7%</td>
</tr>
<tr>
<td>7</td>
<td>4.0%</td>
<td>4.4%</td>
<td>21.8%</td>
<td>53.0%</td>
<td>16.7%</td>
</tr>
<tr>
<td>8</td>
<td>4.2%</td>
<td>5.1%</td>
<td>18.1%</td>
<td>50.3%</td>
<td>22.4%</td>
</tr>
<tr>
<td>9</td>
<td>7.3%</td>
<td>9.1%</td>
<td>35.4%</td>
<td>41.2%</td>
<td>6.9%</td>
</tr>
<tr>
<td>10</td>
<td>8.2%</td>
<td>8.7%</td>
<td>29.2%</td>
<td>43.6%</td>
<td>10.3%</td>
</tr>
<tr>
<td>11</td>
<td>7.9%</td>
<td>10.0%</td>
<td>27.3%</td>
<td>43.7%</td>
<td>11.2%</td>
</tr>
<tr>
<td>12</td>
<td>9.1%</td>
<td>10.7%</td>
<td>26.4%</td>
<td>42.1%</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

As CELApro is not used as a status measure, CDE uses the median growth percentile compared to the median adequate growth percentile for the Academic Growth to Standard rating. The table below displays, by grade, CELApro median growth percentiles and adequate growth percentiles. By nature of the growth model, the state median growth percentiles will be right about 50.

Table 9. CELApro Growth

<table>
<thead>
<tr>
<th>Grade</th>
<th>CELApro Median Growth Percentile 2011</th>
<th>CELApro Adequate Growth Percentile 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>50</td>
<td>19</td>
</tr>
<tr>
<td>2</td>
<td>51</td>
<td>45</td>
</tr>
<tr>
<td>3</td>
<td>51</td>
<td>54</td>
</tr>
<tr>
<td>4</td>
<td>51</td>
<td>39</td>
</tr>
<tr>
<td>5</td>
<td>52</td>
<td>51</td>
</tr>
<tr>
<td>6</td>
<td>52</td>
<td>57</td>
</tr>
<tr>
<td>7</td>
<td>52</td>
<td>44</td>
</tr>
<tr>
<td>8</td>
<td>53</td>
<td>62</td>
</tr>
<tr>
<td>9</td>
<td>53</td>
<td>76</td>
</tr>
<tr>
<td>10</td>
<td>52</td>
<td>59</td>
</tr>
<tr>
<td>11</td>
<td>52</td>
<td>60</td>
</tr>
<tr>
<td>12</td>
<td>51</td>
<td>76</td>
</tr>
</tbody>
</table>
ACT
The Postsecondary and Workforce Readiness indicator includes Colorado ACT composite scores. ACT results contribute to 33% of the Postsecondary Workforce Readiness indicator.

Table 10. ACT Scores.

<table>
<thead>
<tr>
<th>Grade</th>
<th>Colorado ACT Composite Score 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>19.452</td>
</tr>
</tbody>
</table>

All of the indicators included in the Performance Indicators are directly related to college- and career-readiness. Reading, writing, math and science proficiency assessments all measure the content needed for success in college- and career- and are weighted in an equal manner. English language proficiency is directly related to a student’s success in the U.S. postsecondary system or workforce, but does not apply to all students, and thus is weighted half of the weight of content assessments. Finally, ACT scores are a third of the Postsecondary Workforce Readiness indicator, as they directly measure students’ college readiness.

2.A.ii. b include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

As writing, math, English language proficiency and ACT results are key skills needed for students to be college- and career-ready, their inclusion in the accountability system strengthens the State’s ability to determine the effectiveness of schools and districts at preparing students.
Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</td>
</tr>
<tr>
<td>Option B</td>
<td>Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.</td>
</tr>
<tr>
<td></td>
<td>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</td>
</tr>
<tr>
<td>Option C</td>
<td>Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.</td>
</tr>
<tr>
<td></td>
<td>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</td>
</tr>
<tr>
<td></td>
<td>ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.</td>
</tr>
<tr>
<td></td>
<td>iii. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)</td>
</tr>
</tbody>
</table>
2.B.i. Provide the new AMOs and an explanation of the method used to set these AMOs.

Setting Ambitious but Attainable AMOs
The effectiveness of Colorado’s recognition, accountability and support system depends in large part on AMOs that are both ambitious and attainable. The AMOs must be ambitious to ensure that the system reflects our highest aspirations for getting all students college- and career-ready, yet they must also be attainable so that schools and districts find them to be meaningful and useful goals that guide improvement efforts.

The Colorado Department of Education will build upon the cut-points in the school and district performance frameworks and create annual AMOs for proficiency. The 2011-12 AMOs will be the current requirements for earning a meets rating in the academic achievement section of the framework, on the one-year School Performance Frameworks (see Appendix 4 for the cut-points in the all the SPF measures). The meets cut-point is set at the proficiency rate (percent of students proficient or above) of the 50th percentile of schools in 2010. These cut-points are set separately for reading, math, writing and science, and at the elementary, middle and high school level. The goal will be for all schools to earn an exceeds rating, by meeting the cut-point for exceeds. The exceeds cut-points are set at the proficiency rate (percent of students proficient or above) of the 90th percentile of schools in 2010. The exceeds cut-point, at the 90th percentile of schools provided a meaningful, yet ambitious target for schools to work towards. Schools strive to improve their performance as measured by the frameworks. The performance of the 90th percentile of schools is an ambitious goal. In order to reach this goal, interim targets have been set annually from 2011-12 until 2015-16, with equal incremental increases for each year. The increments needed are ambitious goals, but are possible with extremely focused efforts. The charts below show the specific AMOs for each content area and grade level. AMOs will not vary based on district, school or disaggregated group, requiring schools and groups further behind to make greater gains. Please note that Colorado may need to re-visit the AMOs when the new assessment system is implemented, depending on the extent to which achievement results differ from those on the current assessment system.

<p>| Table 11. AMOs for the percent of students proficient and advanced 2011-12 through 2015-16. |
|---------------------------------------------|----------------|--------|--------|--------|--------|--------|</p>
<table>
<thead>
<tr>
<th>Content</th>
<th>Level</th>
<th>2011-12 (meets cut-point)</th>
<th>2012-13</th>
<th>2013-14</th>
<th>2014-15</th>
<th>2015-16 (exceeds cut-point)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>Elementary</td>
<td>71.5%</td>
<td>74.7%</td>
<td>77.9%</td>
<td>81.2%</td>
<td>84.4%</td>
</tr>
<tr>
<td></td>
<td>Middle</td>
<td>70.5%</td>
<td>73.8%</td>
<td>77.1%</td>
<td>80.3%</td>
<td>83.6%</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>71.5%</td>
<td>74.8%</td>
<td>78.2%</td>
<td>81.5%</td>
<td>84.8%</td>
</tr>
<tr>
<td>Writing</td>
<td>Elementary</td>
<td>54.7%</td>
<td>58.5%</td>
<td>62.2%</td>
<td>65.9%</td>
<td>69.7%</td>
</tr>
<tr>
<td></td>
<td>Middle</td>
<td>56.4%</td>
<td>60.4%</td>
<td>64.4%</td>
<td>68.3%</td>
<td>72.3%</td>
</tr>
</tbody>
</table>
Colorado publicly reports both status achievement and growth achievement for all disaggregated groups through SchoolView.org. In conversations with the U.S. Department of Education, we have been told that publicly reporting the data would meet the requirements. Currently, the race/ethnicity CSAP and CSAPA status data is reported in SchoolView.org as shown in Figure 4.

<table>
<thead>
<tr>
<th></th>
<th>High</th>
<th>48.6%</th>
<th>53.4%</th>
<th>58.1%</th>
<th>62.9%</th>
<th>67.6%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Math</td>
<td>Elementary</td>
<td>70.5%</td>
<td>74.0%</td>
<td>77.6%</td>
<td>81.1%</td>
<td>84.6%</td>
</tr>
<tr>
<td></td>
<td>Middle</td>
<td>50.0%</td>
<td>54.7%</td>
<td>59.4%</td>
<td>64.1%</td>
<td>68.8%</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>32.2%</td>
<td>37.2%</td>
<td>42.3%</td>
<td>47.1%</td>
<td>52.1%</td>
</tr>
<tr>
<td>Science</td>
<td>Elementary</td>
<td>48.0%</td>
<td>53.4%</td>
<td>58.9%</td>
<td>64.3%</td>
<td>69.7%</td>
</tr>
<tr>
<td></td>
<td>Middle</td>
<td>45.6%</td>
<td>51.5%</td>
<td>57.4%</td>
<td>63.2%</td>
<td>69.1%</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>48.9%</td>
<td>54.3%</td>
<td>59.7%</td>
<td>65.0%</td>
<td>70.4%</td>
</tr>
</tbody>
</table>

The data can also be viewed by individual proficiency level, by grade, gender, English learner, migrant, economically disadvantaged, gifted and talented, and students with disabilities.

The AMOs will be reported in SchoolView.org alongside the status data. Every year, horizontal lines will be drawn across at the meets and exceeds cut-points, as well as the current year’s AMO (see Figure 5). Users will easily be able to see if a school or disaggregated group has met the AMO or not. Additionally,
the data table included in SchoolView.org will include information on whether or not the AMO was met (see Figure 6).

![Figure 5](image_url)

**Figure 5.** Proposed reporting for proficiency data compared to AMOs in chart form.

<table>
<thead>
<tr>
<th>Name</th>
<th>Subject</th>
<th>Ethnicity</th>
<th>2010</th>
<th>2011</th>
<th>2012</th>
<th>Met 2011-12 AMO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adams 12</td>
<td>Reading</td>
<td>American Indian</td>
<td>55.19%</td>
<td>48.37%</td>
<td>52.94%</td>
<td>No</td>
</tr>
<tr>
<td>Adams 12</td>
<td>Reading</td>
<td>Asian</td>
<td>74.08%</td>
<td>72.96%</td>
<td>73.96%</td>
<td>Yes</td>
</tr>
<tr>
<td>Adams 12</td>
<td>Reading</td>
<td>Black</td>
<td>58.37%</td>
<td>52.75%</td>
<td>57.97%</td>
<td>No</td>
</tr>
<tr>
<td>Adams 12</td>
<td>Reading</td>
<td>Hispanic</td>
<td>47.32%</td>
<td>46.29%</td>
<td>47.10%</td>
<td>No</td>
</tr>
<tr>
<td>Adams 12</td>
<td>Reading</td>
<td>White</td>
<td>73.02%</td>
<td>65.92%</td>
<td>72.94%</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Figure 6.** Proposed reporting for proficiency data compared to AMOs in table form.
ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.

The rationale for each of the specific AMOs is described in detail in 2.B.i. Overall, the AMOs are meant to strike a balance between being ambitious and being attainable, while a meaningful part of the performance frameworks. The *meets* and *exceeds* cut-points were set in consultation with schools, districts and other stakeholders, particularly Colorado’s SB-163 Superintendents Advisory Council and the Technical Advisory Panel, both panels comprised of field staff.

Ambitious and attainable performance targets are achieved through Colorado’s school and district performance framework reports by setting minimum state expectations at the *meets* cut-point, then setting higher expectations at the *exceeds* cut-point. Having these tiered levels of performance allows Colorado to set AMOs that are stable. Stability within the cut-points is critical so that schools and districts know what they are aiming for, and can monitor progress towards higher levels. The AMOs provide a map for schools to achieve higher levels of performance. The AMOs increase from 3 to 5 percentage points a year, a stretch for schools, but definitely attainable. The AMOs provide added incentives for schools and districts to continuously improve.

iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?

Colorado does not set AMOs that vary by LEA, school or subgroup. We hold all students, subgroups, schools and districts accountable to the standard of college- and career-readiness. However, because some students, subgroups, schools and districts start further behind, getting to the standard will require greater rates of annual progress.

iv. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010-2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)

While all of the requested data is available at the SchoolView, we have also provided the high level data in Attachment 8, where you will find the academic achievement data for reading and math by grade and by disaggregated group. Also included is the academic growth data for reading and math reported by grade and disaggregated group.

The SchoolView Data Center can be accessed at www.schoolview.org/performance.asp by clicking on the “SchoolView Data Center” button. Once in the Data Center, navigate to the “Performance” tab. From here any member of the public can investigate the CSAP, CSAP (Spanish) and CSAPA data for the state. These data are available by specific content area (Reading, Math, Writing, and Science), disaggregated by grade, ethnicity, gender, or student group (economically disadvantaged, English
learner, students with disabilities, migrant or gifted and talented). Trend data are also provided. To get even more detailed information, use the drop down labeled “Overall” in the upper right corner and select “Detail.”

As approved in Colorado’s Accountability Workbook for Title I, proficiency is defined as Partially Proficient, Proficient and Advanced. The state has determined that in a comprehensive, single state accountability system focused on college- and career-readiness, it is important to include only proficient or advanced scores, thus holding itself accountable to a higher but more defensible standard. Thus, the data in the NCLB State Report Card and EDFacts files will not match what is presented below.
2.C REWARD SCHOOLS

2.C.i Describe the SEA’s methodology for identifying highest-performing and high-progress schools as reward schools.

CDE has traditionally recognized the most outstanding performers among Colorado schools. Currently, several state and federal award programs recognize schools with strong performance or sustained improvement in performance. The specific reward programs and the methodologies used to identify recipients are outlined below.

**Governor’s Distinguished Improvement Award- High-Progress**
These awards are granted to elementary, middle and high schools in the state that demonstrate the highest rates of sustained student longitudinal growth across multiple years. The intent of this award aligns with the USDE’s proposed “High-progress” reward. CDE will use the results from the 3-year School Performance Frameworks, specifically the Academic Growth to Standard and Academic Growth Gaps indicators, to determine eligibility. Schools must receive a rating of *exceeds* on the Academic Growth to Standard indicator and a rating of *meets or exceeds* on the Academic Growth Gaps Indicator. This latter condition ensures that only schools demonstrating the highest levels of growth across all student sub-groups are identified, in furtherance of aligning this award with USDE’s intent. Additionally, high schools must also have ratings of *meets or exceeds* on the Graduation Rate sub-indicator ratings to receive the Governor’s Distinguished Improvement Award. This ensures that all high schools identified have graduation rates above 80%. In 2011, 200 schools (approximately 10% of all schools in the state) will receive the Governor’s Distinguished Improvement award.

**John Irwin Schools of Excellence Award- High Performance**
These awards are granted to elementary, middle and high schools whose level of attainment on the student achievement performance indicators is within the top eight percent of all public schools in the state. This award closely parallels USDE’s proposed “high-performance” reward, and CDE will take steps to ensure further alignment. CDE will utilize the results from the 3-year School Performance Frameworks to determine qualifying schools. The selection criteria include a rating of *exceeds* on the Academic Achievement indicator, a rating of *meets or exceeds* on the Academic Growth Gaps indicator and for high schools a rating of *meets or exceeds* on the Graduation rate sub-indicator. Performance on the Growth Gaps indicator has been added to ensure adequate performance across all subgroups. CDE has also added the graduation requirement to closer align with USDE’s definition and ensure that recognized high schools are indeed exiting postsecondary and workforce ready individuals. In 2011, John Irwin Awards will be given to 199 schools (approximately 10% of all schools in the state.)

**Title I Distinguished Schools**
Each year, Colorado recognizes two Title I Schools for student achievement. Since the passage of NCLB, these awards have used AYP data for criteria. The Exemplary Achievement Award is presented to the school with the highest number of students who are partially proficient, proficient or advanced on aggregate CSAP scores for all grades served. The Closing the Achievement Gap Award is presented
to the school with the highest aggregate CSAP scores that has also significantly closed the gap between two identified groups of students (i.e., minority vs. non-minority.) However, upon approval of our single, comprehensive accountability system, the Exemplary Achievement Award will be selected from the highest Title I school in the John Irwin Schools of Excellence pool. The Closing the Achievement Gap Award will be based upon improvements in the Academic Growth Gaps indicator. These changes will be made to ensure that Title I awards and recognition are aligned with the comprehensive accountability measures.

**Centers of Excellence Award**
These awards are granted to the elementary, middle and high schools: (1) with at least a 75% at-risk population, and (2) demonstrating high rates of sustained student longitudinal growth across multiple years, measured by median student growth percentiles. Colorado’s definition for at risk includes students eligible for Free or Reduced-price meal programs and/or English language learners. CDE will rank eligible schools by the percent of points earned on the Academic growth indicator of the 3-year School Performance Framework, and then identify the highest performers. In 2010, 32 schools (approximately 10% of schools with at least 75% at-risk students) received Centers of Excellence awards.

**Blue Ribbon School**
Nominees for the Blue Ribbon award qualify as either (1) high performing –top 10% of schools in the state as measured by state tests in both reading and math, or (2) dramatically improved –40% of the student body is from disadvantaged background and the school has dramatically improved student performance in reading and math on state assessments. Colorado nominates 5 schools each year, 2 in the high-performing category, and 3 in the dramatically improved category. If our waiver request is approved, criteria will be directly aligned to the indicators in the performance frameworks.

**U.S. Department of Education Definitions**
In order to ensure alignment with the U.S. Department of Education criteria for Reward Schools, Colorado has identified two specific schools that meet the requirements above based on the results from the 2010-11 assessments. The language used in the waiver request to define the “highest-performing school” mirrors the requirements for National Title I Distinguished Schools. As a result, CDE is defining our “highest-performing school” as our National Title I Distinguished School for Exceptional Student Performance.

CDE identified Soaring Eagles Elementary for the 2011-12 National Title I Distinguished School for Exceptional Student Performance. In 2011, the percentage of students who were at or above the No Child Left Behind proficient level on the reading and math Colorado Student Assessment Program (CSAP) was 98 percent. Their high performance has been maintained for multiple years overall, and for all disaggregated groups. Additionally, the school has made AYP for the past two years for the school as a whole and all disaggregated groups. There are no significant achievement gaps within the school either. This school meets the U.S. Department of Education definition of a “highest-performing school.”
Mountain Valley Middle School in Saguache, Colorado has been identified as Colorado’s 2011-12 “high-progress” school. The school is a Title I school among the top ten percent of Title I schools in the state in improving the percent of students proficient and advanced on reading, writing, math and science assessments. The school is relatively small and does not have any reportable disaggregated groups except for white students. Over the past three years, the school has made significant progress, as shown in the table 12.

Table 12. Percent of proficient students at Mountain Valley Middle School 2009 to 2011.

<table>
<thead>
<tr>
<th>Percent of Students Proficient and Advanced</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Reading</td>
</tr>
<tr>
<td>Writing</td>
</tr>
<tr>
<td>Math</td>
</tr>
<tr>
<td>Science</td>
</tr>
</tbody>
</table>

As the science assessment is only given in 8th grade, there are not enough students to be able to report the science results. Mountain Valley Middle School meets the U.S. Department of Education’s definition of a “high-progress school”.

Future Methodology and Assurance

Annually, CDE will identify reward schools in following manner:

1. Identify Colorado’s reward schools including the: Governor’s Distinguished Improvement Award, John Irwin School of Excellence Award, Centers for Excellence Award, Blue Ribbon Schools, and the National Title I Distinguished School Awards.

2. From that list, the department will identify which of those schools meet the criteria for “highest-performing schools” and “high-progress schools” as defined by the U.S. Department of Education guidance.

For “highest-performing” schools, identification criteria will include schools that:

- Receive Title I funds;
- Earn an exceeds ratings on Academic Achievement (a rating of exceeds is greater than the current year AMO, up until 2015-16 when it equals the AMO);
- Have all disaggregated groups meeting or exceeding the current year AMO; and
- Earn a Graduation Rate indicator rating of exceeds for high schools.

For “high-progress” schools, identification criteria will include schools that:

- Receive Title I funds;
- Showed a change in the Academic Achievement rating from 3 years prior to the current year of:
  - does not meet to meets/exceeds, or
  - approaching to exceeds;
- Have all disaggregated groups meeting or exceeding the current year AMO; and
For high schools, have earned a change in the Graduation Rate indicator rating from 3 years prior to the current year of:

- does not meet to meets/exceeds, or
- approaching to exceeds.

For the 2012-13 school year (based on the 2011-12 data), and all years for which the waiver request is granted, CDE will conduct this data analysis and define a list of ESEA Waiver Reward Schools. Additionally, CDE will continue to identify schools for the Governor’s Distinguished Improvement Award, John Irwin School of Excellence Award, Centers for Excellence Award, Blue Ribbon Schools, and National Title I Distinguished School Awards.

2.C.ii Provide the SEA’s list of reward schools in Table 2.

The highest-performing and high-progress schools, identified as reward schools, are also noted in Attachment 9.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

High performing and high-progress schools are publically recognized and rewarded in a number of ways.

Under the Governor’s Distinguished Improvement, John Irwin, and Centers of Excellence award programs each recipient is issued a certificate and the award is announced in a press release and in CDE’s weekly newsletter, The Scoop. The recognition culminates in a media event that coincides with the release of the School and District Performance Framework reports. The 2010 event included congratulatory speeches from then-Colorado Governor Ritter and the CDE Commissioner and Associate Commissioner. Attendance at these events by students, teachers and school and district leaders, along with their positive feedback, serves as an important affirmation of their hard work.

For the Title I Distinguished School program, each designated school receives $10,000. A high-ranking CDE official makes the announcement at the school and provides a large cardboard check and an engraved statue to school leadership. This ceremony provides an excellent media opportunity at both local and state level. A press release is also issued.

The Legacy Foundation award honors a number of Colorado’s high-achieving, innovative schools, with a crystal apple, certificate and luncheon.

Finally, recipients of the Blue Ribbon School award are honored at a ceremony in Washington, D.C. each November.
2.D PRIORITY SCHOOLS

2.D.i Describe the SEA’s methodology for identifying a number of lowest-performing schools equal to at least five percent of the State’s Title I schools as priority schools.

Colorado proposes to identify these schools based on the following U.S. Department of Education criteria:

- a Title I-participating or Title I-eligible high school with a graduation rate less than 60 percent over a number of years; or
- a Tier I or Tier II school under the SIG program that is using SIG funds to implement a school intervention model.

Specifically, CDE used the following criteria described in Table 13 to identify the “priority” schools.

<table>
<thead>
<tr>
<th>Category of Priority Schools</th>
<th>Number of Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of Title I schools</td>
<td>661</td>
</tr>
<tr>
<td>Total number of priority schools required to be identified</td>
<td>33</td>
</tr>
<tr>
<td>Total number of schools that are currently-served Tier I or Tier II SIG schools</td>
<td>29</td>
</tr>
<tr>
<td>Title I or Title I eligible high schools with a graduation rate less than 60% over 3 years, that are rated as Turnaround or Priority Improvement</td>
<td>4</td>
</tr>
<tr>
<td>Total number of identified “priority” schools</td>
<td>33</td>
</tr>
</tbody>
</table>

Twenty nine schools are currently served with SIG and are implementing a reform model. An additional 4 schools were identified with high school graduation rates less than 60% for three consecutive years. These four schools are also identified as Turnaround or Priority Improvement through Colorado’s School Performance Frameworks.

2.D.ii Provide the SEA’s list of priority schools in Table 2.

   a. Did the SEA identify a number of priority schools equal to at least five percent of its Title I schools?

   Based on criteria b (i), (ii), and (iii) listed below, Colorado has 33 schools listed in Attachment 9 as Priority Schools.
b. Did the SEA’s methodology result in the identification of priority schools that are

(i) among the lowest five percent of Title I schools in the State based on the
achievement of the “all students” group in terms of proficiency on the
statewide assessments that are part of the SEA’s differentiated recognition,
accountability, and support system, combined, and have demonstrated a lack
of progress on those assessments over a number of years in the “all students”
group;

N/A

(ii) Title I-participating or Title I-eligible high schools with a graduation rate less
than 60 percent over a number of years; or

Colorado identified 4 additional high schools with graduation rates less than 60% (those
that received a does not meet rating on the Graduation Rates indicator).

(iii) Tier I or Tier II schools under the School Improvement Grants (SIG)
program that are using SIG funds to fully implement a school intervention
model?

Twenty nine schools that are recipients’ of the SIG funds were identified as priority
school in Attachment 9.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an
LEA with priority schools will implement.

As twenty nine of the priority schools are SIG schools, they will implement according to the SIG
turnaround principles. The additional four schools will also be required to implement the SIG program
and will receive support in the same manner.

Additional details concerning LEA and SEA responsibilities, support for English learners and students
with disabilities, and implementation monitoring are included below.

LEA responsibilities for supporting/intervening in “priority” schools
For the 29 “priority” schools identified based on SIG implementation, the LEA’s responsibilities for
supporting/intervening in the schools are thoroughly outlined and agreed to in 1.) SIG assurances, and
2.) the RFP and it’s review rubric. In order to ensure that the LEA is following through with these
responsibilities, the SEA looks for indicators during 3.) on-site implementation checks and 4.) monitoring
visits.

1. Assurances
The following assurances are included in the RFP, and pertain to the LEA’s responsibilities for supporting/intervening in the schools. In order to receive the SIG grant, districts must sign in agreement to the requirements below. The full document is posted here: http://www.cde.state.co.us/FedPrograms/ti/sitig.asp.

- To use its School Improvement Grant to implement fully and effectively an intervention in each Tier I and Tier II school that the LEA commits to serve consistent with the final requirements;
- To establish annual goals for student achievement on the state’s assessments in both reading/language arts and mathematics and measure progress on the leading indicators in section III of the final requirements in order to monitor each Tier I and Tier II school that it serves with school improvement funds;
- That if the applicant implements a restart model in a Tier I or Tier II school, it will include in its contract or agreement terms and provisions to hold the charter operator, charter management organization, or education management organization accountable for complying with the final requirements;
- To report to the Colorado Department of Education (CDE) the school-level data required under section III of the final requirements.
- To provide the Colorado Department of Education such information as may be required to determine if the grantee is making satisfactory progress toward achieving the goals of the grant (e.g., CSAP by State Assigned Student IDs, school level non-performance data). The district will report to CDE, at least quarterly, the school level formative and summative assessment data required under section III of the final requirements;
- To align current and future funding sources in support of improvement goals, including commitment to identify and reallocate existing district funds for the purpose of sustaining the improvement work after federal funds expire;
- To commit to developing a plan that demonstrates how the district will increase overall student achievement in the identified schools and share that plan with CDE;
- To commit to addressing the findings outlined in the external review.
- To provide the leadership capacity to oversee the implementation of turnaround interventions;
- To provide a district level contact whose primary responsibility is the oversight and coordination of turnaround interventions in the schools;
- To participate in quarterly Professional Learning Communities focused on turning around schools;
- To monitor and evaluate the impact of all turnaround interventions;
- To submit to CDE a UIP for each identified school updated as needed as a requirement for securing continued funding from year to year during the three-year term of this grant;
- To participate fully in on-site visits conducted by CDE to every funded Tier I, Tier II, or Tier III school during the grant cycle;

- Commit to engaging in significant mid-course corrections in the school if the data do not indicate attainment of or significant progress toward achievement benchmarks within the first
year of implementation, such as replacing key staff, leadership or external providers;

2. RFP/Review Rubric

In order to receive a SIG grant, reviewers will use the following criteria to evaluate the application. In order for the application to be recommended for funding, it must receive at least 95 of the total possible 143 points and all required parts must be addressed. An application that receives a score of 0 on any required parts within the narrative will not be funded. The table 14 includes the rubric concerning LEA Commitment and Capacity; the highlighted lines represent the indicators related to LEA responsibilities for supporting and intervening in priority schools. The full RFP document is posted here: www.cde.state.co.us/FedPrograms/ti/sitig.asp.

Table 14. Excerpt from SIG RFP and Review Rubric

<table>
<thead>
<tr>
<th>Part II: LEA Commitment and Capacity</th>
<th>Inadequate (information not provided)</th>
<th>Minimal (requires additional clarification)</th>
<th>Good (clear and complete)</th>
<th>Excellent (concise and thoroughly developed)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) What methods did the district use to consult with relevant stakeholders regarding the LEA’s application and implementation of school intervention models in its Tier I and/or Tier II schools (e.g., stakeholder meetings (PTA, teacher unions, school board), print/web-based communication, surveys)?</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>b) Detail how the community was given notice of intent to submit an application and how any waiver requests will be made available for public review after submission of the application (e.g., newspaper/news releases, posted on the school and/or district Web site).</td>
<td>0</td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>c) How is the district able to demonstrate readiness for the Tiered Intervention grant and what steps have been taken that demonstrate commitment to the specific requirements of this grant (e.g., TIG Diagnostic Review, school board commitment, previous staffing changes)?</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>d) What specific actions has the district taken or will the district take to design and implement interventions consistent with the final requirements?</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>e) Describe the specific actions the district has taken or will take to recruit, screen, and select external providers, if applicable, to ensure their quality (e.g., interviews, screening tools created)?</td>
<td>0</td>
<td>1</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Question</td>
<td>0</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>f)</td>
<td>What specific actions has the district taken or will the district take to align other resources with the proposed interventions (e.g., Title I, other state or federal grant funding)?</td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>g)</td>
<td>What specific actions has the district taken or will the district take to ensure flexibility, modify its practices, policies or oversight structures, outside of normal district constraints, if necessary, to enable its schools to implement the interventions fully and effectively (e.g., flexible scheduling, principal autonomy over staff hiring/firing and placement, budget autonomy, obtaining innovation school/zone status, teacher/union agreements)?</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>h)</td>
<td>Are there Tier I and/or Tier II schools in the district that will not be served through this grant? If so, please provide a detailed explanation for why the district lacks the capacity to serve them (e.g., lack of administrative or support staff to adequately support the implementation, improve academic achievement by focus on fewer schools).</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>i)</td>
<td>In the schools that are selected, how will the district demonstrate capacity to carry out the proposed interventions (e.g., leadership, detailed strategic or dissolution plans, capacity to administer and track progress monitoring assessments, capacity to engage in significant mid-course connections)?</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>j)</td>
<td>What specific actions has the district taken or will the district take to sustain the reforms after the funding period ends (e.g., professional development, trainer of trainer models, district commitment of continuation resources)?</td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>k)</td>
<td>How will the district measure progress toward the goals both formatively and summatively? Discuss how data will be disaggregated by subgroups on a regular basis (e.g., specific evaluation methods that are feasible and appropriate to the goals and objectives of the proposed project, data reports generated monthly and reviewed at both district and school levels, specific assessments administered on a specific assessment schedule).</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
</tbody>
</table>
I. Who will monitor and evaluate the progress of the program? Who will be responsible for sharing those results (leading indicators, quantitative indicators, student performance data) with CDE on a monthly basis (e.g., name of specific company or person with expertise noted)?

<table>
<thead>
<tr>
<th></th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reviewer Comments:

TOTAL POINTS __/52

3. Implementation checks

When the performance managers conduct their monthly onsite visits with the schools, at least one LEA staff member is involved in the visit. As noted in the assurances above, a district level contact whose primary responsibility is the oversight and coordination of turnaround interventions in the schools is identified through the RFP. This individual is involved with the site visits, along with any other LEA staff that are working with the school. As a result, the performance managers are able to gauge the level of involvement and support from the LEA. If there are concerns with the LEA’s involvement, the Performance Manager is able to address them.

Currently, the Performance Managers provide feedback through the Onsite Visit Feedback Form (see table 15). However, the Performance Managers are working on a more detailed implementation rubric to use on their site visits. The rubric will include indicators around the LEAs role in the process.

4. Monitoring indicators

CDE monitors districts and schools on the implementation of the SIG program. The Office of Federal Program Administration will be monitoring all cohort 1 and cohort 2 TIG schools in early 2012. This monitoring will be done with all SIG schools and their districts. The protocol for the monitoring will closely follow that used by the USDE, including the indicators released by the department and used in their monitoring of states. The Tracker system will help to track any indicators that require follow up. In the monitoring process, the questions included in Table 15 are asked about LEA responsibilities for supporting and ensuring the implementation of interventions in the SIG schools. (The full document is posted here: [http://www.cde.state.co.us/turnaround/downloads/SIG_Monitoring_Tool.pdf](http://www.cde.state.co.us/turnaround/downloads/SIG_Monitoring_Tool.pdf).)
<table>
<thead>
<tr>
<th>Guiding Questions</th>
<th>Acceptable evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has the LEA made any structural changes to support the implementation of the SIG intervention models?</td>
<td>LEA describes structural changes made, such as reassignment of duties, creation of turnaround offices, addition of staff. Current documentation that describes how the LEA is organized to support/implement SIG, such as organizational charts or job descriptions.</td>
</tr>
<tr>
<td>Has the LEA made any contractual changes or agreements with the labor union to ensure full and effective implementation of the intervention models (if applicable)?</td>
<td>LEA describes contractual changes or agreements, their relationship to SIG, and the timing of the changes. Copies of MOUs</td>
</tr>
<tr>
<td>How has the LEA addressed the following requirements: Recruited, screened, and selected external partners, if applicable, to ensure their quality? Modified its practices or policies, if necessary, to enable its schools to implement interventions fully and effectively?</td>
<td>Current documentation that describes the LEA’s process and criteria for approving external providers. Contracts/Agreements the LEA has entered into with external providers. LEA describes how it has modified its policies and practices.</td>
</tr>
<tr>
<td>Has the LEA established annual goals for student achievement on the State’s assessments in both reading/language arts and mathematics for each Tier I and Tier II school that it is serving?</td>
<td>LEA provides copies of LEA’s annual goals for student achievement on the State’s assessments in both reading/language arts and mathematics for each Tier I and Tier II school that it is serving. LEA provides any data it may have on progress toward those goals.</td>
</tr>
<tr>
<td>Did the district develop procedures and processes to screen school staff for hiring/rehiring?</td>
<td></td>
</tr>
<tr>
<td>Did the district develop procedures and processes to recruit, place, and retain staff with the necessary skills to implement the intervention model selected?</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Documentation</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Has the principal been given new authority with regard to the model implementation? For example, specifically relating to:</td>
<td></td>
</tr>
<tr>
<td>- Staffing?</td>
<td></td>
</tr>
<tr>
<td>- Calendars?</td>
<td></td>
</tr>
<tr>
<td>- Scheduling?</td>
<td></td>
</tr>
<tr>
<td>Has professional development been provided to support the implementation of school-reform strategies? For example, specifically</td>
<td>Documentation of professional development activities for the 2010-2011 school year</td>
</tr>
<tr>
<td>regarding implementing new instructional programs or strategies, analyzing data, or teaching LEP students?</td>
<td>LEA memorandum, announcements, or agendas for professional development meetings</td>
</tr>
<tr>
<td>Has the LEA implemented procedures and processes to recruit, place, and retain staff with the necessary skills to implement the</td>
<td>Professional Development resources and materials provided by LEA to SIG school staff relating to</td>
</tr>
<tr>
<td>intervention model selected?</td>
<td>the school reform models and effective instruction</td>
</tr>
<tr>
<td>Does the LEA have documentation for why it implemented the closure model?</td>
<td>Documentation, research, or data used to determine the types of professional development to be provided</td>
</tr>
<tr>
<td>Did the LEA ensure that students who previously attended the closed school enrolled in schools that are higher performing than the</td>
<td>Achievement data for the schools in which students are now enrolled</td>
</tr>
<tr>
<td>school which was closed with respect to student achievement data?</td>
<td></td>
</tr>
<tr>
<td>With regards to technical assistance, how has the LEA supported, schools in implementing the SIG program?</td>
<td>LEA describes any technical assistance it has provided to the schools, including the types, to</td>
</tr>
<tr>
<td></td>
<td>whom, and how often</td>
</tr>
<tr>
<td>Is the LEA ensuring that each SIG school is fully implementing the selected intervention model in the 2010 school year?</td>
<td>LEA describes its process for ensuring that schools are implementing in accordance with the final</td>
</tr>
<tr>
<td></td>
<td>requirements</td>
</tr>
</tbody>
</table>
Is the LEA ensuring that each SIG school is meeting the requirements of the school’s intervention model?

<table>
<thead>
<tr>
<th>Does the LEA have a way to collect and manage data on the leading indicators?</th>
<th>LEA describes the data it is collecting, its process for collecting the data, and its protocols for managing data on the leading indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the LEA using this data to inform its decision-making and reform efforts?</td>
<td></td>
</tr>
<tr>
<td>Is the LEA collecting any additional data beyond that required by the SEA and the SIG program?</td>
<td></td>
</tr>
<tr>
<td>Has the LEA begun collecting any benchmark or interim data on the leading indicators?</td>
<td>LEA provides copies of and explains any benchmark or interim data it has collected, if available</td>
</tr>
</tbody>
</table>

5. A submitted, reviewed and monitored Unified Improvement Plan

In addition to the above, “priority” schools will be required to annually develop and submit a Unified Improvement Plan, as is required of all schools in Colorado. The LEA must annually develop and adopt a Unified Improvement Plan that includes data analysis, the identification of root causes, improvement strategies to address those root causes, targets, and interim measures and implementation benchmarks to monitor progress. On at least a quarterly basis, the District Accountability Committee (DAC) and the School Accountability Committee (SAC), a body of community members appointed by the local school board, must “meet to discuss whether district/school leadership, personnel, and infrastructure are advancing or impeding implementation of the district’s/school’s performance, improvement, Priority Improvement, or Turnaround plan, whichever is applicable, or other progress pertinent to the district’s/public school’s accreditation contract” (1 CCR 301-1 12.02 (a)(4) and 1 CCR 301-1 12.04 (a)(4)).

All school plans require the LEA’s approval, taking into account the recommendations of the School Accountability Committee. The school principal and LEA superintendent (or a designee) are accountable for implementing performance and improvement plans; the local school board is accountable for implementing Priority Improvement and Turnaround plans (which may include delegating the responsibility to the principal and superintendent). The SEA also reviews and provides feedback regarding Priority Improvement and Turnaround plans, and may recommend modifications or assign the State Review Panel, an external group of education experts, to review the plan (a requirement for Turnaround plans). The criteria used by the SEA and the State Review Panel in reviewing Unified Improvement Plans is provided in the Appendix A. Furthermore, the assigned performance manager will have an explicit role in working with the school to continually implement their improvement plan and adjust it, as necessary.

The LEAs for the additional four schools that were identified as “priority” schools will be required to meet the same responsibilities as those with SIG schools.
Support for English Learners and Students with Disabilities

Within the Unified Improvement Plan

Colorado fully expects research-based improvement strategies to be described in the Unified Improvement Plan, and reviews Priority Improvement and Turnaround plans to ensure that the strategies included have a basis in research. Each plan must include the specific action steps the school will take to implement each of its identified improvement strategies with fidelity. Each action step must be associated with personnel, a timeline, and the resources a school will use.

In the development of improvement strategies, Colorado expects schools to identify interventions specific to their schools’ greatest performance challenges and the root causes of these challenges. For “priority” schools, where achievement is among the lowest in the state and has not progressed, the school would be expected to address this low performance. The schools are expected to disaggregate achievement results and identify the student groups that are the furthest behind or making the least progress. If English learners and students with disabilities are identified as the school’s focus, the expectation would be that the improvement strategies include interventions for these groups of students. The UIP quality criteria (see Appendix A) that form the basis of UIP reviews include review criteria for interventions for ELs and students with disabilities, as shown in the excerpt from the document in table 16. Program staff with expertise on ELs and students with disabilities are included in the UIP reviews of schools where performance among these groups is an issue, and provide targeted feedback to schools, specific to their context, of appropriate interventions and supports.

Table 16. Excerpt from the UIP Quality Criteria

<table>
<thead>
<tr>
<th>Required Element (definition)</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major Improvement Strategies</td>
<td>Describes an overall research-based approach based on a theory about how performance will improve. There must be evidence that the strategy has previously resulted in improvement in performance, such as that specified by a priority performance challenge.</td>
</tr>
<tr>
<td>An overall approach that describes a series of related actions intended to result in improvements in performance.</td>
<td>Describes the specific change in practice that will result from the action steps (e.g., not “improve reading instruction,” rather “implement formative assessment practices in all 3rd -10th grade classrooms during reading instruction”). Explicitly responds to the identified root cause(s). Specifically addresses the needed instructional improvements. Includes strategies associated with required district performance indicators (e.g., English language attainment, educator quality and high school completion rates).</td>
</tr>
</tbody>
</table>
Analyzing statewide trends, the State also surfaced that schools and districts sometimes struggled in adequately disaggregating data for special populations of students (e.g., students with disabilities, ELL students) and addressing their specific needs. A task force that included consultants representing those special populations was formed to take a deeper look at local needs and develop resources and strengthen trainings to support schools and districts as they refine their improvement plans. For example, the task force identified actual school and district improvement plans (including turnaround plans) that could serve as a model for other educators. Annotations to those plans, written by the task force, provided advice on ways to strengthen the plan. Particular attention was paid to highlighting areas where the needs of special populations of students could be lifted out and more adequately supported.

For SIG Schools

With the change in identification in “priority” schools, the SIG process ensures evidence-based interventions for ELs and students with disabilities at a more specific, and monitored level than through the UIP process alone.

The SIG Performance Manager works with the “priority” schools from the very beginning, starting with the data analysis process. Together, they identify any performance challenges in the school, including challenges for English learners and students with disabilities. Once the performance challenges are identified, then root causes are identified. As there are a wide range of reasons for performance challenges for groups of students, no one answer or intervention can be selected. The Performance Manager works with the school through the root cause identification process to identify the most direct and appropriate improvement strategy based on both the performance challenge and the root cause. When an appropriate improvement strategy is identified, then the Performance Manager will work to broker the needed resources and supports for the school. Through the monthly on-site visits (more details are included in the following section), the Performance Managers check for and support implementation of the improvement strategies.

For example, at a recent on-site visit in a SIG school, the focus of the data discussion and classroom observations was English Language Learners. Performance data for the particular disaggregated group was shared and discussed, as well as the targets set in the Unified Improvement Plan. Discussion and classroom observations then focused on the instruction and strategies being used to support English Language Learners, the professional development for staff, and coaching to embed the new strategies into everyday practice. Recommendations were given to the team about how to incorporate feedback into the walk-through and evaluation process.

Implementation checks

The U.S. Department of Education included a concern around “the reliance on the UIP process to generate interventions consistent with the turnaround principles without assurance or evidence that the interventions required to meet the turnaround principles will be implemented.” With the revision to the “priority” school definition to include the SIG schools and the 4 additional schools that will be treated as
SIG schools, CDE can address these concerns directly, as the process requires continuous implementation checks.

All SIG schools receive monthly visits from their Performance Managers. During the visit, the Performance Managers use the Onsite Visit Feedback Form (table 17) to provide feedback to building leadership. Through this process, CDE can assure that the interventions required to meet the turnaround principles are being implemented.

Table 17. Onsite Visit Feedback Form

<table>
<thead>
<tr>
<th>CULTURE/CLASSROOM ENVIRONMENT/TEACHER BELIEFS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Level of teacher efficacy</td>
<td>6. Student behaviors/discipline plan</td>
</tr>
<tr>
<td>2. Teacher belief system</td>
<td>7. What are you happy with?</td>
</tr>
<tr>
<td>3. Do teachers know the expectations/goals outlined in the UIP?</td>
<td>8. What needs improvement? What are you doing to monitor and analyze office referral data?</td>
</tr>
<tr>
<td>4. Teacher/student relationships</td>
<td></td>
</tr>
<tr>
<td>5. Classroom management</td>
<td>9. Speak to attendance rates</td>
</tr>
<tr>
<td></td>
<td>10. Speak to suspension rates</td>
</tr>
<tr>
<td>INSTRUCTION/PEDAGOGY/LEARNING ENVIRONMENT</td>
<td>WHAT TEACHER SUPPORTS ARE IN PLACE</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>1. What are the expectations around informal observations (#/teacher/month)?</td>
<td>1. PLCs</td>
</tr>
<tr>
<td>2. What are the established instructional/learning environment norms?</td>
<td>2. Collaboration amongst teams and vertical articulation?</td>
</tr>
<tr>
<td>a. After principal walk-throughs, principal sends out an email to staff stating “80% of classrooms had posted learning objectives; 65% of students could ‘state’ their learning objective”</td>
<td>3. Norms and protocols that drive these meetings?</td>
</tr>
<tr>
<td>3. How are you monitoring this? (tool)</td>
<td>4. What drives professional development?</td>
</tr>
<tr>
<td>a. What steps are in place?</td>
<td>5. Teachers observing teachers.</td>
</tr>
<tr>
<td>4. Are students engaged vs. compliant?</td>
<td>6. What are you happy with?</td>
</tr>
<tr>
<td>5. Are students able to articulate their learning goals/objectives?</td>
<td>7. What needs improvement?</td>
</tr>
<tr>
<td>6. RtI-</td>
<td></td>
</tr>
<tr>
<td>a. How does overall universal instruction look?</td>
<td></td>
</tr>
<tr>
<td>b. Speak to how the school utilizes the RtI model</td>
<td></td>
</tr>
<tr>
<td>7. What are you happy with?</td>
<td></td>
</tr>
<tr>
<td>8. What needs improvement?</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ASSESSMENT/DATA/INTERVENTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. What measures are in place to assess reading, writing, math, science?</td>
</tr>
<tr>
<td>2. How do you know student proficiency levels?</td>
</tr>
<tr>
<td>3. How are teachers using the data?</td>
</tr>
<tr>
<td>4. What efforts are in place to make adequate median growth for partially proficient and unsatisfactory students?</td>
</tr>
<tr>
<td>5. What are you happy with?</td>
</tr>
<tr>
<td>6. What needs improvement?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PARENT &amp; COMMUNITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. What efforts have been made to inform-involve parents in school improvement efforts?</td>
</tr>
<tr>
<td>2. How does this look different than last year?</td>
</tr>
<tr>
<td>3. What are you happy with?</td>
</tr>
<tr>
<td>4. What needs improvement?</td>
</tr>
<tr>
<td>TIG REFORM MODEL REQUIREMENTS</td>
</tr>
<tr>
<td>-------------------------------</td>
</tr>
<tr>
<td>1. What are you doing to revise the educator evaluation system to incorporate the use of student growth and data? How does your evaluation system align to the new state system?</td>
</tr>
<tr>
<td>2. What are you doing for extended learning time? Is it made available to all students? How does it align with the core instruction and courses during the regular school day?</td>
</tr>
<tr>
<td>3. How is school and district staff using data to drive change and improvement?</td>
</tr>
<tr>
<td>4. What are some examples of job-embedded professional development that have occurred or are planned for staff? How does it align to the Unified Improvement Plan?</td>
</tr>
<tr>
<td>5. How are you identifying and rewarding staff for accomplishments?</td>
</tr>
<tr>
<td>6. How are you incentivizing, recruiting and retaining effective educators?</td>
</tr>
<tr>
<td>7. What operational flexibility do you have to implement the requirements of this reform effort?</td>
</tr>
<tr>
<td>8. What social-emotional and community-oriented services are being provided to students and parents?</td>
</tr>
</tbody>
</table>

The additional four schools that were identified as “priority” schools will be required to implement a reform model from the SIG list and will receive the same implementation checks as the SIG schools.
2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA’s choice of timeline.

The currently served SIG schools (29) have already begun implementation of meaningful interventions aligned with the turnaround principles. Schools are required to implement the interventions for the entire length of the 3-year period. If awarded the 21st Century Community Learning Centers waiver, it would be possible to dedicate resources towards providing opportunities for expanded learning opportunities strategies to be implemented to a greater degree and with more flexibility in turnaround schools and districts. This would present a unique opportunity to leverage multiple federal funding streams to accomplish a unified education reform mission, a key goal of the ESEA Flexibility program.

At this point in time, the plan is to serve the following cohorts and schools, over the specified years, as shown in table 18.

Table 18. SIG cohorts served 2011-12 to 2014-15.

<table>
<thead>
<tr>
<th>Cohort</th>
<th>2011-12</th>
<th>2012-13</th>
<th>2013-14</th>
<th>2014-15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cohort 1 (20 schools)</td>
<td>Year 2 implementation</td>
<td>Year 3 implementation</td>
<td>Continued monitoring and support</td>
<td>Continued monitoring and support</td>
</tr>
<tr>
<td>Cohort 2 (9 schools)</td>
<td>Year 1 implementation</td>
<td>Year 2 implementation</td>
<td>Year 3 implementation</td>
<td>Continued monitoring and support</td>
</tr>
<tr>
<td>Additional “priority” schools (4 schools)</td>
<td>Year 1 implementation</td>
<td>Year 2 implementation</td>
<td>Year 3 implementation</td>
<td></td>
</tr>
<tr>
<td>Cohort 3 (funding for 12 additional schools)</td>
<td>Year 1 implementation</td>
<td>Year 2 implementation</td>
<td>Year 3 implementation</td>
<td></td>
</tr>
</tbody>
</table>

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Schools that have not received a school plan type assignment of Improvement or Performance for two consecutive years before ending their SIG grant will continue to be supported and monitored. Performance Managers will continue to work with the schools and LEAs on the implementation of their reform models. As shown in Appendix 4, a school must receive at least 47% of framework points to receive an Improvement rating. When results in Academic Achievement, Academic Growth to Standard, Academic Growth Gaps, and Postsecondary and Workforce Readiness (if applicable), are
combined and schools are able to earn at least 47% of their framework points, for two consecutive years, then they will exit priority status. While the performance of schools earning only 47% of points is not exemplary (not at Performance level), it is enough to no longer prioritize the State’s resources and interventions.

The additional four schools that were identified as “priority” schools will be held to the same exit criteria as the SIG schools.
2.E FOCUS SCHOOLS

2.E.i Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.”

Colorado proposes to identify “focus schools” schools based on the following U.S. Department of Education criteria. Specifically, Colorado identifies schools as “focus” schools using the following requirements:

- a school that has a subgroup or subgroups with low achievement or, at the high school level, low graduation rates, or
- Title I high schools with graduation rates less than 60 percent over a number of years and are not identified as a priority school.

Table 19 quantifies the number of schools identified in each category. Please note that schools already identified as “priority” are not included.

<table>
<thead>
<tr>
<th>Colorado Category of Focus Schools</th>
<th>Number of Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of Title I schools</td>
<td>661</td>
</tr>
<tr>
<td>Total number of focus schools required to be identified</td>
<td>66</td>
</tr>
<tr>
<td>Total number of Title I-participating high schools that have had a graduation rate less than 60 percent over a number of years and are not identified as priority schools</td>
<td>5</td>
</tr>
<tr>
<td>Total number of schools on the list generated based on a rating of Turnaround or Priority Improvement that have a subgroup or subgroups with low graduation rates (already identified as “priority” or above)</td>
<td>0</td>
</tr>
<tr>
<td>Total number of schools on the list generated based on a rating of Turnaround or Priority Improvement that have a subgroup or subgroups with low achievement</td>
<td>65</td>
</tr>
<tr>
<td>Total number of “focus” schools</td>
<td>70</td>
</tr>
</tbody>
</table>

Schools were identified as having low achievement for disaggregated groups by looking at disaggregated data for achievement. Specifically, we used the percent of students scoring proficient and advanced on the CSAP, just as in the School Performance Framework’s Academic Achievement indicator, disaggregated by minority, English learner, economically disadvantaged and students with disabilities, and assigned a rating to the performance of each group, using the same cut-points that are used in the Academic Achievement calculations. We used three years of data in order to ensure more schools were accountable for the performance of the most at-risk students. Title I schools with the lowest achievement for disaggregated groups of students, and also identified as Turnaround or Priority Improvement, were identified as “focus” schools.
2.E.ii  Provide the SEA’s list of focus schools in Table 2.

a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State's Title I schools?

   In Attachment 9, CDE has identified 70 schools as focus schools.

b. In identifying focus schools, was the SEA’s methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA’s differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?

   CDE identified schools based on three years of reading and math proficiency data for disaggregated groups of students. Additionally, high school graduation rate data, both overall and for disaggregated groups, was included.

c. Did the SEA’s methodology result in the identification of focus schools that have —

   (i) the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or

   (ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

   CDE focused upon definition (ii). We hold all subgroups to the same high proficiency targets and graduation rate expectation.

d. Did the SEA identify as focus schools all Title I-participating high schools with a graduation rate less than 60 percent over a number of years that are not identified as priority schools?

   Five Title I high schools were identified as “focus schools” as a result of graduation rate less than 60% for three years.
2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA’s focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

All of Colorado’s “focus” schools are also Turnaround or Priority Improvement schools under the state accountability system. First and foremost, the requirements of state law pertain to these schools. In order to ensure that identification as Turnaround or Priority Improvement motivates increased performance to ensure college- and career-readiness for all students, schools identified for Turnaround and Priority Improvement must implement a number of required interventions. Interventions include: (1) UIP requirements, (2) parent notifications, (3) Turnaround actions. These requirements are in place and are currently being implemented in the 2011-12 school year. For the 2012-13 school year, Title IA Priority Improvement and Turnaround schools also need to offer (4) choice and SES. In addition to the state requirements, additional interventions and supports are available for “focus schools.”

State Requirements

1. UIP requirements

Colorado law (SB-163, the Education Accountability Act) requires that all schools submit a Unified Improvement Plan for public posting on SchoolView, but schools with Turnaround and Priority Improvement plan type assignments must submit their plans to CDE three months prior to the posting deadline for review by CDE staff. CDE provides Turnaround and Priority Improvement schools with specific, actionable feedback that will assist them in their improvement efforts. To inform these reviews, CDE reviews against a set of Quality Criteria. These elements are those that would be included as part of a high-quality improvement plan. The Quality Criteria include “look-fors” such as those listed below, with the full list available at: http://www.cde.state.co.us/Accountability/Downloads/QualityCriteria-School.doc.

- Data Analysis and Narrative
  - Describes trends in data that reflect that the school/district reviewed the SPF and DPF and specifies where the school/district did not meet state expectations.
  - Reflects that the school/district reviewed progress towards prior year’s performance targets.
  - Prioritizes performance challenges, areas on which the school/district must focus attention.
  - Describes root causes of performance challenges such that, if removed, would eliminate or substantially alleviate the performance challenges.
- In describing root causes, specifies causes the school can control (e.g., the school does not provide additional support/interventions for students performing at the unsatisfactory level) rather than describing characteristics of students (e.g., race, poverty, student motivation); considers broad, systemic root causes (e.g., leadership, teacher effectiveness, curriculum alignment, instructional time, school climate).

- Describes stakeholder involvement in plan development (e.g., School Accountability Committee, staff, parents, community members).

**Targets and Interim Measures**

- Identifies the specific, quantifiable performance outcomes and interim measures that allow the school to determine, both formatively and summatively, whether the improvement efforts are making the desired difference.

- Specifies ambitious but attainable targets for every performance indicator (Achievement, Growth, Growth Gaps, Postsecondary and Workforce Readiness) where the school did not meet state expectations, including the disaggregated subgroups to which they apply (e.g., 3rd grade, English learners)

- Sets targets for increasing performance over time in a way that would, at a minimum, result in the school meeting state expectations within five years.

- Identifies the measure and associated metric of student performance used to assess performance more than once a year

**Improvement Strategies**

- Describes an overall research-based approach based on a theory about how performance will improve.

- Describes the specific change in practice that will result from the action steps (e.g., not “improve reading instruction,” rather “implement formative assessment practices in all 3rd-10th grade classrooms during reading instruction”).

- If the school/district is identified for Turnaround, at least one of the approaches outlined in SB-163, C.R.S. (3) (d) (see School and District Turnaround Options, below).

- Describes the action steps that will be taken to implement the improvement strategies, including the timeline, key personnel, resources and implementation benchmarks.

The 21st Century waiver would provide flexibility to districts and schools regarding how to leverage partners and use time during and after the school day to improve student outcomes.
Additionally, a State Review Panel reviews all school Turnaround plans and has the option of reviewing Priority Improvement plans. The State Review Panel is charged with considering the following:

- Whether the school’s/district’s leadership is adequate to implement change to improve results;
- Whether the school’s/district’s infrastructure is adequate to support school improvement;
- The readiness and apparent capacity of the school/district personnel to plan effectively and lead the implementation of appropriate actions to improve student academic performance;
- The readiness and apparent capacity of the district/school personnel to engage productively with and benefit from the assistance provided by an external partner;
- The likelihood of positive returns on state investments of assistance and support to improve the district’s/school’s performance within the current management structure and staffing; and
- The necessity that the district or school remain in operations to serve students.

2. Parent notification

Colorado law (HB11-1126, Improving Parent Involvement) requires districts to inform parents of a school’s assignment to an Improvement, Priority Improvement or Turnaround Plan within thirty days of notification. This communication must include a timeline for creating the UIP and notification of a School Turnaround Options.

3. Turnaround Actions

Colorado law (SB-163, the Education Accountability Act) specifies additional interventions that must be taken for schools identified as Turnaround, as outlined below. Additionally, no school may remain on Turnaround or Priority Improvement status for more than five consecutive years.

C.R.S. (3) (d) Identify specific, research-based strategies that are appropriate in scope, intensity, and type to address the needs and issues identified pursuant to paragraph (c) of this subsection (3), which strategies shall, at a minimum, include one or more of the following:

- (I) Employing a lead turnaround partner that uses research-based strategies and has a proven record of success working with schools under similar circumstances, which turnaround partner shall be immersed in all aspects of developing and collaboratively executing the turnaround plan and shall serve as a liaison to other school partners;
- (II) Reorganizing the oversight and management structure within the public school to provide greater, more effective support;
(III) For a district public school, seeking recognition as an innovation school or clustering with other district public schools that have similar governance or management structures to form an innovation school zone pursuant to article 32.5 of this title;

(IV) Hiring a public or private entity that uses research-based strategies and has a proven record of success working with schools under similar circumstances to manage the public school pursuant to a contract with the local school board or the institute;

(V) For a district public school that is not a charter school, converting to a charter school;

(VI) For a district charter school or an institute charter school, renegotiating and significantly restructuring the charter school's charter contract; and

(VII) Other actions of comparable or greater significance or effect similar to those delineated under NCLB, including turnaround, restart, close/restart and transformation models.

School Timeline and Consequences

Colorado law specifies additional interventions that must be taken for schools identified as Priority Improvement or Turnaround for more than five consecutive years.

C.R.S. 22-11-210 (5) (a) If a public school fails to make adequate progress under its turnaround plan or continues to operate under a priority improvement or turnaround plan for a combined total of five consecutive school years, the commissioner shall assign the state review panel to critically evaluate the public school's performance and determine whether to recommend:

(I) With regard to a district public school that is not a charter school, that the district public school should be managed by a private or public entity other than the school district;

(II) With regard to a district or institute charter school, that the public or private entity operating the charter school or the governing board of the charter school should be replaced by a different public or private entity or governing board;

(III) With regard to a district public school, that the district public school be converted to a charter school if it is not already authorized as a charter school;

(IV) With regard to a district public school, that the district public school be granted status as an innovation school pursuant to section 22-32.5-104; or

(V) That the public school be closed or, with regard to a district charter school or an institute charter school, that the public school's charter be revoked.

The state review panel shall present its recommendations to the commissioner and to the state board. Taking the recommendations into account, the state board shall determine which of the actions described in paragraph (a) of this subsection (5) the local school board for a district public school or the institute for an institute charter school shall take regarding the public school and direct the local school board or institute accordingly.
If a public school is restructured, the department, to the extent possible, shall track the students enrolled in the public school in the school year preceding the restructuring to determine whether the students reenroll in the public school the following school year or transfer to another public school of the school district, an institute charter school, or a public school of another school district in the state. The department shall provide the student tracking information, without personally identifying the students, to the local school board or the institute upon request.

4. Choice and SES

Recognizing that improvement plans may take the entire school year to implement and even longer to yield growth in student achievement, other immediate options need to be available to parents and students. Colorado will maintain options for School Choice Transportation (Choice) and Supplemental Educational Services (SES) for Title I Priority Improvement and Title I Turnaround schools. School districts with Title I Priority Improvement or Title I Turnaround schools must set-aside 15% of the district’s Title I funds to cover costs associated with School Choice Transportation and SES. Districts must provide parents with timely written notification of these options for their child.

Districts that meet demand for SES and Choice by the end of the first semester will be required to use the remaining set-aside funds to provide extended learning opportunities, such as before- or after-school programs, and summer school Priority Improvement or Turnaround schools. For example, if a district has spent 10% of the 15% set-aside, it could target the remaining 5% on a single school or all Priority Improvement or Turnaround schools. Including extended learning opportunities as a core intervention strategy will enable each school to improve student achievement through an expanded schedule that provide more instructional time in math, literacy, science, and other core subjects to enable students to meet state standards; integrates enrichment and applied learning opportunities into the school day that complement and align with state standards; and increased time for scheduling and organizing more time for planning, analysis, lesson design and professional development for teachers. At the end of the school year, unencumbered set-aside funds may be carried over into the next year as an extended learning opportunity set-aside or as regular Title I funds.

In addition, school districts that have Priority Improvement or Turnaround schools may, at the discretion of the district, set aside an additional 10% of its Title I funds to provide professional development tied to areas where the district’s performance falls short of expectations, similar to the current District Improvement set-asides. A Priority Improvement or Turnaround school district that has no Priority Improvement or Turnaround schools will be required to set aside 10% of its Title I funds in support of professional development tied to areas where the district’s performance falls short of expectations.
“Focus School” Interventions

CDE proposes the following interventions for all Title IA schools identified as “focus” schools, in addition to the state requirements for Turnaround and Priority Improvement schools. “Focus” schools will implement these interventions beginning in the 2012-13 school year and continuing on for at least the next three school years.

1. An approved Unified Improvement Plan

As described above, all schools are required to annually develop and submit a Unified Improvement Plan. “Focus” schools all submitted their Unified Improvement Plans on January 18th, 2012 to CDE. CDE is spending the rest of January and into February reviewing all Turnaround and Priority Improvement schools’ and districts’ UIPs. Feedback from the reviews will be sent to the LEAs to inform revisions to the final plans, due in April for public reporting. UIPs are implemented for the rest of the 2011-12 school year and continue through the 2012-13 school year. “Focus” schools will need to submit their UIPs again next January for review and approval.

Currently, CDE staff review all Turnaround and Priority Improvement school UIPs and provide feedback to each school. CDE will provide support to the 70 “focus” schools in creating and implementing an approvable UIP plan (see the SEA roles section below for more details). Performance Managers will be assigned to each “focus” school and tasked with providing technical assistance to schools in developing their UIP in the 2012-13 school year. The Performance Manager will help facilitate the school’s data analysis, identification of root causes and development of improvement strategies, as well as support the monitoring of the school’s plan.

To maximize the benefits of the UIP process for “focus” schools, CDE will also work to integrate more criteria concerning effective strategies for English learners and students with disabilities into its reviewer rubric. Program staff with expertise on ELs and students with disabilities are included in the UIP reviews of many schools, and provide targeted feedback to schools, specific to their context, of appropriate interventions and supports. However, CDE is developing a plan to better document specific examples that can be replicated in other schools in the bi-monthly “Special Populations UIP Working Group” meeting with the Office of Unified Improvement Planning and staff from relevant EL and students with disabilities offices.

Through the end of the 2011-12 school year and into the beginning of the 2012-13 school year, CDE will strengthen the UIP reviewer rubric to ensure that approved plans, based on the rubric, will lead to significant school improvement, when implemented with fidelity. The rubrics will include more details around effective strategies for students with disabilities and English learners, based on the work of the Special Populations UIP Working Group. Rubrics will also differentiate strategies for elementary, middle and high school levels, as appropriate.
CDE has already developed a plethora of materials (http://www.cde.state.co.us/uip/index.asp) to support schools and districts in the UIP process. Performance Managers will be able to use these materials in their work with “focus” schools.

To ensure that LEAs support schools in this process, CDE will make approved UIPs for all “focus” schools a condition of the release of Title IA funds through the Consolidated Application process. This requirement will ensure that both LEA staff and CDE Performance Managers support the “focus” schools.

2. Bi-Monthly Implementation Checks

The work from the SIG process will be leveraged for use in implementation check-ins. In the 2012-13 school year and beyond, Performance Managers will check-in with schools on a bi-monthly basis to determine progress on the interim measures and implementation benchmarks established in the school’s Unified Improvement Plan. If schools are not making progress against their implementation benchmarks, or are not seeing the progress needed on their interim measures, additional supports and resources will be deployed to the schools, as brokered by their Performance Managers.

3. Grant prioritization

“Focus” schools will be given priority in 1003(a) grant eligibility, including for the school diagnostic review grants and school Improvement Partnership Grants for the 2012-13 grant cycle. Based on the findings in national research and CDE’s work with High Growth Title I schools, the grants focus on the areas of best first instruction, leadership, and positive climate and culture. Each of these components directly impacts the instruction received not only by all students, but especially the educational experience for English learners and students with disabilities.

The SEA and LEAs play very important roles in improving the outcomes in “focus” schools by supporting and monitoring the required interventions.

SEA Role

As all of the “focus” schools are Turnaround and Priority Improvement schools, there are clear roles the SEA plays in supporting those schools.

Based on the results of the school performance framework, the SEA, via the State Board of Education, directs schools and their local boards to annually develop and adopt a Priority Improvement and Turnaround plan. Once submitted, CDE staff are responsible for reviewing Unified Improvement Plans. Staff carefully assess plans using a set of rigorous quality criteria, as evident in the review form in Appendix 9. Starting in the 2012-13 school year, CDE Performance Managers will have the additional responsibility for working with the “focus” schools to ensure an approvable plan. After an
initial review, if the “focus” schools do not have approvable plans, the Performance Manager will follow-up with the LEA to help the school create an approvable plan. This will consist of working with the LEA and school around data analysis, identification of root causes, targets, and major improvement strategies. The Performance Manager will also check-in with the school throughout the year, beginning in 2012-13, on a bi-monthly basis, to discuss progress on interim measures and implementation benchmarks, as detailed in their UIP.

Additionally, the Commissioner and the State Review Panel will play a key role in reviewing the UIPs. The Commissioner may assign the State Review Panel to review Priority Improvement plans and must assign the State Review Panel to review Turnaround plans. The State Review Panel are a body of external education experts, selected by the Commissioner, with the approval of the State Board of Education, based on their expertise in areas such as school improvement, instruction and assessment, data management and analysis, and school district leadership or governance. Their task is to critically evaluate a school’s Priority Improvement or Turnaround plan and to recommend modifications. Specifically, the State Review Panel is charged with reviewing Unified Improvement Plans to determine:

- Whether the district’s/school’s leadership is adequate to implement change to improve results;
- Whether the district’s/school’s infrastructure is adequate to support school improvement;
- The readiness and apparent capacity of the district/school personnel to plan effectively and lead the implementation of appropriate actions to improve student academic performance;
- The readiness and apparent capacity of the district/school personnel to engage productively with and benefit from the assistance provided by an external partner;
- The likelihood of positive returns on state investments of assistance and support to improve the district’s/school’s performance within the current management structure and staffing; and
- The necessity that the district or school remain in operation to serve students.

The complete Feedback Form used by the State Review Panel, from which the above is excerpted, can be found in Appendix 9.

The State Review Panel also serves in an advisory role to the Commissioner and the State Board of Education should a school remain assigned to a Priority Improvement or Turnaround plan for more than five consecutive years. At that point, based on their assessment of a school’s progress in implementing its improvement strategies and improving student outcomes, the State Review Panel may recommend actions such as public or private management, charter revocation, or school closure.
LEA Role

As described previously, all “focus” schools are required to annually develop and submit a Unified Improvement Plan just as all other schools in the state are required. The school-level plan is submitted to the LEA, and the LEA submits it to the SEA.

As all “focus” schools fall within the subset of Priority Improvement and Turnaround schools, there are responsibilities for the local school boards. The LEA is also responsible for following up with schools to address concerns or make modifications suggested by the SEA or State Review Panel. To support LEAs in their development and oversight of school Priority Improvement and Turnaround plans, in the fall of 2010, CDE hosted three full-day regional trainings for districts with schools assigned a Priority Improvement or Turnaround Plan. The sessions were designed for the SEA to provide LEAs guidance in the district’s role in supporting schools in the development and implementation of UIPs. Outcomes of the sessions were to:

- Provide views of performance data schools need to determine priority needs, annual targets, and root causes.
- Develop a plan for working with schools to:
  - Complete data analysis (describe significant trends, identify priority needs, and determine root causes of priority needs);
  - Set annual targets monitored by interim measures;
  - Select improvement strategies and action steps (that are appropriate to the level of need and state/federal accountability designation for each school) monitored using implementation benchmarks; and
  - Meet requirements for schools also identified for Title I Improvement (corrective action or restructuring).
- Determine the process and tools that will be used in local review of /feedback about school plans.
- Determine the relationship between district and school-level improvement plans.
- Provide feedback to CDE about additional support needs.

CDE intends to provide similar training opportunities to LEAs to support their “focus” schools. As districts and schools are now into their second full year of developing, submitting and implementing Unified Improvement Plans, CDE also intends to shift the focus toward the implementation of interventions and progress-monitoring.
2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

CDE proposes to exit schools from “focus” status if they can demonstrate:

1. Two consecutive years of an Improvement or Performance school plan type assignment, based on the School Performance Frameworks (either their 1 or 3 year rating), or

2. Two consecutive years of disaggregated student achievement data equivalent to a meets rating (either their 1 or 3 year rating) for schools identified by a gap, or

3. Two consecutive years of the Graduation Rate indicator rating of meets, based on the School Performance Frameworks (either their 1 or 3 year rating) for schools identified for low graduation rates.

Two consecutive years of improved performance will provide a sufficient indication of sustained improvement.
2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

Describe how the SEA’s differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

As shown in Figure 3, there are universal components to the State’s differentiated recognition, accountability and support system which apply to all schools and districts, regardless of their performance framework rating. All schools and districts participate in the Unified Improvement Plan process, a process which builds continuous improvement for student achievement and narrowing achievement gaps by analyzing the instruction students receive. CDE also provides universal supports to all schools and districts in Colorado that are tied directly to increasing the quality of instruction for all students.

Unified Improvement Plan (UIP)

The Unified Improvement Plan (UIP) process embodies Colorado’s philosophy of continuous improvement as it requires reflection and action, guiding ALL schools and districts toward focusing their improvement efforts and funds on the areas of greatest need. The UIP process leads schools and districts through in-depth data analyses, identification of performance challenges, root cause analysis of those challenges, and the development of action steps, targets and benchmarks designed to address the performance challenges. In Colorado, the Unified Improvement Planning (UIP) process has become the bridge that links accountability and support.

Colorado knows that creating an improvement plan can significantly focus a school or district’s attention on instruction and achievement. However, when schools and districts are asked to complete separate improvement plans for Title I school programs, Title I Improvement, Title II 2141(c) identification, Title III improvement, High Priority Graduation Designations and state Turnaround plans, a school or district’s ability to use the plan to focus their actions is lost. Three years ago, in response to growing concerns from the field about the number of required improvement plans, the State set out to design a system that streamlines all improvement planning requirements into one document. The resulting template provided in Appendix 5 or posted on the web (www.cde.state.co.us/accountability/UnifiedImprovementPlanningTemplates.asp) is simple and provides schools and districts with a structure that is flexible enough to meet their own unique planning needs – while still enabling them to meet state (i.e., SB-163 state accountability) and federal (i.e., Titles I, IIA, III) improvement planning requirements. The process has pushed many schools and districts to truly focus on their performance challenges, determine root causes and align resources and actions to address those identified challenges. It is also helping to shift improvement planning from an “event” to a “continuous improvement” cycle.
After phasing in and refining the template over the past two years, all schools and districts are now required to submit an improvement plan using the UIP template. The basic layout includes:

- **A pre-populated report.** This is a brief report created by the state that lists the state and federal accountability expectations, the school or district’s performance on the accountability measures and whether the school or district met the expectations. This report also identifies whether the school or district is identified for improvement under state and/or federal accountability.

- **A data narrative.** Schools and districts must: (1) review current performance (including annual performance targets set in the previous year) and describe trends; (2) prioritize performance challenges; (3) determine the root causes of those performance challenges; and (4) create the data narrative. The analysis builds upon the SPF/DPF and AYP status reports as the starting point for data analysis. All districts and schools are expected to consider at least three years of data and **must address indicator areas where they do not at least meet state or federal performance expectations.**

- **Target Setting.** Schools and districts must supply their annual and interim targets for their identified performance challenges. This includes setting targets that meet state and federal requirements. Overall, these performance targets need to move schools and districts aggressively towards state expectations (AMOs) for each performance indicator, while at the same time considering what is possible in a given timeframe and the schools’ or districts’ current status.

- **Action Planning.** Based on the priority performance challenges identified in the data narrative, schools and districts must then identify major improvement strategies (no more than three). These strategies are then broken into action steps that include timelines, resources and implementation benchmarks.

- **Addenda Forms.** Because of the wide variety of reporting requirements, schools and districts may choose to supplement their UIP document with program specific forms that help to ensure that all state and/or federal requirements are met (e.g., Title I Schoolwide program, Title IIA 2141c).

In completing the UIP process and the components listed above, public accountability is central. Stakeholders, including principals, teachers, parents, and community members are expected to participate in the plan development. Colorado law (HB11-1126, Improving Parent Involvement) requires that in schools rated Improvement, Priority Improvement, or Turnaround Plan districts must inform parents of the timeline for creating the UIP and provide notification of a public hearing to review the final plan before adoption. All schools, regardless of plan type assignment, are expected to hold a public hearing to review the plan before its final adoption by the local board. Staff and accountability committees are required to review school and district progress on a quarterly basis. By requiring a transparent process for improvement planning, schools and districts will ensure that all performance concerns are addressed.
The review, timeline and requirements to be addressed in the UIP are differentiated by the type of identification under state accountability and identification under ESEA programs (i.e., Titles I, IIA and III). This reflects the philosophy that the state increases scrutiny and support for schools and districts that are struggling. Schools and districts identified as Turnaround and Priority Improvement are required to submit plans by January 17th. CDE and a State Review Panel then provide actionable feedback to the schools and districts so that they can revise their plans for submission on April 15th.

The state posts all school and district improvement plans publicly on SchoolView (http://www.schoolview.org/performance.asp) after the April 15th submission. This encourages transparency and local accountability and also enables schools and districts to learn from each other. For example, using the review of plans submitted to CDE in 2010-11, CDE summarized key findings at various follow-up support sessions in the Spring of 2011. CDE also selected examples from the 2010-11 submitted plans to annotate; these annotated reviews present the strengths and weaknesses of the plans to highlight focus areas for all schools and districts. For examples, please see “Unified Improvement Plan Examples” at: http://www.cde.state.co.us/Accountability/UnifiedImprovementPlanningResources.asp. Additionally, CDE has documented the process that schools and districts have engaged in as they implement their unified improvement plans in a local context. CDE, with the support of contractors, is developing a collection of written case stories, artifacts and video to represent the planning successes and challenges of the following districts: Aurora, Cherry Creek, Elizabeth, Falcon, Ft. Lupton, Garfield 16, Greeley, Jefferson County, Montrose, Poudre, St. Vrain, Summit and Woodlin. The content provides perspective on a range of compelling questions, including:

1. How has unified improvement planning been helpful for the district?
2. How have we built staff capacity to engage in the planning process?
3. How did we ensure that data was meaningful to our district’s teachers, leaders and their communities?
4. How has our district ensured safe but honest root cause analysis?
5. How did our district use diagnostic reviews to inform our planning?
6. How will our district monitor the implementation of our improvement plan?

Finally, the state differentiates its levels of support for the UIP process depending upon the level of concern for the school or district. CDE has provided a vast number of resources and trainings available to all school and district leadership. Trainings include regional sessions to provide hands-on support for all schools and districts, as well as sessions tailored to the unique needs to Priority Improvement and Turnaround schools and districts. Resources include a guidance handbook, quality criteria (elements of a plan that reviewers should look for), annotated examples, online tutorials and training materials (available from state-sponsored training that can be used for local trainings). To access these resources, please go to: http://www.cde.state.co.us/accountability/UnifiedImprovementPlanningResources.asp.
Tiered System of Supports (TSS)

CDE has developed a tiered system of supports (TSS) to respond to the range of needs in Colorado schools and districts and ensure implementation of interventions in Turnaround and Priority Improvement schools. The system is based on data analyses of the most struggling and most effective schools and districts in the state. Increasing degrees of support and funding options are provided for schools and districts that are among the lowest performing. Conversely, it offers increasing levels of autonomy for higher performing districts. The TSS is a coherent continuum of evidence based, system-wide practices to support a rapid response to academic and behavioral needs. There is follow up with data-based monitoring for instructional decision-making to empower schools and districts to create systems that support each student in achieving college- and career-readiness.

Tiers of supports are organized using performance from the school (SPF) and district (DPF) performance frameworks. Schools and districts with the following designations are provided with the specific supports listed in Table 20 below. Districts with the highest accreditation categories (Accredited with Distinction, Accredited, or Improvement) and schools with the highest plan types (Performance or Improvement) are offered universal supports from CDE, as described below. In addition to these offerings, districts with this level of performance are provided greater levels of autonomy.

In contrast, an increasingly intense set of services and supports are in place for schools and districts that fall into the lowest levels of performance (Turnaround and Priority Improvement).

Table 20. Tiered Support System

<table>
<thead>
<tr>
<th>District</th>
<th>Schools</th>
<th>Supports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accredited with Distinction</td>
<td>Universal</td>
<td></td>
</tr>
<tr>
<td>Accredited</td>
<td>Performance Plan</td>
<td>• CDE Support Manager</td>
</tr>
<tr>
<td>Accredited with Improvement Plan</td>
<td>Improvement Plan</td>
<td>• Variety of services and support to “Opt In”</td>
</tr>
<tr>
<td>Accredited with Priority Improvement Plan</td>
<td>Priority Improvement Plan</td>
<td>• Performance Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Targeted intervention and supports</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Reduced program autonomy and flexibility</td>
</tr>
</tbody>
</table>
Accredited with Turnaround Plan  Turnaround Plan  • Performance Manager
• Intensive intervention and supports
• Least program autonomy and flexibility

Colorado’s accountability system creates incentives to focus on improved student achievement for all students. As the performance indicators begin at an individual student level, and create student specific adequate growth targets, incentives are built into the measure to encourage schools and district to ensure that all students both meet at least typical median growth, and make enough growth to be on track to become/remain proficient. At the district level, the system has incentivized high performance by committing to allow greater autonomy for those districts at the highest level. Higher performing districts have more discretion in planning, resource allocation and program implementation. At the risk of oversimplifying, for higher performing districts it is, “Call us if you need us.” For lower performing districts it is, “You don’t need to call us, we’ll call you.”

Universal and Differentiated Supports

CDE has developed supports in a broad array of content areas. These supports have been created to respond to the range of needs among Colorado schools and districts. Many of the supports are based on data analyses of the most struggling and most effective schools and districts in the state. Although support and technical assistance are available to all Colorado schools and districts, CDE prioritizes low performing school and districts for intensive, ongoing, and purposeful support. Low performing schools and districts are assigned a performance manager who works with schools and districts through a process of diagnostic reviews and root cause analysis to identify needs. Once needs have been identified, the performance manager supports the school and district planning process and matches the school or district with the supports that are most likely to effectively address the needs resulting in improved school and district performance. Among the content areas in which CDE provides support to school districts are:

<table>
<thead>
<tr>
<th>Support Area</th>
<th>Strengths</th>
<th>Results in:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standards Implementation</td>
<td>Curriculum and instruction</td>
<td>Increased student achievement in college- and career- ready standards</td>
</tr>
<tr>
<td>Language Acquisition</td>
<td>Curriculum and instruction</td>
<td></td>
</tr>
<tr>
<td>Early Childhood Education</td>
<td>Curriculum and instruction</td>
<td></td>
</tr>
<tr>
<td>Data analysis and interpretation</td>
<td>Continuous improvement</td>
<td></td>
</tr>
</tbody>
</table>
Each of these supports directly relate to strengthening instruction and increasing student achievement. Through the UIP process and the universal supports available for schools and districts, CDE helps to ensure continuous improvement in all schools, especially those not making progress in improving student achievement and narrowing achievement gaps. The UIP requires schools and districts to identify the indicators in which they do not meet or approach State targets, identify the root causes, and create action plans to increase student achievement. Schools and districts may access any of the State supports that effectively address their identified root causes.

**School Support Team (SST) and Comprehensive Appraisals for District Improvement (CADI) Reviews**

The SST and CADI processes are part of “... a statewide system of intensive and sustained support and improvement for local educational agencies and schools... in order to increase the opportunity for all students to meet the State’s academic content standards and student achievement standards” (ESEA, section 1117). Colorado created this appraisal process to provide a comprehensive review of schools and districts on ESEA Improvement. With approval of this waiver request, the review processes will focus on schools and districts on Priority Improvement or Turnaround. During the review, teams of highly skilled educators use document analysis, observations, and interviews to collect data around the nine standards that research has shown to be most crucial in becoming a high performing school or district. The process primarily supports three activities:
Facilitated Data Analysis

Review Team Visit

Roll out of Results

**Comprehensive System Examination**

The schema for a comprehensive system examination blends the outcomes of SST/CADI reviews with a set of TSS implementation rubrics developed around an effective, evidence-based educational framework. The former identifies areas where a school or district likely needs to put a concentrated focus, whereas the latter provides a rubric against which the school or district can assess its implementation of a coherent continuum of evidence-based, system-wide practices to support a rapid response to academic and behavioral needs. This may impact the school and district’s flexibility and use of state, local and federal funds.

**Program Quality Indicators (PQIs)**

Similar to the CADI and SST standards, indicators, and protocols that will be used to review school and districts systems, CDE is developing ESEA program quality standards and indicators. The PQIs will be used to assess and improve local program quality, especially among low performing schools and districts. PQIs will be added to Colorado’s Federal Integrated Review System (C-FIRS) of program monitoring to help raise the bar from compliance to compliance and quality. Districts identified as Priority Improvement and Turnaround districts will receive Program Quality Reviews to help ensure the maximum return on program investment.

The PQIs will also be used to establish more rigorous criteria for the approval of low performing districts’ consolidated applications and the subsequent release of funds. CDE believes that through the infusion of these standards and indicators into the application, monitoring and supports, local program quality will be improved and student achievement will be increased.

**Grant Opportunities**

CDE has created specific grant opportunities with 1003(a), reallocated 1003(a) and 1003(g) to support School districts and schools identified as Priority Improvement and Turnaround in building their capacity to increase student achievement. The grants have been created to lead schools and districts through an intensive, supported process of continuous improvement. They have been developed by using the data and expertise we’ve gained through implementing School Improvement Grants over the last 8 years, analyzing the most common challenges in low performing schools and comparing them to our most effective high needs schools. Funds are awarded on a competitive basis and prioritized to those furthest along in the improvement cycle. The following provides a description of the grant opportunities/intensive supports available to the lowest performing schools and districts.
School and District Diagnostic Review Grant

CDE provides funds for planning and appraisal services to eligible Title I schools and districts. Through the grant funds each eligible school/district receives money for a facilitated data analysis, a school or district diagnostic team review (see above) and assistance with incorporating these reviews in Unified Improvement Planning (UIP).

Awarded funds are used for the following purposes:

**Facilitated Data Analysis**, which includes:
- Review of student performance data
- Identification of trends and performance challenges
- Prioritization of performance challenges
- Root cause analysis
- Engaging relevant stakeholders in data analysis

**Contracting for an SST or CADI visit**

**Integrated Data Roll Out** includes a facilitated roll out of results from (1) the data analysis and (2) CADI/SST report findings as related to prioritized performance challenges and integrated into the school/district’s root cause analysis.

**Support for Action Planning**, which may include:
- Verifying the root cause analysis of identified performance challenges;
- Target setting;
- Action planning; and
- Engage relevant stakeholders in action planning process.

School and District Improvement Support Partnership Grants

The purpose of this grant is to provide funds to eligible schools and districts to support a focused approach to improvement in the following areas. The grants are sequential, and Option 1 must be taken first, or evidence must be shown that the activities in Option 1 have already occurred.

**Option 1**

Facilitated Data Analysis, which includes:
- Review of student performance data;
- Identification of trends; and
- Prioritization of performance challenges;
Option 2

Grant funds for implementation of:
- Best First Instruction;
- Leadership; and/or
- Positive Climate and Culture.

Analysis of some of Colorado’s high growth Title I schools and other high performing schools and districts has shown that the three components listed above are the most crucial in school and district turnaround.

Targeted District Improvement Grants

This grant program provides support districts that are identified as Accredited with a Priority Improvement or Turnaround plan.

CDE has prioritized partnering with a subset of Priority Improvement and Turnaround school districts in strategic improvement planning, implementation, and progress monitoring process to significantly improve student achievement through Targeted District Improvement Grants which involve the following:
- Creation of a district team to work alongside a CDE Cross Unit team
- Participation in the CADI process
- Team participation in the review of the CADI and prioritization of 3-4 focus areas
- Engagement in root cause analysis of the 3-4 focus areas
- Evaluation of available strategies and resources to address the focus areas
- Creation of district UIP in partnership with the CDE Cross Unit Team that addresses the improvement focus areas
- Partnership with CDE’s Cross Unit team for 3 years to implement the plan

Tiered Intervention Grants (School Improvement Grants-SIG)

This grant program utilizes Title I 1003(g) funds to support districts that have chronically low performing schools in the lowest 5% of achievement (Turnaround schools) as indicated by state assessments. Since this is the lowest tier of schools, the intent of this grant is to provide funding for districts to:
- Partner with CDE in the implementation of one of the four intervention models provided in the guidance for the use of Federal Title I 1003(g) funds;
- Increase the academic achievement of all students attending chronically low performing schools through the development of a coherent continuum of evidence based, system-wide practices to support a rapid response to academic and behavioral needs; and
Utilize the support and services from external providers in their efforts to accomplish the above.

Intensive monthly progress monitoring occurs by CDE both onsite, by phone and by other electronic means.

**High Growth, High Poverty Schools**

The purpose of this grant is to identify Title I schools identified as high growth/high poverty, collect data through a SST review and debrief, and disseminate their best practices to schools with similar demographics around the state, through technology and other means. Through intense quantitative and qualitative data analysis of the Title I schools with the highest median growth percentiles for students needing to catch-up, the state is learning why they were able to achieve high academic growth despite barriers similar to those of the state’s lowest achieving schools.

The results from this study are being used to help identify those practices most likely to result in increased achievement among struggling schools in Colorado. The schools are capturing their effective practices through video, written descriptions and a principal summit, in order to share with schools with similar demographics but struggling performance. CDE plans to create a lab school model where these schools can serve as model sites for the state.

**Identification of and Supports for Additional Title I Schools Not Making Progress**

Along with tracking the progress of all its Title I schools through the School Performance Frameworks, Colorado will specifically analyze whether or not Title IA schools are attaining AMOs overall and for all disaggregated groups, or making progress towards those AMOs. Schools that are not making AMOs overall will be flagged as having overall challenges. Additionally, those that are just missing AMOs for certain disaggregated groups of students will also be identified for more targeted supports. Schools will analyze this data in their UIPs for use in determining performance challenges.

Supports available to schools identified as Turnaround, Priority Improvement, “priority” and “focus” have already been described. But, those additional Title I schools that are not making progress in improving student achievement and narrowing achievement gaps will be eligible and targeted for additional supports and interventions. (These are also available for the “priority” and “focus” schools as well, if not already mentioned).

1. **School-level Diagnostic Reviews**

These schools will be eligible for and offered the opportunity to participate in school-level diagnostic reviews (supported with 1003a funds), which will assist with the school’s identification of root cause for the lack of performance by one or more subgroup of students. Title IA schools identified as Turnaround, Priority Improvement, “priority” and “focus” will be followed by these additional struggling schools for funding priority.
2. Improvement Strategic Partnership Grants
As with the diagnostic reviews, Title I schools that are not making progress in improving student achievement and narrowing achievement gaps will be eligible for Improvement Strategic Partnership (ISP) grants, which will provide additional funds for schools to reconcile the root causes for poor performance. The lowest performing Title I schools will be given priority for these grants (1003a funds) in the same manner as for the diagnostic reviews. In keeping with the state’s philosophy of more scrutiny as academic performance lags, these schools would have limited options with respect to actions to be taken, based upon the root cause analysis. These schools are also eligible for 21st Century Community Learning Centers grants that if we received the waiver would lead to greater personalized learning experience to better meet individual student needs and allow schools to significantly expand learning time and to think creatively about use of time, technology, staff, and partnerships to improve student outcomes and engagement. It should be noted that the “supplement, not supplant” requirements of the 21st Century program grants will be applied to any school using funds for this purpose to ensure that funding is used to efficiently create high-quality additional learning time and not “backfill” for any other source of funding that may be under budgetary pressure.

3. Targeted Interventions
Schools that are identified specifically for struggles with students with disabilities and English learners will be flagged. These schools will be intentionally invited to access professional development opportunities and other supports provided by CDE regarding effective instructional practices for students with disabilities and English learners (many of which are described in Principle 1 above).

4. Finding and Sharing Model Schools
Colorado has conducted a study of high growth Title I schools, which identified a particular set of conditions that lead to higher academic growth among the most at risk students. These high growth schools had a laser like focus on student achievement and a no-excuse belief for all students. Struggling Title I schools will receive guidance to help develop these same characteristics in their schools. If there are 1003(a) funds still available, these schools would be eligible for grants to leverage the knowledge from the high growth schools.

Colorado will continue to provide incentives to high growth Title I schools through diagnostic reviews of best practices that are providing the framework for increased growth by students most at risk. By tracking these best practices and providing access to these for struggling Title I schools (including web-based video and access to technical assistance), the state believes that it can be instrumental in helping these schools improve outcomes for students.

The Expanded Learning Opportunities team at CDE, in partnership with the Colorado Legacy Foundation, is incubating proof points in the field that exemplify elements of the ELO vision to develop models and document and share best practices. The ELO team is also developing a resource bank to share information, tools, videos, and models and providing technical support and design assistance to help schools and districts transform the learning experience to better engage students and improve outcomes.
5. Program Quality Indicators
Colorado is developing program quality indicators that will assist struggling Title I schools with implementing a Title I program that more closely resembles the characteristics of a high quality program. These program quality indicators describe the practices necessary to accelerate the growth of students most at risk of not meeting state standards. For example, one program quality indicator describes the outcomes that should be progress monitored in order to change or alter the intervention for students that continue to struggle. These indicators will permit the state to require struggling Title I schools to alter their practices to more fully align with the program quality indicators.

6. Review of Use of Funds
Additionally, Title I schools that continue to struggle will receive closer scrutiny in their use of funds. The data from the Title IA High Growth Schools as well as from the Program Quality Indicators will be used to assist struggling schools with more effective use of resources and, ultimately, increased achievement from those students most at risk of not meeting state standards.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

CDE builds district and school capacity to improve student learning, particularly in Turnaround and Priority Improvement through its system of performance management for continuous improvement. Managers are assigned to all districts; Performance (Improvement) Managers are assigned to all districts identified as Priority Improvement or Turnaround. Improvement Managers act as liaisons between CDE and districts and schools. They work closely with State Cross-Departmental Programs and Leadership teams as well as local School and District Leadership Teams in identifying needs, planning, implementation, and progress monitoring.
State Performance Management and Monitoring

Districts in Priority or Turnaround status or schools with Priority or Turnaround plan assignments are assigned an improvement manager at CDE. This manager works at both the school and district level to help define needs and resources available to help meet the performance challenges. The intensity and amount of structure in supports increases the longer the school/district remains in the lowest categories. Shared ownership of processes and accountability are key to the State’s system.

At the state level, a cross-departmental team meets weekly to create and analyze “data boards” for each of the Priority Improvement and Turnaround schools and districts. This allows CDE to make data-based decisions with input from multiple offices about future activities and interventions and informs the interactions of program staff. The data boards also allow for tracking improvement over time of districts’ and schools’ performance. Information included on the data boards includes the school/districts’ accountability status (DPF/SPF results), grant participation, funding sources and eligibility, the school/district’s UIP, and data from the Data Center, such as school climate and teacher equity. CDE Performance Managers utilize these data boards to better understand the systems in which they are working and to make data-based decisions regarding school and district improvement efforts.
Performance Managers also perform a liaison role between school districts and external vendors. Although CDE no longer maintains a list of approved providers, the Department does provide assistance to schools and districts in the vetting of providers. CDE maintains a list of providers by topic area on its website. The site also includes information that can be used and questions that can be asked to ensure the effectiveness of providers prior to entering into a contract for services. Once a vendor has been selected, Performance Managers facilitate the process of strategy selection and implementation.

Along with the progress monitoring conducted by the Performance Managers, school Turnaround sites (SIG schools) are monitored to ensure both compliance and quality of plan implementation. As part of the Colorado Federal Integrated Review (C-FIR) process, onsite review teams visit school Turnaround sites to ensure that school improvement grant funds are being used effectively and that plans are being implemented with fidelity.

Through this performance management system, which included regular communication and monitoring, CDE believes that the required interventions for Turnaround and Priority Improvement schools will result in increased student achievement in these schools.

Additionally, the results from the effective schools study have informed our focus for the structure, sequence and allowable uses of funds in 1003 (a) and (g) improvement grants.

c. Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

As described in 2.D.iii., consequences for schools on Turnaround and Priority Improvement are included in SB-163 legislation. This legislation ensures that there is accountability for improving school and student performance; and if improvements do not occur, there are consequences for the schools.

Additionally, SB-163 includes provisions for low performing LEAs. In order for schools to make improvements, accountability also needs to exist at the LEA level.

Approval of our waiver will allow the state to utilize limited resources in a more focused and intentional way to best support all schools and districts. In turn, it will foster partnerships with impacted schools and districts to attain increased capacity through comprehensive monitoring, targeted technical assistance, and ensuring fidelity to implementation of research based practices. Best practices from districts with higher levels of performance and autonomy will be captured and shared as part of the technical assistance opportunities. Most importantly, school and district leaders in Colorado will be empowered to create systems that support each student to achieve college- and career-readiness.

The goal of Colorado’s accountability system is not 100% of students meeting basic proficiency levels by a specific point in time. Instead, the goal of the system is for all students to be college and career ready by the time they graduate. The entire system has student growth as its foundation. As outlined
in the preceding pages, Colorado’s process is designed to foster student, classroom, school, district, and statewide continuous improvement. Colorado’s process is likely to help build state and local capacity for the reasons delineated below.

As its core, the system has school and district performance frameworks that were designed with extensive stakeholder input. The frameworks provide a more comprehensive assessment of school and district performance and therefore have credibility and meaning that simply does not exist with the current federal system.

The system also sustains and improves itself through its transparency. Through SchoolView and other public reporting requirements, educators have easy access to information that can help them improve their schools and parents have access to information that will help them ask the right questions to drive improvement of their local school or information about a nearby school that might provide better options for their child.

Through its Comprehensive Appraisals for District Improvement, School Support Teams, and Quality Program Indicators, Colorado has defined the elements of a high quality district, school, and local ESEA program. Through its onsite diagnostic reviews, CDE can determine the degree to which Colorado districts, schools, and programs measure up to the standards. The report generated following the review begins the process of getting them from where they are to where they need to be. CDE provides training in support of schools and districts that would like to use the standards and indicators and rubrics to self assess for continuous improvement.

Colorado’s accountability system provides incentives for high performance and supports to low performers. The primary incentive for increased performance is increased autonomy. State and district partnerships form the basis of support for low performers. Partnerships, utilizing a performance management model, include a needs assessment, planning support, progress monitoring, as well as targeted interventions and ongoing technical assistance. The Partnerships and supports are specifically designed and delivered to build local capacity and sustainability.

Colorado’s system requires all schools and districts to develop improvement plans annually, regardless of the level of performance. The improvement planning process requires schools and districts to engage in root cause analysis and to establish plans to improve in any and all areas where performance fell short of expectations.

Finally, Colorado’s accountability system has real consequences for continued low performance. Low performing schools and districts that do not improve over time face closure or turnaround as described in the previous section.
Colorado’s accountability system has growth as its foundation. The system asks students, schools, and districts to continue to improve performance. But the crafters of the system knew that just as the system requires the entities within to improve, the system itself must improve as well. That is why a stakeholder committee will be convened annually to review the components and performance of the system and make recommendations for its improvement. Colorado’s system may not be perfect but, like the students it is designed to protect, Colorado’s system of accountability and supports will continue to grow in what it knows and is able to do.
PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
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<tbody>
<tr>
<td>☐ If the SEA has not already developed any guidelines consistent with Principle 3, provide:</td>
<td>☐ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide:</td>
<td>☒ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide:</td>
</tr>
<tr>
<td>i. the SEA’s plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;</td>
<td>i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students;</td>
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<tr>
<td>ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and</td>
<td>ii. evidence of the adoption of the guidelines (Attachment 11);</td>
<td>ii. evidence of the adoption of the guidelines (Attachment 11); and</td>
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<tr>
<td>iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).</td>
<td>iii. the SEA’s plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;</td>
<td>iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.</td>
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<td>iv. a description of the process used to involve teachers and principals in the development of the adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and</td>
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<td></td>
<td>v. an assurance that the SEA will submit to the Department a copy of the remaining guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).</td>
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3.A.i. Explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students.

Colorado’s passage of the landmark educator effectiveness bill in 2010 (SB 10-191) has been in the national spotlight and has begun to influence reform initiatives in other states. The main purposes of the bill are:

- To invest in a system to evaluate the effectiveness of licensed personnel in order to provide meaningful feedback to educators about their practice and thereby improve the quality of education in Colorado
- To ensure that evaluation provides a basis for making decisions in the areas of hiring, compensation, promotion, assignment, professional development, earning and retaining non-probationary status and nonrenewal of contract personnel
- To ensure that educators are evaluated in significant part based on their impact on student growth.

The premise is that these principles will lead to a statewide teaching workforce that will increase its effectiveness at improving student achievement. Other major highlights of Colorado’s educator effectiveness work include:

- Creating a statewide standard for what it means to be an “effective” teacher or principal in Colorado
- Creating a focus on providing meaningful feedback and support to educators to improve their practice
- Ensuring that academic growth accounts for half of an educator’s annual evaluation
- Prohibiting forced placement of teachers;
- Making non-probationary status “portable”
- Ensuring an annual evaluation of all teachers and principals
- Assigning each teacher and principal with a rating of ineffective, partially effective, effective and highly effective.
- Expanding the reach of the best teachers to touch more students through differentiated staffing models and the use of technology.

Colorado’s adopted guidelines for teacher and principal evaluation are included in Attachment 10. How Colorado’s guidelines will lead to the development of evaluation and support systems that increase the

Implementation Timeline

**March 2011:** State council made recommendations to the Colorado State Board of Education on teacher and principal standards, definitions of effectiveness and guidelines for implementation.

**Summer 2011:** State selected pilot districts to test the model of evaluation.

**September 2011:** State council begins work on developing recommendations for the evaluation of non-licensed personnel and the appeals process.

**Fall 2011:** State begins pilot of the model evaluation system.

Policy Development Timeline

**June 2011 - October 2011:** Colorado State Board of Education begins the rule promulgation process, with input from stakeholders and CDE.

**November 2011:** Colorado State Board of education submits the rules to the legislature for review.

**February 2012:** General Assembly reviews the rules and either approves or repeals provisions.

**May 2012:** For any provisions that are repealed by the General Assembly, the state board promulgates emergency rules and re-submits to the General Assembly for review.
quality of instruction and improve student achievement is described more fully under 3.A.ii.

**Evidence of the adoption of the guidelines.**
Evidence of the adoption of the guidelines can be found in Appendix 6 (SB 10-191) and Attachment 11 (rules that have been adopted by the State Board of Education on November 9, 2011). Additional evidence is also available in the State Council’s for Educator Effectiveness’ Report and Recommendations to the State Board of Education. A summary and a full report of those recommendations are available on the CDE website: [http://www.cde.state.co.us/EducatorEffectiveness/Partner-SCEE.asp](http://www.cde.state.co.us/EducatorEffectiveness/Partner-SCEE.asp).

### Description of Pilot, Partner and Integration Sites

**Evaluation Pilot Sites:** Pilot districts were selected as part of CDE’s work to implement Senate Bill 10-191. The cohort represents districts of the various sizes, student demographics and geographic differences across Colorado. These pilot school districts will provide valuable feedback on the quality of the model system, identify challenges and strengths of the system, and suggest refinements to the implementation process developed by CDE.

**Partner Districts:** Partner districts that were selected to participate in the pilot process have already developed local performance evaluation systems that reflect key elements of the legislation. These districts will provide valuable information on the process for aligning existing educator evaluation systems to the rules developed by the State Board of Education, as well as provide an opportunity to enhance the model system with elements from locally-developed systems.

**Integration Districts:** These Districts were selected through the Colorado Legacy Foundation (a non-profit focused on innovation in public schools) to examine the interaction of implementing SB 10-191 and the new Colorado Academic Standards. The initiative includes:
- Colorado Academic Standards and aligned instructional materials to guide instruction
- Professional development in formative practices to inform instruction
- Regular performance evaluations that hold educators accountable for student growth and provide them feedback to improve instruction.

**CDE Educator Identifier District Pilot:** Colorado has created a student and educator identifier. To create a teacher-student data link, the state is beginning to pilot a state common course code system and the identification of educators of record. CDE Evaluation Pilot Districts, CDE Evaluation Partner Districts and Foundation Integration Districts will also be asked to participate in the Educator Identifier Pilot project.

### Description of the process the SEA used to involve teachers and principals in the development of these guidelines.

Stakeholders have had four avenues to help shape the requirements and processes associated with the initiative through the: (1) public comment opportunities as SB 191 was being crafted; (2) through the State Council of Educator Effectiveness; (3) public comment opportunities as the rules have been written; and (4) the pilot of the State Model System.

Over the past year, Colorado has maintained a delicate balance of creating a thoughtful process while accelerating the design and implementation phases. Pursuant to SB 10-191, the Governor appointed the 15-member State Council for Educator Effectiveness. The council has broad representation including teachers, administrators, a parent, a student, local school board members and others. After several months of studying and wrestling with the issues, the council reached consensus on recommendations to the state on how to implement the educator effectiveness system. The Council’s meetings were all open to the public and many meetings were devoted to public input and hearings.

CDE drafted rules based on the State Council for Educator Effectiveness recommendations, and then sought input on the draft from the public, districts, education associations and other stakeholders. Input was provided during three
formal public hearings before the State Board of Education, as well as many other public meetings and focus groups. The rules, reflecting changes made as a result of that input, were adopted by the State Board of Education on November 9, 2011.

The final way that stakeholders may shape the guidelines used by the state to implement SB 10-191 is through the pilot process. In partnership with teachers, principals and superintendents in selected districts, the rules will be revisited after the field testing to reflect “lessons learned” during the pilot. The full set of legal requirements, evaluation decisions and expectations will take effect in 2014-2015.

Under state law, districts may choose to adopt the State’s Model Evaluation or provide evidence of a system that meets or exceeds the requirements of the law. This ensures that all systems are rigorous while providing for local control and discretion. SB-191 also required CDE to design a model system that is sensitive to the needs of districts that are early implementers. During summer 2011, CDE released an application to districts to join the pilot process to test of State model system of evaluation for 2011-12 and 2012-13. There was overwhelming interest from the field. Considering geographic location, size of district and readiness, CDE selected 27 “pilot” and “partner” districts (see map below). This effort is helping the state to learn and make necessary mid-course corrections during the two-year pilot phase of the state model evaluation system.

Additional sites were selected by the Colorado Legacy Foundation (a partner organization that supports several of CDE’s big initiatives) to run integration sites. As a part of all of this work, all evaluation pilot, partner, and integration sites are also required to participate in the piloting of the state’s new educator identifier project (phase III: common course codes and linking student-teacher data).
3.A.ii For any teacher and principal evaluation and support systems for which the SEA has developed and adopted guidelines, consistent with Principle 3, are they systems that meet the specified waiver criteria?

Colorado’s educator evaluation system meets all of the waiver elements in this Principle (3Aii a-f). The elements have been cross-walked in the chart at the end of this section with Colorado evaluation law (SB 10-191) and the rules. It should also be noted that the state is currently piloting all of these elements with a wide range of districts to ensure that they system is detailed and effective. Changes will be made to the rules upon conclusion of the pilot process in 2013.

a. Colorado’s Educator Evaluation System will be used for continual improvement of instruction.

This is a major tenet of the new system. While the law and rules (see chart at the end of this section for citations) lay out expectations for the state and districts about the focus on improving instruction, the pilot work is actively checking to ensure that the system supports this work. School districts will be required to collect and analyze data on multiple occasions, in order to provide actionable feedback and
support to educators on a regular basis, and in order to make evaluation an ongoing process rather than an event. (Section 5.01 (F) (3) of 11.2.11 draft rules.)

Principal Standard II in the new state system is Instructional Leadership. This standard articulates how principals are to lead and support instructional improvements in their buildings. In addition to being held accountable to Standard II, Principals will also be held accountable for progress against goals laid out in the principal's Professional Performance Plan and districts will continually monitor principal performance goals, provide feedback, and adjust support for the principal as needed. (Section 5.01 (H) (2) of 11.2.11 draft rules.)

The Colorado Department of Education will monitor district implementation of local evaluation systems, by collecting data that includes information about the number of educators assigned to each performance evaluation rating, retention rating correlated with performance evaluation ratings, and student performance outcomes correlated to performance evaluation ratings. (Section 6.04 (C) of 11.2.11 draft rules.) CDE may integrate information about evaluation systems into accountability and improvement efforts, including, if applicable, the school and district performance reports, and may incorporate monitoring data into the school and school district unified improvement plans. (Section 6.04 (B) of the 11.2.11 draft rules.)

b. Colorado's Educator Evaluation System meaningfully differentiate performance using at least three performance levels.

Colorado has designed a system that incorporates four performance level ratings for educators: ineffective, partially effective, effective and highly effective. While we are still determining the exact definitions of the four final rating levels that will be used when both the professional practice (50% of final evaluation rating) and student growth (50% of final evaluation rating) comes together, we do have definitions of rating levels describing the principal’s performance on professional practices with respect to state performance standards. These levels are very rigorous. The five levels are:

- **Not Evident:** Principal/Assistant Principal does not meet state performance standard and does not demonstrate progress toward meeting standard.
- **Partially effective:** Principal/Assistant Principal does not meet state performance standard but is demonstrating progress toward meeting standard.
- **Proficient:** Principal meets state performance standard.
- **Accomplished:** Principal exceeds state standard.
- **Exemplary:** Principal significantly exceeds state standard.

We expect less than 5 percent of principals to be able to achieve the exemplary rating—especially in the first several years of the system. It is a very high bar to meet.
c. Colorado’s Educator Evaluation System will use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys).

Colorado’s system identified definitions of effective teachers and principals are further defined by seven quality standards. The standards outline the basis for the two major teacher and principal measures – professional practice and student growth. S.B. 10-191 sets forth several requirements that reflect the state’s commitment to creating a meaningful evaluation system:

- Districts must adopt measures of effectiveness and processes that ensure systematic data collection
- At least 50 percent of a teacher’s evaluation must be based on measures of student academic growth
- Multiple measures must be used to evaluate teacher performance
- Data must be gathered with sufficient frequency to provide a basis for the evaluation

**Statewide Definition of Teacher Effectiveness.** Effective Teachers in the state of Colorado have the knowledge, skills, and commitments needed to provide excellent and equitable learning opportunities and growth for all students. They strive to support growth and development, close achievement gaps and to prepare diverse student populations for postsecondary and workforce success. Effective Teachers facilitate mastery of content and skill development, and employ and adjust evidence-based strategies and approaches for students who are not achieving mastery and students who need acceleration. They also develop in students the skills, interests and abilities necessary to be lifelong learners and engage in democratic and civic participation. Effective Teachers communicate high expectations to students and their families and utilize diverse strategies to engage them in a mutually supportive teaching and learning environment. Because Effective Teachers understand that the work of ensuring meaningful learning opportunities for all students cannot happen in isolation, they engage in collaboration, continuous reflection, on-going learning and leadership within the profession.

**Teacher Quality Standards**

- Quality Standard I: Teachers demonstrate mastery of and pedagogical expertise in the content they teach.
- Quality Standard II: Teachers establish a safe, inclusive and respectful learning environment for a diverse population of students.
- Quality Standard III: Teachers plan and deliver effective instruction and create an environment that facilitates learning for their students.
- Quality Standard IV: Teachers reflect on their practice.
- Quality Standard V: Teachers demonstrate leadership.
- Quality Standard VI: Teachers take responsibility for Student Academic Growth.
**Statewide Definition of Principal Effectiveness:** Effective Principals in the state of Colorado are responsible for the collective success of their schools, including the learning, growth and achievement of both students and staff. As the school’s primary instructional leader, effective principals enable critical discourse and data-driven reflection about curriculum, assessment, instruction, and student progress, and create structures to facilitate improvement. Effective Principals are adept at creating systems that maximize the utilization of resources and human capital, foster collaboration, and facilitate constructive change. By creating a common vision and articulating shared values, effective principals lead and manage their schools in a manner that supports the school’s ability to promote equity and to continually improve its positive impact on students and families.

Principal Quality Standards
- Standard I: Principals demonstrate strategic leadership.
- Standard II: Principals demonstrate instructional leadership
- Standard III: Principals Demonstrate School Cultural and Equity Leadership
- Standard IV: Principals Demonstrate Human Resource Leadership
- Standard V: Principals Demonstrate Managerial Leadership
- Standard VI: Principals Demonstrate External Development Leadership
- Standard VII: Principals Demonstrate Leadership around Student Growth

In the State Model Evaluation system that is currently being piloted, several examples (e.g., survey data) of evidence are offered to support demonstration of the quality standards. Below is a flowchart of how the system is ultimately envisioned (based the SCEE’s recommendation). This chart is also included in Attachment 10.

![Flowchart of Framework for System to Evaluate Principals](image-url)
d. Colorado's Educator Evaluation System will require the evaluation of teachers and principals on a regular basis.

Educators are now required to receive an evaluation on a regular basis to provide enough data to draw fair and consistent results, with observations and evaluative discussions required at least twice per year. At a minimum, teachers and principals must be evaluated annually. Furthermore, novice or partially proficient teachers should be observed at least twice annually.

e. Colorado's Educator Evaluation System will provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development.

Because the state educator evaluation system is built upon a continuous improvement cycle, professional development is considered an important step in the cycle. Within the law and the rules, educators are expected to receive access to professional development identified in the growth plan. The focus is on improving effectiveness. The Colorado Department of Education will monitor district implementation of local evaluation systems by collecting data that includes perception survey data and information about the extent to which educators understand how they are being evaluated, what they need to do to improve, and how to access resources they need to support their professional development. (Section 6.04 (C) of 11.2.11 draft rules.) Principal professional performance plans must include goals addressing school climate and working conditions, developed with reference to a working conditions or school leadership survey. The intent is that this process will allow educators to give feedback on the professional development they receive and will help principals monitor and ensure that educators have access to appropriate and high quality professional development. (Section 5.01 (H) (3) (b) of 11.2.11 draft rules.)

f. Colorado's Educator Evaluation System will be used to inform personnel decisions.

Beginning with evaluations conducted during the 2013-14 school year, probationary Teachers rated "ineffective" will not accrue a year of service toward nonprobationary status. Beginning with evaluations conducted during the 2014-15 school year, a nonprobationary Teacher who is rated as ineffective for two consecutive years will lose nonprobationary status.
<table>
<thead>
<tr>
<th>Table 21. Crosswalk of 3Ai (a-e) Elements with Colorado law and State Rules for Educator Evaluation System</th>
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<tr>
<td>Will be used for continual improvement of instruction?</td>
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<tr>
<td>Location in Legislation (SB 10-191)</td>
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<tr>
<td>22-9-201(1)(b)(l) on p. 2</td>
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<td>5.01 (A) (1) on p. 12</td>
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<td>5.01 (H) (2) on p. 20</td>
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<td>6.04 (B) and (C) on p. 27</td>
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<td>Meaningfully differentiate performance using at least three performance levels?</td>
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<td>22-9-105.5(1)(a) on p. 8</td>
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<td>22-9-105.5(3)(a) on p. 7</td>
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<td>22-9-106(7) on p. 23</td>
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<tr>
<td>2.03 on p. 7</td>
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<td>3.03 on pp. 10-12</td>
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<td>Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?</td>
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<td>22-9-105.5(3)(a) on p. 7-8</td>
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<td>5.01(E)(2) - (3) on pp. 13-16</td>
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<td>5.01(E)(6) - (8) on pp.17-19</td>
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<td>Evaluate teachers and principals on a regular basis?</td>
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<td>5.01(F)(1) and (2) on p. 19</td>
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<tr>
<td>Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?</td>
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<td>5.01(H) on pp. 20-21</td>
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<td>Will be used to inform personnel decisions?</td>
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3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.

Colorado’s educator evaluation system meets all of the waiver elements in Principle 3B. The elements have been cross-walked in the chart at the end of this section with Colorado state rules. It should also be noted that the state is currently piloting all of these elements with a wide range of districts to ensure that they system is detailed and effective. Changes will be made to the rules upon conclusion of the pilot process in 2013.

Process for reviewing and approving an LEA’s teacher and principal evaluation and support systems to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems.

CDE is expected to play a monitoring role in the implementation of the educator evaluation system to ensure that educators receive adequate feedback and professional development support to provide them a meaningful opportunity to improve their effectiveness. SB 10-191 authorized the SEA to develop a model evaluation system for Principals and Teachers. The legislation recognizes the need for LEA flexibility in a state that values local control. Through the rules promulgation process the state is clarifying the degree of LEA flexibility to create locally, or purchase, evaluation systems that evaluate the state standards for teachers and principals. This process must be informed by councils, validated, and cross-walked to the State system for comparability of data reporting.

Beginning in July 2013, CDE will collect an assurance from each school district and BOCES no later than July 1 of each year, indicating that the school district or BOCES is either implementing the state model system or is implementing its own distinctive personnel evaluation system that satisfies the requirements in section 5.01 of the SB 191 rules. These assurances shall be signed by (i) the executive director of the BOCES or superintendent of the School District, and (ii) the chair of the BOCES or local school board. CDE is considering requiring the following assurances and information:

1. Submit information concerning how to access the school district’s or BOCES written evaluation system, required by section 22-9-106 (1), C.R.S.

2. Submit an explanation of how the District’s Personnel Evaluation System is aligned with the purposes stated in 5.01(A).

3. Submit an explanation of how each Licensed Personnel (defined in section 1.06) in the District is being evaluated according to statewide definitions of Teacher of Record, Contributing Professional, and Principal as defined.
4. Submit an assurance that the school district or BOCES is using the state’s quality standards for principals and teachers, or using locally developed standards that meet or exceed the state quality standards, as required by SB 191 rules, sections 2.02 and 3.02.
   o If using locally developed standards, attach crosswalk of those standards to the state standards. Affirm that the school district or BOCES will report data for each principal and teacher using one of the 4 statewide performance evaluation ratings and according to each state quality standard.

5. Submit an assurance that the school district or BOCES is using the state’s framework and decision-making structure for assigning performance evaluation ratings, or using a modified framework and decision-making structure, as required by SB 191 rules, sections 2.03 (A) – (B) and 3.03 (A) – (B).
   o If using locally developed framework and decision-making structure, attach a summary or visual describing that system.

LEAs may adopt the state’s model evaluation system. Colorado is now in the process of creating a model system that (1) reflects input from teachers and principals, (2) is validated, and (3) is continuously improved. Pilot district sites are receiving training on the system, including the rubric to evaluate principals and assistant principals. The teacher rubric has been drafted and will be part of the pilot next year.

Resources and training modules are available on the CDE website:
http://www.cde.state.co.us/EducatorEffectiveness/RB-CDEModelEvaluationSystem.asp

Process to ensure that all measures used in an LEA’s evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA.

Upon full implementation (2013), this will be a part of the monitoring process described above. In the meantime, the state is focusing on developing options for offering valid, reliable measures of student growth in state tested and non-tested grades and subjects. This is occurring primarily through two mechanisms: (1) the content collaborative and (2) the evaluation pilot process.

The content collaborative initiative, described previously in Principle 1, will also develop and vet appropriate measures for the evaluation process. By pulling from local and national expertise, content area teams are being created to design, structure and run a peer review process of effectiveness measures. The pilot sites are also being tapped to provide data to support this work. Below is a sample of the data collection agreement with pilot sites. In addition, the current rules require that districts that chose to use their own evaluation system must outline the process they use for validating the multiple measures of student growth in their system.
DATA COLLECTION AND SUBMISSION EXPECTATIONS FOR PILOTS

Pilot Participant agrees to:

- Provide copies of all evaluation materials and other data identified below to CDE as part of the pilot data collection process.
  - Copies of:
    - Self assessments of all participating evaluatees
    - Evaluator assessments of evaluatee
    - Yearly process tracking form of evaluator
    - Professional development opportunities and information
    - Other supporting documents for the evaluation
- Submit data in an electronic format to CDE no later than April 15, 2012.
- Take precautions to ensure that the data transmission is secure to the extent reasonably possible.

At a minimum, this includes the following information/data to CDE as part of the pilot data collection process.

Ongoing each year

- Feedback on surveys, focus groups, rubrics, questionnaires, etc. that will provide CDE input on the technical aspects of the state model system, as well as information related to the feasibility and implementation of the system; (CDE will contact you for possible times for interviews)
- Student and educator data to include: Educator IDs, course IDs, section IDs, associated SASIDs, year, associated CSAP subject area where applicable, teacher demographic data (where available), and other appropriate data. (CDE will pull this from existing collections if possible)

September – October: Baseline Data- Every Pilot Year

- Perceptual data for all principals and teachers participating on the pilot; Pre and post implementation. (Sept. or Oct. the beginning of each pilot year, CDE will send surveys out to you)
- Achievement and outcome data for the district; (Sept. or Oct. the beginning of each pilot year) (CDE will pull from existing collections)

Beginning in Year 2- September – October

- Student achievement data that is linked to teachers beginning in the 2012-13 school year

Plan to ensure that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year.

The State Model Evaluation is being piloted during the 2011-12 and 2012-13 school years. The 27 pilot districts have signed MOU’s with CDE agreeing to the timelines set forth in the Pilot Timeline document.
The following is an excerpt from the signed MOU for CDE and pilot districts:

District/BOCES is expected to:

- Evaluate principals during the 2011-2012 academic year using the state model system, and to provide feedback on the teacher evaluation instruments and system during the 2011-2012 academic year.
- Implement both the principal and teacher evaluation processes during the 2012-13 and 2013-14 school years, and to provide information and feedback requested by CDE.
- Allow educators participating in the pilot to take part in interviews and focus groups designed to determine needed changes and to gather ideas for improvement of the system during the spring of 2012 and ongoing.
- Collect and report data to CDE about the pilot process and selected outcomes for a 5-year period from 2011-2016.

CDE Responsibilities:

1. CDE will use the data provided by the Participants to conduct research related to the technical adequacy and usefulness of the state model educator evaluation system. CDE agrees that no Participant data or information, including but not limited to student, teacher, school, or district data, collected or viewed by CDE, or provided by Participant or otherwise obtained, will be used for any other purposes beyond the evaluation of the above named project.

2. CDE will ensure that data received from Participant is stored securely, with access limited to authorized staff and/or contractors.
District Implementation Timeline

**February 2011:** Districts should review personnel evaluation systems to ensure compliance with statutory and state board requirements and prepare for implementation of additional requirements. During this year, CDE will gather information about current evaluation systems and best practices and develop a resource bank for all districts and schools. Statutory requirement timelines include:

- Probationary teachers must receive at least two documented observations and one evaluation that results in a written evaluation report each academic year and must receive the written evaluation at least two weeks before the last class day of the school year.
- No person shall be responsible for the evaluation of licensed personnel unless the person has a principal or administrator license or is a designee of a person with a principal or administrator license and has received education and training in evaluation skills approved by CDE that will enable him or her to make fair, professional, and credible evaluations.
- A teacher or principal whose performance is deemed to be “unsatisfactory” must be given notice of deficiencies. A remediation plan to correct the deficiencies must be developed by the district and the teacher or principal and must include professional development opportunities that are intended to help the teacher or principal to achieve an effective rating in his or her next performance evaluation.

**2011-2012:** CDE will work with districts and BOCES to assist with the development of performance evaluations systems that are based on the quality standards promulgated in the rules. CDE will provide a resource bank that identifies assessments, processes and tools that a district or BOCES may use to develop their evaluation system.

**2012-2013:** The new state-developed performance evaluation system based on the quality standards will be piloted by 15 districts across the state.

Plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation.

The State is using the pilot process as a way to determine future technical assistance supports. Currently, all pilot districts receive multiple site visits and trainings from CDE staff on the principal evaluation and teacher evaluation systems. CDE will visit pilot districts at least twice per year to provide technical assistance on system roll out. The technical assistance will focus on understanding the professional practice standards, rubric scoring, proper weighting of the different elements of the system, proper observation protocols, and change management strategies in the district.
Pilot is broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA’s evaluation and support systems.

The model evaluation system will be implemented over a four-year period, with development and beta-testing activities beginning in 2011 and full statewide implementation in place by May 2015. The design of this pilot and rollout period is intended to capture what works and what doesn’t (and why), and provide multiple opportunities to learn from failure and to spread success. In that spirit, the state will monitor and act on the following:

- How well the model evaluation system addresses the purposes as articulated in S.B. 10-191
- What school districts do that works or does not work
- What other states do that works
- Changes in assessment practice and tools expected over the next few years, especially with respect to student growth, and
- Emerging research and best practice findings with respect to educator evaluations.

Pilot sites were selected on a variety of factors to ensure a representation of the state. The pilot test incorporates all of the activities involved in developing the evaluation (including direct feedback from superintendents, principals and teachers in the pilot sites) up to and including the first two roll-out years for the teacher and principal systems. This school year, CDE will conduct a “beta test” of both systems to determine the quality, relevance, utility, credibility, and usability of the systems for principals and teachers. The purpose of this year’s work is to determine whether changes are needed before the all important validation study, which will be conducted for both systems in 2012-13 (next school year). Both systems will be rolled out statewide during the 2013-14 school year.

For more details on the way stakeholders feedback is incorporated in the pilot process, see the description in 3Aii. Included in that section is a map of the pilot sites to show the distribution of sites.
## Table 22. Crosswalk of Waiver 3B Elements with Colorado’s State Rules for Educator Evaluation System

<table>
<thead>
<tr>
<th>Process for reviewing and approving an LEA’s teacher and principal evaluation and support systems to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems.</th>
<th>6.04</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals.</td>
<td>5.02(A) 5.02(E) 5.02(G)</td>
</tr>
<tr>
<td>Process to ensure that all measures used in an LEA’s evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA.</td>
<td>5.01 (F) (3) (f) 5.01 (F) (7) 5.01(H) 6.04</td>
</tr>
<tr>
<td>Plan to ensure that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year.</td>
<td>5.01(F) 6.04</td>
</tr>
<tr>
<td>Timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines.</td>
<td>6.03</td>
</tr>
<tr>
<td>Plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation.</td>
<td>2.03 (C) 3.03 (C) 5.01 (F) (2) (b) 5.01 (F) (6) - (7) 6.01 (D) 6.02</td>
</tr>
<tr>
<td>Pilot is broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA’s evaluation and support systems.</td>
<td>6.03(B)</td>
</tr>
</tbody>
</table>
Attachment A: Optional Flexibility Request

Consultation. Describe the process by which the SEA consulted with stakeholders on the amendment request, including teachers and their representatives, local educational agencies (LEAs), parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. An SEA should indicate any changes it made to its amendment request as a result of this consultation and attach to the amendment request any comments that it received from LEAs in response to the consultation process.

CDE published the draft of the amendment for public comment on October 23, 2012. To solicit feedback, targeted outreach occurred to enlist input from school and local education agencies administrators, extend learning time program officials, Colorado 21st Century Community Centers grantees and dropout prevention programs. In addition, the NCLB Committee of Practitioners (CoP) was consulted on the 21st CCLC amendment during their meeting held on November 7, 2012. After discussion, the CoP made a motion that passed in support of CDE moving forward with the 21st CCLC amendment to the waiver. The attached public comments were generally supportive of the amendment, with only one commenter expressing opposition to the waiver amendment. The commenter gave two reasons and CDE has addressed both by strengthening the waiver application in response to his points. First, the commenter felt that schools would use the funding to make up for other budget cuts. That use of funds would violate federal law and CDE has made clear that the 21st Century Community Learning Center program requirement that federal funds be used to “supplement, not supplant” other state and local funds will be enforced. (see pg. 118)

Second, based on personal experience struggling to build effective partnerships for afterschool programs, the commenter was concerned that using 21st Century funds for expanded-time schools would undermine these valuable partnerships. CDE agrees with the commenter on the importance of promoting strong school-community partnerships and believes that they are an important part of the design of high-quality expanded learning time schools. The flexibility created by the waiver will allow for the expansion of those partnerships, permitting 21st Century grant funded activities provided by outside partners to be integrated into an expanded school day and delivered to more students instead of being relegated exclusively to non-school hours. CDE addressed the importance of partnerships in its definition of high-quality expanded time schools – as did the U.S. Department of Education, in its waiver guidance material – and we have further strengthened the language in response to the comment. (see pg. 18)

Finally, commenters called for guidance or asked questions on a few points that are already directly addressed by the amendment application and waiver guidelines and do not require modification to the application itself. To clarify them here: the expanded time cannot be used for “more of the same;” the application lays out several of the specifics of how a high-quality expanded time school would have to use time differently (page 17). Personalization is another important aspect of expanded time schools and high-quality schools succeed by creating student-centered learning environments. Finally, the flexibility to deliver some portions of a 21st Century afterschool program’s services within school hours, which is currently rigidly prohibited, would be allowed within the context of an expanded time school that significantly expanded its total hours for all students.
October 23, 2012

Notice Inviting Public Comment
Colorado ESEA Waiver: Requesting Flexibility Option for the 21st Century Community Learning Centers Grant Program

The Colorado Department of Education (CDE) intends to submit a request to amend the state’s Elementary and Secondary Education Act (ESEA) waiver to include the flexibility option related to the 21st Century Community Learning Centers (21st CCLC) grant program. The request will be submitted to the United States Department of Education (USDE) by November 15, 2012.

The amendment to the state’s ESEA waiver is needed to allow Colorado the flexibility to leverage 21st CCLC resources in supporting expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session. The flexibility option, as stated in the USDE’s waiver application, specifically waives the requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center, under the 21st CCLC program, to activities provided only during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). The state’s request is not intended to impact current 21st CCLC subgrantees.

CDE invites public comment on this request. Students, parents, schools, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, businesses, and Indian tribes are encouraged to consider CDE’s request for a waiver amendment and provide feedback.

Please submit comments by 4:00 pm on Friday, November 9, 2012. To make a comment, send an email with the subject line - Waiver Request, to Katy Jackson at jackson_katy@cde.state.co.us. Public comments will be included in the state’s request to the USDE.

A draft of the amendment request and additional information will be posted on CDE’s 21st CCLC webpage, www.cde.state.co.us/21stCCLC/index.htm. If you have questions regarding CDE’s request for a waiver amendment, please contact Tom Denning, State Coordinator for the 21st CCLC Grant Program: Phone: 303-866 -6791, Email: denning_t@cde.state.co.us.
Attachment A: Optional Flexibility Request

Notice Inviting Public Comment

Website Posting:

The 21st Century Community Learning Centers (21st CCLC) competitive grant program is authorized under Title IV, Part B, of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001. The purpose of this important program is to establish or expand community learning centers that provide students, particularly those who attend high-poverty and low-performing schools, with academic enrichment opportunities along with activities designed to complement the students’ regular academic program. Community learning centers must also offer families of these students literacy and related educational development.

Centers, which can be located in elementary or secondary schools or other similarly accessible facilities, provide a range of high-quality services during non-school hours or periods when school is not in session (such as before and after school, or during summer breaks). These services support student learning and development and may include: tutoring/mentoring, homework help, academic enrichment (such as hands-on science or technology programs), community service opportunities, as well as music, arts, sports and cultural activities.

Local Education Agencies (LEAs) and public or private organizations are eligible to apply for a 21st CCLC grant.

For additional information please contact Tom Derning at derning_t@ctde.state.co.us or 303.866.6791.

Notice Inviting Public Comment
Colorado ESEA Waiver: Requesting Flexibility Option for the 21st Century Community Learning Centers Grant Program

Deadline: Friday, November 9th, 2012

The Colorado Department of Education (CDE) intends to submit a request to amend the state’s Elementary and Secondary Education Act (ESEA) waiver to include the flexibility option related to the 21st Century Community Learning Centers (21st CCLC) grant program. The request will be submitted to the United States Department of Education (USDE) by November 15, 2012.

CDE invites public comments and concerns on this request. Please submit comments by 4:00 pm on Friday, November 9, 2012.

To make a comment, send an email with the subject line - Public Comment ESEA Waiver, to Katy Jackson at jackson_katy@cde.state.co.us.
Attachment A: Optional Flexibility Request

Note: Public comments will be included in the state’s request to the USDE.

If there are questions regarding CDE’s request for a waiver amendment, please contact Tom Denning, State Coordinator for the 21st CCLC Grant Program:
Phone: 303-866-6791
Email: denning_t@cde.state.co.us.

Documents:
*FAQ re: 21st CCLC Waiver - pdf
Non-regulatory Guidance for 21st CCLC - pdf
Invite for 21st CCLC Public Comment - pdf
Draft Amendment Request – pdf

*Copy of this document is provided below

**Elementary and Secondary Education Act Waiver: 21st CCLC Flexibility Option**

**FREQUENTLY ASKED QUESTIONS**

*FAQs from different guidance documents the United States Department of Education issued in the past year related to the 21st Community Learning Centers (CCLC) flexibility option.*

**EXPANDED LEARNING TIME**

**B-24. What does this flexibility include with respect to expanded learning time?**

Under this flexibility, an SEA (State Education Agency) may request flexibility to permit its LEAs (Local Education Agencies) to use funds for community learning centers under the 21st CCLC program to support activities that provide high-quality expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session (*i.e.*, before and after school or during summer recess).

**B-25. What does high-quality expanded learning time look like?**

Supporting activities to provide high-quality expanded learning time might include: Adding significantly more time by expanding the school day, school week, or school year to increase learning time for all students;

Using the additional time to support a well-rounded education that includes time for academics and enrichment activities;
Providing additional time for teacher collaboration and common planning; and Partnering with one or more outside organizations, such as a nonprofit organization, with demonstrated experience in improving student achievement.

***

February, 2012 updates:

**B-24. What does this flexibility include with respect to expanded learning time?**
Under this flexibility, an SEA may request flexibility to permit an eligible entity to use funds under the 21st CCLC program to provide activities that support high-quality expanded learning time during an expanded school day, week, or year in addition to activities during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). (Modified February 10, 2012)

**B-24a. How does ESEA flexibility affect the 21st CCLC program?**

At an SEA’s (State Education Agency’s) option, the flexibility allows for an additional use of funds for the 21st CCLC program — to provide activities that support high-quality expanded learning time. Expanded learning time is the time that an LEA (Local Education Agency) or school extends its normal school day, week, or year to provide additional instruction or educational programs for all students beyond the State-mandated requirements for the minimum number of hours in a school day, days in a school week, or days or weeks in a school year. Because the 21st CCLC statute restricts the use of program funds to support a broad range of academic enrichment and other activities during “non-school hours or periods when school is not in session,” and expanded learning time is, by definition, an extension of the normal school day, week, or year, an SEA would need the optional ESEA flexibility waiver to allow a 21st CCLC subgrantee to use 21st CCLC funds for activities that support expanded learning time.

With the exception of carrying out 21st CCLC activities during an expanded school day, week, or year, an eligible entity in a State that receives a waiver must comply with all other 21st CCLC requirements. In other words, other provisions of the 21st CCLC program remain unchanged, including the allocation of funds to SEAs by formula, the requirement that SEAs use 95 percent of their State formula grants to make competitive subgrants, and the entities eligible to compete for those subgrants (which consist of LEAs, community-based organizations, other public or private entities, and consortia of those entities). In a State that has been approved to implement ESEA flexibility, and that has requested the optional flexibility for the 21st CCLC program, eligible entities may submit applications to the SEA for activities that support expanded learning time and/or to operate programs before and after school and during summer recess as allowed under current requirements. For more information on the 21st CCLC program, please refer to ESEA sections 4201-4206 and the February 2003 non-regulatory guidance [available at http://www2.ed.gov/programs/21stcclc/guidance2003.pdf]. (Added February 10, 2012)

**B-24b. When would ESEA flexibility for 21st CCLC funds take effect?**

ESEA flexibility would not affect current 21st CCLC subgrantees. Rather, this flexibility would take effect for local competitions conducted after an SEA receives ESEA flexibility. Thus, when an SEA runs its next 21st CCLC competition following the receipt of ESEA flexibility, it may solicit applications from eligible entities to provide activities that support high-quality expanded learning time in addition to activities conducted during non-school hours or periods when school is not in session. (Added February 10, 2012)

**B-24c. What are some examples of ways an eligible entity might use 21st CCLC funds to provide activities that support expanded learning time?**

An eligible entity in a State that has been approved to implement ESEA flexibility (and has requested the optional flexibility for the 21st CCLC program) may use 21st CCLC funds to provide activities that support high-quality expanded learning time. The 21st CCLC activities may be carried out at any point in time during an
extended school day, week, or year. For example, if an LEA (Local Education Agency) lengthens its school day beyond the State minimum, the LEA or another eligible entity might use 21st CCLC funds to provide supplemental science, reading, civics, or art instruction or other supplemental academic enrichment activities to students in the morning or afternoon to allow teachers time to collaborate or plan. Similarly, an LEA working with a community partner, might use 21st CCLC funds to extend its school week and incorporate enrichment activities, such as debate or college preparation, on either Saturday or a week day. Using 21st CCLC funds to support expanded learning time should not be just “more of the same”; it should involve careful planning by the eligible entity to ensure that the programs or activities will be used to improve student achievement and ensure a well-rounded education that prepares students for college and careers. (Added February 10, 2012)

B-24d. Does the 21st CCLC supplement, not supplant provision apply to the use of 21st CCLC funds to support expanded learning time under ESEA flexibility?

Yes, the 21st CCLC supplement, not supplant provision applies to the use of 21st CCLC funds to support expanded learning time under ESEA flexibility. Thus, an SEA (State Education Agency) receiving a waiver to permit an eligible entity to use 21st CCLC funds to provide activities that support expanded learning time programs must ensure that the 21st CCLC funds are used to supplement, and not supplant, Federal, State, local, or other non-Federal funds that, in the absence of the 21st CCLC funds, would be made available for programs and activities authorized under the 21st CCLC program (ESEA 4203(a)(9) and 4204(b)(2)(G)). (Added February 10, 2012)

Provided by: Federal Policy and National Partnerships/National Center on Time & Learning October 2012

Scoop Announcement:
Innovation & Choice

** Requesting Public Comment for ESEA Waiver Amendment 21st Century Community Learning Centers

CDE seeks to amend the state's ESEA waiver related to the 21st Century Community Learning Centers grant program. The amendment will allow CDE to waive the requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities supported by the 21st CCLC grant program.

The flexibility waiver will allow CDE to leverage 21st CCLC funding to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session. The waiver request is not intended to impact current 21st CCLC grantees.

Written comments will be accepted through Nov. 9 and be included in the waiver amendment application.

Click Here for Additional Information

For More Information, Contact:
Katy Jackson
Dropout Prevention and Student Engagement
Phone: 303-866-6679
Email: jackson_katy@cede.state.co.us

Review Two New Online Studies

Two online studies, "A Study of ONLINE LEARNING: Perspectives of Online Learners and Educators" and "Characteristics of Colorado's Online Students" are available for review.

Click Here for Additional Information

For More Information, Contact:
Amanda Heiney
Office of Online & Blended Learning
Phone: 303-866-6897
Email: heiney_a@cede.state.co.us

News & Notes

Join the Concurrent Enrollment Advisory Board

CDE is accepting nominations for the concurrent enrollment advisory board. For information about the board and their responsibilities, visit the link below. Interested parties should
This invitation was sent to the Dropout Prevention and Student Engagement Unit and the unit’s perspective lists, including 21st Century subgrantees, Expelled and At-Risk Student Services, the Service Learning Council, the NCLB Committee of Practitioners, and the Literacy Foundation. State Coordinator, Tom Denning, also contacted the Colorado Out of School Time Organization. The information about this waiver was also shared at the CAQSA P Leadership Conference October 19, 2012.

From: Jackson, Katy
To: Denning, Tom; Carrillo, Erin; Fritz, Peter; Jackson, Katy; Krueger, Janelle; Martinez, Judith; McGrath, Marilyn; Ruthven, Marti; Scott, Dana; Conyers, Sherree; Walz, Tricia; Steinhoff, Lynnette
Subject: Request: Public Comment on Colorado ESEA Waiver Regarding 21st CCLC
Date: Thursday, November 08, 2012 2:39:09 PM

Dear Dropout Prevention & Student Engagement Team Members,

Please help us spread the word to your contacts that CDE is requesting public comment on a pending ESEA waiver amendment. Attached and below is an invitation, please forward as appropriate. Thank you,
Tom Denning

Notice Inviting Public Comment
Colorado ESEA Waiver: Requesting Flexibility Option for the 21st Century Community Learning Centers Grant Program

The Colorado Department of Education (CDE) intends to submit a request to amend the state’s Elementary and Secondary Education Act (ESEA) waiver to include the flexibility option related to the 21st Century Community Learning Centers (21st CCLC) grant program. The request will be submitted to the United States Department of Education (USDE) by November 15, 2012.

CDE invites public comments and concerns on this request. Please submit comments by 4:00 pm on Friday, November 9, 2012.

To make a comment, send an email with the subject line - Public Comment ESEA Waiver, to Katy Jackson at jackson_katy@state.co.us.

Note: Public comments will be included in the state’s request to the USDE.

If there are questions regarding CDE’s request for a waiver amendment, please contact Tom Denning, State Coordinator for the 21st CCLC Grant Program:
Phone: 303-866-6791
Email: denning_t@cde.state.co.us.

For more information, visit http://www.cde.state.co.us/21stCCLC/.

Thank you,

Katy Jackson
Program Support Assistant
Dropout Prevention and Student Engagement Unit
Colorado Department of Education
Email Comments
The following emails were received during the public comment period

From: Melanie Dressman
To: Jackson, Katy
Subject: Public Comment ESEA Waiver
Date: Monday, November 05, 2012 1:45:38 PM

Katy,
i support the amendment to the state's ESEA waiver to allow Colorado the flexibility to leverage 21st CCLC resources in supporting expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session. This would allow many opportunities for ELL students and students of poverty.
Thank you!

Melanie Dressman
Grants Coordinator/Homeless Liaison
Englewood Schools
303-806-2008
Melanie_Dressman@englewood.k12.co.us

From: SUSAN WALKER
To: Jackson, Katy
Subject: Public Comment ESEA Waiver
Date: Wednesday, October 31, 2012 11:44:24 AM

Hi Katie,
This waiver would be beneficial to our district. In building school systems to improve and enhance our extended day programs, this ESEA waiver would allow us more program flexibility.

Susan Walker
21st CCLC District Coordinator
Greeley Evans School District 6
1025 9th Avenue
Greeley, Co 80631
970-348-6303 Work
970-302-5933 Cell
Hi Katy-

My comments on the waiver are the following:
Guidance is needed to ensure that expanded learning time does not equal more of the same. Community partners must continue to be supported partners as they provide expanded learning opportunities that traditional educators do not provide and they reach and engage many students that traditional educators do not. Students MUST be a part of the decisions around expanding learning time because if they are not bought in and part of the solution, expanding the time will not result in the desired outcomes.

Thanks

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Tom,
I do have a couple of questions/comments regarding the waiver.

1. We are finding in Adams 14, especially in the high school programs, that when students have free periods, to utilize our funding during the school day would be extremely beneficial for our credit recovery and academic intervention pieces. Many students are working, involved in sports or have family obligations after school and are not able to attend our programming then. To be able to use the funds during the school day when the student has open periods would help.

2. We are also implementing the “No Place for Hate” program in our high schools. To be able to use funding from 21st Century for speakers to address the whole school which then would make a much more significant impact and stimulate participation in 21st Century programming.

3. These are 2 areas where if we could use funding during the school day hours would be instrumental in reaching students that are attending school but cannot attend the after school programs.

Patty Gleason
Youth Programs Coordinator/Adams 14
303-853-5578
11/5/12
To Whom It May Concern:
I do not agree with this waiver. I feel it will dilute the waters in school system and superintendents will push to use it to assist with their depleting budget. If this happens it will take away from the strong after school programs that are data proven to close the learning gap for students. From personal experience, it has taken a concerted effort to get everyone on board that the 21st Century Community Learning Center funds are separate and are to be only used for our after school programs. They are now all on board. Currently there is a huge partnership in our school district and community for our after school programs. Students are thriving in our junior high and high school programs in raising their grades, self-esteem, creating positive relationships, and building 21st Century skills that has made a huge difference during the school day and in the classrooms with less disruption and more focus on academics.
Our school district has been on a salary freeze for 5 years, with no end in sight of continued budget cuts. I feel, if this waiver is passed, it will take away from after school programs and the students who need it most will suffer greatly, not only in our school district, but in 21st Century Community Learning Centers across the state. Thank you for your consideration of my input in your decision making.
Sincerely,

Debbie Morrill
Director
21st Century Community Learning Centers
Soaring Without Limitations (6th-8th grades)
Dream Big (9th-12th grades)
Cripple Creek-Victor School RE-1
410 N. B Street, Room C100
Cripple Creek, CO 80813
719-439-6711 cell
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Committee of Practitioners Meeting – November 7, 2012

Held at Charter School Institute, 1580 Logan, Denver

**Members Present:** Mary Ellen Good, Jesús Escarcega, Mark Rangel, Bridgette Muse, Anita Burns, Dianna Hulbert, Kendra Anderson, Holly Goodwin, Jane Toothaker, Kirk Banghart, Laura Gorman, Renee Howell.

**CDE Present:** Pat Chapman, Morgan Cox, Clara Martinez, Kathryn Smukler

**Welcome & Introductions**
Jesús opened the meeting by welcoming the group and thanking everyone for coming. Jesús chaired the meeting.

**Review of Bylaws**
The CoP Bylaws state that a member will serve a term of three years with the option to serve another three year term and then additional years if approved by the membership. Should the maximum number of years be limited to six in an effort to provide an opportunity to others wishing to be on the committee and to infuse new thinking and ideas into the committee? Anita suggested that members should be able to choose staying on longer if willing to do so. The CoP agreed with Anita because it’s difficult to find people who will make the commitment. The cap of CoP members is 25; the membership in now at 17. The CoP can still accept new members without anyone stepping down. If the CoP did have 25 members and others wanted to join then then veteran members could consider resigning. The CoP needs representation from the Southeastern region of the State and from the Grand Junction, Delta and Glenwood Springs region. The CoP does not support changing this bylaw.

The committee approved the addition of **1903(B)** to the introduction and the removal of **Title IVA, Title V, and Title IB (Even Start)** in section 3.1 – See handout. Motion-Kirk, 2nd Bridgett- PASSED.

**ESEA Waiver Request Feedback**
CDE is pursuing a waiver of certain requirements of the 21st Century grant as part of its ESEA Flexibility package. As part of the public comment process, the CoP has been asked to provide feedback on the Waiver application. There were questions and discussion regarding participation of private school children and in-school versus extended day and after-school programs. Following discussion, the COP approved a motion in support of the 21st Century Waiver: Motion-Mary Ellen, 2nd Holly, APPROVED. Additional details will be provided to the committee, if Colorado receives approval of the waiver request.

**Consolidated Application Feedback**
The CoP was asked to provide suggestions and feedback on the current application and what they might like to see moving forward. The following ideas were generated:
Attachment A: Optional Flexibility Request

- Use the Perkins Grant model – easy to complete in one step
- UIP and Consolidated Application – would like to be able to put Titles II & III into the UIP as well as Title I.
- Only need to submit a full application every three years if
  - funds are always used in the same way each year
  - the district is not PITA
- If UIP is approved, should take the place of Consolidated Application
- Use a long version of the application for large allocations and a short version for small allocations
- Use the long and short versions but base it on the number of students
- Items in the narrative could be checked during onsite monitoring visit
- Pilot new application with a BOCES, one small district, one large district

Pat Chapman told the committee about the E-grants system that may be adopted by CDE. The department has been looking into this for about 15 years. CDE will need to be part of whatever system the State chooses. That seems to be Grantium. CDE will use a small competitive grant to pilot the system in 2013-14. The following year, 2014-15, the consolidated application could be in the E-grant system. If committee members have feedback on this work, please provide to Kathryn at Smukler_k@cde.state.co.us

The group expressed a concern about making too many changes for the 13-14 school year if major changes will happen with the E-grant system in 14-15. Learning too many new systems in back to back years will be very difficult.

If you have feedback, please email Kathryn directly at Smukler_k@cde.state.co.us.

Title I & III Coordination

Title I and Title III representatives attended the Title III Directors meeting in October (Trish Boland and Morgan Cox). Title III is assisting Title I with the November Title I office hours – scheduled for November 15. The Office Hours will address the legal requirement associated with civil rights and how to serve English Language Learners.

The Office of Language, Culture, and Equity (LCE) in conjunction with the Title III team is offering monthly technical assistance opportunities focusing on English Learners in the state of Colorado. Seven opportunities are scheduled for the 2012-2013 school year. These opportunities will take place on the last Wednesday of the month from 3:00-4:30pm and will be conducted by webinar. All interested individuals are welcome and encouraged to attend.

The following dates have been scheduled:
- November 28, 2012
- January 30, 2013
- February 27, 2013
- March 27, 2013
- April 24, 2013
- May 29, 2013

The webinar information will be in the scoop or you can contact Clara for the information.
Attachment A: Optional Flexibility Request

Morgan asked for input from the CoP if you have any ideas please email her at cox_m@cde.state.co.us

FYI...Morgan was asked a lot of questions by House Majority Leader McNulty about ELPA. Liliana Graham and Morgan were asked to rewrite the ELPA guidance rules. The draft has been submitted, and they’re just waiting to hear back.

**PQI Program Quality Indicators**
CoP members thought this work would be beneficial to new Title I employees. There were a lot of suggestions on the format of this document (using different color of fonts, placing the quality indicators before the compliance ones if kept in the PowerPoint slides). The committee felt this is a good idea and great tool as long as it’s not in the application. The committee suggested having a pilot with a couple of districts and BOCES. Some large ones and some small ones to work out the glitches then send to everyone. CDE could hold a large conference to explain what PQI is all about. Including the history of the indicators.

**Focus Schools and Consolidation**
A draft proposal was put on the screen. The committee had many questions and felt that the language of the proposal was unclear. Concerns expressed by the committee include:
- It’s a huge shift to remove flexibility
- Some LEAs believe that the expenditures are being tracked in the district and would be available through the ADE

Kathryn will visit with Trish and send this out once the language is clear. The CoP supports the concept of the proposal but needs to see a cleaner version.

Next meeting is February 6, 2013

The meeting was adjourned.