

Summary of State ESEA Flexibility Request

STATE: Colorado

Purpose: The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Colorado has taken significant legislative actions consistent with a unified vision for student improvement, and those legislative actions serve as the bedrock of its waiver request. Through legislation, Colorado has created accountability and educator evaluation systems that are based on college and career-readiness, focused on driving student growth, based on the use of data to support continuous improvement, and focused on ensuring consequences (positive and negative) based on student outcomes. The request summarizes this vision at the outset, and the consistent themes are returned to throughout the application. Colorado's approach represents a relatively significant departure from Adequate Yearly Progress (AYP), and seeks to replace AYP-like determinations with a more ambitious, state-driven college and career-readiness accountability system.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Colorado has a definition of postsecondary and workforce readiness that includes the knowledge, skills, and behaviors essential for success in college and the workforce. The definition begins: "Postsecondary and workforce readiness describes 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." (p. 288) It then itemizes knowledge and skills that students should be expected to demonstrate, organized by areas of content knowledge (literacy, mathematical sciences, science, social studies and social sciences, and the arts and humanities) and "Learning and Behavior Skills (critical thinking and problem solving, find and use information/information technology, creativity and innovation, global and cultural awareness, civic responsibility, work ethic, personal responsibility, communication, and collaboration). (p. 288-289) This definition was developed through a collaborative process between the Colorado Department of

Education and the Colorado Department of Higher Education, involving regional meetings and feedback from more than 1,000 stakeholders. (p. 9)

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Colorado's request shows a strong commitment to evaluation and continuous improvement in all policy areas. In particular, Colorado's plan for implementing CCSS identifies "continuously refining teaching and learning" as an ongoing process that must be part of the state's commitment to implementation. In addition, the state identifies other places where state policy is meant to drive continuous improvement:

- Colorado's plan for transition to new standards explicitly includes a commitment to continuously refining teaching and learning. (p. 25)
- Colorado's accountability system is designed to support continuous improvement, particularly in the lowest performing schools. (p. 113)
- Colorado's teacher evaluation system is meant to give teachers the feedback and supports they need to continuously improve their practice. (p. 118)

The request's narrative regarding continuous improvement tends to focus more on practitioners and less on the need to continuously update and improve state policy.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Colorado's description of its supports for districts and schools describes a Tiered System of Supports that draws significantly on Colorado Department of Education capacity. (p. 105-116) While the state does not specifically discuss its capacity and how that affects its ability to execute its plans, it has in place some significant infrastructure for supporting districts and schools, perhaps most notably the SchoolView data system. (p. 52-57) Colorado has a partnership with the Colorado Legacy Foundation which helps provide the Colorado Department of Education with additional capacity on significant initiatives. (p. 120)

Principle 1: Standards and Assessments. This section addresses the nature and extent of the state’s proposed plan to implement college and career-ready standards and assessments over the next several years.

1. Describe the state’s plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Colorado has planned for a multi-year transition to new standards and assessments, with a significant focus on ensuring that teachers are able to teach the new standards. The state is currently in year two of a four-year plan to implement the standards. Year one focused on awareness; year two focuses on transition; year three will focus on full implementation; and years four and onward will focus on transformation, the ongoing process of continuous improvement.

Colorado has conducted a gap analysis comparing its new standards to the state's previous standards, and used those as the basis for its transition plans. The Colorado Department of Education (CDE) has established a Standards Implementation Team that includes representatives from different areas of the agency, notably the Exceptional Student Service Unit (to ensure that expectations for students with disabilities are maintained at a high level). (p. 24) District and school leaders have been provided with a Transition Overview by CDE to help guide their implementation. (p. 24-25) Districts and expected to use the current school year to design a standards-based curriculum, and then begin using that curriculum in 2012-13. (p. 24) New content collaboratives are being developed to support the creation and dissemination of standards-based assessment and instructional materials. (p. 32)

Colorado has several efforts focused on teacher preparation, licensure, and professional development. These include:

- Professional development opportunities focused on and aligned to the new standards. Colorado is participating in the Strategic Learning Initiative to provide instructional and assessment tools for teachers. (p. 28)
- Educator preparation programs will be required to train students in the use of the new standards. (p. 28)
- In addition, Colorado is partnering with the New Teacher Project to develop an effectiveness-based system for licensure, induction, and preparation aligned to the new standards. (p. 29)

Colorado is participating in an alignment grant to use aligned assessments to determine postsecondary placement. Colorado will also expand access to postsecondary coursework for students still in high school. (p. 30)

Colorado is pursuing multiple avenues to identify rigorous and aligned assessments; it is undertaking local assessment development and participating in both assessment consortia. (p. 33) Its high school assessment includes the ACT. (p. 35)

Principle 2: Differentiated Accountability and Supports

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Colorado will make annual accountability determinations for all schools and districts based on student status and growth toward college and career-readiness, including a primary focus on growth on state assessments. The measures are tied to the state's definition of college and career-readiness, which builds on CCSS to articulate knowledge and skills needed to be successful beyond high school. Colorado uses three interrelated measures for accountability at the elementary and middle school level focused on assessment results (both raw achievement and growth), and adds a fourth at the high school level focused on college and career-readiness.

- All schools are measured on Achievement (based on assessment results), Growth (based on assessment results), and Growth Gaps (based on assessment results for disaggregated groups). High schools are also measured on Postsecondary and Workforce Readiness (based on graduation rate, subgroup graduation rate, dropout rate, and composite ACT score). (p. 49)
- The percentage score allocations at the elementary level are Achievement 25%, Growth 50%, and Growth Gaps 25%; at the high school level, Achievement 15%, Growth 35%, Growth Gaps 15%, and Postsecondary and Workforce Readiness 35%. (p. 49)

Colorado sets AMOs for all students, based on its Growth to Standard measure. (p. 67) These results are then aggregated at the school, district, and state level. (p. 68) State expectations in Academic Achievement are based on proficiency percentile. (p. 73) Academic Growth to Standard is based on median student growth percentile, considering both normative growth and adequate growth to standard. (p. 74) Median student growth and median adequate student growth for historically disadvantaged groups is the driver of the AMOs for Academic Growth Gaps. (p. 76-77) Postsecondary and Workforce Readiness AMOs are based on graduation rates, dropout rates, and ACT scores. (p. 78) "Overall, the AMOs are meant to strike a balance between being ambitious and being attainable, and are meant to reflect an aggregate of student-level performance such that improvements at the school- and district-level mean improvements for each individual student." (p. 80)

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Student growth is a significant focus of Colorado's accountability system. Colorado's accountability system includes Academic Growth to Standard (normative and criterion referenced growth). (p. 43) This measure tracks how each student is progressing toward college and career-readiness, which creates a higher expectation of growth for students who are further behind. (p. 47) The system sets goals referred to as adequate growth percentiles, which let districts and schools know how much progress should be expected from each student to get them on track academically. (p. 45) This creates explicit pressure to increase growth most rapidly for historically underperforming students. (p. 47) In addition, Colorado holds districts and schools accountable for their Growth Gaps, to ensure that all populations of students are experiencing academic growth.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Colorado's accountability system includes a Growth Gaps element that focuses specifically on closing the achievement gap. Growth Gaps for historically disadvantaged students are a core part of the state's accountability system, so schools are accountable for ensuring that all subgroups perform well. (p. 49, 81) Colorado will continue to disaggregate into subgroups for accountability purposes, although it collapses the different minority categories into a single "minority" category and adds a category for catch-up students. (p. 44) This change is part of a larger effort to create consolidated subgroups to increase the "n" size of each and reduce the number of students left out of accountability calculations. Its AMOs do not vary by subgroup (p. 81), but the nature of its "growth to standard" accountability means that some subgroups will need to make greater progress than others to be counted as succeeding. In addition, data is disaggregated to show gaps including minority status, poverty, disability, and limited English proficiency. (p. 40) Colorado also has special procedures for calculating accountability for English Language Learners -- who comprise 13.28% of the state's K-12 population -- based on an English language assessment. (p. 60)

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Colorado's accountability system contemplates a differentiated system of supports matched to individual districts and schools based on a uniform planning process, which is meant to facilitate diagnostic review and then actions based on the diagnosis.

All schools and districts are required to analyze and respond to their data through a Unified Improvement Plan process, with tiered supports then provided based on the plans. (p. 41, 103) The process consolidates several federal and state reporting requirements, with a common template that districts and schools can adapt to meet their needs. (p. 103) It is meant to focus districts and schools on their particular performance challenges, and make improvement planning more of a continuous improvement process. Data analysis, target setting, and action planning are the key building blocks of the UIP system. (p. 104)

Depending on school performance, schools must prepare a Performance Plan, Improvement Plan, Priority Improvement Plan, or Turnaround Plan. (p. 47, 106) Turnaround plans for the state's Priority Schools flow from the Unified Improvement Plan process, which for Priority Schools includes submitting plans to CDE for review. (p. 90) A state panel evaluates the quality of the plan and the ability of the district to execute it. (p. 91) The options for school improvement are generally consistent with principles that have been consistently articulated by USED, with some state support for districts and schools to undertake the planning and implementation process. Colorado is maintaining public school choice and supplemental educational services (SES) in its accountability plans. (p. 92)

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Colorado identifies strategies for turnaround consistent with and building on principles articulated by USED, with differentiated supports based on the results of district and school diagnostic reviews.

Colorado's state accountability law provides options for research-based strategies to be utilized in turnaround schools, including the use of a lead partner, reorganizing, seeking recognition as an innovation school, using a school management organization, converting to a charter school (or changing the nature of the charter for a current charter school), or some other similarly dramatic option. (p. 94-95) Consequences for

failing to make adequate progress generally include the replacement of the management. (p. 95) A similar progression is used for districts. (p. 96) Ultimately, sanctions can include the loss of accreditation. (p. 97)

Colorado has a Tiered System of Supports that is meant to provide supports tied to school needs. (p. 105-108) Comprehensive appraisals and the state's school support team help support the work at the local level. (p. 108) Colorado provides some grants to support the turnaround and diagnostic review processes. (p. 109-112)

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Colorado plans to use a performance management system to increase school and district capacity and provide analysis and supports to LEAs. (p. 113) An improvement manager at CDE works with the districts and schools, and those districts' data are regularly analyzed by CDE. (p. 114) Colorado's system consistently analyzes performance to help further continuous improvement, with real accountability for results. (p. 115-116)

Principle 3: Teacher and Principal Evaluation and Support

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Colorado adopted transformational teacher effectiveness legislation in 2010. (p. 118) The new law is meant to provide a basis for continuous improvement, support the use of evaluation results for key personnel decisions, and ensure evaluation is based in significant part on student growth. (p. 118) Since then, Colorado has conducted extensive work to develop supporting regulations, and rules were submitted for legislative approval in November 2011 (with action expected February 2012). Pilots of the system are already underway.

Key elements of Colorado's approach include the following:

- 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; and
- Assigning each teacher and principal a rating of ineffective, partially effective, effective and highly effective.

Colorado has chosen pilot sites for the new system, and the pilots are already underway. (p. 120, 129-130) According to the request, the system will be used for continual improvement of instruction (p. 121), meaningfully differentiates performance into four ratings (p. 121), uses multiple valid measures (including student growth) (p. 122), requires regular evaluation (p. 124), will provide clear and timely feedback (p. 124), and will be used to inform personnel decisions (p. 124). The Colorado Department of Education will monitor local implementation, and ensure that local systems are valid. (p. 126-128)

Overall, Colorado's new statutory framework for teacher evaluation represents one of the most ambitious state legislative efforts to restructure teacher evaluation and Colorado is much further along in the development of its system than many other states.

Principle 4: Administrative/Reporting Burden

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED’s waiver application, does the state’s request address this issue? [See full request]

Colorado does not discuss Principle 4 specifically, but one of its major actions – creating a Unified Improvement Plan process – was designed to reduce the administrative burden on LEAs. (p. 41, 103)