



Submitting 2021 Requests to Reconsider for District Accreditation Ratings or School Plan Types

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Accountability and Continuous Improvement Unit
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Overview

The Education Accountability Act of 2009 (SB 09-163) and HB18-1355 authorizes the Colorado Department of Education to conduct an annual review of the performance of public schools and districts in the state and to make recommendations to the State Board of Education concerning the type of school improvement plan to be implemented in each school and the accreditation category for each district. The process for determining each district's initial accreditation rating and each school's initial plan type and the process for submitting district and school plans are outlined in the [Colorado District Accountability Handbook](#).

2021 Modified Request to Reconsider

Based upon the recommendation of the [COVID-19 Policy Implications Stakeholder group](#), H.B. 21-1161 enables the state to offer a modified request to reconsider process to schools and districts on the accountability clock (i.e., Priority Improvement, Turnaround) during the second year of the accountability pause (2021- 22). This is different from previous years when the process was open to all districts regardless of rating/plan type and allows for consideration of state and local data, as well as more qualitative considerations, such as State Review Panel recommendations and Unified Improvement Plans (UIPs).

While eligible districts and schools may request a new rating or plan type, the statute does not allow for the accountability clock to be adjusted. For example, a school with a Priority Improvement – Year 3 plan type could move to Improvement – Year 3 with an approved request to reconsider. Two subsequent consecutive frameworks at Improvement or higher would still be needed to fully exit performance watch. See some scenarios of the accountability clock over time if approval is granted through the 2021 request to reconsider process.

Table: Examples of Request to Reconsider Results Over Time

2019 SPF (2020-21 Plan Type)	2021-22 Plan Type (Approved Request to Reconsider)	2022-23 SPF (Frameworks Resume)	2023-24 SPF
Priority Improvement – Year 3	Improvement – Year 3	Improvement – On Watch Year 3	Improvement (Exits Performance Watch)
Priority Improvement – Year 3	Improvement – Year 3	Improvement – On Watch Year 3	Priority Improvement – Year 4
Priority Improvement – Year 3	Improvement – Year 3	Priority Improvement – Year 4	Improvement – On Watch Year 4

If a request is approved, the department will update public reporting of the rating or plan type. Because the department is not publishing performance frameworks during the accountability pause, the district or school will not receive a new framework with the updated rating or plan type. They will remain on performance watch. This means the district or school will still have to meet planning requirements and have access to supports (e.g., assigned support coordinator) and grants (e.g., Empowering Action for School Improvement – EASI). Although note that prioritization on the EASI grant will be lower.

The department worked with stakeholders (including the [Accountability Working Group](#)) to design an amended request process for fall 2021. The State Board of Education adopted rule amendments to the state's Accountability Act [here](#).

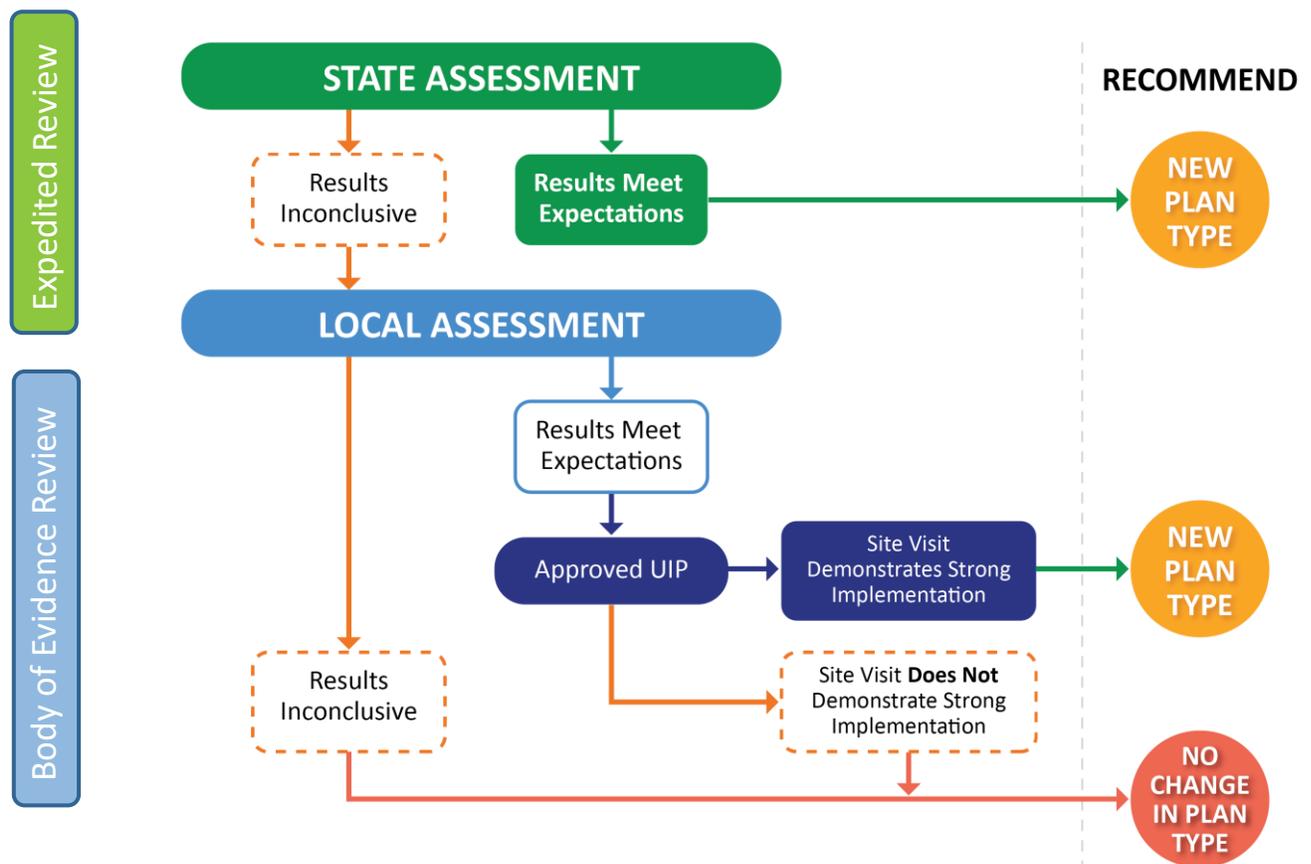
For the 2021-2022 school year, no later than **September 30, 2021**, districts must submit to the Department the plan type that the district has assigned to each new school.

In addition, no later than **September 30, 2021**, a district may submit a request for reconsideration on behalf of the district or a school earning a Priority Improvement or Turnaround rating or plan type seeking an increase to Improvement or above. If the district intends to submit a request and would like technical support, they may submit an [intent form](#) and attend [office hours](#).

Request Pathways

The Department will consider requests from districts or schools that are currently assigned a rating or plan type of Priority Improvement or Turnaround on the 2019 Performance Framework. There are two pathways: (1) an expedited pathway that relies on updated results for state measures that meet the 2019 performance expectations or (2) a body of evidence pathway that includes a review of local assessment data, the site’s Unified Improvement Plan and a site visit. See the flowmap of the 2021 request to reconsider process below.

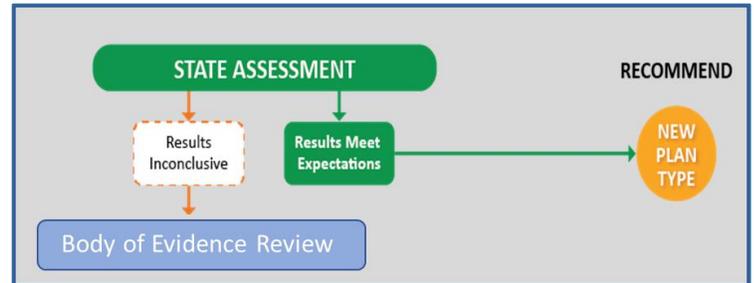
Flow-map of 2021 Request to Reconsider Process



Expedited Pathway

This approach relies on updated 2021 state performance data across applicable performance framework indicators (i.e., achievement, growth, postsecondary workforce readiness) and will be calculated by CDE for all districts and non-AEC schools currently receiving Priority Improvement or Turnaround ratings. If

state data demonstrate adequate student participation and representativeness and meet the 2019 performance framework expectations, the department will notify districts of their eligibility for an expedited approval recommendation to the State Board of Education. If recommended for approval through the expedited pathway, the district does not need to supply further evidence (e.g., body of evidence, site visit). The district does, however, need to complete the [Accreditation and Request to Reconsider form](#) to indicate agreement for changing the district rating or school plan type. If state data are not available or do not meet 2019 performance framework expectations, then the district may choose to participate in the Body of Evidence Review (see next section for a description of that process).

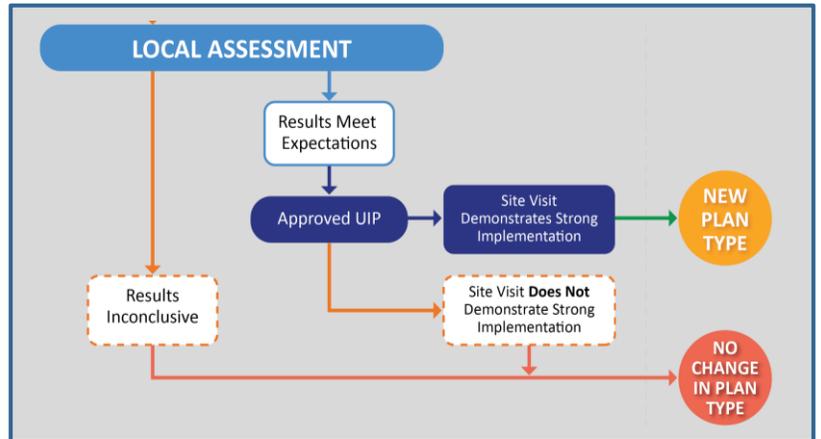


Details about CDE’s process for calculating the expedited pathway include:

- Data included in CDE’s expedited pathway calculations are shared in Appendix A.
- To ensure required 2021 state assessment results are representative of all students within the district or school, including disaggregated student groups, a minimum participation rate of 75% on state measures is required for each applicable Elementary, Middle and High school grade level. For example, a multi-level K-8 school must have had at least 75% of all enrolled students at both the elementary and middle school levels receiving valid test scores for inclusion in the expedited pathway. Note that parent excusals and students not testing due to COVID are included in the participation rate denominator and excluded from the numerator, ensuring representativeness of the entire enrolled student population.
- Schools with participation rates between 75% and 85% will be reviewed more closely by CDE to ensure the tested population adequately represents the demographic enrollment of the entire enrolled student population.
- Baseline-referenced student growth percentiles have been calculated for WIDA ACCESS from 2020 to 2021 and for required CMAS grades and content areas from 2019 to 2021. These baseline growth results measure student progress in comparison to historical student growth expectations.
- Districts do not need to provide any new information for the expedited pathway. CDE will notify districts and schools eligible for expedited pathway approval, and districts will need to confirm acceptance of the new performance rating within the online Accreditation Portal.
- Schools and districts may move from Priority Improvement or Turnaround to Improvement or Performance for the 2021 School Year through the expedited pathway. This is different from the body of evidence pathway which only enables a movement to an Improvement rating or plan type.

Body of Evidence Pathway

This option relies on three phases of evaluation across multiple sources of information: (1) performance data on nationally-normed local assessments, (2) review of a solid improvement plan (i.e., Unified Improvement Plan) and (3) an External Review Team site visit. The phases are sequential; each phase must be passed before moving onto the next one. This pathway relies heavily on school and district involvement to demonstrate local



performance and practices commensurate with earning an Improvement rating or plan type. Unlike in the expedited pathway, sites may not request a Performance rating or plan type. To initiate the process, the district will need to indicate they disagree with the current rating or plan type within the online Accreditation Portal. Once the Accreditation and Request to Reconsider form is submitted, a Request to Reconsider tab will be available for each district and school where the district has indicated they do not agree with the current rating or plan type. Each Request tab will include one area to upload evidence and draft a narrative response per district and/or school(s).

If a request does not meet expectations at any of the three phases of this pathway, then the department will not recommend the request for approval to the State Board of Education. The site's rating or plan type would remain unchanged and all clock expectations (e.g., planning requirements) and supports (e.g., support coordinator, EASI eligibility) would continue.

Phase 1: Local Performance Data Submission. Submissions must be based upon results from student performance on nationally normed local assessments and must be representative of the full student population. There are some slight differences for AEC in this phase.

Local Data Submission for Districts and Traditional Schools (non-AECs).

Performance data must be submitted using the [2021 Traditional Local Assessment Tool](#) for both achievement and growth indicators on the Request tab in the Accreditation Portal. CDE will review available state Postsecondary and Workforce Readiness (PWR) data for graduation, dropout, matriculation rate, but no additional local PWR data will be accepted. Unlike in a normal year, local performance data will be allowed to supplant state data for grades and content areas normally assessed by the state. To ensure all local assessment data are appropriate and sufficient for consideration as part of the request process, the following requirements will apply:

- All local assessment data must come from nationally normed interim or benchmark assessments and include both achievement score results and a growth or progress metric.
- Minimum 85% participation rate (denominator based on entire enrolled student population) for each applicable Elementary, Middle and High school grade level is required for consideration. This will ensure local results adequately represent district or school enrollment across all grades levels and disaggregated student groups.
- Data must be submitted for both English Language Arts and Mathematics and must represent the majority of enrolled students within each applicable Elementary, Middle or High school level. Data for Science, Social Studies or other locally tested content areas will not be considered for this process.

- Data must be submitted by grade and content area and may come from different assessments (including READ assessments for early grades). Data should be reported consistently for all grades administering the same assessment, and CDE may reject requests where data has been selectively reported (i.e., no cherry picking).
- Districts and schools must have at least 16 valid student test scores per EMH level for achievement and 20 for growth. Smaller systems can report grade-specific results that fall below these minimum reporting requirements for consideration, but the local data tool will be considered Personally Identifiable Information (PII) and will not be released publicly.
- All submitted performance data must have been collected during the 2020-2021 school year and can only represent the most recent year of results.
- Submitted achievement data must represent End of Year (e.g., final testing period, Spring) student results, and growth data must represent student progress from Beginning of Year (e.g., Fall) to End of Year (e.g., Spring).
- Achievement and growth expectations corresponding to the rating categories of Does Not Meet, Approaching, Meets, and Exceeds have been established by CDE using historical national norming information for each assessment.
- The local data tool will automatically score submitted results and total up indicator and overall totals.
- If a school or district must submit data for an assessment not included in the 2021 local data tool, use of the [2019 Request Template](#) may be accepted but must be done in coordination with CDE. If a school or district finds that their assessments do not align to the 2021 tool, contact the [Accountability and Continuous Improvement Unit](#).

Data Submission for Alternative Education Campuses.

Alternative Education Campuses (AECs) can submit data aligned to their 2019 approved supplemental measures using the [AEC Local Assessment Tool](#). This data tool includes academic and student engagement performance data from the 2019 performance frameworks and current best of completion rates and dropout rates. AECs are allowed and encouraged to include current performance data for their previously approved optional measures and may submit aggregated multi-year outcomes. AECs will not be able to submit data for optional measures they did not use in the 2019 school performance frameworks. The tool must be submitted using the Request tab in the Accreditation Portal.

Phase 2: Review of Improvement Plan. If the school or district has demonstrated achievement, growth, and (if applicable) postsecondary and workforce readiness performance on local data commensurate with an Improvement rating or plan type, then the school or district will move to the improvement plan review phase. This stage is used to ensure the school or district has a well-developed plan for sustained continuous improvement.

Districts will indicate whether the department should review the site's (a)2020-21 plan or (b)2021-22 plan in the Request to Reconsider tab in the online Accreditation Portal. Note that sites that elect to use their 2020-21 plans in the request to reconsider process must still update their 2021-22 improvement plans and submit them for CDE review by October 15.

If CDE's review of the 2020-21 plan did not have any required changes in the 2020-21 CDE Feedback, then the department will confirm if any further adjustments are needed specific to the request to reconsider process. If

there are remaining areas where the site's 2020-21 plan did not meet expectations, then the site should address those areas and submit a plan for review as soon as possible to ensure the request to reconsider process is not delayed. Early 2021-22 plan submissions will be regarded as on time for the October 15 deadline (i.e., resubmission will not be needed in October). The department is available for real time consultation to ensure that requestors meet planning expectations in a timely fashion.

The department will use a modified review criteria to expedite request to reconsider process that ensures high quality:

- Trend Analysis over time demonstrating an upward trajectory of student performance (e.g., local data)
- Well defined, research-based Major Improvement Strategies that address identified Root Causes
- An explicit action and progress monitoring plan that have a likelihood of demonstrating implementation of the identified strategies

Phase 3: Site Visit. If the school or district has demonstrated a clear plan for sustained improvement, the External Review Team will be assigned to perform a site visit based on a modified protocol. This stage is aimed at ensuring the school or district can demonstrate strong implementation of their approved improvement plan. Based upon the structure established by the [State Review Panel](#), the External Review Team will consist of two to four Colorado-based education experts, depending upon the size of the school or district. These site visitors are also trained as State Review Panelists that have been approved by the Commissioner of Education and the State Board of Education. The team will conduct a document review and site visit to examine four indicators:

- Whether leadership is adequate to implement change to improve results.
- Whether the infrastructure is adequate to support improvement.
- The readiness and apparent capacity of personnel to plan effectively and lead the implementation of appropriate actions to improve student academic performance within the school or district.
- (If the site is working with an external partner) The readiness and apparent capacity of personnel to engage productively with and benefit from the assistance provided by an external partner.

Site visits will take place over the fall and into the winter (as needed, either in person or virtually). The department will contact the district to begin coordination of the visit. The final report will be available to the district within a month of completion.

If the Panel recommends an Improvement rating or plan type as a better description of the school or district's performance, then CDE will consider this as a part of the overall body of evidence.

Submission of Request to Reconsider Materials

Districts will now have access to the accreditation form through the same platform as the UIP online system. Accountability Contacts will have access granted to the form as a tab titled "Accreditation Portal." It is through this portal that districts will indicate interest in participating in the request to reconsider process.

If eligible for expedited pathway:

- CDE will notify districts of all sites eligible for the expedited pathway. The CDE Accountability Contact will need to confirm agreement with the department's recommended rating or plan type in the [District and School Accreditation and Request to Reconsider Form](#). This form and all required signatures (i.e., Superintendent and Board President) must be submitted by September 30, 2021.

If submitting a Body of Evidence request:

- The CDE Accountability Contact must indicate they disagree with the rating or plan type assignment(s) (carried forward from 2019 and then 2020 during the accountability pause) in the [District and School Accreditation and Request to Reconsider Form](#). This form and all required signatures (i.e., Superintendent and Board President) must be submitted by September 30, 2021.
- Once the form is submitted, the Request to Reconsider tab(s) become available, and must include by September 30, 2021:
 - a. Submission of local data using either the Traditional or AEC Local Assessment tool.
 - b. Indication of submission of either the 2020-21 or 2021-22 improvement plan.

Your District's Accreditation Results			
Name	CDE Rating	District Agrees?	CDE Note
CDE Test District	New New Rating Improvement	Automatic Simplified RtR	New
School Accreditation Results			
Name	CDE Rating	District Agrees?	CDE Note
CDE Test School 1	New New Rating Priority Improvement	Automatic Simplified RtR	New School

Request to reconsider submissions that do not include all applicable criteria by the deadline of September 30, 2021 will not be accepted. All criteria must be submitted via the Accreditation Form in Salesforce, and all documentation received by that date will be considered final.

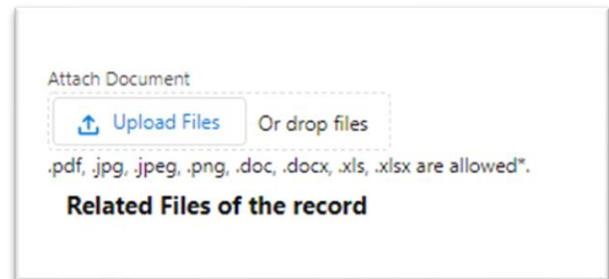
Technical Assistance and Support

Office Hours: If a district would like individualized assistance reviewing any local data, register for Office Hours (held via Zoom) [here](#). Office Hours will begin August 17 and will be held from 2 - 4 p.m. every Tuesday and Thursday until the request to reconsider process concludes. CDE staff will hold a request to reconsider informational webinar via [Zoom](#) on Wednesday, Sept. 1st at 1 pm.

Improvement Planning Support: If engaging in the Body of Evidence pathway, the department is available right away to support getting the improvement plan to approvable condition. Contact staff [here](#).

General Request to Reconsider Questions and Support:
Contact accountability@cde.state.co.us.

If a district would like to share the Local Assessment Tool with CDE staff for feedback, it must be sent via Secure File Transfer Protocol (SFTP), via Syncplicity, or attached to the Accreditation Portal in the online system. PII should not be sent over email and will not be accepted.



Request to Reconsider Excel Tool for Local Assessment Data Submissions

CDE has created templates in Microsoft Excel for districts and schools to submit local data as part of the Body of Evidence pathway. The intention for these templates is to minimize the level of effort required when submitting additional data and shorten the timeline for CDE to approve requests. Efficiency is particularly important in this process, as more time is need for scheduling site visits in the fall. If a nationally normed assessment is not listed in the tool, contact CDE using Office Hours for further consultation. The department may be able to analyze the local data, however, it will lengthen the overall process.

Finalizing Request to Reconsider Decisions

Utilizing the pathways described above, CDE staff will determine if a district or school request meets the evidentiary threshold to support an increased rating or plan type for 2021. Staff will then present recommendations for revised district accreditation rating and/or school plan types to the State Board of Education for approval.

Requests for reconsideration will only be considered if the request (1) is to change the district accreditation rating or school plan type for schools currently earning Priority Improvement or Turnaround ratings and (2) meets the conditions outlined in this guidance document. Requests will not be considered for changing historical framework ratings. Additionally, the department is not able to consider requests to change the year on the accountability clock or performance watch status (for example, a request to remove the “on watch” identifier). As the current circumstances and accountability pause are highly unusual, no aspect of this modified request process should be expected to carry over into future years. All decisions and precedents will be limited to the current 2021 rating year.

Final District Accreditation Rating Category and School Plan Type

The department will make its final recommendations on new plan types to the State Board of Education as early as November 2021. The state board will make the final decision on 2021 plan types no later than December 2021 for districts. The approval process for schools may extend into early 2022 depending upon the number of requests.

Note: the existing data on the performance indicators and percent of points earned will not change on the School Performance Framework or District Performance Framework report posted online.

Appendix A: 2021 Expedited Pathway State Data Availability

The chart below shows the state-level data included in CDE's expedited pathway calculation by grade and content area.

EMH Level	Content Area	Achievement	Baseline Growth
Elementary	ELA	Grades 3 & 5	Grade 5
	Math	Grade 4*	None
	WIDA ACCESS		Grades 1-5*
Middle	ELA	Grade 7	Grade 7
	Math	Grade 6 & 8	Grades 6 & 8
	WIDA ACCESS		Grades 6-8
District & High School	ELA	Grades 9-11	None
	Math	Grades 9-11	Grade 9**
	WIDA ACCESS	Grades 9-12	Grades 9-12
	PWR	Graduation, dropout and matriculation rates lagged from 2020	

* Also includes grade 6 results for the small number of Elementary schools where grade 6 is the highest grade served.

** CDE is still investigating baseline growth for PSAT/SAT and whether it is sufficient to support an expedited pathway option for high schools and districts.