

Connecting the Dots in CO K-12 Public Education

Abstract

A Legislature-required audit of the K-12 assessment system analyzed performance rating data from school years 2010 to 2018 at school and district levels. This report examines 2022 and 2023 performance data based on CDE records and shows that district demographics, the CMAS testing system, and public education funding leave too many students in a dark hole of inequity. Current solutions have not filled the holes.

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On behalf of Advocates for Public Education Policy

The Colorado Department of Education presented a report on the state’s K-12 accountability program to the General Assembly in 2022 that resulted in the Assembly’s formation of a task force in 2023 to review the program for updates and changes. This analysis expands the boundaries of the state authorized examination conducted by **HumRRO**, the consultants that performed the audit. In particular, this report delves into the HumRRO statement that **“differences in academic outcomes for student groups could indicate the presence of unintended barriers or obstacles affecting their performance...”**

The principal findings of “Connecting the Dots...” reinforce some observations from the state audit of data from 2010 to 2018. This study updates that analysis by examining CDE performance data and school finance data from 2022 and 2023. **It confirms that significant “barriers and obstacles” to positive student academic outcomes do exist.**

This report particularly identifies substantial deleterious impacts of the state’s incapacity to properly resource districts with high percentages of Free and Reduced Lunch, English Language Learning, and minority students. The report finds significant questions related to the uses of CMAS standardized testing in determining district performance ratings, including test Participation Rates. It documents negative correlations between CMAS test results and poverty and language learning as barriers to positive achievement results.

Colorado’s public education narrative is not about teachers, schools, and districts failing students. It’s about state government policies failing too many students, teachers, schools, and districts.

Sources and Focus

This report examines **111 Colorado school districts** by population, district finance, FRL, ELL, minority status, performance ratings, and CMAS test participation in 2022, with reference also to preliminary data from 2023. These 111 districts report sufficient information for analysis. **Not all districts report sufficient information. Their data is not available for review and are not included in this examination.**

The data comes from two sources: **Colorado Department of Education (CDE)** and **Public School Review** that gathers and organizes its information based on CDE content. CDE data displays achievement and growth data in *School View*, a section of the CDE website. A section of *School View*, *Financial Transparency*, gives CDE data for school finance information by district and schools. This report focuses primarily on district level performance ratings and finance.

The state divides districts into five rating levels: Distinction, Accredited, Improvement, Priority Improvement, and Turnaround. For the purposes of this report, “Improvement” encompasses Improvement, Priority Improvement, and Turnaround ratings. From the public’s perspective, any kind of Improvement status is not good in itself, so this report attempts to understand the elements that drive Improvement ratings that can be discerned from data displayed by CDE.

Overall Findings

Colorado will strengthen and sustainably improve public education in its many parts by:

- **Redesigning the system of standardized testing and school/district performance ratings.**

Current assessments confirm that districts with a high percentage of students in Free/Reduced lunch (FRL, a low-income demographic) and English language learning (ELL) status produce low achievement test scores and low school and district performance ratings. These same results occur year after year without change. Once-a-year standardized tests as a primary measure of district and school performance do not consistently provide fair, accurate, valid information for district or school performance ratings. Parents and the public deserve a public education system that will produce positive achievement outcomes. The state's current standardized testing system and accountability methodology do not meet that goal.

- **Undoing the muddle of low participation rates on achievement test results**

Current state methods of calculating standardized test participation levels are confusing at best and misleading at worst. The "95% Meets Participation" rating does not indicate validity or accuracy of aggregated standardized test scores as a performance measure for schools or districts. This designation does not even confirm that 95% of eligible students took the tests. A majority of districts do not have 95% of eligible students taking the CMAS tests even though they are rated as Meets 95% Participation. Some districts were reported as Meet 95% Participation with fewer than 80% of children actually tested. In 2022, over 44,000+ students received parental excusals from CMAS exams and thousands more sat out the tests without excusals. This formal withdrawal of support of standardized tests by thousands of parents shows a lack of confidence in this method of assessing school and district performance. At the same time, it allows districts to mislead the general public as to achievement outcomes.

- **Restructuring public school finance to match education challenges.**

The impact of money on district results cannot be underestimated or ignored. Districts, especially those educating higher populations of FRL, ELL, and minority students, need more money, resources, and services. The impact of high income vs. low income on education results is demonstrable. Out of 17 school districts with 0-25% of students on FRL (middle to high income districts), all earned Accredited or Distinction status. On the other hand, every district educating students at 75%+ FRL is on Improvement status. Further, of 22 districts with less than 30% contribution in local property taxes to their schools (implying low income), 14 are on Improvement status, 12 have 50%+ students on FRL, with 3 educating students with 75%+ on FRL.

This examination documents education conditions and results based on districts regardless of whether they are in rural, suburban, or urban locations. The report identifies symptoms and sources of Colorado's public education challenges, the adverse effects of unequal funding treatment by public and private dollars, and the impacts of ineffective "solutions" to the state's education deficiencies. It will outline the challenges that must be addressed to achieve improvements that will produce steady advances in the quality of learning and the availability of opportunity for students.

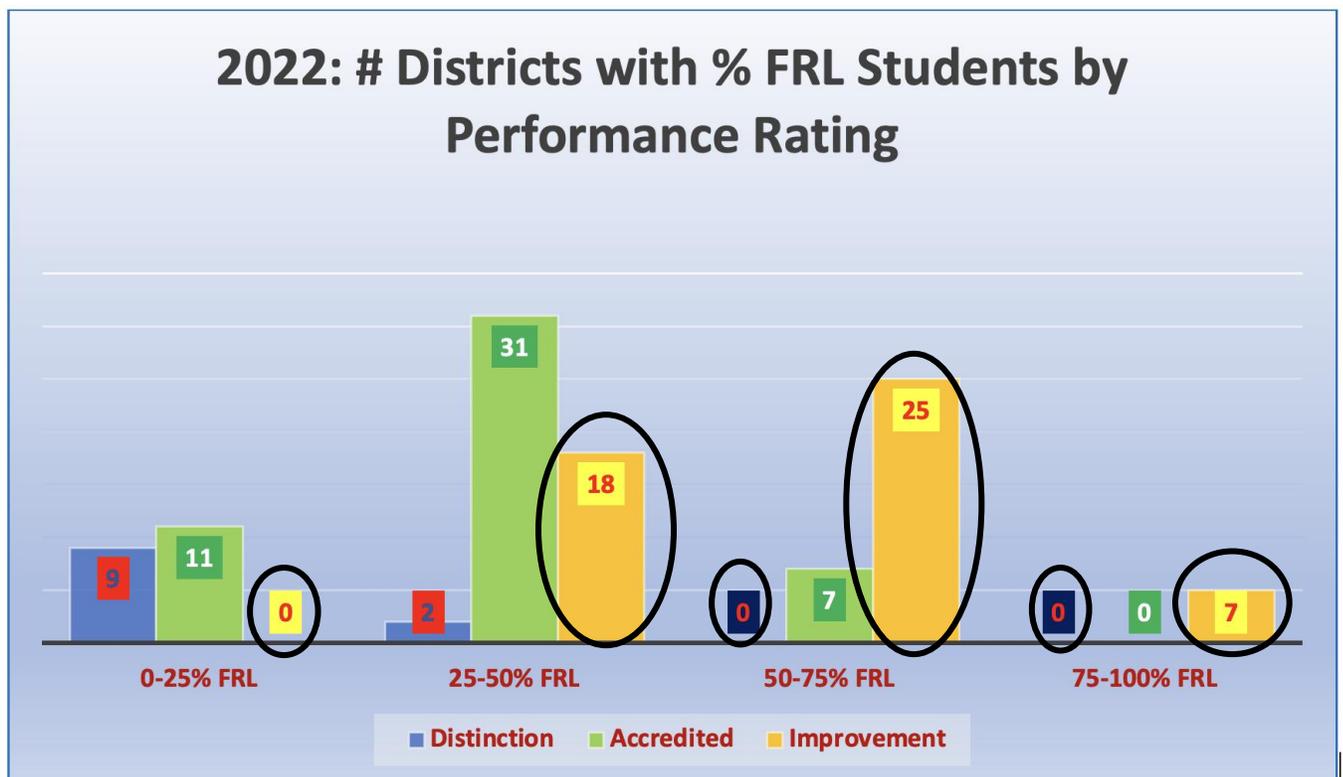
SYMPTOMS AS GUIDE TO CURE

The problems embedded in Colorado’s public education platform show a repeated pattern in 2022 and 2023 reported data. When the data are combined, none can quibble over what is negatively affecting education outcomes for thousands of students.

Free and Reduced Lunch Poverty Impact

Standardized test results and performance ratings can be inferred from the percent of children receiving FRL services.

- No district with a **Distinction** rating has students with more than 25% to 50% FRL status; in fact, 7 of 11 districts on **Distinction** have students at 0 to 25% FRL.
- Of 49 districts with an **Accredited** status, 42 have 0% to 50% FRL. Only 7 of these **Accredited** districts educate children at 50% to 75% FRL status, and none works with students above 75% FRL.
- Districts’ ratings based on their **FRL percentage**:
 - Of 51 districts with 25-50% students on FRL, **35%** are on **Improvement**.
 - Of 38 districts with 50%+ students on FRL, **82%** are on **Improvement**.
 - Of 7 districts with 75%+ on FRL, **100%** are on **Improvement**.
- Districts on **Improvement**:
 - Of 52 districts on **Improvement**, every district has at least 25% to 50% FRL.
 - 25 districts on **Improvement** have 50% to 75% FRL.
 - 7 districts on **Improvement** have 75% to 100% FRL, and these are at the lowest end of the Improvement rating.

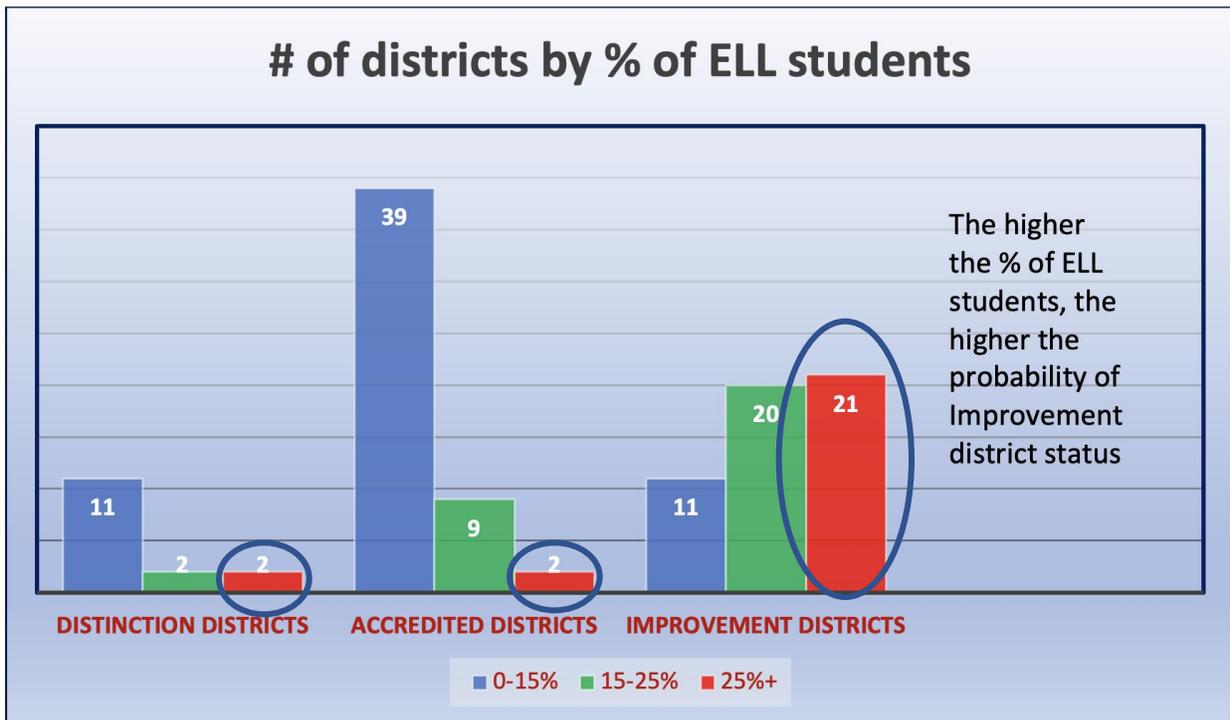


High FRL student populations create overwhelming obstacles to achieving Accredited and Distinction performance ratings. **No district with more than 50% FRL achieves Distinction, no district with higher than 75% FRL achieves Accredited.**

English Language Learning Impact

Colorado serves almost 110,000 English Language Learners (ELL), or 12.4% of students. There are 14 districts that have a student population with 25% or more ELL students. These districts consistently rate **Improvement** under the current accountability system.

- No district with **Distinction** status serves more than 15% of ELL students, and of the 11 districts with **Distinction** status:
 - 10 educate fewer than 10% of ELL students.
 - 7 educate 5% or fewer ELL students.
- Of 48 districts with an **Accredited** rating:
 - Only 9 have more than 15% of ELL students.
 - Only 2 have more than 25% of ELL students.
- Of 52 districts with an **Improvement** rating:
 - 20 have more than 15% ELL students.
 - 12 have more than 25% ELL students.
 - 9 have over 29% ELL students.

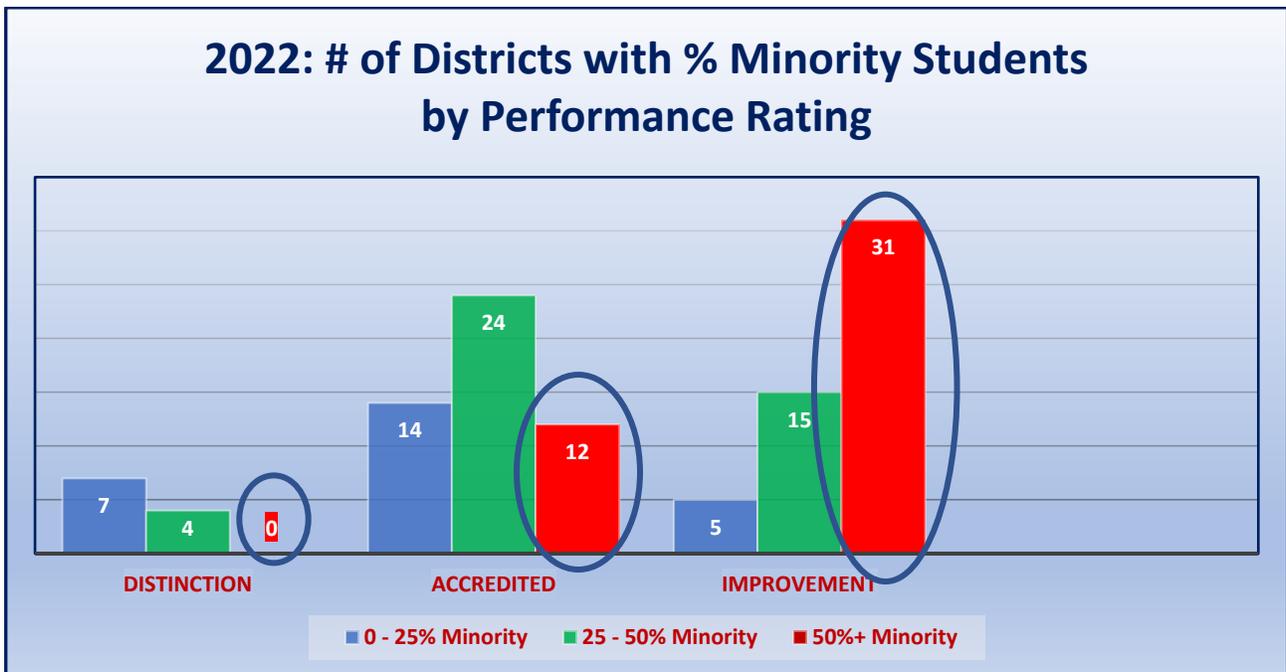


Distinction and Accredited districts educate fewer students in ELL status, reducing the education challenge level for their schools.

Minority Student Impact

Colorado is an ethnically and racially diverse state as reported in annual CDE data. Every district in Colorado exceeds 15% minority population; “minority” includes American Indians, Asians, Blacks, Hispanics, Hawaiians/Pacific Islanders, and individuals with two or more racial backgrounds. The racial demography of districts ranges from 16% minority to 92% minority. While higher minority numbers generally correlate to lower performance ratings, there is less consistency in impact.

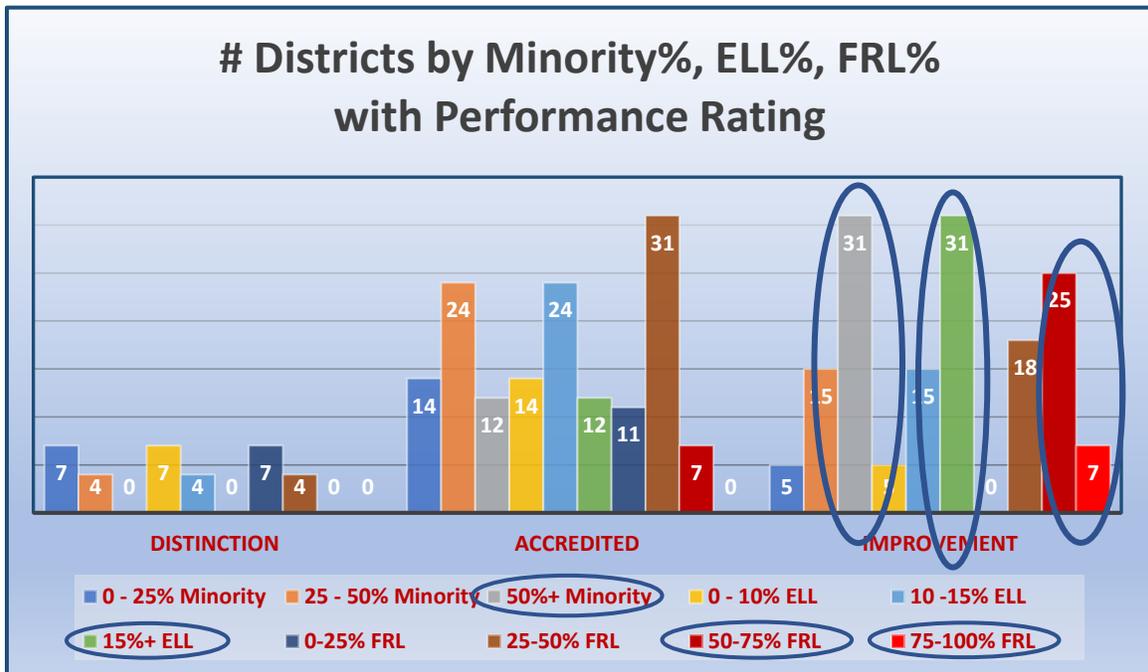
- Of 11 districts rated **Distinction**, 4 have a 25%+ minority population.
- Of 48 districts rated **Accredited**, 33 have 25%+ minority population, and 12 have 50%+ minority students.
- Of 52 districts on **Improvement** status –
 - 5 have fewer than 25% minority students.
 - 14 have between 25% and 40% minority students.
 - 31 have between 40% to 92% minority students.



Of the 10 districts with the lowest performance ratings, 8 exceeded 50%+ minority students.

Summary of Demographic Impacts

While CDE asserts there is a weak correlation between FRL, ELL, and minority student demographic challenges and performance ratings for “sites” on the “clock,” i.e., in Turnaround status, this report documents that each of these factors has a significant relationship to district performance outcomes. Districts with a high percent of FRL, ELL, and minority students experienced the lowest performance ratings in 2022 and 2023. On the other hand, only districts with a low percent of FRL, ELL, and minority students under 30% received the highest performance ratings. (See chart below)



Highest FRL, ELL, and minority populations lead to lowest performance ratings.

Annual Standardized Test Participation Rates

CMAS standardized tests are a principal measure used by CDE for its performance ratings. Participation rates are important because the accumulation of results of all students in a school or district contribute to overall performance ratings.

CDE has two Participation rates: Total Participation rate and the Accountability Participation rate. The Total Participation rate is calculated based on the student population eligible for testing and the student population that takes the test. Parents may opt their students out of testing, but those opt out students are omitted in calculations of the Accountability Participation rate. Here is the CDE table that describes how Total Participation and Accountability Participation are calculated.

Total participation
parent excusals are counted as non-participants.

Accountability Participation
parent excusals are excluded from calculation.

Test Participation Rates and Total Participation Rate Descriptor*						
Subject	Total Records	Valid Scores	Total Participation Rate	Parent Excusals	Accountability Participation Rate	Rating
English Language Arts	17,713	16,542	93.4%	1,019	99.2%	Meets 95% Participation
Math	17,711	16,540	93.4%	1,033	99.2%	Meets 95% Participation
Science	5,867	4,391	74.8%	1,443	99.3%	Meets 95% Participation

Total Participation Rate Descriptor for Planning Purposes:

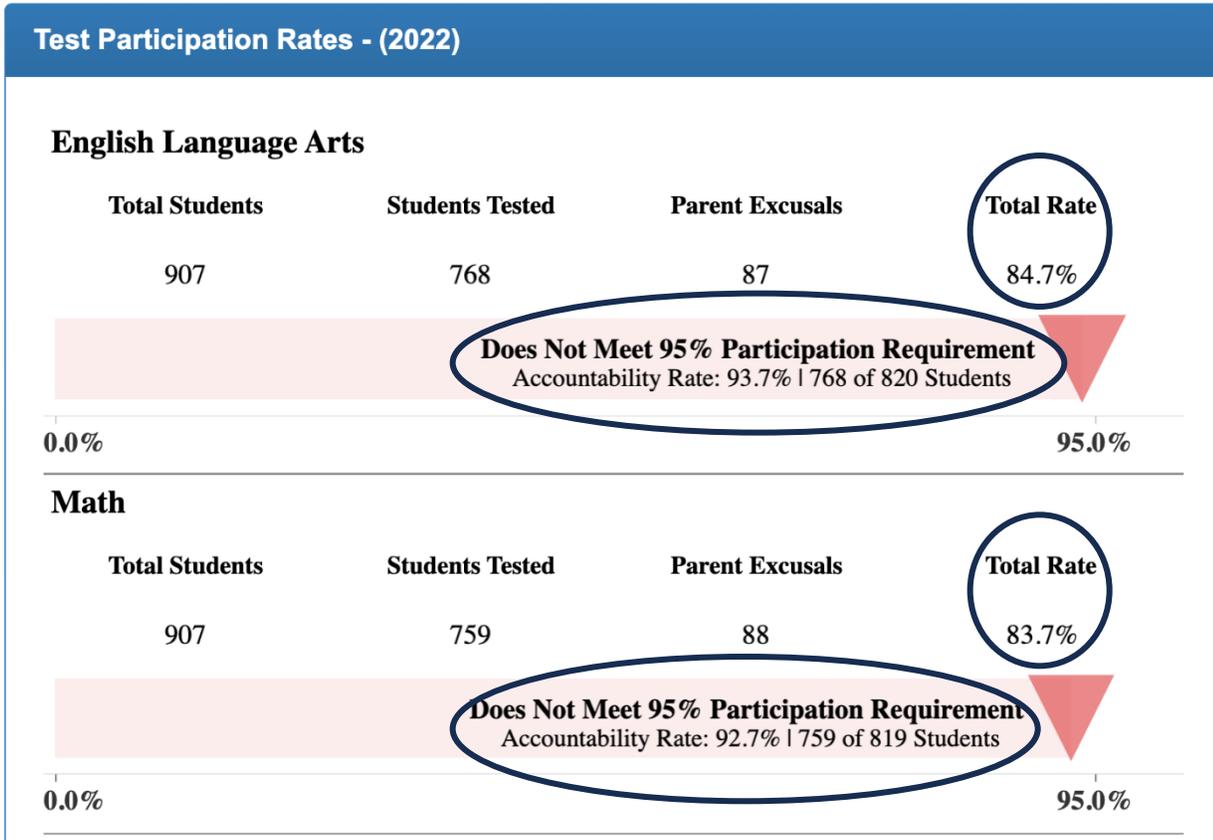
Low Total Participation

These ratings reflect whether accountability participation rates meet or exceed 95%.

Total participation descriptor is moving from the plan type in the top banner to a new row in the Test Participation Rates table beginning in 2023.

From this table, it is evident that the Accountability Participation rate is not an accurate reflection of actual number of test takers. It is a patch to accommodate opt-outs without “punishing” schools for parents who decide their children will not take the tests. But the effect is to cloud the actual condition of a school’s or district’s overall achievement, high, low, or otherwise.

Here is an example of a Participation Rate report from *School View*.



This example shows that **87 opt-out students in ELA** did not take the tests. The example does not display another **52 students who did not take the test and did not formally opt out**.

Accountability Participation is the most public citation on the CDE website to convey school or district level participation results. **It is an inflated number**. In the above example, the Accountability Participation rate is 9 points higher than the Total Participation rate. The large question is to what degree the totality of non-test takers affects the accuracy of school and district achievement CMAS outcomes whether calculating by Total Participation or Accountability Participation. Whether the non-test takers are formally excused or not, their absence means that the achievement of significant numbers of students may not be reflected in school and district performance ratings.

In 2022, the Accountability Meets Participation statement is even less reliable. There are two tests that require 95% participation, but schools and districts meet this 95% requirement if only one of the two tests gets to 95%. This means that schools Meet Participation if they have either ELA or math metrics at 95%. It appears that the state is lenient on interpreting Accountability Meets Participation standards,

while a large majority of districts do not meet the 95% Total Participation threshold. As it is, CDE produces performance ratings of **Distinction** for districts with low Total Participation rates.

Here is the most dramatic example of the misleading factors in test Participation Rate figures. Education Re-Envisioned BOCES received an almost perfect rating in the Accountability calculation at 99.6% Meets Participation. But the Total Participation number in 2022 was 44.7%, a 55% difference. This district is in Improvement status. Based on these numbers it's impossible to tell how accurate its overall performance rating of 43.4% is. It's unique that an entity with such low participation numbers was able to garner a parent excusal for practically every student who didn't take the test.

Total Participation numbers are also concerning. Enough students didn't take CMAS tests in the Distinction category, roughly 3000, to exceed the populations of each of eight Distinction districts, almost reaching the population of the highest rated school district, Cheyenne Mountain at 3600 students.

Between Accredited and Improvement performance districts with about an equal share of districts between the two categories in this analysis, Accredited schools with populations above 13,000 students missed **30,390** students through parental excusals. Improvement districts with similar populations missed only **11,467** students. That is, districts rated at the lower Improvement performance level had significantly more students taking the CMAS exams. At the same time, 15 of those Improvement districts did not meet the 95% Accountability threshold because not enough of their parents, mostly low-income, submitted excusal documents. Even though Improvement districts had better Total ratings on CMAS participation, these districts were labeled non-compliant in many more instances than Accredited districts.

Every performance level has a majority of districts **below** 95% Meets Participation using Total Performance calculations:

- Of 111 districts examined in this report, only 25 Meet Total Participation rates at 95%.
- Of 11 districts rated **Distinction**, 6 did not meet the 95% Total Participation threshold on CMAS test-taking, including Cheyenne Mountain school district with the state's highest performance rating. In sum, 55% of Distinction rated districts do not meet Total Participation expectations.
- Of 49 districts in 2022 with an **Accredited** rating, only 13 meet the 95% Total Participation level. More than 30,000 students from Accredited school districts are missing from CMAS tests in 2022.
- Of 51 districts with an **Improvement** rating, 42 do not meet the 95% Total Participation level. More than 11,500 students are missing.

Finally, based on CDE records in 2022, 44,000+ students are missing from CMAS results across the state. The number is probably significantly higher but is undetermined. At 44,000+ missing students, this population would make up the fifth largest school district in the state. It's a significant rejection by parents of the state's testing system.

86 of 111 Districts Do Not Meet 95% Total Participation Rate for CMAS Standardized Tests in 2022



Summary of Standardized Test Participation Rates

A large majority of school districts – 77% - do not meet 95% participation using the Total Participation calculation for the state’s standardized testing program. The story is more nuanced in that many more students are missing in the Accredited category than in the Improvement category.

It is impossible to determine based on reported data to what extent Total Participation numbers and 45,000+ missing students affect an accurate picture of school or district outcomes. It is likely there is a significant effect.

The reasons for and impact of low CMAS participation rates are an under-studied element of the state’s assessment program. At the least, Low Total Participation rates indicate significant dissatisfaction with testing among many parents and others responsible for students in the current environment.

Average Household Income, Local and State Taxes, and District and School Funding

Based on the many different funding sources within school finance, it’s complicated to provide an “apples-to-apples” comparison of district finances as they affect district performance ratings.

Differing mill levels, cost of living allowances, federal dollars, grants, and additional dollars to charter schools from outside sources complicate comparisons. These differences, however, should not be an excuse to ignore the impact of dollars on districts, especially districts that serve majority low income, minority, and/or second language learners.

As basic points of reference, the average state household income of 108 studied districts (three districts are not funded with local tax dollars) is \$69,342. The average household income of ten Distinction Performance districts funded with local property taxes is \$85,200. The average household income of ten Improvement Performance districts at the bottom of Improvement is \$57,927 ([income figures based on Wallethub’s analysis of least equitable school districts in Colorado](#)).

If, based on specific local demographics, certain districts rate Accredited or Distinction with below state average household income, their percentages of minority, FRL, and ELL students are low. If, based on specific local demographics, certain districts with above average state household income rate Improvement, their percentages of minority, FRL, and ELL students are high.

- McClave RE-2 “Distinction” district with 237 students, average household income of \$48,281, and 24% local property tax contribution to total district finance, has 26% minority students, 25%-50% FRL, and 5% ELL students.
- Denver “Improvement” district with 89,000 students, average household income of \$78,177, 70% local tax contribution to total district finance, has 75% minority students, 50%-75% FRL, and 29% ELL.

For McClave and its 237 students, school finance adjustments work with the state’s 65% addition to McClave’s budget. For Denver, even with higher household income and much larger local property tax contribution, the state’s contribution and total district finance do not provide resources sufficient to overcome the size of its obstacles and barriers related to FRL status and second language acquisition.

When multiple funding sources and expenditures are examined, the large picture confirms that lack of school finance funds for districts with high numbers of FRL, ELL, and minority students leads to **Improvement** performance ratings.

Here are examples of how low-income student populations compared to high-income student populations play out:

- Sheridan district receives \$20,059 per student overall, the highest among Improvement status districts. It serves 1,177 students with 86% minority, 29% ELL, and 75%+ FRL. Even with these total dollars, its performance rating is 43.4%, at the low end of **Improvement** ratings.
- The Aspen school district serves 1,549 students and its overall funding per student is \$22,561. Its population is 16% minority, 6% ELL, and 0-25% FRL. Its performance rating is 74.4%, a low-end **Distinction** rating.

There are almost 31 points in the difference between Aspen and Sheridan in performance ratings. The difference is a direct result of the obstacles and barriers facing low-income and ELL students, their parents, and districts/schools educating those students.

Here are other examples:

- Widefield district educates 9,370 students who are 56% minority and 25-50% FRL. The district only has \$11,462 total per student. To further document its low-income situation, the district receives only 31% of its total funding from local dollars, relying on the state and other sources for the remainder. The district is in **Improvement** status.
- Of 10 districts receiving the most total per-student dollars:
 - 7 are on **Improvement**.
 - 6 receive 42% or less of funding from local taxes.
 - 5 educate more than 60% minority students and 50%+ FRL students.

The implications are that districts with majority FRL, ELL, and minority students, even with substantial total district funding, do not receive enough resources or the right kind of resources to bring their high percentage of minority and low-income students up to Accredited status.

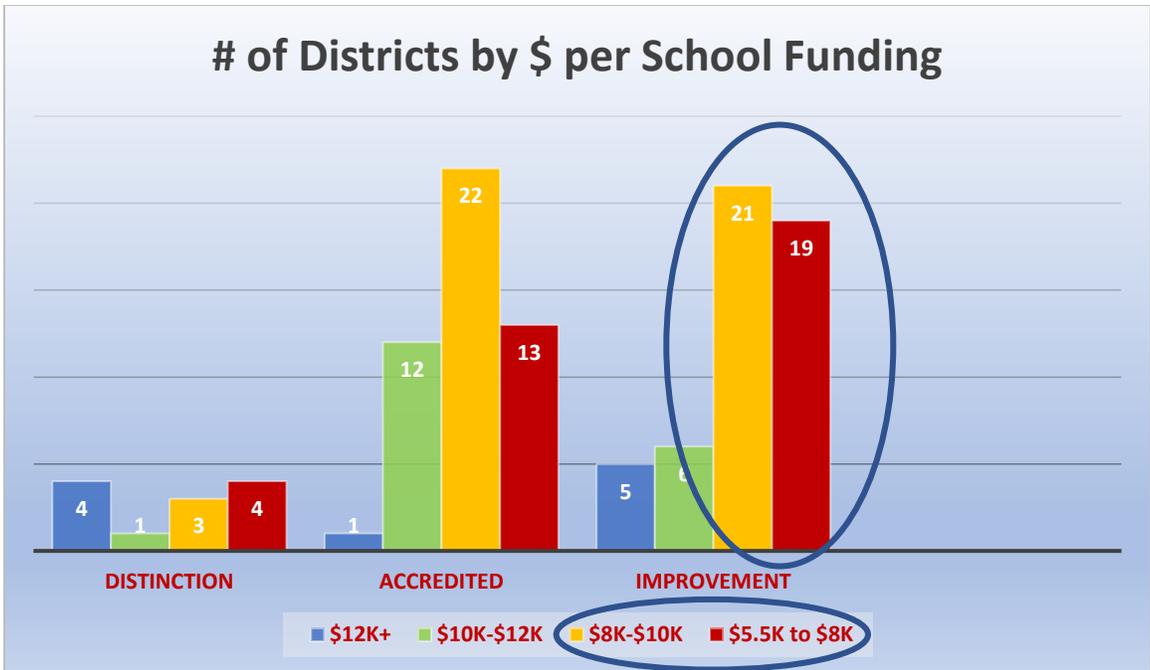
Of the 10 districts with the lowest performance ratings, 8 contribute 45% or less local taxes to their district total per student dollars. Their total per-student dollars range from \$19,260 for the Center school district to \$10,722 for Burlington school district.

Adams 14, at the 2022 bottom, educates 14,392 students and receives \$14,992 total per student. It receives 41% of funds from local taxes and only 43% from the state. It serves 92% minority students, 41% ELL, and 75%-100% FRL.

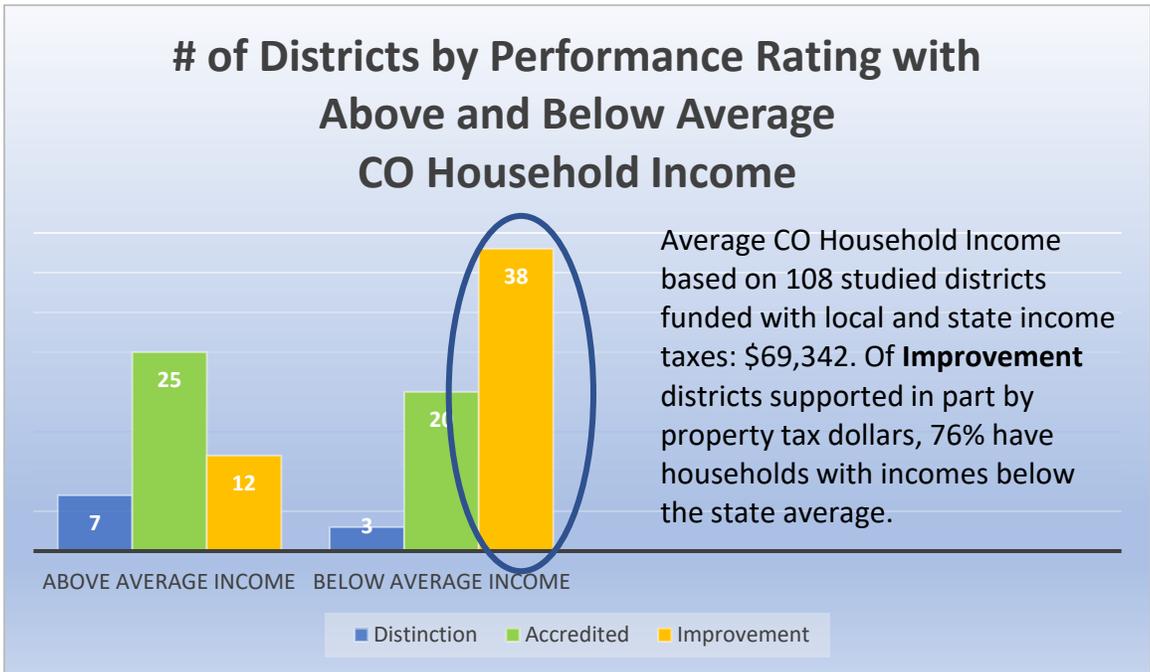
In contrast to Adams 14, Telluride has a **Distinction** performance rating. Telluride receives \$18,898 total per student and has a local property tax contribution of 70%, with 25% from the state. It educates 24% minority students, of which 15% are ELL and 0-25% are FRL.

Colorado's districts spend on average \$10,579 per student directed at the school level, \$13,509 overall. The following data cover the array of total funding per student per district and per school:

- Of 11 districts rated **Distinction**, the range of dollars per student for school level was \$15,858 (Aspen) to \$7,315 (Lewis-Palmer). Academy 20 has the highest overall population of students (26,299) of districts with a per-student school level spending of \$7,993. The district has 0%-25% of students on FRL and 2% in ELL.
- Among 48 **Accredited** districts, only 7 educate 50% to 75% with students on FRL. None of these 7 districts spends more than \$8,600 per student at the school level and all, except Harrison in El Paso County, are in rural counties. The highest local property tax contribution for these districts is 40% from Calhan RJ-2. These 7 districts' positive results are due in part to their low percent of ELL students, with the highest percent of ELL in Harrison at 11%.
- Of 52 districts rated **Improvement** –
 - 10 spend more than the state average at the school level.
 - 42 spend less than the average with the lowest per-student dollars at \$6,113; the lowest is Ellicott, which has a 49% minority population, 50% to 75% FRL, and 11% ELL.
- Of 7 districts with 75% to 100% of students on FRL, 4 receive and spend less than the state average per student at the district and school level. East Otero R-1 is at the low per-student per school end at \$7,531 for 1,358 students. Otero contributes 17% dollars from local taxes and receives 59% from state taxes. None of these districts contributes more than 42% in local taxes.



In general, districts with lower funding by district and at the school level have lower performance outcomes.



Summary of Funding Impacts

Overall, funding of school districts based on direct dollars to students at the district level is wildly unequal:

- The range runs from \$22,561 in Aspen District (**Distinction**) with 16% minority, 6% ELL, and 0-25% FRL, to \$9,706 in Lamar Re-2 (**Accredited** in 2022, **Improvement** 2023) with 63% minority, 7% ELL, and 50-75% FRL.
- The state contribution ranges from 97% to the BOCES Education Re-Envisioned district (\$8,029 – **Improvement**) to 3% for Estes Park (\$10,545 – **Accredited** in 2022, **Improvement** 2023).
- There are 19 **Improvement** districts that have per-student spending in the \$5,500 to \$8,000 per year range, and 21 with spending in the \$8,000 to \$10,000 per student per school.

Adjustments for the cost-of-living factor (for educator salaries) explain some of the differences between, for example, Aspen and Lamar RE-2. But adjustments for high percentages of students on FRL and ELL status in affected districts are grossly inadequate to the needs. Some districts simply do not receive enough per-student money no matter the reason. These include the 8 districts serving 20,375 students spending less than \$7,000 per student per school per year. These education funding, spending, and resource gaps go a long way to explain academic and opportunity gaps experienced by too many Colorado students. They relate directly to low district performance ratings.

CHARTER SCHOOL INSTITUTE PERFORMANCE RATES AND TEST PARTICIPATION LEVELS

Much argumentation exists in the state concerning the performance of charter schools vs. traditional public schools. The Charter School Institute (CSI) is considered a “district,” although its schools are distributed throughout the state. Its schools are governed by an unelected board appointed by the Governor and approved by the Legislature. The district rates Accredited with a 58% rating in 2022, 5 points above Improvement and 16 points below Distinction.

Some in the charter school world assert that these schools, due to their generous waivers from state rules and their non-union workforce, offer programs and academic success unachievable by traditional, elected-governance districts. The data suggest that charters perform at about the same level as traditional district schools with similar demographics. The state’s audit of the K-12 accountability system examines all charter schools and comes to the same conclusion. Charter programs may differ somewhat from traditional schools in the sense that they may be more narrowly focused on particular academic, arts, or science curriculum or require uniforms.

This section reviews 34 Charter Institute schools with sufficient reported data (note: this is data about schools, not districts).

- There were 7 CSI charter schools rated at the top of **Performance** in 2022. They educate about 4,100 students, just above the 3,600 students in the highest-scoring traditional district, Cheyenne Mountain.
- There are 4 high **Performance** charters, which have 16% or fewer students on FRL, and all have 5% or fewer students on ELL status. Those percentages are consistent with the districts rated Distinction (see above) and show the pervasiveness of low FRL and ELL percentages as the foundation of a Distinction rating.
- Only one high **Performance** CSI charter school rated Meets Participation of 95%+ on the state’s annual standardized testing using Total Participation calculations; 5 are described as Low

Participation, with Colorado Early Colleges in Ft. Collins at 68.9% participation in 2022 based on 1,249 students.

- There are 16 CSI charter schools rated in the lower end of **Performance** in 2022 –
 - 6 have fewer than 30% FRL students.
 - 5 have 50% or more FRL students.
 - 9 have 10% or fewer ELL students.
 - 3 have 40% or more ELL students.
- Of the 10 CSI charter schools that are on **Improvement** –
 - 2 have insufficient data to report
 - 1 has 76% FRL students.
 - 3 have 47% or more FRL students. .
 - 4 have fewer than 20% ELL students.
 - 6 showed Low Participation on CMAS tests.

Summary of CSI Performance Ratings and Testing Participation Levels

Using CSI as a proxy for charter schools authorized by school districts, as well as representing their own performance, their demographic facts have the same impact as the state’s demographic facts on traditional districts and their schools. In 2022, CSI schools had a low standardized test Total Participation rate that may affect how accurate school performance ratings are, just as test participation levels may affect the accuracy of traditional public school ratings. Low state funding disables many traditional districts from achieving their best results. Charters have more access to funds through their foundations. If the state required transparency around those dollars, CDE would have a better understanding of how extra money affects performance results. These findings are conclusive:

- Schools, charter or not, with the least challenging circumstances have the best opportunities to reach a high **Performance** (school) status, whether it is a charter offering classical learning or a district offering traditional comprehensive programs.
- Charter schools with a high percent of FRL and ELL students will, almost inevitably, have the greatest likelihood of receiving **Improvement** ratings.
- Annual CMAS Total Participation and Accountability Participation rates show that a large majority of charter schools have Low Participation and/or students missing from calculations. This fact deserves study as to why charter parents are keeping their children from taking the tests and as to the impact of Low Total and Accountability Participation on performance rating validity.

NEXT STEPS

The CDE audit of the state’s accountability and assessment system authorized by the state Legislature found that the accountability and assessment system performs as it is designed from 2010-2019. In part, this report confirms that finding. It confirms that the current CMAS annual assessments will identify districts with the highest test scores and give those schools the highest performance ratings. Those districts can just as easily, and much more cheaply in time and money, be identified by the low percentage of FRL students, ELL students, and minority students they educate.

Similarly, no CMAS assessment is necessary to identify the districts the state has assigned as needing improvement. These districts consistently have the students with the greatest education challenges: a

high percentage of students on FRL, ELL students, minority students, and not enough funding resources to make the grade.

This current analysis of data from 2022 and 2023 shows concerns unaddressed in the earlier report as times have changed. CMAS test participation rates must affect performance ratings, but it is impossible to know how much. A large majority of districts do not meet the 95% participation standard in Total Participation (the percent of eligible students who take the test). Over 44,000+ students in 2022 were missing from district results. The question is what this number means for the accuracy and validity of standardized tests as a reliable rating measure of either schools or districts.

A further indicator of obstacles for many districts that certainly affects their performance ratings is their average household income and percent of local taxes as compared to state contributions to their per student funding dollars. Too many districts with low average income residents and a low local property tax base have no opportunity to reach Distinction status because they don't receive resources necessary to achieve at that level, and their communities similarly lack resources.

Based on these factors, the state and its recently comprised HB23-1241 Accountability Task Force must substantially revise the current district and school performance rating system and its components.

SUGGESTIONS FOR ELEMENTS OF A SUCCESSFUL PUBLIC EDUCATION ASSESSMENT, ACCOUNTABILITY, AND FUNDING PROGRAM TO ACHIEVE QUALITY EDUCATION TO MEET CIVIC, CAREER, AND HIGHER EDUCATION PREPARATION CHALLENGES

Assessments

- Eliminate performance factors and assessments that do not account for instruction and learning challenges correlated with ELL, FRL, and minority student populations.
- Find alternatives to once-a-year snapshot assessments including portfolios and multiple periodic tests that show student achievement as it changes through the school year. Use these assessments as diagnostics for teachers to target ongoing instruction and for parents as indicators of their children's progress.
- Use data based on end-of-year results to develop a diagnostic analysis to give the next grade level teachers a jump-start on individual student progress.

Participation Rates

- Eliminate "snapshot" annual testing programs that have a 95% participation threshold established as "Meets" that is only occasionally achieved. It is unclear what threshold establishes validity, and validity thresholds may differ district to district and school to school.
- Use on-going assessments that, over time, will capture student progress at multiple points of assessment and timeframes.

ELL student preparation

As this report shows, districts that educate the highest percent of ELL students suffer most under the current assessment system. What needs to change for assessment:

- Students should be assessed as to their English language acquisition regularly, but they should not have an arbitrary timeline at which point they must receive their instruction and test taking in

English only. These students need to be proficient in English to have a fighting chance to show proficiency on English-only assessments.

- Language learning and bilingualism should be honored and encouraged, particularly in lower grades when language learning is easiest.

FRL (or related factors) impacts

Low income presents the greatest challenge to ELA and math achievement. For student success, more than assessments need changing. Resources need to be brought to schools and students:

- Fund and maintain health, dental, eye and hearing, and mental health resources in schools. Prioritize schools with high percent of FRL students to ensure adequate resources to support their ability to learn day-to-day.
- Develop programs to enable parents to better support their students' education needs and challenges including access to housing, food, and safety.
- Provide before and after school care and education enrichment resources at all schools with 50%+ students on FRL.

Funding

Districts and schools need resources to achieve acceptable performance outcomes. Current funding mechanisms do not mitigate the impacts of the obstacles and barriers cited in the HumRRO audit or this report. Inadequate funding undermines K-12 education especially for FRL, ELL, and minority children.

To rectify these effects, the state should:

- Establish a base of state per-student classroom funding that serves as a reasonable amount for any district to have a reasonable opportunity to provide comprehensive, quality education to students. Examine funding and achievement results across districts to determine necessary additional funding for districts with different levels of education challenges. Use data from other states to uncover likely funding amounts for every Colorado district to achieve success based on unique demographic and location characteristics.
- Cease underwriting CSI schools at the 81% state funds level, or \$250,000,000/year. Find alternative methods of funding for these schools or pump more money into traditional districts to provide equity to severely underfunded non-charter school districts.
- Create and fund a minimum state-wide educator salary scale with starting salaries to match other professions.
- Create and extra-fund professional development and salary increases for teachers working in impacted schools and in impacted instructional areas such as FRL, ELL and SPED. Include regular classroom teachers whose classrooms have above average numbers of students, ELL students, FRL students, and/or SPED students.
- Research and answer the following funding questions:
 - How many dollars per student directed to the classroom does it take to move the learning needle for FRL and ELL students to improve their education results? (The Department of Defense spends \$25,000 per student overall to achieve its better than average results. Some study as to the dollars flowing directly into the classroom per student would be helpful here).
 - How many dollars extra per student are coming into charter schools from foundations and other fund-raising sources that improve student outcomes? Understanding the impact of these dollars should offer insight into what funding is necessary to achieve better results.

- What changes to funding equations related to property tax v state funding must occur to bring more equity to per student funding?
- With declining student enrollments across many districts, and the protection of charters in some districts, how will those factors affect per student funding for students attending traditional public schools? What state policies must be established to ensure that local neighborhood schools aren't unfairly affected by school closures due to resource issues, especially when these schools serve many students on FRL status?
- What financial transparency policies should be implemented to ensure that schools are reporting all sources of funding, not just monies from local property taxes and state tax contributions?

FINAL OBSERVATIONS

This report demonstrates that test participation rates delegitimize the performance ratings of districts and schools. It shows that standardized testing results document discrimination against ELL, FRL, and minority students. While academic achievement, higher education and career preparation, as well as lifetime learning, must be the principal goals of Colorado's public education programs, **performance measures must accommodate the current demography-is-destiny correlations and funding within the system.**

Colorado's public education funding is a travesty of inequality. Districts with the least demographically challenging environments too often receive thousands of dollars more per student than districts with the most challenging environments. Even when districts with high percentages of FRL and ELL students have above state-average funding, it is clearly not enough to provide necessary as well as sufficient resources in staffing, tutoring, program development, educator salaries, and social supports to prepare students fully for their futures.

Finally, the current offered "solutions" to the state's education challenges aren't sufficient. Market-based school choice has not lifted boats carrying low income and ELL students. Declining enrollment puts additional pressure on school districts and their ability to manage their resources to deliver education quality to the very students sitting in sinking boats.

No one solution solves education problems. Educators must now stand up and lead this state past its public school ideologies. It's time for policymakers to engage with the data and use this information as a guide while acting on the urgent need to do better by the children who will decide Colorado's future.