December 18, 2009

The Honorable Arne Duncan
Secretary of Education
400 Maryland Ave. SW
Washington, D.C. 20202

Dear Mr. Secretary:

Thank you for initiating a national conversation about the reauthorization of ESEA. In response and on the following pages, the Colorado Department of Education is pleased to propose specific design elements for a redesigned, enhanced ESEA accountability system.

**Increasing state capacity** is critical. I believe SEAs must become reliable providers and brokers of high-quality support and service to the field. They must focus on both sustaining continuous improvement in schools and districts and meeting compliance obligations. To achieve this aim, SEAs will need to increase capacity by investing in research and development, program evaluation, and diagnostic school and district reviews focused on the implementation of improvement efforts. SEAs will also need to develop coherent knowledge management strategies to maintain capacity levels.

**Flexibility** is also necessary. Expanding allowable uses of these funds would allow SEAs to invest in capacity-building strategies to deliver ambitious, desired results. I believe ESEA reauthorization should extend far greater leeway in the use of federal funds at the state and local levels, but only to those SEAs that adopt a high-quality accountability system based on internationally benchmarked standards for postsecondary and workforce readiness. Incorporating these measures into the reauthorization of ESEA will go far in ensuring students are truly prepared for college or the workforce.

In closing, I echo your statements about the importance of incentives for high performance. For too long we have removed funding from schools that effectively meet the needs of our most disadvantaged students, sending the wrong signal about what we value. Thank you for your leadership.

Most sincerely,

Dwight D. Jones
Commissioner of Education
Proposed Design Elements for Reauthorized ESEA Accountability System
Colorado Department of Education

December 14, 2009

The following provides an outline of design elements for a reauthorized accountability system for the Elementary and Secondary Education Act (ESEA) as proposed by the Colorado Department of Education. The key features of this outline include establishing a new bright line goal to replace 100% proficient by 2014, alignment with expectations for postsecondary readiness, and revision of the current AYP system for evaluating school and district performance. The proposed approach is consistent with recent Colorado legislation, specifically Alignment of Preschool to Postsecondary Education (SB 08-212) and the Education Accountability Act of 2009 (SB 09-163).

As a general approach, the Department supports administrative flexibility being given to the states wherever possible in exchange for accountability. The Department believes the following specific suggestions will help move the ESEA in this direction.

The Colorado Department of Education’s suggested design elements are as follows:

1. Establish a new bright line performance goal: Annual expectation of 100% Ready by Exit – Every student a prepared graduate, ready for post-secondary and workforce success. This would eliminate the date certain of 2014 and allow each student’s needed timeline to become the focus of school and district attention.
   a. States would adopt a rigorous description of postsecondary and workforce readiness (PWR), aligned standards, and a measurement system that determines the rate of individual student growth toward and attainment of PWR.
   b. States would be accountable for making reasonable statewide progress toward the goal. States should hold districts and schools accountable.

2. Measure and report student growth and status associated with reaching PWR
   a. States would measure rates of individual longitudinal student growth and their adequacy toward PWR and attainment of standards-defined achievement levels along the way and at graduation.
   b. Each state would measure and report these growth rates and attainments for each disaggregated group.

3. Evaluate district and school performance
   a. States would establish at least four levels corresponding to performance of schools and districts on the state metrics for growth and status, based on state-defined targets for performance of schools and districts. When assigning schools and districts to performance levels, states should have discretion over how to weigh growth and status.
b. States would establish criteria for assigning schools and districts to performance levels based on disaggregated group performance and state expectations for closing gaps between groups.

c. States would specify the number of years a school or district may remain in the bottom two performance levels prior to closure/reopening. No state plan should allow schools or districts to remain in bottom two categories beyond five years. States should be permitted to allow more time for schools or districts that have demonstrated sufficient progress to move from the bottom performance level to next highest performance level.

4. Disclose performance to the public

   a. States would publically report in a transparent manner the performance of students in each school and district overall and by disaggregated groups based on the growth and status metrics established. This reporting should provide useful comparisons for parents and all other stakeholders.

5. Establish rewards and sanctions for levels of performance

   a. The Secretary should establish a system of incentives for State Education Agencies based on statewide performance.

   b. States would develop incentives (rewards and sanctions) for schools and districts associated with their performance levels. Consequences should include turnaround or other intensive intervention for the lowest performance level (for chronically underperforming schools and districts) that comprise a final effort prior to loss of authorization to operate.