Establishing Optional Measures
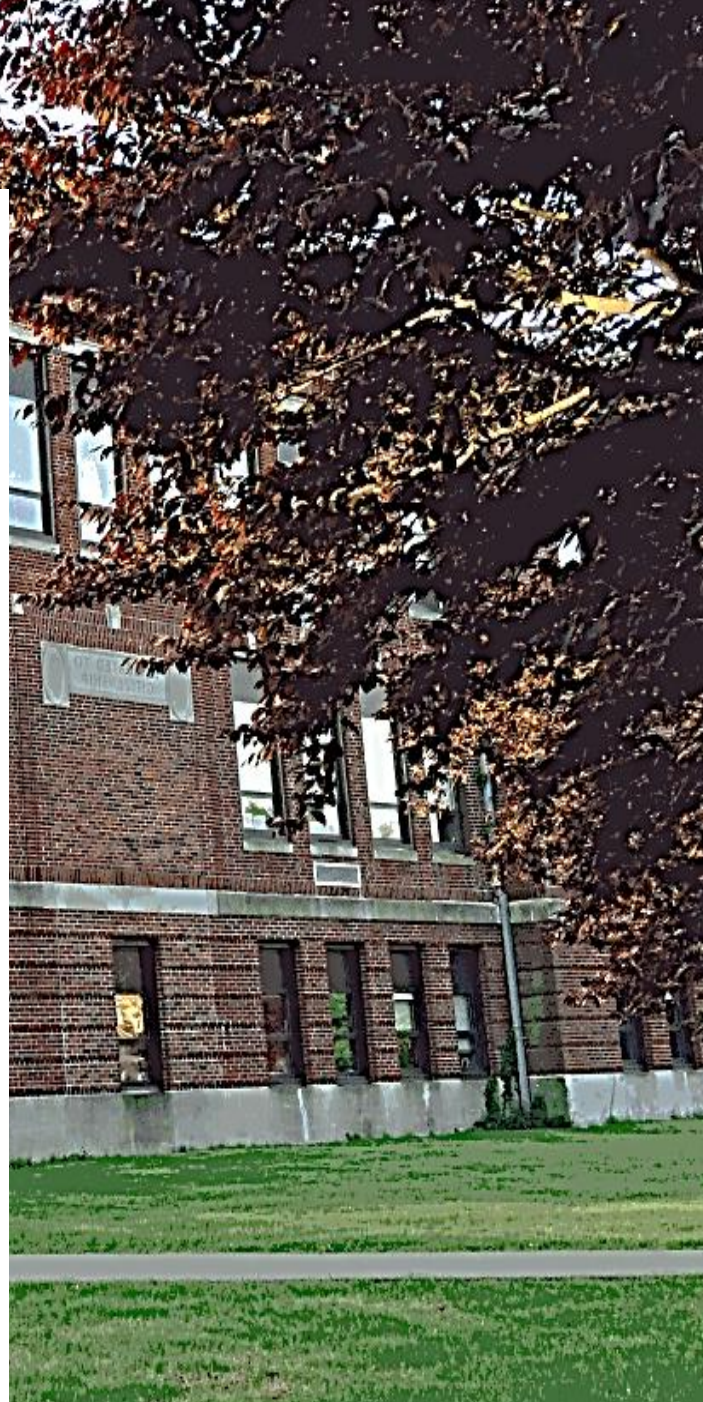
Findings from the Colorado Alternative Education Campuses (AEC) Task Force

SPRING 2018

ABOUT CSI
The Colorado Charter School Institute (CSI) is a statewide charter public school authorizer committed to creating and sustaining a portfolio of high-quality school options that meet the needs of all students. CSI authorizes 41 schools across Colorado, from Durango to Steamboat Springs and Fruita to Calhan, serving over 17,500 PK-12 students. Learn more at www.csi.state.co.us.

ABOUT SAFAL PARTNERS
Safal Partners is an education management consulting firm that brings global perspective and insight to help make lasting impact on the lives of students. Its team is made up of former teachers, administrators, nonprofit leaders, and management consulting professionals who have experienced firsthand what it takes to make lasting change. Learn more at www.safalpartners.com.

In this Report

Introduction

In the summer and fall of 2017, the Colorado Charter School Institute (CSI) convened a task force (hereafter referred to as "the group") to provide input regarding Alternative Education Campus (AEC) accountability issues. This group of stakeholders met three times to consider a broad range of issues, with a particular focus on optional measures. This report provides a summary of the recommendations and observations created by the group.

Purpose

CSI is committed to consistent and meaningful accountability for all schools as they implement their educational models, including schools designated as AECs. CSI currently authorizes three charter schools that are designated as AECs. These AECs collectively serve more than 1,100 students. CSI and the AECs in its portfolio have an acknowledged history of conflict over accountability measures that all parties would prefer to resolve. Additionally, CSI's statutory language includes an explicit challenge that CSI support schools that better serve Colorado's at-risk students.

Accordingly, CSI convened the AEC Task Force with a particular focus on helping to develop policy recommendations around the selection, submission, and verification of optional measures for AECs, and, more broadly, to explore issues around alternative accountability.

The leadership and board of CSI, in partnership with AEC stakeholders, engaged in this work to for three purposes:

1) **To ensure appropriate, transparent, and rigorous accountability and oversight** for AECs in its current portfolio and future AECs by increasing the understanding of required and optional measures and developing CSI policies and procedures and for the selection, submission, and verification of optional measures.

2) **To provide input that could be used by a broad group of stakeholders to improve AEC oversight**. This broader stakeholder community includes both charter school and non-charter school AECs and the AEC association; charter school authorizers, including CSI, all school districts, and the Colorado Association of Charter School Authorizer (CACSA); and other partners such as the Colorado Department of Education (CDE) and the Colorado League of Charter School (CLCS).

3) **To provide input to the state for changes in policy and practice**, including action by the State Board of Education (SBE) and the legislature. The bulk of this report discusses potential changes by CSI and concludes with recommend next steps for the broader stakeholder community and state policy makers.

Participants

The participants listed below were invited to join the AEC Task Force and reflect a variety of positions, including representatives of AECs currently in the CSI portfolio, board members, leadership, and staff from CSI, district authorizers, representatives of non-CSI AEC schools, experts and scholars active in the topic, representatives from the Colorado Department of Education (CDE), and representatives from the Colorado League of Charter Schools (CLCS). The work was led by the Colorado Charter School Instituted and facilitated by Alex Medler, former chair of the board of directors of CSI and currently of Safal Partners.

While a broad group of stakeholders were involved, the group did not include representatives from all stakeholder groups relating to AECs in Colorado. For example, the task force did not include non-charter representatives, current or former AEC students, or representatives from rural areas in Colorado.

Task Force Participants	Organization
Scott Bauer	University of Colorado at Denver
Parker Baxter	University of Colorado at Denver
Lorna Beckett	Colorado League of Charter Schools
Sarah Bridich	New Legacy Charter School Board Chair
Mark Connell	Colorado Spring District 11 AEC School Representative
Terry Croy Lewis	Colorado Charter School Institute
Jennifer Douglas	New Legacy School Leader
Mike Epke	New America School - Thornton School Leader
Jessica Knevals-Watson	Colorado Department Of Education
Bill Kottenstette	Colorado Department Of Education
Matthew Lanz	Denver Public Schools AEC Representative
Eric Lerum	Colorado Charter School Institute Board
Ryan Marks	Colorado Charter School Institute
Tim Matlick	Jefferson County School District Charter Liaison
Peg McMillen	Colorado Department Of Education
Dan McMinimee	New America School Colorado
Frank McNulty	Colorado Charter School Institute Board Member
Alex Medler	Safal Partners
B Sanders	Colorado Department Of Education
Dan Schaller	Colorado League of Charter Schools
Kent Seidel	University of Colorado at Denver
Ruth Smith	Colorado Springs School District 11 Charter Liaison
Annie Trujillo	New America School - Lowry School Leader
Jen Turnbull	New America School Colorado
Matthew Walsh	Jefferson County AEC School Representative
Terry Wilson	University of Colorado at Boulder

An Overview of Alternative Schools in Colorado

The Alternative Education Campus (AEC) status is a designation given by the state to public schools that meet legislated criteria, including having a student population comprised primarily of high-risk students. Through legislation, Colorado has defined AECs as schools having a specialized mission, having nontraditional methods of instruction delivery, serving students with severe limitations, and whose student population is comprised of at least 90% "high-risk" students. According to C.R.S 22-6-604.5, high-risk students are those who meet one or more of fifteen high-risk indicators (summarized to the right).

In Colorado, a foundation of legislation and strong state leadership has allowed the Colorado Department of Education (CDE) to support at-risk students in a multitude of ways. Since 2002, the state has supported the development of a robust set of high quality educational settings to ensure that students' needs are met in all educational settings, including alternative education campuses (AECs). Below is a timeline of events that led to the creation of AECs and the current system for AEC accountability:

15 High-Risk Indicators

1. Juvenile delinquent
2. Dropped out of school
3. Expelled from school
4. History of personal drug or alcohol use
5. History of personal street gang involvement
6. History of child abuse or neglect/foster care
7. Has a parent or guardian in prison
8. Has an IEP
9. Family history of domestic violence
10. Repeated school suspensions
11. Pregnant or parenting
12. Migrant child
13. Homeless child
14. History of serious psychiatric or behavioral disorder
15. Over-age/under-credited

- **2002:** C.R.S. 22-7-604.5 was constituted establishing the current definition of Alternative Education Campuses (AECs) that we largely still use today in Colorado. Originally this law was written to exclude AECs from the School Accountability Reports (SARs) which were first created in the 2000-01 school year.

- **2008:** The Colorado Coalition of Alternative Education Campuses (CCAEC) was asked by the Associate Commissioner to provide a proposal for what an alternative framework could look like. The CCAEC surveyed AECs and held multiple stakeholder meetings to develop the proposal. This provided the basic framework for what is used today. The following year, after more research and focus groups were conducted to standardize the AEC SPF, resulting in what is currently in place.

- **2009:** SB 09-163, the Colorado Education Accountability Act, provided foundation for an aligned accountability system. Through this Act it was determined that AECs, as well as all other specialized public schools, were no longer exempt from accountability.

- **2010:** Alternative Education Campuses received their first School Performance Framework (SPF) with the four performance indicators: Academic Achievement, Academic Growth, Student Engagement, and Postsecondary and Workforce Readiness.

- **2011:** AECs were allowed to select optional measures to include in the School Performance Framework.

- **2015:** HB15-1350 created the AEC accountability work group to review old and propose new accountability measures for AECs.

- **2016:** Based on the AEC work group recommendations, HB16-1429, the percentage of high-risk students in an AEC was changed from 95% to 90% high-risk and several high-risk indicators for qualification as an AEC were modified.

Alternative Accountability

AECs are accountable for achieving many of the same measures and metrics for which traditional schools are accountable. However, there are some substantive differences between the alternative and the traditional accountability system, including differences in indicators, cut points, and weightings.

1. Student Engagement
The School Performance Framework (SPF) evaluates schools and districts across standard indicators. All schools, both traditional and AECs, are measured against three primary indicators: academic achievement, academic growth, and postsecondary and workforce readiness. AECs are also measured against a student engagement indicator. The Student Engagement indicator includes the school attendance rate and the truancy rate.

	AEC SPF	Traditional SPF
Academic Achievement	✓	✓*
Academic Growth	✓	✓*
Postsecondary and Workforce Readiness	✓	✓
Student Engagement	✓	^

Figure 1. Comparison of Indicators by AEC and Traditional School Performance Framework (SPF).
*Includes disaggregated group measures on the Traditional SPF but not on the AEC SPF.
^Indicator is on the AEC SPF but not on the Traditional SPF.

The inclusion of an additional accountability indicator for AECs means the weightings of measures are slightly different from traditional schools (see figure below).
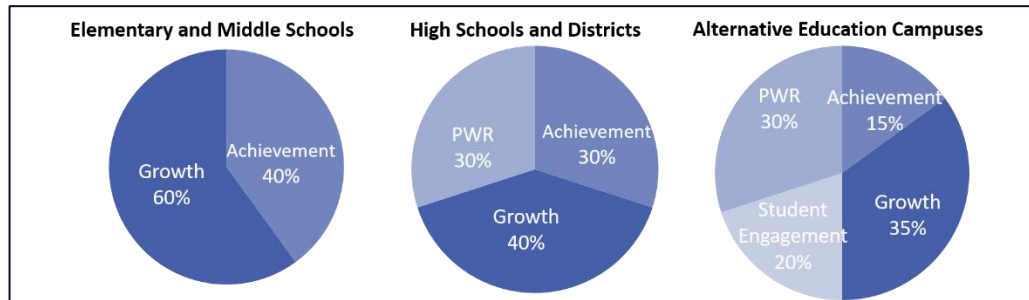
Figure 2. Weighting of accountability indicator by level and type of school (traditional and alternative).

2. Cut Points

Within common indicators, many of the same measures and metrics are the same, but different cut points have been established that are normed to an alternative population. For example, all high schools are evaluated against student performance on the SAT within the Academic Achievement indicator, but the cut point for what is considered to "meet" state expectations is different for traditional and alternative schools (see figure below).

	SAT Evidence-based Reading & Writing	Dropout Rate
Traditional school	Meets ≥ 509.2	Meets ≤ 2.0%
Alternative school	Meets ≥ 431.5	Meets ≤ 12.8%

Figure 3. Modified cut points on a sub-indicator within the Postsecondary and Workforce Readiness indicator for alternative and traditional schools for the dropout rate and SAT achievement.

3. Weighting Structures

Within indicators, there are different weighting structures (see figure below[1]) between traditional schools and AECs. Measures for the Academic Achievement and Academic Growth indicators are weighted by N size (student count). Points eligible for each measure are assigned according to the number of students who participated in each measure and measures where a greater number of students participated are worth comparatively more weight. Measures for the Student Engagement and Postsecondary and Workforce Readiness indicators are given equal weight. Points eligible are assigned according to the number of measures in the indicator and each measure is given the same number of possible points for each measure.

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[1] http://www.cde.state.co.us/accountability/calculation_guidance_for_aec_measures_4_24_17

Achievement and Growth

These indicators use N weighting

- The more students a subindicator has in the denominator, the more points it contributes to the indicator.
- Supplemental measures contribute to the Total N count when calculating measure points possible.

$$\text{Measure Points Possible} = \frac{(\text{Measure N} / \text{Total N})}{\text{Indicator Points Possible}}$$

Student Engagement and PWR

These indicators assign an equal weight by measure count

- The total points possible for a given indicator is equally divided amongst the measures in that indicator.
- Supplemental measures are included in the measure count.

$$\text{Measure Points Possible} = \frac{\text{Indicator Points Possible}}{\text{Count of Measures}}$$

Figure 4. The weighting within indicators is difference and is either weighted based on the number of students included in the measure or each measure is weighted equally.

4. Best of Rate

One measure within the Postsecondary and Workforce Readiness indicator is different for alternative schools. Traditional schools are evaluated using their best-of graduation rate while alternative schools are evaluated with their best-of completion rate. A student is considered a graduate when they complete the graduation requirements and receive a diploma while a student is considered a completer if they received a diploma or receive a GED or a non-diploma certificate. It is important to note the definition of completer includes graduates and this means the counts and rates associated with completers will always be greater than or equal to the graduation counts and rates.[2]

5. Supplemental Optional Measures

The submission of supplemental optional measures is allowed for alternative schools, and districts may opt to submit such optional measures for consideration by CDE and inclusion in the AEC SPF. Optional measures allow meaningful performance data for grades not tested with state-mandated tests, to supplement or contextualize data from state-required measures, to allow AECs to indicate whether they are successfully serving their target populations and fulfilling their mission-specific goals, and to provide an accurate and meaningful definition of student performance or outcomes that can be confidently mapped to a common AEC-appropriate expectation of student success.

Approximately half of AECs in the state submit supplemental optional measures, and there is variation in the number and type of optional measure submitted by schools and districts across the state. As mentioned before, this task force was convened to further explore and develop CSI policies and procedures and for the selection, submission, and verification of optional measures which are a part of the larger state accountability system for alternative schools.

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[2] http://www.cde.state.co.us/cdereval/gradcurrentdefinitions

Enrollment Trends at Colorado AECs[3]

In the 2017-18 school year, Colorado had 92 AECs throughout the state representing 5% of total schools in Colorado and 2% of total student enrollment. AECs also enroll higher populations of at-risk students, as shown in the chart below.

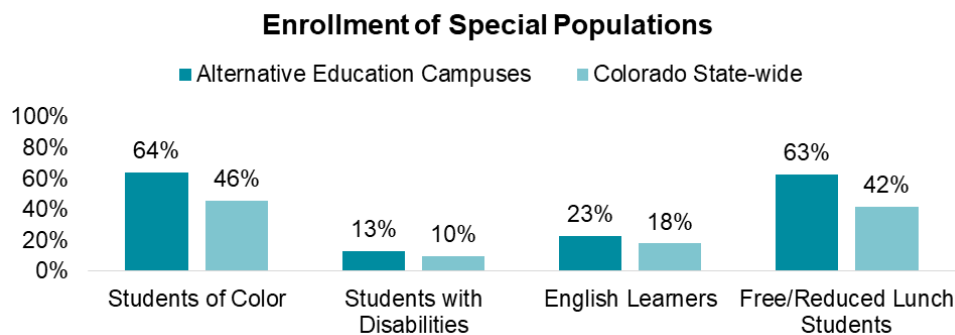*Figure 5. Enrollment comparison for at-risk student characteristics for alternative schools compared to the state enrollment for at-risk students.*

Charter schools make up about 13% of the total number of schools in Colorado while nearly one third of AECs in Colorado are charter schools (see figure below).
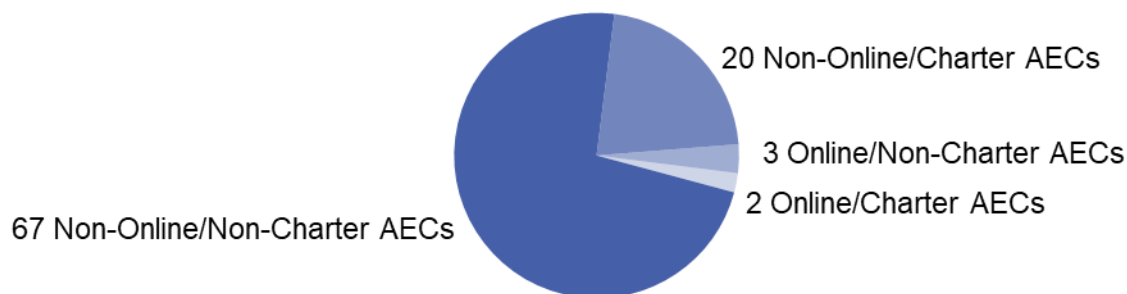

Figure 6. Type of alternative schools in Colorado in 2017-18.

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[3] https://www.cde.state.co.us/cdereval/pupilcurrent

Findings

The remainder of this report is organized around three primary questions:

1. **How can CSI improve its own process and timeline for finalizing optional measures for AECs?**
2. **How should the school and the authorizer decide which optional measures to include in the AEC School Performance Framework (SPF)?**
3. **What is required to sufficiently clarify how an optional measure is operationalized?**

The report concludes with a series of recommendations for CSI and next steps recommended for the broader stakeholder community (CDE, CLCS, and CACSA) and for state policy makers in the SBE and the legislature. Appendix A presents the revised CSI timeline and processes for the selection, submission and verification of optional measures, and Appendix B includes the draft policy submitted to the CSI Board of Directors related to alternative accountability and oversight within the CSI portfolio.

Question 1. How can we improve the process and timeline for finalizing optional measures for AECs?

The primary purpose of the group is to inform CSI's efforts to improve its own processes, policies, and procedures shaping how it oversees AECs. CSI has extensive experience with this work. To facilitate the work of the group, CSI prepared a "strawman" proposal of a new timeline and set of roles and responsibilities. The intention was to capture possible changes to how the work is conducted currently, to focus input on concrete and actionable ideas, and to demonstrate transparency on what CSI was interested in pursuing with regards to the selection, submission and verification of optional measures. The draft proposal was produced by CSI and shared electronically and in person at the group's second meeting. Limited feedback was received electronically and incorporated into a revised proposal. The group then discussed the revised proposal at its third meeting. The following notes reflect input to CSI on that revised copy. A full draft of the revised proposal is presented in Appendix A.

Much of the discussion focused on how to treat new optional measures, the annual selection of measures process, and the roles and responsibilities of various stakeholders.

For the sake of clarity and consistency, the term "selection of measures" will refer to the process by which the school and the authorizer/district identify the measures to submit to CDE and the term "submission of measures" will refer to the submission of the measures and the corresponding data by the authorizer/district to CDE

Selecting vs. Building Optional Measures

The group made a distinction between "selecting" and "building" new measures. AECs and authorizers "select" optional measures when they choose to include an optional measure that has previously been submitted by other AECs and authorizers, and thus are already approved for use by CDE. Measures are "built" when the AEC or authorizer proposes an optional measure that has not previously been approved by CDE and thus requires additional work to validate and gain approval for use in the accountability framework.

The group's primary recommendation was to make it easier to appropriately select previously approved measures from a complete list of available measures compiled by CDE for use by authorizers and AECs.

The group also described the need for increased clarity in the Calculation Guidance for Alternative Education Campuses produced by CDE. While the breadth and flexibility of the optional measure selection process is beneficial, there is little clarity about what is expected for unique or single-site measures and the guidance is sufficiently ambiguous that it could lead to multiple methods of operationalizing the measure. Given that it was beyond the scope of this group to analyze each existing measure, the group discussed the need to work with CDE and an external partner to review each measure and ensure that all submitted measures are fully operationalized, including developing appropriate cut points, before the notion of "selecting" previously approved measures becomes commonplace. CDE clarified that the calculation guidance, in some instances, is designed as a starting point for the buildout or operationalization of the potential measures in collaboration with schools. A discussion around how to fully operationalize optional measures is addressed in the response to the third question addressed by the group.

Specifically, the group discussed the CDE-recommended measure of Socio-Emotional or Psychological Adjustment, which is defined as the "percentage of students at a given AEC who demonstrate positive change on an instrument of socio-emotional or psychological adjustment." The topic of social- emotional learning needs more work by additional stakeholders, and the community should explore which specific measures of social-emotional learning are being used by AECs to ensure that the measures are truly AEC-appropriate in order to provide more specific measures from which to select optional measures.

The process for selecting previously approved measures should be different than for building new measures. If selecting previously approved measures, the selection process should focus more on how this measure meets the school's mission and students in order to judge applicability and how the measure fits within the context of other optional measures. The process for building new measures will require more work and collaboration to develop, validate, and implement the proposed measures and will necessitate a longer timeline. Despite the relatively longer length, the group recommended that all actors work to create a simple process and as short of a timeline as possible while still incorporating necessary steps. The group recommended that CACSA and other stakeholders can assist with ongoing development of new measures to share the burden. The stakeholder community can work with CDE on technical issues and make sure new measures

broadly align with the group's recommendations on what determines a good measure or develop criteria to evaluate a proposed measures.

CSI noted that they, and other authorizers, would not necessarily approve all measures on the list of measures that had been previously used by other AECs. Authorizers should be involved in evaluating measures and their appropriate use. It is not necessarily advisable or appropriate to remove the authorizer's role in deliberating with the school over the use of such measures. Moreover, a measure may be suitable or valid for a limited number of purposes or for use in certain kinds of contexts. Any list of measures used and thus approved must also make clear for what purposes and in what contexts the measure might be usable.

Annual Selection of Measures Timeline

The group agreed that the selection of measures process should be completed prior to the start of the school year (e.g. before August). Broadly speaking, there are two potential processes for the selection of measures: 1) continuation of existing measures, and 2) proposed changes (both substantial and minor) to the optional measures.

The simplest process will occur when both the AEC and the authorizer/district do not propose any changes to the previously established optional measures. This process would simply require notification by both entities regarding their shared intention to maintain existing measures and subsequent approval by both parties.

Minor changes to the optional measures (e.g. adoption of a previously approved measure) would require notification and discussion of any potential implications resulting from the change. In order to provide adequate time for these discussions to occur at the staff and board level prior to approval in August, the notification of an intent to change the previously approved measures would occur in April.

Selection of Measures

No Change to Measures				
Notification that no changes are proposed	Measures are approved by AEC and authorizer/ district			
Apr.	May	June	July	Aug.
Minor Changes to Measures				
Notification that changes are proposed	Discussion regarding proposed changes and review of proposed measures	Review of technical and accountability implications of changes, data availability, and board engagement		Measures are approved by AEC and authorizer/ district

The group indicated that the selection of measures process should be less of a negotiation and more of a collaboration. Any proposed changes will require additional steps, and while the timeline presented above shows a linear flow of events, the group recognized that much of the work occurs simultaneously and involves multiple stakeholders. Representatives from CDE indicated that the modification of an approved measure still requires CDE approval and encouraged AECs and authorizers/districts to inform and negotiate with CDE throughout the process regarding any changes to existing measures whether they are new to the AEC or are modifications of current school-level measures.

The timeline would apply for existing AECs as well as new and transfer schools into CSI that have or seek AEC status[4]. The new school application for schools proposing to become AECs requires the inclusion of draft optional measures. If approved, the new school will work to meet all pre-opening milestones and readiness tasks, including the April notification around the selection of optional measures. AECs that seek to transfer authorization are also required to submit proposed optional measures as a part of their application (which often align with their current measures). Typically, applications for transfer schools are due in December and approved in March. If approved, the transfer school will work to meet any contract conditions or milestones, including the April notification around the selection of optional measures.

As described above, the process and corresponding timeline required for the development of new measures may take more time and require more collaboration between the AEC and the authorizer/district. Full operationalization of new measures (including proposed cut points and standard setting) may take six months to a year (or longer). For a more in-depth discussion on the groups discussion regarding the operationalization of a measure, please see that section included later in this report.

The group also indicated a desire to include a process by which changes are made mid-year (should there be extenuating circumstances), but this was not discussed fully and remains an outstanding question to be resolved. The draft CSI board policy attempts to address this by including a delegation of authority to the CSI Executive Director to waive the procedural deadlines with respect approval of optional measures. However, it is expected that this would be a rare occurrence, and CSI is committed to finalizing the selection of measures in accordance with the timelines provided above.

Annual Submission of Measures Timeline

Historically, the submission of measures process between AECs and their authorizer/district aligned with the official submission of measures process administered by CDE. The official submission of measures to CDE occurs annually on June 30th and all proposed timelines should work backwards from that annual submission.

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[4] For more information about designation as an AEC in Colorado see
http://www.cde.state.co.us/accountability/stateaccountabilityaeccollections

The initial proposal shared by CSI raised questions around the capacity of school level AEC staff to provide multiple submissions throughout the year and the availability of data, especially around the end of the year. The draft proposal attempted to incorporate a mid-year check-in which would reduce the burden at the end of the year and provide adequate time to complete and verify the data prior to submission to CDE at the end of June. The group expressed a desire to explore other ways to reduce the data collection burden and suggested that the authorizer/district extract the required data (if the data was available). Initial and mid-year data submissions/pulls will allow the data to be cleaned and filtered earlier to reduce later burden at the end of the year. Additionally, oversight is improved with more data to ensure coverage and that data is collected for most students. The group strongly supported this recommendation and several participants indicated that this is a practice implemented by their authorizers.

The group also proposed that any timeline include a submission window that allows for a more flexible collection and submission of data. Many AECs operate nearly year-round and students are enrolled through June. The end of year submission should be at the school's real "end of year" and the timeline and process should allow for this (provided adequate time is available to meet the CDE submission deadline).

Submission of Measures

Aug.	Oct.	Feb.	June			
Measures are approved by AEC and authorizer/ district	Fall data submission/ data pull	Mid-year data submission/ data pull	End of year data submission/ data pull	Data validation and verification	Authorizer/ district approval of data	Measures and data are submitted to CDE
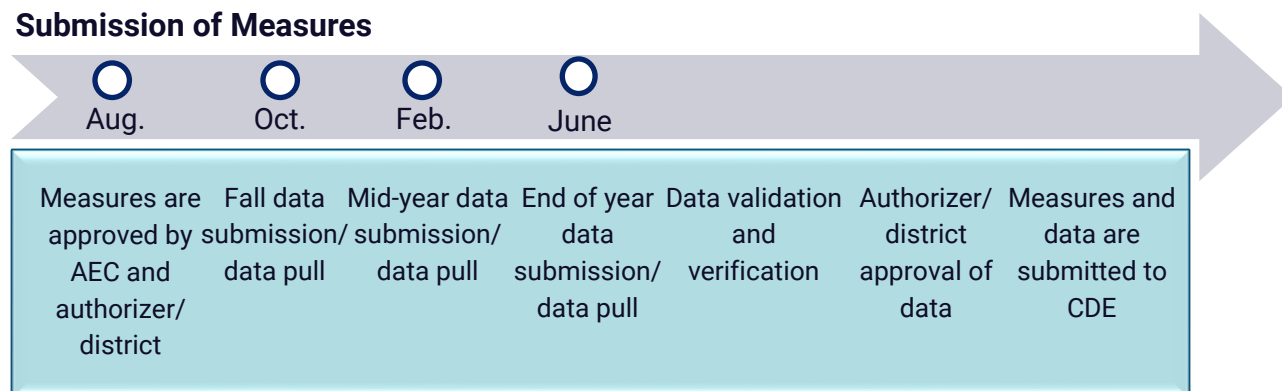
Additional Comments and Suggestions
Throughout the discussion, additional comments and suggestions were raised that could not be fully addressed during the task force or in this report.

> **Charter AEC board capacity:** The group raised the issue of continued board development and training regarding the charter school board's understanding of state and authorizer accountability. *Is authorizer confirming that the charter board is up to speed and part of the process, even if it is driven by the school staff?* Clarify what the charter board role is so that they are able to effectively review and approve optional measures. It is important for the authorizer/district to understand the charter school board's capacity and provide training (if needed). CACSA and other partners could provide some of the governance/authorizer support, and this is also a recommendation for state-level and CACSA follow-up work.

Hostile authorizers/political context: The group discussed how the selection and submission of optional measures can be politicized and appropriated by political actors or hostile authorizers. All of this work understates political interest; stakeholders must be cautious when using this report and recommendations when dealing with those that might use this information to encroach on school autonomy.

Question 2. How should the school and the authorizer decide which optional measures to include in the AEC SPF?

A large focus of the group's second meeting was focused on advice for how a school and authorizer should decide which optional measures to include in the AEC School Performance Framework (SPF). Various strategies were used to raise issues. CSI noted that the process needs to accommodate the roles of the various actors, including the authority of authorizers to approve measures, as well as the benefits of collaboration by the school and authorizer in selecting and defining measures.

Specific panels of task force participants were convened, first for those with direct experience working AEC students, and second, for researchers and scholars. Interestingly, a series of common issues were raised by both groups.

AEC Student Experience As Observed by AEC Staff and Leaders
Trust was underscored by all groups. Students and AEC faculty, authorizers and schools, and researchers, are all seeking trust and clear communication in this work. AEC representatives also explained that how people communicate matters. Too often, the school operators feel like their challenges are not acknowledged and that progress is discounted. They prefer to be able to include measures linked to their mission, even if these are more likely to reflect positively on their school, specifically because being able to talk about their progress is helpful internally and externally. In fact, school operators view mission-specific measures as more salient and celebrate the fact that these measures reflect positively on the school. Meanwhile, authorizers are responsible to many constituencies and must deal with a range of schools, some of which have harmed their trust. These issues were not easily resolved, but all parties suggested and agreed that efforts should be made to build and maintain trust (trust in the measures and also what the measures are used for), to acknowledge the needs and concerns of all sides, and to facilitate regular communication.

For school-based leaders, it was important to recognize that AEC students are not homogenous. All schools in Colorado serve at-risk students with varied levels of risk while AECs were created to serve the most at-risk youth, thus, in statute these students are called "high-risk." All AECs in Colorado serve at least 90% "high-risk" students, but school leaders articulated that within their buildings, the reasons students are considered high-risk vary tremendously and some risk factors are much more challenging to overcome than others. School operators stressed that they make decisions that are best for students even if the school might be penalized by the state's accountability system. For example, a student may re-enroll in a school, but drop out every year after a few months. The school can expect the pattern to repeat but still gladly enrolls the student to pursue its mission, knowing its dropout rate may be impacted multiple times by the same student.

Schools also explained that their schools are as heterogeneous as the students, including in their capacity to manage and analyze data. The authorizer should pay attention to this capacity, reduce burdens on schools when possible and download data and analyze it directly, rather than requiring schools to submit data.

The data used for authorizer accountability should also be considered just one of many data sets used by school stakeholders. The school has internal audiences including staff and leadership, as well as its own board, which are also interested in school outcomes. The data utilized by these internal audiences may differ from what the authorizer prioritizes. Authorizers should work to minimize the burden on schools while acknowledging that some data is more important to the authorizer and other data more useful to the school. However, if the school and authorizer have trust and clear communication, the initial indicators of trouble can lead to follow-up conversations that explore additional data that is not included in the accountability framework but which is used for internal purposes by the school.

Generally, the panel articulated that schools and authorizers tended to use fewer options than exist, and the challenges often arose from the selection of targets and cut points, rather than from the selection of the measures. More challenges were indicated for the cut points set by the State Board of Education as a part of the state system. The panel also acknowledged that changing the state's approach to cut points was work that would need to be addressed by a broader group than this task force and its members.

Researcher Observations

The researchers participating in the task force shared a series of primary observations about the current state of required and optional measures and engaged the group in a discussion about possible adjustments or changes.

The researchers noted that schools and authorizers should measure what is important, and what is measured becomes important. High-stakes measures or measures associated with accountability should, as much as possible, include triangulation among multiple data sources and methods in order to provide clarity when things are tricky, and evaluating school quality for AECs is generally very tricky. AECs tend to be smaller schools and measures are aggregated across years in order to address these typically small populations of students. The researchers suggested a cautious approach when aggregating, as these processes can mask important things.

The group discussed challenges around the use of cut points and the researchers noted that the use of confidence intervals should be considered as a norm. When appropriate and when available, confidence intervals should be reported and explained. Even when not available, confidence intervals should be considered when making high-stakes decisions.

Qualitative measures are an important aspect of evaluating a school's quality, but it might not be possible to include these measures in the school accountability framework. When exploring qualitative measures, it is important to ensure they are defined clearly to maintain rigor. The group

suggests that AECs and authorizers/district pursue collaborations to off-set the cost of qualitative measures and engage experts.

Researchers and other participants noted that, when it comes to data, school capacity varies. This means that authorizers should be sensitive to the burdens placed on schools in the creation and collection of data. To address this, authorizers can do more to pull down and analyze data.

At the same time, the group also acknowledges that historically in Colorado, some authorizers are not friendly or reasonable, and some school actors may not deserve trust. To address these trust issues, it is best to have reciprocal checking and verification of data, with raw data accessible by authorizers. In general, both schools and authorizers should strive for the highest level of transparency possible.

Discussion and Recommendations

The group discussed various recommendations. The facilitator observed that an approach used in charter school performance frameworks for school finance could be applied to AEC accountability to address several issues raised by schools, authorizers, and researchers. Many school representatives were concerned that a negative indicator on a measure would be used to inform high-stakes non-renewal decisions in isolation and without contextual analysis. Similar fears have surfaced with respect to measuring charter school financial performance. For finance frameworks, the National Association of Charter School Authorizers (NACSA) is careful to point out that the performance framework is intended as an "early warning" or "indicator" system. Rather than a measure that is considered to absolutely reflect an economic problem, a negative finding on the framework is an indication that further analysis is required, and that the authorizer and the school should engage in a deeper level of data-sharing and analysis to determine more accurately the nature of the circumstances. There may be reasonable explanations that do not indicate financial problems, or further analysis could demonstrate that a school is in economic peril.

Trust is eroded quickly when data are used inappropriately – that is, to make decisions that the data neither warrant nor were intended to inform. Accountability measures should first and foremost be used to strengthen schools and ensure the most suitable programming for the schools' students; in only rare and extreme – meaning persistent -- cases should the data lead to school closure. In this context, being accountable means making corrective decisions based on the application of data in decision making.

The group discussed whether, for AEC accountability, a similar approach may resolve some of the tensions. While accountability data may lead to the conclusion that something is amiss; it generally cannot tell decision makers what the root causes of this might be. Under this approach, the measures in a performance framework can be used to indicate when further analysis is needed. If the first level of measures indicate that outcomes are acceptable, further analysis is not necessary. If, however, initial data appears problematic, additional data and clear communication are needed to ensure that the school and the authorizer can better understand and evaluate the school's performance. This is often the way that charter school accountability works in practice. It also is an

opportunity for schools to share data that is often created initially to inform internal deliberations or program improvement.[5]

This requires clarity about data to be attained earlier in a school's life cycle. The authorizers are seeking agreement on the data early, so that they are not engaging in a conflict over which data to examine once things have entered into a deeper review brought about by problematic results. The initial selection of measures can include the identification of performance levels that should trigger further analysis, and the follow-up data can be determined early as well. That way the parties are not re-arbitrating conflict over what to measure, and instead are communicating with one another about the nature of the challenge and what both parties understand about the situation and the interpretation of the data.

A third suggestion was to encourage authorizers to partner with schools in this second tier of work to provide assistance. To continue the themes of transparency, tiered intervention, and better communication, the authorizer may want to partner with a school as they analyze additional data together and consider next steps for improvement, if the data indicate improvement is needed.

The expectation that authorizers would help struggling schools improve can be problematic under the approach to performance management that NACSA recommends, but many authorizers find it helpful to balance the roles of performance management and oversight - partnering to help produce improvement. Authorizers might provide schools with in-depth analysis to measure the extent to which schools meet expectations and help schools identify truly significant trends using both state and local data. While this analysis might help inform the school's data narrative, notable trends, progress monitoring, target setting, and performance challenge components of their improvement planning process, the school would still be responsible for identifying underlying causes of performance and determining major improvement strategies.

If there is sufficient trust and communication, CSI and the group participants thought that a more collaborative and shared approach to improvement could complement a two-tiered approach to performance management.[6]

The group concluded this portion of the work by considering examples of measures regarding postsecondary and workforce readiness (PWR) and student perception surveys. The following

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[5] CSI currently utilizes this approach for its Equity and Access Screener. The Screener is designed to assess the quality of access, instructional supports, and outcomes for special populations and assist CSI in providing focused support to schools struggling to meet specific performance goals for these students. The tool consists of performance indicators, a primary and secondary screener and associated data entry templates, performance indicator rubric, and scoring tool. The primary screener, which uses a subset of the identified measures, identifies which schools require interventions and supports while the secondary screening tool, which uses a separate set of measures related to the first, is used to hone in on specific areas to target in a School Support Plan.

[6] A similar approach is currently utilized for the CSI Equity and Access Screener (produced by CSI for all schools) and the School Support Plan (developed by the school in partnership with CSI). It should be noted that CSI is the Local Education Agency (LEA) and must ensure appropriate oversight for the provision of services for special populations.

issues were raised during this discussion and recommended for consideration as schools and authorizers consider what measures to add as well as how to establish targets and cut points

For PWR, participants noted the following:

- Focus on the big picture when evaluating post-secondary success and consider all options for students including continued education and workforce participation

- Acceptance to higher education should not be discounted, especially taking into account the perceived risk of some students to put their name and address on forms in the current political climate. Schools can require students to apply, and even if they do not go, they have gained skill of applying. Note, authorizers questioned whether this is measuring student outcomes or adult actions.

- Some measures produce outcomes that are consistently high and lack variability from year to year (such as acceptance to institutions of higher education). Under the indicator system, this measure could be flagged for additional follow-up through complementary data or a follow-up analysis that would drill down into the student outcomes. In this example above, follow-up is not just conducted because of a "negative" trigger (i.e. low performance), but because of a "positive" trigger (i.e. consistently high performance). The use of the indicator approach might create a system that fits multiple measures together in a way that build trustworthiness and reliability. Many follow-up measures are possible, including:
    - How many enroll;
    - Persevere or persist;
    - Higher education graduation; and
    - Workforce participation

- Researchers noted the importance of working with a logic model and a theory of change. These tools can help clarify what should get measured and why.

- When authorizers and schools add measures, they can consider many aspects, not just whether the measure will produce a wide range of potential outcomes. They can consider a measure's separate contribution to understanding the school. A particular measure may be appropriate because it adds some information on a priority of the school, for example, even if it is not expected to vary a great deal. In that way, the school might, for example, have confidence that an outcome they value and that is a priority is reflected in the discussion of their performance. In picking the mix of measures, these sorts of considerations should be explored by the school and the authorizer.

- Individual student success as measured by standard PWR measures is often correlated with other measures of success such as behavior, attendance and other social emotional learning outcomes, academic preparation, and "systems navigation" so it is important to understand and think about how measures interact.

For the example of student perception surveys, the participants noted:
- Student perception surveys can provide valuable information for schools to utilize as a part of their improvement planning process and for horizontal accountability. Student perception surveys have been included as an optional measure, and it is common for these to be district-wide surveys, common network surveys, or surveys adopted for use by a single school from other districts or networks. Authorizers shared their concern that some

questions on an existing district-wide student perception survey appear out of the AECs control, but the participating AECs were less concerned about this possibility.

- Schools argued that the student perception surveys administered at other network schools were successful in gaining useful information. As a network, having consistent data across multiple schools is desirable. Authorizers should respect this desire for cross-campus comparability and ease in gathering and analysis that comes with scale.

- When evaluating proposed student perception measures (and other optional measures), the group discussed whether authorizers should be obliged to accept all of the optional measures that have been previously accepted by other authorizers/district. Can the reputation or standard of the authorizer be evaluated when considering measures used elsewhere? When evaluating each proposed measure the group noted that stakeholders should consider the CDE stamp of approval and other authorizers' records.

Question 3. What is required to sufficiently clarify how an optional measure will be operationalized?

The group discussion on the third question focused on two issues: first, how a school and an authorizer should set cut points or targets (and what to do in the case of a disagreement); and second, how to decide which students are included in a measure. The observations for each are presented below, and are intended to inform broader discussions over the selection and refinement of optional measures.

Setting Cut Points

Researchers suggested that there are three common approaches to setting targets or cut points. They offered observations about concepts that scholars consider when evaluating performance on measures. In the field of authorizing, it is not necessarily required to go through these three approaches, but the group found them useful to discuss.

1. Norming to a population

Cut scores can be established using a norming process that is designed to compare and rank scores in relation to one another. Norm-referenced measures compare scores against the performance results of a statistically selected group of test takers, typically of the same age or grade level, whose performance has already been documented on the specific measure. The setting of cut scores on widely used tests in educational contexts requires the involvement of policymakers, educators, measurement professionals, and others in a multi-stage, judgmental process. Cut scores should be based on a generally accepted methodology and reflect the judgments of qualified people. Establishing norms also requires an appropriate comparison group (a population that is similar to the population being measured). The challenge for using norms for optional measures is determining a truly comparable comparison group and accessing enough data to validly and reliably calculate a norm.

2. Predictive expectation

Cut scores can be established based on predictors for what the student needs to be able to do to be successful at the next level. The cut point is establish based on a prediction that succeeding at the next level requires a particular level of achievement (or other outcome). For example, in order to be successful in the workforce upon graduation, students must achieve a certain level of performance. Researchers noted that this approach is not often used because it can be difficult to determine an appropriate cut point for a given population, and it is challenging to set predictive expectations that are appropriate for all student trajectories.

Clarifying predictive expectations could be a good topic to follow up with broader community in order to have larger conversations with stakeholders that have access to additional data from schools that serve a similar population. Discussions around student behavior and appropriate school-level targets might be an interesting topic for this work.

3. Intervention-based triggers

Cut points can be established based on an intervention they could trigger. If interventions, like closure, are already understood, then cut points for performance would be based on the judgement that such an intervention matched the outcome. For example, if charter non-renewal is the intervention triggered by a cut point, then the cut point should match the severity of the intervention. If the intervention is less of an existential threat to a school, as in the case of an obligation to report on a problem of non-compliance, than the cut point should be set at a higher-level of performance than if the trigger was directly linked to non-renewal. An example of this is a multi-tiered systems of support. For charter accountability, perhaps the bar is established based on the expected authorizer intervention as well as the student level interventions. If one level is reached, further authorizer study is required. The notion of a multi-tiered set of interventions, including follow-up analysis, could inform this approach.

When considering these three standards, participants noted the following:

- Intervention can mean many things in the authorizer world: formal notice, raise issue, non-renewal.
- Norming will require more analysis, and it is important to seek understanding first, but over time, the school may face closure, turmoil, and stress that may be undue if measures are not appropriately normed. Do not understate the need for quality measures with accurate cut points or underestimate the distraction and harm of inappropriate measures or cut points.
- Measures should be attainable and capable of reflecting the success and growth by the school. Attainable measures also allow a school to demonstrate change.
- Variability in outcomes makes the measure more useful. Ask: are they never met or always met?
- Allow for follow-up measures that are not cut point oriented, but reflect continuous variables, especially given the aggregation of three years of data on the AEC SPF. While the aggregation of data resolves issues associated with small populations, it makes it more challenging to show progress.

- Statistical analyses may yield a better understanding of school outcomes. It might be helpful to consider non-linear effects and complex modeling techniques may produce more helpful insights into effect size for various measures. The broader community (including partner researchers) may be able to help with more sophisticated analyses.

Additionally, the group discussed a process by which targets and cut points could be set during the measure building process. The group indicated that the targets set for the measure informed their decision-making process around whether the measure should be included as an optional measure. Some participants noted that the CDE standard 40/60/90 target structure for optional measures is not appropriate for many potential optional measures. Participants noted that there are existing optional measures with non-standard cut points, and the group expressed a desire to further explore the possibility of clarifying how optional measures' non-standard cut points might be developed and approved.

The group discussed at length the challenges associated with the cut points for existing state-required measures, specifically the cut points for attendance and truancy. The group recommended that state-level attendance cut points be re-normed and expressed concern regarding the schools included in the norming set, specifically AECs serving incarcerated youth or schools serving only students with an Individualized Education Program. Following the completion of the task force, CDE has indicated that these measures were re-normed in 2016 and are not scheduled to be re-normed in 2018. Additionally, CDE completed additional analyses of the attendance data and did not find a significant change in the cut points when accounting for various outliers[7].

Similar to a recommendation that was included in the 2015 AEC Accountability Workgroup Report[8], the group discussed the possibility of comparing outcomes for students with a similar risk-profile. This recommendation was not funded or implemented after 2015.

Student Inclusion
The group discussed how to decide which students to include in the measure as a part of the operationalization of optional measures.

1. Reasonable Coverage
A first question is whether the measure covers a reasonable proportion of the students enrolled at the school. Establishing reasonable/minimum coverage requirements is important to ensure that the measure accurately reflects the student population. Measures that only capture a small proportion of students may be problematic. Previous optional measures have included coverage rates of 85%. For growth measures (or other measures that require two measurements), it is important to understand the impact that student mobility has on the ability of the school to obtain two data points and meet

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[7] As a result of continued interest, CDE committed to completing a study of attendance and truancy data on the AEC SPF and releasing the results to field following completion of the study.
[8] The results from the Workgroup Report are posted on the CDE website:
https://www.cde.state.co.us/accountability/2015_aec_awg_final_report

reasonable/minimum coverage requirements. Note that some state-required measures include some measures with very low participation (e.g., PARCC-CMAS), and it is important to consider how to handle these measures (e.g., through n-weighting).

The group noted that, while uncommon, authorizers have not approved optional measures for inclusion on the AEC SPF if they did not meet reasonable/minimum coverage requirements.

2. Mobility

When evaluating which students are included in the measure, it is important to consider potential selection bias, or whether the measure is valid given how short the "treatment" is for students who don't stay in the school for long. Some state achievement and growth measures only evaluate students who are continuously enrolled, and schools have the ability with optional measures to reflect the performance of all students served at the AEC, including students who may be more mobile than their peers. Measures should consider how well the school serves students that are continuously enrolled as well as students who attend for a shorter duration. Operationalization of measures should address issues around student mobility when determining which students to include and exclude. Some authorizers set a minimum number of instructional days (e.g., Denver Public Schools requires that students with an enrollment of at least 40 instructional days be included). This discussion should also consider how the mission of the AEC may create systemic issues with mobility (e.g., a school for pregnant and parenting teens).

It was noted that there is an inherent tension between mobility and reasonable coverage, especially for growth measure.

3. Random Samples

The group suggests that random samples of students be considered as an option for AEC accountability. However, as noted by the group, AEC students are not all alike, and it would be challenging to get a representative sample of students at an AEC. Additionally, this recommendation is not in alignment with the Education Accountability Act (SB09-163) and could not be included as a part of the state accountability framework.

4. Visit Schools and Observe

The group indicated that authorizers should see the reality in schools to better understand the complications related to interim assessment administration stemming from the logistical challenges related to make-up tests and assessment windows, and how to motivate students and ensure testing takes place with disengaged kids or those with spotty attendance as unengaged test-takers may be disproportionately high in AECs. The group recommends that authorizers establish a visitation schedule or system so they are in the building during testing windows. These visits can add qualitative information and may reduce some of the tension and provide common material for communication. School visits may precipitate a turning point for authorizers when they see what the school is doing and can help contextualize the cut points; however, it is also important to note that authorizers

(and members of authorizing boards) can have strong ideas about what school should look like, which may have other implications for the school.

5. Personalized Measurement
The group discussed the notion that the expectation that while all measures may not capture all students, individual measures captures each student. The group briefly discussed how to explore personalization of measures by student depending on their trajectory and individual goals. It was noted that this measure would result in data that may be too small to be reportable or highly unstable from year to year and that this approach would not solve the challenges articulated in the report and discussed throughout the task force.

Recommendations & Next Steps

The recommendations included in this report do not reflect consensus among all participants in the group. The group did not use a formal voting process, and instead used an informal process to signal general support for conclusions. The group worked to incorporate and accommodate the perspective of all stakeholders as much as possible. In a few instances, however, a disagreement was substantial and could not be resolved during the group's deliberations, and these cases are noted throughout the report. In most cases, the group was able to provide a shared recommendation. The observations and recommendations that follow are presented for consideration by CSI and other stakeholders and should not be taken to imply support or agreement by individual participants or their affiliated organizations.

The discussions raised many challenges, considerations, and recommendations that go beyond the scope of the task force. Group members described challenges, and the group broadly agreed that challenges with current accountability frameworks, specifically the state-required measures and the corresponding cut points, directly impact the process used to select measures. The group acknowledged that progress can be made in selecting optional measures, but tensions will persist because of the perceived unfairness of state-required measures. This report focuses on the narrow questions specifically addressed by the task force, and concludes with a series of recommendations to the broader stakeholder community to address the larger system.

For CSI

The group concluded its work by brainstorming a list of potential activities for CSI. The steps below are in addition to efforts to incorporate specific recommendations in the previous pages and focus on processes, communication and follow-up work.

- Revise the strawman outlining CSI procedures and timeline. When a revised copy is ready, release this to the field, including the broader community, and incorporate the feedback.

- Seek dialogue with more schools and explore issues that could not be addressed in more detail. Consider future opportunities to explore issues raised here in more detail and to incorporate input from the broader community.

- Produce a report that captures lessons learned from all stakeholder throughout task force and summarizes conclusions (this report). Include any issues that need further discussion or attention and note issues of disagreement in that report as needed.

- Share the full draft of report electronically and gather feedback from stakeholders. Inform the CSI Board of this deliberation and continue the discussion among CSI's board and staff.

- Use recommendations and discussion from the task force and the report to inform the development of CSI Board policy development regarding the selection of optional measures and corresponding guidance.

For CACSA, AEC's, and other Stakeholders

The group brainstormed a list of activities for the broader community of stakeholders. The group recognized that for many of these tasks CSI and some of the stakeholders included would not be appropriate parties to convene or lead follow-up work, but that CSI and group participants could help prompt and participate in many of these steps.

- Gather data and analysis of currently used measures in Colorado.

- Work with CDE and stakeholders to create an expanded bank of robust and useable measures so that more schools and authorizers can benefit from previous work without having to create new measures and identify measures that are most likely to be useful (with similar school purpose and student populations).

- Provide input on re-norming of attendance and truancy measures.

- Improve and expand social emotional learning measures, including work around new CDE measures and experts on this topic.

- Look at potential new measures for development, including those used in other states.

- Work with experts in general and explore how to provide resources that make it possible for researchers and experts to support this work.

- Provide technical assistance to boards of schools, and to authorizers and authorizer boards, so they are more familiar with AECs, AEC accountability, and optional measures and their use.

- Encourage decision makers (including authorizers, school board members, and district staff), to spend more time in schools.

- Engage with non-charter AEC communities to better understand the similarities and differences across AECs. Non-charter AECs should be incorporated into follow-up work.

- Help authorizers understand that measures, which may be likely to produce positive outcomes, may nevertheless still be likely to be positive for the school's efforts and can be fundamental to mission.

- Complete an analysis of empirical questions around the measures currently used, and the results schools have as reported against these measures, and conduct outreach and engagement with stakeholders.

- Promote greater data literacy among various stakeholders.

- Conduct analyses of how measures look in other settings to inform understanding of reasonable targets and cut points.

- Explore the idea of indicator system as framing strategy like NACSA approach to finance system.

For CDE, State Leaders, and Policymakers

The group brainstormed changes that could be adopted by policymakers. The group acknowledged that some participants in the group may not be the best advocates for these changes, but they did recommend outreach and communication with the appropriate policymakers. There was a sense that some changes could be enacted by CDE staff without change in policy while other changes could be enacted by the State Board of Education (SBE). SBE changes could be enacted with guidance to staff, as well as though potential changes in regulation or rule. Changes in state policy through the legislature were expected to be less likely, but still possible. In policy follow-up, it was expected that various participants could work with their own groups or though affiliations to increase understanding of these issues and act strategically to advance these types of issues.

- Consider unfinished business of 2015 AEC Work Group and its recommendations.

- Qualitative measures can be useful for authorizers to explore. Researchers and other stakeholders can work cooperatively to develop and build resources in support of the work to minimize the work placed on school staff. State resources could help this work.

- Cut point recommendations need to be delivered and a strategy developed to inform the selection of cut points by CDE and the SBE.

- Participate in improving the bank of existing measures and make it more user-friendly.

- Engage state stakeholders through outreach and advocacy to develop a better understanding of AECs and the students they serve.

- Ask CDE to add resources (perhaps from Charter School Program Grant) and consider working with outside partners, such as the Colorado League of Charter Schools (CLCS) and the Colorado Coalition of AEC association.

Appendices

Appendix A: The CSI Proposed Timeline and Procedures for AEC Performance Measures

CSI Revised Draft Timeline and Procedures

Selection of Measures

No Change to Measures

Notification that no changes are proposed

Measures are approved by AEC and authorizer/ district

Apr.	May	June	July	Aug.

Minor Changes to Measures

Notification that changes are proposed	Discussion regarding proposed changes and review of proposed measures	Review of technical and accountability implications of changes, data availability, and board engagement	Measures are approved by AEC and authorizer/ district

Submission of Measures

Aug.	Oct.	Feb.	June

Measures are approved by AEC and authorizer/ district	Fall data submission/ data pull	Mid-year data submission/ data pull	End of year data submission/ data pull	Data validation and verification	Authorizer/ district approval of data	Measures and data are submitted to CDE

Appendix B: CSI Board Policy on AEC Accountability

ALTERNATIVE EDUCATION CAMPUS (AEC) OPTIONAL MEASURES POLICY

In carrying out its mission of fostering high-quality public school choices, including particularly schools that are focused on closing the achievement gap for at-risk students, the Charter School Institute Board (the "Board") is dedicated to providing a high level of autonomy to its Alternative Education Campuses ("AEC") in setting optional accountability measures that more accurately reflect student performance in the AEC environment.

School Accreditation
The Institute is responsible for holding its schools accountable such that their academic programs meet or exceed state and local expectations for levels of attainment on the statewide performance indicators, as annually measured by the CSI Annual Review of Schools (CARS) (or its replacement).

Through CARS, the Institute accredits each of its schools in accordance with state laws and regulations and the Institute Accreditation Policy. CARS includes categories that are comparable to the accreditation categories for the Institute and emphasizes school attainment of the statewide performance indicators. In the Institute's discretion, the Institute may include additional accreditation indicators and measures adopted by the Institute and as measured in CARS. The Institute accreditation system may also include additional measures specifically for those schools designated as Alternative Education Campuses in accordance with 1 CCR 301-57. Generally, these optional measures will allow for an evaluation of meaningful performance data for grades not tested with state-mandated tests, allow for AECs to provide data that is specific to the unique nature of their programs, and help to supplement and contextualize data from state-required measures.

Optional Measure Process
By means of this policy, CSI Staff is directed to establish the process and timelines pursuant to which Institute AECs propose optional measures. It is the intent of the Institute Board that, to the extent possible, CSI Staff and Institute AECs finalize AEC optional measures prior to commencement of the school year for which the optional measures would apply, with the proposed optional measures being presented to the Board for approval shortly thereafter. The Institute Executive Director is delegated the authority to waive the procedural deadlines with respect to Board approval of optional measures but may not waive Colorado Department of Education ("CDE") timelines

Optional Measure Criteria
It is the intent of the Board that Institute Schools designated as AECs have broad flexibility in establishing optional accountability measures that reflect the unique mission of the AEC, while ensuring that any approved optional measures meet state requirements, and are valid, reliable, and consistent with best practice. Accordingly, when developing and reviewing optional measures, the Institute AEC and the Institute shall consider the following pursuant to 1 CCR 301-57:

1. Whether the measures fairly evaluate the performance of the AEC based on the size and distinctive student population and mission of the school, and whether those measures can reasonably demonstrate successful change in student attitudes, behaviors, and performance;
2. Whether the targets are achievable but ambitious, and allow for evaluation of progress toward attainment on each of the state performance indicators;
3. Whether the measures and targets reflect expectations established for students becoming postsecondary and workforce ready as described in C.R.S. § 22-7-1001, *et seq.* and C.R.S. § 22-2-136;
4. Whether the measures and targets recognize and make appropriate use of well-established or widespread existing practices in education of High-Risk Students or subgroups of such students; and
5. Whether the measures and targets are based on data that will allow CDE to collect, evaluate, and, if needed, audit said data.

In addition, as evidence of whether the proposed measures are valid, reliable, and consistent with best practice, the Board and the Institute AEC shall consider the following:
1. For both individual and collective measures, whether the measures are inclusive of all students and meet minimum data point and participation rate criteria to the extent possible;
2. Whether the number of optional measures set forth by the AEC is comparable to the number of state measures;
3. Whether the measures are focused on outcomes as opposed to inputs. and
4. To the extent possible, the measures shall be designed to carry over from year-to-year in order to allow for an accurate comparison over time.

Effective Date
This policy will be effective as of the date of Board approval for implementation during the 2018-19 school year.

Adopted: April 17, 2018

LEGAL AUTHORITY: C.R.S. § 22-2-136. Additional duty – state board – individual career and academic plans – standards – rules.
C.R.S. § 22-7-1001, *et seq.* Preschool to Postsecondary Education Alignment Act.
C.R.S. § 22-11-101, *et seq.* Education Accountability Act of 2009.
C.R.S. § 22-11-207. Accreditation categories – criteria – rules.
C.R.S. § 22-11-307. Accreditation of public schools.
C.R.S. § 22-30.5-505(3)(b). Board duty to adopt policy for accreditation of Institute Schools.
C.R.S. § 22-30.5-507(2)(c). Institute Schools subject to accreditation by Board.
1 CCR 301-1. Rules for the Administration of the Accreditation of School Districts.
1 CCR 301-57. Rules for the Administration of Accountability for Alternative Campuses.