



POSITION PAPER:

**AUDIT OF STATE ACCOUNTABILITY/ACCREDITATION SYSTEM**

**A4PEP supports HB21-1294 which calls for an independent third-party audit of our public education accountability system to determine whether it is meeting the needs of all Colorado students.**

Advocates for Public Education Policy believes that this audit is vitally necessary, particularly because the accountability system was adopted mainly to comply with federal testing requirements, but it has ceased improving students' literacy and math skills and has resulted in an over-reliance on test scores for evaluation of student learning and instruction.

**We believe that an audit of the accountability/accreditation system is (over)due.**

- The state's accountability/accreditation system was adopted over a decade ago - to align Colorado's system with No Child Left Behind (NCLB). There has been no evaluation of its success in all that time.
- Five years ago, NCLB was reauthorized as Every Student Succeeds Act (ESSA), but Colorado has not made any changes to our system to align with the changes in ESSA.

**We believe that test-based accountability has narrowed the curriculum.**

- Because of NCLB's reliance on test scores for evaluation of student learning and instruction, the state system has a similar basis, using consecutive-year testing for the "growth model" in the system. Only two subjects are used in the growth model: reading/English language arts and math (although science testing, which is done in only 3 grade levels, is also mandated).
- The focus on federally required standardized testing has resulted in less instruction time dedicated to subjects including other subjects that are highly valued. "In recent years, the emphasis in public education has been squarely placed on the areas of reading, writing, mathematics, and science, but it is important to emphasize public education's historic mission for active participation in democracy." – Colorado state statute 22-7-1002)(1)(c)
- "The need to meet specific testing standards pressures teachers to 'teach to the test' rather than providing a broad curriculum." ([american.edu/blog/effects-of-standardized-testing](http://american.edu/blog/effects-of-standardized-testing))

**We believe that standardized testing has negatively impacted schools and classroom instruction.**

- "Teachers have expressed frustration about the time it takes to prepare for and administer tests. Achievement test scores can place unfair blame on good teachers if scores are low and obscure teaching deficiencies if scores are high." ([american.edu/blog/effects-of-standardized-testing](http://american.edu/blog/effects-of-standardized-testing))
- Current mandated interventions imposed on low-performing schools – firing the teachers, converting to a charter school, or turning the school over to a private management company – are punitive, unfair, costly, and ineffective.

**We know that standardized tests have a cultural bias.**

- “Too often, test designers rely on questions which assume background knowledge more often held by white, middle-class students.” (Oakland School District Manager of Performance)
- “When standardized testing is biased against minorities and those from lower socioeconomic status, it can encourage racism and misconceptions about people from those backgrounds. (Leadership Project - Columbia Univ Teacher College)”
- “If the cultural or linguistic backgrounds of the individuals being tested are not adequately represented in the norming group, the validity and reliability of the tests are questionable when used with such individuals.” (International Journal of Critical Pedagogy)

**We see that the system is not closing the “Achievement Gap” as it was supposed to do.**

- Even schools with very few low-income students still have a large achievement gap between the students from low-income families and the others. (School View on CDE’s website)
- The current test-based accountability system has failed to close the achievement gap between schools with mostly poor students and those with very few. “Poverty correlates very strongly with academic results. Schools with low test scores nearly always have a lot of families living in poverty. Schools without a lot of poverty and/or English language learners nearly always have good scores. This correlation is very stable. The connection between poverty and education results is one of the most enduring relationships in education research. It shows up everywhere.” (EDU100.org/lessons/poverty)



**FROM:** Bayfield Board of Education

**RE:** *K-12 Education Accountability Systems Performance Audit* (House Bill 21-1294)

**DATE:** April 26, 2021

If we have learned nothing else from the COVID Pandemic, we have experienced the fact Colorado's future is determined by the strength of our public schools. During this crisis, our public schools have continued to educate, and even to feed and comfort, our children. We also believe it is important to have a school accountability and accreditation system that is of high quality, extremely accurate, and advances achievement for all students. Toward this end, the Bayfield Board of Education wants to express our support for the house bill, *K-12 Education Accountability Systems Performance Audit* or House Bill 21-1294.

Over a decade ago, the legislature passed a law called the "Education Accountability Act of 2009," which established the current accreditation and accountability frameworks for grading our public schools. We do not believe "grading" our schools is easy to accomplish because of the complex and human relationship work happening at each schoolhouse.

To further complicate the matter, since its passage, there have been a number of changes in the accountability and accreditation systems, including changes in the performance indicators and how they are measured, changes in the Colorado Growth Model and how it is applied, and changes in the statewide targets for performance set by the State Board of Education. Additionally, there have been changes regarding the state academic standards, the number, timing and the content of statewide assessments, the statewide assessments administered in grades nine through twelve, the postsecondary and workforce readiness programs, and the high school diploma endorsements. Finally, with the passage of the federal Every Student Succeeds Act, or ESSA, there are additional federally-mandated requirements for state accountability systems.

All of these developments call into question the efficacy of the state's current accreditation and accountability systems. Simply stated, our current system for grading public schools is not working. Moreover, the school accountability frameworks do not provide stakeholders with a fair, complete, and accurate picture of school and district quality.

Representatives Shannon Bird (D-Westminster) and Serena Gonzales-Gutierrez (D-Denver) and Senator Robert Rodriquez (D-Denver) have sponsored this legislation directing the Colorado State Auditor to audit the accountability measures, outcomes, and systems. We have an opportunity now to review the data collected from over 10 years of compliance mandates and unfunded mandates and find out if we are measuring what counts.

This COVID crisis has proven the human and economic value of our public school in Colorado. We believe Coloradans deserve to receive comprehensive, accurate, and credible information about how well their public schools are performing. This audit bill will explore important questions that will either build confidence in our existing systems or inform us of ways we can improve our public schools in the future. Even in our complex world today, we urge immediate passage of this law for all Colorado students.

Respectfully,

Mr. Mike Foutz  
President

Mrs. Daniele Hillyer  
Vice President

Mrs. Amy Davlin  
Secretary/Treasurer

Dr. MaryLynne Herr  
Board Member

Mrs. Debbie Wilhelm  
Board Member

*Bayfield School District 10 Jt-R*

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## Do you really know how well public schools are doing?

Colorado's future will be determined by the strength and effectiveness of our public schools. It is now more important than ever that we have a school accountability and accreditation system that is meaningful, accurate, fair, and ensures we are advancing achievement and success for all students. Toward this end, we write to express our support for HB21-1294, Education Accountability Systems Performance Audit, and call for your help in ensuring its passage during the 2021 legislative session.

Over a decade ago, the Colorado legislature passed the "Education Accountability Act of 2009," which created the accreditation and accountability system for grading our public schools. The objectives of the law were noble and focused on maximizing every student's progress toward postsecondary and workforce readiness. The intent was to move from a punitive system to a positive one focused on learning.

We don't believe the law is working as intended and believe now is the time to revisit it and find out which parts of it have failed, and which parts of it are working. Academic scores for the past decade have not improved at the state level so there is no justification to keep the system "as is."

The list of changes since the creation of the Education Accountability Act of 2009 are numerous: Performance indicators and their measurements are different as are the Colorado Growth Model and the statewide targets for performance set by the State Board of Education. There have also been changes in state academic standards, the number and timing of statewide assessments and other measures of academic success. Finally, with the passage of the Every Student Succeeds Act (ESSA), there are new federally mandated requirements for state accountability systems.

Additionally, concerns about equity and systemic racism have risen to the top of almost every policy discussion. We observe that almost all of the state's "turnaround" school districts and schools have high concentrations of underrepresented populations. Their status is, in almost all cases, merely a reflection of the demographics of the student population.

Significantly, more and more colleges are publicly stating that they will no longer be using SAT/ACT scores for college admissions because they lack confidence in the test's ability to predict academic potential and their failure to adequately measure variables surrounding ethnic inclusivity and diversity.

All of these changes and developments call into question the efficacy of the state's current accreditation and accountability system and cause us to ask: Is the current system for grading and ranking public schools working? Are the results of the system racially or ethnically biased?

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Does the current accreditation and accountability system provide constituents with a meaningful, complete, and accurate picture of school and district quality? And, is the system creating the level of innovation required to meet the life demands of future graduates?

Rep. Shannon Bird, Rep. Serena Gonzales-Gutierrez, and Sen. Robert Rodriguez have brought forward HB21-1294 directing the State Auditor to examine these questions more closely. We have an opportunity now to review data representative of the entire state that has been collected over 10 years of compliance with the current system rules and to find out if we are measuring what really matters. The disruption caused by the COVID-19 pandemic provides the ideal opportunity to reexamine the law and make needed changes.

We strongly support this legislation. It protects our democracy and empowers future generations to live successful prosperous lives. We believe Coloradans deserve comprehensive, accurate, and credible information about how well their public schools are performing. HB21-1294 explores important questions that will either build confidence in our existing accreditation and accountability system or inform us of ways we can improve the outcomes of our public schools for the future.

We are in this together. Please contact your local legislators today and ask them to support public education by voting in support of HB21-1294.

Sincerely,

Colorado Superintendents

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Adams County School District 14

Chris Fiedler  
Adams County School District 27J

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Rick Lovato  
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Bonnie Aaron  
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Chris Whetzel  
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May 4, 2021

The Honorable Barbara Hall McLachlan  
Chair, House Education Committee  
Colorado General Assembly  
200 E Colfax, Room 307  
Denver, CO 80203

Dear Chair McLachlan and Committee Members:

Re: Support for HB21-1294 – K-12 Education Accountability Systems Performance Audit

Colorado's aspirational public education system is falling far short of its promise and we need to find out why. Unconscionable demographic and geographic disparities stubbornly persist throughout Colorado among student outcomes after more than a decade of implementing a system designed to provide the education each and every K-12 student needs to succeed after high school.

A comprehensive audit of Colorado's statewide system of standards and assessments and its statewide education accountability system (collectively, the "Framework") is critically needed. The Framework as a system was designed and has been implemented across Colorado with the best of intentions. The strength and ultimate value of this system is the opportunity a "systems approach" provides for progressive, sustained improvements; building on the things that work and moving away from well-intended, but nonproductive policies and practices.

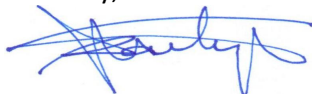
We now have more than a decade of data documenting the Framework's performance regarding education outcomes for students by demographic group and geographic location. The lack of substantive progress improving overall student outcomes is disheartening. The Framework is not achieving its goal.

An audit of the Framework as provided by HB21-1294 is the essential next step. It will help us identify what is working. It will establish a factual basis for policy makers as they consider future revisions of the Framework. It will lead to progressive improvements designed to move Colorado's public education system closer to delivering on its aspirational vision of providing excellent education outcomes for each and every student regardless of demographic or geographic disparities.

Although I am an elected member of the Board of Education of the St. Vrain Valley School District and the President Elect of the Colorado Association of School Boards, I am submitting this testimony in wholehearted support of HB21-1294 as an individual and former high school science department chair with more than a decade of teaching experience.

In 2008 many of us in classrooms experienced the unevenness in achievement levels among our students belonging to various demographic groups and welcomed Colorado's aspirational initiative to establish an improved statewide public education system, intentionally designed to provide high quality education outcomes for each and every student, regardless of demographic group or geographic location. The Framework is falling far short of its promise. HB21-1294's audit is an essential step to get back on track.

Sincerely,



Richard Martyr, Ph.D.