

TO: Colorado State Board of Education
FROM: Advocates for Public Education Policy – Dr. Jo Ann Fujioka, Sen. Evie Hudak, Dr. Ed Krug, Sen. Michael Merrifield, Hon. Sue Marinelli, Rep. Judy Solano, Manuel Solano, Esq., and Sen. Sue Windels
RE: Deadline for UIP

We would like to suggest a major change to the State Board of Education’s rules regarding the Administration of Statewide Accountability Measures for the Colorado Public School System that the SBE approved at the June 2020 meeting. We disagree with the change to extend the submission deadline for the Unified Improvement Plan to October 15, 2020.

We do not think that merely postponing the due date to October is a realistic solution to the situation our schools and districts are in due to the coronavirus pandemic. The cancellation of the state assessments this past spring means that there are no new test scores to use. Thus, it is impossible to determine whether there were any changes or improvements to the previous District Performance Framework or School Performance Framework, and it is impossible to make new plans or set new goals based on non-existent test scores. Also, without test scores from standardized tests for the 2019-2020 school year, there would be no way to follow trends for another two years at a minimum. The Unified Improvement Plan process will not be useful in planning, regardless of how long its deadline is delayed.

Even if it were feasible for schools and districts to make new plans by October, which we believe it isn’t, there is a significant likelihood that the coming school year will not return to what we think of as “normal” either. Most importantly, the disruption to student learning that occurred during the Stay-at-Home period is likely to be so large that all schools and districts will have major setbacks in student achievement. The entire UIP process is based on the concept of improvement; thus, the performance of all schools and districts is likely to drop, making any system of holding schools and districts accountable for making improvements unrealistic and making the entire current system of accountability worthless.

Furthermore, due to uncertainty about how schools will operate in the fall, many leaders are delaying planning decisions, so that they can respond to the constantly changing socio-political environment and updated guidance from health experts, which will significantly impact their improvement strategies. Even with an October deadline, there is not enough time for authentic improvement planning. Even during normal circumstances, there is evidence to suggest that school improvement planning is often more about meeting requirements than strategically aligning strategies to the root causes of a problem. The UIP process requires gathering and reviewing data, assessing the current performance, and identifying significant trends and root causes before identifying improvement strategies, and with such disruption to the last few months of schooling, those steps will be difficult, if not impossible, for schools to complete. Under these circumstances, completion of the UIP is likely to become a **compliance activity only** and not a reliable way to support performance management in schools.

We believe that an entirely new UIP will be necessary to be developed to hold our public education system accountable. We believe the best way for the SBE to proceed is to **suspend the UIP requirements** for at least another year or two. Meanwhile, we urge the State Board to hold public hearings to take input on what is realistic to use for accountability during the period when everyone is affected by the pandemic and come up with a new plan.