

Memo

To: BVSD Board of Education

From: BVSD District Accountability Committee (DAC)

Date: Oct 10, 2022

Re: DAC Recommendations on the 2022-24 District Unified Improvement Plan (UIP)

To fulfill the DAC responsibility:

C.R.S. 22-11-302(1)(b) – To advise its local school board concerning preparation of, and annually submit to the local school board recommendations regarding the contents of, a district performance, improvement, priority improvement, or turnaround plan, whichever is required based on the school district's accreditation category. In advising and preparing the recommendations, the school district accountability committee shall make reasonable efforts to consult in a substantive manner with the school accountability committees of the school district.

Broad Recommendations for the District's Unified Improvement Plan

- To meet the statutory responsibilities of the DAC, the UIP must be drafted prior to September of each year to allow for more feedback, edits and implementation. By drafting a plan prior to September, the district provides the critical time needed to assure that adequate metrics, processes and expectations can be set for the district, and at every school, prior to the plan's formal adoption. This year, the UIP was shared with the DAC on 15 September for review by 11 October, a timeline that meant that there was only one DAC meeting before the review was due and constrained the ability of the DAC and other stakeholders to engage. We appreciate the opportunity for review but would encourage earlier engagement in the future.
- The DAC commends the District for clearly aligning the 2022-2024 BVSD UIP to the strategic plan, and for including implementation benchmarks and action steps for each Priority Performance Challenge (PPC) identified.
- As a broad comment across the UIP, the DAC commends the focus on inequities in outcomes as targets for improvement but notes that the root causes identified in the UIP do not acknowledge the role of institutional racism and structural bias as drivers of these inequities (whether conscious or unconscious, and in individuals or as a byproduct of systems and administrative structures). Without such identification, we believe that implementations designed to reduce inequitable outcomes will fail to achieve as much as they otherwise could. To address this issue, leadership from DAC, the Latino Parent Advisory Council (CAPL), and the Parents of Color Council (POCC) met to review and provide feedback regarding this issue in the UIP. Substantive recommendations and language addressing the role of institutional racism and structural bias have been added to the draft UIP and shared with the district (See Appendix A).
- The UIP is designed to develop clear, concise and quantifiable progress monitoring measures to assess the impact of the plan. While we have some comments on this below, we want to acknowledge the valuable work done to develop indicators and the associated regular release of data on these indicators. In our opinion, the PPCs and Major Improvement Strategies are well defined, but the action steps and implementation benchmarks are not well designed and do not always provide clear connections to the targets. There are many input indicators and some impact/outcome indicators, however there are almost no output indicators. For example when the UIP references that they hire xyz person, but there are no metrics in place to track what xyz person actually did in support of the initiative. Without anchoring in metrics, it is unclear how schools, the district and the DAC can monitor the plan's implementation (benchmarks and action steps). In addition, anchoring metrics help the district and board determine whether they are pursuing the right plan to accomplish their goals. Substantive edits and comments have been added to the draft UIP (See appendix B).

- As a broad comment across the UIP, at several points specific staff within the schools, particularly teachers, are targeted for engagement around issues such as discipline, tracking into special education, or other specific points relating to the UIP. While teachers are obviously key decision makers, generally speaking we would encourage BVSD to consider what other staff within the schools are engaging with students and should be targeted for training or additional supports in meeting UIP goals.
- We call for the UIP both directly and in the process around it to explicitly address the role of the DAC, the SACs, and other parent engagement groups in progress monitoring, data review cycles, oversight and the improvement planning process overall.

Specific Recommendations for the 2022-2024 District UIP

Based on the draft 2022-2024 UIP shared with the DAC on September 15, 2022, the DAC has the following observations and recommendations:

- PPC - Inequitable Discipline: The 2022-2024 UIP is commended for incorporating an explicit focus on positive behavioral interventions and restorative justice as a major improvement strategy. We recommend tracking the origin of discipline referrals to ensure that the groups referring students for discipline are being targeted by the interventions to reduce disproportionate discipline. For example, there is no data on what share of discipline referrals come from staff other than teachers. Including these groups in any implicit bias training and monitoring the ongoing impact of that training on discipline referrals of these other groups is essential. In addition, the UIP focuses on changing the makeup of discipline referrals but does not include a corresponding target for overall discipline referrals. Thus, BVSD could have increased discipline referrals and still meet its stated targets. Consider adding a target for the number of overall referrals or suspensions that the other targets are linked to (e.g. maintain or reduce the number of suspensions).
- PPC - Priority Performance Challenge: Achievement and growth gaps. The current proposed plan of action calls for both an approach based on a multi-tiered system of supports and more individualized engagement, but the action steps tend to emphasize approaches to standardize instruction. Action steps which emphasize identifying and providing additional supports or interventionists to help target individual student needs may be more in line with the stated goals.
- PPC - Large Disparities in Academic Acceleration: It is not clear how the action plans and implementation benchmarks will achieve the intended result of equitable academic opportunities. In particular, we note that;
 - Lack of clear, consistent acceleration paths are noted as a root cause, but creating those paths outside of the area of mathematics are not described.
 - If the root causes and major improvement strategies are to be evidence based, baseline data for enrollment in, and access to, accelerated courses should be included. Measuring subsequent change in access to courses is equally important to enrollment in courses.
 - Options for acceleration still involve a high degree of choice, by school leaders, to participate which perpetuates systemic inequities. Efforts and incentives should support uptake and implementation of acceleration pathways available through the district.
 - One of the implementation benchmarks is **“Publish and communicate course pathways and tools for students and families, identifying mechanisms for students to shift pathways if needed and systems for equitably identifying students for acceleration and increasing the number of students from under-represented groups in advanced math courses.”** This seems to include two goals - each focused on a different stakeholder - and each a significant effort. Consider separating.
 - The Elementary school academic acceleration benchmarks include a move towards online course offerings. While this may give all students the same options, it is unclear how this will

decrease barriers for underrepresented students to participate in advanced coursework, especially at the elementary school level where students may need more support that may not be readily accessible virtually. We commend the district's efforts to provide access to technology to facilitate the transition to virtual learning during the pandemic. Despite these efforts CMAS data highlight how disparities across student populations have maintained and in some cases widened during virtual learning necessitated by the pandemic.

- Priority Performance Challenge : Disproportionate identification for special education
 - The metric for determining success for this challenge is set as “Decrease the percentage of identified students who are Latinx to 27%, compared with being 20% of the population. Decrease the percentage of students identified for special education services who are eligible for free or reduced lunch to 35%”
 - This metric assumes that rates of need for special education services are equal across all subgroups, rather than allowing for the possibility that Latinx students or students accessing free or reduced lunch may have higher rates of need for additional services. Our understanding of the extant literature on this is that this assumption is not necessarily founded: while inequitable identification may be the result of bias and a misidentification of underlying needs, it is also the case that different groups may have different underlying patterns of need. An outcome metric which forces an assumption of equality of need may not map onto the actual need across groups.
 - More broadly, this metric runs the risk that it may create incentives for staff to deny students access to needed services: it explicitly creates a metric that judges success by not enrolling students into special education services. A better approach may be to align success more with the proposed interventions, and assess success by the proportion of kids identified as needing special education services whose identification is confirmed to have involved a culturally-sensitive assessment delivered in the language spoken at home or other tool allowing for a validation of the identification.
- As we called for in the last UIP memo, we encourage BVSD to include data trends and performance targets for gifted students as part of the Gifted Addenda, or to be integrated into the district's overall plan. Currently, the UIP lists statistics for Gifted and Talented students that are included in the Current Performance recital but, as written, appears to be included only as a comparison against Latinx students and students receiving free and reduced lunch. Consider rewording.
- Several of the annual performance targets do not have corresponding metrics described in the UIP. For instance, suspension data is described earlier in the UIP using different breakdowns of students than those provided in the performance targets, so the reader does not know what change the targets represent.
- There are performance targets for dual enrollments but no corresponding discussion about the current status and trends for dual enrollments.
- The interim measures for the performance targets should have clear action items and periods of review (e.g. quarterly).

Appendix A:

[Draft UIP 2022-2023 school year with comments addressing inclusion of institutional racism and structural bias.](#)

Appendix B:

[Draft UIP 2022-2023 school year with comments addressing general edits and comments.](#)

Appendix C:

The *Quality Criteria Rubric for Evaluating District Unified Improvement Plans UIPs*, published by the Colorado Department of Education (CDE), was used as a tool to evaluate this year's UIP. This rubric can be found on the CDE website at: <https://www.cde.state.co.us/uip/quality-criteria-rubric-district-uip-2020-21-pdf>