# Assessment Participation and Accountability

## Overview

This resource describes assessment participation requirements and the role of participation in both state and federal accountability. This resource assumes knowledge about the **federal accountability** and **state accountability** processes. See the links for additional information. Use this resource to help build understanding of the terminology and policies around participation that impact performance framework ratings and federal identifications.

## What are the state and federal requirements for assessment participation?

### Colorado Assessments & Participation Requirements

Consistent with federal statute, state law requires assessments for evaluating students' mastery of and growth in the Colorado Academic Standards and evaluating the performance of districts and schools. State law requires annual state assessments for third- through eighth- grade students in English language arts and math, as well as science once in elementary, once in middle school, and once in high school. (C.R.S. 22-7-1006.3(1)(a)).

While federal statute requires reading/literacy and math for one grade in high school, state law requires assessments for evaluating students' mastery of the Colorado Academic Standards and post- secondary readiness with a ninth grade assessment (C.R.S. 22-7-1006.3(2)(a)), a tenth-grade assessment (C.R.S. 22-7-1006.3(2)(a. 5)) and an eleventh-grade assessment (C.R.S 22-7-1006.3(2)(b)).

### State Law Regarding Parent Excusals from State Assessments

House Bill 15-1323 requires school districts to adopt a policy on how parents can excuse their students from a state assessment. Colorado Revised Statutes, 22-7-1013(8)(A-C) establishes how districts and schools shall implement this policy, summarized below:

A. Districts and schools shall adopt and implement a written policy and procedure by which a student's parent may excuse the student from participating in one or more of the state assessments.
B. If a parent excuses his or her student from participating in a state assessment, a district or school shall not impose negative consequences, including prohibiting school attendance, imposing an unexcused absence, or prohibiting participation in extracurricular activities, on the student or on the parent.
C. A district or school shall not impose an unreasonable burden or requirement on a student that would discourage the student from taking a state assessment or encourage the student's parent to excuse the student from taking the state assessment.

## Federal Participation Requirements

Federal law, the Every Students Succeeds Act (ESSA), like No Child Left Behind before it, requires a 95 percent participation rate. From SEC 1005 (c)(4)(E)(i,iii), States must:

- Annually measure the achievement of not less than 95 percent of all students, and 95 percent of all students in each subgroup of students, who are enrolled in public schools on the assessment, and
- Provide a clear and understandable explanation of how the State will factor "the 95 percent participation requirement" into the statewide accountability system.

## How are assessment participation rates calculated for accountability purposes?

### Calculation Terminology

- **Participants:** Students who were eligible to test that were counted as participating in state assessments.
- **Non-participants:** Students who were eligible to test that were not counted as participating in state assessments (e.g., student absence, parent excusal)

### Total Participation Rates

*Description of the Rate Calculation:* Total participation rates combine all the assessment records for each subject area (English, math and science) across all grade levels within a given school or district. For multi-level schools and districts that serve high school, the PSAT/SAT Reading and Writing results are combined with the English language arts results. Parent excusals are counted as non-participants (they are included in the denominator). Total participation rates best reflect the actual percentage of students enrolled that participated in testing.

*Use in Data Analysis and Improvement Planning:* This participation rate should be considered when using assessment and growth data for improvement planning and/or other instructional purposes. Total participation is the preferred metric as it is a better indicator of how representative the tested student population was of the entire school or district population.

*Use in State Accountability:* Total participation is included in the performance frameworks to provide context for interpreting how representative the reported results are likely to be of the entire student population. Typically districts and schools with more than 95% total participation in two content areas receive a "Meets 95% Participation" descriptor. Districts or schools with less than 95% total participation in two content areas receive a "Low Total Participation" descriptor. These descriptors do not impact the calculation of the frameworks. The rate can be viewed in Figure 1 and Figure 2 as the "Total Participation Rate."

Two framework ratings are relevant to low participation numbers.

Insufficient State Data (ISD) ratings are assigned when the state does not have enough data to determine a district rating or school plan type. This is defined as a district or school lacking reportable data for one or more of the following performance sub-indicators for every level (elementary, middle, or high school) served by the school: ELA Achievement, ELA Growth, Math Achievement, or Math Growth. Often this is related to the size of the school or district or the specific population served. In these cases, an additional descriptor may appear along with the Insufficient State Data rating. The "Small Tested Population" descriptor refers to schools and districts that do not enroll enough students, even with the multi-year framework, to calculate a performance rating. The "No Students at Grade Levels Tested for State Assessments" descriptor refers to schools that operate programs for students that do not test on the state assessments (e.g., a school that serves only grades K-2).

**NEW in 2026**—Insufficient State Data: Low Participation ratings are assigned when a district or school has a total participation rate under 25% on one or more of the state ELA or Math assessments and does not qualify for the Small Tested or No Students in Tested Grades descriptors. Statute requires this Low Participation designation include parent excusals as non-participants, indicating that there are not enough students testing

on state assessments to accurately describe the performance of the district or school. All schools or districts with an ISD: Low Participation rating will be required to develop a Participation Action plan.

*Use in Federal Accountability:* Federal statute (ESSA) requires assessment of a minimum of 95% of students in the required content areas and grades indicated above. CDE uses a two-phase ESSA identification methodology. In the first phase, schools are identified for ESSA support and improvement based on the available assessment results. In the second phase, schools with less than 95% total participation rates that are not already identified for support and improvement, will be included in a second round of identification analyses, wherein all non-participants in excess of 5 percent are counted as non-proficient records (assigned the lowest obtainable scale score available on each assessment) for the Academic Achievement indicator. Schools identified during the second phase have the phrase "Due to Participation Only" following their ESSA identification category.

## Accountability Participation Rates

*Description of the Rate Calculation:* The rules for accountability participation rates are the same as those for the total participation rate except that parent excusals are removed from the numerator and denominator. As shown in Figure 1 and Figure 2 below, valid scores represent the numerator. Multilingual learners (MLs) who have been in the U.S. for less than one year also count as participants (they are included in the numerator and denominator) for the ELA test regardless of whether they received a valid test score.

*Use in Data Analysis and Improvement Planning:* This metric is not recommended for use in analysis or improvement planning. Total participation is the preferred metric as it is a better indicator of how representative the tested student population was of the entire school or district population.

*Use in State Accountability:* If the district or school has accountability participation rates below 95% in two content areas, the overall rating is reduced by one level (see Decreased due to Participation, below). As of 2024, CMAS Science participation rates will not be used in the calculation to lower school and district ratings. As noted above, parent excusals do not contribute to a Decreased due to Participation decision.

*Use in Federal Accountability:* This rate is not used in any federal accountability calculations.

*Figure 1. Performance Framework Participation Table*

**Total Participation:** Parent Excusals are counted as non-participants

**Accountability Participation:** Parent Excusals are excluded from calculation

**Rating:** Reflects whether **accountability participation** rate meets or exceeds 95%

**Test Participation Rates and Total Participation Rate Descriptor***

| Subject | Total Records | Valid Scores | Total Participation Rate | Parent Excusals | Accountability Participation Rate | Rating |
|---|---|---|---|---|---|---|
| English Language Arts | 88 | 80 | 90.9% | 8 | 100.0% | Meets 95% Participation |
| Math | 88 | 80 | 90.9% | 8 | 100.0% | Meets 95% Participation |

| Total Participation Rate Descriptor for Planning Purposes: | Does Not Meet 95% Total Participation |
|---|---|

**Total Participation Rate Descriptor:** Reflects whether **total participation** rate meets or exceeds 95%

*Figure 2. Performance Framework Participation Table*

$$\text{Total Participation} = \frac{\text{Valid Records}}{\text{Total Records}}$$

$$\text{Accountability Participation} = \frac{\text{Valid Records}}{\text{Total Records - Parent Excusals}}$$

For more details on participation rate calculations, see the **Calculation Guidebook** available on the Accountability Resources webpage.

## What happens if my school or district does not meet the 95 percent *accountability* participation rate requirement?

### State Policy Regarding Participation Requirements

Schools and districts are accountable for meeting minimum participation rates in the state assessments. If a school or district falls below the 95 percent accountability participation rate (i.e., for **reasons other than parent excusal**) in Math or English language arts/Evidence-based reading and writing, then the district's accreditation rating or school's plan type will be lowered by one level and a descriptor of "Decreased due to participation" added. CMAS Science participation rates are not used in the calculation to lower school and district ratings.

CDE's policy for the impact of low participation is based on State Board of Education Rule and the February 2015 State Board of Education motion that districts will not be penalized by a lowering of their accreditation rating should their accountability participation rates fall below 95 percent on the state assessments due to parental excusals. The State Board of Education rules (1 CCR 301-1 5.02) state: "Information concerning the percentage of students enrolled in the District's or Institute's Public Schools who are not tested on the Statewide Assessments will not be factored into the analysis of the District's or Institute's attainment on the performance indicators, but will be factored into the Accreditation category assignment." Districts still must

engage in good faith efforts to test all students in accordance with state and federal law and maintain documentation of parent excusals.

## What happens if my school or district lacks sufficient reportable data, regardless of total participation rate?

The site will be assigned an Insufficient State Data rating with an additional descriptor of either "Small Tested Population" or "No Students at Grade Levels Tested for State Assessments" if the school or district lacks reportable data for one or more of the ELA Achievement, ELA Growth, Math Achievement, or Math Growth sub-indicators for every EMH level served by the school or district.

"Small Tested Population" refers to schools and districts that do not enroll enough students, even with the multi-year framework, to calculate a performance rating. "No Students at Grade Levels Tested for State Assessments" refers to schools that operate programs for students that do not test on the state assessments (e.g., a school that serves only grades K-2). **Districts may select a plan type for schools with either of these designations during the district and school accreditation process using their own locally developed criteria**.

## What happens if my school or district does not meet the 25 percent *total* participation rate requirement?

Starting with the 2026 Frameworks, schools and districts with less than a 25% total participation rate but who do not qualify for the "Small Tested Population" or "No Students at Grade Levels" descriptors will receive a rating of Insufficient State Data: Low participation on the framework. These sites will be required to submit a Participation Action plan. If the site receives an Insufficient State Data: Low Participation rating for three consecutive years, they will be required to report to the State Board of Education.

## What happens if my school or district has a *total* participation rate at or above 25 percent, but an *accountability* participation rating below 95 percent?

Schools and districts with low total participation rates **for any reason** will receive a note in the participation descriptor field that indicates that the site's results may not be representative of the entire student population. For example, a school that earns a Performance Plan, but has a total participation rate of 58 percent will receive an informational descriptor of "Less Than 95% Total Participation" on the first page of their performance framework.

The table below summarizes the possible combinations of Framework Ratings and Participation Descriptors. Remember, the Accountability Participation rate does not include parent excusals while the Total Participation Rate includes parent excusals.

Note: Figures in red below indicate a value that falls outside the participation cutoff for accountability or total participation rates.

| Accountability Participation Rate | Total Participation Rate | Size of site | Framework Rating | Participation Descriptor |
|---|---|---|---|---|
| >=95 | >=25 | Sufficient N for reporting | As calculated | Either Meets or DNM 95% Total Participation |
| **<95** | >=25 | Sufficient N for reporting | Calculated rating decreased 1 category: Decreased due to participation | Does Not Meet 95% Total Participation |
| >=95 | **<25** | Sufficient N for reporting | ISD: Low Participation | Does Not Meet 95% Total Participation |
| **<95** | **<25** | Sufficient N for reporting | ISD: Low participation | Does Not Meet 95% Total Participation |
| >=95 | All scenarios | Insufficient N for reporting | ISD: Small tested or no students at tested grades | Meets 95% Total Participation |
| <=95 | All scenarios | Insufficient N for reporting | ISD: Small tested or no students at tested grades | Does Not Meet 95% Total Participation |

### Federal Policy Regarding Participation Requirements

As required by the U.S. Department of Education in its interpretation of ESSA, Colorado must take into consideration and have a plan for addressing non-participants in the methodology used for identifying schools for support and improvement under ESSA (see above for calculations associated with participation). In Colorado's two-phase identification methodology, after schools have been identified as Comprehensive (CS), Targeted (TS), or Additional Targeted (ATS) Support and Improvement based on available data, CDE re-runs the analyses to identify CS, TS, or ATS schools due to participation only.

## How do test administration codes impact participation calculations for the state performance frameworks?

### Impact of District Submitted Test Administration Codes on Participation Calculations

The inclusion/exclusion of a student score in both total and accountability participation calculations is dependent on the test administration codes submitted by the district. The table below shows all possible test administration codes and how the student would be included in both total and accountability participation calculations. Note that records coded as "parent excuse" are included in total participation rates as non-participants, but are not included in the accountability participation rate (used when determining if a school's

or district's rating would be lowered). More information can be found in the Calculation Guidebook on the Accountability Resources webpage.

| Test Administration Code | Definition | Total Participation Numerator (NM) | Total Participation Denominator (DM) | Accountability Participation Numerator (NM) | Accountability Participation Denominator (DM) |
|---|---|---|---|---|---|
| No Code: Student Received Valid Test Score and is included in School and District Aggregations | Counts as participant for both participation calculations | Yes | Yes | Yes | Yes |
| First Year in US Multilingual Learner* without a valid score on CMAS English language arts or PSAT/SAT Reading and Writing assessment | Only for ELA accountability participation rate, if student is classified as Non-English Proficient (NEP) and enrolled in Colorado school for less than 12 months, count as participant | No | Yes | Yes* | Yes |
| Took Other Assessment or Duplicate Registration/Attempt | Excluded from both participation calculations | No | No | No | No |
| Withdrew from District During Assessment Window | Excluded from both participation calculations | No | No | No | No |
| Medical Exemption | Excluded from both participation calculations | No | No | No | No |
| Part-Time Public and Part-Time Homeschool Student | Excluded from both participation calculations | No | No | No | No |
| Absent | Counts as non-participant for both participation calculations | No | Yes | No | Yes |
| Test Interrupted and Not Completed | Counts as non-participant for both | No | Yes | No | Yes |

| Test Administration Code | Definition | Total Participation Numerator (NM) | Total Participation Denominator (DM) | Accountability Participation Numerator (NM) | Accountability Participation Denominator (DM) |
|---|---|---|---|---|---|
| | participation calculations | | | | |
| Student Test Refusal | Counts as non-participant for both participation calculations | No | Yes | No | Yes |
| Non-approved Accommodation | Counts as non-participant for both participation calculations | No | Yes | No | Yes |
| Misadministration | Counts as non-participant for both participation calculations | No | Yes | No | Yes |
| Parent Excuse | Counts as non-participant for Total Participation rate and excluded entirely from Accountability participation rate | No | Yes | No | No** |

*First Year in US English Learner: Starting in Spring 2018, students enrolled in a U.S. school for less than 12 months and classified as Non-English Proficient (NEP), based on W-APT/WIDA Screener and a local body of evidence, may be exempt from the first year of the CMAS ELA or PSAT/SAT EBRW assessment. However, NEP students enrolled in grades 3 or 4 whose native language is Spanish and who have received instruction in Spanish in that school year are required to take CSLA. Non-English proficient students not testing their first year in U.S. should have their English language arts records coded with Not Tested Reason = 02. Districts should also complete State Use Field 1 (Date most recently enrolled in U.S. coming from a non-U.S. school/country). Records coded in this way for eligible students will count as a participant for English language arts.

** In the total participation rate calculations, records coded as "parent excuse" will be included in the base count and count as non-participants but are not included in the accountability participation rate (used when determining if a school's or district's rating would be lowered).

## Additional Resources and Assistance

If you have questions about the contents of this fact sheet or need further assistance: Contact **accountability@cde.state.co.us**.