Insufficient State Data

This resource outlines the assignment and implications of receiving an Insufficient State Data (ISD) rating on the performance frameworks. This resource has been created to support schools and districts in understanding the ISD assignments and implications of the assignment. It assumes knowledge about state accountability, performance frameworks, and participation rates. Insufficient State Data (ISD) ratings are assigned when the state does not have enough data to assign a district rating or school plan type. See the table for the types of ratings available to schools and districts. The tables in the appendix summarizes much of the process and conditions for Insufficient State Data ratings.

District Accreditation Ratings	School Plan Types
Accredited with Distinction	
Accredited	Performance Plan
Accredited with Improvement Plan	Improvement Plan
Accredited with Priority Improvement Plan	Priority Improvement Plan
Accredited with Turnaround Plan	Turnaround Plan
Accredited with Insufficient State Data	Insufficient State Data
Accredited with Insufficient State Data: Low Participation	Insufficient State Data: Low Participation

Rating Definitions

Insufficient State Data (ISD) There are multiple ways a school or district might be assigned an ISD rating. There are two preliminary descriptors which respond to small numbers of students:

> *No Students at Tested Grades* - refers to schools that do not have students in grades that are tested through state assessments, such as K-2 schools. This rating takes precedence over the ISD: Low participation descriptor.
>
> *Small Tested Population*-refers to schools and districts that do not enroll enough students, even with the multi-year framework, to calculate all three performance indicators, and ultimately a rating. For schools or districts that meet the criteria for this rating, it will take precedence over the ISD: Low Participation descriptor described below.

The rating that does not include an additional descriptor in which there is not enough reportable data to report an Achievement or Growth indicator rating in one or more levels (elementary, middle, or high) due to the lack of student test participation (i.e. if all kids tested, they would have had reportable data).

Actions associated with an "Insufficient State Data" final rating include annual signing of the district accreditation contract (district level only), additional plan requirements if previously on accountability clock and annual submission of an improvement plan for public posting.

NEW -Low Participation: Insufficient State Data Legislation calls for a designation specific to schools and districts with insufficient state data due to low state assessment participation.

Conditions for Assignment This rating is assigned when total state assessment participation is less than 25% on either ELA or Math.

This is a new formal rating within the accountability system. There are select conditions in which this rating is eligible to change through the request to reconsider process. As with other ratings assigned through the request to reconsider process, there will be a *REVISED descriptor on the rating. There is a provision for this identification that online schools will not be eligible for this identification until 2027. It should be noted this identification is distinct from the Total Participation Rate Descriptor, which describes if the framework meets or does not meet 95% total participation.

Actions Associated with this Rating include annual signing of the district accreditation contract (district level only), additional plan requirements responding to the "low participation" identification and annual submission of an improvement plan for public posting. After three consecutive years of this rating, presentation of the plan to the state board.

Impacts of an ISD Rating on Accountability Processes

Accreditation and Request to Reconsider

Preliminary Rating For districts or schools that did not receive a CDE plan type due to low participation on state assessments, not enough state data, or they are small sites that do not meet the required number of reportable students, the preliminary framework and accreditation form will be pre-populated with "Insufficient State Data: Low Participation", "Insufficient State Data: No Students at Grade Levels Tested for State Assessments", or "Insufficient State Data: Small Tested Population". Districts and schools labeled "Insufficient State Data"will maintain the "Insufficient State Data" rating/plan type and any associated clock status. This rating indicates that the state does not have sufficient information to populate a rating, but the site has enough eligible students to have made a rating possible.

Accreditation/Request to Reconsider

The accreditation process is where the district indicates agreement with the preliminary plan types for the district and its schools -- or to indicate the intent to pursue a change to the state's preliminary plan type assignments (request to reconsider). Sites with "ISD: small tested population" or "ISD: No Students at Grade Levels Tested for State Assessments" preliminary ratings will be able to select their accreditation ratings/plan types through the Accreditation/Request to Reconsider process. Those with Insufficient State Data are not eligible to change their rating.

For Insufficient State Data: Low Participation rating, there is a specific condition under which a school or district could submit a request to reconsider. The rating will align with the participation rate of the official performance framework, the one or three year. If a school or district receives an identification of ISD: Low Participation based on a multi-year framework and the most recent year of data (one year Framework) demonstrates participation exceeding 25% total participation, with current single year participation exceeding 25% could meet conditions for changing the rating to Insufficient State Data. In fall 2026 only, districts that are accredited ISD: Low Participation solely due to online schools which receive an ISD: Low Participation rating will be eligible to request a revised rating. Additional information on the conditions and that process are described in the Accreditation and Request to Reconsider guidance.

Implications for Improvement Planning

Despite not having enough data to assign a performance framework, all sites are still expected to engage in the continuous improvement process. There are some implications for the annual submissions of improvement plans to be aware of. See the section below for suggestions on ways to approach public reporting when working with more limited data.

Planning Requirements for ISD: Low Participation For schools or districts identified with the Insufficient State Data: Low Participation rating, there are planning expectations associated with this rating. These planning

expectations are described in the 2026 quality criteria. The department is aligning the plan expectations within the Unified Improvement Plan template with specific expectations described in the quality criteria. Additional resources will be created to support meeting plan requirements.

Quality Criteria Expectations in response to the ISD: Low Participation rating are articulated in the Quality Criteria. The expectations are aligned with the overall philosophy and approach to improvement planning in Colorado.

Support Districts and schools with an Insufficient State Data: Low Participation rating will have support in understanding the new identification and meeting planning requirements. This includes a webinar, fact sheets and individual consultation.

Annual Submission of Improvement Plans for Sites with ISD Assignments

- ISD sites must submit by the October deadline for public posting unless selecting a rating that needs to be approved by the State Board/participating in Request to Reconsider. Sites with an ISD assignment are not eligible for biennial flexibility for public posting.
- Other types of planning flexibility (e.g., combined plan for small districts) are still available.
- If a site's previous plan type was Priority Improvement or Turnaround (i.e., current framework will list "Hold On Clock"), then the site must still implement additional requirements in UIP.

Considerations for Improvement Planning with Small Numbers

While there may not be enough data for determining a state accountability rating, it's important to maintain momentum on the improvement planning process. For sites with smaller student numbers (e.g., smaller enrollment, low state assessment participation), it is still possible to engage in a robust data analysis to guide improvement planning. Consideration, however, must be given to handling data (low N) for public reporting.

The Unified Improvement Plan is the result of a thorough data analysis using both local and state sources – analyzing data over time to identify persistent patterns both overall and disaggregated by student demographics to arrive at the plan's student performance priorities. For sites with ISD ratings:

- Use State Level Performance Data, if possible. Consider ways the district/school can describe its performance using available state aggregate data, combining groups to increase the reporting group size (e.g., grades 3-5 instead of each grade level), or other data sources to illustrate current performance.
    - Look at any available sections in the current Performance Framework for indications of need. It may be helpful to consult some of the dashboards available on SchoolView.org, such as the District and School Dashboard. Note that the Secure Data Explorer Tool allows you to analyze state data down to an N of 1 to understand performance on state measures. For access, contact your district's Local Account Manager/LAM for the Role: Tableau~AccountabilityContact.
    - Combine results of smaller groups (e.g., *Our school wide MGP for 6-8th grade multilingual learners on ACCESS was 48.0*).
    - In cases where aggregating data is not feasible, an analysis of individual student performance may be conducted internally and used to inform a plan, while the public report should describe patterns observed in the data generally without including specific numbers. Refer to Data Analysis for Small Student Populations, Appendix: Detailed Guidance (page 4) for more examples.

- Use Local Data. Use local assessment data (e.g., iReady, NWEA MAP) and non-assessment data to enhance data analysis and identify areas of strength and opportunities for improvement. This non-assessment data document highlights key considerations for data use and includes data sources that may not have previously been considered for improvement planning, and use cases related to improvement planning.

Considerations for Communicating the ISD Rating to Your Community

Some stakeholders may struggle to understand the reasons for the ISD assignment. This last section is provided as a resource to think about ways to anticipate questions and provide reassurance to your community.

- Insufficient State Data does not imply a value judgment. The ISD assignment means that the state simply did not have enough data to calculate a rating and share a public report.
- The state still publishes the performance framework with any publicly reportable data. While some information may be available for particular indicators (e.g., achievement), it is important not to characterize the performance for the whole school based on representation of limited performance indicators. It may be helpful to look at available data over time compared to historical performance to gain context.
- Leverage available state resources for language in describing accountability information. Engage stakeholders in the improvement planning process and emphasize results based on other local data sources (ex NWEA).

ISD Assignments for Schools/Districts on Performance Watch

Schools and districts assigned an ISD rating that were previously on Performance Watch (i.e., on clock, on watch) hold that status until the site can fully exit by earning a Performance or Improvement rating. The previous year's Performance Watch status will be reported along with "hold" language. The table on the next page highlights a few examples.

The hold on Performance Watch status means that the site remains eligible for additional supports and school improvement grants (e.g., EASI Application); the site is also expected to continue to implement requirements associated with being on Performance Watch. For sites that are "On Watch," UIPs must be submitted for public posting; districts must also sign their accreditation contracts annually. For sites that are "On the Clock," sites have additional requirements around parent notification, additional improvement planning expectations, the local board must adopt the plan, and districts must sign their accreditation contracts annually. See the section on Impacts on Other Accountability Processes for additional detail.

Clock Progression with ISD Ratings

Final 2024 Rating	Final 2025 Rating	Final 2026 Rating
Priority Improvement - Year 3 On Clock	ISD - Year 3 Hold On Clock	Improvement - Year 3 On Watch
Priority Improvement - Year 3 On Clock	ISD - Year 3 Hold On Clock	Priority Improvement - Year 4 On Clock
Improvement - Year 3 On Watch	ISD - Year 3 Hold On Watch	Performance (exit performance watch)
ISD - Year 1 Hold On Clock	ISD - Year 1 Hold On Clock	Improvement (exit performance watch)

SUMMARY TABLE
Insufficient State Data

The following tables describe the various ways a school or district may receive an Insufficient State Data rating. The first table describes scenarios for districts, the second table provides scenarios for schools.

Insufficient State Data - District Accreditation Ratings				
Preliminary Rating	**Conditions**	**Accreditation Options / Request to Reconsider**	**Final Rating**	**Plan Requirements**
Insufficient State Data: Small Tested Population	A district does not have 20 records in each level (Elementary, Middle, High served using either single- or multi-year frameworks. This rating takes precedence over ISD: Low participation	District may select final non-ISD rating for itself.	*District selected rating of* **Accredited with Distinction**, **Accredited**, **Accredited with Improvement**, **Accredited with Priority Improvement**, *or* **Accredited with Turnaround**	Aligned to *District Selected Rating*
		District may leave as ISD for itself.	**Insufficient State Data**	UIP Submission
Insufficient State Data: Low Participation	A district has less than 25% total participation in combined tested grades in either ELA or Math. Does not meet criteria for ISD:Small Tested Population preliminary rating	District may Request to Reconsider only if conditions are met (see: Accreditation and Request to Reconsider Guidance for specific conditions and detailed instructions)	**Insufficient State Data * Revised**	UIP Submission, including additional planning requirements. See Quality Criteria
		District may leave as ISD: Low Participation for school.	**Insufficient State Data: Low Participation**	UIP Submission
Insufficient State Data	A district does not have reportable data for the following indicators for each EMH levels served: ELA Achievement, ELA Growth, Math Achievement, or Math Growth.	No accreditation or Request to Reconsider options are available.	**Insufficient State Data**	UIP Submission

Insufficient State Data - District Accreditation Ratings				
Preliminary Rating	**Conditions**	**Accreditation Options / Request to Reconsider**	**Final Rating**	**Plan Requirements**
CDE assigned rating of **Accredited with Distinction**, **Accredited**, **Accredited with Improvement**, **Accredited with Priority Improvement**, *or* **Accredited with Turnaround**	A district has sufficient data for CDE to calculate a rating. A district has total participation greater than or equal to 25% and less than 85%.	District may Request to Reconsider only if conditions are met (see: Accreditation and Request to Reconsider Guidance for specific conditions and detailed instructions).	**Insufficient State Data*Revised**	UIP Submission
		District may leave as assigned rating for itself.	*CDE assigned rating of* **Accredited with Distinction**, **Accredited**, **Accredited with Improvement**, **Accredited with Priority Improvement**, *or* **Accredited with Turnaround**	Requirements aligned to CDE assigned rating.

Insufficient State Data - School Plan Types				
Preliminary Rating	**Conditions**	**Accreditation Options / Request to Reconsider**	**Final Rating**	**Plan Requirements**
Insufficient State Data: No Students at Tested Grades	A school does not enroll students at grade levels tested for state assessments. (ex k-2 serving school) This rating takes precedence over ISD: Low participation	District may select final non-ISD rating for school.	*District selected rating for school of:* **Performance**, **Improvement**, **Priority Improvement**, *or* **Turnaround**	Aligned to *District Selected Rating*
		District may leave as ISD for school.	**Insufficient State Data**	UIP Submission
Insufficient State Data: Small Tested Population	A school does not have 20 records in each level (Elementary, Middle, High) using multi-year frameworks. This rating takes precedence over ISD: Low participation	District may select final non-ISD rating for school.	*District selected rating for school of:* **Performance**, **Improvement**, **Priority Improvement**, *or* **Turnaround**	Aligned to *District Selected Rating*
		District may leave as ISD for school.	**Insufficient State Data**	UIP Submission
Insufficient State Data: Low Participation	A school has less than 25% total participation in combined tested grades in either ELA or Math. Does not meet criteria for ISD: No Students at Tested Grades or ISD:Small Tested Population	District may Request to Reconsider only if conditions are met (see: Accreditation and Request to Reconsider Guidance for specific conditions and detailed instructions)	**Insufficient State Data * Revised**	New! UIP Submission, including additional planning requirements see Quality Criteria
		District may leave as ISD: Low Participation for school.	**Insufficient State Data: Low Participation**	UIP Submission

Insufficient State Data - School Plan Types				
Preliminary Rating	**Conditions**	**Accreditation Options / Request to Reconsider**	**Final Rating**	**Plan Requirements**
Insufficient State Data	A single-level school (i.e., a school serving only one of elementary, middle, or high school levels) does not have reportable data for one or more of the following indicators: ELA Achievement, ELA Growth, Math Achievement, or Math Growth. A multi-level school (i.e., a school serving combined elementary, middle, and/or high school levels) does not have reportable data for the following indicators for each EMH levels served: ELA Achievement, ELA Growth, Math Achievement, or Math Growth.	No accreditation or Request to Reconsider options are available.	**Insufficient State Data**	UIP Submission
CDE assigned rating of **Performance**, **Improvement**, **Priority Improvement**, *or* **Turnaround**	A school has sufficient data for CDE to calculate a rating. A school has total participation greater than or equal to 25% and less than 85%.	District may Request to Reconsider for an ISD rating only if conditions are met (see: Accreditation and Request to Reconsider Guidance for specific conditions and detailed instructions).	**Insufficient State Data** ***Revised**	UIP Submission
		District may leave as assigned rating for school.	*CDE assigned rating of* **Performance**, **Improvement**, **Priority Improvement**, *or* **Turnaround**	Requirements aligned to CDE assigned rating.