

TS Gold and Preschool

On December 12, 2013 the board passed a motion that stated that Jeffco would not use TS Gold. Jeffco has used TS Gold in preschool based on state statute for three years. All school districts are required to assess preschool students who have Colorado Preschool Program spots. In other words, school districts receive state funds for students who are at-risk. In addition, school districts are required to assess special education students. There are two approved assessments: TS Gold and HighScope COR. The assessments gather the same information, and we must use one of the two identified assessments or risk losing funding in the future. Staff members support continuing to use TS Gold for preschool. We have had no parent concerns and staff members are trained in implementation. Changing assessments will cost Jeffco \$93,516.25 for the following components. More importantly, changing assessments when the information gathered will be the same data will create disruptions of instruction. I plan to put an agenda item on your February 6 agenda to implement TS Gold in preschool. If you vote against that motion, then we will implement HighScope COR.

Subscription costs for 2675 students	\$26,616.25
Professional development from vendor	\$31,900
Cost to the district for training of teachers	\$35,000
Total	\$93,516.25

Printed below are the responses to our questions to CDE. If we do not assess, we will lose funding of approximately \$5.4 million for next year. When I asked Commissioner Hammond about funding, here is his response.

In response to your question, I have to inform you that if there were no approved assessments provided to your preschool students, we would have no choice but to withhold funds in accordance with Statute. It is a requirement of outcome reporting for CPP and special education.

1. If the district discontinues use of TS GOLD, what are the potential effects for our program funding, and compliance with state and federal mandates?

At the preschool level, ongoing assessment of child progress in developmental and academic domains is both a standard of practice for teachers in the early childhood field, and a specific requirement for districts participating in the Colorado Preschool Program and/or serving preschool-age children with disabilities. The preschool assessment systems identified for these purposes in Colorado include the Teaching Strategies GOLD

(TS GOLD) and the HighScope Child Observation Record (HighScope COR). School districts may choose which assessment best meets their needs.

Discontinuing use of TS GOLD would mean the school district would need to use the HighScope COR in order to meet state and federal reporting requirements.

Compliance: Choosing to forego all ongoing assessment using state-approved instruments would place the district status as out of compliance with the following requirements:

- a. Reporting of Colorado Preschool Program progress results for the purpose of preparing annual reports for the Colorado General Assembly. This collection is authorized in statute and State Board of Education rule.

CRS 22-28-112. Reports to legislative committees

By January 15, 2007, and by January 15 of each year thereafter, the department shall report to the education committees of the senate and house of representatives, or any successor committees, on the effectiveness of the Colorado preschool program. The department is authorized to request from any participating school district such information and data as may be necessary to make such reports.

Amended Rules for the Administration of the Colorado Preschool Program Act

2228-R 7.00 Reporting Requirements

7.01 The Colorado General Assembly requires the Colorado Department of

Education to submit annually a report on the status of Colorado Preschool Program. The Colorado Department of Education shall use the information required in the annual reapplication for participation in the Colorado Preschool Program as the basis of that report. In addition, each district council is required to select methods for measuring and reporting child progress. Such methods may include portfolio assessment. Districts are discouraged from using standardized tests as a means of measuring progress. Colorado Department of Education may request a report on child progress from districts as part of the final report.

- b. Reporting of preschool special education child outcome ratings for the purpose of preparing the Annual Performance Report for the United States Department of Education Office of Special Education Programs (OSEP). Specific information regarding preschool special education requirements is provided below in the answer to question 5.

2. Is the district required to participate in the Colorado Preschool Program and how is information required by the state used?

Participation: Participation in the Colorado Preschool Program is voluntary. Currently, 172 school districts and the Charter School Institute participate.

Information Use:

- a. **Classroom Level Use:** Children eligible for the Colorado Preschool Program have significant negative factors present in their lives that place them at extreme risk for academic failure. District preschool teams use assessment results to make informed decisions about how best to support positive outcomes for these children. Teachers share assessment information with families and collect input from families that helps to inform the assessment. Together, teachers and families use this information to develop an Individual Learning Plan, identifying next steps for each child.
 - b. **Program Level Use:** At the program level, administrators use aggregated assessment data to target areas for needed improvement, to make decisions about how to allocate resources such as professional development dollars and to inform the educator effectiveness process. They also use aggregate data to inform the local school board and the community about the growth children are making in the program and how those children fare throughout their education in the district.
 - c. **State Level Use:** The state uses aggregated assessment data to prepare the required annual report to the Colorado General Assembly. This report illustrates the annual growth children make in the Colorado Preschool Program and also illustrates how these children fare as they continue their formal education. These annual reports may be accessed at: <http://www.cde.state.co.us/cpp/legreports.htm>. The state also studies these statewide summaries in order to identify trends and plan the wise use of state resources.
3. **What are compliance and funding consequences of the district discontinuing participation in the Colorado Preschool Program?**

Compliance Consequences: Since the Colorado Preschool Program is voluntary, discontinuation does not result in any compliance consequences.

Effects on Children: Should the district choose to discontinue participation in the Colorado Preschool Program, opportunities for children with significant academic risk factors would be severely curtailed. Currently, Jeffco Schools is using Colorado Preschool Program funds to serve 1,549 eligible children:

- 1,348 half-day preschoolers
- 117 full-day preschoolers
- 84 full-day kindergarteners

Funding Consequences: Jeffco Schools is set to receive \$5,402,371.52 in Colorado Preschool Program funds for preschool services provided in the 2013/2014 school year. This is based on a total allocation of 1,666 half-time FTE at a 2013/2014 per pupil

revenue rate of \$3,242.72. This funding level includes the increase in allocated slots due to the recent expansion of the Colorado Preschool Program. If the district opts out of CPP for future years, they simply would not submit their annual application this spring and no further funding would be available. If the district opts out midyear in the 2013/2014 school year, there would be no adjustment to the figure above because the state funds on a single count date.

4. Is Teaching Strategies GOLD required in the Colorado Preschool Program?

Districts participating in the Colorado Preschool Program must use either the HighScope COR or the Teaching Strategies GOLD assessment system in order to meet the reporting requirements.

5. Is the district required to provide a preschool program for young children with disabilities and is Teaching Strategies GOLD required for preschool special education funded Children? If so, what are compliance and funding consequences of the district discontinuing preschool programming for children with disabilities?

Yes, districts are required to provide a preschool program for young children with disabilities. Under Part B of the Individual Disabilities Education Act (IDEA), states are required to provide a Free and Appropriate Public Education (FAPE) within the Least Restrictive Environment (LRE) to students with disabilities ages 3-21.

Not only are districts required to provide special education to preschool-aged children, but under state legislation, administrative units (AUs) are also required to conduct evaluations of children who have not reached preschool-age and are suspected of having a developmental delay or disability. These evaluations determine eligibility for Part C under IDEA early intervention services. Many of the children who receive early intervention services transition into special education services as they enter preschool. In addition to serving students with disabilities, per IDEA rules & regulations 300.601 (b)(1); "Each state must collect valid and reliable information as needed to report annually to the Secretary on the indicators established by the Secretary for the State performance plans."

Each year a State Performance Plan (SPP) is submitted to the federal Office of Special Education Programs (OSEP) that addresses the indicators established by the Secretary. Indicator #7 is "Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved: positive social-emotional skills; acquisition and use of knowledge and skills; and use of appropriate behaviors to meet their needs." Administrative Units (AUs) must use a CDE-approved assessment system to collect data for this federally required indicator. Both Results Matter assessments, TS GOLD and HighScope COR, have been approved by CDE for this data collection.

Districts can opt out of the Colorado Preschool Program, but districts would still need to comply with all obligations of federal regulations pursuant to IDEA and all state rules pursuant to the Exceptional Children's Educational Act

(ECEA). Non-compliance could result in loss of IDEA funding and could place the district at risk of losing all federal funding . The district would also be at risk for legal action from parents. District legal counsel should be sought if districts consider discontinuing preschool programming for children with disabilities.

The department would like to emphasize that IDEA has strict requirements with regard to confidentiality of records under both section B and C of the Act that to which AUs must adhere.