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# **Analysis of Colorado Multilingual Learner Redesignation Among the 2018 3rd Grade Cohort**

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A report prepared by the Center for Assessment, Design, Research and Evaluation (CADRE) at the CU Boulder School of Education.



School of Education  
UNIVERSITY OF COLORADO **BOULDER**

# Acknowledgements

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## About CADRE

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The Center for Assessment, Design, Research and Evaluation (CADRE) is housed in the School of Education at the University of Colorado Boulder. The mission of CADRE is to produce generalizable knowledge that improves the ability to assess student learning and to evaluate programs and methods that may have an effect on this learning. Projects undertaken by CADRE staff represent a collaboration with the ongoing activities in the School of Education, the University, and the broader national and international community of scholars and stakeholders involved in educational assessment and evaluation.

## Suggested Citation

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# Executive Summary

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This study analyzes the redesignation patterns of a cohort of Multilingual Learner (ML) students in Colorado from 3rd to 8th grade (from 2018 to 2023), focusing on how redesignation varies across demographic groups. Redesignation as fluent English proficient (FEP) is a two-step process in Colorado: students must first earn a minimum score on the ACCESS exam and then produce a standardized body of evidence (BOE) demonstrating readiness to transition to mainstream English classrooms, with BOE criteria defined locally by districts and schools. By 8th grade, 69% of the 8,064 students in the cohort were redesignated as FEP, with the majority achieving this status by 7th grade. There was a significant drop in ACCESS test scores for 6th graders during the 2020-21 school year, reflecting both historical trends and pandemic-related disruptions. A large proportion of students achieving the minimum ACCESS score for redesignation each year were not redesignated, indicating the BOE requirement plays an important role in redesignation decisions. Students identified as Asian and students not eligible for Free or Reduced-Price Lunch (FRL) were more successful in meeting ACCESS criteria and achieving redesignation compared to Hispanic and FRL-eligible students. Overall female students were more likely to be redesignated as FEP by 8th grade. However, among students achieving the minimum ACCESS score necessary for redesignation each year, male students were consistently more likely than female students to be redesignated. Students with Individualized Education Programs (IEPs) had lower ACCESS scores and redesignation rates compared to those without IEPs. The findings underscore the need for ongoing monitoring of redesignation practices to address potential disparities and ensure equitable educational opportunities for ML students in Colorado.

# Introduction

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The educational goal of programs supporting English language learners is to ready them to enter mainstream instruction that will offer minimal English language support. Redesignation refers to the process by which Multilingual Learners (MLs)<sup>1</sup> are judged to be adequately prepared to receive mainstream instruction with minimal English language support. Federal legislation compels states to establish “standardized statewide entrance and exit procedures” (ESSA, 20 U.S.C. § 3111, 2015) for English language instructional programs to ensure that students receive the services necessary to develop English fluency and exit ML status in a timely manner. Non-regulatory guidance provided to states by the federal government clarifies that “the requirement that the procedures be ‘statewide’ means they must be consistently applied” (United States Department of Education, n.d.). Despite clear directives, optimizing the redesignation process is a difficult task. Variation in redesignation timelines still occurs when statewide exit procedures are in place (Mavrogordato & White, 2017), and redesignation can vary in ways that suggest systematic disadvantages for certain groups of students (Grissom, 2004; Estrada & Wang, 2018; Umansky et al., 2020). Moreover, high redesignation rates do not guarantee that an English language development program has been effective (Gandara & Merino, 1993; Robinson, 2011). Given such challenges, states’ implementation of redesignation policy is a matter worthy of investigation.

The redesignation process in Colorado has two steps. To be eligible for redesignation, students must earn a score of at least 4.0 overall and in literacy on the WIDA ACCESS for ELLs 2.0 English-language proficiency exam (ACCESS). If the student meets the ACCESS benchmarks, then redesignation decision makers evaluate a district-specified standardized “body of evidence” (BOE) (e.g., interim tests or samples of a student’s course work) to inform a final decision about redesignation. In the 2016-17 school year, the standards and cut points shifted on ACCESS, and these shifts increased the benchmark scores required to be eligible for redesignation. These higher thresholds led to changes in the redesignation requirements for students in the 2017-18 and subsequent school years. To better understand the learning experiences and outcomes for ML students following the changes to the ACCESS exam, we use statewide longitudinal data from Colorado to examine redesignation outcomes for a single cohort of ML students from 2017-18 to 2022-23. We intend to answer the following questions:

- What redesignation patterns appear after the introduction of the new redesignation process?
- Are there systematic differences in redesignation outcomes across demographic subgroups of ML students?

We begin with a summary of redesignation policy in Colorado. We then describe the data and present results. We end by contextualizing the results and suggesting avenues for future research.

<sup>1</sup>Although federal legislation and guidelines use the phrase “English learner” (EL), in this report we follow CDE recommendations to use the phrase Multilingual Learner to emphasize the value of developing proficiency in multiple languages and to recognize the value of students’ first languages and cultures ([https://www.cde.state.co.us/cde\\_english/mldearcolleagueaugust2022](https://www.cde.state.co.us/cde_english/mldearcolleagueaugust2022)).

# Background

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This section describes the processes for identifying, redesignating, and monitoring ML students in Colorado. While this analysis is specifically concerned with the Colorado context, certain aspects of the redesignation policy described here are similar to policy choices in other states. For example, redesignation procedures used in Colorado include both test-based and non-test-based criteria, which is true in other states such as California, Georgia, New Jersey, and Pennsylvania (Morales & Lepper, 2024).

## Identification

Colorado defines an ML as “a student who is linguistically diverse and who is identified ... as having a level of English language proficiency that requires English language development instruction to achieve standards in grade-level content in English” (Colorado Department of Education, n.d.). Colorado requires that schools initiate identification procedures within the first 30 days of school or within two weeks of a student’s enrollment if a student enrolls after the first 30 days of school. Identification is a two-step process. The first step is to administer a Home Language Survey to establish whether a student’s primary or home language is not English. If a student’s primary or home language is not English, then the school assesses the student’s English proficiency with the WIDA Consortium’s screener assessment. Colorado considers students who score below 2.5 Non-English Proficient (NEP) and students who score below 4.0 Limited English Proficient (LEP). Colorado flags all students who score below 4.0 to enter a Language Instruction Educational Program (LIEP), and schools must notify parents about recommended LIEP decisions. Although parents may decline services for their children, schools are still required to provide adequate language support and instruction until a student is formally redesignated as a Fluent English Proficient student (FEP).

## Redesignation Process

Redesignation from NEP or LEP to FEP is also a two-step process in Colorado. The first step is the administration of the annual ACCESS assessment. Students complete ACCESS on paper (grades K-12) or on a computer (grades 1-12). The exam assesses students’ English proficiency across four domains: reading, speaking, listening, and writing. Students receive scores on a 6-point scale summarizing their performance on each domain and four weighted composites: oral language, literacy, comprehension, and overall. Students who achieve an overall score of 4.0 or higher and a literacy score of 4.0 or higher are eligible for redesignation. The second step is the collection of a standardized BOE demonstrating student proficiency in reading and writing comparable to English proficient students. According to the state, acceptable evidence for the BOE includes, but is not limited to, observations, student journals, student performance portfolios, READ Act assessments, and state standardized tests such as the Colorado Measures of Academic Success (CMAS). Districts and schools determine the standardized BOE requirements locally.

For example, one metro school district shared illustrative documentation used to inform redesignation decisions with our team. One redesignation form (Appendix A) shows that the district rates students’ grade-level reading and writing skills on a 1-3 scale. An independent extended writing sample determines grade-level writing, while one of several sources can

determine grade-level reading. A separate document provided by the district lists acceptable sources of evidence to document reading ability that includes Star Early Literacy, Star Reading, CMAS ELA, PSAT 9 EBRW, PSAT 10 EBRW, SAT EBRW (National), and SAT EBRW (State). The BOE requirement in this district thus employs a combination of test-based measures of proficiency along with additional appraisals of student writing ability. Without requesting similar information from each school district in the state, there is no way to know precisely how the BOE requirement operates in each district.

The BOE requirement thus presents challenges for this analysis and the study of redesignation policy implementation in general. Districts choose how to implement the BOE requirement, which means that paths to satisfying the requirement can vary from one district to another. Also, federal law does not compel districts or schools to make their BOE decisions public. Consequently, although each school or district must have a clearly delineated process, the BOE requirement is something of a black box to us. We know that the BOE influences redesignation decisions, but we do not know exactly what evidence is included in each school or how it contributes to the decision to keep a student in language services or end their English language support.

## **Monitoring**

In the first two years after redesignation, Colorado classifies redesignated students as FEP Monitor Year 1 (FEP M1) and FEP Monitor Year 2 (FEP M2), respectively. These students no longer take annual English language proficiency exams, but ESSA requires that districts and schools monitor these students' academic progress for two years. Colorado reclassifies as "Former English Language Learners" (FELL) students who make successful academic progress for two monitoring years. The purpose of monitoring redesignated students is to ensure that they are succeeding in mainstream classroom instruction and performing academically at grade level at least as well as FELL and other English proficient peers. If a student struggles after redesignation, districts and schools must reinstate academic and English language support. Colorado encourages districts and schools to establish monitoring processes that include observation and assessment guidelines, meetings between language instruction professionals and content teachers, and communication with the student's family. Schools determine at the end of the year whether to progress a student to the second year of monitoring, exit a student from FEP status (after two successful years of monitoring), or place a student back into an LIEP.

# Data

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We use statewide longitudinal data provided to CADRE researchers by the Colorado Department of Education (CDE). We focus on the cohort of ML students who were in 3rd grade in 2017-18 and follow them through 8th grade in 2022-23. We use data beginning in 2017-18 because our focus is on studying redesignation outcomes under the new procedures, which were first implemented in 2017-18. We analyze data through 2022-23 because this is the most recent year for which complete data were available. We begin with students in 3rd grade because the administrative data files we use have the most detailed demographic and enrollment information for students beginning in grade 3. Although it would be ideal to study student outcomes beginning when students first enter school, beginning the analysis with 3rd grade for this period captures the pivotal transition from elementary to middle school. There are benefits to studying ML students in other grades or cohorts; we will undertake this in the future.

We use these administrative data to construct demographic variables indicating each student's gender, free or reduced price lunch (FRL) eligibility<sup>2</sup>, Individualized Education Program (IEP) status, language proficiency status, and race/ethnicity<sup>3</sup>. With regard to language proficiency status, possible classifications are FELL, FEP Exited Year 1, FEP Exited Year 2, FEP Monitor Year 1, FEP Monitor Year 2, LEP, NEP, Not Applicable<sup>4</sup>, and PHLOTE - Primary or Home Language Other Than English. We refer to students in the NEP and LEP classifications as current ML students because they receive English language development services.

To determine eligibility for redesignation, we use administrative data inclusive of WIDA ACCESS scores to identify which students take the exam in a given year and achieve the required language proficiency score. For example, an ML student in 2018-19 is eligible for redesignation if they completed ACCESS testing in the prior year (2017-18) and their score exceeded the thresholds described above. We consider a student to be redesignated in the first year that they change designation from NEP or LEP to FEP Monitor 1, FEP Monitor 2, FELL, FEP Exit 1 or FEP Exit 2. To reiterate, ML students must meet two criteria to achieve redesignation: 1) A minimum score of 4.0 (Overall and Literacy) on the ACCESS exam and 2) Generate a body of evidence demonstrating proficiency in reading and writing comparable to English proficient students. A student can be eligible for redesignation in a particular year without achieving redesignation.

The data files include records for 11,352 3rd grade NEP or LEP students (i.e., current ML students) in 2017-18. We limit the analytic sample to a stable cohort of students with non-missing ACCESS scores who progress one grade each year from 2017-18 through 2022-23. This allows us to describe outcomes for a stable sample of students across the relevant time frame and excludes students who: a) repeat or skip a grade during this time, b) leave or enter Colorado public schools between 2018-19 and 2022-23, or c) were not receiving English language programming services in 2017-18. The final analytic sample includes 8,064 students.

<sup>2</sup>In this document, the FRL classification refers to students who were eligible for free or reduced price lunch at least once between 2017-18 and 2022-23.

<sup>3</sup>Race/ethnicity includes seven race/ethnicity categories: American Indian or Alaska Native, Asian, Black, Hawaiian/Pacific Islander, Hispanic, Two or More Races, and White. The administrative data provides two gender categories: female and male.

<sup>4</sup>"Not Applicable" includes students whose primary or home language is English.

Before turning to our primary analyses, we provide data about the statewide population of ML students and redesignation rates to situate our subsequent analyses. Table 1 shows the total Colorado K-12 student population and the current ML student population from 2017-18 to 2022-23. We derive ML student counts from the statewide data files provided to CADRE by CDE. Total Colorado K-12 student counts are publicly available on the CDE website. Between 2017-18 and 2022-23 the K-12 student population decreased from 877,232 to 851,059, or about 3%, while the ML student population decreased about 14%, from 103,093 to 88,939. In 2017-18 approximately 11.75% of K-12 students were current ML students while in 2022-23 approximately 10.45% were ML.

**Table 1. Colorado K-12 student population and ML population, by year**

| Year    | CO Students | NEP/LEP Students |
|---------|-------------|------------------|
| 2017-18 | 877,232     | 103,093          |
| 2018-19 | 877,808     | 97,793           |
| 2019-20 | 878,798     | 94,134           |
| 2020-21 | 856,783     | 87,843           |
| 2021-22 | 855,623     | 89,457           |
| 2022-23 | 851,059     | 88,939           |

Table 2 shows the percentage of ML students taking ACCESS in each grade and year who earned sufficient scores to be eligible for redesignation the following year<sup>5</sup>. The values in each cell indicate the percentage of NEP and LEP students in a given grade and year who earned the requisite ACCESS scores. For example, 6.9% of NEP/LEP 1st grade test takers achieved an overall score and a literacy score of 4.0 or higher in 2016-17, and thus would have been eligible for redesignation as FEP Monitor Year 1 the following year in 2nd grade. The rate at which test takers become test-score eligible tends to increase from 1st grade to 5th grade, before falling sharply in 6th grade, a pattern that is consistent across all years. The percentage of students earning the requisite scores fell in 2020-21 across all grades. Students typically complete ACCESS early in the calendar year, so the scores presented for 2020-21 come from the first test administration after the interruptions to schooling brought about by the COVID-19 pandemic. In the years following 2020-21, test-score eligibility remained lower than average pre-pandemic levels for all grades.

<sup>5</sup>The figures reported in Tables 2 and 3 are based on a slightly different sample than the analytic sample for our primary analyses. Details about the sample used for Tables 2 and 3 are provided in Appendix B.



**Table 2. Percentage of ML students test-score eligible for redesignation by grade and year**

| Grade | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | 2021-22 | 2022-23 |
|-------|---------|---------|---------|---------|---------|---------|---------|
| 1     | 6.9     | 8.2     | 6.7     | 5.6     | 4.2     | 3.9     | 3.6     |
| 2     | 15.5    | 18.2    | 17.9    | 17.2    | 12.3    | 11.4    | 10.3    |
| 3     | 26.7    | 30.8    | 30.3    | 28.5    | 18.0    | 18.5    | 17.8    |
| 4     | 35.5    | 44.0    | 43.7    | 44.3    | 34.0    | 36.9    | 30.0    |
| 5     | 43.4    | 49.6    | 50.1    | 49.9    | 37.7    | 42.8    | 35.0    |
| 6     | 17.0    | 21.2    | 22.4    | 16.3    | 8.9     | 9.6     | 7.0     |
| 7     | 22.2    | 22.1    | 23.5    | 16.9    | 9.3     | 10.7    | 8.8     |
| 8     | 27.8    | 26.4    | 25.8    | 21.0    | 13.0    | 14.0    | 10.7    |
| 9     | 36.4    | 35.0    | 31.9    | 23.5    | 21.3    | 16.6    | 16.8    |
| 10    | 25.5    | 34.8    | 30.4    | 21.7    | 15.4    | 15.9    | 13.6    |
| 11    | 20.8    | 28.1    | 27.5    | 19.8    | 12.4    | 12.3    | 13.4    |

Table 3 shows redesignation rates by grade and year across grades 1-11. Each cell presents the percentage of NEP/LEP test takers who took ACCESS in a given year and were no longer NEP/LEP in the following year. For example, 3.7% of NEP/LEP 1st grade test takers in 2016-17 were no longer NEP/LEP when they enrolled in 2nd grade the following year (2017-18). Redesignation rates increase steadily from 1st grade to 5th grade. Rates decrease sharply for 6th graders going into 7th grade relative to rates among 5th graders going into 6th grade across all years. Among high school students, redesignation rates tend to be highest for 9th graders transitioning to 10th grade. Overall, redesignation rates tend to be highest among 5th graders going into 6th grade. Rates were lowest among 1st graders transitioning to 2nd grade. Average redesignation rates after 2020 were similar to pre-pandemic averages in grades 1 to 5, but were consistently lower in grades 6 to 11.

**Table 3. Percentage of ML students redesignated in following year, by grade and year**

| Grade | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | 2021-22 | 2022-23 |
|-------|---------|---------|---------|---------|---------|---------|---------|
| 1     | 3.7     | 5.3     | 4.8     | 4.0     | 4.3     | 4.6     | 4.1     |
| 2     | 6.9     | 9.4     | 9.8     | 9.4     | 9.5     | 9.4     | 8.3     |
| 3     | 16.5    | 19.0    | 19.4    | 15.8    | 12.1    | 16.5    | 15.6    |
| 4     | 19.4    | 24.3    | 24.2    | 23.5    | 18.1    | 27.9    | 22.1    |
| 5     | 24.4    | 25.9    | 29.0    | 27.9    | 22.0    | 32.6    | 24.8    |
| 6     | 12.5    | 13.5    | 15.7    | 11.9    | 10.0    | 11.9    | 8.6     |
| 7     | 15.1    | 16.7    | 18.0    | 13.1    | 8.4     | 12.8    | 9.1     |
| 8     | 18.7    | 19.4    | 19.7    | 15.6    | 12.1    | 15.6    | 11.6    |
| 9     | 22.2    | 21.8    | 23.9    | 18.5    | 17.4    | 16.7    | 14.6    |
| 10    | 14.6    | 22.9    | 20.7    | 16.0    | 13.8    | 15.9    | 12.5    |
| 11    | 12.5    | 17.9    | 20.3    | 15.8    | 11.7    | 13.9    | 11.5    |

Table 4 summarizes the demographic characteristics of the analytic sample used in our primary analyses and all current ML 3rd graders in 2017-18. The students included in the analytic sample of 3rd graders are similar to the population of all current ML 3rd graders in 2017-18. The analytic sample was 48% female, and the largest racial/ethnic groups were Hispanic (84%) and Asian (6%). Most of the students qualified for FRL (91%) and 12% had an IEP.

**Table 4. Demographics of analytic sample and full grade 3 ML cohort in 2017-2018**

|                 | <b>N</b> | <b>Female</b> | <b>FRL</b> | <b>IEP</b> | <b>Hispanic</b> | <b>Asian</b> |
|-----------------|----------|---------------|------------|------------|-----------------|--------------|
| Analytic Sample | 8,064    | 48%           | 91%        | 12%        | 84%             | 6%           |
| Full Grade 3 ML | 11,352   | 48%           | 90%        | 14%        | 82%             | 7%           |

## Results

Table 5 summarizes redesignation patterns for students in the analytic sample. By 8th grade 5,565 (69%) of the 8,064 ML students were redesignated as FEP. Most of the students who achieved redesignation did so by 7th grade. The percent of students achieving the minimum ACCESS score needed to be eligible for redesignation ranged from 8% to 55%. Among those students eligible for redesignation, between 54-76% were redesignated each year. Redesignation rates ranged from 11% (students entering 7th grade) to 37% (students entering 6th grade). The percentage of students earning the requisite ACCESS scores dropped sharply in 6th grade (test taken early in 2021, during the 2020-21 school year). Based on the historical data provided above, 6th grade students have historically earned the eligibility scores on ACCESS at lower rates than 5th grade students, but this was also the first year students took the ACCESS tests after experiencing COVID-19 related disruptions. Hence, this drop in 6th grade ACCESS performance likely reflects both longstanding patterns across grades and additional impacts of the pandemic.

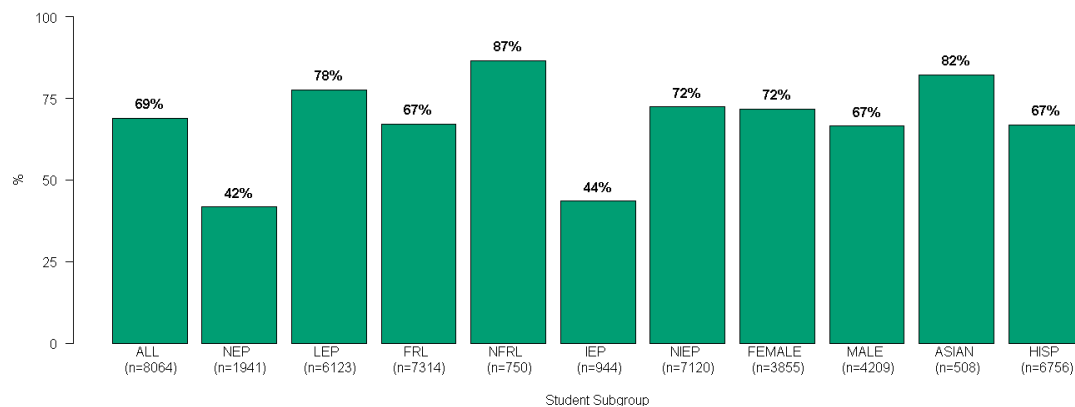
By 8th grade, 2,499 (31%) of the students in the cohort were still NEP or LEP. Compared to the entire cohort, these students were more likely to be male, Hispanic, FRL eligible, have an IEP, and to have been NEP (rather than LEP) in 3rd grade. At each grade, a small number of students achieved redesignation despite not earning the minimum ACCESS score needed to be eligible for redesignation. This accounts for the fact that more students in 7th and 8th grade achieved redesignation than achieved the minimum ACCESS score. A small number of students eventually re-enter ML status. From 2017-18 to 2022-23, 394 students re-entered ML status, with the largest number of students re-entering in 7th grade and 8th grade. Approximately 70% of these students re-entered ML status when enrolling in a new school.

**Table 5. Redesignation and re-entry for grade 3 ML cohort**

| Grade | ML Students | Eligible   | Redesignated | Re-entered | Redesignated & Not Eligible |
|-------|-------------|------------|--------------|------------|-----------------------------|
| 3     | 8064        | 2745 (34%) | --           | --         | --                          |
| 4     | 6282        | 3003 (48%) | 1782 (22%)   | 0          | 122                         |
| 5     | 4485        | 2449 (55%) | 1835 (29%)   | 38         | 136                         |
| 6     | 2886        | 237 (8%)   | 1680 (37%)   | 81         | 180                         |
| 7     | 2725        | 284 (10%)  | 315 (11%)    | 154        | 187                         |
| 8     | 2499        | --         | 349 (13%)    | 123        | 131                         |

Figure 1 shows the percentage of students in each subgroup achieving redesignation by 8th grade. Students with the LEP classification in 3rd grade were much more likely to achieve redesignation by 8th grade than those who were NEP (78% vs. 42%). More than half of students who had an IEP in 3rd grade retained NEP or LEP status in 8th grade. Nearly three-quarters (72%) of female students achieved redesignation, compared to two-thirds of males (67%). Less than 20% of Asian students remained in ML status as of 8th grade, while 33% of Hispanic students were still NEP or LEP in 8th grade.

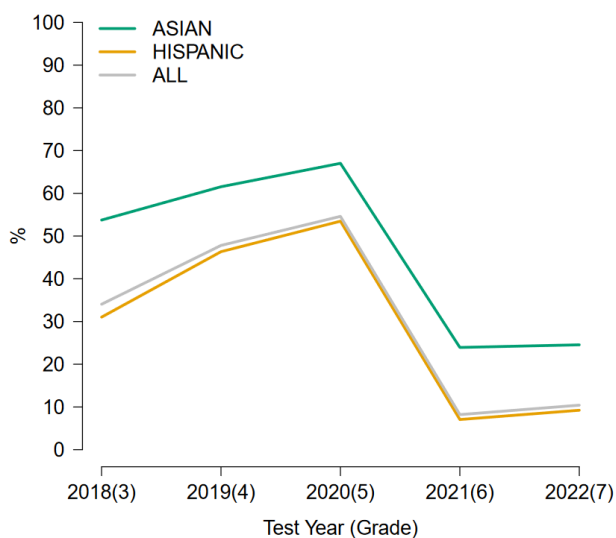
**Figure 1: Percentage of students redesignated by 8th grade**



To better understand variation in redesignation rates across demographic groups, we created a series of figures showing the percent of students eligible for redesignation each year based on ACCESS scores and the percentage of these eligible students who achieved redesignation in the following year. Comparing these two different rates across groups helps understand

whether differences in redesignation outcomes are due to differences in ACCESS scores versus other factors, such as the standardized body of evidence that is required in addition to ACCESS scores. The following figures compare these rates for Asian and Hispanic students (who comprise approximately 90% of the cohort), male and female students, students with and without an IEP, and for students who were or were not ever FRL eligible.

**Figure 2. Asian and Hispanic students meeting ACCESS requirement**



**Figure 3. Eligible Asian and Hispanic students redesignated**

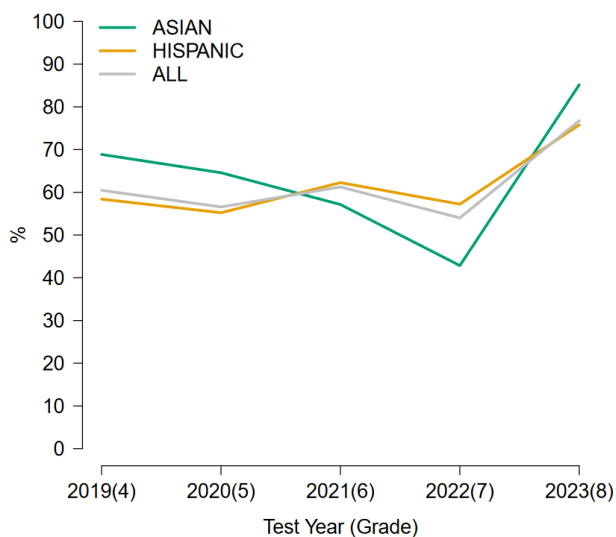
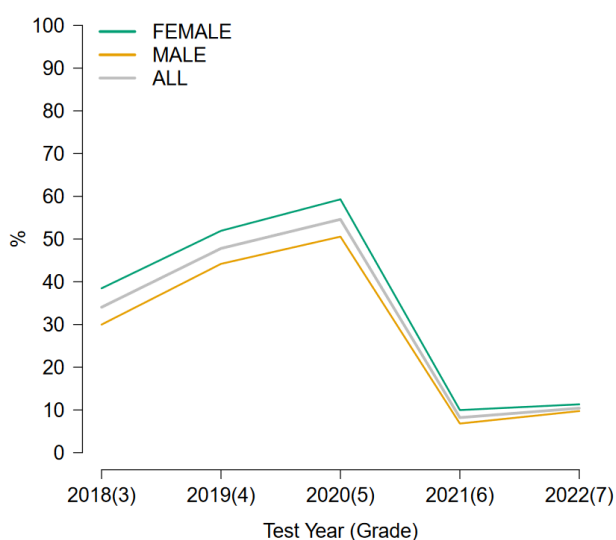


Figure 2 shows the percentage of students achieving the requisite score on ACCESS to be eligible for redesignation each year separately for Asian and Hispanic students. The green line represents Hispanic students, the yellow line represents Asian students, and the grey line represents the full cohort (corresponding to values in Table 4). Between these two groups, Asian students were more likely to achieve the requisite score on ACCESS to be eligible for

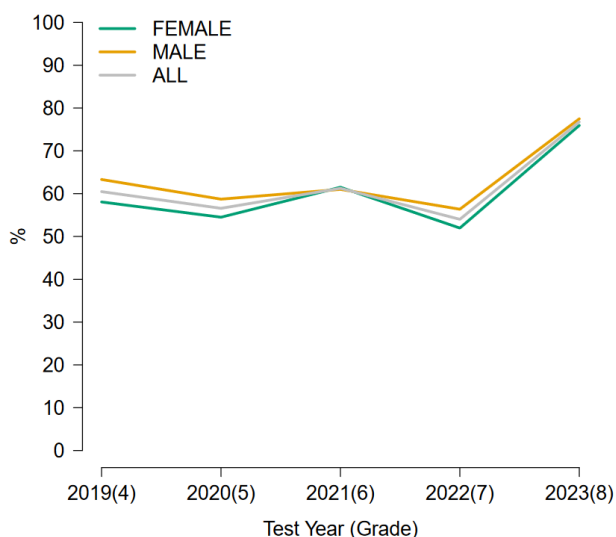
redesignation each year and there was a large drop in ACCESS pass rates for both groups in 2020-21 (6th grade ACCESS test). Figure 3 shows the percentage of Asian and Hispanic students who achieved redesignation in the year after earning the requisite ACCESS scores. Among eligible students, Asian students were more likely to be redesignated in 4th, 5th, and 8th grade, while Hispanic students were more likely to be redesignated in 6th and 7th grade. There were, however, a relatively small number of Asian students in each year so grade to grade differences should be interpreted cautiously.

Figures 4 and 5 show ACCESS and redesignation outcomes by student gender. The female students in the cohort were more likely to meet the ACCESS redesignation criteria than males in each grade, with differences ranging from approximately 2 to 9 percentage points. The difference in passing rates was largest in 5th grade and smaller in 6th and 7th grades. Although female students were more likely to earn the required scores on ACCESS, among test-score eligible students female students were less likely to be redesignated than male students in 4th, 5th grade, and smaller in 6th and 7th grades.

**Figure 4. Female and male students meeting ACCESS requirement**

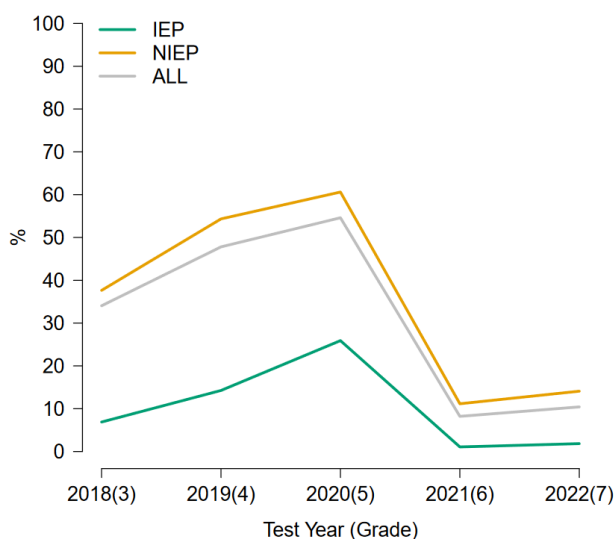


**Figure 5. Eligible female and male students redesignated**

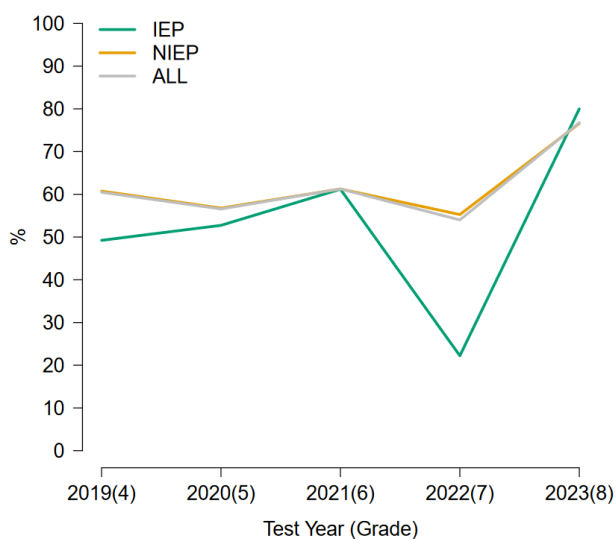


Figures 6 and 7 show ACCESS and redesignation outcomes by IEP status. Students without an IEP were more likely to meet the ACCESS requirement than students with an IEP at every grade level, with differences ranging from 10 to 40 percentage points. Students with an IEP were the least likely to achieve the minimum required ACCESS score of any group in this analysis, with eligibility rates ranging from 1% to 25% across grades.<sup>6</sup> Among students earning a passing score on ACCESS, students without an IEP were more likely to achieve redesignation than those with an IEP at every grade level except 5th and 6th grade. However, due to the small sample sizes being compared in these figures, grade to grade differences should be interpreted cautiously.

**Figure 6. IEP and NIEP students meeting ACCESS requirement**

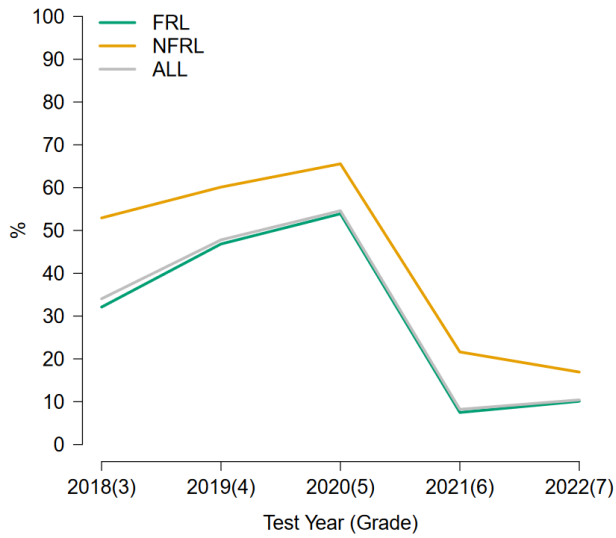


**Figure 7. Eligible IEP and NIEP students redesignated**

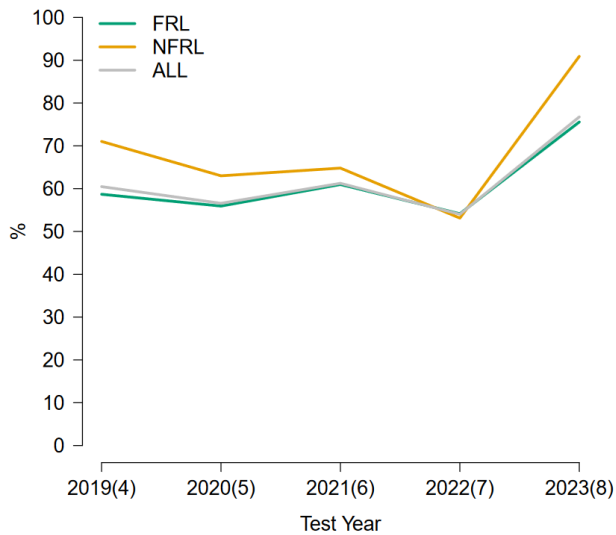


<sup>6</sup>Results here are only for students completing the regular ACCESS exam. These analyses did not include students with the most significant cognitive disabilities who completed the Alternate ACCESS exam.

**Figure 8. FRL and Non-FRL students meeting ACCESS requirement**



**Figure 9. Eligible FRL and Non-FRL students redesignated**



Finally, figures 8 and 9 show ACCESS and redesignation outcomes by FRL status. Non-FRL eligible students met the ACCESS redesignation criteria more often than FRL eligible students in each grade and were more likely to achieve redesignation when they achieved the minimum required score. However, due to the small number of non-FRL students being compared in these figures, grade to grade differences should be interpreted cautiously.

# Discussion

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Redesignation is an important achievement for MLs. To better understand redesignation policy implementation in Colorado, we selected a single cohort of 3rd grade MLs and examined their redesignation outcomes. By 8th grade, about 70% of the cohort were classified as FEP. However, the percentage of redesignated students varied across subgroups. A larger proportion of Asian students achieved redesignation by 8th grade than Hispanic students, and female students were more likely to have done so than male students. Students who were ever FRL eligible were less likely than non-FRL eligible students to reach FEP status. Students with the lowest language proficiency level (NEP) in 3rd grade were also less likely to be FEP in 8th grade than students classified as LEP in 3rd grade.

We examined ACCESS results to understand their role in the cohort's redesignation outcomes and observed some notable patterns. First, there was a sharp decline in the proportion of test takers earning the minimum scores required for redesignation eligibility based on 6th grade ACCESS scores. Students in this cohort took the 6th grade ACCESS exam early in 2021 after nearly a year of COVID-19 related disruptions and the lower 6th grade scores likely reflect the impacts of these disruptions. This phenomenon may not be unique to this cohort, however, as historically a smaller percentage of 6th grade students achieve the minimum ACCESS score necessary for redesignation relative to students in earlier grades. Our analysis could not determine the extent to which the lower 6th grade scores were due to historical trends, pandemic-specific effects on language development, or other factors such as changes to the population of tested students. The decline in ACCESS scores from 5th to 6th grade as well as the declines from pre to post-2020 across all grades are consistent with declines in ACCESS scores observed among the national population of students taking ACCESS during and since the COVID-19 pandemic (Poole & Sahakyan, 2024).

Regarding student subgroups, performance gaps persisted across grades. Asian students, female students, students without an IEP, and students who were never FRL eligible earned the requisite ACCESS scores more often than Hispanic students, male students, students with an IEP, and ever FRL eligible students in each grade. Yet many students who achieved the minimum ACCESS score needed for redesignation did not get redesignated as FEP the following year. Among the 2,499 students who did not achieve redesignation by 8th grade, 1,051 (42%) earned the minimum ACCESS score required for redesignation at least once between 3rd and 8th grade. There were also differences in redesignation rates among students achieving the minimum ACCESS score. Female students were more likely to achieve the minimum ACCESS score necessary for redesignation at every grade level, for example, but male students earning the minimum ACCESS score were more likely to be redesignated than female students earning the minimum ACCESS score. Although the differences in male and female redesignation rates among eligible students were small, they were systematic.

Looking at ACCESS scores alone provides an incomplete picture of the redesignation process. This is because Colorado requires a standardized BOE to show student preparedness to transition to mainstream classrooms with minimal language support in addition to achieving the minimum ACCESS score. The large proportion of students who met ACCESS eligibility requirements each year but did not get redesignated suggests that the



BOE requirement plays an important role in the redesignation process. Although districts and schools must have standardized requirements in place for the BOE, the specific requirements can vary across districts and schools. For example, one district might rely solely on CMAS results to establish grade-level proficiency, while another district might utilize CMAS results in tandem with student performance portfolios or teacher observations (as is the case for the example district discussed earlier). The BOE requirements are not arbitrary, but the variation creates the possibility that similar students enrolled in different schools will experience different redesignation outcomes, which suggests that some students might receive language support services for either more or less time than they need (Mavrogordato & White, 2017).

To the extent that BOE requirements depend on teachers' judgments of ML students' academic performance, this poses further challenges. First, it may be difficult to fully standardize teachers' judgments both within and between schools. In their analysis of national-level data, for example, Martinez et al. (2009) found that teachers use different standards for assessing different groups of students based on their perceptions of students' abilities. Second, there is the possibility that teachers' judgments could differ systematically for students from different backgrounds. Prior research has shown that teacher judgments about students from historically marginalized groups can be systematically lower (Meissel et al., 2017) and that factors such as race, socioeconomic status, and gender can influence teacher judgments (Auwarter & Aruguete, 2008; Tenenbaum et al., 2007).

That standardized BOE results do not align perfectly with the results of standardized tests does not necessarily mean these requirements are biased or that students who ought to be redesignated will be unfairly enrolled in or placed out of language support services. The additional BOE requirements provide local context about student performance that may result in better instructional decisions for individual students than relying on a single standardized test score. Although the goal is for all students to develop fluency in the English language, being redesignated as FEP too soon may ultimately hinder a student's overall academic progress. However, because the ACCESS and BOE requirements are conjunctive, meaning that students must meet both requirements, it is important to monitor each requirement for potential differential impacts across student subgroups.

There are important limitations and future directions to note. First, we examined results for a single cohort. Moreover, because we relied on ACCESS scores (to determine eligibility), the analysis only included students with non-missing ACCESS scores and does not represent outcomes for students who did not participate in ACCESS testing, which occurred more frequently in 2021 than in prior years. Second, we were not able to determine whether observed trends were due to pandemic-specific effects. Finally, we did not examine academic outcomes for these students that may have been impacted by redesignation decisions. Readers should consider these limitations when interpreting the results or comparing them to other contexts.

The differences in outcomes across student subgroups suggest important educational inequalities to study further, but there are two different potential explanations with different implications for addressing these disparities. If the redesignation decisions for this cohort were correct in the sense that students are redesignated as FEP when they were ready to enter mainstream classrooms, this suggests students from certain groups are developing English proficiency later than others and may need greater resources to support their learning.

On the other hand, if students across subgroups are developing English proficiency at the same rate and are not being redesignated at the correct time, it suggests there may need to be revision to the redesignation criteria or their implementation. Although our analyses cannot differentiate between these two explanations, and a combination of both may be occurring, continuing to monitor redesignation outcomes is an important component of ensuring equality of educational opportunities for Colorado's ML students.

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# Appendix A

## **Body of Evidence for Redesignation to FEP-M1**

**Student:** \_\_\_\_\_ **Grade:** \_\_\_\_\_

**School of Attendance:** \_\_\_\_\_

| <b><u>Annual ACCESS Proficiency Assessment</u></b>                                                                                                                                                |                                     |                               |                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------|-------------------------------------------------------|
| <b><u>Composite Scores</u></b>                                                                                                                                                                    | <b><u>Proficiency Score</u></b>     | <b><u>Points Possible</u></b> | <b><u>Points Earned</u></b>                           |
| <b>Literacy</b>                                                                                                                                                                                   | Proficiency Levels <b>5.5-6.0</b>   | 3                             |                                                       |
|                                                                                                                                                                                                   | Proficiency Levels <b>5.0-5.4</b>   | 2                             |                                                       |
|                                                                                                                                                                                                   | Proficiency Levels <b>4.5-4.9</b>   | 1                             |                                                       |
| <b>Overall</b>                                                                                                                                                                                    | Proficiency Levels <b>5.5-6.0</b>   | 3                             |                                                       |
|                                                                                                                                                                                                   | Proficiency Levels <b>5.0-5.4</b>   | 2                             |                                                       |
|                                                                                                                                                                                                   | Proficiency Levels <b>4.5-4.9</b>   | 1                             |                                                       |
| Points Earned from ACCESS                                                                                                                                                                         |                                     |                               |                                                       |
| <b><u>Grade Level Reading</u></b>                                                                                                                                                                 |                                     |                               |                                                       |
| <b>As evidenced by...</b><br><br>(Enter source here)                                                                                                                                              | Exceeds Grade Level Expectations    | 3                             |                                                       |
|                                                                                                                                                                                                   | Meets Grade Level Expectations      | 2                             |                                                       |
|                                                                                                                                                                                                   | Approaches Grade Level Expectations | 1                             |                                                       |
| <b><u>Grade Level Writing</u></b>                                                                                                                                                                 |                                     |                               |                                                       |
| <b>Grade Level Independent Extended Writing Sample</b>                                                                                                                                            | Exceeds Grade Level Expectations    | 3                             |                                                       |
|                                                                                                                                                                                                   | Meets Grade Level Expectations      | 2                             |                                                       |
|                                                                                                                                                                                                   | Approaches Grade Level Expectations | 1                             |                                                       |
| <b>Total Points Earned</b>                                                                                                                                                                        |                                     |                               | ___                                                   |
| A student must earn <u>at least 6 points</u> with <u>at least 1 point</u> earned from each section (ACCESS, Grade Level Reading & Grade Level Writing) to be re-designated to FEP-Monitor Year 1. |                                     |                               |                                                       |
| Will this student be re-designated?                                                                                                                                                               |                                     |                               | <input type="radio"/> Yes<br><input type="radio"/> No |

**Date:** \_\_\_\_\_ **Completed by:** \_\_\_\_\_

Redesignation Criteria May 2018

## Appendix B

The eligibility and redesignation rates in Tables 2 and 3 are based on a larger sample than the primary analyses. Rates are calculated using the longitudinal data provided by CDE, but with less restrictive samples. To calculate the historical rates, we keep each record for LEP or NEP students who have non-missing ACCESS scores and who are observed enrolled in a Colorado public school in the following grade and year with non-missing language proficiency status. This restriction is made one grade at a time. Thus, the sample of students for whom the rates are calculated in Tables 2 and 3 can change from grade to grade. Our primary analytic sample is a subset of the students included in Tables 2 and 3. Table B1 reports the sample size for each grade and year of students included in these calculations.

**Table B1. Sample size for historical eligibility and redesignation rate calculations**

| Grade | 2017  | 2018  | 2019  | 2020 | 2021 | 2022 | 2023 |
|-------|-------|-------|-------|------|------|------|------|
| 1     | 10556 | 10308 | 9708  | 9491 | 7727 | 8908 | 9627 |
| 2     | 11361 | 10778 | 10260 | 9861 | 7892 | 8978 | 9381 |
| 3     | 11299 | 11019 | 10217 | 9677 | 7573 | 8689 | 8837 |
| 4     | 9175  | 9951  | 9285  | 8713 | 6801 | 8231 | 7984 |
| 5     | 7829  | 7930  | 7874  | 7517 | 5547 | 7047 | 6608 |
| 6     | 6374  | 6475  | 6293  | 6146 | 4266 | 5549 | 5428 |
| 7     | 6352  | 6158  | 6082  | 5898 | 4230 | 5372 | 5668 |
| 8     | 6212  | 5753  | 5473  | 5464 | 4036 | 5411 | 5394 |
| 9     | 6095  | 5373  | 5005  | 4838 | 3089 | 5010 | 5176 |
| 10    | 3968  | 4844  | 4189  | 4008 | 2573 | 3779 | 4501 |
| 11    | 2827  | 3344  | 3521  | 3276 | 2065 | 3006 | 3377 |