# Compliance to Capacity: Colorado's Evolving Approach to District Improvement

Colorado Department of Education

University of Virginia Partnership for Leaders in Education

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This case explores how the Colorado Department of Education's (CDE's) approach to district support evolved from one focused primarily on compliance and regulation to one that more intentionally pairs accountability with capacity-building through aligned funding, technical assistance, and strategic partnerships. At its core, the case frames how a state can organize accountability and support so that improvement efforts move beyond plans and compliance requirements to meaningfully strengthen what students experience and achieve. Further, the case examines those policies that shaped Colorado's accountability system, the concerns that prompted CDE to reconsider how improvement support was organized and frames the steps the agency took to better coordinate assistance across state offices. Colorado's experience suggests that accountability is most effective when expectations and consequences are accompanied by the capacity to meet them. Sustainable school improvement requires a state agency to go beyond identifying underperformance and requiring corrective plans through coordinating their own systems, recognizing the district as a critical unit of change, aligning resources with strategy, and sharing responsibility for creating the conditions for which improvement can occur.

**Establishing a Statewide Accountability Structure**

In 2009 Colorado's General Assembly passed the Education Accountability Act, creating a more unified statewide structure for reviewing school and district performance, assigning improvement plan types, accrediting districts, and identifying systems requiring additional attention. The law also requires every school and district to develop an annual improvement plan and submit it to the Colorado Department of Education. A Unified Improvement Plan (UIP) was designed to bring state, federal, and grant-funded program requirements into a single

plan[1]. Although continuous improvement was the goal, the process often functioned as an exercise in compliance. While an accountability system had been established, local district personnel, especially those in rural or high poverty areas, didn't always have the capacity, resources, or external supports needed to respond appropriately.

The under-resourced mandate was not the only challenge faced by school districts. Funding for improvement grants was often administered through separate processes. This meant district stakeholders were having to complete several applications that requested similar data sets, needs assessments, goals, and implementation plans. Further, each grant may have had different allowable uses, fiscal calendars, reporting deadlines, and performance measures. This consumed time from school- and district-level instructional leaders, finance staff and grant personnel who were already managing at a limited capacity. Rather than aligning resources behind their most important strategic priorities, districts often designed disconnected activities around the grant's funding parameters.

**Reimagining the State's Role**

For years, Colorado's accountability system had provided a clear signal when a school or district was not meeting expectations. Colorado's accountability clock tracked the consecutive years a school or district received low-performance ratings and clarified when the state would intervene[2]. However, it did not automatically provide districts with the knowledge, leadership

[1] From Colorado Department of Education overview of state accountability system: Summary and purpose: https://resources.finalsite.net/images/v1779997446/cdestatecous/ytl1qphf39ultwtvl8vx/AccountabilityFactSheet-Mar2024.pdf

[2] To learn more about the Accountability Clock, visit https://www.cde.state.co.us/communications/accountabilityclockfactsheet

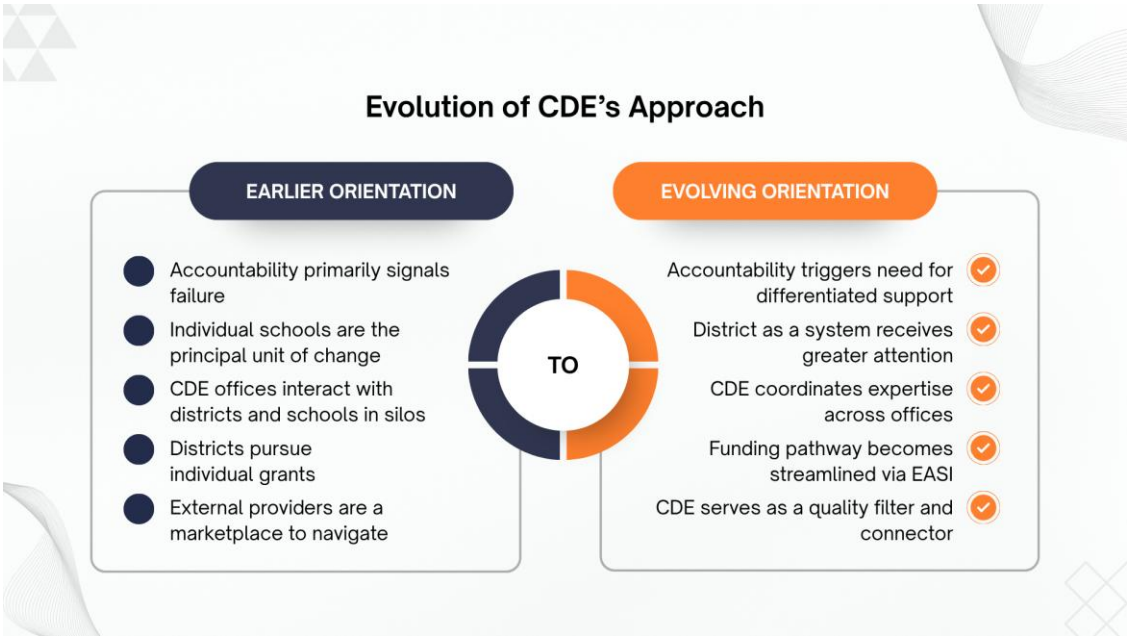
stability, organizational structures, or financial capacity needed to improve. In reality, a school could complete every component of its plan and still fail to make progress. CDE leaders understood they had a responsibility for helping districts and schools improve before they reached the point of formal state action and needed to rethink their current support structure. Andy Swanson[3], Executive Director of Improvement and Innovation, noted that the bureaucracy of "CDE itself was actually the bigger barrier than principals and superintendents".

*From Fences to Wells*

Within CDE, leaders began using a simple metaphor to describe the shift they wanted to make: Building wells rather than fences. Fences establish boundaries. They tell people where to go and what to do. School and district leaders saw CDE as an entity that told them where they had fallen short, and what consequences would follow as a result. Wells, on the other hand, provides something people can draw upon. CDE leaders wanted to make sure they were seen as an agency LEAs could easily approach for expertise, tools, financial resources, and practical support. The department's goal was to shift from a primarily compliance-driven relationship toward one that joined accountability with proactive, collaborative, and credible support.

[3] Information attributed to Andy Swanson is taken from a Zoom interview conducted 9 June 2026.

**Figure 1: Comparison of CDE's Earlier Practices to Evolving Practices**




This shift wasn't easy. CDE couldn't remove every fence, as state education agencies (SEAs) still have legal, fiscal, and accountability obligations. Members of the CDE team noticed relationships with the lowest-performing districts were strained at best, with some leaning towards more combative in nature. "We needed to be more proactive in how we reach out to these districts", said Carol Mehesy[4], Senior Advisor for School and District Transformation. "We flipped to a partnership approach, wanting to help schools and districts understand that their wins and losses are ours as well", shared Andy Swanson. He hoped the partnership approach could help make difficult conversations more productive because responsibility was no longer placed entirely on the district or school. As relationships began to improve, CDE leaders found

[4] Information attributed to Carol Mehesy is taken from a Zoom interview conducted 28 May 2026.

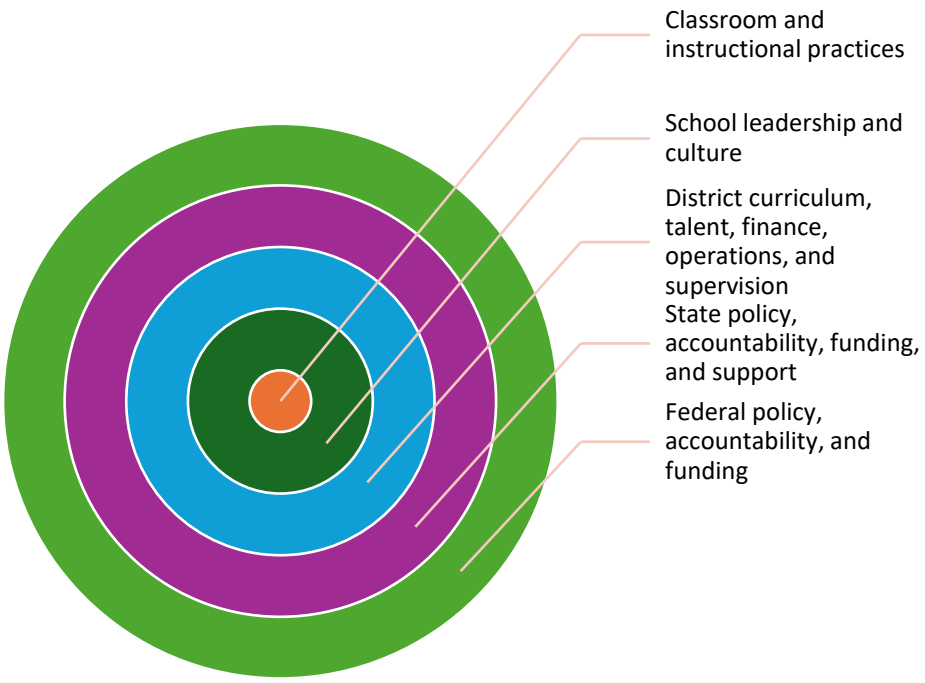
that while improvements often centered on individual schools, the most prominent barriers didn't sit inside the school, rather inside the district.

*Reconsidering the Unit of Change*

Initially, CDE concentrated its improvement efforts on individual schools. Staff visited schools on the accountability clock and spent much of their time reviewing compliance requirements with principals, including improvement plans, budgets, and monitoring documentation. Principals were expected to strengthen instruction and improve student outcomes, but many of the conditions shaping their success were beyond their direct control. Decisions about curriculum adoption, hiring procedures, principal supervision, and professional learning priorities were often made by the district. Over time, CDE leaders began to recognize that individual school improvement would require them to give greater attention to the district-level systems and processes influencing them.

Although teaching and learning occur most directly in classrooms, the conditions surrounding that work are shaped across multiple levels of the educational system. Figure two illustrates these interconnected layers and helps explain why CDE began looking through individual schools when considering how to support sustainable improvement.

**Figure 2: Schools Within Systems – Expanding the Unit of Change**




**Viewed this way, the district is now seen as a critical part of the system that must be strengthened so that school level changes can take hold, spread, and last**. This broader systems view led CDE to look more closely at the district level policies, practices, and organizational conditions influencing that performance. Districts were expected to address systemic challenges and identify well-matched external partners, even though their capacity to do so varied considerably. Even when the state provided strong support to an individual school, improvement might not last if the surrounding district systems remained unchanged. Out of this understanding began to emerge a tiered support model that looked beyond test scores. CDE formed cross-organizational teams to explore indicators across areas that included academics, accountability, student and community engagement, operations, finance, and

talent. In doing so, they were able to identify where districts may be experiencing distress, and where earlier support may prevent problems from becoming more severe.

**Building Internal Coherence**

As CDE encouraged districts to align their priorities, systems and resources, the agency understood they needed to do the same. Under the current structure, CDE's improvement work often lacked coherence and focused heavily on compliance, with siloed offices. "In complex systems, coherence is a big lever, and a hard one to achieve", reflected Carol Mehesy. The fragmentation sometimes resulted in multiple CDE personnel visiting the same low-performing school to discuss similar requirements and recommend different strategies without knowing their colleagues were also working at that school. They needed to coordinate the department's existing expertise by bringing together staff who had previously approached schools and districts through different responsibilities, including those involved in federal and state accountability, school and district transformation, grant funding, and broader support for superintendents and district leaders. In practical terms, the goal was for any school or district to experience CDE as a unified support system rather than a collection of disconnected offices.

During this coordination effort, the agency mapped out their services, identified areas of duplication or redundancy, identified gaps, and clarified how specific supports were connecting to district needs. This mapping process also provided clarity to those barriers to improvement that existed within CDE itself. Among the greatest barriers was the bureaucracy that existed along with its well-established processes and structures that could make it difficult to move quickly or try something new. Assistant Commissioner of School Quality and Support, Lindsey

Jaeckel, was a former K-12 practitioner and understood that meaningful change would require giving people room to work differently. She began by starting with a small coalition of dedicated and willing staff and gave them space to test ideas, learned from what worked – and what did not – and innovate without immediately getting slowed down by the larger bureaucracy. Over time, that protected space would allow for new approaches to take shape and build momentum. In addition to greater coordination and freedom to innovate, CDE needed a shared way of talking about improvement that could connect the work of different teams and create greater consistency in how the SEA partnered with districts. That need led to the adoption of a common framework.

**Creating a Common Language for Improvement**

CDE adopted the Four Domains for Rapid School Improvement[5], adapted from the Center for School Turnaround and Improvement's Four Domains as a research and evidence-based framework that can be applied across the state agency along with districts and schools. The language within the four domains: Leadership for Rapid Improvement, Talent Management, Instructional Transformation, and Culture and Climate Shift provided CDE staff and district leaders with a common language when discussing the levers districts were able to control, services already provided by CDE, external partnerships, and potential funding sources. CDE also used this shared framework to keep high-quality instructional materials (HQIM)[6] and instructional coherence at the core of their improvement efforts. That focus extended beyond selecting standards-aligned, evidence-based curricular resources to supporting consistent

[5] From CDE Four Domains for Rapid School Improvement: https://ed.cde.state.co.us/fourdomains
[6] *Source: https://ed.cde.state.co.us/standardsandinstruction/support/curriculum-adoption-and-implementation*

implementation through professional learning, leadership support, aligned instructional practices, and sustainable district systems. Rather than treating organizational improvement and instructional improvement as separate priorities, the Four Domains Brought them together.

**Figure 3: Colorado Framework for Rapid School Improvement**

*Source: https://ed.cde.state.co.us/fourdomains*

Along with the framework, school and district leaders needed practical ways to apply it to their planning and improvement efforts. CDE therefore developed tools and resources to support district- and building-level leaders, including a rubric designed to help districts assess their needs, identify gaps, and align services. "We needed to stop giving 50-page books on everything that needed to be done as a building administrator," said Andy Swanson. "If we are

asking someone to do something, it needs to be understandable." Lindsey Jaeckel added that it also needed to be "actionable for very busy school and district leaders. Together, the framework and supporting tools facilitated the states moving away from selecting improvement activities one at a time and toward designing a connected theory of action linking identified needs, strategies, supports, and intended outcomes. For districts to be able to act on these priorities, CDE also had rethink about how schools and districts accessed the funding and supports needed to carry the work forward.

**Simplifying How Districts Access Resources**

State and federal systems and processes to identify need didn't always align, causing districts to struggle to access them strategically. Funding streams could have separate eligibility requirements, applications, timelines, and allowable uses. District leaders, particularly those in smaller systems, may lack the capacity to navigate grant opportunities while also managing the improvement work along with grant reporting requirements. CDE leaders responded by establishing the Empowering Action for School Improvement[7], or EASI application designed to streamline the process for federal and state funding opportunities. CDE then applies a needs-based approach to determine which services, and funding sources fit a district's circumstances while aligning state and federal accountability systems to the extent possible. More importantly, resources are then able to be directed towards multi-year improvement initiatives rather than isolated activities. Instead of spending time on deciding which grant to apply for, CDE and partnering school districts were working to determine what specifically needed to be

[7] From Empowering Action for School Improvement (EASI) https://ed.cde.state.co.us/fedprograms/easiapplication and stakeholder interviews.

accomplished, and which combination of funding and support would give it the best chance of succeeding.

EASI paves the way for districts to access different types of supports depending on where they are in the improvement process. Some districts may need help diagnosing a problem or developing a strategic plan. Others may already have a clear strategy and need implementation funding, coaching, leadership development, or another form of technical assistance. In this way, funding becomes connected to a broader continuum of support rather than being treated as a stand-alone intervention. This approach also pushed CDE and its district partners to think differently about resource allocation. Funding alone wasn't going to lead to sustainable improvement. Sam Schneider[8], School and District Transformation manager, recalled a time when he and Carol Mehesy were providing support to a struggling district with a lot of leadership turnover, declining enrollment, and significant financial challenges. Tax revenue had been withheld, and the district almost failed to meet payroll. CDE and district leadership worked with an external partner to develop a multi-year strategic plan. Rather than beginning with available grants, the team first identified the district's major priorities. "We mapped out the existing funding streams, the big parts within the plan, and identified the funding sources that made the most sense to utilize," said Sam. The process reflects the broader shift in thinking that resources should follow a strategy, rather than a strategy being built around whatever funding happens to be available. CDE began asking whether investments were aligned to district priorities, whether the district had the capacity to implement the work,

[8] Information attributed to Sam Schneider is taken from a Zoom interview conducted 22 June 2026.

and whether the investment itself was likely to help build capacity that would remain after the grant ended.

**Helping Districts Choose the Right Partners**

CDE leaders recognized that having more external partner options available did not make it easier for districts to identify the right support. Burlington School District's experience illustrates this challenge. "We knew we had issues, and we knew we needed help," reflected former Burlington Superintendent Shane Walkinshaw[9]. The district had begun its improvement efforts with another provider but was not making the progress leaders hoped to see. Experiences like Burlington's prompted CDE to take a more active role in identifying and vetting external providers. Through a request-for-information process, the department reviews potential external partners offering support in a variety of areas including school improvement, diagnostic reviews, strategic planning and implementation, and leadership development. This approach gives districts greater confidence that potential partners have relevant experience while preserving their autonomy to choose support that fits their needs and local context.

District leaders can use the resulting list of vetted providers to consider what each organization offers, whether its approach fits the problem they are trying to solve, and how that work may have played out in other Colorado districts. As Carol Mehesy described it, "a lot of what we do is honoring district choice, looking at their own needs and sharing information on what the providers can give". Further, CDE reduces redundancy by allowing assessments and plans developed through vetted partners. Districts may use a partner's assessment as their

[9] Information attributed to Shane Walkinshaw is taken from a Zoom interview conducted 16 July 2026.

district diagnostic rather than completing a separate process solely to satisfy state requirements. Related planning documents may also fulfill state requirements. "We were allowed to upload the provider's 90-Day Plan as the state action plan," shared Mapleton Superintendent Mike Crawford[10] who had described the old process as being "cumbersome". The state serves as both a quality filter and connector, establishing criteria for providers, making potentially high-impact options easier for districts to identify, and giving them access to information they may not have the capacity to gather on their own. At that same time, districts retain an important role in determining whether a provider's approach fits their goals, people, and context.

*PLE: A Portrait of a Partner*

While CDEs catalog of external partners was carefully curated and reviewed annually based on feedback from districts and schools, the organizations included on the list were not intended to serve the same purpose. Because district needs varied, the expertise brought for the work needed to vary as well. Some partners supported diagnostic review and strategic planning, while others focused on implementation, instructional improvement, financial and operational systems, or stakeholder engagement. Others worked more directly on developing the leadership capacity needed to sustain improvement over time.

One example of this latter approach is the Partnership for Leaders in Education (PLE), a program that "that utilizes a systemic approach to change by working with schools, districts,

[10] Information attributed to Mike Crawford is taken from a Zoom interview conducted 6 July 2026.

and states to build internal capacity[11]". Their approach combines leadership development, evidence-based instructional strategy, and tailored thought-partnership to strengthen system and school leadership. PLE's work expands beyond providing training to building principals and supports superintendents, district leaders, and teachers through multi-year partnerships intended to create conditions for scalable and sustainable improvement. This orientation aligns with CDE's evolving emphasis on the district as the unit of change. A partnership like PLE may help a district examine:

- Whether leaders share a clear set of priorities,
- How central office practices may support or impede schools,
- The capacity of principal supervisors to lead improvement,
- How resources reinforce strategic priorities, and
- Processes for how implemented strategies are monitored and adjusted.

For Mapleton, the partnership was transformational. "We had work to do on system conditions and knew a lot of it would be district-level", reflected Superintendent Crawford. Mapleton's experience illustrates a broader lesson emerging from CDEs efforts in that sustainable improvement depends on not only choosing the right strategy, but also on developing the leadership capacity needed to carry that strategy forward. For the state agency, it meant reconsidering what the state needed to provide alongside accountability. The challenge turned into maintaining clear expectations and a sense of urgency while also

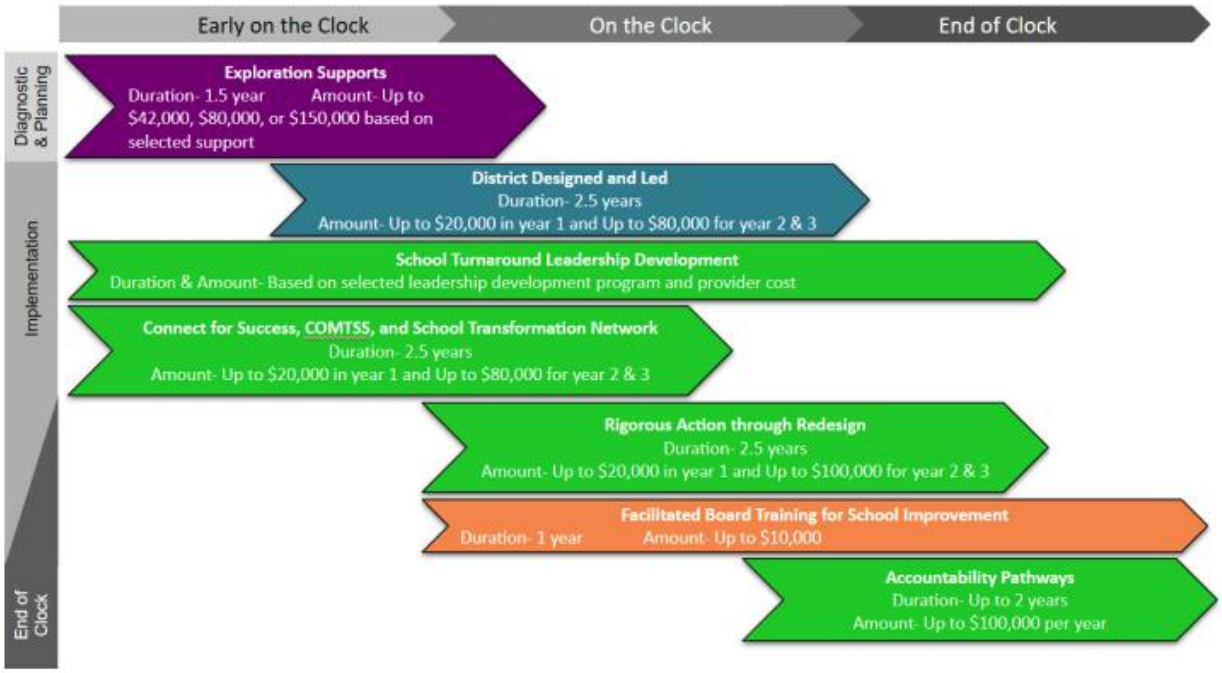
[11] From Darden/School of Education Partners for Leadership in Education: https://education.virginia.edu/research-initiatives/partnerships/dardenschool-education-partnership-leaders-education

providing districts with resources, supports, and the thought partnership needed to respond effectively and sustain improvement over time.

**Accountability and Partnership Working Together**

Ultimately, the accountability clock still matters. Performance expectations remain public and districts and schools still face state-directed action after persistent low performance. The CDE team adjusted how they engage with districts as they move around the clock. They began to think more intentionally about how districts could be supported on all phases of the clock. Rather than treating accountability and support as separate functions, CDE increasingly connected them.

**Figure 4: Supports Throughout CDE's Improvement Cycle**




*Source: https://www.cde.state.co.us/fedprograms/easifairsummary*

Depending on the district's circumstances and readiness, support may include a diagnostic process to better understand a problem, assistance with prioritization and planning, early implementation funding, coaching or professional learning, or funding for a district-designed improvement strategy. The continuum becomes more important as schools and districts move closer to the end of the accountability clock. CDE's responsibility extends beyond directing a course of action to help create the conditions for that action to succeed. In this way, more rigorous action increases accountability on both sides: Districts remain responsible for improving outcomes while CDE assumes greater responsibility for providing a coherent system of support. This balance remains a work in progress as the CDE team members get feedback from districts and continue to refine how to coordinate accountability and support, how to determine the level and type of assistance a district needs, and how early to intervene.

**Emerging Evidence Across Districts**

Although this case focuses primarily on the design of Colorado's improvement system, those changes matter only if they ultimately contribute to stronger experiences and outcomes for students. In complex improvement work, it can be difficult to isolate the effects of a single partner, funding stream, or state policy. Still, emerging results across several Colorado districts illustrate the kinds of progress that aligned funding, sustained partnership and system-level capacity building can help make possible.

*Mapleton Public Schools*

Recent results in Mapleton Public Schools, a PLE partner, illustrate the progress that can emerge. In 2026, 10 of 12 Colorado Measures of Academic Success (CMAS) grade level assessments improved, outpacing statewide gains, while every Mapleton school earned one of

Colorado's top two accountability ratings. Middle school mathematics showed particularly strong progress with proficiency increasing from 10.6% to 15.6% and student growth rising from the 38th to the 45th percentile[12]. Superintendent Mike Crawford connected this progress to a deeper shift in the district's daily work:

> The data from PLE's pre-assessment was eye-opening, What PLE really helped us to do is connect our practices to our purpose. Now we have more belief because we're doing things every day that will lead kids to achieving their dreams.

*Other Signs of Progress*

Burlington, Denver, and Boulder Valley represent a range of district contexts, ranging from a small rural system to large urban and regional districts. Their results provide an opportunity to examine how progress can take different forms depending on a district's starting point, needs, and capacity.

**Table 1: Assessment Highlights Across Districts**

| ***District*** | **2025-2026 Highlights** |
|---|---|
| Burlington | • 3rd Grade Math: 16 Point Increase<br>• 4th Grade ELA: 12 Point Increase<br>• 8th Grade Math: 11 Point Increase<br>• Overall Improvement in 4 out of 12 Grade Level Assessments. |
| Denver | • 4th Grade ELA: 6 Point Increase<br>• 6th Grade Math: 4 Point Increase<br>• 8th Grade Math: 4 Point Increase<br>• Mathematics scores Improved in All Tested Grades<br>• 10 of 12 grade level assessments improved |
| Boulder Valley | • 5th Grade ELA: 3 Point Increase<br>• 6th Grade Math: 3 Point Increase |

[12] CMAS Data and Results: https://ed.cde.state.co.us/assessment/cmas/cmas-dataandresults?utm

- 8th Grade Math: 4 Point Increase
- Overall Improvement in 7 out of 12 Grade Level Assessments

These results show encouraging progress across all four districts. The differences among these districts also reinforce the importance of matching assistance to local needs rather than relying on a single improvement strategy across every context.

**Lessons Learned From CDE's Journey**

CDE's experience offers several lessons for other state education agencies working to strengthen their own improvement systems. Among the most important are creating coherence across state-level departments and the value of treating districts as a critical unit of change. Just as importantly, CDE's journey underscores that sustainable improvement depends on balancing accountability with capacity-building, scaffolded partnerships, and long-term support. For state agencies considering a similar shift, five key takeaways stand out:

*Create Protected Space for Innovation*

Large state agencies often rely on established structures and processes that can make it difficult to test new approaches. Recognizing this constraint, CDE leaders were intentional in creating space for a small coalition of willing staff to think and work differently. These individuals were given the flexibility to test ideas, learn early results, and refine emerging practices without immediately being slowed by the larger bureaucracy. SEAs should take away from this that innovation should not have a degree of accountability or oversight, rather that leaders may need to be more intentional in providing staff with the time, authority, and organizational protection to challenge existing practices and show what a different approach

could look like. Small, supported prototypes can generate learning and momentum before resources are spent expanding a new practice across an agency.

*Build Coherence Inside the State Education Agency*

A state cannot reasonably ask districts to create coherent improvement systems while presenting them with disconnected offices, frameworks, and timelines. To build coherence, the CDE team adopted the Four Domains for Rapid School Improvement and then brought their departments together to intentionally map out the supports they were able to provide to districts. By reducing duplication, clarifying internal roles, and creating a more consistent for district leaders, CDE was demonstrating they were willing to examine and change their own practices. This willingness also helped to build trust and strengthen CDE's credibility as a partner in improvement rather than being seen solely as a monitor of accountability.

*Treat Districts as Critical Units of Change*

Because individual schools operate within systems, SEAs need to examine the district-level conditions that influence staffing, instruction, leadership, scheduling, resource allocation, and principal support. Strengthening district capacity in these areas can help ensure that individual schools are not left to improve in isolation, and that successful practices are more likely to be supported, scaled, and sustained over time.

*Connect Accountability to Differentiated Support*

While identifying low performance is necessary, SEAs need to be explicit in how that identification process helps to activate supports that include funding, technical assistance, leadership development, and district-level capacity-building. Through the EASI application and its broader continuum of cohort support, CDE worked to connect identified needs with

diagnostics, coaching, implementation assistance, external expertise, and aligned funding. If a district's needs were more significant, the level of supports offered should increase as well. This reflects a more balanced understanding of accountability: districts remain responsible for their strategies and results, while the state assumes responsibility for providing coherent and conditions and support. The accountability clock therefore determines when state action should intensify and when support should deepen.

*Help Districts Become Informed Consumers of Support*

SEAs can vet providers, clarify expectations, and provide useful information while preserving district autonomy in choice. CDE did this by establishing a review process for external partners and creating a curated pool of providers with expertise across different areas of improvement. Districts could then consider their own priorities, learn what different partners offered, and select the supports that best matched their context rather than being assigned an external provider by the state. For example: the CDE team identified PLE as a strong option when districts were seeking leadership development and system support, while recognizing that other needs might call for different types of expertise. Ultimately, the SEA made it easier for districts to make informed choices.

**Toward a More Supportive Accountability Structure**

CDEs evolving approach reflects a broader understanding of the role of a state education agency. Rather than concentrating exclusively on individual schools or waiting until districts approach the end of the accountability clock to take action, the department is coordinating efforts to identify distress earlier, to examine the district-level systems supporting schools, and to connect resources to locally determined priorities. The adoption of the

Colorado Framework for Rapid School Improvement, the EASI application, and the maintaining of a vetted network of external partners represent an emerging infrastructure intended to make accountability more actionable.

Within this evolving approach still exists the inherent tension between oversight and partnership. "We are lucky at CDE that we have people who are former practitioners and site-based leaders", said Sam Schneider. "As an organization shifts from compliance to quality, you need to consider who you have on the bus to lead this; people with the right dispositions to say we can do better yet meet the compliance requirements". CDE must continue to uphold legal requirements, be stewards of public resources, and intervene when performance doesn't improve. In turn, districts must remain accountable for the quality of their selected strategies and the outcomes they are designed to achieve. Sustainability requires those district actions along with the state's need to maintain coherent policies, funding structures, and systems of support. Accountability is therefore both shared and distinct in that districts must lead and sustain the improvement work, while the SEA must help create the conditions in which that important improvement work has a reasonable chance to succeed.

The CDE team acknowledges that this work remains unfinished. They and their district partners have questions about just how early the state should intervene, how support should be differentiated, how the effectiveness of external partners should be assessed, and how emerging improvements can survive changes in leadership and/or funding. These questions should be seen as evidence of continuing work towards a more coherent improvement system. While the accountability clock can tell a system when time is running out, it can't build the

capacity needed to change course. Colorado's evolving model suggests that the state's most consequential role may be what it builds around the clock, rather than monitoring the clock itself.