

## Summary of Public Comment on the 2022 ESSA Amendment

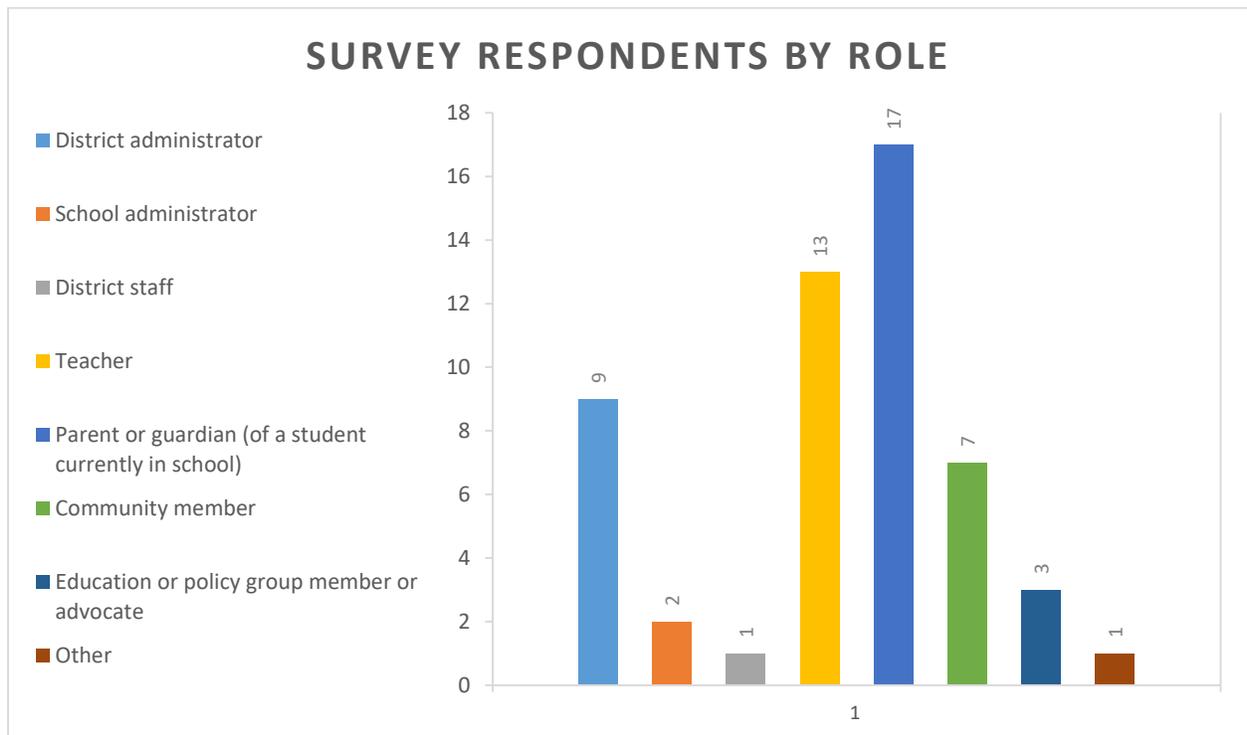
### Process

ISBE followed its standard process for public comment for the 2022 ESSA amendment, which included posting the amendment to the ISBE website and sending notification of the opportunity for comment via the Superintendent's Weekly Message. ISBE also added an announcement slider to the ISBE homepage. A full redline draft of the amendment was published for public comment on December 15, 2021 on both the ESSA and Summative Designation pages. Additional resources to support public comment included a page-by-page guide of all changes in the redline plan and a video and associated slide deck describing all the changes and the rationale for them. Comments could be submitted via a streamlined survey, email or letter. Both digital options were link directly below the draft amendment and supporting resources. The public comment window remained open for a full 30 days. However, to further support stakeholder engagement, six live open forum webinars open to the public were held on November 22 and November 30, December 20 and 21, and January 10 and 11, to review the proposed changes and collect feedback. Public comment closed on January 14, 2022, in order to permit time for analysis, and incorporation or response of public comments.

### Summary of the Survey Responses and Feedback from the Open Forums

A total of 42 survey responses were received. A breakdown of the survey responses follows. Comments submitted via the survey are addressed in the written comments section.

**Chart 1.** Makeup of Survey Respondents



More administrators attended the open forum webinars, and provided their comment and input in that way. A total of 139 people attended the webinars, 29 of which attended multiple webinars (as was encouraged) for a total of 183 participants. Of the 139 unique participants, 96 (69.1 percent) registered with a district email addresses, suggesting a school or district administrator or educator, 14 (10 percent) registered with an ROE email address,

and 29 (20.9 percent) registered with other types of email addresses suggesting a stakeholder group, university or research organization, or personal account.<sup>1</sup> Participants in these webinars were asked questions similar to those in the survey via an interactive polling tool. Those results are presented alongside the survey results.

### **ELA and Math Proficiency**

The survey asked two questions regarding ELA and math proficiency targets, one focused on the use of 2021 assessment results to set targets for the group of students in school during years when assessment and accountability waivers were received. The other pertained to the use of 2023 assessment results to set targets for the group of students entering school beginning in the first year after waivers were received. The responses to both questions were consistent. A majority (66.7, n=42) supported or strongly supported the proposed method of setting new ELA and math proficiency targets. Of those who opposed (33.3 percent, n=42), a majority were parents, whose comments indicated they were opposed to the act of testing itself, not the proposed method of setting proficiency targets per se.

From the webinars, a majority (57.9 percent, n=139) supported the proposal, but it is worth noting that respondents preferred the proposal to use the 2021 results to set new targets for all students, including those who are entering school after the waiver years.

**Response:** ISBE will maintain the proposal to use the 2021 results to set new proficiency targets for students in the waiver cohort, with the plan to use 2023 results to set targets for post-waiver cohort of students. In the intervening years, ISBE will examine multiple sources of data, including local assessments where possible, to determine (1) if the 2023 results would result in more ambitious targets and (2) if such more ambitious targets are appropriate. If the data do not support implementation of the second set of targets, an amendment would be made to expand the waiver targets to all students.

### **Science Proficiency**

The proposal to replace science proficiency rates with science participation rates in 2022 also received strong support, with 66.7 percent supporting or strongly supporting, 33.3 opposed and two had no opinion (n=42). As with ELA and math proficiency, the opposition appears to be from parents opposed to testing broadly, rather than the specific proposed change. Respondents from the webinars, which were predominantly administrators or educators, overwhelmingly supported the proposal, with 97.8 percent supporting and only 2.2 percent opposed (n=139). Webinar respondents were also invited to respond to the proposed scoring ranges, and there was majority support (61.3 percent for the upper range of 95 percent and 64.5 percent for the lower range of 75 percent).

**Response:** ISBE will maintain the proposal to replace science proficiency rates with science participation rates as presented.

### **English Learner Progress to Proficiency (ELPtP)**

The survey included two questions about the proposed changes related to ELPtP. Regarding the proposal to add a year to the timeline of all EL students from SY2020-21, 76.2 percent supported or strongly supported the proposal, 16.7 percent opposed and two respondents had no opinion (n=42). Regarding the proposal to use the higher of a gain score calculated using either the 2020 or 2021 prior score, the same 76.2 percent (n=42) supported, although there was a shift from those strongly supporting to supporting. Only 11.9 percent opposed, with 5 having no

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<sup>1</sup> It is possible some of those using a personal email account might have been affiliated with a district or ROE but using a personal account in remote conditions.

opinion (n=42). The opinions of webinar participants were similar but stronger, with 94.4 percent supporting the proposal to give all ELs an additional year to the timeline and only 5.6 percent opposed (n=139).

**Response:** ISBE will maintain the proposal to give all ELs from SY2020-21 an additional year to their timeline. ED determined that the use of a “higher of” calculation methodology is not permissible, therefore, ISBE will use only the 2020 ACCESS data set in its calculations.

**Student Growth**

Both the survey and webinar respondents were asked about the proposal to calculate growth using either the higher of either a cohort-referenced or baseline-reference SGP. In general, both groups supported this proposal (73.8 percent of survey respondents, n=42; 57.1 percent, n=139).

**Response:** ED’s determination that “higher of” calculation methodologies are not permissible applies to this proposal as well, therefore ISBE will wait until its 2022 growth data is available. If, for a majority of students, the cohort-referenced SGP calculation is higher than the baseline-referenced SGP, only the cohort-referenced data set will be used. This is the mostly likely anticipated scenario. However, if, for a majority of students, the baseline-referenced SGP calculation is higher than the cohort-referenced SGP, only the baseline-referenced set of data will be used.

**Chronic Absenteeism**

Regarding the proposal to establish, for one year, differentiated scoring bands based on improvements to chronic absenteeism, opinion was divided, with 47.6 percent of survey respondents supporting, 42.9 percent opposing, and three with no opinions (n=42). Of those opposed, a majority are parents, with the next largest group being teachers. The comments suggest opposition is driven by concern that having chronic absenteeism (or attendance generally) as a part of accountability will create pressure for students and staff to attend when ill. The proposal received greater support from webinar participants, with 66.7 percent supporting differentiation based on improvements to chronic absenteeism in SY2021-22 over SY2020-21, and 61.9 percent supporting a band based on proximity to pre-pandemic levels (n=139).

**Response:** ISBE will maintain the proposal to use differentiated scoring bands. Additionally, a preliminary data analysis of SY2021-22 attendance data suggests that the proposed differentiated scoring bands themselves are reasonable.

**Table 1.** Counts and Percentages of Schools by Differentiated Scoring Band, Disaggregated by School Type

School Level	None	5 Percent	10 Percent	15 Percent	20 Percent	25 Percent
Elementary School (ES) Count	1004	374	130	76	67	201
High School (HS) Count	218	89	24	26	12	51
School Level	None	5 Percent	10 Percent	15 Percent	20 Percent	25 Percent
ES Percent	54.21%	20.19%	7.02%	4.10%	3.62%	10.85%
HS Percent	51.90%	21.19%	5.71%	6.19%	2.86%	12.14%

**Table 2.** Counts and Percentages of Elementary Schools by Differentiated Scoring Band, Disaggregated by Student Demographic Group

<b>ES Student Groups Count</b>	<b>None</b>	<b>5 Percent</b>	<b>10 Percent</b>	<b>15 Percent</b>	<b>20 Percent</b>	<b>25 Percent</b>
Asian	178	135	27	10	4	19
Black or African American	249	47	45	36	53	224
CWD	33	21	15	10	6	42
EL	469	91	47	37	24	122
Former EL	223	84	26	14	8	48
Hispanic or Latino	656	110	73	45	40	122
Low Income	876	195	114	104	92	335
Two or More Races	153	65	34	24	24	98
White	863	465	108	66	61	120
<b>ES Student Groups Percent</b>	<b>None</b>	<b>5 Percent</b>	<b>10 Percent</b>	<b>15 Percent</b>	<b>20 Percent</b>	<b>25 Percent</b>
Asian	47.72%	36.19%	7.24%	2.68%	1.07%	5.09%
Black or African American	38.07%	7.19%	6.88%	5.50%	8.10%	34.25%
CWD	25.98%	16.54%	11.81%	7.87%	4.72%	33.07%
EL	59.37%	11.52%	5.95%	4.68%	3.04%	15.44%
Former EL	55.33%	20.84%	6.45%	3.47%	1.99%	11.91%
Hispanic or Latino	62.72%	10.52%	6.98%	4.30%	3.82%	11.66%
Low Income	51.05%	11.36%	6.64%	6.06%	5.36%	19.52%
Two or More Races	38.44%	16.33%	8.54%	6.03%	6.03%	24.62%
White	51.28%	27.63%	6.42%	3.92%	3.62%	7.13%

**Table 3.** Counts and Percentages of High Schools by Differentiated Scoring Band, Disaggregated by Student Demographic Group

<b>HS Student Groups Count</b>	<b>None</b>	<b>5 Percent</b>	<b>10 Percent</b>	<b>15 Percent</b>	<b>20 Percent</b>	<b>25 Percent</b>
Asian	44	27	5	5		12
Black or African American	70	14	10	12	6	36
CWD	27	23	3	2	8	18
EL	55	18	6	5	5	27
Former EL	61	39	11	6	2	20
Hispanic or Latino	102	27	17	10	7	28
Low Income	195	58	31	24	18	69
Two or More Races	65	33	5	1	10	33
White	185	104	27	18	11	40
<b>HS Student Groups Percent</b>	<b>None</b>	<b>5 Percent</b>	<b>10 Percent</b>	<b>15 Percent</b>	<b>20 Percent</b>	<b>25 Percent</b>
Asian	47.31%	29.03%	5.38%	5.38%	0.00%	12.90%
Black or African American	47.30%	9.46%	6.76%	8.11%	4.05%	24.32%
CWD	33.33%	28.40%	3.70%	2.47%	9.88%	22.22%
EL	47.41%	15.52%	5.17%	4.31%	4.31%	23.28%
Former EL	43.88%	28.06%	7.91%	4.32%	1.44%	14.39%
Hispanic or Latino	53.40%	14.14%	8.90%	5.24%	3.66%	14.66%

Low Income	49.37%	14.68%	7.85%	6.08%	4.56%	17.47%
Two or More Races	44.22%	22.45%	3.40%	0.68%	6.80%	22.45%
White	48.05%	27.01%	7.01%	4.68%	2.86%	10.39%

The charts below illustrate the different schools and student groups within schools potentially earning points in each differentiated scoring band. To determine if the scoring bands meaningfully differentiate the performance of schools in Illinois on this indicator, the following criteria were used:

- Are at least 35 percent of schools earning points in the weighted bands? If yes, this approach meaningfully contributes to differentiation.
- Are the percentages of schools potentially earning points in each band similar across groups, or are there outliers (i.e., types or groups for which the shape of the line is different)? Outliers would suggest the bands were not reasonable for all student groups.

**Chart 2.** Percent of Schools Earning Bonus Points by Differentiated Scoring Band

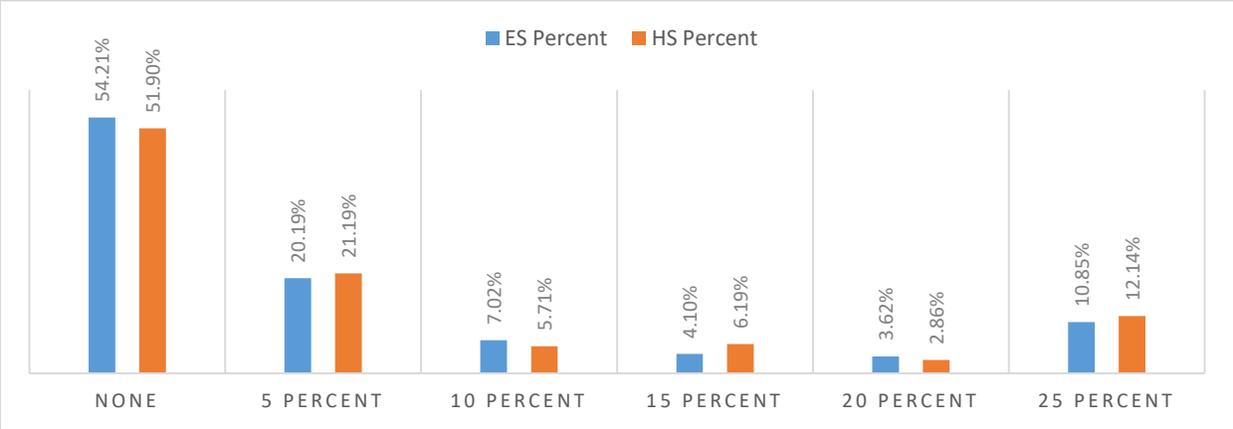
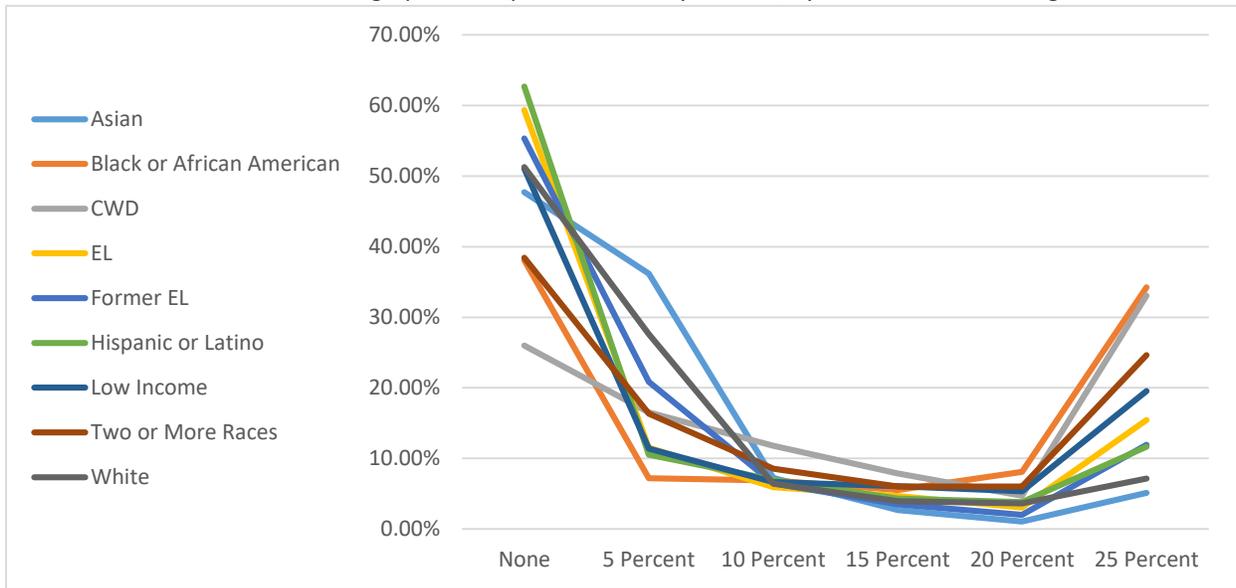


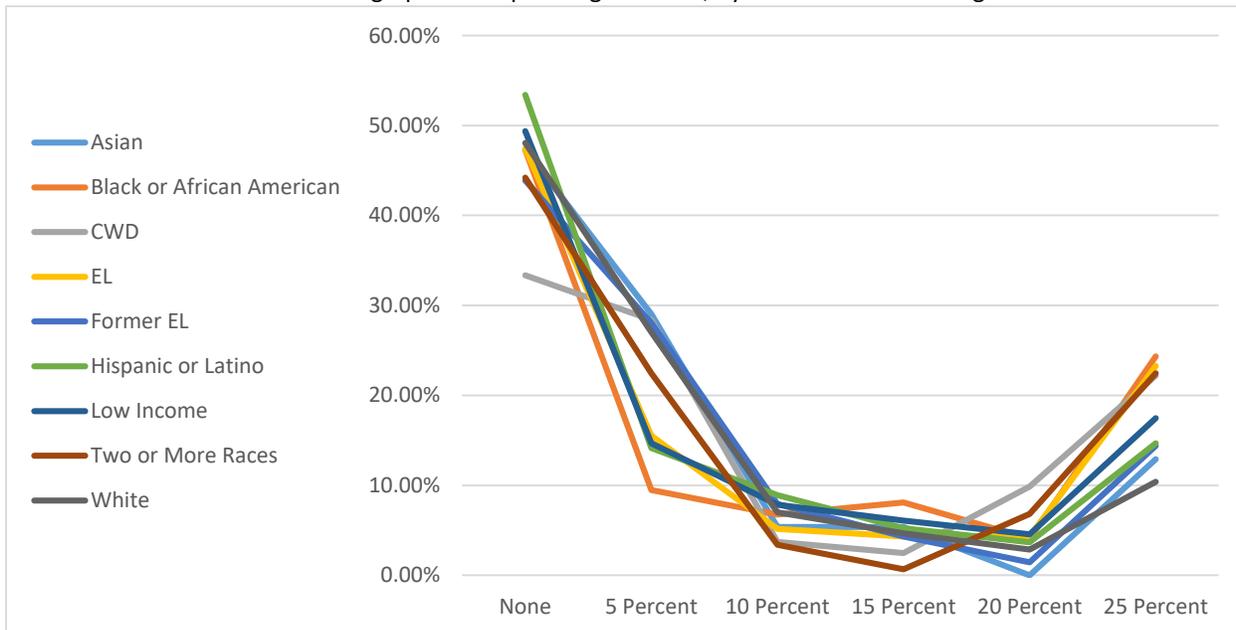
Chart 2 illustrates that at least 45 percent of elementary schools and 48 percent of high schools would fall in the weighted scoring bands. Additionally, the percentages in each category are similar to each other, meaning that the proposed bands contribute meaningfully to differentiation in ways that are consistent across elementary and high schools.

**Chart 3. Percent of Student Demographic Groups in Elementary Schools, by Differentiated Scoring Bands**



Charts 3 and 4 look at the individual student groups within schools (either elementary schools or high schools) to determine if the distribution of schools are similar. While there is a somewhat wider spread in the 5 percent category for elementary schools, this spread does not repeat itself in high school, the distributions are similar and tightly clustered, suggesting performance is similar.

**Chart 4. Percent of Student Demographic Groups in High Schools, by Differentiated Scoring Bands**



**Unchanged Indicators**

Regarding the proposal to leave the High School Graduation Rate, 9<sup>th</sup> Graders On Track, and Climate Survey Participation indicators unchanged, 50 percent supported, 16.7 percent opposed, with 36.1 percent having no opinion (survey respondents, n=42). A majority of webinar participants supported leaving these indicators unchanged, but the degree of support varied by indicator, with 59.1 percent in support of leaving the graduation

rate indicator unchanged, 96.4 percent in support of leaving the climate survey indicator unchanged, and 91.3 percent in support of leaving the 9<sup>th</sup> graders on track indicator unchanged (n=139).

**Response:** ISBE will maintain the proposal to leave these three indicators unchanged. Although support was not as strong for leaving graduation rate unchanged, the data currently do not support or warrant modification.

### **Timeline for Implementation of the Meta-Indicators**

The proposal to delay the implementation of the meta-indicators received strong support (76.2 percent, with 40.6 percent of that being strong support), with 19.4 percent opposed, and two other opinions, both of which advocated delaying longer than 2025 (n=42). This comports with the feedback from webinar participants, 50 percent of whom supported delaying until 2025, 44.4 percent of whom supported delaying until 2026, and only 5.6 percent of whom supported implementation in 2024 (n=139).

**Response:** ISBE will maintain the proposal to implement these indicators in 2025, unless the data validation process suggests that implementation in 2025 cannot be supported, in which case implementation would, of necessity, be delayed until 2026.

### **Summary of Written Comments**

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ISBE received four written letters of comment. The first was from Foresight Law + Policy regarding the P-2 meta-indicator. The second statement was from the Illinois Federation of Teachers-Chicago Teachers Union (IFT CTU), the third was from Advance Illinois, and the fourth from the Illinois Balanced Accountability Measures Committee.

The comments from Foresight Law + Policy advocated a set of potential changes related to how ISBE uses and emphasizes chronic absenteeism in kindergarten through second grade. but the letter proposes three ways ISBE could emphasize the importance of these grades, which are not assessed and have limited presence in any of the indicators other than chronic absenteeism. First, it is suggested to separate K-2 chronic absenteeism from chronic absenteeism in later years, and making it a distinct category in school accountability. Second, he suggests including K-2 as a unique band in the differentiated scoring band approach being considered for chronic absenteeism in SY2021-22. Finally, the letter strongly encourages reporting K-2 chronic absenteeism separately, even if it is not weighed separated in the accountability formula. One of the key benefits of these suggestions is that none of them call for a multi-year validation of a new indicator It is out of the scope of this amendment to contemplate permanent changes to chronic absenteeism at this time. In the future, if such a permanent change is considered, ISBE would model this data and share with the field. Finally, the suggestion about disaggregating chronic absenteeism by grade is an excellent one, which ISBE will work to incorporate into the scope of improvements to the Illinois Report Card.

The letter from IFT CTU urges ISBE to “call for a federal rethinking of accountability as COVID continues to rage in our communities. Feedback from the state’s accountability system influences how school leaders allocate instructional time, energy and limited resources. Given the significant concerns about the data being used to generate this feedback, and the limitations of standardized test scores, it is incumbent on ISBE to take action beyond the current amendment and advocate for changes to federal school accountability policy.” ISBE acknowledges the points the letter makes regarding why issuing summative designations based on data from SY2021-22 is less than optimal, and notes that the letter cites ISBE’s own communications regarding this topic. ISBE remains committed to taking every available flexibility offered by ED with regards to accountability, but must also put forward the most technically sound and contextually responsive plan to meet its obligations under the law.

The comments from Advance Illinois “generally support the direction ISBE is proposing for amendments to the state’s accountability plan,” while offering suggestions or encouraging clarification around four points. Regarding chronic absenteeism, Advance Illinois reiterated its commitment to the inclusion of the indicator and suggested

further enhancing both the indicator and reporting around chronic absenteeism by “disaggregating and weighting P-2 chronic absenteeism in the school designations calculation until a more comprehensive P-2 indicator is included in the system...and... to publicly report specifically on the data for this early grade span separately from the later grades and to commit to do so until a more comprehensive P-2 indicator is finalized.” Advance Illinois’ second point related to the proposal to use science participation in lieu of science proficiency rates. They expressed general support for the proposal given the context but encouraged Illinois to ensure “our students and schools have in place an assessment tool and proficiency metrics that are stable and high quality.” ISBE agrees and believes the proposed 1-year substitution of participation will ensure that ISBE possesses the quality data it needs to produce science reporting that is more informative and actionable for schools and districts. The third point sought confirmation that the proposed use of differentiated scoring bands and early exit opportunities were limited exclusively to SY2021-22, which ISBE can confirm. Finally, Advance Illinois also sought to understand why ISBE removed references to the goal of having sixty percent of graduates having an advanced degree or certificate by 2025.

The letter from the Illinois Balanced Accountability Measures Committee also expresses support for the changes proposed by ISBE. In particular, they note that the proposed changes “provide some relief and needed flexibility to schools.” The committee also felt that the proposed chronic absenteeism changes “addresses the flexibility schools need during this time to connect with families about the importance of school attendance while also balancing the responsibility schools hold to maintain a safe and healthy environment for students and staff while they continue to respond to an ever-changing, highly contagious virus.” The committee further recommends that ISBE contextualize all communications and reporting in ways that “...[denotes] the impact of COVID-19 on learning conditions resulting in widely inconsistent student performance as measured by existing indicators.” ISBE appreciates and agrees with this recommendation.

## Comments from the Survey

Question: Do you have any comments or suggestions regarding the proposed accountability system changes?		
From/Representing	Summary	Response
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Suggests holding schools accountable for compliance to various regulations or rules, specifically around the special education process.</li> <li>Suggests allowing various tracks for high school students.</li> </ul>	<ul style="list-style-type: none"> <li>These suggestions were shared with the relevant ISBE departments regarding their day to day operations, but they do not meet the criteria for inclusion as ESSA accountability indicators. They cannot be attributed to and disaggregated by individual student.</li> <li>No changes to the amendment will be made.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>Feels there is too much weight on testing and other quantitative measures of student performance.</li> <li>Feels standardized testing does not capture the performance of students with disabilities well.</li> <li>Feels school accountability is appropriate, but that high expectations are not developmentally appropriate when social emotional learning needs of students are not met.</li> </ul>	<ul style="list-style-type: none"> <li>Statewide standardized assessment to measure student achievement in ELA and math are requirements of ESSA.</li> <li>Additionally, states are required to hold ambitious but achievable goals for all students, and they must be the same goals for all students.</li> <li>No changes will be made to the amendment.</li> </ul>
Jikorte; Parent or guardian	<ul style="list-style-type: none"> <li>Feels that the change of targets for students remaining in effect until SY2032-33 is too far out, does not provide information to parents on the impact of the pandemic.</li> </ul>	<ul style="list-style-type: none"> <li>This comment appears to be related to the need for actionable reporting and information for parents.</li> <li>No changes will be made to the amendment.</li> </ul>
Tlchrd; Parent or guardian	<ul style="list-style-type: none"> <li>Opposes testing of students</li> </ul>	<ul style="list-style-type: none"> <li>Statewide standardized assessment to measure student achievement in ELA and math are requirements of ESSA.</li> <li>No changes will be made to the amendment.</li> </ul>
mamma7526; Parent or guardian	<ul style="list-style-type: none"> <li>Feels the proposed changes are insufficient, and that many school districts did nothing or only the bare minimum in 2020 to help students learn.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees that careful attention to the progress of students who experienced significant periods of remote instruction in SY2020-21 is necessary to ensure that students remain on track to graduate ready for college or a career.</li> <li>No changes will be made to the amendment.</li> </ul>
J Gillihan; Parent or guardian	<ul style="list-style-type: none"> <li>Opposes rewarding attendance as an indicator of proficiency.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees that under normal circumstances, participation should not be used as a proxy for learning or proficiency. However, in light of the technical limitations associated with the science assessment data, the proposal to replace, for one year only, science proficiency rates with participation rates remains a sound option for incentivizing high levels of participation on the administration of the assessment that will be used for standard setting.</li> </ul>

		<ul style="list-style-type: none"> <li>No changes will be made to the amendment.</li> </ul>
Jaimie Abney; District administrator, Teacher, Community member	<ul style="list-style-type: none"> <li>Opposes delaying the fine arts indicator, given the importance of the arts and the fact that they are not otherwise required or measured.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees that the fine arts remain an important part of a well-rounded education and remains committed to the inclusion of this indicator after a full 3-year validation process. Given the technical considerations associated with meta-indicators, this remains necessary and appropriate. The delay to 2025 remains the earliest ISBE feels a successful validation can be achieved.</li> <li>No changes will be made to the amendment.</li> </ul>
M Zwerling, Teacher, Waukegan Community Unit School District # 60,	<ul style="list-style-type: none"> <li>Suggests switching from IAR to NWEA for the stat assessment and then incorporating a fall to spring student growth model in addition to a year to year growth model.</li> </ul>	<ul style="list-style-type: none"> <li>This comment was shared with the Assessment department for their consideration, but changes to the assessments are not a part of this amendment.</li> <li>No changes will be made to the amendment.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>Feels the entire system needs to be redesigned, and advocates for saturating poor districts with resources in order to meet state standards.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees that policies that drive resources to the most under resourced communities first are critical to address decades of systemic funding inequities. The accountability system also uses Evidence Based Funding calculations of percentage of adequacy to drive more resources to poorer districts who are identified for academic supports.</li> <li>No changes will be made to the amendment.</li> </ul>
jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>Opposes the amount of testing and feels it is a waste of instructional time. Supports a fall to spring growth model.</li> </ul>	<ul style="list-style-type: none"> <li>This comment was shared with the Assessment department for their consideration, but changes to the assessments are not a part of this amendment.</li> <li>No changes will be made to the amendment.</li> </ul>
Candygirl_cjm, Parent or guardian	<ul style="list-style-type: none"> <li>Opposes tying attendance to school assessments because it causes illnesses during cold and flu season and hurts children with mental health issues.</li> </ul>	<ul style="list-style-type: none"> <li>ESSA requires all schools to assess at minimum, 95 percent of students and student demographic groups, and requires states to calculate proficiency rates out of the greater of the number of students who tested or 95 percent of those who should have.</li> <li>No changes will be made to the amendment.</li> </ul>
T Portz; School administrator, Ramsey Community Unit School District #204	<ul style="list-style-type: none"> <li>Suggests further consideration of the chronic absenteeism indicator, given the perception that rates of attendance are lower in SY2021-22 than in SY2020-21.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees, close attention to the chronic absenteeism indicator over the next year is necessary, and future revisions may be warranted. An analysis of the first semester of SY2021-22 attendance data suggests that currently, approximately half of schools would fall into one of the weighted differentiated scoring bands, so while attendance may be an issue in the local context, it does not appear to be so universally.</li> <li>No changes will be made to the amendment at this time.</li> </ul>
H Harris; Teacher, District staff, Ramsey Community Unit School District #204	<ul style="list-style-type: none"> <li>Has concerns about the impact of differential attendance statewide on variety of indicators.</li> <li></li> <li>Suggests further consideration of the chronic absenteeism indicator, given the</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees, close attention to both the impact of attendance on student achievement generally and the chronic absenteeism indicator specifically over the next year is necessary, and future revisions may be warranted. An analysis of the first semester of SY2021-22 attendance data suggests that currently, approximately half of schools would fall into one of the weighted differentiated scoring bands.</li> </ul>

	perception that rates of attendance are lower in SY2021-22 than in SY2020-21	<ul style="list-style-type: none"> <li>No changes will be made to the amendment at this time.</li> </ul>
Ben Ditkowsky, District Administrator, Barrington Community Unit School District 22	<ul style="list-style-type: none"> <li>Suggests that ISBE focus on highest priorities over things that might be nice to have, and emphasizes the need for information from ISBE to be trustworthy, usable and accessible.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE agrees with the commenter and will work with stakeholder groups to field test communications and other resources to promote understanding and use of the 2022 accountability information.</li> <li>No changes will be made to the amendment.</li> </ul>
<b>Question: Do you have any comments or suggestions regarding the proposed changes related to English Learners?</b>		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
J Nichols, District administrator, Orland School District 135	<ul style="list-style-type: none"> <li>Opposes adding the new Spanish Language Arts standards on the grounds that there are many other languages spoken in IL and IL schools.</li> </ul>	<ul style="list-style-type: none"> <li>Spanish is the language that is spoken by the largest population of English Learners (72% of ELs in SY 2020) in Illinois. Spanish Language Arts standards are the first step to ensuring that students in bilingual programs have equitable access to rigorous, high-quality, native language instruction.</li> <li>No changes will be made to the amendment.</li> </ul>
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Supports the inclusion of the Spanish Language Arts standards.</li> <li>Advocates for options for students other than college-bound.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
M Zwerling, Teacher, Waukegan Community Unit School District # 60,	<ul style="list-style-type: none"> <li>Recommends considering cessation of ACCESS for students with IEPs who have not managed to test out after six years and using ACCESS scores as a measure when determining designations for districts with a minimum number of test takers.</li> </ul>	<ul style="list-style-type: none"> <li>The federal government requires that all identified English Learners, including English Learners with IEPs, be tested annually until they demonstrate a certain level of English language proficiency. ACCESS scores are currently used to calculate English Learner Progress to Proficiency scores. These scores part of the calculations for designations.</li> <li>No changes will be made to the amendment.</li> </ul>
Wygeniab, Community member	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>Suggests a shift toward a dual language setting for all students, with dual language required in communities where 1/3 or more is the population is Spanish speaking.</li> </ul>	<ul style="list-style-type: none"> <li>. School districts in Illinois have the autonomy to choose which kind of programming makes the most sense for their communities.</li> <li>No changes will be made to the amendment.</li> </ul>
Robinsonwd2, Community member	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Emdeinie, Parent or guardian	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Ben Ditkowsky, District Administrator, Barrington Community Unit School District 22	<ul style="list-style-type: none"> <li>Questions whether ISBE's goals are consistent with what the population of the state wants or based on the desire of a small group of vocal advocates?</li> </ul>	<ul style="list-style-type: none"> <li>ISBE values the opinions of all its stakeholders (e.g., families and community members, educators, administrators, staff, policy and other advocacy groups, legislators, business leaders, etc.). Each brings a unique lens to the work and what is best for students.</li> <li>No changes will be made to the amendment.</li> </ul>
Dawn Barrett, District administrator, Cary School District 26	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Linda Matkowski, District administrator, Champaign Unit 4 School District	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>

<b>Question: Do you have any comments or suggestions regarding the proposed changes related to Title I or Title IV?</b>		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>Expresses concern over the quality of the Title I programming in her district.</li> <li>Suggests improving learning to multi-sensory learning and continuing education for educators for what multi-sensory learning to support children with disabilities.</li> <li>Suggests improving the usage of funds spent on Title I and increasing the accountability of all school districts of how the funds are spent to improve the education of those in Title I programs.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE appreciates the comment regarding Title I, and remains committed to supporting district Title I programs which may include but are not limited to multi-sensory learning and continuing education for educators.</li> <li>Eligible Title I districts submit their Title I grant applications to ISBE for review and approval. This grant application contains use of funds to meet the intent of the Every Students Succeeds Act (ESSA). The Act includes accountability measures to improve the education outcomes.</li> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>Suggests that funds should be increased and used for research proven methods (not research based).</li> </ul>	<ul style="list-style-type: none"> <li>Title I, Part A are federal funds allocated through four statutory formulas based primarily on census poverty estimates. The funds are allocated to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.</li> <li>According to Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Learning, ED focuses on activities, strategies, and interventions that are research based.</li> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>Notes that it is not very clear what changes are being made.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE understands it can be challenging in a large document to track the scope and nature of the changes. It produced a page-by-page listing of the changes and their rationale to assist readers and questions could and can still be submitted to <a href="mailto:essa@isbe.net">essa@isbe.net</a>.</li> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Robinsonwd2, Community member	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Emdeinie, Parent or guardian	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Dawn Barrett, District administrator, Cary School District 26	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Linda Matkowski, District administrator, Champaign Unit 4 School District	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
<b>Question: Do you have any comments or suggestions regarding the proposed changes removing references to dates that have passed and fixing broken links, updating references to the Illinois Virtual School with Illinois Virtual Course Catalog, and including a link to the Culturally Responsive Teaching and Leading Standards?</b>		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
J Nichols, District administrator, Orland School District 135	<ul style="list-style-type: none"> <li>Suggests that before adding information on the Culturally Responsive Teacher Standards, ISBE needs to provide a more in-</li> </ul>	<ul style="list-style-type: none"> <li>The Culturally Responsive Teaching and Leading Standards were adopted in March 2021 and will be implemented in educator preparation programs, helping aspiring educators build the skills</li> </ul>

	<p>depth overview of the standards, resources, and supports for school districts. This can be done with a series of webinars.</p>	<p>they need to engage students who may come from different backgrounds and cultures. ISBE is not requiring school districts to train currently employed teachers on the standards, however, ISBE does encourage professional development on the standards, and professional development resources can be found online <a href="#">here</a>.</p> <ul style="list-style-type: none"> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>• Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE will maintain its proposed changes.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>• Suggests improving the requirements for school districts to show the curriculum and testing they are using for students and that it is helping the whole student.</li> </ul>	<ul style="list-style-type: none"> <li>• Curriculum decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators. Regional Offices of Education ensure compliance with state mandates for courses and units of study by K-12 students during annual monitoring visits.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Jikorte; Parent or guardian	<ul style="list-style-type: none"> <li>• Suggests that ISBE should not be teaching critical race theory in our schools and requests that we stop masking our students.</li> </ul>	<ul style="list-style-type: none"> <li>• Critical Race Theory (CRT) is not mandated to be taught by ISBE. Curriculum decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
J Gillihan; Parent or guardian	<ul style="list-style-type: none"> <li>• Opposes adding a link for the culturally responsive teaching and leading standards.</li> </ul>	<ul style="list-style-type: none"> <li>• The Culturally Responsive Teaching and Leading Standards were adopted in March 2021 and will be implemented by educator preparation programs, therefore, providing a link to the approved standards is necessary.</li> <li>• ISBE will maintain its proposed changes.</li> </ul>
Tiffany Kohl, District Administrator, Bradley-Bourbonnais Community High School District 307	<ul style="list-style-type: none"> <li>• Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE will maintain its proposed changes.</li> </ul>
Christy Semande, Association of Illinois School Library Educators, Education or policy group member or advocate	<ul style="list-style-type: none"> <li>• Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE will maintain its proposed changes.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>• Requests greater oversight from ISBE regarding the content of textbooks, as many currently disincentivize Black, Indigenous and People of Color teachers.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE does not endorse curriculum or textbooks. Curriculum decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>• Expresses concern that the state is getting heavy handed with teachers and that laws making it harder to suspend problematic</li> </ul>	<ul style="list-style-type: none"> <li>• The Culturally Responsive Teaching and Leading standards apply to teacher preparation programs, not to in-service educators or the K-12 curriculum. The standards were adopted in March 2021 to encourage teachers to engage in self-reflection, get to know</li> </ul>

	students has greatly impacted classroom environments.	students' families, and connect the curriculum to students' lives, all of which are likely to contribute to reductions in problematic behavior and improved learning. They are not used for suspension of students or for any disciplinary situations. <ul style="list-style-type: none"> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Dawn Barrett, District administrator, Cary School District 26	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Linda Matkowski, District administrator, Champaign Unit 4 School District	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
<p><b>Question:</b> Do you have any comments or suggestions regarding updating the name of the Grades 3-8 assessment from the Partnership for Assessment of Readiness for College and Careers to the Illinois Assessment of Readiness, removing references to dates that have passed and fixing broken links, or removing references to the Ed360 system and the data visualization section and updating with a link to <a href="http://www.illinoisreportcard.com">www.illinoisreportcard.com</a>?</p>		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>Encourages ISBE to create less stress for students in regards to the Assessment, ensure that the school notify parents that the assessment can be declined.</li> </ul>	<ul style="list-style-type: none"> <li>This comment was shared with the Assessment department for their consideration, but assessment administration policies are not a part of this amendment.</li> <li>No changes will be made to the amendment.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>Notes that more links do not make the data easier to consume.</li> <li>Suggests keeping the information on one page, including the data visualization.</li> <li>Supports updating the name.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE appreciates the suggestions regarding data visualizations and the utility of links.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
Jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>Questions whether the proposed data visualizations will be on the report card and whether the intent is to shield data from the public with a more generalized report card?</li> </ul>	<ul style="list-style-type: none"> <li>ISBE's intent in deleting the original data visualization description was to remove the use of color levels, a decision not consistent with our current nationally recognized interactive report card design and to remove the hypothetical grade band illustration, which is not consistent with how the data is actually aggregated and calculated. ISBE has several expansions of the data visualizations associated with summative designations planned for future years when calculations resume.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
M Zwerling, Teacher, Waukegan Community Unit School District # 60,	<ul style="list-style-type: none"> <li>Feels a new acronym for the test is unnecessary.</li> </ul>	<ul style="list-style-type: none"> <li>Updating the plan to reflect current practice is necessary.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
Emdeinie, Parent or guardian	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Ben Ditkowsky, District Administrator, Barrington Community Unit School District 22	<ul style="list-style-type: none"> <li>Reiterates ISBE should be a trusted source of information</li> </ul>	<ul style="list-style-type: none"> <li>ISBE appreciates the comment and believes updating the plan to reflect current practice is part of being a trustworthy source of information.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
Dawn Barrett, District administrator, Cary School District 26	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>

Linda Matkowski, District administrator, Champaign Unit 4 School District	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
<b>Question:</b> Do you have any comments or suggestions regarding updating the description of the State Education Agency's provision of technical assistance via the learning partner selection process, clarifying how the school-level needs assessment will be conducted in the planning and implementation phases of the grant, or clarifying how ISBE will support Local Education Agencies with schools in comprehensive and targeted status?		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
Renee James; Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Suggests transparency.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE appreciates the comment regarding transparency and remains committed to best practices in accountability and continuous improvement.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>Suggests that ISBE holds all schools accountable for supporting the students as the school districts have the children for the majority of the daytime.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE appreciates the comment regarding schools supporting all students and believes the current accountability system places a strong emphasis on even small groups of students within schools.</li> <li>ISBE will maintain its proposed changes.</li> </ul>
Jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>Notes that it is not very clear what changes are being made.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE understands it can be challenging in a large document to track the scope and nature of the changes. It produced a page-by-page listing of the changes and their rationale to assist readers and questions could and can still be submitted to <a href="mailto:essa@isbe.net">essa@isbe.net</a>.</li> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Robinsonwd2, Community member	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Emdeinie, Parent or guardian	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Candygirl_cjm, Parent or guardian	<ul style="list-style-type: none"> <li>Requests that ISBE get rid of Savas Realize.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE does not endorse curriculum or textbooks. Curriculum decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators.</li> <li>No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Dawn Barrett, District administrator, Cary School District 26	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
Linda Matkowski, District administrator, Champaign Unit 4 School District	<ul style="list-style-type: none"> <li>Supports the proposed changes.</li> </ul>	<ul style="list-style-type: none"> <li>ISBE will maintain its proposed changes.</li> </ul>
<b>Question:</b> Do you have any other comments or suggestions?		
<b>From/Representing</b>	<b>Summary</b>	<b>Response</b>
Ann Whalen, Advance Illinois, Education or policy group member or advocate	<ul style="list-style-type: none"> <li>Questions the rationale for removing all references to 60 x 25 goal.</li> </ul>	<ul style="list-style-type: none"> <li>Illinois maintains its broad commitment to the 60 x 2025 goal, however, the current Board has identified a specific set of priorities to guide the work of the agency and measures of progress and success for those priorities.</li> </ul>
Misti Bluhm; Parent or guardian	<ul style="list-style-type: none"> <li>Advocates for social emotional learning that is developmentally appropriate for students, that small school districts are accountable</li> </ul>	<ul style="list-style-type: none"> <li>Curriculum and other programming decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators. Regional Offices of Education ensure compliance with state mandates for</li> </ul>

	<p>for the mandates, guidelines, law, and Public Acts.</p> <ul style="list-style-type: none"> <li>• Also advocates for a shorter school day with longer play time and meal times.</li> </ul>	<p>courses and units of study by K-12 students during annual monitoring visits.</p> <ul style="list-style-type: none"> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Jikorte; Parent or guardian	<ul style="list-style-type: none"> <li>• Advocates that schools should decide what they teach with minimal guidance from ISBE.</li> <li>• Suggests ISBE stop masking kids.</li> </ul>	<ul style="list-style-type: none"> <li>• Curriculum and other programming decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators. No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Tlchrd; Parent or guardian	<ul style="list-style-type: none"> <li>• Advocates eliminating standardized testing.</li> </ul>	<ul style="list-style-type: none"> <li>• Statewide standardized assessment to measure student achievement in ELA and math are requirements of ESSA.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
J Gillihan; Parent or guardian	<ul style="list-style-type: none"> <li>• Suggests that elevating kids to levels of accomplishment that they do not possess will degrade society.</li> </ul>	<ul style="list-style-type: none"> <li>• States are required to hold ambitious but achievable goals for all students, and they must be the same goals for all students.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Jaimie Abney; District administrator, Teacher, Community member	<ul style="list-style-type: none"> <li>• Reiterates advocacy for the fine arts indicator.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE agrees that the fine arts remain an important part of a well-rounded education and remains committed to the inclusion of this indicator after a full 3-year validation process. Given the technical considerations associated with meta-indicators, this remains necessary and appropriate. The delay to 2025 remains the earliest ISBE feels a successful validation can be achieved.</li> <li>• No changes will be made to the amendment.</li> </ul>
M Zwerling, Teacher, Waukegan Community Unit School District # 60,	<ul style="list-style-type: none"> <li>• States that assessments need to provide usable data, and that IAR results are not returned in time fast enough for schools to change the instruction or make a difference for the kids who took those tests.</li> <li>• Advocates switching to NWEA</li> </ul>	<ul style="list-style-type: none"> <li>• This comment was shared with the Assessment department for their consideration, but changes to the assessments are not a part of this amendment.</li> <li>• No changes will be made to the amendment.</li> </ul>
Cawlensing, Parent or guardian	<ul style="list-style-type: none"> <li>• Reiterates advocacy for historically accurate textbooks and additional funding for under resourced districts.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE does not endorse curriculum or textbooks. Curriculum decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
jeffmc60450, Teacher	<ul style="list-style-type: none"> <li>• Expresses frustration that the topics being discussed in the survey were not more familiar to the general public.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE acknowledges that federal law and accountability can be rather opaque topics, and will continue to look for additional ways to engage stakeholders more deeply in the work.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Candygirl_cjm, Parent or guardian	<ul style="list-style-type: none"> <li>• Suggests providing remote learning for children with long term illnesses including mental health issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Districts can develop an e-learning plan, but the creation of such plans are part of local control with local boards of education</li> </ul>

		<p>approving programming decisions in collaboration with district educators and administrators.</p> <ul style="list-style-type: none"> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
C Bahnks, School administrator,	<ul style="list-style-type: none"> <li>• Believes that moving towards a yearlong growth model is a far better indicator than having a year-end assessment. Year-end assessments offer little help to schools since the data is shared so slowly.</li> </ul>	<ul style="list-style-type: none"> <li>• This comment was shared with the Assessment department for their consideration, but changes to the assessments are not a part of this amendment.</li> <li>• No changes will be made to the amendment.</li> </ul>
Ben Ditkowsky, District Administrator, Barrington Community Unit School District 22	<ul style="list-style-type: none"> <li>• Appreciates the work the state is doing to improve its systems, and suggests that ISBE should focus on doing only that which is required well.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE appreciates the comment and remains committed to best practices in accountability and school improvement.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>
Bw1alker, Parent or guardian	<ul style="list-style-type: none"> <li>• Suggests that teachers need to teach. Believes too many teachers are focused on social issues outside of the classroom.</li> <li>• Advocates teaching reading, writing, math, and avoiding subjects that contribute to the formation of personal opinions.</li> </ul>	<ul style="list-style-type: none"> <li>• ISBE determines the Illinois Learning Standards, however curriculum and other programming decisions are part of local control with local boards of education approving curriculum in collaboration with district educators and administrators.</li> <li>• No action to the ESSA State Plan is needed in response to this comment.</li> </ul>