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120 of variations of the following submissions:

Hello,

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First Name: Imani

Last Name: Harris

Email: imaniharris590@gmail.com

Comments: Include the Arts for ESSA

Thank you.

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Last Name: Diaz

Email: Ldiaz31@cps.edu

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First Name: David

Last Name: Tournoux

Email: david.tournoux@gmail.com

Thank you.

Hello,

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First Name: Delwin

Last Name: Roland

Email: DMRoland@cps.edu

Comments: a "well-rounded" education should include the ARTS. Illinois' accountability system should include ARTS as a distinct indicator of school quality.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Tiffany

Last Name: Godines

Email: tgodines@cps.edu

Comments: Please Include The Arts.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Renae

Last Name: Stone

Email: rwstone1@cps.edu

Comments: I would like to respectfully remind you that a well-rounded education includes the arts. I am currently a theatre teacher in a high school IB programme and am proud that our curriculum places the arts on the same level of importance as core subjects; therefore, teaching the whole child. Please allow this opportunity for all of our Illinois students.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Pershing

Last Name: Anderson

Email: apershing@hotmail.com

Comments: Simply put: The Arts are a vital part of education and should be supported as an active and vital part of the educational process.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Madilyn

Last Name: Strentz

Email: masoch@cps.edu

Comments: The state of Illinois should include, and value, arts education in our ESSA plan! A well-rounded school that offers holistic, rigorous education is one that includes the arts! Ideally a school has more than one type of art discipline, such as both visual arts and music. Studies have shown that arts education boosts enrollment, student engagement, and student attainment in other subject areas such as math and reading.

Thank you.

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First Name: Dayjahna'e

Last Name: Weston

Email: dweston1@cpa.edu

Comments: Please include the arts.

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First Name: mary

Last Name: rossi

Email: mtrossi@cps.edu

Comments: Every student is entitled to the broadest education possible to achieve democratic philosophy which unquestionably is grounded in the Fine Arts. Fine Arts promote tolerance and expand the the appreciation for variety, diversity and willingness to explore and consider opposing ideas.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Susan

Last Name: Dickson

Email: sldickson@earthlink.net

Comments: Illinois' accountability system should include ARTS as a distinct indicator of school quality!

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Last Name: Schmittle

Email: cate.schmittle@gmail.com

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An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Christa

Last Name: Garcia

Email: cengel1966@sbcglobal.net

Comments: Art is as important as academics and sports. It inspires productivity, creative learning, discipline, and drive to completion.

Quality Arts = Quality school. Balance.

Thank you.

ARTS

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Melinda

Last Name: Wilson

Email: MAWilson1@cps.edu

Comments: ESSA - Illinois accountability system needs to include the arts as a distinct indicator of school quality.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Ted

Last Name: Ehnle

Email: twehnle1@cps.edu

Comments: A "well-rounded" student is one who participates in the ARTS. Illinois' accountability system should include ARTS as a distinct indicator of school quality.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Naeema

Last Name: Spencer

Email: Naeema456@gmail.com

Comments: Please include the arts. PLEASE THE ARTS IN ESSA.

Thank you.

To whom it may concern,

The organization that I work for is the network for 31 Chicago Public Schools.

Arts Education is an imperative outlet for under served communities.

Please insert an accountability system that includes the arts as a distinct indicator of school quality.

Kind Regards,

Heather J. Davis, Manager of Curricular Enhancements

Academy for Urban School Leadership

3400 N. Austin Ave | Chicago, IL 60634

O: 773.534.0948 | E: hdavis@auslchicago.org

auslchicago.org | [Facebook.com/AUSLChicago](https://www.facebook.com/AUSLChicago) | [@AUSLChicago](https://www.instagram.com/AUSLChicago)

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Elizabeth

Last Name: Drake

ARTS

Email: eadrake@cps.edu

Comments: I am a CPS Visual Art Teacher, and EVERY child in the state deserves a "well-rounded" education that includes exposure to all arts disciplines by way of licensed arts educators!

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: J.

Last Name: Jenkins

Email: jenaijenkins@gmail.com

Comments: Please include ARTS as a distinct indicator of school quality in the ARTS! Illinois' accountability system.

Thank you.

Dear Illinois State Board of Education,

I am writing to express my investment and interest in arts education in the state of Illinois. I would like to see the new law ensure that ALL students in Illinois have WEEKLY arts classes.

The arts are a crucial part of a "well-rounded education," which US Department of Education Secretary John King says all students should have access to, and so providing a well-rounded education is a CIVIL RIGHTS issue. I can speak on behalf of my personal experience as a young African-American woman, and the students I work with in Chicago Public Schools. The arts matter. Arts education matters immensely to a future that will require creative collaboration. As a recent college graduate, I also ask you to include the arts in your consideration of what makes students College & Career Ready. The arts truly prepare students for success in college and are particularly effective at closing the achievement gap.

Thank you for your time.

Happy Holidays,

Savannah

Savannah Turner
School & Community Programs Coordinator
Hubbard Street Dance Chicago
312-850-9744 ext. 173
sturner@hubbardstreetdance.com

"Hard times require furious dancing." –Alice Walker

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Sarah

Last Name: Mostad

Email: slmostad@cps.edu

Comments: Good morning. I am a Theatre teacher in Chicago Public Schools. I have also taught English, History, Class Piano, Study Skills, and Class Piano. In my thirteen years in the classroom, I have witnessed hundreds of students for whom the arts gave them identity; their involvement in the arts has been, for many, their lifeline. I just wanted to drop a line that access to the arts at every stage of our students' educations is vitally important to their development as well-rounded individuals, and I strongly encourage that all students both continue to this important access and in many cases, that access is expanded.

Thank you for your time,

Sarah Mostad
Theatre Teacher
Wendell Phillips High School, CPS
Advanced Arts Program at Gallery 37 through CPS

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: ALYSSA

Last Name: BELL

Email: alyssabell911@gmail.com

Comments: I strongly feel that our kids need expression. We need to make sure our kids can express themselves and grow into adults that can do so. We need the arts. All of us. Where would our lives be without it? In school, I don't remember my math teachers powerful and moving equation, or my computer science class creating master pieces. I do in dance. I do in performing and find arts. Imagination comes to life and these young adults can do what they are born to do. Create. These are the stepping stones they need to create a better tomorrow. They themselves will take it with them forever. I have and so do all the people I graduated will to this day. I wouldn't be who I am I'd it weren't for performing arts and dance. I was truly able to fly.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Marnice

Last Name: Lewis

Email: marnice.lewis@gmail.com

Comments: ESSA should include the ARTS as a distinct indicator of school quality. The arts are a critical part of developing well-rounded, cultured, and knowledgeable students.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Jim

Last Name: Wilson

Email: wilsonff@live.com

Comments: Include dance art and theater please. These are all important to success.

Thank you.

COLLEGE AND CAREER

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward. I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

--

Dr. Nancy Wagner
Superintendent
Beach Park School District 3
847.599.5070

Hello, Here are a couple points that I feel are very important to our students success in education.

1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing." By including the AND instead of the OR, it goes against the recommendations set forth by [Redefining Ready](#) and creates an unrealistic metric. We do not fear accountability but advocate for realistic and rigorous metrics. Redefining Ready has set forth a realistic and rigorous framework.
2. For the accountability assessment, those districts utilizing a standards aligned and nationally normed assessment (such as MAP) should be able to use that assessment instead of PARCC. This will allow for increased instruction time while still providing a normative assessment as part of a balanced assessment system.

Thank you for your time.

Heather Beck
General Music Instructor
John Deere Middle School
(309) 743-8685
hbeck@molineschools.org

-
1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing." By including the AND instead of the OR, it goes against the recommendations set forth by [Redefining Ready](#) and creates an unrealistic metric. We do not fear accountability but advocate for realistic and rigorous metrics. Redefining Ready has set forth a realistic and rigorous framework.

2. For the accountability assessment, those districts utilizing a standards aligned and nationally normed assessment (such as MAP) should be able to use that assessment instead of PARCC. This will allow for increased instruction time while still providing a normative assessment as part of a balanced assessment system.

Thank you!

Mrs. Annette Epperly
8-GOLD Pre-Algebra/Algebra

My concern is that we are looking to use A.P. classes as a criteria for college readiness. In rural school districts, the ability to offer such classes has been limited due to faculty cuts due to decrease funding from the state level. This correspondence is not to complain about funding, but to point out that allowing A.P. classes to be used puts rural community schools in a disadvantage.

Is there a way around using the A.P. classes in this metric? A solution could be to allow rural community school districts the opportunity to have these classes online through a virtual school. These rural schools would have to pay for the class. I believe the pay should be discounted due to the burden that A.P. classes would place on districts otherwise.

Joe Sornberger
Superintendent
ROWVA CUSD #208
309-483-3711

1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing."

2. PARCC should NOT be the accounted for state assessment. We need an assessment allowing for aligned standards that is normative and balanced such as MAP.

Ms. Brandi Neer
7 Blue ELA~Reading Specialist
John Deere Middle School

Dear Members of the Illinois State Board of Education:

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is

defined in a multitude of ways. The State of Illinois is leading the conversation in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Sincerely,

Catherine

Catherine M. Finger, Ed.D

Superintendent of Schools
Grayslake Community High School District 127
400 North Lake Street
Grayslake, Illinois 60030
847-986-3441

"Every Student, Every Day"

To: Illinois State Board of Education

From: Kyle W. Freeman, Ph.D.

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Kyle W. Freeman, Ph.D.

Superintendent of Schools
Washington CHSD #308
(309) 444-3167

-
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by [Redefining Ready](#) and creates an unrealistic metric. We do not fear accountability but advocate for realistic and rigorous metrics. Redefining Ready has set forth a realistic and rigorous framework.

2. For the accountability assessment, those districts utilizing a standards aligned and nationally normed assessment (such as MAP) should be able to use that assessment instead of PARCC. This will allow for increased instruction time while still providing a normative assessment as part of a balanced assessment system.

Sincerely,

Kristen Young
NBCT English Language Arts
John Deere Middle School
309.743.8673

To: *Illinois State Board of Education*

From: *Dr. Melissa Kaczowski, Superintendent, Roselle School D12*

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

*In addition, there is a group of dedicated superintendents in DuPage County that are also working on a similar framework for K-8. I absolutely support the adoption of a framework **that is directly taken from research for K-12 in Illinois!** It is time that Illinois sets the standard for making well-informed, research-anchored decisions regarding education. I am not aware of another profession that has policy and rules/regulations set for them by those who are not specialists in the field. It is time that we acknowledge and honor the science that supports best practices for teaching, learning and assessment and allow the science and research to drive our decisions!*

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Respectfully,
Dr. Melissa Kaczowski

To: *Illinois State Board of Education*

COLLEGE AND CAREER

From: Jeremy Darnell

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

--

Jeremy Darnell
GCMS Superintendent of Schools
307 N. Sangamon Ave.
Gibson City, IL 60936
(217)784-8296
darnell.jeremy@gcmsk12.org

GROWTH

This is the most current analysis I've seen of different growth metrics for accountability. Please avoid median growth Percentiles despite their popularity. The mean (average) is a more robust measure.

The below article was written by the president of the national council of measurement in education. The median was debunked a few years ago and more recent research supports the mean again.

http://scholar.harvard.edu/files/andrewho/files/final_manuscript.pdf

Matt Raimondi

Assessment & Accountability Coordinator

School District U-46

355 E Chicago St

Elgin, IL 60120

Phone: 847-888-5000 (5382)

Fax: 847-888-7167

Webinar: <http://join.freeconferencecall.com/assessment>

Audio: 712-775-7031, 511-430#

GROWTH

- Which approaches to student academic growth have appeal and which ones do not? Why or why not?

Mean SGPs are the best to determine "how much growth". I would also include a percentage of students who met an expected target (how many students). In U-46, we use two metrics for growth. One that is designed to measure **how much growth** and the other to determine **how many students** met their targets. Most of the time they are very similar but not always. This will mitigate some of the error of SGP and retain public understanding of the growth metrics.

Example,

School A had an Average SGP of 52 and 59% of students met their individual expected growth targets.

School B had an Average SGP of 75 and 59% of students met their targets.

School C had an Average SGP of 75 and 42% of students met their targets. (lots of growth but only from a few students).

- Which model of weighting makes the most sense in Illinois (51/49, 60/40, 70/30) and will best provide the information schools need to identify and obtain supports when necessary?

50%-60% Growth is good. Don't waste too much squandering about this. Pick a number and go with it.

- Are there additional approaches to student academic growth that stakeholders would like to see explored? If so, what are the additional approaches?

Percentage of students meeting expected growth targets.

Matt Raimondi

Assessment & Accountability Coordinator

School District U-46

355 E Chicago St

Elgin, IL 60120

Phone: 847-888-5000 (5382)

Fax: 847-888-7167

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U-46 Privacy Disclaimer

This message, including any attachments, may contain confidential information or proprietary information, and is intended for the person / entity to whom it was originally addressed. Any use by others is strictly prohibited.

Dear ISBE –

Regarding ESSA Draft 2 Section 3.1, I support a Hybrid Model including Student Growth Percentile (SGP) and Growth to Proficiency (GtP) using the 70/30 weighting algorithm.

GROWTH

Advantages of SGP include meaningful student level growth; relatively easy to understand by stakeholders; demographically agnostic; established strong growth rates relative to national sample.

Advantages of GtP include meaningful student level growth; lower error than SGP; more precise than value tables; in contrast to SGP, no comparison to students in similar score bands; historic evidence of strong growth rate.

A Hybrid Model of these two provides a multidimensional perspective to student growth that is meaningful/actionable at the student and school level; demonstrates lowest correlation when combined (~0.28).

Additionally, I advocate for larger than n=20 subgroup size definition; specifically, subgroup size should be retained at 45 using a 95% confidence interval to maintain quality statistical decision-making. See extensive rationale for this subgroup size in the updated ISBE January 2009 Accountability Workbook.

Thank you for your consideration of our input and please contact me if you have any questions.

Happy Holidays,

Patrick

Patrick W. Nolten, Ph.D.

Executive Director of Assessment, Research and Evaluation

Indian Prairie Community Unit School District 204
Howard Crouse Education Center
780 Shoreline Drive
Aurora, Illinois 60504

630.375.3034 (direct)
630.375.3033 (Lisa)
630.375.3001 (fax)
630.779.1805 (cell)

ISBE requests feedback from the field on the following questions: (1) Which approaches to student academic growth have appeal and which ones do not? Why or why not? (2) Which student growth model makes the most sense as a part of Illinois's accountability system? (3) Which model of weighting makes the most sense in Illinois (51/49, 60/40, 70/30) and will best provide the information schools need to identify and obtain supports when necessary? (4) Are there additional approaches to student academic growth that stakeholders would like to see explored? If so, what are the additional approaches?

I support a Hybrid Model including Student Growth Percentile (SGP) and Growth to Proficiency (GtP) using 70/30 weighting algorithm. Advantages of SGP include meaningful student level growth; relatively easy to understand by stakeholders; demographically agnostic; established strong growth rates relative

GROWTH

to national sample. Advantages of GtP include meaningful student level growth; lower error than SGP; more precise than value tables; in contrast to SGP, no comparison to students in similar score bands; historic evidence of strong growth rate. A Hybrid Model of these two provides multidimensional perspective to student growth that is meaningful/actionable at the student and school level; lowest correlation when combined (~ 0.28); Additionally, I advocate for larger than $n=20$ subgroup size definition. Thank you for your consideration of my input.

Patrick W. Nolten, Ph.D. 630-375-3034 or patrick_nolten@ipsd.org

LETTER TO DR. SMITH

So many studies have shown that certified full-time librarians in schools k-12 increase learning as documented by test scores. These statistics apply no matter what the economic status of the student body. Yet the large majority of districts, when financial decisions are being made, do not view well staffed, well supplied librarians as a priority. I know of schools that pride themselves on the number of students they send off to college, yet are unwilling to provide the research tools and library skills needed to succeed in college.

I am a high school librarian. The vast majority of our students approach their first research papers with no background research skills. They don't know how to use a book's index, or even why it's a valuable tool. They don't know how to find books that the library has in its collection using a catalog. They don't know how to locate a book on the shelf. (Aside: I have observed that students who know how to use books for research are better at internet research.)

Internet research is accomplished by random Googling. Students don't know how to use a database assuming one is available to them. I even have worked with teen students who do not know how to use an encyclopedia.

Without elementary and middle school librarians, students arrive at high school with little or no library background. In high schools basic research skills have to be taught before moving on to the high school level. The materials students need, print and electronic, are limited. And for those schools with no librarians, collections quickly become disorganized and materials go missing; technology is often in disrepair or used for non-academic searches.

Please stop minimizing the value of a quality school library. Please stop relegating public school libraries and staff to the cuts column in the budget.

Sue Laubersheimer, Librarian
Lanphier High School
Springfield IL
217 525 3080 x236

"I have always imagined that Paradise will be a kind of library." **Jorge Luis Borges**

In any school district, regardless of how high achieving that district looks on paper, there will be economic disparities between students. There will always be students who will not have access to the resources that they need to succeed. This is where school libraries bridge that gap. School libraries are places where students have access to computers, books, and information. It is a place where they can go to receive the help and resources that they need.

LETTER TO DR. SMITH

I have personally witnessed this on a daily basis. I work as a High School librarian. I open my doors at 7:15 a.m. There is always a line of students waiting to get in. They come to use the computers, access resources, research, ask questions, print, read, study, and work on homework.

I work in close collaboration with many Language Arts teachers in my building. I am given a copy of research projects and will pull books, have resources available, and create handouts for students to use. Luckily, I am still able to afford databases so I create student guides to help them navigate and find all of the resources that we have. Resources that are digital and in print. As a certified school librarian, I have the knowledge and skills necessary to guide students in their research.

I have assessed databases, bought resources, studied these resources, and took the time to educate and prepare myself to meet with students. Much like lesson planning, I study the resources I have in order to meet the needs of the students in my building.

Anyone can create a link on a website and point the students to it. I offer research classes for students where I show them how to find and use these resources. We talk about finding reliable resources, how to use these resources, and how to conduct research that builds off basic knowledge to analyze topics in-depth using our digital and print collection. These are conversations that happen all year long, in class, one-on-one, before and after school. As a librarian, I am available to help the students and answer their questions.

Without a certified school librarian, a library is just a room with books. The librarian is the person who brings the collection alive to students. Many of my conversations start with, "Let me show you this resource," or "Have you read this book?" I am not simply someone who checks out books, I am a living resource that is available to all students regardless of skill level, ability, income, background, gender, or any other issue faced by students in public school. The library is a place for everyone and has something for everyone. Every student deserves access to a qualified professional librarian to help them bridge the gap in learning, resources, and income. A person to introduce them to a world of knowledge that extends beyond the walls of the school, classroom and home.

Noel Clevenger
GHS Librarian
Glenwood High School

LETTER TO DR. SMITH

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

I am writing to comment on the second draft of ISBE's plan to implement ESSA. As an education professional, I know ESSA provides an opportunity to end 15 years of NCLB's test-and-punish approach, to move to fairer and more equitable resource distribution, and to ensure student testing supports teaching and learning. But currently, ISBE's draft ESSA plan is still grounded in an NCLB mindset, which I urge you to change.

School and district accountability must shift dramatically to address inequity and provide adequate support and resources for all public schools. It must also provide differentiated supports, based on evidence-based practices determined locally by practitioners, families, and community members who know the community and school best. Assessments must be rooted in classroom content and measure what students know and can do, rather than reflect the effects of poverty. Fair and meaningful academic growth measures should be included.

The new accountability system should maximize the weight of the school quality and success indicator to the greatest extent possible so we can stop prioritizing testing over learning. I urge you to base this indicator on:

- Access to social and academic services and supports;
- Inclusivity of a broad and rich curriculum focused on the various inputs that create a well-rounded educational experience for students;
- Percentage of 9th grade students on track/high school readiness;
- Chronic absenteeism; and
- Student and teacher climate surveys.

At this time, I encourage ISBE to exclude from the accountability system measures like high

LETTER TO DR. SMITH

school growth and a college and career ready indicator. These require further research, analysis, and consensus building before becoming part of a high-stakes accountability system. In addition, ISBE should not “publicly shame” schools by publishing a summative score of all indicators that institutes top-down punitive measures, especially on schools in high-poverty communities.

I also urge ISBE to ensure meaningful union, parent, and community voice in school improvement efforts to best support student needs. ISBE can best serve schools as a clearinghouse to provide research-supported ideas and strategies. ISBE’s proposal to use scarce funds to require a statewide, multi-tiered system of support in MTSS is a misuse use of MTSS.

Finally, educators have spent many hours developing the Illinois Balanced Accountability Measures (IBAM) Quality Framework and Rubric. It is important to ensure that there is a clear role for both of these when determining differentiation and needed supports.

Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

Kyle Adelman

kadelmann@lphs.net

311 Balbo Rd.

LaSalle, Illinois 61301

LETTER TO DR. SMITH

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LETTER TO DR. SMITH

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Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

In addition, as a psychologist that works with severely disabled population. Progress can not be measured adequately on any standardized measure!

Regina Nix

reginatony@ameritech.net

563 Greenbay ct

Lake Zurich, Illinois 60047

LETTER TO DR. SMITH

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

I am writing to comment on the second draft of ISBE's plan to implement ESSA. As an education professional, I know ESSA provides an opportunity to end 15 years of NCLB's test-and-punish approach, to move to fairer and more equitable resource distribution, and to ensure student testing supports teaching and learning. But currently, ISBE's draft ESSA plan is still grounded in an NCLB mindset, which I urge you to change.

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LETTER TO DR. SMITH

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Sonya Leathers

sonyal@aol.com

605 N Marion St

Oak Park, Illinois 60302

State Board of Education,

LETTER TO DR. SMITH

Dear ISBE Superintendent Dr. Tony Smith,

I am writing this letter to express my opinions about the education system in the state of Illinois. I am a retired college counselor, I have four grown children, and was born and raised in the Chicagoland area. My children attended public grade school, and catholic high school. My youngest child attended catholic school all 12 years. All of my children have graduated from college, and are gainfully employed.

The first thing I would like to say is, MONEY is NOT the answer to our education problems. It will not fix one thing. We already waste enough money, and have very little to show for it. We need to fix our broken homes. Parents need to stress the importance of education to their children, and support their learning. We need to have more discipline in the schools. Teachers spend far too much time disciplining children and not teaching. Political correctness is destroying our society. We are raising a generation of wimps. Everything is about feelings, which are fleeting at best. We no longer care about doing the "right thing", even though it may not be easy. Schools seem to have an agenda nowadays that is not about teaching children how to think, but what to think.

Thank you for letting me voice my opinions. I would use the private schools model in shaping the future of public education.

Christine Dewey

Christine Dewey

isucoryphee@gmail.com

404 Polo Club Drive

Glendale Heights, Illinois 60139

LETTER TO DR. SMITH

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

I am writing to comment on the second draft of ISBE's plan to implement ESSA. As an education professional, I know ESSA provides an opportunity to end 15 years of NCLB's test-and-punish approach, to move to fairer and more equitable resource distribution, and to ensure student testing supports teaching and learning. But currently, ISBE's draft ESSA plan is still grounded in an NCLB mindset, which I urge you to change.

School and district accountability must shift dramatically to address inequity and provide adequate support and resources for all public schools. It must also provide differentiated supports, based on evidence-based practices determined locally by practitioners, families, and community members who know the community and school best. Assessments must be rooted in classroom content and measure what students know and can do, rather than reflect the effects of poverty. Fair and meaningful academic growth measures should be included.

The new accountability system should maximize the weight of the school quality and success indicator to the greatest extent possible so we can stop prioritizing testing over learning. I urge you to base this indicator on:

- Access to social and academic services and supports;
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- Percentage of 9th grade students on track/high school readiness;
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At this time, I encourage ISBE to exclude from the accountability system measures like high

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school growth and a college and career ready indicator. These require further research, analysis, and consensus building before becoming part of a high-stakes accountability system. In addition, ISBE should not “publicly shame” schools by publishing a summative score of all indicators that institutes top-down punitive measures, especially on schools in high-poverty communities.

I also urge ISBE to ensure meaningful union, parent, and community voice in school improvement efforts to best support student needs. ISBE can best serve schools as a clearinghouse to provide research-supported ideas and strategies. ISBE’s proposal to use scarce funds to require a statewide, multi-tiered system of support in MTSS is a misuse use of MTSS.

Finally, educators have spent many hours developing the Illinois Balanced Accountability Measures (IBAM) Quality Framework and Rubric. It is important to ensure that there is a clear role for both of these when determining differentiation and needed supports.

Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

Donellyn Dean

donellyn.dean@wfschools.org

1301 Hazel

Johnston City, Illinois 62951

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Norma Moruzzi

normamoruzzi@gmail.com

831 W. Ainslie St. #2

Chicago, Illinois 60640

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Jodie O'Shea

joshea@d123.org

10136 S Kedvale

Oak Lawn, Illinois 60453

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Tasha Hurn

tamaurie1@yahoo.com

9526 S 53rd Ave

Oak Lawn, Illinois 60453

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Kristy Underwood

kristy2688@yahoo.com

18 Cour Deauville

Palos Hills, Illinois 60465

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Kathleen Budewitz

kbudewitz@gmail.com

10008 S. Fairfield Ave.

CHICAGO, Illinois 60655

State Board of Education,

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Jeri Shaw

jshaw@wfschools.org

14926 State Highway 14

Benton, Illinois 62812

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith:

I would like to comment on the second draft of ISBE's plan to implement ESSA. As a public university professor, I have ten years of experience with underprepared undergraduates in Illinois. ESSA provides an opportunity to end 15 years of NCLB's test-and-punish approach, to move to fairer and more equitable resource distribution, and to ensure student testing supports teaching and learning. But currently, ISBE's draft ESSA plan is still grounded in an NCLB mindset, which I urge you to change.

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of poverty. Fair and meaningful academic growth measures should be included.

The new accountability system should maximize the weight of the school quality and success indicator to the greatest extent possible so we can stop prioritizing testing over learning.

Students need to learn to think, for learning is more than rote memorization. I urge you to base this indicator on:

- Access to social and academic services and supports;
- Inclusivity of a broad and rich curriculum focused on the various inputs that create a well-rounded educational experience for students, including rich offerings in the arts and humanities;
- Percentage of 9th grade students on track/high school readiness;
- Chronic absenteeism; and
- Student and teacher climate surveys.

At this time, I encourage ISBE to exclude from the accountability system measures, like high school growth and a college and career ready indicator. These require further research, analysis, and consensus building before becoming part of a high-stakes accountability system. In addition, ISBE should not “publicly shame” schools by publishing a summative score of all indicators that institutes top-down punitive measures, especially on schools in high-poverty communities.

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Merrill Cole

M-Cole@wiu.edu

203 E JACKSON ST APT 1

Macomb, Illinois 61455

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

I am a current professor at WIU, and had a career in industry before that. I cannot tell you how disgusted I am with the attitude of some faculty that I see. They show little care for the students or the tax payers of the state.

I recently served on a committee reviewing degree programs and cannot tell you how often I head faculty comments that having graduates get jobs was not important, that faculty should not be reviewed based upon the industry or society need for their degree, and that some should be paid to just be on campus - that actually teaching was beneath them.

I want to encourage you to look at what the needs are in today's career environment and ensure that these skills are included in the classroom. For example, a recent survey showed that 2/3rds of our English faculty do not grade on spelling or writing structure. This places our students at an enormous disadvantage as they start to apply for jobs, and in their actual work environment. If

LETTER TO DR. SMITH

faculty and teachers will not teach what is needed, they should be educated about these needs, or replaced. The students in the classroom, and the tax payers of Illinois, deserve no less.

The teacher unions state that "school and district accountability must shift dramatically" and I totally agree. They should be shifted to the successful schools and teachers, and then allow all students to attend these school. School choice should be a part of any plan as that is the one true way for good programs to be identified and those that are bad to punished for their failures.

There are calls to end testing, but that is generally by those who cannot teach. You cannot manage something that is not measured, and test scores are one of several measurements that should be used. In addition, things like industry acceptance of graduates should be looked at. For example, students with good basics are in high demand for many jobs, and students going directly into these jobs should also be looked upon as educational successes.

I note that my union calls for "access to social and academic services", but nowhere calls for career services. Again, based upon comments received in an earlier study, many in the education union leadership do not feel that jobs are nor should be a goal of education. This is a fight we are currently having at WIU where many faculty are fighting a phrase that includes preparing students for a career in the university's mission statement. Graduates and students being successful in their career should be the top goal of education, not something to be ashamed of.

Unlike the union, I encourage ISBE to include accountability system measures like high school growth and a college and career ready indicator. There is no need for further research, analysis, and consensus building before becoming part of a high-stakes accountability system. If they are not part, then there is no reason for State tax money to be spent on education.

Finally, it is amazing that while people praise lists that review all types of business and services, the unions don't want similar systems for schools. If you are doing a good job, you would want to be rated. Their fear of any ranking indicates that they have been robbing the State of Illinois for decades, and that change is necessary.

LETTER TO DR. SMITH

Thank you for the opportunity to comment. If you have any questions, I would be happy to provide further information. As an outsider who is now in the education environment, I am shocked by what I see. Many of these practices need to be changed, and this could be a good start.

Barton Jennings
Professor of Supply Chain Management
Western Illinois University

Barton Jennings
BE-Jennings@wiu.edu
P.O. Box 620
Avon, Illinois 61415

State Board of Education,

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Rebecca Pruse

rebecca_pruse@yahoo.com

11217 N Oakwood Dr, 64

Peoria, Illinois 61615

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The reality is that current resources available to schools are focused too much on testing to comply with "growth". Money goes to purchasing tests (like NWEA-MAP) & PARCC along with the technology to administer them. Instead, funds should go to developing curriculum & wrap around services in order to create a supportive environment for success.

Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

Elaine Barlos

ebarlos@sbcglobal.net

9613 S. Kedvale Ave.

Oak Lawn, Illinois 60453

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Measures (IBAM) Quality Framework and Rubric. It is important to ensure that there is a clear role for both of these when determining differentiation and needed supports.

Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

Stacie Sovinski

sovinski1@sbcglobal.net

1640 Sun Ridge Dr

Bourbonnais, Illinois 60914

State Board of Education,

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Caitlyn Clayton

caitclayton@yahoo.com

3601 N Kingston Dr, #2

Peoria, Illinois 61604

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

First and foremost, we need comprehensive, curriculum -inclusive information literacy instruction for our students. Bring back public school librarians and make rigorous metaliteracy a central tenet of education that touches all corners of the curriculum. These skills should be age-appropriate but should prepare students for the ACRL information literacy Framework.

I am writing to comment on the second draft of ISBE's plan to implement ESSA. As an education professional, I know ESSA provides an opportunity to end 15 years of NCLB's test-and-punish approach, to move to fairer and more equitable resource distribution, and to ensure student testing supports teaching and learning. But currently, ISBE's draft ESSA plan is still grounded in an NCLB mindset, which I urge you to change.

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Todd Heldt

theldt@hotmail.com

3346 s wallace

Chicago, Illinois 60616

State Board of Education,

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Heather Grossman

hegrossman@yahoo.com

605 W Ohio Street

Urbana, Illinois 61801

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Bhaskar DasGupta

bdasgup@uic.edu

843 W ADAMS ST APT 504

CHICAGO, Illinois 60607

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Sharon Teefey

teefey@hotmail.com

213 E Union

Mt Sterling, Illinois 62353

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Karen Kobylarz

kkobylar@att.net

5728 South Natchez

Chicago, Illinois 60638

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Diane Carlson

drmom49@hotmail.com

1652 Lake Dr

Harrison , Michigan 48625

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Elizabeth Lopez

lalyswishytail@wowway.com

30W204 Argyll Lane

Naperville , Illinois 60663

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Jolie Misek

joliemisek@hotmail.com

9317 Pine Needle Pass

Wonder Lake, Illinois 60097

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Sharon Teefey

teefey@hotmail.com

213 East Union

My Sterling, Illinois 62353

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Troy Redfern

tredfern@stauntonschools.org

615 Stonecreek Drive

Staunton, Illinois 62088

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marklindanell@yahoo.com

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Geneva, Illinois 60134

State Board of Education,

Dear ISBE Superintendent Dr. Tony Smith,

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LETTER TO DR. SMITH

School and district accountability must shift dramatically to address inequity and provide adequate support and resources for all public schools. It must also provide differentiated supports, based on evidence-based practices determined locally by practitioners, families, and community members who know the community and school best. Assessments must be rooted in classroom content and measure what students know and can do, rather than reflect the effects of poverty. Fair and meaningful academic growth measures should be included.

The new accountability system should maximize the weight of the school quality and success indicator to the greatest extent possible so we can stop prioritizing testing over learning. I urge you to base this indicator on:

- Access to social and academic services and supports;
- Inclusivity of a broad and rich curriculum focused on the various inputs that create a well-rounded educational experience for students;
- Percentage of 9th grade students on track/high school readiness;
- Chronic absenteeism; and
- Student and teacher climate surveys.

At this time, I encourage ISBE to exclude from the accountability system measures like high school growth and a college and career ready indicator. These require further research, analysis, and consensus building before becoming part of a high-stakes accountability system. In addition, ISBE should not “publicly shame” schools by publishing a summative score of all indicators that institutes top-down punitive measures, especially on schools in high-poverty communities.

I also urge ISBE to ensure meaningful union, parent, and community voice in school improvement efforts to best support student needs. ISBE can best serve schools as a clearinghouse to provide research-supported ideas and strategies. ISBE’s proposal to use scarce funds to require a statewide, multi-tiered system of support in MTSS is a misuse use of MTSS.

LETTER TO DR. SMITH

Finally, educators have spent many hours developing the Illinois Balanced Accountability Measures (IBAM) Quality Framework and Rubric. It is important to ensure that there is a clear role for both of these when determining differentiation and needed supports.

Thank you for the opportunity to comment on this complex and important plan. I urge ISBE to address my concerns and get the Illinois ESSA plan right by not allowing it to become a continuation of NCLB.

Marybeth Scott

cotton534@sbcglobal.net

534 Cottonwood Circle

Bolingbrook, Illinois 60440

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Bari Levin

mbjl11@sbcglobal.net

64 E. Preserve Drive, Palatine 60074

IL, Illinois 60074

LETTER TO DR. SMITH

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Linda Hill

marklindanell@yahoo.com

Linda Hill

Geneva, Illinois 60134

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Julie McShane

jmcshane34@gmail.com

323 N. Marion

Oak Park, Illinois 60130

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Educationally Yours,

Cynthia

Cynthia Riseman Lund

criseman@ift-aft.org

2604 Killarney

Springfield , Illinois 62711

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is

LETTER TO DR. SMITH

defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward. I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

--

Dr. Nancy Wagner
Superintendent
Beach Park School District 3
847.599.5070

Hello, Here are a couple points that I feel are very important to our students success in education.

1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing." By including the AND instead of the OR, it goes against the recommendations set forth by [Redefining Ready](#) and creates an unrealistic metric. We do not fear accountability but advocate for realistic and rigorous metrics. Redefining Ready has set forth a realistic and rigorous framework.
2. For the accountability assessment, those districts utilizing a standards aligned and nationally normed assessment (such as MAP) should be able to use that assessment instead of PARCC. This will allow for increased instruction time while still providing a normative assessment as part of a balanced assessment system.

Thank you for your time.

Heather Beck
General Music Instructor
John Deere Middle School
(309) 743-8685
hbeck@molineschools.org

-
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LETTER TO DR. SMITH

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Thank you!

Mrs. Annette Epperly
8-GOLD Pre-Algebra/Algebra

My concern is that we are looking to use A.P. classes as a criteria for college readiness. In rural school districts, the ability to offer such classes has been limited due to faculty cuts due to decrease funding from the state level. This correspondence is not to complain about funding, but to point out that allowing A.P. classes to be used puts rural community schools in a disadvantage.

Is there a way around using the A.P. classes in this metric? A solution could be to allow rural community school districts the opportunity to have these classes online through a virtual school. These rural schools would have to pay for the class. I believe the pay should be discounted due to the burden that A.P. classes would place on districts otherwise.

Joe Sornberger
Superintendent
ROWVA CUSD #208
309-483-3711

RE: ESSA

To Whom It May Concern,

Many problems with our Illinois school system is a lack of accountability for teacher performance and lack of training in professional, ethical conduct of school administrators. Segregating students with disabilities and race is also a problem. ISBE's current policies and rules do not adequately enforce laws when formal complaints are filed against public school districts; local school districts operate under no authority. The outcomes resulting from formal complaints need to produce a result that promotes a real change in both the professional and ethical conduct of educators and administrators. Who at ISBE is examining educational models implemented in other states that have shown growth, have been financially stable, and where education professionals remain in practice based upon their performance and community approval rating? As an Illinois residents we continue to hear of a lack of funding at both local and state levels. This is difficult to accept as an excuse because we pay significantly more in taxes than most all states. Approximately 2/3 of our property taxes go to our school districts and misuse of school funding at local levels is publicized without any recognition from a governing agency. Professional training will not help to remedy these core problems.

Thank You

LETTER TO DR. SMITH

Sent from my T-Mobile 4G LTE Device

Hello,

I attended the Listening Tour hearing in Galesburg today. While I was able to ask Jason Helfer about how IL's ESSA state implementation plan may address providing advanced learning opportunities to K-8 students, in order to allow them access to advanced coursework in high school, I had prepared testimony to share. The format of this listening session was geared to more of a question/answer format, so I did not give my complete testimony. I have included my prepared comments below:

Thank you for inviting us to speak today. My name is Kristen McElligatt. I am a retired educator and administrator from IL's public school system. I've worked in the Chicago suburban area and completed my career in public education in Peoria. I am currently an adjunct faculty at Bradley supervising student teachers. I am also an active member of the Illinois Association for Gifted Children (IAGC) and a Past President of that organization.

First, I'd like to comment on the Accountability System development. IL needs a growth model that holds all schools accountable for individual student growth, including students who are already at or above the proficiency designation.

This is an equity issue. Student potential exists in every community, but access to opportunities and resources to develop that potential are highly inequitable. IL has large opportunity gaps and therefore, large excellence gaps between economically disadvantaged and non-disadvantaged students. This gap is more evident since IL eliminated funding for gifted grants in 2003. Now only a small percentage of IL school districts provide any services to highly able students. Those that do tend to be in the more affluent districts. I have worked in two of the districts cited in the 2016 report, Untapped Potential, put forth by One Chance Illinois. (Wheeling District 21 and PSD 150) where these opportunity and excellence gaps exist. ISBE, through the ESSA implementation plan, can work to decrease these gaps that impinge on low-income/high poverty students' civil rights to accessing challenging curriculum.

This is a much broader issue than serving identified gifted students— rather, it is an opportunity for IL to effectively and comprehensively advocate for high ability and high potential students.

IL needs to adopt a growth model that supports growth of all students rather than a “growth-to-proficiency model” that would put a focus on students below proficiency

Why? 1/3 of IL students are already performing at the proficient level or higher as documented in our state data. Every student deserves to be challenged, but thousands of students will be ignored in a growth-to-proficiency model. How are we accountable for these students' growth? How do we ensure that students who are already proficient learn and grow over the course of a school year?

In addition, ISBE's Draft 2 school quality indicators focus heavily on high school outcomes. Waiting to increase access in high school is too late. IL needs to address the whole K-8 pipeline, as college readiness and high achievement starts early. In ISBE's Draft 2, there are provisions for expanding access to online AP courses and dual enrollment — but that only serves students in their last 2-3 years of high school. We need opportunities for schools to offer talent development opportunities and advanced coursework in grades K-8 as well.

LETTER TO DR. SMITH

Bright disadvantaged students who go underserved for their first 8-10 yrs of school will not be those who can take advantage of the opportunities (AP/advanced coursework) noted in Draft 2. Evanston School District 65, with their partnership with Northwestern University, has a successful 12 year track record of tapping potential beginning in elementary grades to increase student opportunities in high school. For additional information, see the attached document, Project+Excite.pdf.

Here are some other resources you may find helpful in your future work:

NAGC ESSA Resources: <http://www.nagc.org/get-involved/advocate-high-ability-learners/nagc-advocacy/federal-legislative-update/every-student>

IAGC general ESSA implementation Recommendations (Prior to release of ISBE Draft 1):
<https://docs.google.com/document/d/1tEpLxQeAI7rKq7yeOKf-rU8sMzNWjbUhjbKZifoEk2U/edit>

IAGC detailed comments on ISBE ESSA Implementation Draft Plan #1:
<https://docs.google.com/document/d/1TIJ4PTKLBf7Vy1qJ1mJOtCAX0ATUUjmQMyHkUeEwqnc/edit?usp=sharing>

Do not hesitate to contact me if I can be of any assistance.

Sincerely,
Kristen McElligatt
3518 N Knoxville Ave
Peoria, IL 61603
[847-312-4913](tel:847-312-4913)

1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing."

2. PARCC should NOT be the accounted for state assessment. We need an assessment allowing for aligned standards that is normative and balanced such as MAP.

Ms. Brandi Neer
7 Blue ELA~Reading Specialist
John Deere Middle School

This is the most current analysis I've seen of different growth metrics for accountability. Please avoid median growth Percentiles despite their popularity. The mean (average) is a more robust measure.

The below article was written by the president of the national council of measurement in education. The median was debunked a few years ago and more recent research supports the mean again.

LETTER TO DR. SMITH

http://scholar.harvard.edu/files/andrewho/files/final_manuscript.pdf

Matt Raimondi

Assessment & Accountability Coordinator

School District U-46

355 E Chicago St

Elgin, IL 60120

Phone: 847-888-5000 (5382)

Fax: 847-888-7167

Webinar: <http://join.freeconferencecall.com/assessment>

Audio: 712-775-7031, 511-430#

Dear Gil,

It was a pleasure speaking to you yesterday regarding my concern for my son , Peter, who is a misidentified ELL student. I am relieved and thankful that I am being heard and that the Division of English Language Learners is making an attempt to help those who have been placed incorrectly.

My recommendations to prevent and help misidentification of students are:

1. Provide an exit from the yearly ACCESS testing if a student is misidentified as an EL student.
2. Provide an exit from the ELL Program if misidentified
3. Re-screen students at any time if a parent, teacher, special education team, believe that a student is misidentified as an ELL student
4. Provide for a safeguard to prevent misidentification of ELL students: such as yearly re-screening, required documented yearly collaboration between speech & language pathologists, teachers, parents, and/or healthcare providers

LETTER TO DR. SMITH

5. Provide parents with the option to EXIT the ELL program AND the ACCESS testing if that is their wish or desire.

I also provided these recommendations on October 5, 2016 to essa@isbe.net . I hope they have been reviewed and they are being considered.

Thank you so much for your interest and effort to help my son in this situation. My family is greatly appreciative to you for that. Please keep in contact with me to update me with the progress you obtain for all of the students in this predicament.

Happy Holidays!

Loula Dimas
847-965-8661

Dec. 1, 2016

ISBE Listening Tour on ESSA STATE PLAN

Viewing the ESSA document I have questions regarding accommodations for students with disabilities. The world is full of examples of accommodations that permit people with disabilities to perform specific tasks they might not otherwise be able to do.

Accommodations play an important role in educational settings too, particularly for students whose Disability interfere with performing learning tasks (such as reading a book, taking notes in class, Or writing an essay) or testing tasks (such as getting through the items within the time limit or Filling in the circles on a multiple chose test). A critical part of teaching and assessing students With disabilities, such as a learning disability or the English Language Learning student, is providing them with accommodations that support learning and that support their ability to show what they know and can do. There are different types of accommodations.

Presentation accommodations: Students with print disabilities defined as difficulty or inability to Visually read standard print because of a physical, sensory or cognitive disability.

Response Accommodations: Students with physical, sensory or learning disabilities (Including difficulties with memory, sequencing, directionality, alignment and organization).

Timing and Scheduling Accommodations: Students who need more time, cannot concentrate for extended periods, have health-related disabilities, fatigue easily, special diet and/or medication needs.

Setting Accommodations: Students who are easily distracted in large group settings, Concentrate best in small groups.

One accommodation for ELL students that Illinois is failing to provide in many instances is **A qualified bilingual interpreter**. . EL parents of children with disabilities become effectively foreclosed from meaningful participation in the education process in the absence of qualified, competent and well trained bilingual interpreters.

Thank you, and if I can be of further assistance, please contact me at LDA/IL 708-430-7532

Penny Richards, Board Learning Disabilities Association of Illinois www.LDAIL.org

THIRD STATEWIDE LISTENING TOUR TO GATHER FEEDBACK ON ESSA STATE PLAN

December 6, 2016

Chicago Public Schools - Austin HS 5610 West Lake Street, Chicago, Illinois

Submitted to ISBE Melina Wright, ESSA, Chapter #1

Review of the ISBE document from the second statewide listening tour on the ESSA State Plan, September 2016, suggested that the following information was missing:

1. Transition assessments for ENGLISH LEARNERS WITH DISABILITIES beginning at 14 years of age in grammar school and assessments for EL students with IEPs graduating from high school. This assessment is required for students with significant disabilities, for students with moderate disabilities, and for students with IEPs whose disabilities need modifications in 2 or 4 year college programs.
2. During the last four years many parents complained over and over again that their EL children had graduated without an appropriate IEP that can be utilized to program the EL student into an accepting college. However, this then became a significant hardship to parents when the graduating high school sent the student for a vocational assessment to a private provider who charges between \$2,000. and \$3,000. for the assessment.
4. School districts throughout Illinois do not provide highly qualified bilingual special education interpreters to provide IEP information to parents whose primary language is other than English and who have children with disabilities. Such trained and qualified interpreters are to be used exclusively for IEP conferences.

Please review IDEA, ILLINOIS RULES AND REGULATIONS FOR SPECIAL EDUCATION, RULES AND REGULATIONS FOR BILINGUAL EDUCATION, COURT CASES. San Francisco's Judge Ruling (2015). Office of Civil Rights (2014, 2015, 2016).

Respectfully submitted by,
Julieta Rosales Pasko, NCSP
Bilingual School Psychologist
Learning Disabilities Association of Illinois Vice-President
Parents Helping Parents, Latino Parent Group with Children with Disabilities
F.E. Familias Especiales, (Special Families)
Probono advocate for EL students with disabilities and their parents.

Hello,

My name is Amanda Underfanger and I am currently working on the new ISBE Website. I need to ensure that the workflow is working correctly and sending email to this address when an end user chooses the "Give us your Feedback!" on the ESSA page in the new website.

LETTER TO DR. SMITH

Can you please let me know if you received this email and when I could send a quick test email to this address to ensure everything is working?

Thanks,

Amanda

Dear ISBE,

Thank you for the opportunity to comment on Draft #2 of our ESSA plan.

On page 22 under academic indicators there are six indicators listed. Due to the size of my school district my students will only be able to possibly meet 3 of the indicators. We do not have advanced placement or IB courses. How will this disparity be taken into account for the many schools across Illinois that are in a similar situation as mine?

Pages 23 - 36 contains a lot of information regarding student growth. Over the last two years my school district has created a student growth plan as it relates to PERA. Does the plan contained in this document conform to the requirements of PERA? If not, does this mean we will have to dismantle 2 plus years of work? I understand that PERA is an Illinois law, but it would be nice if our federal plan and current Illinois worked in unison.

I have a very diverse school district. We have at least 20 different languages spoken by our students and some language with very different dialects. In addition, I have a substantial number of students that live in extreme poverty. How does our ESSA plan take these variable into consideration?

Again, thank you for the opportunity to comment on this plan.

Professionally,

--

Ed Fletcher, Superintendent
Monmouth-Roseville CUSD #238
105 North E Street
Monmouth, IL 61462
(309)734-4712

Dear Members of the Illinois State Board of Education:

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is

LETTER TO DR. SMITH

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I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Sincerely,

Catherine

Catherine M. Finger, Ed.D

Superintendent of Schools
Grayslake Community High School District 127
400 North Lake Street
Grayslake, Illinois 60030
847-986-3441

"Every Student, Every Day"

To: Illinois State Board of Education

From: Kyle W. Freeman, Ph.D.

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Kyle W. Freeman, Ph.D.
Superintendent of Schools
Washington CHSD #308
(309) 444-3167

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Sincerely,

Kristen Young
NBCT English Language Arts
John Deere Middle School
309.743.8673

To: *Illinois State Board of Education*

From: *Dr. Melissa Kaczowski, Superintendent, Roselle School D12*

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

*In addition, there is a group of dedicated superintendents in DuPage County that are also working on a similar framework for K-8. I absolutely support the adoption of a framework **that is directly taken from research for K-12 in Illinois!** It is time that Illinois sets the standard for making well-informed, research-anchored decisions regarding education. I am not aware of another profession that has policy and rules/regulations set for them by those who are not specialists in the field. It is time that we acknowledge and honor the science that supports best practices for teaching, learning and assessment and allow the science and research to drive our decisions!*

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Respectfully,
Dr. Melissa Kaczowski

LETTER TO DR. SMITH

To: Illinois State Board of Education

From: Jeremy Darnell

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

--

Jeremy Darnell
GCMS Superintendent of Schools
307 N. Sangamon Ave.
Gibson City, IL 60936
(217)784-8296
darnell.jeremy@gcmsk12.org

Good morning,

Please find below comments on Draft #2 of Illinois' ESSA Plan. Thank you.

- 1.2.A; Plan Coordination (p. 7): I am concerned with and oppose, the idea that the ISBE will “contemplate the most appropriate ways to braid funding.” The example citing IDEA Parts B and D funding in the following paragraph may have allowed Illinois to support its statewide MTSS system, but it has also siphoned from students with disabilities money that should be dedicated to special education. I oppose any braiding of funds if the result is erosion of dedicated funds for students with disabilities.
- 2.2 Academic Assessments (p. 10-11): The current options of DLM or PARCC/SAT are too restrictive for students with disabilities. There are many students with disabilities who do not meet the significant cognitive disability requirement suggested for DLM participation, but who also are not able to participate extensively in the general curriculum or PARCC/SAT option, even with appropriate accommodations. If students do not have access to or meaningful participation in the general education curriculum, it is not appropriate to test them on the curriculum. This also does not give meaningful information to the state or district in terms of how the student's education is benefitting him/her nor does it provide the teacher with meaningful information to help inform instruction. I also disagree with the use of an assessment which will not provide the accommodations which the student needs and are determined by the IEP team; SAT determines accommodations outside of the IEP process.
- 3.1 Accountability System, Illinois College and Career Ready Indicator Framework (p. 20-): I am concerned about both the initial plan for the indicators as well as the proposed pathways and

LETTER TO DR. SMITH

they relate to students with disabilities. Students with disabilities must be considered in the initial writing of this plan rather than shoe-horned in to an existing plan after it is written.

- 3.1 Accountability System, Student Academic Growth (p. 23): I support the use of growth measures as part of accountability as they give districts and schools the opportunity to show they effect that their instruction is having on student learning. However, I see no way that the ISBE can use student growth as part of accountability without requiring some kind of uniform growth assessment in all schools across the state (and pay for that assessment). Attempting to make our current state assessments, attainment measures, work as growth measures, will be ineffective and provide inadequate data – since growth is not the purpose of these tests. In terms of the different models outlined, the hybrid seems to have the most value to the district and school in terms of usability of student data and data being used at the local level, if they choose to do so. It will not be comparable across districts because of the triangulation of data, nor will it be readily understood by the public (likely even with significant explanation), and therefore, shouldn't be used as a state-level accountability measure. The simple growth model will be easiest to understand.
- 3.1 Accountability System: Whatever the final model determined for the measures named above, there needs to be a way to ensure that students with disabilities are not the first to be blamed for a school's failure. I would rather see a dual attainment/growth system that used attainment for the majority of students but growth for students with disabilities – and perhaps for ELs as well. In addition, the calculation of graduation rates must be adjusted so that schools/districts are not penalized for students who access education until the day before their 22nd birthday.

Elizabeth deGruy, Ed.D.
Director of Special Education
Champaign Unit 4 School District
Mellon Administrative Center
703 South New Street
Champaign, Illinois 61820
Telephone: (217) 351-3841
FAX: (217) 351-3824

Thank you for your extensive outreach to the educational field. I attended the 12/1/16 meeting held as part of the Round Three Listening Tour and found the format, content, and presentation style to be very helpful for understanding the decisions that are being made in the development of Illinois' ESSA plan.

My comments, in brief, are these:

1. Please consider contracting with special education joint agreements, or cooperatives, to help provide professional development, technical assistance, and coaching on evidence-based practices for instruction, assessment, grant management, and service delivery. We are experienced at meeting the needs of students who have or are at-risk of disability and we make it a point to provide ongoing support to our member districts. I believe we could serve as "satellite offices" or contractual agents of ISBE while providing exceptional, outcome-based support districts in our regions.

LETTER TO DR. SMITH

2. A large, and growing, body of research supports the use of chronic absenteeism as a measure of school quality. The organization I lead is already providing resources and support to member districts in this area of student performance. This is a valid, meaningful outcome to measure.

3. Options for College and Career Readiness should include academic benchmarks/industry credential and behavioral or experiential benchmarks in order to allow all students (including those with disabilities or those who are not college-bound) to demonstrate readiness. I oversee vocational and transition services for students with disabilities and know that we provide the support necessary for students to achieve these benchmarks. This is also a highly meaningful outcome to measure but let's remember that career readiness is as important as college readiness when considering the needs of all students. Furthermore, college ready students will also benefit from career readiness experiences in high school.

Thank you,

Sheri Wernsing, Ed.D.
La Grange Area Department of Special Education
708.482.1151 Direct

Good Morning,

I attended the ESSA Listening Tour last night in Aurora, and wanted to share my remarks as well.

I would like to address "How the LEA will identify and address Disparities in Library resources."

- Library resources also include a certified school librarian as well as print and digital resources.

-As you are aware, in our state, there are some districts more fortunate than others to have a certified school librarian. It is vitally important that ALL students in ALL districts are afforded the same opportunity and have access to a certified school librarian.

-A certified school librarian is a highly qualified teacher who reaches **each and every** student in the **largest** classroom in the school.

Thank you for your time.

Sincerely,

Christine Barr
LMC Director
Fabyan Elementary School
630-444-8670
cbarr@geneva304.org
ILA Executive Board of Directors

**ISBE ESSA Implementation Listening Tour
Indian Prairie School District Crouse Education Center
December 1, 2016**

My name is Amy Lingafelter, and I have been a licensed school librarian at Joliet West High School, Joliet Township District 204, for 10 years. Before that, I was a licensed school librarian at Prairie School, Urbana District 116, for three years. I love being a school librarian, but before I tell you about some of the amazing things licensed school librarians do for schools, I'd like to note that I am a product of the public education system in Illinois. I attended Illinois public schools grades K-12, I have an Associates Degree from Joliet Junior College, a Bachelors from SIU Carbondale, and one of my Masters Degrees is from the University of Illinois Graduate School of Information Sciences. I fully realize that I *literally* get to go do a job I love every day *because* of teachers in the state of Illinois. I am the grown-up version of the students I teach now, and I want Illinois public schools to benefit them the way they benefitted me.

I'm thankful for this opportunity to tell you about how effective school library programs are directly related to student success. Like other highly qualified teachers, school librarians are enthusiastic about measuring all the ways we impact student growth. Our professional standards as outlined in the Illinois School Library Media Association's "Linking for Learning" provide both our curriculum guidelines and assessment goals. But librarians like to take "measurement" a step further. We tend to be very organized people with a love for numbers, statistics, and facts. We keep track of how well and how often we serve our communities, because it informs our best practices and helps us address student, teacher, and community needs. Librarians always know their numbers too, kind of how baseball players know exactly how many homeruns they have. For example: the Joliet West High School Library serves over 3000 students from a wide variety of backgrounds (we serve our hundreds of teachers, administrators, and other staff members, as well), and last year alone, these 3000 students collectively visited the library 49,500 times.

During those 49,500 visits, our students used their licensed school librarians and the library collection and space we curate to, among other things: learn and practice digital literacy skills, ask questions, get connected to the right reading material at the right time, fill out the FAFSA and college applications, put themselves in unfamiliar and challenging situations, fill out job applications, meet with college reps, collaborate with each other, pose questions on microphone to a discussion panel, make things by hand, listen to each other, recognize credible sources, register to vote, use Fitbits, meet with school administrators, attend poetry readings, get tutoring, take each other's blood pressure, and so on and so forth.

The state's ESSA plan recognizes that local education agencies will identify and address disparities in school library resources. "Resources" can seem like an intangible notion at times, but when it comes to school librarians, it's not. A licensed school librarian is one of the biggest resources any school can have. We are the resource, and we know the resources. We instruct all the students in a school, our classroom is everyone's classroom, and we are trained and qualified to teach the skills necessary to navigate digital media. We provide opportunity and ensure access for all students, and all the while, we run fully functional libraries that catalog, circulate, and interlibrary loan resources to patrons. Many school libraries across Illinois belong to library consortia that share catalogs and resources because we know how much these memberships expand equitable access to information for our students. My

LETTER TO DR. SMITH

students benefit from our membership in RAILS, the public and school library system of 1300 libraries in northern and western Illinois. Membership in a consortium is just one example of how licensed school librarians are trained to cultivate, enhance, and expand collections, and we do it with the end goal of producing a responsible citizen, a lifelong learner, and a problem solver who knows that when you have access to a Library, you have access to the whole world.

So as ISBE and the LEAs seek to define and **address disparities** in library resources across the state, I ask that the implementation of ESSA reflect the fact that **students attending a school without a licensed school librarian are at a disadvantage**, and that this in itself creates inequality within our state's public schools.

The Library is the heart of any school, and it should provide students with learning opportunities that don't just extend and enhance classroom learning; the School Library with a Licensed School Librarian does things for a school that the classroom alone cannot. I'm proud to join with other stakeholders in offering our feedback during this process. We know that the Illinois State Board of Education seeks to value our contributions in implementing ESSA, and reading the stories of the other dedicated professionals makes me extremely optimistic about what we are doing and where we are headed as a state.

Thank you,
Amy Lingafelter, M.L.S.
School Librarian

- Weighting of indicators in section # 3 – Accountability.

I really like the 51/49% model because I feel that it breaks each area of achievement into a small enough percentage of the overall measure as to feel "fair" and sends the impression that the school community is just as important as academic results. The academic achievement portions (17%) are broken up into small enough percentages as to be meaningful to an individual school.

However – my concern is that the math is complex and those who aren't familiar with using or reading multiple measures of success will be confused by the math. What will be done in order to make those numbers accessible to stakeholders looking at a school report card designed in this way? If we're aiming to do away with a system that "grades" schools we need a clear description of exactly what a 66.89 or a 57.02 means and where those numbers came from for those stakeholders who are reading these accountability reports.

Distinguished Scholar Designation:

Although I really appreciate that there are 4 "pathways" and that those pathways also include a variety of workplace and military experiences I have a couple of concerns. The first is that throughout the document the new rigorous Social Studies standards are mentioned as being part of a well-rounded

LETTER TO DR. SMITH

education but only math, reading, and standardized test scores along with vague “AP’ or “IB” designations are mentioned in the 4 pathways. The last 15 years’ overemphasis on math & reading has led to the near extinction of Social Studies education at many schools. 2 schools that I have worked at have eliminated all genuine Social Studies and Science instruction before the 8th grade. Other lower grades do lip service by “teaching” science or social studies by teaching literacy blocks all day where students occasionally read a non-fiction article about a science or social studies topic and then answer reading comprehension questions about it - but otherwise learn no content. So, as I have watched in the past 15 years – teaching meaningful Social Studies content has become all but extinct while concurrently our high school Science and Social Studies content teachers are struggling to provide years’ worth’s of background knowledge – that both they and the new Illinois State Standards are assuming that students already have. If we’re going to value a well-rounded education, unfortunately the lesson of NCLB is that if there is no accountability measure for a subject it isn’t going to be invested in – in neither time, teachers, resources, nor instruction. I encourage you to be less vague in the descriptions of the 4 pathways to include specific Science or Social Studies goals.

Secondly – who is reporting this data to ISBE? Will there be a form for administration to fill out asking for how many students are in Pathway A, B, C, and D? Will students who work be required to submit workplace forms from supervisors that will then be placed in their student files? Will schools be somehow negatively judged/compared to one another if most of their students are in Pathway D rather than Pathway A? My personal experience with teaching high school seniors in a low income urban setting is that my 17/18 year olds who go to school full time and work part time to pay their families’ rent, but have low GPA’s are in some cases more ready for college or career time-management demands than students with 4.0 GPAs who only have school to focus on.

My personal experience is that asking districts or schools to accumulate and sort and report even more data such as which students are in which pathway & having the paperwork to back it up will be burdensome paperwork. What accountability or oversight will there be to ensure districts report these numbers correctly and have the paperwork to prove how many students are in each of the 4 Pathways? I’m concerned because my district doesn’t even consistently fill out my years of service form correctly to ISBE every year and as a result my record on ISBE is incorrect. When I called ISBE to find out what can be done they assured me that only my district can correct this information (which they do not do). If filling out one check box with my name and years & grades taught isn’t happening correctly and there is no oversight over districts to ensure that they do that correctly – what will happen when we’re sorting hundreds or thousands of students into these 4 pathways to report at the end of the year?

Throughout –

Throughout the document there are multiple places where the phrase “ISBE will form a committee of experts on this topic” is used. Who are these experts? How does one get chosen? It is imperative for teachers from a diverse cross section of districts to serve on these committees. We can’t only have committees of “experts” made up of school administrators, theorists, and upper education professors who haven’t taught in years making these decisions. Many administrators state wide haven’t been in a classroom since before or during the beginnings of NCLB. In order to get effective expert advice on topics like meaningful professional development, IL-Empower vendors, ELL instruction, and non-academic indicators current teacher voice must be included in the committees of experts. One of the great strengths of this law is its requirement for educator voice – so let’s please be mindful of who the everyday educators in our classrooms are and consider them experts throughout this process.

LETTER TO DR. SMITH

Jennifer Hartmann

7/8th Grade Social Studies Teacher
UNO PFC Omar E. Torres Charter School
4248 W. 47th Street, 2nd Floor
Chicago, IL 60632

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LIBRARIAN

So many studies have shown that certified full-time librarians in schools k-12 increase learning as documented by test scores. These statistics apply no matter what the economic status of the student body. Yet the large majority of districts, when financial decisions are being made, do not view well staffed, well supplied librarians as a priority. I know of schools that pride themselves on the number of students they send off to college, yet are unwilling to provide the research tools and library skills needed to succeed in college.

I am a high school librarian. The vast majority of our students approach their first research papers with no background research skills. They don't know how to use a book's index, or even why it's a valuable tool. They don't know how to find books that the library has in its collection using a catalog. They don't know how to locate a book on the shelf. (Aside: I have observed that students who know how to use books for research are better at internet research.)

Internet research is accomplished by random Googling. Students don't know how to use a database assuming one is available to them. I even have worked with teen students who do not know how to use an encyclopedia.

Without elementary and middle school librarians, students arrive at high school with little or no library background. In high schools basic research skills have to be taught before moving on to the high school level. The materials students need, print and electronic, are limited. And for those schools with no librarians, collections quickly become disorganized and materials go missing; technology is often in disrepair or used for non-academic searches.

Please stop minimizing the value of a quality school library. Please stop relegating public school libraries and staff to the cuts column in the budget.

Sue Laubersheimer, Librarian
Lanphier High School
Springfield IL
217 525 3080 x236

"I have always imagined that Paradise will be a kind of library." **Jorge Luis Borges**

In any school district, regardless of how high achieving that district looks on paper, there will be economic disparities between students. There will always be students who will not have access to the resources that they need to succeed. This is where school libraries bridge that gap. School libraries are places where students have access to computers, books, and information. It is a place where they can go to receive the help and resources that they need.

LIBRARIAN

I have personally witnessed this on a daily basis. I work as a High School librarian. I open my doors at 7:15 a.m. There is always a line of students waiting to get in. They come to use the computers, access resources, research, ask questions, print, read, study, and work on homework.

I work in close collaboration with many Language Arts teachers in my building. I am given a copy of research projects and will pull books, have resources available, and create handouts for students to use. Luckily, I am still able to afford databases so I create student guides to help them navigate and find all of the resources that we have. Resources that are digital and in print. As a certified school librarian, I have the knowledge and skills necessary to guide students in their research.

I have assessed databases, bought resources, studied these resources, and took the time to educate and prepare myself to meet with students. Much like lesson planning, I study the resources I have in order to meet the needs of the students in my building.

Anyone can create a link on a website and point the students to it. I offer research classes for students where I show them how to find and use these resources. We talk about finding reliable resources, how to use these resources, and how to conduct research that builds off basic knowledge to analyze topics in-depth using our digital and print collection. These are conversations that happen all year long, in class, one-on-one, before and after school. As a librarian, I am available to help the students and answer their questions.

Without a certified school librarian, a library is just a room with books. The librarian is the person who brings the collection alive to students. Many of my conversations start with, "Let me show you this resource," or "Have you read this book?" I am not simply someone who checks out books, I am a living resource that is available to all students regardless of skill level, ability, income, background, gender, or any other issue faced by students in public school. The library is a place for everyone and has something for everyone. Every student deserves access to a qualified professional librarian to help them bridge the gap in learning, resources, and income. A person to introduce them to a world of knowledge that extends beyond the walls of the school, classroom and home.

Noel Clevenger
GHS Librarian
Glenwood High School

Good Morning,

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Thank you for your time.

Sincerely,

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LIBRARIAN

The state's ESSA plan recognizes that local education agencies will identify and address disparities in school library resources. "Resources" can seem like an intangible notion at times, but when it comes to school librarians, it's not. A licensed school librarian is one of the biggest resources any school can have. We are the resource, and we know the resources. We instruct all the students in a school, our classroom is everyone's classroom, and we are trained and qualified to teach the skills necessary to navigate digital media. We provide opportunity and ensure access for all students, and all the while, we run fully functional libraries that catalog, circulate, and interlibrary loan resources to patrons. Many school libraries across Illinois belong to library consortia that share catalogs and resources because we know how much these memberships expand equitable access to information for our students. My students benefit from our membership in RAILS, the public and school library system of 1300 libraries in northern and western Illinois. Membership in a consortium is just one example of how licensed school librarians are trained to cultivate, enhance, and expand collections, and we do it with the end goal of producing a responsible citizen, a lifelong learner, and a problem solver who knows that when you have access to a Library, you have access to the whole world.

So as ISBE and the LEAs seek to define and **address disparities** in library resources across the state, I ask that the implementation of ESSA reflect the fact that **students attending a school without a licensed school librarian are at a disadvantage**, and that this in itself creates inequality within our state's public schools.

The Library is the heart of any school, and it should provide students with learning opportunities that don't just extend and enhance classroom learning; the School Library with a Licensed School Librarian does things for a school that the classroom alone cannot. I'm proud to join with other stakeholders in offering our feedback during this process. We know that the Illinois State Board of Education seeks to value our contributions in implementing ESSA, and reading the stories of the other dedicated professionals makes me extremely optimistic about what we are doing and where we are headed as a state.

Thank you,
Amy Lingafelter, M.L.S.
School Librarian

LIBRARIANS

I have been going to the Wilmette public library ever since I was six years old. There are so many great opportunities and useful resources at the library. There's a librarian at every corner and is able to help. My family and I have become good friends with one of the librarians, Fred. He's always there for technical support.

Once my sister was approached by a mentally ill man and he was acting suspicious. My mother didn't notice the man but Fred did and confronted him asked him to leave. I feel safe in the environment knowing that there is protection.

- Isabelle H.

A story I would like to share is from a year ago,

I had just moved to Wilmette and didn't know anybody, the school or the way of teaching at school, I was extremely nervous, but the librarians at the New Trier Northfield campus were extremely helpful and made the transition so much easier. The librarians welcomed me from the start and made me feel comfortable in a new situation. From then on I asked the librarians for help if I didn't understand what I was taught, it was a place I could eat lunch and spend my free time, and it was such a beneficial resource to study or research and expand my learning. Its not right that some students don't have access to libraries or librarians, they have played such an important role in my life, and I cant imagine succeeding as who I am or as a student without them.

Thank you,
Bella Mendes

Dear Essa Committee,

I am an important asset to our school community, including students, staff and parents. Our school library is a revolving door each and every day, helping students to find books they love, learn information, explore genres, authors and series, and inspire each other to read, grow and learn. The best part of my job working with primary students is the excitement I see in their faces as they enter the library and as they leave proudly holding their book(s). I make learning fun and meaningful in our library and I am confident that I am helping to create lifelong readers and learners. The library is a place to celebrate books, literature, the writing process, authors, resources, information learning, exploration and so much more. My library lessons and resources provide wonderful opportunities to enhance classroom curriculum to meet standards. Library media specialists are highly effective teachers for every school community and are essential resources.

Katie Johnson

Library Teacher

Center School

Dear
Essa Committee

LIBRARIANS

*The difference between the right book and the almost-right book is the difference between **lighting** and the **lighting-bug**.*

This paraphrase from Mark Twain illustrates one of the many reasons why every child in Illinois deserves to have the services of a school librarian. Librarians are experts that have the training, experience, and job focus to identify and promote the books that have the power to brilliantly light the horizons of students and their teachers. This is not just an optimistic catchphrase.

As a recently retired high school librarian, I can attest that every librarian regularly hears students say, "I never thought I liked to read until you gave me this book. Do you have any more?" And librarians also hear teachers say, "That book you recommended really made my unit come alive for students!"

I am saddened that there are students in Illinois who do not have librarians to ignite the passion for reading in their schools. Students without librarians do not benefit from personalized reading suggestions, book clubs, author visits, book fairs, school-wide reading promotions, resources in other languages, books that motivate the gifted, books that nurture developing readers, summer reading partnerships with public libraries, and so much more.

How to Avoid Getting Conned by Fake News Sites, [CNET, 11/19/2016](#)

Everyone in Illinois wants students who can find, evaluate, and use information to make critical decisions. And while there is an abundance of news sites, not all of them are current, credible, and reliable. School librarians are the perfect teachers to ensure that information literacy instruction is an active part of the school curriculum. In Illinois' best schools, teams of classroom teachers from multiple grade levels and librarians work together to design lessons that enable students to practice these skills at each level of their development.

School librarians use their knowledge of the curriculum and available resources to purchase electronic research databases that accommodate the needs of all learners. Well-chosen electronic research databases cover a huge variety of subjects that have tools that assist students with reading development, citation, and contributing to collaborative learning. More importantly students become prepared to function in our connected, but often confusing, world.

Does the librarian really make a difference? A former student of mine shared his experience. He had just earned a master's degree in nursing and said, "Handling the medical research of intense nursing classes was easy for me because of the research lessons I had in high school. Other students struggled."

A school library is not just a place with books. A school library is a physical space that is enriched with technology and a huge collection of resources. Most importantly, a school library is headed by one or more certified librarians who ignite passions for reading and research.

Daniel Russo
3 North Jackson Street
Batavia, IL 60510

LIBRARIANS

Dear ESSA Board,

Hello my name is Hunter Binkley and I attend New Trier High School. I would like to tell you how Librarians have helped me throughout the years. Librarians have helped me with many research papers. When I needed help finding more information on a topic I had they would help me find books, papers, and websites that help. And the papers they have helped me with have had higher scores than the ones where I did the research by myself. Librarians have also helped me with technology. They help with finding a way that best presents your project. I know that I am very lucky to have a librarian that can speak fluent Spanish. During my day at school I am at least in the library once a day where I do homework and get help from a librarian. I think that every school should have a librarian. Volunteers can only help so much. Every school should be given access to a librarian. A librarian helps like a teacher, but does not give out grades like a teacher. This helps people have a special bond with a librarian, that could not occur with a teacher. If you were to go to a school without a librarian and ask a student what a librarian is they would say, it is a person who rents out books. If you ask a student who has a librarian they would say, is a friend who helps. Doesn't every school deserve a friend who helps?

Thank you,
Hunter Binkley

Dear
State Board of Education,

I want to inform you of how important it is to have a librarian in every school through-out Illinois. I have been to three different schools in the past year and a half. It has been very difficult adjusting and keeping up with curriculum and grades. The past two schools I attended there was not an official Librarian. Those schools were (KHS) Kansas High School and (PCHS) Paris Cooperative High School. Kansas can not find someone to fill the spot to keep up with the library and Paris Has a Librarian but she is gone three out of the five days during the week. This is hard for the students who need to check out books or ask for help finding them. They have almost, maybe six hundred kids or more which would make sense to keep class books in their library for fixing or to keep the teachers class clean and open. Space is an issue there due to books being in classrooms, books can also be lost easily due to no one really keeping up with them and keeping tabs. It would be more efficient to keep them in the library so the book would be almost guaranteed to come back. What I have said so far is broad and I just want you to know that there is so much more. I definitely enjoy reading and it was something I liked to do living in the past two previous places. I, Leah Boddy, would like your help to keep librarians in reach of students being deprived of becoming very knowledgeable. It is so important to read young. I had a very good teacher once tell me and some other fellow students it helps our concentration and we are supposed to read at this age to enforce understanding and I strongly believe that. I had went almost a full year without reading because I could not check out books or I was not given time to. Please help me and those other kids who I know may or may not care as much as I do or as they should!

Thank you,
Leah Boddy

RE: the importance of librarians in the 21st century

We are blessed at RTHS to have an experienced librarian with both a master's degree in library science and a master's degree in education.

LIBRARIANS

These faculty resources are truly invaluable. Students who do not have access to experienced librarians and adequate materials, both in book format and electronic format (databases) are at a true disadvantage. The importance of librarians and their media centers cannot be overstated.

In my Expository Writing classes, and in my Honors English I courses, students rely on the expertise of our experienced librarian, Mrs. Jenkins, in order to access their resources for their essays and research papers.

From libguides, to interlibrary loans, to fiction and nonfiction book projects, students use our library and know that they have an experienced library staff to help them in their research of both the latest (digital) and traditional (book) formats.

I have been teaching English writing and research courses for the past 25 years, and I can attest to the need for experienced librarians and materials as a need for educational equity.

"Education is the great equalizer." Librarians help ensure that ALL students have this kind of equal footing and ease of access to knowledge in this Age of Information.

Thank you for your time and consideration of these critical issues in education,
Mr. Welle
RTHS

LIBRARIANS

Licensed school librarians are highly effective because we connect students and teachers with information, literature and current and upcoming technology. We provide up to date information on improving life and assisting with broadening the horizons of students, teachers, the school community as well as the surrounding community. We promote collaboration between the school community and the surrounding community. We also enable students to think deeper and grow as citizens and learners. We inspire the community to be curious and want to learn.

Thank you,

--

Anne Thompson,

Librarian

Centennial School

708-364-3423

Dear ESSA Committee,

As a school librarian, I am an expert in literature for the children in my school. I am a resource for them and I work every day to make sure that they develop a love for books and reading. I understand how important a child's relationship with literature is and I strive to make connections between each child that walks into my library and the book they take home with them.

Not every child has people who will read with him or her at home or a shelf full of books in their bedroom. But when they come into the school library, they know that I will help them find a book that they can read themselves. I will provide them with a supportive environment in which they can enjoy reading and find books in which they will be represented. I will make it possible for them to take these books home and to share them with their peers. My training as a certified school librarians has taught me how to do these things, and so much more.

Having a school librarian means having someone who cares about your future as a reader and as a consumer of information. Not only do I provide each student with books that fit their reading level, I also show them how to access information in a responsible, ethical way. In this digital age, having

LIBRARIANS

someone who can provide this type of education – and who is an expert in teaching this information – is critical. As a licensed school librarian, I have received years of training on researching and locating information from unbiased and trustworthy sources using many kinds of new technologies. To allow someone other than a certified librarian to teach children skills such as these would be unethical and a waste of excellent resources.

Please understand the importance of a school librarian to the educational community. We support students and teachers alike and we should not be overlooked.

Thank you for your time.

Sincerely,

Caitlin Loizon, MLIS
Media Specialist
Meadow Ridge School
10959 W 159th St.
Orland Park, IL 60467
708.364.3661

Dear Essa Committee,

I am a library resource. I am not just a person to check out books.

I am resource to students. I assist in developing a love for reading, by creating and running reading programs, by talking about books, characters and authors. I create life goals for students by introducing them to authors and various career paths. I create opportunities to work with technology, such as circuit boards and robots; and then they checkout my books on circuit boards and robots!

LIBRARIANS

I am a resource to my staff. I collaborate in lessons, we communicate constantly to enrich lessons so that students gain more knowledge, experiences and self-worth. I find resources for teachers that they didn't know existed. I create opportunities for teachers to open their doors and allow students to call my space a classroom.

I am a resource to my community. I host parent nights. I teach parents about digital citizenship and online safety. I teach my students about digital citizenship and online safety. I take pride in the fact that I am responsible for the SEL goals in my school.

I am a resource. Books are not the only resource in a library.

Please remember my thoughts when considering the libraries and their worth in ESSA.

--

Sincerely,
Amy Hamernick
Media Specialist
Century Jr. High

@AhamernickCJH

@CenturyWildcats

Dear ESSA Committee-

As a certified School Library Media Specialist, I know firsthand how important school libraries are for students of all ages, and how crucial it is for my students to have a "highly effective" teacher librarian available full time.

Having a licensed school librarian is the only way to ensure that students are getting accurate, cutting edge, and up-to-date information and education regarding digital citizenship, information literacy skills, and technology skills. On top of this, we work hard to keep the most current literature on our shelves, and promote a love of reading day in and day out. We follow blogs, attend conferences, and read journals on topics most classroom teachers don't have time to delve into. This is what makes us highly effective and irreplaceable.

As learning continues to evolve, so do we, and because of this, I will continue to advocate for a certified

and licensed school librarian in each and every school in this state.

--

Kristy L. Gilbert

School Library Media Specialist

High Point School

14825 West Ave.

Orland Park, IL 60462

(708) 364-4412

<http://www.orland135.org/domain/156>

To Whom it May Concern:

The school I teach at, Jerling Jr. High, serves a diverse population of students. As a certified school media specialist, it is my job to both serve students in terms of library materials and services, as well as get to know them and teach them about their fundamental rights to information, and how to use the knowledge that they gain from print and electronic works to be citizens in our school, our community and within our democratic country. I treat all my students, regardless of their race, religion, socio-economic status, equally, and teach them daily that they must understand and advocate for themselves and the human race in being responsible users of information and by broadening their horizons through literature, digital devices and applications, and teamwork.

The Powerful Libraries Make Powerful Learners study from 2010 revealed that regardless of a school's socio-economic status, schools that were staffed with certified media specialists scored much higher on standardized tests in both reading and writing. To ignore this evidence, and to trivialize the importance of a certified teacher who will continually work with students on accessing, evaluating and using information would be a grave disservice to our children and teenagers, and drive yet another wedge between the haves and have-nots.

Thank you for your time,

--

LIBRARIANS

Lia Oldaker, Librarian

Jerling Junior High School

8851 W. 151st St.

Orland Park, IL 60462

708-364-3712

My newsfeed is full of reminders that adults don't know the difference between "real news" and "fake news" and I'm horrified that we have a generation of students in Illinois who aren't learning the difference either because they don't have a certified school librarian to teach them information literacy skills. My daughter is one of those students. Two years ago, the Casey-Westfield school district in Casey, Illinois, didn't replace their retiring certified school librarian. Instead they hired a paraprofessional, making minimum wage, and all she does is supervise study halls and check books in and out. She is NOT a librarian. She doesn't teach anything and she isn't HIGHLY EFFECTIVE.

I'm scared that no one is teaching my daughter how to access information efficiently and how to think critically about that information. I'm trying my best as a parent (and a certified school librarian) to teach her how to evaluate information and practice internet safety, but it's difficult when she is told at school that she doesn't need to cite her sources or use anything other than the first results on Google as her sources. It saddens me that she will be far behind her peers when she goes to college--she will have to catch-up to those students who have learned the I-SAIL standards (published by the Illinois School Library Media Association) from certified school librarians. Her writing and critical thinking skills won't be as strong.

I encourage you to include that all school districts have at least one certified school librarian--school librarians are highly effective teachers, too. The lack of this requirement is creating an equity gap that will be far-reaching in our state. Rural and urban schools need certified school librarians, too--they shouldn't be a privilege for the rich suburban schools. And those libraries need a line-item budget--depending on proceeds from private company book fairs does not count.

I'm sorry that I wasn't able to attend a listening tour in person this round, but I wanted to make sure that my voice was heard. Please make sure that southern and central Illinois students don't fall further behind.

Thank you,

Sarah Hill, Information Services Librarian

Lake Land College, Mattoon, Illinois

Young Adult Library Services Association (YALSA) President, 2016-2017

Twitter @glibrarian

Work Phone: 217.234.5440

Hello,

Below are my comments concerning ESSA and Qualified School Librarians.

I feel it is very important for all students in the state of Illinois to have access to equitable school library resources. This equitable access should include a licensed school librarian, who is qualified to provide a well-rounded education for all students. A highly effective teacher is a highly effective licensed school librarian. As my own experience as a licensed school librarian, I know the state and school standards, and I am able to help both students and teachers with the needs they have. A school librarian builds a love for reading in students, which fosters a love for school, and therefore increased achievement.

My focus on students is to build the Whole Child:

Like all educators in Illinois, school librarians are concerned with the development of the Whole Child. As ISBE considers policies and funding formulas across the wide spectrum of ESSA Implementation, we'd like to remind you that:

- School Libraries promote and encourage well rounded, collaborative, lifelong learners.
- The Library is the largest classroom in the school allowing children to explore interests, problem solve, and build information literacy skills.
- Licensed School librarians provide a wide variety of programs for students to participate.
- Licensed School Librarians are trained to select high quality materials and literature that support student interest as well as Common Core.
- Librarians are equipped to help students navigate digital media and become socially responsible users of information in our fast- paced world.
- Licensed school librarians help to foster an appreciation of literature, and a love of reading in our students.

To help comprehensively address the academic and socio-emotional life of the child, school librarians across the state recommend that ISBE include the Illinois School Library Media Associations 'Linking for Learning' standards formally in the state ESSA Plan. Linking for Learning was first passed by the General Assembly in 1993 and is updated every 5 years. These guidelines include the current and robust standards by which all Illinois school libraries can and should measure themselves. ISLMA is in the process of conducting our next scheduled comprehensive review and update of Linking for Learning to be published in 2017. We encourage ISBE to integrate these standards for school libraries into the MTSS approach.

Thank You,

LIBRARIANS

Mark Melka

LRC Director | Schiesher Elementary School

mmelka@lisle202.org | 630-493-8160

www.TateSES.weebly.com | [@SESLRCLisle202](https://www.instagram.com/SESLRCLisle202)

I wanted to let you know that our librarian, Mrs. Ann Marie Jenkins, at Rochelle Township High School goes above and beyond the call of duty. She plans book talks and literary circles for our classes. She sets up LibGuides and selects links to databases that would help students when researching for essays or speeches. She pulls carts of books that would cover topics that apply to what we are studying in class. She is an asset to our school.

Thank you,

Jodi Hill

To whom it may concern,

As a teacher at Rochelle Township High School, I have learned that the ISBE may not choose to include school libraries and Library professionals in its final ESSA plan. In my professional opinion this would be a huge mistake and would be at the detriment of all students and staff at Rochelle Township High School.

As a teacher, I have been given the opportunity to collaborate with our Librarian to create Cross Curricular Units for My math students and have participated in reading challenges with students and other staff members. These activities have allowed me to expand my classroom beyond simply teaching math instruction and reach a greater number of students in accordance with their learning styles/preferences. Our Librarian and Library Aide work tirelessly to provide the students at RTHS with relevant material, and go above and beyond their duties every single day. They have a passion for making our school better, and help ignite that same passion and a love of reading in our students and staff at RTHS.

It is my hope, for the sake of my students, that you would consider including school libraries and Library professionals in the final ESSA plan.

Thank you for your time and consideration!

Mrs. Erin Bergeson

Special Educator/ Case Manager

Student Council Advisor

LIBRARIANS

Rochelle Township High School

(815) 562-4161 x4227

Good afternoon,

Please consider the following regarding ESSA.

1. For the Illinois College and Career Ready Framework, readiness should read "academic indicators OR standardized testing" and not "academic indicators AND standardized testing." By including the AND instead of the OR, it goes against the recommendations set forth by Redefining Ready and creates an unrealistic metric. We do not fear accountability but advocate for realistic and rigorous metrics. Redefining Ready has set forth a realistic and rigorous framework.
2. For the accountability assessment, those districts utilizing a standards aligned and nationally normed assessment (such as MAP) should be able to use that assessment instead of PARCC. This will allow for increased instruction time while still providing a normative assessment as part of a balanced assessment system. The past two years of PARCC assessments have been extremely time consuming and a disruption to the school environment and classroom instruction.

Thank you for your time.

--

Dusti E. Adrian, Ed.D.
Principal, John Deere Middle School

#SpartanPride #JDMSLivingtoLearn #Movin'onUp

2035 11th Street
Moline, IL 61

Hi

The following is input on the CCR Designation (students would complete one of the following pathways):

This was interesting to review. I think there are some good ideas here. Below are also a number of observations and suggestions.

1. It is recommended that the Pathway terminology be changed to options or designations. How we use the term Pathways for Programs of Study that will lead to high skill, high wage and high demand occupations is very different than what this example is expressing. It is felt that this is sending a mix message and will be confusing.
2. Pathway A – With only academic indicators and no behavioral, how can a student be ready for college or a career? A student could perform well on the assessments, yet they could be absent from school and still could get this designation. How can they be career ready without any indicator? Consideration should be given to eliminating this one and only having the other 3.

MISCELLANEOUS

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Dave

Last Name: Spankroy

Email: Fourjaads@comcast.net

Comments: Eliminate common core.

Thank you.

Hello,

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Lisa

Last Name: Hichens

Email: lisa.hichens@bps101.net

Comments: State Board of Education,

Thank you for soliciting feedback of the Every Student Succeeds Act (ESSA) proposal that the State of Illinois will submit to the Department of Education. Serving the varying needs of our diverse state is not easy.

Please accept this feedback on behalf of the administration who serves the 6000 students in Batavia Public Schools D101.

Concern 1

While both the State's goals and proposed accountability system are improvements from the NCLB mandates, it is a concern that the goals of the State and the accountability system are not aligned. This may result in duplicated work, inefficient improvement efforts, and a lack of focus. Please consider aligning the goals and accountability systems that are reflected in the proposal.

Concern 2

Using growth data is an important element of the plan and one that best serves the needs of students, no matter their academic proficiency. From the draft plan, it seems that growth will be based on the same metric that is used to gauge proficiency, PARCC. For growth, we suggest allowing for districts to submit their own growth data from correlated assessments such as NWEA's MAP assessment. This would allow for more frequent measure to take place to guide improvement efforts. Allowing assessment flexibility to show growth would adapt to the varying needs of districts and allow for continuous improvement efforts without burdening the State with further assessment costs.

Concern 3

The use of English Learners in the accountability system is important to address the needs of this sub-population but the metric is distorted for districts like Batavia that have small programs. Using EL student performance as a part of a larger metric of underperforming students might be more advantageous to the State's plan. Our district has focused our efforts on those students who score below the 30th percentile rather than using demographic labels. Sub groups determined by an arbitrary number (20) seem to be more aligned to NCLB than the spirit of ESSA.

Concern 4

If high school graduation rate is included in these metrics then different rules need to be developed to account for students that need 18-22 year-old programming. Currently, these students count against our District on this measure.

Advocacy 1

Our District administration believes that the 51/49% accountability formula is the most whole-child way to measure a District's and school's performance.

Advocacy 2

Our District administration believes the pathways model will best serve students and spur positive growth for our high school students.

We encourage you to resist the feedback that protects certain programs and certain staff and allow Districts to best determine where to allocate resources to meet the goals.

Thank you for taking for soliciting our feedback.

Sincerely,

MISCELLANEOUS

Dr. Lisa Hichens, Superintendent
Dr. Brad Newkirk, Chief Academic Officer
Dr. JoAnne Smith, High School Principal
Dr. Kelley Karnick, Curriculum Director

Thank you.

MISCELLANEOUS

RE: ESSA

To Whom It May Concern,

Many problems with our Illinois school system is a lack of accountability for teacher performance and lack of training in professional, ethical conduct of school administrators. Segregating students with disabilities and race is also a problem. ISBE's current policies and rules do not adequately enforce laws when formal complaints are filed against public school districts; local school districts operate under no authority. The outcomes resulting from formal complaints need to produce a result that promotes a real change in both the professional and ethical conduct of educators and administrators. Who at ISBE is examining educational models implemented in other states that have shown growth, have been financially stable, and where education professionals remain in practice based upon their performance and community approval rating? As an Illinois residents we continue to hear of a lack of funding at both local and state levels. This is difficult to accept as an excuse because we pay significantly more in taxes than most all states. Approximately 2/3 of our property taxes go to our school districts and misuse of school funding at local levels is publicized without any recognition from a governing agency. Professional training will not help to remedy these core problems.

Thank You

Hello,

I attended the Listening Tour hearing in Galesburg today. While I was able to ask Jason Helfer about how IL's ESSA state implementation plan may address providing advanced learning opportunities to K-8 students, in order to allow them access to advanced coursework in high school, I had prepared testimony to share. The format of this listening session was geared to more of a question/answer format, so I did not give my complete testimony. I have included my prepared comments below:

Thank you for inviting us to speak today. My name is Kristen McElligatt. I am a retired educator and administrator from IL's public school system. I've worked in the Chicago suburban area and completed my career in public education in Peoria. I am currently an adjunct faculty at Bradley supervising student teachers. I am also an active member of the Illinois Association for Gifted Children (IAGC) and a Past President of that organization.

First, I'd like to comment on the Accountability System development. IL needs a growth model that holds all schools accountable for individual student growth, including students who are already at or above the proficiency designation.

This is an equity issue. Student potential exists in every community, but access to opportunities and resources to develop that potential are highly inequitable. IL has large opportunity gaps and therefore, large excellence gaps between economically disadvantaged and non-disadvantaged students. This gap is more evident since IL eliminated funding for gifted grants in 2003. Now only a small percentage of IL school districts provide any services to highly able students. Those that do tend to be in the more affluent districts. I have worked in two of the districts cited in the 2016 report, Untapped Potential, put forth by One Chance Illinois. (Wheeling District 21 and PSD 150) where these opportunity and excellence

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gaps exist. ISBE, through the ESSA implementation plan, can work to decrease these gaps that impinge on low-income/high poverty students' civil rights to accessing challenging curriculum.

This is a much broader issue than serving identified gifted students— rather, it is an opportunity for IL to effectively and comprehensively advocate for high ability and high potential students.

IL needs to adopt a growth model that supports growth of all students rather than a “growth-to-proficiency model” that would put a focus on students below proficiency

Why? 1/3 of IL students are already performing at the proficient level or higher as documented in our state data. Every student deserves to be challenged, but thousands of students will be ignored in a growth-to-proficiency model. How are we accountable for these students' growth? How do we ensure that students who are already proficient learn and grow over the course of a school year?

In addition, ISBE's Draft 2 school quality indicators focus heavily on high school outcomes. Waiting to increase access in high school is too late. IL needs to address the whole K-8 pipeline, as college readiness and high achievement starts early. In ISBE's Draft 2, there are provisions for expanding access to online AP courses and dual enrollment — but that only serves students in their last 2-3 years of high school. We need opportunities for schools to offer talent development opportunities and advanced coursework in grades K-8 as well.

Bright disadvantaged students who go underserved for their first 8-10 yrs of school will not be those who can take advantage of the opportunities (AP/advanced coursework) noted in Draft 2. Evanston School District 65, with their partnership with Northwestern University, has a successful 12 year track record of tapping potential beginning in elementary grades to increase student opportunities in high school. For additional information, see the attached document, Project+Excite.pdf.

Here are some other resources you may find helpful in your future work:

NAGC ESSA Resources: <http://www.nagc.org/get-involved/advocate-high-ability-learners/nagc-advocacy/federal-legislative-update/every-student>

IAGC general ESSA implementation Recommendations (Prior to release of ISBE Draft 1):
<https://docs.google.com/document/d/1tEpLxQeAI7rKq7yeOKf-rU8sMzNWjbUhjbKZifoEk2U/edit>

IAGC detailed comments on ISBE ESSA Implementation Draft Plan #1:
<https://docs.google.com/document/d/1TIJ4PTKLBf7Vy1qJ1mJOtCAX0ATUUjmQMyHkUeEwqnc/edit?usp=sharing>

Do not hesitate to contact me if I can be of any assistance.

Sincerely,
Kristen McElligatt
3518 N Knoxville Ave
Peoria, IL 61603
[847-312-4913](tel:847-312-4913)

MISCELLANEOUS

Dear Gil,

It was a pleasure speaking to you yesterday regarding my concern for my son , Peter, who is a misidentified ELL student. I am relieved and thankful that I am being heard and that the Division of English Language Learners is making an attempt to help those who have been placed incorrectly.

My recommendations to prevent and help misidentification of students are:

1. Provide an exit from the yearly ACCESS testing if a student is misidentified as an EL student.
2. Provide an exit from the ELL Program if misidentified
3. Re-screen students at any time if a parent, teacher, special education team, believe that a student is misidentified as an ELL student
4. Provide for a safeguard to prevent misidentification of ELL students: such as yearly re-screening, required documented yearly collaboration between speech & language pathologists, teachers, parents, and/or healthcare providers
5. Provide parents with the option to EXIT the ELL program AND the ACCESS testing if that is their wish or desire.

I also provided these recommendations on October 5, 2016 to essa@isbe.net . I hope they have been reviewed and they are being considered.

Thank you so much for your interest and effort to help my son in this situation. My family is greatly appreciative to you for that. Please keep in contact with me to update me with the progress you obtain for all of the students in this predicament.

Happy Holidays!

Loula Dimas
847-965-8661

Dec. 1, 2016

ISBE Listening Tour on ESSA STATE PLAN

Viewing the ESSA document I have questions regarding accommodations for students with disabilities. The world is full of examples of accommodations that permit people with disabilities to perform specific tasks they might not otherwise be able to do.

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Accommodations play an important role in educational settings too, particularly for students whose Disability interfere with performing learning tasks (such as reading a book, taking notes in class, Or writing an essay) or testing tasks (such as getting through the items within the time limit or Filling in the circles on a multiple chose test). A critical part of teaching and assessing students With disabilities, such as a learning disability or the English Language Learning student, is providing them with accommodations that support learning and that support their ability to show what they know and can do. There are different types of accommodations.

Presentation accommodations: Students with print disabilities defined as difficulty or inability to Visually read standard print because of a physical, sensory or cognitive disability.

Response Accommodations: Students with physical, sensory or learning disabilities (Including difficulties with memory, sequencing, directionality, alignment and organization).

Timing and Scheduling Accommodations: Students who need more time, cannot concentrate for extended periods, have health-related disabilities, fatigue easily, special diet and/or medication needs.

Setting Accommodations: Students who are easily distracted in large group settings, Concentrate best in small groups.

One accommodation for ELL students that Illinois is failing to provide in many instances is **A qualified bilingual interpreter**. . EL parents of children with disabilities become effectively foreclosed from meaningful participation in the education process in the absence of qualified, competent and well trained bilingual interpreters.

Thank you, and if I can be of further assistance, please contact me at LDA/IL 708-430-7532 Penny Richards, Board Learning Disabilities Association of Illinois www.LDAIL.org

THIRD STATEWIDE LISTENING TOUR TO GATHER FEEDBACK ON ESSA STATE PLAN

December 6, 2016

Chicago Public Schools - Austin HS 5610 West Lake Street, Chicago, Illinois

Submitted to ISBE Melina Wright, ESSA, Chapter #1

Review of the ISBE document from the second statewide listening tour on the ESSA State Plan, September 2016, suggested that the following information was missing:

1. Transition assessments for ENGLISH LEARNERS WITH DISABILITIES beginning at 14 years of age in grammar school and assessments for EL students with IEPs graduating from high school. This assessment is required for students with significant disabilities, for students with moderate disabilities, and for students with IEPs whose disabilities need modifications in 2 or 4 year college programs.
2. During the last four years many parents complained over and over again that their EL children had graduated without an appropriate IEP that can be utilized to program the EL student into an accepting college. However. this then became a significant hardship to parents when the graduating high school sent the student for a vocational assessment to a private provider who charges between \$2,000. and \$3,000. for the assessment.
4. School districts throughout Illinois do not provide highly qualified bilingual special education interpreters to provide IEP information to parents whose primary language is other than English and who have children with disabilities. Such trained and qualified

MISCELLANEOUS

interpreters are to be used exclusively for IEP conferences.

Please review IDEA, ILLINOIS RULES AND REGULATIONS FOR SPECIAL EDUCATION,
RULES AND REGULATIONS FOR BILINGUAL EDUCATION, COURT CASES.
San Francisco's Judge Ruling (2015).
Office of Civil Rights (2014, 2015, 2016).

Respectfully submitted by,
Julieta Rosales Pasko, NCSP
Bilingual School Psychologist
Learning Disabilities Association of Illinois Vice-President
Parents Helping Parents, Latino Parent Group with Children with Disabilities
F.E. Familias Especiales, (Special Families)
Probono advocate for EL students with disabilities and their parents.

Dear ISBE,

Thank you for the opportunity to comment on Draft #2 of our ESSA plan.

On page 22 under academic indicators there are six indicators listed. Due to the size of my school district my students will only be able to possibly meet 3 of the indicators. We do not have advanced placement or IB courses. How will this disparity be taken into account for the many schools across Illinois that are in a similar situation as mine?

Pages 23 - 36 contains a lot of information regarding student growth. Over the last two years my school district has created a student growth plan as it relates to PERA. Does the plan contained in this document conform to the requirements of PERA? If not, does this mean we will have to dismantle 2 plus years of work? I understand that PERA is an Illinois law, but it would be nice if our federal plan and current Illinois worked in unison.

I have a very diverse school district. We have at least 20 different languages spoken by our students and some language with very different dialects. In addition, I have a substantial number of students that live in extreme poverty. How does our ESSA plan take these variable into consideration?

Again, thank you for the opportunity to comment on this plan.

Professionally,

--

Ed Fletcher, Superintendent
Monmouth-Roseville CUSD #238
105 North E Street
Monmouth, IL 61462
(309)734-4712

Good morning,

MISCELLANEOUS

Please find below comments on Draft #2 of Illinois' ESSA Plan. Thank you.

- 1.2.A; Plan Coordination (p. 7): I am concerned with and oppose, the idea that the ISBE will “contemplate the most appropriate ways to braid funding.” The example citing IDEA Parts B and D funding in the following paragraph may have allowed Illinois to support its statewide MTSS system, but it has also siphoned from students with disabilities money that should be dedicated to special education. I oppose any braiding of funds if the result is erosion of dedicated funds for students with disabilities.
- 2.2 Academic Assessments (p. 10-11): The current options of DLM or PARCC/SAT are too restrictive for students with disabilities. There are many students with disabilities who do not meet the significant cognitive disability requirement suggested for DLM participation, but who also are not able to participate extensively in the general curriculum or PARCC/SAT option, even with appropriate accommodations. If students do not have access to or meaningful participation in the general education curriculum, it is not appropriate to test them on the curriculum. This also does not give meaningful information to the state or district in terms of how the student's education is benefitting him/her nor does it provide the teacher with meaningful information to help inform instruction. I also disagree with the use of an assessment which will not provide the accommodations which the student needs and are determined by the IEP team; SAT determines accommodations outside of the IEP process.
- 3.1 Accountability System, Illinois College and Career Ready Indicator Framework (p. 20-): I am concerned about both the initial plan for the indicators as well as the proposed pathways and they relate to students with disabilities. Students with disabilities must be considered in the initial writing of this plan rather than shoe-horned in to an existing plan after it is written.
- 3.1 Accountability System, Student Academic Growth (p. 23): I support the use of growth measures as part of accountability as they give districts and schools the opportunity to show they effect that their instruction is having on student learning. However, I see no way that the ISBE can use student growth as part of accountability without requiring some kind of uniform growth assessment in all schools across the state (and pay for that assessment). Attempting to make our current state assessments, attainment measures, work as growth measures, will be ineffective and provide inadequate data – since growth is not the purpose of these tests. In terms of the different models outlined, the hybrid seems to have the most value to the district and school in terms of usability of student data and data being used at the local level, if they choose to do so. It will not be comparable across districts because of the triangulation of data, nor will it be readily understood by the public (likely even with significant explanation), and therefore, shouldn't be used as a state-level accountability measure. The simple growth model will be easiest to understand.
- 3.1 Accountability System: Whatever the final model determined for the measures named above, there needs to be a way to ensure that students with disabilities are not the first to be blamed for a school's failure. I would rather see a dual attainment/growth system that used attainment for the majority of students but growth for students with disabilities – and perhaps for ELs as well. In addition, the calculation of graduation rates must be adjusted so that schools/districts are not penalized for students who access education until the day before their 22nd birthday.

Elizabeth deGruy, Ed.D.
Director of Special Education
Champaign Unit 4 School District
Mellon Administrative Center
703 South New Street

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Telephone: (217) 351-3841
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Thank you for your extensive outreach to the educational field. I attended the 12/1/16 meeting held as part of the Round Three Listening Tour and found the format, content, and presentation style to be very helpful for understanding the decisions that are being made in the development of Illinois' ESSA plan.

My comments, in brief, are these:

1. Please consider contracting with special education joint agreements, or cooperatives, to help provide professional development, technical assistance, and coaching on evidence-based practices for instruction, assessment, grant management, and service delivery. We are experienced at meeting the needs of students who have or are at-risk of disability and we make it a point to provide ongoing support to our member districts. I believe we could serve as "satellite offices" or contractual agents of ISBE while providing exceptional, outcome-based support districts in our regions.
2. A large, and growing, body of research supports the use of chronic absenteeism as a measure of school quality. The organization I lead is already providing resources and support to member districts in this area of student performance. This is a valid, meaningful outcome to measure.
3. Options for College and Career Readiness should include academic benchmarks/industry credential and behavioral or experiential benchmarks in order to allow all students (including those with disabilities or those who are not college-bound) to demonstrate readiness. I oversee vocational and transition services for students with disabilities and know that we provide the support necessary for students to achieve these benchmarks. This is also a highly meaningful outcome to measure but let's remember that career readiness is as important as college readiness when considering the needs of all students. Furthermore, college ready students will also benefit from career readiness experiences in high school.

Thank you,

Sheri Wernsing, Ed.D.
La Grange Area Department of Special Education
708.482.1151 Direct

- Weighting of indicators in section # 3 – Accountability.

I really like the 51/49% model because I feel that it breaks each area of achievement into a small enough percentage of the overall measure as to feel "fair" and sends the impression that the school community is just as important as academic results. The academic achievement portions (17%) are broken up into small enough percentages as to be meaningful to an individual school.

However – my concern is that the math is complex and those who aren't familiar with using or reading multiple measures of success will be confused by the math. What will be done in order to make those numbers accessible to stakeholders looking at a school report card designed in this way? If we're aiming to do away with a system that "grades" schools we need a clear description of exactly what a 66.89 or a

57.02 means and where those numbers came from for those stakeholders who are reading these accountability reports.

Distinguished Scholar Designation:

Although I really appreciate that there are 4 “pathways” and that those pathways also include a variety of workplace and military experiences I have a couple of concerns. The first is that throughout the document the new rigorous Social Studies standards are mentioned as being part of a well-rounded education but only math, reading, and standardized test scores along with vague “AP’ or “IB” designations are mentioned in the 4 pathways. The last 15 years’ overemphasis on math & reading has led to the near extinction of Social Studies education at many schools. 2 schools that I have worked at have eliminated all genuine Social Studies and Science instruction before the 8th grade. Other lower grades do lip service by “teaching” science or social studies by teaching literacy blocks all day where students occasionally read a non-fiction article about a science or social studies topic and then answer reading comprehension questions about it - but otherwise learn no content. So, as I have watched in the past 15 years – teaching meaningful Social Studies content has become all but extinct while concurrently our high school Science and Social Studies content teachers are struggling to provide years’ worth’s of background knowledge – that both they and the new Illinois State Standards are assuming that students already have. If we’re going to value a well-rounded education, unfortunately the lesson of NCLB is that if there is no accountability measure for a subject it isn’t going to be invested in – in neither time, teachers, resources, nor instruction. I encourage you to be less vague in the descriptions of the 4 pathways to include specific Science or Social Studies goals.

Secondly – who is reporting this data to ISBE? Will there be a form for administration to fill out asking for how many students are in Pathway A, B, C, and D? Will students who work be required to submit workplace forms from supervisors that will then be placed in their student files? Will schools be somehow negatively judged/compared to one another if most of their students are in Pathway D rather than Pathway A? My personal experience with teaching high school seniors in a low income urban setting is that my 17/18 year olds who go to school full time and work part time to pay their families’ rent, but have low GPA’s are in some cases more ready for college or career time-management demands than students with 4.0 GPAs who only have school to focus on.

My personal experience is that asking districts or schools to accumulate and sort and report even more data such as which students are in which pathway & having the paperwork to back it up will be burdensome paperwork. What accountability or oversight will there be to ensure districts report these numbers correctly and have the paperwork to prove how many students are in each of the 4 Pathways? I’m concerned because my district doesn’t even consistently fill out my years of service form correctly to ISBE every year and as a result my record on ISBE is incorrect. When I called ISBE to find out what can be done they assured me that only my district can correct this information (which they do not do). If filling out one check box with my name and years & grades taught isn’t happening correctly and there is no oversight over districts to ensure that they do that correctly – what will happen when we’re sorting hundreds or thousands of students into these 4 pathways to report at the end of the year?

Throughout –

Throughout the document there are multiple places where the phrase “ISBE will form a committee of experts on this topic” is used. Who are these experts? How does one get chosen? It is imperative for teachers from a diverse cross section of districts to serve on these committees. We can’t only have

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committees of “experts” made up of school administrators, theorists, and upper education professors who haven’t taught in years making these decisions. Many administrators state wide haven’t been in a classroom since before or during the beginnings of NCLB. In order to get effective expert advice on topics like meaningful professional development, IL-Empower vendors, ELL instruction, and non-academic indicators current teacher voice must be included in the committees of experts. One of the great strengths of this law is its requirement for educator voice – so let’s please be mindful of who the everyday educators in our classrooms are and consider them experts throughout this process.

Jennifer Hartmann

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Dear Dr. Smith:

Thank you for the opportunity to submit comments on the Illinois ESSA State Plan. I am a community member and a member of Stand for Children. I hope you will consider the following suggestions to strengthen your next draft:

- Weight growth heavily so that schools that are driving learning gains despite socioeconomic challenges are rewarded for that success.
- We feel that each subgroup should be given equal weight within each indicator. With all subgroups equally weighted, this reduces the risk that certain student populations may be supported disproportionately. Lastly, this method is straightforward in calculation and easily compared across states and districts.
- Add PSAT in high school so we have a growth measure for our high school students.
- Prioritize diverse educator pipelines by funding the Diverse Educator Exchange.
- Summative scores should be parent-friendly so that they may understand the quality of their child's school, they should also align, or in some way correlate to federal summative scoring methods for consistency

Thank you again and I look forward to seeing the next version of the plan.

Sincerely,

Savitri Boodram

Dear Dr. Smith,

Thank you for the opportunity to submit comments on the Illinois ESSA State Plan.

I am the parent of two Chicago public school students, currently in first and third grades. I have served two terms on my neighborhood public school's Local School Council and have been an active member of Stand for Children since they came to Illinois. I also served as a Title I PAC chair last year and have spent the last five years learning about school funding, school ratings, and meeting students and parents from all corners of Chicago. I am proud to be a life-long learner with professional degrees in architecture from both the University of Michigan and Harvard.

Having been a parent at a school that was not recognized as a quality school because the ratings weighted proficiency over growth, I would like your ESSA plan to weight growth as heavily as possible. I watched children from disadvantaged backgrounds make great strides but until the discussion moved from proficiency to growth neither the students nor the teachers were truly able to celebrate their amazing work. If we don't give greater credence to growth metrics we will be doing a disservice to these

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students and their schools, not to mention students at good-enough schools who just aren't being challenged.

In each decision you make, please prioritize equity. By that I mean please choose metrics that will amplify the progress our students make and how well their teachers engage them, versus those metrics that will simply illustrate the socio-economic differences between schools. Weight subgroups heavily so that no student is left to fail.

And finally, please prioritize diverse educator pipelines by funding the Diverse Educator Exchange so that more of our students can have teachers who both do and don't look like them. All of our students in Illinois will benefit from having a diverse pool of high-quality teachers.

Sincerely,
Lisa Kulisek
Parent and Stand for Children member
Chicago, Illinois

Dear ISBE,

The following points are feedback on the State's ESSA Draft #2 Plan.

1. Weighting of Indicators
 - Our district strongly believes that Academic Attainment must continue to be valued such that no formula should result in a high performing district receiving a lower overall score than a lower performing district. On page 36 of the plan, three hypothetical schools are compared. School B has 90% of its students meeting expectations on the state test (PARCC). Under the 51/49 plan, School B has a lower overall score than School A, which has 76% of students meeting expectations on the state test. We do not find the 51/49 plan acceptable, nor any other iteration that would result in the same outcome. Although we recognize the desire to emphasize growth, we can't lose sight of the overall mission of having as many students as possible meet the academic standards as measured through PARCC.
 - The amount of weight placed on the EL subgroup is highly concerning for districts with a small EL population. In the examples provided, the lowest weighting is 17%. However, there are districts, such as ours, that have a much lower percentage of EL students. In this situation, the EL population is weighted too heavily and is not represented proportionally to what it is in the actual district. Additionally, much more information is needed regarding the data used to determine EL proficiency. At a listening session, it was suggested that a combination of attainment and growth would be used.
2. Academic Growth
 - Three of the four models proposed in the plan have high levels of error associated with them. Because the hybrid model is not outlined yet, the amount of error is unknown. It is highly troubling to think that schools and districts will be evaluated on growth given the high level of error with this measurement. We suggest that whatever growth model is used, the level of error must be considered carefully. Students should be given the "benefit of the doubt" if their score is on a margin.
 - We question the application of growth if a district is high performing. We suggest that if a district is meeting the State's long-term proficiency goals (currently 90% or more of third graders reading at or above grade level, etc.), growth should not be a data point included in the evaluation of the district/school.

3. Additional Indicators

- "8th Grade on Track" is listed on page 32 of the plan. We would like to see more information on how the statistic is derived.
- School Climate: We do not support the use of the 5 Essentials Survey as many questions are posed in ways that do not necessarily yield accurate results. For example, our district uses Curriculum Coordinators who have extensive responsibility for instructional leadership. The Coordinators support the teachers and principals. The survey does not address this type of staffing; thus, instructional-related questions on the survey assume the principal facilitates learning and discussions that our coordinators do. We conduct our own survey bi-annually and keep nationally benchmarked data. We are also able to create custom questions that address the specific ways our district functions. For all these reasons, we would be very concerned if the 5 Essentials was used as means for measuring School Climate.

4. Long Term Goals

- All Kindergarteners are assessed for readiness: Although it is not specifically listed, we are not supportive of the KIDS Assessment mandate. Although the assessment contains some very good components, we do not believe every district in Illinois should be required to use the KIDS Assessment. Furthermore, we find it very troubling that the State is collecting teacher-reported data on individual students. The data will not have any type of inter-rater reliability. We would not support the KIDS Assessment being part of the School Success Indicators.
- 90% of 3rd graders reading at grade level and 90% of fifth graders meet/exceed expectations in math: We suggest that the State examine the PARCC data of the top 5% schools across Illinois. Our PARCC data from the State does not indicate that even the top 5% of schools are meeting the outlined expectation. However, we believe the State would be challenged to say that those particular schools are failing students, not preparing students for college and careers, or meeting general expectations. Although it may not be politically palatable, the 90% benchmark is unrealistic. It's disheartening to start with an unrealistic benchmark. We encourage the State to reconsider the benchmark and use real PARCC data to create an appropriate benchmark.

Thank you for your time and the opportunity to submit feedback. I recognize that the construction of the State plan is an arduous and difficult process.

Sincerely,

Katharine Olson, Ed.D.

Assistant Superintendent for Curriculum, Instruction, and Assessment

Northbrook School District 27

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Northbrook, IL 60061

www.nb27.org

Direct Line: 846-205-4935

Dear ESSA Committee—

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The Illinois Speech-Language-Hearing Association, which represents approximately 2000 speech-language pathologists (SLPs) and audiologists in the state of Illinois, has been monitoring the development of Illinois' draft plan to implement the Every Student Succeeds Act. SLPs and audiologists are recognized in the new Every Student Succeeds Act under the term Specialized Instructional Support Personnel.

ISHA desires to ensure that SLPs and audiologists are included in opportunities for training and funding in Illinois' plan, and that students with speech-language impairments are afforded the same opportunities and accommodations as other students with disabilities under the plan. We agree that a multi-disciplinary, team approach is vital for supporting students with diverse learning needs, including students with disabilities and English Language Learners. We maintain that SLPs and audiologists are integral parts of these educational problem solving teams and should be included in them to the extent that is consistent with our scope of practice.

As you continue to develop the plan, please feel free to contact us should you have questions regarding the roles of SLPs and audiologists under ESSA or the provision of services to students with speech-language impairments.

Sincerely,

Kim Pepler, President
Illinois Speech-Language-Hearing Association

Dear Dr. Smith,

Thank you for the opportunity to submit comments on the Illinois ESSA State Plan. I am a parent of 4 children, a member of Faith Coalition for the Common Good, in Springfield, Illinois. Where I Am Co-chair of the Education Task Force, and a member of Stand for Children IL. Myself as well as others have a huge concern for Springfield as well as this State. We have been researching for countless hours on ways to improve our school districts, due to the extent of our research we have come down to an adequate amount that can be applied to the State of Illinois. **Some questions that I hope to be answered are in Red.** I hope you will understand the following suggestions to strengthen your next draft:

We have to get down to the root of the issues in order to recommend solutions to problems that we are just covering up. Students can only succeed once these issues have been addressed with Morality and Clarity to give them a Brighter Future. Some vestiges must be eliminated, or show a progression to where schools are meeting standards set by the Supreme Court, for a period of 20 Years. The following areas will include:

- Student Assignments: students assigned to the proper schools, unless noted by a transfer or administrative assignment. **What are the rules of Court for the attendance zones? What permits modification for schools to close, to be opened, and to be overcapacity?**
- Faculty & Staff Assignment: With the consideration with the English -Language Proficiency, the school needs to reflect the demographic of the schools population at 18%. There must be Recruitment of Minorities that have a Qualifying Standard to be able to Teach from the native tongue to the English language, and all said staff should be in place, or knowledgeable of the language in all areas of the school. this would require Faculty and Staff to be Bilingual to which

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it's capacity serves. I would like to see a rise of African American teachers without our school districts, I have discovered a Mass of Discriminatory Personnel actions based on race. I would like to see the State and Local provide Mandatory Professional Development to advance Every Student to Succeed, As well as look at all curriculum that are in place, especially in the areas of behavior, **Are the programs in schools, do they have a diversified team/members?** Remember, we cannot solve the Solution till we reach the Root of the Problem.

- Facilities: **Are buildings in adequate condition to supply students what they need, are building codes up to regulation?, regardless of race and boundaries. How does the district prevent overcrowding?**
- Transportation: We have a huge concern in Springfield, as throughout the State of Illinois, that lower income students have to wake 2 hours early to be able to catch the bus in the mornings, as opposed to higher income students, they can catch the bus in 10 minutes, enjoying their sleep, which leads to a higher performance level and brain development. **Are transportation systems reviewed annually?**
- Extracurricular & other Resourceful Activities: **What are the school services, athletics, activities and other programs in place that are based on non-discriminatory basis?** I believe that ALL school related services should be open to all without regard to race, this has a great impact on the school, not the student. As well as providing Creativity, this will eliminate behavioral issues in the school and community, if the ESSA was implemented step by step, and not taking anything out for the benefit of the State, District, and Schools.
- Funding: **How are funds being spent by the School Districts, and the Schools/ How is data being provided to the State of Illinois for proper allocation of funds? What monitoring will be in place to ensure funds are being spent based on the needs of the students?**

There is a Plan of Action that is in place within my community to overcome some of the issues that I have presented above, it has required extensive research, but yet it is in full detail of what is required by the School Districts to report, on a as needed basis, which brings to mind that a System of Collecting, Implementing, and Delivering Data needs to be established in full detail.

Thank you, and I look forward to seeing the next version of the plan, as well as questions to the answers that I have provided

Sincerely,

Celeste Dean
Faith Coalition for the Common Good
Education Task Force Co-Chair

2208 E. Kansas
Springfield Illinois 62703
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I appreciate ISBE's efforts in soliciting feedback from schools and community members on the drafts of

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ESSA. In regards to college and career readiness I really like the 4 pathways that was presented in draft 2. My understanding is students could show college and career readiness by meeting one of the four pathways. I think this model is the best way to show readiness while taking into consideration the differences of high schools throughout IL (some offer dual credit, AP, tech classes while others do not). I would suggest that career indicators be added to Pathway A as it seems to be in each of the other pathways.

In regards to the weighting of the indicators it's hard to answer this without knowing how the school success indicators will be calculated. With that being said based on what I know now I would lean towards the 70/30. I really like that academic growth is considered but would like more information when it says academic growth or graduation rate, which is it and how will it be decided. Also, it appears that graduation rate is being considered as one of the success indicators (slide 7 in the Draft 2 powerpoint presentation). Would graduation rate be counted twice? Also, what if a district doesn't have a large enough EL population (less than 5 EL students district wide) what would happen to that percentage in the calculation?

In regards to the models of the student growth I like the hybrid model. While I understand this may be more difficult to present to the public I think it best represents how we look at data in schools and best represents our students' learning. I think the growth to proficiency should be a part of the hybrid as it is extremely important to look at data over time for a student. This allows us to really see if interventions, enrichments, etc have really had a long term impact on students' learning.

With Warrensburg-Latham Cardinal Pride,

Dr. Kristen Kendrick-Weikle, Superintendent

An end user has submitted new information on the Website Feedback form. Here is the information:

First Name: Jim

Last Name: Allen

Email: jsallen@siu.edu

Comments: As Vice President for Academic Affairs for the SIU System, I wish to provide comments in keeping with the Illinois Board of Higher Education's concerning, especially, the Career and College Readiness Framework.

- I very much appreciate ISBE's statewide listening tours.
- However, the CCR framework is really a design task that must be done in design-oriented (not feedback-oriented) meetings with higher education as a key design stakeholder.

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· Suggestions:

- o Plan for stakeholders to engage in a 2017 design process with secondary education and Illinois institutions of higher education.
- o Use national bodies' work (e.g., CCSSO's www.ccsso.org/Resources/Programs/College_and_Career_Readiness.html; SHEEO's work; Higher Ed for Higher Standards' work, <http://higheredforhigherstandards.org/leveragingessa/>).
- o Use multiple measures and draw on the foundation of the Illinois Learning Standards as a baseline for conversations about preparation and transition.
- o Capitalize on current Illinois projects:
 - o P-20 College and Career Readiness Committee
 - o PWR Act (HB5729) – The PACE framework
 - o Community colleges' and four-year institutions' regional partnership work (speed up, catch up).
 - o The Illinois Balanced Accountability Measures group.

In work on a framework so critical to the success of our students in higher education, closer collaboration with higher education than was evident in the ESSA implementation planning is not an option but a necessity.

Thank you.

Dear Dr. Smith:

Thank you for the opportunity to submit comments on the Illinois ESSA State Plan. I am a parent and a member of Stand for Children. I hope you will consider the following suggestions to strengthen your next draft:

- Weight subgroups heavily so that no student is left to fail.
- Weight growth heavily so that schools that are driving learning gains despite socioeconomic challenges are rewarded for that success.
- Prioritize diverse educator pipelines by funding the Diverse Educator Exchange.
- Summative scores should be parent-friendly so that they may understand the quality of their child's school.

Thank you again and I look forward to seeing the next version of the plan.

Sincerely,
Keshia Wilson

ISBE requests feedback on its plan to identify schools for comprehensive services and exit criteria.

Until the funding formula is fixed, no plan will correct the current structure and outcomes. That said, ensuring equitable outcomes for student subgroups requires initiatives directly targeting

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institutionalized racism and poverty. Comprehensive services could include training on anti-racist leadership and teaching.

In addition to comments made via engagefor schools.org, we wanted to include a few more:

1. GED should be allowed to be included in the graduation rate. We have students who must work in order to help provide for their families and choose this path.
2. Weighting of indicators: No indicators include #11-#40 that we can see. Why are they not considered?
3. On page 28 of the PPT presentation of ESSA State Plan Draft #2 Accountability, what does at or above reading level refer to?
4. Why are you using 2.8 GPA? Many schools are switching to Standards-Based, non-GPA grading. A .2 difference between distinguished scholar and just meeting seems insignificant. How was that established?

Thank you for taking comments from the Harlem School District Instructional Services Team.

Shelley Wagner
Director of Secondary Education
Harlem School District #122
(815) 654-4500 ext. 1034

Requires the state seal of biliteracy to count for 2 years of foreign language credit. It should also be an academic indicator.

Matt Raimondi

I am responding to Nathan Wilson's request to community college institutional researchers regarding comments/guidance on ESSA State Plan Draft and College and Career Readiness Framework based on any local findings.

I thought some of the work we did here at Triton College on placing students into college level courses would be relevant to this discussion. We recently decided to implement a placement process that utilizes multiple measures to determine a student's readiness to enroll in college level courses. Based on some extensive research that we did, we identified the following measures for our placement process - ACT/SAT score, AP examination scores, High School GPA, non-cognitive skills indicator (measured by Success Navigator® test), and score from a dedicated placement test (Accuplacer®).

We plan to implement the new placement process starting fall 2017.

I hope this information is useful to this discussion. Please let me know if you have any questions.

Thank you.

Kurian

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Kurian Tharakunnel, Ph.D.
Executive Director of Research and Institutional Effectiveness
Triton College
2000 Fifth Ave, Room F-209A
River Grove, IL 60171
708-456-0300 x3635

Hello,

My name is Katherine Hosanna and I am writing to comment on Section 4.2A of the current ESSA Draft. I represent myself as well as a team of teachers working with Educators 4 Excellenc to improve teacher feedback on evaluations , as well as how teachers can move forward to improve their own practice. Through research, we have gathered that only 30% of teachers improve under principal driven teacher evaluation systems. It has been shown that there has been a significant improvement in student growth when principals utilize leaders within their own school to coach and offer professional development We believe that ISBE should support this practice by defining teacher leadership in the ESSA draft and outlining that Title II funding can be used to pilot these innovative best practices.

Sincerely,

Good evening,

My name is Latasha Mallory and I am writing to comment on section 4.2A of the current ESSA Draft. I represent myself as well as a team of teachers working with Educators 4 Excellence to improve the coaching and feedback opportunities in Teacher Evaluation. We have found that 7 out of 10 teachers do not improve under principal driven teacher evaluation systems. Some of the most successful schools around the world that have utilized teacher leadership have shown significant reading and math gains, overall teacher satisfaction, and retention. Since ISBE is proposing utilizing Title II funds to "equip school leaders, both teachers and principals to act as instructional leaders" we believe ISBE should define teacher leadership in the ESSA draft. We further believe that ISBE should outline that Title II funding can be used to pilot programs that allow teacher leaders to use evidence based practice to collaborate with principals and other staff to improve student achievement.

Sincerely,

Latasha Mallory

Chicago Public School Teacher

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WIDA is raising the standards for proficiency of the ACCESS test. If previous years' data are used to set the benchmark, many IL schools will look like they are failing since they are changing the scoring procedures. It is a good metric but needs to be done carefully and in cooperation with WIDA. I would suggest using average SPGs and the percentage of students meeting expected targets.

Matt Raimondi
Assessment & Accountability Coordinator
School District U-46
355 E Chicago St
Elgin, IL 60120

Phone: 847-888-5000 (5382)

Fax: 847-888-7167

Webinar: <http://join.freeconferencecall.com/assessment>

Audio: 712-775-7031, 511-430#

I think that I may have missed the deadline with this so am sending it to you in the event we are still allowed to give input. I have had computer issues, so that has delayed its submission.

The following are areas of the ESSA Plan Draft #2 about which I have questions, feedback, or hope for further information in the future. My questions or comments tend to reference themes in the document, so are not always relevant to a specific section. My questions/feedback are again focused on areas about which I am the most compelled to speak and about which you have probably received less feedback (given that not as many stakeholders probably have perspectives in these specific areas).

- Throughout the document, terms/statements such as “all students” or “each and every child”, are used, yet this wording appears to be contradicted by the State’s articulated goals (e.g., 90% at or above grade level as per pg. 21 of the Reader’s Guide) and the fact that the document does not, to this point, define accountability, improvement, or supports for literally *all* students/demographic groups. There are still areas in which ESSA “coverage” has not been fully developed in the document, so I am waiting to see how these sections will look.

Feedback:

- It might be helpful to add a clarifying statement at the beginning of each appropriate section about how accountability or support will be applied for schools with demographic groups that do not meet the minimum “n” size.
- See feedback below in reference to specific students demographics such as those with low incidence disabilities and military dependents.
- The issue of appropriate “n” size and the constitution of a subgroup for accountability and support purposes is a concern, not just in Illinois, but also in other states/territories. On one hand, Illinois’ ESSA Plan, in its current form, appears to imply that certain student demographics who do not meet the minimum “n” size, and the programs/schools/staff who work with them,

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will be outside the scope of the State's accountability, improvement, and support framework. Conversely, in attempting to be fully inclusive, the current draft of the plan appears to be based on generalizations about broadly-defined demographics.

- Low incidence subgroups may not reach the “n” size of 20 required in some schools/districts, so how will accountability or supports for programs and staff that serve those students be addressed? Is there a supplemental plan for ensuring that programs that fall below this “n” size cutoff are held accountable for ensuring that *truly* all students are being exposed to a rigorous education that provides continuous opportunities for academic and functional growth? How will they be supported in this endeavor? Will other ISBE monitoring and support systems already in place fill the gaps where ESSA does not reach or will the ESSA plan grow to encompass this?

Feedback: As mentioned above, it might be helpful to provide a clarifying statement (s) about how accountability, improvement, and supports will be applied to schools serving student demographics outside the minimum “n” size. I see that this is addressed in detail for some student demographics, such as migrant students, but is not, at this point, addressed in the plan for other groups (e.g., students from military families, students with the extremely involved medical needs or degenerative/terminal conditions, etc.). A campaign to “advertise” additional State-approved resources for these might be helpful, also.

- The broadness of subgroup definitions, and generalization of approaches, may render the ESSA Plan inaccurate in regard to accountability and ineffective in regard to implementing improvement, support, or capacity building strategies:
 - Placing all students with disabilities under a single subgroup umbrella of “students with disabilities” for accountability and support purposes defies the basic premise on which all disability law is based: That all students are unique and have very individual strengths and needs. This concern has been articulated by educational leaders in other states, as well. A child with dyslexia has very different strengths and needs than a child with end-stage metachromatic leukodystrophy, and a child who has had substantive early intervention services may have very different strengths and needs than a student who has become permanently disabled secondary to an accident/illness later in childhood. Two individuals with Autism may also manifest very differently. Even students within the one percent who are administered alternate assessments represent such a substantial range of levels and types of strengths/needs that generalizations for accountability, improvement planning, and support cannot be made about this group (or the schools/programs/staff that serve them), either.
 - Having worked for the DoDEA (formerly DoDDS), as well as having worked extensively with military dependents enrolled in civilian schools around military installations, I know that the issue of tracking these students and their progress through various family deployments is difficult. Students often go off the radar for extended periods, their records don't always follow them, their education is interrupted frequently, they may enroll or withdraw in the middle of the standardized assessment window, the pace or sequence of the curriculum they

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received in another state may not match what is being tested in their new school, they may have had part of their education in international or host nation schools, etc. All these, and a number of other factors, may mean that accurate measurement of dependent students' progress is compromised, especially if only standardized metrics are used. Each student's circumstances are different (e.g., Some may have been fortunate enough to stay with relatives or enjoy a secure family deployment for extended periods, while others have moved every few months.) How will these issues be addressed when considering accountability relative to this subgroup? Who will support the schools who are facing these issues?

Feedback:

- It seems that in order to actually get an accurate measure of students' growth, address the needs of all students, and support the programs/schools/staff that serve them, it is critical that we disaggregate student data further, and avoid making determinations based on broad, "umbrella" data. For FERPA reasons, perhaps this disaggregated data cannot be publicly reported, but I am hoping that the new data system will allow this level of customization for both our use and for districts/schools.
- In attempting to address accountability and supports relative to educating students from military families, it is critical to have not only an intra-departmental and intra-agency wrap-around approach, but also to engage with the DoDEA, other states'/territories' departments of education, international schools, and possibly even other countries' ministries of education. As supports for students and families in military communities (milcoms) is intertwined with the milcom or local school systems, it is essential that those are also included in this coalition.
- Who will vet the providers of supports via IL-EMPOWER? Will there be qualified, appropriate support for schools order to ensure that specific low-incidence student demographic groups receive a quality education and continuous opportunities for academic and functional growth? Because some segments of the student population and the programs who serve them have traditionally not received the level of accountability and support as others, there has been a perpetuation of not so best practices in some sectors. Services for persons with disabilities, for example, have been the target of a lot of questionable science, predation by people looking to make a profit, and well-meaning persons who simply don't have the appropriate expertise to be supporting programs/schools/districts. This is in part because there is relatively limited viable research or supports available relative to educating students with the most intensive needs (e.g., students with extremely intensive medical needs, students who are very self-aggressive or aggressive toward others, etc.).
- Perhaps I missed it, but I am curious about how the needs of students who cross demographic groups (e.g., students who have disabilities, are homeless, *and* English Language Learners), and the programs/schools/staff who serve them, will be addressed. How will the programs/schools/staff who support them be held accountable (e.g., Students may be counted in several different demographics' data, but should there also be consideration of the

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interaction between these factors and that impact on the data?) and supported? Will there be intradepartmental and intra- agency teaming?

- Student Academic Growth Models – A hybrid model appears to offer the most flexibility; however, it is my belief, given the unique circumstances many students, and the programs/schools/staff that serve them face, ranking or comparison-based models should be avoided.

Thank you for considering my questions and comments.

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3. Pathway D – This one will be more limiting for a student to get into a college/university. It will depend on the admission requirements.

4. Career Indicators

Workplace Learning Experience – This should be Work Based Learning Experience. There will need to be definitions.

Industry Credential – Not all programs offer a credential. This will also need to be defined on what would be considered a credential.

Military Service - At the secondary level it might be wise to indicate Military Service – Exploratory (including JROTC). ROTC is only at the postsecondary level. JROTC would be at the secondary level. The amount of Military Service at best would be boot camp and then some weekends. It seems to be a bit misleading.

Accessibility to these types of Career Indicators also needs to be taken into consideration.

5. Academic Indicators

Accessibility - What can districts that do not offer do to meet these? Can honors courses count? Can research projects of the particular industry count? What about publications?

Can any AP and Dual Credit count?

6. How can employer be involved to know if we have indicators that are working?

I appreciate the opportunity to give some input. Have a great day.

Dora Welker
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State Board of Education,

Thank you for soliciting feedback of the Every Student Succeeds Act (ESSA) proposal that the State of Illinois will submit to the Department of Education. Serving the varying needs of our diverse state is not easy.

Please accept this feedback on behalf of the administration who serves the 6000 students in Batavia Public Schools D101.

Concern 1

While both the State's goals and proposed accountability system are improvements from the NCLB mandates, it is a concern that the goals of the State and the accountability system are not aligned. This may result in duplicated work, inefficient improvement efforts, and a lack of focus. Please consider aligning the goals and accountability systems that are reflected in the proposal.

Concern 2

Using growth data is an important element of the plan and one that best serves the needs of students, no matter their academic proficiency. From the draft plan, it seems that growth will be based on the same metric that is used to gauge proficiency, PARCC. For growth, we suggest allowing for districts to submit their own growth data from correlated assessments such as NWEA's MAP assessment. This would allow for more frequent measure to take place to guide improvement efforts. Allowing assessment flexibility to show growth would adapt to the varying needs of districts and allow for continuous improvement efforts without burdening the State with further assessment costs.

Concern 3

The use of English Learners in the accountability system is important to address the needs of this sub-population but the metric is distorted for districts like Batavia that have small programs. Using EL student performance as a part of a larger metric of underperforming students might be more advantageous to the State's plan. Our district has focused our efforts on those students who score below the 30th percentile rather than using demographic labels. Sub groups determined by an arbitrary number (20) seem to be more aligned to NCLB than the spirit of ESSA.

Concern 4

If high school graduation rate is included in these metrics then different rules need to be developed to account for students that need 18-22 year-old programming. Currently, these students count against our District on this measure.

Advocacy 1

Our District administration believes that the 51/49% accountability formula is the most whole-child way to measure a District's and school's performance.

Advocacy 2

Our District administration believes the pathways model will best serve students and spur positive growth for our high school students.

We encourage you to resist the feedback that protects certain programs and certain staff and allow Districts to best determine where to allocate resources to meet the goals.

Thank you for taking for soliciting our feedback.

Sincerely,

Dr. Lisa Hichens, Superintendent
Dr. Brad Newkirk, Chief Academic Officer
Dr. JoAnne Smith, High School Principal
Dr. Kelley Karnick, Curriculum Director

--

Brad Newkirk
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Good Morning,

My name is Amy Romito and I currently work with Chicago Public Schools as an Instructional Coach for Career and Technical Education teachers.

I am concerned with the proposed Teacher Residency programs mentioned in Section 4.2, page 51-52, under Support for Educators.

I have had the pleasure of supporting CTE teachers for the last 3 years and see over and over again CTE teachers (with an alternative licensure for teaching) struggling with the teaching basics that are taught in a 4 or 2 year preparation program. What is currently being proposed to address the lack of readiness for our teachers, who are have earned an alternative certification?

I recently attended the ACTE VISIONS 2016 conference and one specific session peaked my interest about pre-service preparation programs for CTE teachers and that Title II funds could be used to supplement these programs. My concerns is who and what is determining the structure of these learning and fast track programs for our teachers? Especially those who will be teaching in a large urban setting, similar to Chicago.

In my experience, students develop a connection with their CTE teacher due to having them for multiple years. Since such a connection can be achieved shouldn't we put more time and effort into preparing our CTE teachers?

I look forward to your response.

Best,

--

Amy Romito
Instructional Support Specialist
Office of College and Career Success | Career and Technical Education (CTE)
Chicago Public Schools
Garfield Park Office
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Chicago, IL 60612
Phone: 773-553-6681

Alahrie just submitted the survey 'Questions to Consider' with the responses below.

ISBE requests feedback on its plan to identify schools for comprehensive services and exit criteria.

No Answer

ISBE requests feedback on its plan to identify schools for targeted services and exit criteria.

No Answer

Please submit general comments below:

It seems that there should be some type of threshold or benchmark that differentiates between systemic issues v. school level issues, so that resources are not squandered. For instance, it is not a school issue if a district funnels low performing, high chronic absences to a specific school. Regardless of principal, staff, etc., the district has created a low performing school and is now asking for additional funds. We should look at Canadian and British models of systemic reform and have accountability at both the school and district level.

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Huntley High School (CSD 158), for the past 9 years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I've been a member of the PBIS team at my school for the last 7 years. Since then our numbers of office referrals and common misbehaviors (such as tardies and unverified absences) has greatly decreased, even though our enrollment continues to increase. With this, students gain academic time and participate in positive experiences at school.

In addition, I attribute the positive climate in our school to the promotion of our PBIS big 3: "The Raider Way: Be Respectful, Be Responsible and Be Involved." There is not a student or faculty member in our school who cannot name these three values we hold dear.

All of this is a direct result of the support the PBIS Illinois team (now Midwest PBIS Network) invested in our early efforts. They helped us to establish Tier I supports through lessons, acknowledgements, data

keeping with (SWIS) and educating through advertisement of our big 3. Beyond that we were able to establish Tier II supports (check-in, check-out, mentoring, and groups) through the wise of guidance of PBIS staff. Currently, we are part of a Tier 3 RENEW study for students most at risk.

Each year, we go through a thorough audit through the Midwest PBIS Network to make sure that we are still headed true North. This helps us to highlight areas of both success and weakness in order to better serve our students.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - o Trauma-Informed Environments
 - o Positive Behavior Interventions and Supports (PBIS)
 - o Classroom Management
 - o Anti-Bullying Programming
 - o Restorative Practices
 - o Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - o Check-In, Check-Out (CICO)
 - o Family Engagement
 - o Education Environment Practices
 - o Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - o School-Community Partnerships

Sincerely,

Laura Jenkins

Instructional Coach
PBIS Tier 1 Coach
Math Team Coach
Huntley High School

Why aren't school growth percentiles considered? While student level growth percentiles have a high variance, schools, or aggregated SGPs have much lower variance. aggregate SGPs are highly correlated with other value added models.

Seal of biliteracy is still not listed as an academic or career indicator. It should be at least one if the state values biliteracy.

Matt Raimondi

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Below

are the District comments on the ESSA draft 2:

- Concerned about statutory components to the following: identify and address disparities in library resources and to support efforts to encourage and support the arts. Seems both are acquiescing to special interest groups.
- Strong concerns about everything that ISBE is trying to put under the Title umbrella: EL accountability (should stay with EL grant), need clear guidelines for Title IV allowable expenses, and the definition for Title II needs to be broader to include mentoring and induction.
- Concerns and lack of understanding for IL-Empower. District experiences with SIG and CSI all indicate a lack of experience within their supports team to accomplish transformation. The individuals reporting to the State have such experiences and skills, it is the staff members assigned to the Districts that have not exhibited the necessary skills and experiences to assist the District in the necessary changes for break through success. How will the State Board ensure that all supports to Districts have sufficient experience and skills to accomplish the significant changes needed?
- The data requirements asked of districts by the State Board is already voluminous and burdensome. In the presentations it is stated, "In order to be sensitive to the data reporting requirements for which schools and districts are responsible, ISBE is reviewing required reporting elements for schools and districts to ensure that additional data requirements would not be overly burdensome." As a part of this data review, please consider reducing the amount of required reporting.
- Concerned about the review of EL cut scores. Assume that the review would raise cut scores again. Consider keeping existing cut score that has been in effect for just a couple of years.
- PARCC needs to be translated into multiple languages. In our District, there are 36 languages.
- Graduation - College and Career Ready - if there are state requirements for graduation (for certain courses), why a GPA proposal (page 21)? We share the same concerns regarding the inconsistency of grades. Will students take the most rigorous courses to prepare themselves for the future or will they take less challenging courses?
- Page 22 - What is college placement exam? Is it Compass?
- The student growth models presented all provide advantages and disadvantages, but all have significant standards of error or are difficult to explain. Why would a district want to be judged

on performance on any of these systems? Once selected, will ISBE consider reporting the impact of the standard measure of error so that the readers would see that the score reported is really valid within the band of error (page 32)?

- Page 34 - EL weighting seems very high. Particularly with a pending review of cut scores for proficiency. The 60/40 model makes the most sense.
- Agree with using language that is negative (page 39).
- Exit criteria must include transitional funding for sustainability. Cannot provide large amount of support for several years that take it all away at one time (page 42).
- As mentioned above, statewide system of support is only effective if the entities have skilled and experienced staff interacting with the districts. ISBE needs to have some means to assure that this occurs (page 50).
- Title II should include mentoring and induction (page 54).
- (Page 56) proposed definition of effective teacher needs to clarify "subsequent". Do the ratings have to be consecutive or can an educator receive a needs improvement in an evaluation, receive proficient for the next two cycles and on the fourth cycle receive another needs improvement to be ineffective?

Mike

Mike Oberhaus

Superintendent

Rock Island - Milan School District #41

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Email: mike.oberhaus@rimsd41.org | Site: <http://rockislandschools.org>

December 15, 2016

Dear Jason:

First of all, we'd like to thank ISBE for the opportunity to provide comments on the draft ESSA implementation plan and for the inclusion of afterschool programming in its plan. We see many ways that the role of afterschool programs could be expanded in this plan to help Illinois' youth and schools.

To give you some background, Science Olympiad is a Chicago-area-based national nonprofit organization founded in 1984 and dedicated to improving the quality of K-12 STEM education, increasing student interest in science, creating a technologically literate workforce and providing recognition for outstanding achievement by both students and teachers. More than 225,000 students on 7,600 teams

from all 50 states competed in 400 regional, state and national Science Olympiad tournaments last year. In Illinois alone, we have nearly 400 teams, 30+ from Chicago Public Schools, the site of our inaugural Science Olympiad Urban Schools Initiative program.

As you know, Science Olympiad has served on the Illinois P-20 Council College and Career Readiness Committee chaired by John Rico since 2010, and helped develop the Postsecondary and Workforce Readiness Act (HB 5729). Additionally, Science Olympiad participated in focus groups around the New Skills for Youth Initiative, bringing expertise from the perspective of a national program that allows students in Grades 6-12 develop skills in science, technology, engineering and math (STEM) industry sectors of their choosing. With its diverse events touching every letter in STEM, Science Olympiad is one of the largest STEM workforce development youth programs in the nation.

Here are a few thoughts on the ESSA implementation plan:

Plan Feedback

☐ Outreach and Input [Section 1.1 (A)(i)]: We encourage ISBE to accept feedback from the diverse afterschool community because they are important partners for school day learning. Many states have created entire committees filled with stakeholders that are collaborating on writing the plan, including members of the afterschool community. We encourage the state to work as closely as possible with afterschool providers in constructing its plan.

☐ Improving Academic Outcomes: Afterschool programming has been proven through research to improve youth outcomes and should be used as a strategy for improving schools and academic achievement.

o *Accountability System Indicators* [Section 3.1]: Afterschool programs address many of the school improvement indicators listed as non-academic indicators. We recommend it be added as a separate indicator as well.

o *Well- Rounded and Supportive Education for Students* [Section 5.1(B)]: Afterschool programs should also be used as a strategy to create a well-rounded and supportive education for students because of its proven ability to improve educational outcomes and expand the subjects to which youth are exposed.

☐ Data: ISBE can use ESSA implementation as an opportunity to collect data on a range of youth outcomes.

o *Ed360* [Section 3.1; Section 4.2(B)]: Incorporating data such as this into the educator's dashboard/Ed360 and sharing that information with community partners that run afterschool programs could help to track outcomes and improve instruction.

☐ Family Engagement: Afterschool programs provide a crucial bridge between communities and schools and can help foster the family engagement called for under ESSA.

o *Family Engagement Funding*: ESSA's provisions on Parent and Family Engagement in Title I Part B call on education agencies to collaborate with community-based organizations, such as afterschool programs, to carry out parent engagement plans and in using its parent engagement funds. We encourage ISBE partner with afterschool programs in using these funds.

☐ Funding: Because afterschool is such an integral part of educational improvement, we encourage ISBE to use the opportunities present in ESSA to make investments in afterschool to support this crucial service.

o *Allocation of School Improvement Resources* [Section 3.3 (A)]: In allocating funds set aside for school improvement, we remind ISBE of the positive effects of afterschool programs and encourage ISBE to allow funds to be allocated to afterschool when planning for school improvement.

o *Title IV Part A Funding* [Section 5.1(G)(iv)]: ISBE should consider opportunities for STEM learning and college and career readiness in afterschool when using the Title IV Part funds.

☐ STEM: ESSA places an emphasis on STEM learning, an area in which afterschool programs provide limitless opportunities for students to advance. To allow for the level of exposure and experiences needed to develop a deep understanding of STEM subjects, we must ensure that all communities offer multiple and varied ways for students to engage with these subjects, including afterschool programming.^[1]

☐ College and Career Readiness: Afterschool programs offer a key opportunity to expose students to higher education options and career paths and to teach skills that can unlock doors to future career prospects.^[2] The afterschool hours offer time for apprenticeships, guest speakers, and project-based activities that are not always available during a school day focused on a core curriculum. Afterschool programming in this area could also help to support ISBE's College and Career Ready Indicator as outlined in its ESSA Implementation plan.

☐ Evidence-Based Practices and Training:

o *Training* [Section 4.2(A); Section 5.1(C)]:

☐ We request that ISBE utilize federal funding provided through Title II Part A to support the integration of afterschool and informal learning pathways into STEM Teacher professional development programs. These funds can be used to expand the use of hands-on STEM learning, which can take place in a wide variety of afterschool and informal settings.

Conclusion

☐ The implementation of ESSA provides Illinois with the opportunity to create a comprehensive vision for student success.

☐ We hope ISBE continues to consider the many aspects of positive youth development and considers afterschool programs as strong partners in creating positive youth outcomes.

Sincerely,

Jennifer A. Kopach

Executive Director

[1] Talking Points, Afterschool STEM Hub, <http://www.afterschoolstemhub.org/> (last visited May 1, 2016).

[2] Afterschool: Supporting Career and College Pathways for Middle School Age Youth, Afterschool Alliance (Jan. 2011), http://afterschoolalliance.org//documents/issue_briefs/issue_collegeCareer_46.pdf.

--

Jenny Kopach

Science Olympiad

Executive Director

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ESSA Draft Comments December 12, 2016

The current College & Career Ready Framework information shows that “career indicator” options include attendance, community service, workplace learning, industry credentials, military service, and/or two or more co-curricular activities. One of the recommendations we previously gave to the

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HR477 Career Pathway Workgroup is that an important option for demonstrating College & Career Ready status should be completion of a two credit sequence in any approved CTE career pathway.

National research shows that student success is often correlated to sequence completion. These career pathways often include some of the other mentioned indicators like dual credit or workplace learning, but the courses themselves are conspicuous by their absence as a career indicator option.

Thank you for including these comments.

Dr. Cothran

--

Dr. Anne Cothran, Director

DVR

Des Plaines Valley Region Education for Employment System 030

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I'm providing a comment regarding the College & Career Ready Framework. I like the multiple pathways that define readiness. Because this is a framework for College AND Career Ready, I suggest that a minimum of 1 Career Indicator be required for Pathway A. From my experience, those students achieving pathway A will also have a high attendance rate and probably participate in some kind of community service or extra-curricular activity.

Thank you for listening to feedback from the field.

Katrina Plese

Executive Director

Wilco Area Career Center

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Cell: 815.693.0605

Good morning,

Thank you for offering the listening tours. I appreciated the opportunity to hear more about ESSA and the Illinois plan. Below are a few points I considered as I listened to the details:

--Climate surveys--We have difficulty getting parents to respond, even when we beg them to do so.

--GPA measure for accountability--How would you plan to standardize that, so that it isn't watered down by some districts in an attempt to meet accountability targets?

--Will PERA student growth parameters for teacher evaluation change in Illinois?

--I think we all appreciate the potential flexibility in Title I.

Thank you again,

Carrie

--

Carrie E. Hruby
Superintendent
District 90
O'Fallon, IL

To Whom it May Concern:

My name is Donn Mendoza and I serve as the Deputy Superintendent of 6-12 Teaching and Learning /Principal of Round Lake High School in Lake County Illinois.

Overall, the College and Career Readiness Framework being proposed is a significant improvement over existing accountability systems in my opinion. I did however, want to communicate one significant concern that will affect may school districts in the state of Illinois.

Specifically, as it relates to Pathway C, some high schools in Illinois, many of whom have diverse student populations and higher poverty rates have adopted an Integrated Mathematics pathway. So, instead of offering Algebra, Geometry and Algebra II, an integrated path includes Math 1, Math 2 and Math 3. Math concepts of the traditional math sequence (Algebra, then Geometry then Algebra II) are integrated into all three integrated courses.

As it relates to Pathway C in the proposed framework, one of the major indicators is earning an A, B or C in Algebra II, which we do not offer nor does any other high school who has chosen to implement an integrated math path. As a result, Pathway C would NOT be an option for any of our students.

Recommendation- I respectfully request that the Pathway C include earning an A, B or C in either Algebra II OR Math 3 as they are in the same location with respect to course sequence.

Donn P. Mendoza, Ed.D.
Deputy Superintendent of Teaching and Learning (6-12)/RLHS Principal
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*"a catalyst for strong families
and powerful communities
where children matter most."*

December 27, 2016

Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Thank you for the opportunity to comment on the Illinois State Board of Education's (ISBE) state plan for the Every Student Succeeds Act (ESSA). Illinois Action for Children (IAFC) is a state wide organization and our mission is to be a catalyst for organizing, developing and supporting strong families and powerful communities where children matter most. Our programmatic focus is on Chicago and Cook County, while our policy and advocacy work is statewide. We administer the Child Care Assistance Program (CCAP) and ExceleRate, the state's Quality Rating and Improvement System, and administer the federally funded Child and Adult Care Food Program (CACFP) for home-based child care providers in Cook County. Additionally, we serve as the Head Start grantee and administer ISBE's Early Childhood Block Grant (Pre-school For All and Prevention Initiative) in the south suburbs of Cook County. Overall, as an organization our efforts respond to local needs with programs that focus on children's earliest and most formative years.

We appreciate the inclusive process of stakeholder engagement and the thoughtfulness that went into the drafting of the state's plan. Our comment will focus on a few areas where we believe minor changes can improve the overall educational experience for children and families across Illinois to truly embrace the intent of the law.

Accountability System (Section 3.1, page 20)

In the Every Student Succeeds Act, non-academic indicators were included under the accountability section in an attempt to measure factors that are often overlooked, yet have the ability to impede students' academic progress. Tracking non-academic measures provides schools and districts an opportunity to address and curb the effects of issues that may arise during the earliest years of a child's education.

Illinois Action for Children is very pleased to see ISBE is strongly considering the inclusion of chronic absenteeism as a measure of student success. We would like to emphasize our support for including this as a non-academic indicator within the state's accountability system. Addressing chronic absenteeism beginning in the earliest years of a child's life is necessary to ameliorate any possible obstacles that may hinder their opportunity to learn. By losing time in the classroom, students are missing out on valuable educational opportunities and cannot continue to build on their skillset. In tracking students' rates of absenteeism, schools can identify effective interventions to get students back into the classroom.

www.actforchildren.org

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Identification of Schools (Section 3.2, page 40)

Under ESSA, Local Education Agencies (LEAs) are asked to identify schools that are not meeting the academic standards established under the state's accountability system. They are labeled as Comprehensive Support and Improvement Schools or Targeted Support and Improvement Schools depending on the severity in which students' are underperforming.

LEAs with schools identified for additional support, must submit an improvement plan to the State Board of Education. To complete the plan, ISBE should require the LEA to conduct a district-wide needs assessment that specifically analyzes the early care and education landscape in the area, including the accessibility and quality of existing programs and the availability of resources to further enhance ECE services locally. The LEA should specify how it will facilitate the close collaboration among all early learning service providers (e.g. Head Start, preschool, and child care programs) to vastly improve local ECE efforts and ensure all children are Kindergarten ready.

Data and research have long supported young children's accessibility to early education programs because of the positive long-term academic and socio-economic outcomes. Some outcomes are the increased likelihood of: graduating high school, moving onto a post-secondary program, and obtaining a stable job. ISBE could work to better align the early education and K-12 fields to ease the transition process for young students. A few examples of alignment activities include:

- Having pre-K students visit and shadow a Kindergarten classroom
- Facilitating the sharing of student data among pre-K and Kindergarten teachers
- Providing orientation activities for students the summer before they enter Kindergarten

Better alignment between the early education and K-12 school systems has the potential to serve as a prevention strategy for children. Transitional activities between grades assist and better prepare children for their next step so they do not fall behind academically. This strategy can be incorporated into the state's new system of support for students.

In an effort to provide more comprehensive support, the State Board is currently working on the development of a new multi-tiered support system for schools across the state. ISBE has described IL-EMPOWER as "prevention-focused and data informed, thus providing a coherent continuum of supports responsive to meet the needs of all learners." Ideally, IL-EMPOWER will have the potential to address a wide variety of students' needs ranging from academic to behavioral issues. We believe that a focus on providing transitional assistance to students in early care and education programs, can serve as a powerful prevention and support strategy to allow all students the opportunity for a high quality education.

Supporting Excellent Educators (Section 4, page 50)

Regarding the use of Title II and Title III funds to better support teachers, ISBE should strongly consider using a portion of the funds to address the shortage of Bilingual/English as a Second Language (ESL) certified educators across the state. One possible strategy is to establish a set-aside of funds strictly dedicated to subsidizing the endorsement and hopefully incentivize more educators to pursue this endorsement.

Furthermore, ISBE could examine possible avenues to include Bilingual/ESL certification within the four-year preparation programs, as it is currently a completely separate endorsement process. Some four-year institutions have successfully incorporated this into their curriculum for licensure, but it is important to increase the number of programs that offer this option. Currently, the state is not meeting the need for educators that hold these certifications, meaning ISBE must offer solutions to address the shortage to provide students with the best possible educational opportunities.

Supporting All Students (Section 5.1, Part A, pages 60-62)

During the 2015 legislative session, the Illinois General Assembly passed Senate Bill 100 to constrain the use of out-of-classroom disciplinary practices in the K-12 system. This law seeks to address the disparate rates of suspensions and expulsions, as boys, students of color, English Learners and students with disabilities are disciplined at higher rates compared to their peers. We urge ISBE to require publically funded early care and education programs to report all instances of suspensions and expulsions on school report cards because they occur at rate three times higher within ECE programs compared to the K-12 field.

By identifying ECE programs with high suspension and expulsion rates, ISBE can further support these programs through their IL-EMPOWER framework to ensure all students are receiving the behavioral and educational services that best promote learning. Suspensions and expulsions should only be used as a final recourse when other options have been exhausted, to ensure our youngest learners are provided the opportunity to grow within their classrooms.

Throughout the draft of the state plan, ISBE has affirmed its commitment to improving school conditions through the reduction of suspensions and expulsions. Through the Student Support and Academic Enrichment Grant offered under Title IV, Part A, an additional opportunity to address this issue arises. Under this grant, funds can be used to implement a series of behavioral support programs for students within the district, which can be trauma-informed approaches. Young children within early education programs that are suspended or expelled typically have issues stemming from trauma, so the appropriate behavioral supports can certainly help mitigate the issue.

Supporting All Students (Section 5.2, Part E, page 88)

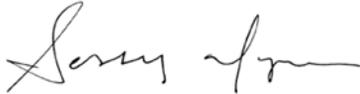
Studies suggest that children under the age of six compose the largest share of homeless children nationally and this holds true in Illinois as well. According to the Administration for Children and

Families, the latest data available from 2013 suggests there were approximately 50,088 children under the age of 6 experiencing homelessness across the state.¹ This represents 1 in every 19 children within that age range.² To further worsen matters, only ten percent of these children were served under Early Head Start, Head Start, and McKinney-Vento.³ Hence, it is vital that ISBE creates a tangible plan to ensure that we are reaching a larger number of children and families experiencing homelessness in Illinois.

As written into the state plan, School District Homeless Liaisons have a series of required activities to fulfill. The list includes to “distribute awareness and other educational materials to shelter providers and to other providers for homeless families.”⁴ We ask the State Board to provide more specificity and include local social service providers under the required list of providers to contact. Secondly, IAFC believes School District Homeless Liaisons should be required to conduct outreach to local community groups within their district. By working closely with well-established local community groups and launching strong relationships, the opportunity to reach more children and families arises.

Illinois Action for Children would like to once again thank the Illinois State Board of Education for the opportunity to comment on the Illinois State Plan for the Every Student Succeeds Act. We believe the department is committed to providing a high-quality education to all students across the state. The few changes we recommend in our comments would go a long way toward improving the educational experience for children and families. By including our suggestions listed above, ISBE will be closer to reaching the academic goals it has set for all students in the state. We look forward to our continued efforts to support working families across Illinois.

Sincerely,



Sessy Nyman
Vice President, Policy & Strategic Partnerships
Illinois Action for Children

¹ Administration for Children and Families. *Early Childhood Homelessness in the United States: 50-State Profile*. Washington D.C.: U.S. Department of Health & Human Services, 2016.

² Ibid.

³ Ibid.

⁴ Illinois State Board of Education. "Every Student Succeeds Act (ESSA) State Plan Draft #2." 2016.



December 27, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #2

Dear Dr. Smith,

Thank you for the continued opportunity to respond to the drafting of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

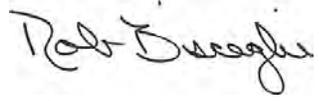
As we stated in our first round of comments, Action for Healthy Kids® (AFHK) is a nationwide grassroots network mobilizing school professionals, families and communities to take actions that improve school foods, nutrition education, physical activity, and physical education for all students. Through funding opportunities, expert technical assistance, and our flagship program, Game On, Action for Healthy Kids supports schools in developing healthy environments where children thrive. To learn more about the ways our 100,000+ volunteer network is helping to make every kid healthy, active and ready to learn, visit www.actionforhealthykids.org.

We have a robust chapter in Illinois, Illinois Action for Healthy Kids, which is a cross-sectoral coalition that includes a robust group of state and local partners that come together to work on community- and state-level nutrition and physical activity initiatives.

We appreciate the continued opportunity to work with our State Board of Education partners to assist in having schools places where staff, children and their families learn and adopt lifelong healthy habits.

In our comments to the Illinois State Board of Education (ISBE) on further improving the state plan, AFHK continues to provide recommendations, drawn from our years of experience, input from our broad network, and our mission to help all schools provide healthy foods, quality health and physical education, and comprehensive physical activity for all students. We are happy to provide additional information in this and other related matters upon request.

Sincerely,

A handwritten signature in black ink that reads "Rob Bisceglie". The signature is written in a cursive, slightly slanted style.

Rob Bisceglie, MA
CEO

Summary of Action for Healthy Kids (AFHK) Recommendations

As we mentioned in our first round of comments, Every Student Succeeds Act (ESSA) presents Illinois, and the rest of the nation, an opportunity to foster partnerships and a system that promotes the whole child through schools that address student health and wellness.

Action for Healthy Kids (AFHK) continues to strongly recommend taking this opportunity for Illinois to incorporate the strong interconnectedness between whole child health and wellness, academic achievement, and positive youth development by incorporating student health and school wellness into Illinois' state plan. While the 2nd Draft State ESSA Plan (2nd Draft) moves Illinois toward this goal, it still falls short in the areas creating a health and wellness learning and experience environment. AFHK strongly urges for Illinois State Board of Education (ISBE) to address the whole child in our state ESSA plan through some sensible changes and additions to 2nd Draft. This comprehensive, whole child approach will create a state plan that is supportive to school districts and schools, and most importantly, students, while better enabling the greater community to support schools.

Toward that end, AFHK would like to see these issues better addressed in the Illinois state ESSA plan:

- **Section 1.1 Coordination**: Include the opportunity to coordinate with the health system, particularly Medicaid for the expansion of school-based health services.
- **Section 2.2 Academic Assessments**: Develop and implement assessments for health, physical education and social and emotional learning that are aligned with the state's existing standards.
- **Section 3.1 Accountability System**: Include aggregate student fitness scores as the accountability measure for school quality.
- **Section 3.1 Statewide Goals to Complement Accountability Framework**: Include additional health-related indicators on the school report cards to illustrate various aspects of a healthy school environment.
- **Section 3.2 Identification of Schools**: Include student health and school wellness assessments to the list of assistance ISBE shall provide to LEAs.
- **Section 4: Excellent Educators**: Encourage practices promoting staff wellness to not only improve teacher satisfaction and retention, but also provide a whole school health and wellness learning environment.
- **5.1 G. Other state-identified strategies**: Require each LEA's plan to include how the LEA will support student access to a healthy school environment as defined by the "Whole School, Whole Community, Whole Child" model of the U.S. Centers for Disease Control and Prevention (CDC).

Second Draft of the State Plan (2nd Draft): General Comments

We are happy to read in the cover letter State Superintendent Smith talk about a "vision that places schools as the centerpiece of growing healthy communities where the needs of the whole child are met." In addition, ISBE states its intention for the final plan to address

the needs of the “whole child” (p. 6). Finally, the 2nd Draft identifies the long-term goal (p. 37) that “every school offers a safe and healthy learning environment for students.” AFHK, shares the Superintendent’s vision of the central positioning of the “whole child” concept in the Illinois state ESSA plan.

While this vision and goal are clearly outlined, the 2nd Draft fails to clearly and consistently provide a definition of the “whole child” or “safe and healthy learning environment”. If we want to meet this vision and achieve our goals, such clarity and consistency is need. That is why AFHK strongly recommends that ISBE establish a clear definition of what a safe and healthy learning environment by consistently use of the “whole child” framework. The lack of a clarity will impede efforts to determine what metrics or indicators can best be used to measure if schools are meeting this goal, the type of assessments that will best help schools understand their student’s needs, the evidence-based practices needed for improvement and the professional development that educators need.

AFHK supports the definition of a healthy school as one that understands and supports students’ well-being and student health as a foundation for learning. In this environment, students have access to good nutrition, physical activity, basic safety, clean air and water and access to care. In addition, students are building the knowledge and skills to make healthy choices that allow them to thrive. A healthy school environment includes promoting positive youth development, cultivating a supportive school climate and providing students with opportunities to connect to one another, adults and the school. Access to care includes physical, behavioral and mental health, as well as dental and vision, and prevention, screening and disease management. In a healthy school, students learn—through lessons and through example—to value their own health.

The Centers for Disease Control and Prevention (CDC) defines the whole child in the context of a [Whole School, Whole Community, Whole Child model](#). This model, which AFHK endorses and would like to see Illinois fully encourage into the state ESSA plan, emphasizes the need to coordinate policy, process and practice to improve learning and health. There are ten elements to this model: Health Education, Physical Education and Physical Activity, Nutrition Environment and Services, Health Services, Consulting, psychological and Social Services, Social and Emotional Climate, Physical Environment, Employee Wellness, Family Engagement and Community Engagement.

While the 2nd Draft does place a strong emphasis on the social and emotional climate, family engagement and community engagement, it falls short of the positive inclusion of many of the other elements of the whole child model—particularly Health Services, Physical Environment, and Employee Wellness. While many of these areas might be included in the needs assessments or in implementation of state supports, given the importance of these issues and schools’ general lack of prioritization these areas, AFHK strongly recommends that ISBE explicitly include these issues in the Illinois state ESSA plan.

To do such, AFHK endorses these specific recommendations for how to integrate a comprehensive approach to student health and school wellness into the Illinois state ESSA

plan, drawn, in part, from the recommendations of the Illinois Alliance to Prevent Obesity (IAPO).

Comments on Specific Sections of the 2nd Draft

Section 1.2 Coordination

On page six of the 2nd Draft, the plan says in the first full paragraph, second sentence “In addition to the challenging academic standards and high expectations for student achievement, there needs to be a refocusing on the social, emotional and behavioral needs of students.” AFHK recommends adding “physical” so that the end of the sentence reads “social, emotional, physical and behavioral needs of students.”

On page seven of the 2nd Draft, there is a discussion related to the coordination of funding. AFHK recommends that the IL state ESSA plan include the opportunity to coordinate with the health sector to leverage funding opportunities presented by recent changes in the health system including Medicaid to support the delivery of school health services.

Illinois has an important opportunity to expand Medicaid-funded school health services that provide students with access to school health services, including mental health services, for children across the state. This opportunity should be included in the IL state ESSA plan. Funding for school health services would complement Title I funds for school-wide interventions that support student health. A recent decision by the Centers for Medicare and Medicaid Services, along with the transition of Illinois’ Medicaid population to managed care, present two key opportunities for expanding Medicaid-funded school health services in Illinois. Currently, 45.5 percent of Illinois’ children, or 1.5 million children, are enrolled in Medicaid. These services could include physical, behavioral and mental, and sexual health services, as well as dental and vision, prevention, screening and disease management. It also could include acute and urgent care as well as case management.

In the summer of 2016, the U.S. Department of Education convened a learning collaborative to assist states in developing state strategies to expand the delivery of health services to Medicaid enrolled students. While Illinois did not participate, there is an opportunity to join. IAPO, which is coordinating the technical assistance for this national learning collaborative, is ready and willing to support Illinois in convening a team and developing a strategy.

Section 2: Challenging State Academic Standards and Academic Assessments

2.2 Academic Assessments

Given that Illinois already has standards for social and emotional learning and physical education (PE) and health, AFHK recommends implementing assessments for these areas.

Developing and implementing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on

the effect of instruction on student acquisition of knowledge and skills—based on state standards—will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas. AFHK does not recommend that these assessments be used in state accountability systems or in a punitive manner; rather, these assessments should be used to improve teaching and learning in these critical content areas.

Given that Illinois already has standards for health education and physical education, AFHK continues to recommend implementing assessments for these areas. AFHK further recommends that indicators and assessments should be designed to encourage schools to provide:

- Age-appropriate, culturally sensitive nutrition education;
- Physical education that is standards-based to develop the knowledge, skills, behaviors, attitudes, and confidence needed to be physically active for life;
- The provision of 60 minutes of daily physical activity (including physical activity incorporated into physical education);
- High percentage of eligible students participating in free or reduced priced school meals with breakfast and lunch;
- Access to healthy foods and beverages whenever food is served, sold, or shared on campus;
- Communicating and working with students, families, staff, and the community to promote the adoption of healthy eating and physical activity among students;
- Involvement of students, families, and community members on school health/wellness teams;
- Motivation of students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity;
- Access by students, through the school, to community resources to help provide healthy eating and physical activity opportunities.

A recommended way to achieve these measures would be the adoption of the School Health Index as the base assessment for Illinois schools as it represents a national best practice.

Finally, we also continue to recommend that ISBE, with the assistance of community partners, such as AFHK, provide technical assistance and guidance to school districts on comprehensive needs assessments that consider factors related to nutrition, physical education and physical activity, use evidence-based interventions designed to address identified needs, and recommend professional development for educators on optimally addressing the needs of students.

Section 3 Accountability, Support and Improvement For Schools (p. 17 to p. 50)

Section 3.1 Accountability System

AFHK endorses the recommendation of the inclusion of two indicators that are a measure of student success and/or school quality: rates of chronic absenteeism and student fitness as measured by FitnessGram. Both of these indicators have a strong correlation with

student achievement. The proposed indicators meet the U.S. Department of Education’s requirements for these measures, as shown below.

Table1: Proposed Accountability Measures Meet U.S. Department of Education’s Proposed Requirements

| | Chronic absenteeism | Physical fitness |
|--------------------------------------------------------------------------------------------------------|---------------------|------------------|
| <i>Is valid, reliable and comparable across all LEAs in the state</i> | ✓ | ✓ |
| <i>Can be disaggregated for each subgroup of students</i> | ✓ | ✓ |
| <i>Includes a different measure than the state uses for any other indicator</i> | ✓ | ✓ |
| <i>Is supported by research finding a connection to student learning</i> | ✓ | ✓ |
| <i>Aids in meaningful differentiation among schools by demonstrating varied results across schools</i> | ✓ | ✓ |

Chronic Absenteeism: Chronic absenteeism—which is commonly defined as missing 10 percent or more of school days for any reason, excused or unexcused—detracts from learning and is a proven early warning sign of academic risk and school dropout. Chronic absence results in decreased literacy and numeracy skills in elementary levels, higher rates of school failure in middle school, high school dropout and lower levels of college completion. In Illinois, about 13 percent of students are chronically absent, with 12 percent of school districts accounting for 75 percent of chronically absent students.

Given the critical link between chronic absenteeism and educational outcomes, AFHK endorses the recommendation that ISBE include rates of chronic absenteeism in its state system as an accountability measure. ISBE should adopt the definition of chronic absenteeism used by the nonprofit Attendance Works, which defines it as missing 10 percent or more of school days, including excused and unexcused absences as well as days missed due to suspensions. Schools are already required to report chronic absenteeism data to the U.S. Department of Education’s Office of Civil Rights (OCR) and include information on the school report card. When establishing this indicator, ISBE should consider Connecticut’s approach. In Connecticut, schools can receive up to 100 points total for this metric, with up to 50 points for their overall chronic absenteeism rate and up to 50 points for a high-need subgroup chronic absenteeism rate. Full points are awarded if chronic absenteeism is 5 percent or lower. No points are awarded if the rate is 30 percent or greater. Rates between 30 percent and 5 percent are awarded proportional points.

Student Fitness: According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being. Physical

activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during, and after school to ensure that their students are ready to learn.

Given the critical link between physical activity and academic achievement and in light of the recent requirement that school districts use FitnessGram assessments to measure student's progress towards personal fitness, AFHK continues to recommend that ISBE includes a metric of student fitness in the accountability system. The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use FitnessGram assessments to measure students' progress toward the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance and muscular strength. School districts are required to report aggregate data to ISBE by June 1 of each year.

AFHK recommends ISBE leverage the aggregate fitness assessment data as an accountability measure to assess school quality and student success over time. As data systems are developed, ISBE should also include the year-to-year differences in district reporting of the number of students that score within the Healthy Fitness Zone for the required fitness tests on the school report cards to track improvements over time.

Statewide Goals to Complement Accountability Framework (p. 39)

Metrics required to be included on school report cards can help LEAs and schools tell how they are meeting state goals and should be meaningful to school stakeholders and not counterproductively overburden schools.

ESSA already requires states that receive Title I funding to include other measures that relate to or inform student attendance: rates of in-school suspensions, out-of-school suspensions and expulsions; school-related arrests and referrals to law enforcement; and incidences of violence, including bullying and harassment. In addition, AFHK endorses the recommendations that the following measures be included to support the state goal of "every school offers a safe and healthy learning environment for all schools":

- **School breakfast participation:** When students eat breakfast, they have better attendance rates and improved academic achievement. However, according to the Food Research and Action Center, only about half the number of students who are eligible for free school breakfast actually eat breakfast.¹ School report cards should include the percentage of students eligible for free and reduced school meals, the percentage of students who eat lunch and the percentage of students who eat breakfast at school.
- **Integrated Pest Management and Green Cleaning Policy:** According to the Environmental Protection Agency, 10.5 million school days are missed each year due to asthma. Maintaining a healthy school environment by eliminating triggers for chronic

¹ Food Research & Action Center, "Mapping School Breakfast: Participation, Funding, and Growth." Available at: http://frac.org/frac_map/

illnesses such as asthma would positively impact attendance rates.² Report cards should indicate whether a school's policies and practices comply with state law related to Integrated Pest Management and green cleaning.

- Ratio of students to school nurses: Research published in the Journal of School Health shows that when students have access to a school nurse, their attendance improves because they are better able to manage chronic illness and can avoid trips to the emergency room.³ This information is already being submitted to the U.S. Department of Education's Office of Civil Rights (OCR).
- Ratio of students to school mental health professionals: Mental health conditions, behavior issues and trauma are all causes of school avoidance and truancy.⁴ This information is already being submitted to OCR.

Illinois currently includes measures related to PE on the school report card, which AFHK supports maintaining. IAPO recommends that ISBE include additional measures on school report cards which relate to student fitness. Additional measures could include but are not limited to:

- Age-appropriate, culturally sensitive nutrition education;
- Physical education that is standards-based to develop the knowledge, skills, behaviors, attitudes, and confidence needed to be physically active for life, including:
 - Average class size for physical education, by grade
 - Number of qualified PE teachers
 - Students granted physical education waivers, exemptions or substitutions
 - Percentage of students with disabilities that participate actively in physical education classes
- The provision of 60 minutes of daily physical activity (including physical activity incorporated into physical education), including:
 - Daily recess offered
 - Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- High percentage of eligible students participating in free or reduce priced school meals with breakfast and lunch
 - Including school breakfast participation and use, by the school, of an "alternative breakfast model" such as the successful breakfast after the bell model
- Access to healthy foods and beverages whenever food is served, sold, or shared on campus;

² United States Environmental Protection Agency, "Managing Asthma in the School Environment." Available at: <https://www.epa.gov/iaq-schools/managing-asthma-school-environment>

³ "School Nurses' Role in Asthma Management, School Absenteeism, and Cost Savings: A Demonstration Project." Available at: <http://onlinelibrary.wiley.com/doi/10.1111/josh.12102/abstract>

⁴ Upstream Public Health, "The Connection Between Missing School and Health: A Review of Chronic Absenteeism and Student Health in Oregon." Available at: <http://www.attendanceworks.org/wordpress/wp-content/uploads/2014/10/Chronic-Absence-and-Health-Review-10.8.14-FINAL-REVISED.pdf>

- Communicating and working with students, families, staff, and the community to promote the adoption of healthy eating and physical activity among students;
- Involvement of students, families, and community members on school health/wellness teams;
- Motivation of students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity, such as:
 - Policies encouraging students to bike or walk to school
- Access by students, through the school, to community resources to help provide healthy eating and physical activity opportunities;
- Strong local school wellness policies and implementation and revision practices, including:
 - Incorporation of compliance with federal Local School Wellness Plan rules and other measures and self-evaluations of overall school and student health and wellness in such ways that includes strategies for nutrition education, physical education, physical activity, and nutrition guidelines for all foods available on the school campus
 - Whether a school has a health/wellness team that meets regularly throughout the school year to support the development, implementation, monitoring, evaluation, and regular revision of the school health and wellness policies and plans
 - As of 2007, Illinois established a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy. AFHK recommends that ISBE integrate an indicator of the strength and comprehensiveness of the wellness policy, using a nationally recognized tool for measuring the strength of wellness policies, such as WellSAT, in the school report card.
 - In addition, AFHK recommends ISBE use existing tools to have schools self-evaluate the strength of their practices to implement the district's wellness policy, such as use of the Centers for Disease Control and Prevention (CDC)'s School Health Index or the Action for Healthy Kids School Health Index which provides schools with a readiness score to apply for the U.S. Department of Agriculture's HealthierUS School Challenge: Smarter Lunchrooms (HUSC:SL).

3.2 Identification of Schools and 3.3 State Support and Improvement for Low-Performing Schools

AFHK recommends ISBE encourage the existing self-evaluation tools, such as use of the Centers for Disease Control and Prevention (CDC)'s School Health Index, which AFHK has made more easily accessible through our Action for Healthy Kids School Health Index, and the U.S. Department of Agriculture's HealthierUS School Challenge: Smarter Lunchrooms Recognition Program (HUSC:SL). AFHK recommends then making this and other needs

assessment information standardized and easily accessible by potential community partners.

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools and Design Evidence-Based Interventions Based on Findings

Comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development, and health. For example, by assessing student fitness outcomes, schools can make adjustments to physical education programs to better meet student needs or determine whether or not they need to increase the opportunities for students to be physically active before, during, and after school. ISBE can work with partners to provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Fortunately, several publicly available tools also provide guidance on action planning to make improvements in the school environment. These tools include:

- The CDC's [School Health Index](#), specifically the Physical Education and Other Physical Activity Programs module (Module 3)
- [Action for Healthy Kids School Health Index](#) which is used as an assessment of a school's readiness to apply for USDA's [HealthierUS School Challenge: Smart Lunchrooms](#) (HUSC:SL)

The Action for Healthy Kids, Let's Move Active Schools and the Alliance for a Healthier Generation's assessments mirror the School Health Index. Schools might already have engaged in one of these assessments within the two previous school years. Conducting these assessments assists schools by helping them create action plans, connect to resources and funding opportunities, and potentially apply for national recognition.

AFHK recommends that ISBE promote Enhanced Physical Education (EPE), an evidence-based intervention recommended in the CDC's Guide to Community Prevention Services, which is defined as programs that increase the length of, or activity levels in, school-based physical education classes. AFHK also recommends that ISBE promote the CDC's CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school.

Additionally, AFHK recommends that needs assessments ask schools if they are eligible for the "Community Eligibility Provision" for school meal programs, and if they are, if they are taking the option. Including this question about the provision will help schools identify potential food and nutrition benefits for their students that they can leverage to promote health.

In addition, AFHK endorses these further recommendations for Section 3:

Section 3.1 A. On p. 18, it states that ISBE's vision, mission and goals "describe a system where by children are able to develop their interests, talents, and sense of self supported

by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college.” AFHK endorses the belief that statement does not adequately reflect the goal that every school offer a safe and healthy learning environment for all students (p.37). AFHK endorses the suggestion that this statement be rewritten to add “have the opportunity to be healthy and developmentally successful” and to read as follows: ISBE’s vision, mission and goals “describe a system where by children have the opportunity to be healthy and developmentally successful and are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college.”

Section 3.3 B. On p. 48, ISBE indicates that they will use 95% of these funds to “provide assistance or conduct needs assessments, curriculum audits, equity audits and other diagnostic support services for LEAs and schools necessary to develop strong comprehensive and targeted improvement plans.” AFHK recommends that ISBE add student health and school wellness assessment to the list of types of assistance provided to LEAs and schools.

Section 3.3 D. On p. 49, AFHK endorses the recommendation of explicit inclusion of school health services in ISBE’s review of programmatic resource allocations that ISBE is required to do every three years by including in the statement “Gaps in the impact of funding supports and services, relative to allocation, for all students, relevant student groups and teachers” “supports and services, including health services.”

Section 4: Support Excellent Educators (p. 50 to 57)

Addressing Teachers Working Conditions: To be effectively taught, health and wellness should not be mere lessons, but rather a whole school adoption, and this should include teachers and other school employees. To this end, Title II funds can be used by states and school districts to conduct and publicly report on an assessment of educator support and working conditions that would be developed with teachers, leaders, parents, students and the community. For example, Title II funds could be used to develop and conduct an evaluation of teacher wellness levels to better understand teachers’ working conditions.

Along with providing positive examples for students, positive working environments are important for teacher retention and teacher productivity.

It is for these reasons that AFHK recommends that ISBE includes in the IL ESSA state plan an assessment of school staff’s working conditions, including as it relates to wellness promotion, to identify strategies to improve overall working conditions and improve teacher satisfaction and wellness, reduce teacher burnout and increase staff retention.

4.2 A. Support for Educators: Resources to Support State-level Strategies (p.52-53)

In the 2nd Draft’s description of state-level strategies to support educators, ISBE proposes a long list of professional learning opportunities for instruction leaders including some issues relating to student health, specifically “trauma and behavioral health issues, restorative practices” as well as developing resources related to “school conditions and school climate.” Student physical health is not mentioned. Given the rising prevalence of health issues among students, it is important to prepare teachers and principals to identify and address these issues in school. Research indicates that teachers and principals spend an average of one hour per day on student health issues—roughly 180 hours of time per teacher or school leader over the school year—which makes addressing these health issues a firm reality of their jobs.^{5 6}

AFHK recommends that the IL state ESSA plan include a specific mention of student’s physical health and needs.

While not taking part in direct medical care, teachers and other school leaders should be prepared to support, reinforce and complement in the areas of physical health through training fostering the connection between health and learning in the classroom. Teachers and school leaders can play a significant role in creating healthy school culture that promote physical activity and nutrition, and should have the appropriate professional learning opportunities available to help them do so. To that end professional development opportunities to consider include:

- Professional development opportunities for administrators to help them understand and communicate the movement/improved learning outcomes connection, as well as the way that is linked to fitness testing
- Professional development opportunities for physical educators on implementing high quality PE programs
- Professional development resources for integrating physical activity in the classroom

Finally, ISBE should work with partners to offer professional development to educators, including many that are free for participants. Groups such as Action for Healthy Kids and the federal government, offer a wide range of opportunities, including webinars, podcasts and in-person training sessions, which ISBE could actively promote and facilitate school personnel participating in.

4.2 B. Skills to Address Specific Learning Needs. (p. 54)

In this section, the 2nd Draft identifies how the SEA will improve the skills of teachers, principals and other school leaders in identifying students with specific learning needs and providing instruction based on the needs of such students. AFHK appreciates ISBE including the need to support educators and others in addressing student behavioral health

⁵ Hill, N. J., & Hollis, M. (2011). Teacher time spent on student health issues and school nurse presence.

Journal of School Nursing, 28(3), 181.

⁶ Baisch, M. J., Lundeen, S. P., & Murphy, M. K. (2011). Evidence-based research on the value of school nurses in an urban school system. Journal of School Health, 81, 74-80.

issues, but given the rising prevalence of student physical health needs, AFHK further recommends including physical health as well as behavioral health.

Section 5: Supporting All Students (p. 57-108)

5.1 B. Equitable Access to a well-rounded education

In the discussion about how to achieve equitable access to a well-rounded education, the 2nd Draft identifies the factors that can contribute to the conditions for learning. AFHK appreciates ISBE's inclusion of "the development of academic, social, emotional, behavioral and physical competencies" (p. 61), but also suggests that the "supportive environments" be further defined to be in alignment with the CDC's definition of a school environment that supports the whole child.

In addition, the discussion about barriers to learning and teaching should include "physical" as well as behavioral "health" (second bullet on the top of p. 61)

Any definition of what to include for determining a well-rounded student needs to take into account the whole child and recognize that school-wide health and wellness efforts are not only supportive of academic standards achievement, but are promoting healthy and wellness practices that students can use for the rest of their lives.

5.1 C. School conditions for student learning

The 2nd Draft identified the type of assistance that ISBE will provide to LEA's to improve the conditions of student health and learning. The 2nd Draft says (p. 62) that "ISBE will support local districts receiving assistance to improve school conditions for student learning by providing professional learning opportunities to work directly with these districts on the implementation of specific evidence-based practices for improved academic, social, emotional, behavioral, and physical student outcomes." AFHK believes the plan will be stronger if the final part of the sentence be changed to say "and physical health student outcomes."

The 2nd Draft has a long list of "current professional learning opportunities." AFHK endorses the recommendation that the IL state ESSA plan explicitly say that "ISBE will develop and provide additional training to meet the needs of LEAs."

The paragraph (p. 63) that discusses Title IV, Part A (p. 63) needs to include support for student physical health needs.

AFHK continues to recommend that ISBE adapt the plan to better recognize and address negative health and wellness issues facing students and need, in some cases, greater school-based whole child health and wellness interventions to create an equitable academic environment. In other words, ISBE should see the health and wellness hurdles faced by students as obstacles to equitable access to well-rounded and supportive education for students and then work with schools to have in place strategies and

resources to counter those hurdles with school-based whole child health and wellness efforts.

5.1 E. Parent, family, and community engagement

The 2nd Draft makes little change to this section (pg. 64-67). It continues to encourage involvement of students, families, and community members on school health/wellness teams. Additionally, schools should be motivating students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity. Both of which AFHK continues to support.

That being said, the 2nd draft continues to not fully recognize that the major component of effective community involvement revolves around data and organizations being able to see where schools are in need of assistance in what areas. To this end, AFHK continues to strongly recommend that Illinois use standardized reporting of data in schools that can then be shared with organizations, such as AFHK and the Every Kid Healthy Coalition, so that community partners can identify and highlight success stories, while matching available resources to schools identified as being in need of assistance.

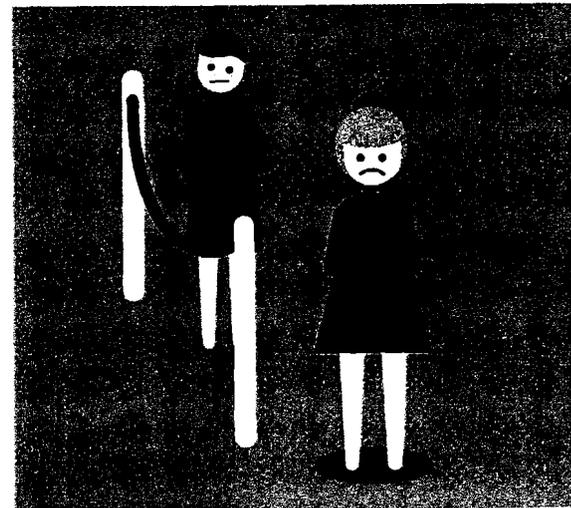
5.1 G. Other state-identified strategies

In the discussion on p. 68 regarding the plans that LEA's are required to submit, the 2nd Draft lists the required components that LEA's must address. AFHK recommends that ISBE also require each plan to include how the LEA will support student access to a healthy school environment as defined by the CDC's Whole Child model.

As indicated throughout our comments, whole school health and wellness practices focused on the whole child are not only support of academic success, they are learning in and of themselves and their successful incorporation and implementation are important aspects of a well-rounded student. A well-rounded student is one that has learned healthy practices that they can then apply for the rest of their life. Thus we strongly recommend that recognizing and incorporating health and wellness promotion into how Illinois defines and measures what it means to work toward a "well-rounded student."

Conclusion

Action for Healthy Kids is grateful for this continuing opportunity to comment on Illinois' proposed state ESSA plan to update our state system for educational accountability, school improvement, and educator preparation, support and retention. Illinois' longstanding commitment to student achievement, health and development and for taking action to support students, and AFHK urges continuation and enhancement of this commitment to giving student physical health the same attention and priority as is being given to the importance of student's social and emotional learning and development. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.



More than 404,000 Illinois kids are enrolled in afterschool, but **741,000** are waiting for an available program



YES! I'm a proud supporter of afterschool and summer learning programs. I believe they are critical to Illinois' ESSA state plan for providing a well-rounded education for students.

Afterschool matters to me because...

Because...

Name: Donna Davis

Physical Address: 1234 Main St

Personal Phone: 708-555-1234

Personal Email: ddavis@email.com

ACT Now Coalition | www.actnowillinois.org | @ACTNowCoalition

I do not want to receive advocacy and policy alerts.



YES! I'm a proud supporter of afterschool and summer learning programs. I believe they are critical to Illinois' ESSA state plan for providing a well-rounded education for students.

Afterschool matters to me because... I get to hang out with my friends and do homework and get help.

Name: Jonathan Rivera

Physical Address: 1500 S. 59th CT
CICERO, IL 60809

Personal Phone:

Personal Email:

ACT Now Coalition | www.actnowillinois.org | @ACTNowCoalition

I do not want to receive advocacy and policy alerts.



YES! I'm a proud supporter of afterschool and summer learning programs. I believe they are critical to Illinois' ESSA state plan for providing a well-rounded education for students.

Afterschool matters to me because... I lack basic estpau

Name: Keuren

Physical Address: 5504 LACON
AURORA, IL
60505

Personal Phone:

Personal Email:

ACT Now Coalition | www.actnowillinois.org | @ACTNowCoalition

I do not want to receive advocacy and policy alerts.



YES! I'm a proud supporter of afterschool and summer learning programs. I believe they are critical to Illinois' ESSA state plan for providing a well-rounded education for students.

Afterschool matters to me because...
a mi me importa
quedarme por que
necesito que me
tengan en cuenta las
matematicas y por
que la tarea.

Name: Diego Flores

Physical Address:
1500 S 59th Ct
Cicero, IL 60804

Personal Phone: _____
Personal Email: _____

ACT Now Coalition | www.actnowillinois.org | @ACTNowCoalition

I do not want to receive advocacy and policy alerts.



YES! I'm a proud supporter of afterschool and summer learning programs. I believe they are critical to Illinois' ESSA state plan for providing a well-rounded education for students.

Afterschool matters to me because...
I have fun

Name: Heatheryn

Physical Address:
1500 S. 59th Ct
Cicero, IL 60804

Personal Phone: _____
Personal Email: _____

ACT Now Coalition | www.actnowillinois.org | @ACTNowCoalition

I do not want to receive advocacy and policy alerts.

December 27, 2016

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777
essa@isbe.net

RE: Comments on the second draft of ISBE's ESSA State Plan

To Whom It May Concern:

Advance Illinois advocates for a healthy public education system that prepares all students for college, career, and democratic citizenship. We are an objective voice that is student-centered, equity-driven, and data-focused and connected to community and educators. We are committed to supporting and improving Illinois' academic performance and greatly appreciate the opportunity to offer feedback as the Illinois State Board of Education develops a fair, clear, and supportive plan for the implementation of ESSA. Our comments on the draft plan are organized below.

Advance Illinois has been involved with the P20 Council's process of commenting on the State Board draft plans. We are encouraged by the comments and considerations being developed through the P20 Council including from the Data, Assessment, and Accountability committee, the Teacher and Leader Effectiveness committee, the College and Career Readiness committee and the Early Learning Council, which has been working in coordination with the P20 Council. We hope that these considerations will be given full attention by the State Board. We will note in the plan below where we have agreement with the discussions occurring in those committees.

Section 1: Consultation and Coordination

1.1 TIMELY AND MEANINGFUL CONSULTATION

While we appreciate the opportunity to comment on the plan, we are concerned that the next version of the plan will be submitted to the Governor without another public comment period. This is concerning because while Draft 2 of the plan clearly is intended to solicit feedback, it does not articulate definitive architecture in numerous places. It is important that the stakeholders and the public can comment on the actual plan with more detailed definition in those areas where the state is still determining its course of action before it is submitted.

Section 2: CHALLENGING STATE ACADEMIC STANDARDS AND ACADEMIC ASSESSMENTS

2.1 CHALLENGING STATE ACADEMIC STANDARDS

We encourage the state to continue to consider the summative assessments as part of a holistic assessment system that includes formative assessment. We encourage the state to continue to provide tools and supports that allow districts to improve their use of assessment data and help districts to align pedagogy to the skills and competencies students need to achieve to be successful in college and career readiness, as indicated through multiple measures which include a statewide standard assessment.

2.1.C and 2.2.A) We also are encouraged that the state board will review the required cut points for EL reclassification as part of the ACCESS exam. With increased English Language proficiency required for successful completion of the state’s PARCC assessments (and possibly other assessments adopted by the state) an increase in cut point is possibly necessary to ensure that scores from PARCC assessment are understood with as much context as possible. In addition to improved cut points, we also encourage the State Board to consider offering the state assessment in student’s native language.

Section 3: ACCOUNTABILITY, SUPPORT AND IMPROVEMENT FOR SCHOOLS

3.1 ACCOUNTABILITY SYSTEM

The state board’s plan for accountability continues to evolve and this version of the plan provides significant opportunity for discussion of different options.

The state continues to develop the plan based on its vision, mission, and goals. We hope that the state will continue to consider how the plan connects a preschool to career system and how its goals align with the goal of the P20 Council of 60 percent of Illinoisans with a high-quality credential by the year 2025. In addition, the State’s plan notes that “every child in the public system in Illinois deserves to attend a school wherein she or he is prepared to enter the workforce or college.” We believe all children should be prepared for the opportunity to choose to go to college AND a career, even though not all children will choose to go to a traditional four-year college or immediately into a career. We encourage the state board to consider this as it further develops its plan.

We are supportive of the school quality indicators as discussed by the Data, Assessment and Accountability (DAA) subcommittee of the P20 Council. We believe that the state board should attempt to include all the measures that received significant support by the DAA committee into the ESSA plan. We note that while modifications are necessary to the state’s existing survey tools in order to include Student and Teacher voice, the current tools provide a valid and reliable tool for capturing important school conditions such as Academic Rigor, Student Support, and Community Engagement.

The following tables are from the draft P20 DAA comments and capture the support that each of the school quality measures with significant support received during those discussions. The P20 council plans to submit a report on its discussions in early January.

| Elementary School Indicators | Support |
|-------------------------------------|----------------|
| Arts Participation | 58% |
| Chronic Absenteeism | 75% |
| Early Grades Indicator & Weight | 67% |
| Science achievement | 56% |
| Student Voice | 63% |
| Teacher Voice | 71% |

| High School Indicators | Support |
|-----------------------------------|----------------|
| Arts Participation | 58% |
| Chronic Absenteeism | 81% |
| College and Career Readiness | 81% |
| Freshman On Track (Early Warning) | 65% |
| Science achievement | 62% |
| Student Voice | 63% |
| Teacher Voice | 71% |

Advance Illinois has participated in the conversation of the College and Career Ready Indicator Framework at the P20 Council’s subcommittee on College and Career Readiness. As noted above, we also are supportive of using this definition to develop a metric for college and career readiness in the accountability system. However, at this time, we would recommend that the Framework continue to be reviewed and that a collaborative process is used towards its development. As has been discussed by the committee, we believe that all students would benefit from career experiences in high school and an opportunity to choose and explore a career area or cluster. We see the value in this choice, not in that students are likely to pursue the career, but rather that process of career identification provides the adaptive skills and agency that is required to be successful in any career.

In addition, we encourage the State Board to work with partners in higher education, including community college, to ensure that the college readiness portion of the framework aligns with the rigor of college expectations. While, the State has worked hard to improve the transparency of expectations, there is still some alignment work to be done. Partners from pre-kindergarten through high-school have worked to set clear expectations for students but ultimately postsecondary is still final arbiter of college readiness. This is evidenced by the rigor of credit-bearing courses. Our obligation is to provide students with a vision of readiness that is aligned with the expectations of credit-bearing college coursework. To do otherwise is a disservice to students.

Student Growth, Indicators, and Weighting of Indicators

We appreciate the state’s detailed discussion of the accountability system, including the use of growth metrics, school quality metrics, and how different metrics can be weighted and used to provide information both at a summative level and at an individual metrics level. These are complex issues that interact significantly with each other. Below we have provided thoughts on how these issues might be balanced. However, we want to highlight a few considerations:

- Proficiency rates are important information about the *students* in a school but do not provide particularly clear information about the performance of a *school*.
- Student growth should be a considerable weight in the accountability system, recognizing that academic progress is a critical measure of school performance.
- Whether or not students are making progress towards a standard is a critical piece of information about whether the school needs additional support.
- Whether or not students in a school are making progress similar to comparable students at other schools is critical information about the type of support necessary at the school.
- School quality and student success metrics that are not based on math and English assessments are useful to provide additional context regarding school performance, but should not mask whether a school’s students are making academic progress.
- English Language and “subgroup” performance should be highlighted in order to ensure that all students receive the support they need and make the progress necessary to achieve proficiency. (see our prior comments for possible approaches).
- Summative rating for schools should clearly indicate that this metric cannot be used independently of the underlying metrics when determining the type of support that school should receive.

With these considerations in mind we prefer a model of accountability that uses multiple growth measures and a summative rating. If the growth measures need to be collapsed into a single metric for purposes of the federal law that should be done, but it will also be useful to report on each measure individually. If it is necessary to create a single metric from the two different types of growth, we propose that each growth metric be weighted equally.

We also believe that academic measures should be more significantly weighted than the school quality metric. While it is difficult to make a firm recommendation without simulating the impact of the weights, we lean towards the example that recommended 70% academic measures and 30% school quality metrics.

The state plan currently proposes weighting the academic measures all equally (for example if the academic measures make up 60% of the total system, then growth, proficiency and English Language Proficiency would each be weighted 20%). Our recommendation is to not weight the metrics equally. Rather, given the considerations above we would weight proficiency at less than growth. Finally, given the uncertainty of the ELP metric, we recommend that it be no more than 15% of the overall weight (though, it should certainly be no less than 5% and probably should at least be 10%).

Meaningfully Differentiating Schools

Deciding whether the state should have a summative rating for districts that are not in need of a comprehensive or targeted support is complex. While the State must provide clear information to parents about success and challenges that students face, the question of school quality and its contribution is not easily boiled into a single rating. Integrating multiple measures into a single view can result in a loss of information about any one of the measures being examined. The complexity of how this information is represented is further complicated by the manner in which the data will be used by parents, families, and the State Board. If the data is used to drive supports, the critical issue is which schools need support to help students succeed. If the data is used for intervention or punitive action, the critical issue is which schools are failing to support students adequately relative to their peers.

Recognizing that the goal of the State Board is to develop a non-punitive system, while also recognizing that the state is moving from a system that many saw as overly punitive (and possibly more importantly, simply unfair), we recommend that the state develop a system that provides as clear a set of information about schools as possible.

The state should have a summative rating for schools, but the language used should provide information about the context of the school and should transparently demonstrate how the rating was established.

The most important information for a school and its community is whether the students are making academic progress that will allow them to meet proficiency standards (including progress towards excellence for those students that already are meeting proficiency). This is more important than whether the students are currently proficient, which has a strong relationship to their academic ability before they enter the K-12 system.

If a school is not able to support its students towards proficiency, it needs additional support. In the past, there have been significant concerns about using a metric like proficiency that is likely correlated

with the socio-economic demographics of the school. This is particularly pernicious if the identification leads to punitive action. However, given the goal of a “non-punitive” system, this information provides the community with the information necessary to advocate and provide more support.

Proficiency alone is not a good rating. We believe a student’s academic progress (i.e. growth) is one of the most useful and fair metrics for a summative rating. While the students at a school may not be making the progress necessary to reach proficiency, it would be unfair to expect a school to do significantly more with students than its peers (especially if the school has significantly less resources). In fact, we believe a school where students are making academic progress that outpaces the academic progress of similar students across the school is a “good” school even when students are not making the academic progress necessary towards proficiency. These schools may need additional support, needs assessments, or community conversations to ensure that students reach proficiency.

In addition, further information about school quality is useful to provide a picture of the underlying effort towards school improvement. The climate of a school may be a leading indicator for improvement when the academic factors are yet to improve. Most research suggests that academic performance will improve when these other factors are attended to. Success on school quality should not be able to mask student progress - but it is an important factor in determining whether a school is on track to see further progress in the future. Since this information is likely to be multi-faceted it can also capture whether schools are having success with students beyond academic progress. While this should be considered in assessing a school’s overall quality it should be weighed carefully against academic progress.

It is critically important for the system to provide clear information about the success that schools are having with English Learners and with distinct demographic populations within the school, including low-income, African American, Latino and Special Education students (i.e. “subgroups”). First, it is worth knowing whether the overall performance of these populations is in-line with the overall student body. Second, it is important to know whether these groups are making the progress they need to achieve proficiency. It may be that this growth will need to be quicker than the growth for the entire student body (for example, low-income students on average have lower proficiency rates than non-low-income students in Illinois). If a school’s students are not able make this progress, the school may need additional support to help these student populations.

Proficiency as part of the school rating system (as opposed to growth towards proficiency) provides a limited amount of information. In particular, proficiency rates provide numerous statistical issues and often fail to capture meaningful information about a school. We encourage the State Board to consider proficiency metrics that provide credit across student performance levels (in fact, if the State Board believes it can use a proficiency measure that considers students starting performance level e.g. a value table – this may be the most informative). We say this with a few caveats:

- It is imperative to know how protected “subgroups” of students’ are performing on proficiency levels in-line with other populations in the school - when they are not, growth for these groups will necessarily need to be greater than for other groups.

- It is not possible to have a growth measure in third grade because students will have only taken an assessment once and therefore proficiency at this grade level should be reported. In addition, schools should be making efforts towards improving third grade proficiency and a metric that captures improvement across different third grade classes would emphasize the need to improve on these metrics. Careful consideration should be given to the practices that this promotes in the schools, to avoid unintended consequences, in particular, over-focus on academics in the early grades.

Finally, the language for ratings based on each of these individual measures should be objective, but clear. Attached to this letter we provide some thoughts on possible language that could be used as part of the accountability system for both individual metrics and the summative rating. Currently, we find that the language being recommended by the State Board does not provide clear information to the public about the meaning of the metric regarding school performance (i.e. "initial," "growing," "meeting," and "exceeding").

3.2 IDENTIFICATION OF SCHOOLS

At this time Advance Illinois does not have enough information about the IL-EMPOWER system to make comprehensive comments on this section. We encourage the State Board to publish more information about this system so that stakeholders and others can have a clearer understanding of its use. We recommend that the state board provide a clear understanding of the link between performance levels on different metrics and the expected types of support and intervention. While this may not be necessary for the state's federal plan, a clearer understanding between metrics (including those that may be part of a needs assessment) and action is important for a high-quality accountability system with clear expectations.

From our discussions with districts we would also note the following areas of concern:

- *The state needs a clear commitment to implementation.* The state has taken on a number of initiatives over the years including improved educator evaluation and the new Illinois Learning Standards. Commitment to implementation of these initiatives is critical to their success even as focus is shifting on implementation of the accountability, supports and interventions system.
- *The state needs to commit to a comprehensive assessment system.* This includes not only a summative assessment system, but an interim, formative and diagnostic system that supports student learning and teacher professional development. The state is encouraged to do all it can to improve the tools available to support use of assessment data and the link between local and state assessments.

Our understanding of the current support system in Illinois is that it is based on lead partners and supporting partners. Each of these partners often has different frameworks for improvement. We recommend that the state develop and remain committed to its own framework for improvement and ensure that the needs assessment for the state and improvement efforts of partners leverage this framework. Districts and schools often must work with different providers and it is important to have consistency in this approach across providers. The IBAM school quality framework appears to be

working towards this model and ongoing discussion of the framework and its use is important conversation for the state.

Finally, while schools and districts will often need partners with different specialties for supports and the state cannot have capacity to support all the work necessary, the state does need to have capacity to monitor partners and to ensure that the protocols for engagement are adhered to when working with districts. Finally, any work that districts have already done should be given deference when improvement efforts have occurred unless there is clearly no improvement plan at the school or district level.

Section 4: Supporting Excellent Educators

4.1 SYSTEMS OF EDUCATOR DEVELOPMENT, RETENTION, AND ADVANCEMENT

We applaud the State Board’s plans to offer guidance for local professional development (PD) plans and require that LEA plans align with the Learning Forward’s definition of PD. We are also supportive of ISBE’s new data collection initiative that will result in transparency, accountability, and program improvement within the state’s educator preparation programs.

To better understand our subject-area and regional educator supply and demand issues so that educator preparation programs can address them, we urge ISBE to publish its Supply and Demand report annually and include regional shortage information as well as projected demand.

4.2 SUPPORT FOR EDUCATORS

We are supportive of the ISBE plan to offer “Grants to district/educator preparation program partnerships that focus on recruitment, support and extensive and extended clinical experiences.” Title II funds could be used for these purposes. We encourage ISBE to add the following elements to that grant:

- Focus recruitment efforts on increasing educator diversity.
- Incent the creation of both teacher and principal residencies programs. Principal residency programs could be tailored to increase the number of principals ready to lead schools that need a particularly high level of support.
- Incent the creation of residencies that are a full academic year, place student teachers with a high-quality and trained cooperating teacher, and address district shortage areas.
- While ISBE could move forward more support for both teacher residencies and principal residencies, we recommend that ISBE’s first priority be teacher residencies.

We also encourage ISBE to use Title II funds to increase the number of high-quality teacher leader systems within Illinois districts by providing seed funding for such systems to districts on a competitive basis. One of the teacher leader roles that the initiative could specifically create is a state-level teacher leader designation for ‘cooperating teachers’ and sample job description utilizing the job domains within the Teacher Leader Model Standards (TLMS).

We also encourage ISBE to use Title II funding and input from the stakeholders to establish a micro-credentialing system for teacher leaders in which they could be required to demonstrate both TLMS function competencies for their particular role as well as quantifiable results from their work.

As others commented on 4.A.ii, we encourage ISBE to continue to provide training for teacher and principal evaluators. We encourage ISBE to create a monitoring system and independent research that allows ISBE staff and policy makers to assess and improve the health of the state’s teacher and principal evaluation processes.

Finally, we would like the state board to make future district- and state-level Title II plans and expenditure information for Title II more easily accessible to the public.

4.3 EDUCATOR EQUITY

We are supportive of ISBE’s definition of an “ineffective teacher” from Draft One rather than the proposed definition in Draft Two. We are supportive of ISBE’s definition of “inexperienced teacher” in Draft Two, that is “a teacher with less than four years of teaching experience”.

Conclusion

In conclusion the state’s second draft plan has started to provide a framework for how accountability and support decisions will be made in Illinois. However, there are still many important decisions to make. We look forward to the state’s third version of the plan and hope that the State Board will consider allowing for a public comment period on a version that provides more detail about many of the critical decisions outlined in this plan.

Sincerely,

Ginger Ostro
Executive Director
Advance Illinois

Discussion of Ratings Language

The language for ratings based on each of these individual measures should be objective, but clear. For example, for a “growth to proficiency level” measure the language used to describe the meaning of the measure should be clear. For example (these categories could also be used for EL proficiency):

- The progress of students at this school is "significantly below" what is necessary for them to reach proficiency or exceed standards
- The progress of students at this school is "approaching" what is necessary for students to reach proficiency or exceed standard
- The progress of students at this school is "sufficient" to have students meet proficiency or exceed standard
- The progress of students at this school "exceeds" what is necessary to meet proficiency or exceed standard
- The progress of students at this school "significantly exceeds" what is necessary to meet proficiency or exceed standard

Similarly, ratings for comparative growth for students should be clearly delineated:

- The progress of students at this school compared to students with similar academic backgrounds is "significantly below" the progress of those students.
- The progress of students at this school compared to students with similar academic backgrounds is "approaching" the progress of those students.
- The progress of students at this school compared to students with similar academic backgrounds is "similar" to the progress of those students.
- The progress of students at this school compared to students with similar academic backgrounds "exceeds" the progress of those students.
- The progress of students at this school compared to students with similar academic backgrounds "significantly exceeds" the progress of those students.

These examples are not intended to be exhaustive or exactly what is necessary, but we recommend that the wording used to describe school and student performance communicate clearly the information the measure describes. Note that in the case of these examples, we have used slightly different language to capture the difference in the meaning of the measures (i.e. “similar” works in the context of comparisons – but “sufficient” is more appropriate in regards to meeting a standard).

Together the ratings for these individual metrics can be used to help describe the summative rating for schools, for example:

- This school likely "exceeds" a sufficient level of performance across most metrics
- This school likely "meets" a sufficient level of performance across most metrics
- This school likely "approaches" a sufficient level of performance across all metrics
- This school likely "under-performs" in one or more metrics
- This school likely "significantly under-performs" in one or more metrics

These descriptors may not align perfectly with a scoring system wherein a school may have more varied performance across measures, so the above is simply a suggestion. The critical point is that a summative rating can be developed that provides a summary of the underlying metrics and recommends further investigation of those metrics. We believe this strikes the appropriate balance of providing clear information at a summative level and respecting the information provided by each individual metric.

In fact, these ratings can be provided with clear instructions for their use. Language such as the following could be provided:

“School performance is complex and based on multiple factors. Schools may under-perform on metrics for a variety of complex reasons. We encourage families and community members to review the underlying data that generates these metrics to more clearly understand the reason for the school’s performance. Appropriate actions for a school can only be made based on the underlying factors of school performance and additional contextual information about the school.”

Finally, we encourage the state board to develop a dashboard that clearly shows how the school or district is performing on each metric and how this metric contributes to the overall score of the school.

Too often parents and communities have few options when a school is not performing at a level that will help students be prepared for college and career, however if the state provides clear direction on the appropriate actions given performance on a metric, the community can assess whether the action is occurring (with state support or without it) and advocate for changes in policy at the local level. While it is obviously non-trivial to align actions with a multiple measure accountability system (and, additionally, with the measures captured by a needs assessment) providing clear options for schools and the flexibility to choose amongst those options is a critical decision support tool.

Accountability, Support, and Improvement for Schools

How will ISBE use this unprecedented opportunity provided through ESSA legislation to create an accountability system where continuous improvement is at its core and improvement is a natural outcome?

To create an accountability system that fosters student and school improvement, ISBE should consider how it can move beyond limited or arbitrary measures to rate schools and where an historical perspective indicates has rarely helped schools improve. To ensure that accountability doesn't impede improvement, it will be of great value for Illinois to identify research-based measures that come together to tell a holistic story about how schools and their students are performing. These measures must provide enough meaningful information to help plan and implement appropriate and targeted supports. Dr. Linda Darling-Hammond, Professor Emeritus Stanford University, stated, *"If the goal of an accountability system is to improve education, it must raise expectations not only for individual schools but for the functioning of the system as a whole— and trigger the intelligent investments and change strategies that make it possible to achieve these expectations..."*

An accountability system must be much more than setting expectations. It must establish the processes and conditions to reach such expectations. Stated differently, if as a state we are serious about achieving success for every learner, we must create systems that are responsive to the personal journey every learner experiences. We need an accountability system that does not forestall improvements in school quality, teacher effectiveness, and student learning; but rather guides, supports, and ensures continuous improvement.

If we aren't intentional in our design to shift the focus away from compliance and toward commitment to continuous improvement for all Illinois' schools, it is entirely possible that we may wind up where we began—with the same kind of NCLB-era accountability system that does nothing to create sustainable change and institutional improvement throughout Illinois' classrooms, schools, and districts. Expedience should not lead us to recreate what we currently have or choose indicators based on what is easiest to measure. We need to create a system that gathers information about all aspects of what schools do (from teaching and learning to resource allocation to governance), reveals root causes of underperformance, and reflects the relationships between the strategies and actions that are implemented and the results they achieve. By developing information systems and feedback structures that identify strengths and weaknesses within schools and districts across these areas, Illinois can set the stage not only for identifying what is working, but also for changing educator practice where it matters most—at the classroom level. **An accountability system designed to have sustained impact must look at the factors that lead to success or are impeding the improvement efforts so that successful strategies may be further scaled and failing approaches may be modified or abandoned.**

The goal of a continuous improvement accountability system is to leverage multiple inputs and processes to achieve desired outcomes. Illinois would be well-served to design a system where when translated to schools and districts it empowers the school community and:

1. Acknowledges and adapts to the realities, complexities, and uniqueness of schooling.
2. Employs a systemic approach to actively assess, monitor, and improve at all levels with regard to key education factors and high-quality standards.
3. Ensures a holistic understanding of education quality through myriad reliable data and pieces of information, and uses these data to continuously drive and evaluate improvement actions and support services.
4. Provides transparency and accountability through a valid multi-metric, non-punitive representation of data and information.
5. Identifies, acknowledges, and engages all stakeholders.
6. Provides constant and consistent reinforcement, guidance, and accountability of all stakeholders and factors toward a shared vision.

A research-based continuous improvement system designed by ISBE and adopted statewide should, at a minimum, include:

1. Focus on root causes, not just outcomes.
2. See failure as a means to improve rather than a reason for sanctions.
3. Enable informed decision-making based on rich context and evidence.
4. Place the source of accountability and decisions about action for improvement within the system.

One of ISBE's most important roles is to empower local systems to make improvements. Thus, the accountability framework must be shaped in partnership with local educators and communities who are empowered to address their unique challenges as only they know what will work best to bring about desired results in student achievement. AdvancED advocates for local flexibility with an eye toward accountability to implement systems and processes that yield high outcomes for students. ISBE is encouraged to consider providing flexibility to Illinois' schools and districts to select national research-based continuous improvement processes as options to address the state's accountability framework. Again, if we are committed to every child's success, and we are, we must thoughtfully craft and intentionally execute accountability systems that guide, support, and ensure continuous improvement. The learning process for every school, like every child, is a personalized journey of continuous improvement.



AMERICAN INSTITUTES FOR RESEARCH®

Superintendent Tony Smith, PhD
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Dear Superintendent Smith,

American Institutes for Research (AIR) is grateful to enjoy a long-standing partnership with the state of Illinois. The document that accompanies this letter details the AIR-operated centers that can provide a variety of supports as the Illinois State Board of Education (ISBE) finalizes and implements the state's Every Student Succeeds Act (ESSA) plan. Given the breadth of AIR's work throughout the nation, we have a wide range of expertise available to the state through our support centers. However, for the purposes of this document, **our formal comments are limited to accountability**, which is the foundation upon which the implementation of the plan will be measured; **the proposed multi-tiered systems of support; and the section on college and career readiness** because we are most knowledgeable about these issues given of our extensive work in the state.

This cover letter provides a summary of our comments that are detailed in the pages that follow.

Accountability: Well-designed accountability systems are critical for assessing a school district's effectiveness in creating a successful learning environment. Our teams have learned that providing opportunities to measure success using multiple factors beyond student achievement helped districts and schools better determine whether they were effective in creating a successful learning environment. Although the current draft addresses multiple indicators, certain measure-level design issues, if addressed, can further promote equitable access to coursework and resources. This memo includes suggested additions and changes that can greatly strengthen Illinois' accountability plan with respect to the following:

- Chronic absenteeism and/or daily average attendance
- College and career readiness (Advanced Placement, International Baccalaureate, and career and technical education)
- Social-emotional learning
- Postsecondary indicators
- Well-rounded education

Multi-tiered system of support: AIR has partnered with the state to operate the Illinois Center for School Improvement (Illinois CSI). Illinois CSI currently offers a multi-tiered system of support that is accessible to all districts throughout the state, regardless of their status, where, over the last five years, we have learned many lessons that can aid the state in continuing its supports to districts and schools.

Critical highlights include the following:

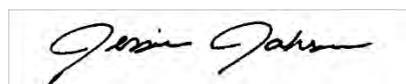
- It is important that the design and delivery of supports for a school are coordinated at the district level.
- There are multiple ways that needs assessments can play a role in developing, implementing, and monitoring improvement plans.
- Differentiation of supports to districts and schools is challenging but critical for success.
- Sustained support is important, especially for the lowest-performing schools and districts.

College and career readiness: AIR has demonstrated its understanding of Illinois' college and career readiness efforts through its 2015 evaluation of the Illinois Pathways Initiative, which supported science, technology, engineering, and mathematics (STEM)-related programs of study. We provided feedback for how Illinois can strengthen this public-private education partnership so that more students could participate in career pathways systems. Effective career pathways include a system of coordinated, connected programs of study leading to multiple opportunities to earn industry-recognized credentials and degrees within in-demand industries and careers. With respect to college and career readiness, AIR has two recommendations to improve the portion of the draft plan to align career pathways across K-12 and postsecondary education:

1. Align college and career pathway systems with career and technical education.
2. Add career indicators that promote an aligned P-20 system

If you or your staff have questions regarding our comments, I am happy to connect you to the right expert on our team.

Sincerely,



Jessica Johnson

Vice President, Professional Services

This section outlines detailed comments and descriptions of the topics mentioned in the brief letter.

Accountability

Well-designed accountability systems are critical for assessing a school district's effectiveness in creating a successful learning environment. Using a stakeholder's engaged needs assessment process to identify the factors that need to be monitored and measured for school success can create a highly effective system of accountability for a district and its school(s).

In its draft Every Student Succeeds Act (ESSA) plan, Illinois appropriately identifies performance and behavioral benchmarks all along a student's Pre-K to high school educational continuum (per "identified" indicators on page 20 of Illinois's State Plan Draft 2) for high-stakes, school-level accountability; however, certain measure-level design issues, if addressed, can further promote equitable access to coursework and resources. AIR provides specific recommendations for suggested additions and changes that can greatly strengthen Illinois' accountability plan.

Following are specific recommendations with respect to the topics outlined above:

Chronic absenteeism (CA) and/or daily average attendance (ADA). One primary caveat of a CA measure is the fairness of comparing schools across a measure that is largely dependent on out-of-school factors. Should Illinois choose to use this measure, the state should take the following three steps:

1. Embed statistical controls for socioeconomic status in CA calculations.
2. Provide and support the creation of robust guidance on using this measure because of the relative lack of control that schools have over out-of-school factors. This should include clear research-based guidance on preventing and responding to low CA measures.
3. Do not allow ADA to be used in place of CA. ADA has been shown to fail to differentiate meaningfully between low- and high-performing schools (both may have high rates). Schools can have a high number of chronically absent students while still exhibiting high ADA rates.

College and career readiness (CCR). The CCR indicator is a meaningful inclusion; however, the following recommendations will help to optimize the impact of this data:

- Include **separate measures** of Advanced Placement (AP), International Baccalaureate (IB), and career and technical education (CTE) engagement in the overall CCR indicator. Schools should avoid calculating in a single measure "the percentage of students who participate in *either* AP/IB or CTE." Coherent theories of action around these measures require distinct data sets for planning and evaluation.
- Add an additional indicator for participation and completion of a CTE **program of study**. Career pathways encourage students to participate in a coherent and aligned program of study within a recognized career cluster that includes both classroom and workplace learning opportunities. Completing a component of an existing CTE program of study encourages further alignment between K–12 education and CTE.

- Pair **participation and performance** measures wherever possible, assigning equal weights to each (e.g., AP/IB performance = 2.5% and AP/IB participation = 2.5%). If performance only is used, then only high-achievers may be encouraged to participate. If participation only is used, then students may be indiscriminately encouraged to participate without consideration for their readiness levels.
- Improve the measurement of subgroup readiness by addressing the challenge of **meeting n sizes**. Do this by either (a) combining denominator data across multiple years to meet n-sizes, as allowed under ESSA rules, or (b) using graduation cohort size for the denominator of performance calculations instead of, for example, advanced coursework participation or test-taking counts.

Additional considerations:

- Social-emotional learning (SEL) is appropriately excluded from high-stakes accountability; however, given the importance of SEL to academic performance and future employability, it is recommended that Illinois develop a long-term plan for its inclusion in comprehensive accountability. Initially, include SEL in school-level needs assessment. Over the longer-term, use these data to plan how to include it in annual reporting and potentially, high-stakes accountability.
- The exclusion of postsecondary indicators from high-stakes accountability is defensible; however, as postsecondary success is the ultimate goal for students, postsecondary attainment and persistence data should be collected for annual reporting and evaluation purposes. Compare it with accountability results over the long term to calibrate accountability system indicators and weightings on a periodic basis.
- Illinois should embed support for a well-rounded education (WRE) into accountability, in order to mitigate the well-known narrowing effects that limiting academic accountability to statewide assessment results can have on curricula and instruction. Because ESSA does not prescribe the content of a WRE, Illinois should formulate its own definition and embed, at minimum, a school-level indicator of access to coursework and/or relevant resources, for courses such as:
 - Science, technology, engineering, and mathematics (STEM) courses, including Algebra II, Physics, and Computer Science
 - Physical education, nutrition, and other courses or counseling promoting positive physical and mental health
 - Arts and music
 - Advanced coursework including AP/IB, dual/concurrent coursework, and early college
 - Experiential learning opportunities

Multi-Tiered Systems of Support (MTSS)

Services from the MTSS must be aligned to the larger goals and priorities of the state and must address the individual priorities identified through district and/or school-level needs assessments. This task sounds simple, but in our experience, this alignment can be challenging. It requires both internal alignment within the state agency as well as understanding and commitment on the part of the service providers, districts, and other school operators.

- Lack of alignment can cause redundancy or competition among plans and priorities resulting in many disparate initiatives at the school level.
- Lack of alignment can also lead to redundancies among service providers and/or a failure to optimize resources for schools.

It is important that the design and delivery of supports for a school are coordinated from the district level.

- Schools plans that are not supported by the district goals and resources have a lesser chance of being fully implemented successfully.
- Placing responsibility for technical assistance at the district or school level has not proven to promote immediate and long-term transformation due to the lack of collaboration and communication between schools and districts leaders. Technical assistance should be provided at all levels, district, school, and instructional to effectively implement a strong improvement plan. Furthermore, districts are more likely to be successful if they support all staff while building the capacity and specific skills for those working more closely with subgroups.

There are multiple ways that needs assessments can play a role in developing, implementing, and monitoring improvement plans.

- The needs assessment should include a root-cause analysis to identify the underlying causes of problems within the district. It can then serve as the foundation of the district and school improvement plan. The supports for identified schools in the plan should be derived from the results of an engaged needs assessment process.
- The needs assessment process should account for all district schools regardless of their comprehensive and/or targeted identification. The needs tend to be universal, not isolated to one school or subgroup.

Differentiation of supports to districts and schools is challenging but critical for success.

- From our operations of the Illinois Center for School Improvement, we have learned that an investment of time is required to establish a statewide system that serves the unique needs of districts and schools in urban, suburban, and rural parts of the states. However, in doing so, critical relationships are forged that are necessary ingredients for an effective partnership between the state, districts, and schools.
- With regard to supports for schools and districts, we have learned the following lessons:
 - Aligning technical assistance, which includes coaching from support liaisons to differentiate meaningful support, is essential to the implementation of a plan.

- External partners should not be brought in with “canned” plans and/or programs, but the plans should address the needs identified by the district.

Sustained support is critical, especially for the lowest-performing schools and districts.

- Creating a plan and implementing a plan are very different tasks. Without the push to consistently review and monitor progress, school teams were not successful in implementing well-developed plans.
- Support for districts currently receiving Priority and Focus services has varied based on the outcomes of the needs assessment. Some school districts had already started the transformation process as we began our work with them and only needed a “light” touch, whereas other districts were at the beginning of the journey and needed more sustained support.

College and Career Readiness

AIR has demonstrated its understanding of Illinois’ college and career readiness efforts through its 2015 evaluation of the Illinois Pathways Initiative, which supported STEM-related programs of study. We provided feedback for how Illinois can strengthen this public–private education partnership so that a greater number of students could participate in career pathways systems.

- **Align college and career pathway systems with career and technical education.** A college and career pathway system should allow students to build upon their knowledge, skills, and abilities over time, resulting in an industry-recognized degree or certificate with the opportunity to advance through further education and training. The current draft pathway system does not allow students to progress toward a defined pathway so much as it allow students to combine a variety of indicators into a bundle that may or may not be desirable by colleges, universities, or employers. AIR suggests that ISBE add academic and career metrics supported by key stakeholders including CTE programs and business and industry representatives that students can achieve throughout the middle grades and high school. Metrics, such as enrollment in a CTE course that already appears on the Illinois Report Card, could be determined through existing partners, such as the Illinois P–20 Council. Such a system would prepare students for postsecondary degrees and certificates that align with the specific career pathways.
- **Add career indicators that promote an aligned P–20 system.** Career pathways encourage students to participate in a coherent and aligned program of study within a recognized career cluster that includes both classroom and workplace learning opportunities. The draft career indicators offer opportunities to support aligned career pathways. The current career indicators outlined in draft 2 of the ISBE state plan omit participation in an existing program of study within a recognized career cluster. The draft career indicators currently includes an “industry credential,” which is a key component of the career pathways system in Illinois. By further emphasizing that these credentials align with priority career clusters, ISBE can better align its career technical education and college and career readiness systems. The “workplace learning experience” provides another opportunity to align systems of education. Tying the learning experience to an existing program of study within a recognized career pathway will ensure that students receive proper support from the career and technical education system in Illinois.



Every Student Succeeds Act

Looking Under the Hood at the Illinois State Plan

In September 2015, the Illinois State Board of Education (ISBE) released the first draft of its Every Student Succeeds Act (ESSA) plan along with a comprehensive *Reader's Guide* to help stakeholders review the plan. In addition, ISBE has established a webpage (<http://www.isbe.net/ESSA/default.htm#ESSA>) that contains updates and extensive information on the implementation of ESSA. The U.S. Department of Education (ED) sent a draft template to the state education agencies, and the state plan is based on this template. (The template is still being finalized.)

The state plan declares, “The vision, mission, and goals of the Illinois State Board of Education describe a system whereby children are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school system in Illinois deserves to attend a school wherein she or he is prepared to enter the workforce or college.”

Through its responses on the following sections from ED’s draft template for state plans, the Illinois state leaders shared the approach they are developing to deliver on its mission.

The Illinois state plan follows the following five sections outlined in ED’s draft template.



AIR Resources

American Institutes for Research (AIR) has long been a partner with state, district, and school leaders in Illinois. Our staff is continuing to discover ways to help and to develop resources to assist all states in developing their ESSA plans and implementing them. Although many of the following centers work directly with state agencies and leaders, there are many free resources on their websites that district and school leaders can use. We have identified the section of the Illinois ESSA plan to which each center is aligned.

The **Center on Great Teachers and Leaders (GTL Center) (Section 4)** serves as a resource to state and district staff members working on policies and supports for teachers and leaders. The GTL Center provides technical assistance and online resources designed to build systems that ensure the equitable access of effective teachers and leaders and recruit, retain, reward, and support effective educators (www.gtlcenter.org).

The **Collaboration for Effective Educator Development, Accountability, and Reform (CEEDAR Center) (Section 4)**, in which AIR is a partner with the University of Florida, helps states and institutions of higher education reform their teacher and leader preparation programs, revise licensure standards to align with reforms, refine personnel evaluation systems, and realign policy structures and professional learning systems (www.ceedar.education.ufl.edu).

The **College and Career Readiness and Success Center (CCRS Center) (Section 5)** helps states ensure that all students graduate from high school ready for college and career success. To support the work of states, districts, postsecondary institutions, and the business community in achieving this goal, the CCRS Center develops products and resources to support all stakeholders in implementing their college and career readiness initiatives (www.ccrscenter.org).

The **Illinois Center for School Improvement (Illinois CSI) (Section 3)** was created by ISBE and AIR to provide intensive support for Illinois districts with underperforming schools. The overall goal of Illinois CSI is to build the capacity of district and school leaders to transform their schools into environments in which all students achieve at high levels. Illinois CSI partners with district leaders, helping them build effective leadership teams and implement research-based best practices to ultimately drive higher student achievement (www.illinoiscsi.org).

The **Illinois Quality Afterschool Program (Section 5)** at SEDL (now a division within AIR), funded by ISBE, is designed to ensure that 21st Century Community Learning Centers grantees in Illinois receive the necessary assistance—including training, tools, resource materials, and expertise—to deliver high-quality afterschool programs that can strengthen student engagement and academic achievement (www.sedl.org/afterschool/iqa/index.html).

The **Midwest Comprehensive Center (MWCC) (Sections 1–5)** is a federally funded technical assistance center focused on improving state education agency capacity to implement strategies that improve educational outcomes for all students (www.midwest-cc.org).

The mission of the **National Center on Intensive Intervention (Section 5)** is to build district and school capacity to support implementation of data-based individualization in reading, mathematics, and behavior for students with severe and persistent learning or behavioral needs (www.intensiveintervention.org).

The **National Center on Safe Supportive Learning Environments (NCSSLE) (Section 5)** is funded by the U.S. Department of Education's Office of Safe and Healthy Students to help address factors that affect the conditions for learning, such as bullying, harassment, violence, and substance abuse (www.safesupportivelearning.ed.gov).

The **Regional Educational Laboratory (REL) Midwest (Sections 2–5)** is part of a network of 10 regional educational laboratories funded by the U.S. Department of Education's Institute of Education Sciences and focuses on national priorities such as college and career readiness, high school improvement, English learners, and data use to achieve the goal of improving student outcomes (www.relmidwest.org).

The **State Support Network (Section 3)**, an initiative launched by the Office of State Support within the U.S. Department of Education, is a technical assistance initiative designed to support state and district school improvement efforts (website expected in December 2016).

For more information about supporting ESSA in Illinois, please contact:

Jessica Johnson
Vice President, Policy, Practice, and Systems Change
Naperville Office Site Manager
630-649-6512
jjohnson@air.org

December 27, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #2

Dear Dr. Smith,

Thank you for the opportunity to respond to the second draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

The American Heart Association (AHA) is a national nonprofit organization that is dedicated to building healthier lives, free of cardiovascular diseases and stroke. The AHA advocates on policy that aims to help all children achieve a healthy lifestyle. To that end, we're advocating for physical education to be included in every state's ESSA plans. PE addresses the needs of the whole child, positively impacting their physical, mental and emotional health, making it a critical part of every child's education.

ESSA's recognition of the need for schools to support the whole child align with several AHA goals, specifically the importance of promoting physical and mental health and wellness, including:

- Implementing nutrition standards for school meals and competitive foods in all Illinois schools and after-school programs.
- Supporting initiatives to integrate physical activity into the school day, including daily high quality enhanced physical education, daily recess, classroom education that includes physical activity, and extracurricular physical activity programs.

The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy. In our comments, the AHA provides recommendations to the Illinois State Board of Education (ISBE) on improving the state plan, responses to the questions raised in the proposed Illinois state plan, and supplemental background information to justify our recommendations. Additional information is available upon request.

ISBE recognizes the connection between student health and education and has made important strides in supporting physical health and wellness. We urge you seize the new opportunity presented by the implementation of ESSA to further support student health and school wellness.

We appreciate the opportunity to comment on draft #2 and look forward to seeing ESSA fully implemented so that every child has the opportunity for a healthy and happy educational experience.

Sincerely,

Julie Mirostaw
 Director, Government Relations, Midwest Affiliate
 American Heart Association & American Stroke Association

Executive Summary: The AHA Recommendations

The AHA recommends incorporating student health and school wellness into Illinois’ state plan through the accountability system and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, the AHA recommends:

- Include **physical education** as a measure of school quality in Illinois’ state accountability system, and include this indicator on school report cards. The AHA recommends that ISBE standardize the measurement of physical education and require reporting the following measures in school report cards:
 - **The number of elementary school students receiving/schools offering the equivalent of 30 minutes of per day or 150 minutes per week of physical education;**
 - **The number of middle school students receiving/schools offering the equivalent of 45 minutes per day or 225 minutes per week of physical education per week and;**
 - **The percentage of schools requiring physical education for high school graduation.**
- Additional measurements that the ISBE should consider including in school report cards to better evaluate physical education include:
 - The percentage of students granted waivers, substitutions or exemptions from physical education,
 - The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
 - The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
 - The percentage of physical education curriculum that are aligned with state standards, and
 - The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

The AHA recommendations are related to the following sections of Illinois’ proposed plan, as well as sections that are pending public comment, including those related to accountability measures. Organized by content areas, the AHA recommendations will focus on:

| | Standards & Assessments | Accountability System | Report Cards | Needs Assessments | School Improvement/ Evidence-Based Interventions | Professional Development |
|---------------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------------------------------|--------------------------|
| Student Fitness/Access to Physical Activity | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | | | |
|-----------------------------------|--|--|--|--------------------------|--------------------------|--------------------------|
| Ensuring a Well-Rounded Education | | | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-----------------------------------|--|--|--|--------------------------|--------------------------|--------------------------|

Introduction: Illinois Should Integrate Health and Wellness into Education Policy and Practice

The Learning-Health Connection

The link between health and learning is clear: healthy, active, and well-nourished children are more likely to attend school, be ready to learn and stay engaged in class.

Despite widespread agreement on these facts, many school environments do not promote health. Too many students spend their days in buildings with unhealthy air, have limited opportunities for physical activity, and have inadequate access to fresh water, nutritious food or a school nurse. Many students come to school with one or more health problems that impact their ability to learn. According to the U.S. Centers for Disease Control and Prevention (CDC), the incidence of chronic diseases—including asthma, obesity, and diabetes—has doubled among children over the past several decades. This has implications not only for children’s long-term health but also for their opportunities to learn and succeed at school. Just as important, we know that students who achieve success in schools are more likely to achieve better health over their lifetime.¹

This challenge is especially critical in light of the nation’s vast health and educational disparities. Low-income and minority students are at increased risk of health problems that hinder learning. These students are more likely to attend schools with unhealthy environments and that do not invest in evidence-based prevention. Unless we address these disparities in health status and school environments, efforts to close the education achievement gap will fall short.

Illinois Policy Recognizes the Importance of Student Health and Wellness

The State of Illinois recognizes the inextricable link between health and learning. Existing state policies require or encourage schools to address a range of issues including social and emotional learning, school climate, physical education and fitness, chronic absenteeism, and discipline practices. In fact, one of the goals of the current state plan is for every school to offer a safe and healthy learning environment for all students.²

Physical Education: Illinois has been a leader in valuing children’s health, long requiring daily physical education (P.E.) for students in grades K-12. Since 2012, ISBE and the Illinois Department of Public Health have worked to promote “enhanced physical education,” an evidence-based strategy recommended by the CDC’s Community Guide to increase activity levels in or the length of school-based P.E. classes.

This work is based on the Illinois Enhanced P.E. Strategic Plan, a high-level roadmap to increase school-based P.E. and inspire a culture shift that makes high quality P.E. and wellness a priority for all schools and children. The movement is driven by a new understanding that high-quality P.E. is as important as math, science, or any other core subject because it correlates directly to the health and well-being of students for the rest of their lives.

As part of this work, in 2012, Public Act 97-1102 established the Illinois Enhance P.E. Task Force (EPETF), charged with promoting and recommending enhanced P.E. programs that could be integrated with broader wellness strategies and health curriculum in elementary and secondary schools, and revising the State Learning Standards on Physical Development & Health to reflect the rich body of neuroscience on the connection between movement and improved student outcomes, as well as aligning with current best practices.

¹ Health in Mind: Improving Education Through Wellness, a report by HSC and Trust for America’s Health, May 2012. Available at https://healthyschoolscampaign.org/wp-content/uploads/2015/07/Health_in_Mind_Report.pdf

² Illinois State Board of Education: Progress Report of the Comprehensive Strategic Plan for Elementary and Secondary Education. Available at http://www.isbe.net/reports/strategic_plan16.pdf

One of the EPETF's recommendations was to develop and utilize metrics to assess the impact of enhanced P.E. and measure the effectiveness of State Goal 20 of the Illinois Learning Standards for Physical Development and Health, which is to help students to achieve and maintain a health -enhancing level of physical fitness based upon continual self -assessments. This recommendation led to advocacy for Public Act 98-0859, which was enacted to implement fitness testing in Illinois starting in the 2016-17 school year.

Further demonstrating the state's commitment to the whole child, in 2011 Illinois recognized the need to incorporate health and wellness measures into the school report card by, as of 2016, requiring all Illinois public schools to report the average number of days of P.E. they provide per week per student.

Physical Activity: While physical activity (PA) is different from P.E. in that P.E. is a planned sequence of developmentally appropriate activities and games that educates students about and through movement, and is taught by qualified teachers who assess student knowledge, and motor and social skills to establish and sustain a healthy lifestyle, a school environment that provides comprehensive opportunities for PA before, during and after the school day is critical to ensuring students get the recommended 60 minutes of PA per day, as recommended in the Physical Activity Guidelines for Americans.

In 2007, ISBE codified this by establishing a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy.

ESSA: A new opportunity to support student health and wellness

ESSA presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting student physical and mental health and wellness.

Given the importance of student health and the key role that schools can play in promoting student health and wellness, incorporating health and wellness into Illinois' state plan in a comprehensive and integrated fashion will provide educators, policymakers and the public with a more complete understanding of how student health and wellness are impacting learning and academic outcomes and can serve as a decision-making compass, not stigmatizing parents and students or blaming districts/educators, but, rather, helping schools and school districts effectively drive improvement strategies. If accountability systems recognized the full experience of a student—including health conditions that might impede learning—educators could develop a more comprehensive understanding of student performance, and could deploy resources to schools and students at greatest risk. Parents and community members also benefit from knowing more about how their schools are supporting and promoting student health and well-being.

The AHA Responds to Illinois' Proposed State Plan: *Expanding the Opportunity for Illinois to Support Optimal Student Achievement, Development, and Health*

The AHA recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, the AHA recommends:

- Include **physical education** as a measure of school quality in Illinois’ state accountability system, and include this indicator on school report cards. The AHA recommends that ISBE standardize the measurement of physical education and require reporting the following measures in school report cards:
 - **The number of elementary school students receiving/schools offering 150 minutes of physical education per week,**
 - **The number of middle school students receiving/schools offering 225 minutes of physical education per week, and**
 - **The percentage of schools requiring physical education for high school graduation.**

- **To better evaluate physical education quality in schools,** ISBE should consider including the following measurements on report cards:
 - The percentage of students granted waivers, substitutions or exemptions from physical education,
 - The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
 - The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
 - The percentage of physical education curriculum that are aligned with state standards, and
 - The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

These recommendations are described below, aligned by the sections of the Illinois proposed plan.

Challenging Academic Standards and Academic Assessments (Proposed Illinois State Plan, p. 6): Expanding to Include Assessments of Health-Related Standards

ESSA requires schools to offer students a “well-rounded education.” The definition of well-rounded education includes health education, nutrition education, and physical education. In addition, each state plan must provide an assurance that the state has adopted challenging academic content and high quality student academic assessments in a number of subjects like math, reading or language arts and science and may develop standards and implement assessments in other subjects.

Illinois’ Accountability Support and Improvement for Schools

Accountability System and Indicators (Proposed Illinois State Plan, pp. 13-22): Include Physical Education Minutes and High School Graduation Requirement as Measures of School Quality and Student Success

According to the Physical Activity Guidelines for Americans, children require 60 minutes of physical activity daily for optimum health and well being, and physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during, and after school to ensure that their students are ready to learn.

The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use Fitnessgram assessments to measure students’ progress towards the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance, and muscular strength. School districts are required to report aggregate data to ISBE by May of each year.

Illinois’ State Report Card: Maintain Existing Health-Related Measures and Add Additional Measures

The AHA recommendations around school report cards are designed to reinforce and provide parents and others with information that creates a more comprehensive picture of a school's efforts for continual improvement around attendance and student fitness.

Illinois currently includes measures about physical education on the school report card, which the AHA supports maintaining. In addition, the AHA recommends that ISBE include additional measures on report cards which relate to the quality and implementation of physical education in schools:

- The percentage of students granted waivers, substitutions or exemptions from physical education,
- The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
- The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
- The percentage of physical education curriculum that are aligned with state standards, and
- The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

State Support and Improvement of Low-Performing Schools (p. 27-30): Ensure Rigorous and Comprehensive Needs Assessments and Evidence-Based Interventions

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools

Comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development, and health. ISBE can provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Fortunately, several publicly available tools also provide guidance on action planning to make improvements in the school environment. These tools include:

- The CDC's School Health Index, specifically the Physical Education and Other Physical Activity Programs module (Module 3).
- The Let's Move Active Schools baseline assessment (schools will have to first register for Let's Move Active Schools).
- The Alliance for a Healthier Generation Healthy Schools Program assessment.

Both the Let's Move Active Schools and the Alliance for a Healthier Generation's assessments mirror the School Health Index. Schools might already have engaged in one of these assessments within the two previous school years. Conducting these assessments assist schools by helping them create action plans, and connect them to resources, funding opportunities, and potentially for national recognition.

Design Evidence-Based Interventions Based on Findings

The AHA recommends that ISBE promote Enhanced Physical Education (EPE), an evidence-based intervention recommended in the CDC's Guide to Community Prevention Services, which is defined as programs that increase the length of, or activity levels in, school-based physical education classes. The AHA also recommends that ISBE promote the CDC's CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school.

Additionally, the AHA recommends that needs assessments ask schools if they are eligible for the "Community Eligibility Provision" for school lunch programs, and if they are, if they are taking the option. Including this question about the provision will help schools identify potential food and nutrition benefits for their students that they can leverage to promote health.

Table 3: Summary of Recommendations for Accountability Measure, School Report Card Measures, Needs Assessment, Evidence-Based Practices and Professional Development

| | Recommendations |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Accountability Measures on Physical Education | <ul style="list-style-type: none"> • The number of elementary school students receiving/schools offering 150 minutes of physical education per week, • The number of middle school students receiving/schools offering 225 minutes of physical education per week, and • The percentage of schools requiring physical education for high school graduation. |
| School Report Card | <ul style="list-style-type: none"> • The percentage of students granted waivers, substitutions or exemptions from physical education, • The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program), • The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards, • The percentage of physical education curriculum that are aligned with state standards, and • The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities) |
| Needs Assessment | <p>One of the following:</p> <ul style="list-style-type: none"> • The CDC's <u>School Health Index</u>, specifically the Physical Education and Other Physical Activity Programs module (Module 3). • The <u>Let's Move Active Schools</u> baseline assessment • The <u>Alliance for a Healthier Generation Healthy Schools Program</u> assessment. |
| Evidence-Based Interventions | <ul style="list-style-type: none"> • CDC's CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school • <u>Enhanced Physical Education</u>, includes details on specific evidence-based interventions recommended in the CDC's <i>Guide to Community Prevention Services</i> |

Conclusion

The AHA is grateful for the opportunity to respond to the first draft of the state's plan for implementation of the Every Student Succeeds Act. The AHA applauds Illinois' long-standing commitment to student achievement, health, and development and for taking action to support students. We urge you to continue to advance your work by recognizing the importance of physical health and other related issues. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.



Dr. Lori Wilcox, Superintendent
Ms. Stacey Bachar, Asst. Supt. Business Services/CSBO
Dr. Julie Brua, Asst. Supt. Curriculum, Instruction & Multilingual Education
Dr. Robert Hudson, Asst. Supt. Educational Innovation

December 12, 2016

Illinois State Board of Education
100 North First Street
Springfield, IL 62777-0001

To Whom It May Concern:

Thank you for providing this opportunity to submit feedback on Draft #2 of the Illinois ESSA plan. We have reviewed Draft #2 and commend Melina Wright and all those who have worked diligently to solicit and analyze input from so many stakeholder groups. Our feedback addresses elements of Draft #2 under Section 2: *Challenging State Academic Standards and Academic Assessments*, Section 3: *Accountability, Support and Improvement for Schools* and Section 5: *Supporting All Students* as it relates to serving our entire student body, especially our diverse and rapidly increasing English Learner (EL) population.

Specifically, our response offers the following suggestions to be considered for inclusion in Draft #3 of the IL ESSA plan:

1. We support the suggestion to create a new subgroup entitled "Former ELL" students.
2. We support the proposed change to subgroup size to become an "n" of 20.
3. We recommend the use of Composite Literacy Proficiency scores on ACCESS for ELs.
4. We recommend that the *ACCESS for ELLs* results be used as the reading measure for ELs.
5. We recommend that alternative mathematics measures be constructed in the native languages of all EL students.
6. Should suggestions #5 and/or #6 not be approved, we recommend that the results of ELs PARCC Assessment be used for growth calculation only until the students demonstrate English language proficiency.
7. We support the development of data dashboards (e.g., Ed360) to support robust data analysis.
8. We recommend the performance level descriptor "growing" be changed to "approaching."
9. We support the use of multiple measures to reduce our reliance on a single measure of academic achievement.
10. We support the criteria listed on page 18 of Draft #2 for school success/quality indicators.
11. We recommend weighting the academic indicators at 51% and the school quality/success indicators at 49% provided the school quality/success indicators reflect the depth and breadth of conditions that contribute to the ESSA definition of a "well-rounded education."
12. We recommend that student participation in programs aligned with the new IL Arts Standards be included as a school success/quality indicator.

Community Consolidated School District 102 (D102) is a high-achieving elementary school district serving students and families of Buffalo Grove, IL. Over 68% of D102 families indicated that a language other than English is used in their homes. Furthermore, these households identified over 50 unique languages (other than English) currently being used across our community. While the 2016 School Report Card indicates that 22% of D102 students were identified as EL, our two K-4 elementary schools' EL populations are reported at 32% and 38%. Our middle and junior high schools' EL populations are each reported at 5% on the 2016 School Report Card. Given this evidence of language diversity within D102, we offer the following feedback on Draft #2 as it relates to the identification and measurement of EL proficiency in English and attainment of academic standards:

- We agree with the proposal to create a "Former ELL" subgroup, with an "n" of 20 (as indicated on page 39 of Draft #2) to monitor progress and compare growth of those students who have attained EL proficiency as measured by the

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English Language Proficiency Assessment commonly known as *ACCESS for ELLs*. By the authors' definition, *ACCESS for ELLs* is a "standards-based, criterion-referenced English language proficiency test designed to measure ELs' social and academic proficiency in English. It assesses social and instructional English as well as the language associated with language arts, mathematics, science, and social studies within the school context across the four language domains." We support the inclusion of language promising to "convene stakeholders to consider the most recent WIDA recommendations regarding cut points for both composite and domain specific proficiency" (as stated on page 13 of Draft #2). It is our understanding that WIDA has determined Illinois to be the only state in the WIDA Consortium that measures the Reading and Writing domains independently, while other states continue to use the Composite Literacy Proficiency score (which includes both Reading and Writing domains). We support the anticipated recommendation to use Composite Literacy Proficiency scores in the future.

- We commend the authors for acknowledging the need to provide students with the opportunity to participate in academic assessments that are valid and reliable for assessing all students. Section 3.1 states that the "accountability system is based on the challenging academic standards for ELA and mathematics" and must include (at a minimum) "four distinct indicators of student performance, measured for all students and separately for each subgroup of students, for each school; Academic achievement (K-12), English Language Proficiency (K-12), Student Growth or another valid and reliable statewide academic (K-8), Graduation rate (high school)" (Page 17 of Draft #2). Now in its third year of implementation in Illinois, the PARCC assessment has been developed to measure the aforementioned "challenging academic standards for ELA and mathematics" with the creation of rigorous test items that include interactive elements and student-constructed responses (created and shared in English). While the PARCC Assessment may be a valid and reliable measure for students who are proficient in English, it is neither reliable nor valid for students who have already been identified as ELs (and identified as Limited English Proficient (LEP) in SIS). Section 2.2 of ESSA requires each state to describe how it is complying with the requirements related to assessments in languages other than English. ESSA Draft #1 stated that, "ISBE has identified languages other than English that are present to a significant extent in the participating student population: Ten languages are used in translation of the directions and reporting shells within the PARCC assessment," and further states, "Math on the PARCC assessment is trans-adapted into Spanish. ISBE does not offer any other native language assessments at the current time." We contend that this situation is neither fair nor equitable for students identified as ELs who are required to spend up to 42 hours testing (given extended time accommodations) in a language for which they have yet to attain proficiency.
- Draft #2 included the statement (found on page 16) that, "ISBE has received comments from stakeholders suggesting that content assessments are made available in languages other than English when 30 percent or more of the English Learners speak the same language." We contend that content assessments must, at least, be made available for every language for which a TBE program exists across Illinois. Currently, only Spanish speakers are provided a trans-adaptation of the PARCC assessment for mathematics. If students are not proficient in reading and/or writing English, they cannot fully participate in any assessment that purports to assess content while also requiring English proficiency to understand test instructions, test items and to construct responses in a language they are still learning. Regardless of the percentages of languages represented at the state, district, school or grade levels, neither ISBE nor the vendor (i.e., Pearson for PARCC) will likely be able to develop new or modify the existing PARCC Assessment into a valid and reliable measure of academic achievement for students who are not proficient in English. While some of the major languages may benefit from this suggestion, a large portion of ELs will still have invalid and unreliable achievement data reported as a result.
- In order to remain compliant with the accountability system defined in Section 3.1, while also serving the rights and best interests of students whose English language abilities are not yet developed to a point of proficiency, we offer

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the following suggestions for your consideration;

- Suggestion 1: Provide for every student who is identified as an EL an alternative assessment developed in her/his native language (where a written language exists) and/or through a collection of learning artifacts (organized by standards in a learning portfolio) to demonstrate the requisite skills and knowledge in mathematics only. Reading and writing proficiency are already assessed with a valid and reliable measure – WIDA’s *ACCESS for ELLs*.
- Suggestion 2: Continue to assess all ELs with the required content assessments (i.e., PARCC & SAT) along with their native English-speaking counterparts. However, use the results of the EL student content assessments only for growth calculations (rather than for reporting Academic Achievement) until they demonstrate proficiency on *ACCESS for ELLs* and are included in the “Former ELL” subgroup. This would allow benchmark scores and longitudinal growth patterns to emerge as each EL’s language proficiency develops, without misrepresenting English proficiency as academic achievement. Consider the frustration of being willing to demonstrate knowledge and skills, yet not understanding what is being asked. For example, you (and most kindergarteners) know the answer to the following question; 一週間は何日ありますか? The challenge you face is determining what the question is asking and then writing the correct answer using the same language in which the question was presented.

We offer the following feedback on Draft #2 as it relates to the Meaningful Differentiation of Schools:

- We are hopeful that the measures used to develop a single summative rating will prove fair and consistent across all 4000 schools in Illinois. We are encouraged by ISBE’s pursuit of data dashboards and the ongoing pilot phase of Ed360 to accurately reflect the overlay of any two metrics for all students and by demographic group. The key is to identify the most relevant and useful indicators to uncover successes and illuminate new possibilities for each learner to demonstrate continuous improvement.
- New performance level descriptors (i.e., initial, growing, meeting and exceeding) are welcome improvements to previous descriptors. However, we believe the concept of “growing” should be consistent at every performance level. For this reason we suggest that “growing” be replaced with “approaching” to avoid any confusion.

We offer the following feedback on Draft #2 as it relates to the weights and measures and school quality/success indicators:

- We agree with and support ISBE’s commitment to an accountability system that honors multiple measures (including attainment, growth and EL proficiency at equal weight) and reduces reliance on a single measure of academic achievement in two content areas.
- We recommend weighting the academic indicators at 51% and the school quality/success indicators at 49% provided that the school quality/success indicators reflect the depth and breadth of conditions that contribute to the ESSA definition of a “well-rounded education.” Some of the student success/school quality indicators offered by the Accountability Workgroup hold promise, especially Access to physical activities, Nutrition, Extracurricular activities (participation outside school day), Student-counselor ratio, Student-nurse ratio, Components of 5Essentials Survey, Parent-Student-Teacher Engagement, Community Engagement, and Teachers/administrators engaged beyond classroom. In addition to the aforementioned school quality/success indicators, we agree with using data to support the existence of, and student participation in extracurricular and out-of-school activities, after-school activity, overall school wellness and whole child wellness, work-based learning, socio emotional learning and other school climate

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measures.

- We support the requirement that any school success/quality indicator must meet the following criteria (as defined on page 18):
 - Is valid, reliable, and comparable across all LEAs in the state;
 - Is calculated the same for all schools across the state, except that the measure or measures selected within the indicator of Academic Progress or any indicator of School Quality or Student Success may vary by grade span;
 - Can be disaggregated for each subgroup of students;
 - Includes a different measure than the state uses for any other indicator;
 - Is supported by research finding that performance or progress on such measure is likely to increase student academic achievement or, for measures used within indicators at the high school level, graduation rates; and
 - Aids in the meaningful differentiation among schools by demonstrating varied results across all schools.

- Based on the aforementioned requirements, we recommend that ISBE consider the existence of, and rate of student participation in programs designed to develop proficiency in the new Illinois Fine Arts Standards at all grade levels as part of a well-rounded education. To this end, the existence of programs to engage students in each of the five domains (i.e., Music, Visual Arts, Media Arts, Theatre and Dance) should become school quality/success indicators measured by the existence of programs and student participation in every school across Illinois.

We thank you, again, for this opportunity to provide feedback into the third and final draft of the Illinois ESSA plan. We again commend the team at ISBE for the amount of time and energy expended to provide listening tours, conference presentations and asynchronous methods of participation for all stakeholders to contribute to this very important conversation. If you wish to follow up with us on any of the elements presented in this response, please do not hesitate to contact us at lwilcox@d102.org.

Sincerely,

Aptakistic-Tripp CCSD 102 Board of Education



December 21, 2016

Dear Illinois State Board of Education,

This letter provides Arts Alliance Illinois' feedback on the Every Student Succeeds Act (ESSA) State Plan Draft #2. We appreciate the opportunity to comment on the second draft.

ESSA District Plan

The Alliance commends ISBE for the arts provision – “how the LEA will support efforts to encourage and support the arts” (p. 68) – that the second draft adds to the statutory required components of the ESSA District Plan.

The provision will make district plans more effective by encouraging districts to emphasize a well-rounded education. We appreciate this addition and recognize it as a meaningful step in the evolution of Illinois' ESSA State Plan.

Arts Indicator

In order for the State Plan to achieve its goals, however, it must fully and directly incorporate the arts into the accountability system. Specifically, Illinois' accountability system should *include the arts as a distinct indicator of school quality* at both the elementary and high school level.

Illinois' recently updated arts learning standards attest to the fact that the arts are essential to a complete, competitive education for all students. The arts are a core academic subject in Illinois, part of a well-rounded education under ESSA, and fundamental to school quality. (See “Rationale” below.)

An arts indicator is not only vital, but also practical for Illinois. Arts Alliance Illinois and Ingenuity, along with other partners, have conducted extensive research into how Illinois can operationalize an effective arts indicator, learning from district experience and from other states' success with arts indicators. Based upon this research, we will provide specific indicator options for consideration in the coming weeks.

Rationale and Research

The arts are fundamental to student success and school quality. The arts equip students with critical skills and knowledge; instill key characteristics; increase student, parent, and community engagement; and help close the achievement gap. A plethora of research backs these findings. (See below, as well as our feedback on Draft #1, for a few examples.)

Through the arts, students gain 21st Century Skills such as critical thinking and position themselves for success in college and career.¹ They learn to solve problems creatively, communicate effectively, and work collaboratively.² The arts increase student outcomes across subject areas³ and boost literacy.⁴

Students develop key characteristics through the arts. They gain self-discipline and self-confidence, grow to value different perspectives and cultures, and learn to adapt to changing circumstances. In addition, “in a longitudinal study of 25,000 secondary school students, those with higher involvement in the arts scored better on measures of persistence than their peers with lower arts involvement.”⁵

The arts increase student engagement overall. Arts participation boosts attendance and graduation rates, lowers dropout rates, and decreases disciplinary referrals.⁶ The benefits are schoolwide, reaching students of different abilities and backgrounds.⁷ The arts also engage parents and the community in unique and different ways.⁸

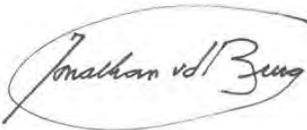
Arts learning has proven particularly effective at helping close the achievement gap. Low-income students with at least nine hours of arts per week are four times more likely to attain high academic achievement.⁹ In a study of AIMS (arts focused) schools, the schools “with the highest percentage of minority and low-income students reduced the reading gap by 14 percent and the math gap by 26 percent over a three year period.”¹⁰

Conclusion

The overwhelming connection between the arts and school quality – a connection proven through extensive research – means that an accountability system devoid of the arts makes little sense. If Illinois’ accountability system under ESSA is to measure school quality accurately, then it must include a distinct arts indicator.

Arts Alliance Illinois appreciates ISBE’s work and leadership, and we look forward to providing you with additional information. Thank you for your consideration, and please do not hesitate to contact us if we can provide additional information.

On behalf of the Alliance,



Jonathan VanderBrug
Policy & Research Director
Arts Alliance Illinois
vanderbrug@artsalliance.org

About Arts Alliance Illinois

With nearly 30,000 advocates and hundreds of member organizations across Illinois, the Alliance is the largest statewide arts and arts education advocacy network in the country. The Alliance ensures that the arts and arts education are central and indispensable to Illinois by empowering stakeholders with the knowledge, skills, and values needed to be active participants in the policymaking process and the civic life of their communities. Visit ArtsAlliance.org and IllinoisArtsLearning.org

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- ⁹ Heath, S. B., Soep, E., & Roach, A. (1998). *Living the arts through language-learning: A report on community-based organizations*. AFTA: Washington, DC. Also see Catterall (2012) above.
- ¹⁰ Real Visions. (2007). *Montgomery County Public Schools, Arts Integration Model Schools Program 2004-2007. Final evaluation report*. Real Visions: Berkeley Springs, WV.



December 16, 2016

To: Illinois State Board of Education

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward. I also would strongly support the Grades 3-8 version of this same format that will be completed soon. I have been involved in the development and would like a K-12 vertical consistency. I strongly encourage adoption of the multi-pathway College and Career Readiness framework for all grade levels.

Additionally, I attended the listening session in Crystal Lake and offered my opinion on a couple of other issues. The Weighting of Indicators needs to be determined and I strongly support the 51% Academic and 49% School Quality Indicators as the target. Finally, I continue to have significant concerns about the subgroups with an "n" size of 20 or any other concrete number. The subgroup indicator should be a % or ratio on school size. I have one school with 3,000 students and one with 275. The "n" should not be the same for both. Please consider a different measure.

If I may be of further assistance, please do not hesitate to call me at (847) 842-3537.

Sincerely,

Dr. Brian Harris
Superintendent of Schools

SUPERINTENDENT
MATTHEW J. KLOSTERMAN

BOARD OF EDUCATION:

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*Belleville
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TO: Illinois State Board of Education

FROM: ^{MJK} Matthew J. Klosterman, Superintendent

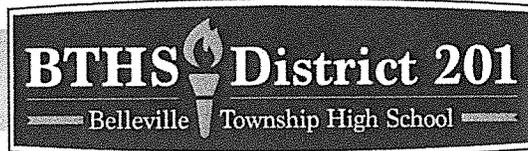
DATE: December 15, 2016

RE: Letter of Support

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

MJK/th



December 20.2016

Please consider the feedback below regarding Draft #2 of the ESSA Plan submitted on behalf of Belleville Township High School District #201.

Comments Regarding ESSA State Draft #2

| | |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Academic Assessments | Consistency of data across school districts is an important priority and allowing multiple options for high school assessment will hinder that goal. Belleville District #201 supports a singular option for high school accountability assessment. |
| Accountability System | There is no option described within the accountability system section of the plan that recognizes the needs of students with significant cognitive disabilities. This is a weakness in the plan that needs addressed. |
| Illinois College and Career Ready Framework | Belleville District #201 supports the College and Career Ready Pathways approach presented at the November Board meeting. We believe the College and Career Readiness Framework included in Draft #1 is too restrictive and does not recognize the needs of our schools and our students. Further, we feel strongly that when ISBE reports the data, it be reported in aggregate and not by individual pathway. Any reporting by individual pathways would create a perception that one pathway is favorable to another. |
| Student Growth | Because of the limited and conflicting research on the validity of student growth models, Belleville District #201 urges ISBE not to include student growth in the accountability framework or to publicly report such data until field testing can be done with the chosen model to ensure that it is a valid and reliable measure of our schools. |
| Subgroup Size | The proposed subgroup size of 20 is too small to yield high quality data and a significant departure from the subgroup size of 45 under NCLB. District #201 supports a subgroup size of 30, which is permitted under ESSA and will allow for more precise data analysis. |
| Weighting of Indicators | For high schools, college and career readiness is listed as one of the School Success Indicators. Attainment is part of both models of college and career readiness included in the plan which means that attainment will be part of both the academic domain and the school quality domain. District #201 supports the 51%/49% weighting, knowing that even the 49% will include attainment, essentially meaning that the academic domain is higher than 51%. |

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| Graduation Rate as an Indicator | Some students with disabilities stay in high school until the day before their 22nd birthday. The high school graduation rate calculation used for accountability purposes must capture those students in such a way as to not penalize schools for providing services they are legally obligated to provide. |
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Sincerely,



Dr. Jeff Dosier
Superintendent

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Send via email to essa@isbe.net

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Carbondale Middle School for the past 8 years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois' focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

We would like to share with you the impactful results PBIS in our school. Since beginning implementation in 2004, we have seen:

- Improved morale, team "spirit" and ownership of behavioral expectations
- Increased consistent teaching and reinforcement of behavior expectations across all school settings.
- Decreases in office discipline referrals and tardies
- Streamlined a universal Classroom Management plan to ensure consistent behavior throughout the entire building and classrooms
- Increase in students and staff member's sense of safety, as expectations are uniformly reinforced
- It reinforces recommended intervention practices as outlined in SB 100

Our School/PBIS Team also benefits from the variety of technical supports from the Midwest PBIS Network, including:

- Training on developing systems and utilizing data within a multi-tiered system (Tier 1, Tier 2, etc.)
- Training on evidence based practices such as, Check-In/Check-Out, Functional Behavior Assessment and Behavior Intervention Plans, Wraparound, and RENEW
- Receiving technical assistance and opportunity to network with other schools through Coaches Networking Meetings
- Access and support to fidelity measures through the PBIS Assessments

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator

- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
- Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (Wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

Marilynn L. Ross, Principal
Carbondale Middle School
1150 E. Grand Ave.
Carbondale, Illinois 62901
618-457-2174



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Scott B. Thompson, EdD
Superintendent of Schools

(847) 963-3000 • Fax (847) 963-3200
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December 5, 2016



Dear Chairman Meeks and ISBE Board Members:

I was in attendance at your November Board Meeting and observed the multi-pathway approach to College and Career Readiness presented by Drs. Schuler and O'Mara. I found it to be a common sense approach supported by research. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach.

This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

As a practitioner, I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Sincerely,

Scott B. Thompson

Scott B. Thompson, Ed.D.
Superintendent of Schools



ESSA Listening Tour 3
Center for the Study of Education Policy
12/22/2016

The **Center for the Study of Education Policy (CSEP)** brings the results of research into the everyday world of educators, governmental leaders, and policymakers. Established in 1960, CSEP conducts applied research and performs public service related to current and emerging policy issues affecting early childhood, K-12, and higher education. Important to the mission of CSEP is the intersection of research and practice as represented by publications and service to education institutions, professional organizations, districts, and government. In 2012, CSEP merged with the National Board Resource Center, enhancing the Center's focus on teaching and learning. In an effort to support the ISBE Every Student Succeeds Act (ESSA) stakeholder engagement efforts, CSEP staff have compiled feedback and suggestions regarding targeted questions in **ISBE Draft #2 ESSA plan**. Our recommendations to ISBE are included below.

Feedback

Recommendation One: Integrate equity standards into state's existing leadership standards that guide professional development and evaluation (and preparation, if feasible).

It is clear throughout the state's ESSA draft plan that equity is a key priority and focus with strategies throughout such as addressing the "whole child" as well as the prioritization of engaging families and communities. In an effort to create a continuum of leadership supports in the state that develop the knowledge, skills, and behaviors in which to accomplish this, we recommend that the state adopt the new Professional Standards for Educational Leaders (PSEL) (<http://www.ccsso.org/Documents/2015/ProfessionalStandardsforEducationalLeaders2015forNPBEAFINAL.pdf>), in which **equity** (Standard 3) and **meaningful engagement of families and communities** (Standard 8) are addressed. The PSEL standards also go into more depth in areas such as **professional capacity of school personnel** (Standard 6) and **professional community for teachers and staff** (Standard 7), which align with ISBE's priorities to encourage school principals and assistant principals to engage and collaborate with teacher leaders in efforts to build distributed leadership models that include shared decision-making processes.

Appendix A is a crosswalk that was developed by CSEP to show the alignment of how current school leadership standards in Illinois align with PSEL. You can see from the crosswalk that current principal preparation and development programs are adequately addressing the new PSEL, with the exception of the four areas mentioned above. At the very least, adopting the new PSEL to align with a revised professional development structure for school leadership will help to create a statewide model for embedded professional development that addresses key priorities in the state's ESSA plan around equity, family and community engagement, and distributed leadership.

Recommendation Two: Leverage partnership models in the state to scale innovative strategies to prevent shortages of leaders in high need areas of the state.

The Center recommends that ISBE leverage existing partnership models developed through state policy: the district/university partnerships required of all principal preparation programs, and the Regional Offices of Education that have the ability to spur innovation through dissemination, promotion, and support for implementing evidence-based best-practices.

District/University Partnerships: An example of innovation spurred by the partnership requirement of the principal preparation changes includes the IL-PART Project. In 2013, a USDE School Leadership Program grant was awarded to the Center for the Study of Education Policy. The project, called the Illinois Partnerships Advance Rigorous Training (IL-PART), represents a collaborative effort between high need districts and universities that have forged formal partnerships aimed at transforming leadership preparation and development. IL-PART is comprised of 3 district/university partnerships:

1. Aurora (East) District 131/North Central College;
2. Bloomington District 87/Illinois State University; and
3. Quincy District 172/Western Illinois University.

The grant also partners with the Greeley Center for Catholic Education at Loyola University and dioceses representing Catholic Schools in Aurora, Bloomington, and Quincy.

The consortium of partners collaborate in a three-fold effort aimed at: 1) enhancing the role of the district/university partnerships in creating rigorous and relevant principal training programs aligned to the complexities faced by today's principals; 2) developing a pipeline of highly trained principal candidates well prepared to take on the challenges of high-need schools; and 3) working collectively to build district and school leadership capacity aimed at improving teaching and learning, and supporting high academic standards for students in participating high-need districts.

Through this grant, these universities/districts have piloted an intensive yearlong internship model that includes a component that allows the candidate to complete a full semester of full-time, job embedded leadership experiences in a high-need school. The full-time, full-semester internship component provides intensive, job embedded experiences for principal candidates similar to exemplary models, such as New Leaders and UIC's Urban Education Leadership program¹, but at the cost of a substitute teacher for the semester (averaging \$25,000 per candidate) versus the full-year paid salary of UIC and NL's model.

At the end of Project Year 3 of 5, the IL-PART project has outperformed its initial targets. At inception, a principal preparation candidate enrollment target was set at **80 candidates** for the life of the grant. By the end of PY3, IL-PART partner programs have enrolled a total of 162 candidates. These enrollments will grow as there are still two more years left of the grant. Further, the project partners have embraced the initial goal to ensure sustainability of the partnerships at the end of the grant.

In addition to exceeding enrollment projections, IL-PART has begun to demonstrate positive outcomes in both hiring of IL-PART-trained candidates, and positive performance by IL-PART-developed and supported school leaders. At the end of Project Year 3 of 5, 37 IL-PART-trained candidates have completed partnering principal preparation programs, of which 13 candidates have been hired as principals or assistant principals. Of those 13 hired as principals or assistant principals, 46% were hired in high-need districts. Of the remaining 24 graduates, many are serving in other leadership positions (School

¹ New Leaders and UIC, in collaboration with the Chicago Public Schools fund the salary of principal candidates that complete full-time/full year internships. Their evidence model, while proven effective, has been determined to be cost prohibitive for most districts in Illinois. Therefore, the IL-PART project set out to determine whether or not a more cost effective and replicable strategy that funds the full-time experience for one semester would yield similar positive results. The American Institutes for Research is currently conducting a study to determine the extent of differences between traditional and intensive internships experiences in IL-PART partner programs.

Administrative Manager (SAM), dean of students, curriculum director, instructional coach, teacher leader, etc.).

School principals and assistant principals in partner districts (East Aurora, Quincy, and Bloomington) have also exceeded expectations, both in terms of participation in grant provided professional development and in performance outcomes, including:

- 101 Principals & APs participating in ongoing IL-PART professional development (202% of target)
- 42 IL-PART principals were trained and selected as mentor principals qualified to host principal interns (167% of target)
- 100% of participating Principals & APs demonstrated positive student growth (125% of target)
- 100% of participating Principals & APs were rated highly effective or effective (125% of target)
- 86% of participating Principals & APs remained in high need districts through PY5 (108% of target)

We are sharing information about the IL-PART grant with you to give an example of the power of partnerships as a viable strategy to strengthen principal preparation, professional development, and regional capacity building. We have learned from this grant that to do this work does not necessarily take a lot of new funding, but rather the commitment of time and resources to bring partners together in a mutually beneficial way.

This year, a key strategy of IL-PART will be to scale the Intensive/full-time internships to other districts that are interested in replicating this practice but using their own funding to do so. At a cost of roughly \$25,000 per internship, this is an affordable strategy for districts who are interest in tying the principal internships placement to the district's principal vacancy strategy. Lessons learned from IL-PART partners have been documented with regards to:

- Identification and placement of high quality substitute teachers in order to mitigate negative impact on student learning by having a substitute teacher for a full semester;
- Strategies to minimize the impact of the Affordable Care Act on substitute teacher costs;
- How to manage the requirements of the IL Performance Evaluation Reform Act for teachers released from teaching responsibilities to complete the full-time/full semester principal internship component;
- Utilizing the university/district partnership for principal preparation to increase the pipeline of highly trained school leaders, and to inform and improve the district's leadership succession planning process; and
- Tools have been developed to message the new internship model, determine the substitute costs for districts, and agreements that promote retaining candidates in the district after and investment in their development has been made.

After consulting with the IL-PART directors, the Decatur School District is currently replicating the intensive principal internship model in partnership with Eastern Illinois University. IL-PART is also working with a few Regional Offices of Education and the Large Unit District Association (LUDA) to develop the capacity to support this work within their own member districts. To learn more about the IL-PART grant and see resources that have been developed and available as open source documents for other districts and universities, please go to the following web site: www.ilpart.org

[Expanded Role for Regional Offices of Education:](#)

ROE's are strategically positioned to support the recruitment, hiring, development, and retention of highly effective teachers and leaders in hard to staff districts and schools. This is particularly true for districts in rural areas, as is not uncommon for the ROE to be one of the only professional development providers in rural and/or isolated areas. ROEs can also provide access between districts to settings and approaches

that have demonstrated effectiveness with similar populations and within a similar context. Therefore, ROEs can and should play an expanded role in:

1. Partnering with universities and professional associations to bring necessary preparation programs and development services to underserved areas;
2. Providing access to small districts that may not have the capacity to partner with universities in the identification, recruitment, or placement of high potential candidates that could address specific shortages in the area;
3. Coordinating placement of pre-service candidates to ensure they are provided with experience in various settings and with a variety of students;
4. Maximizing professional learning funds by coordinating opportunities across multiple districts based on regional and local needs; and
5. Ensuring a regional approach to talent development that increases the pipeline of highly trained teachers and leaders for small districts so that they do not discourage their best employees from seeking additional certification training for fear they will leave the district.

Examples of these types of efforts can be found in ROE #1 (Adams, Brown, Cass, Morgan, Pike & Scott County) and ROE #19 (DuPage County). These districts have adopted a regional approach to providing a continuum of support that coordinates professional learning efforts from pre- through in-service phases.

ROE #1 is currently exploring methods and processes to scale best practices identified through the IL-PART project in Quincy with other districts and universities preparing educators in the region. ROE#1 is interested in ensuring equity of access and distribution of resources involving educator preparation and development to all districts in the region, with particular attention to underserved rural areas. Quincy Public School #172, a formal partner in the IL-PART project, is working with districts locally and around the state in developing high quality mentor principals and university faculty supervisors that oversee educators during their per-service programs.

Additionally, the DuPage ROE has been collaborating with UIC and ISU in the creation of a year-long professional development series designed to engage school leadership and teacher teams in completing cycles of inquiry focused on problems of practice and instructional improvements. ROE #19 also provides technical assistance to IL-PART partner universities and districts on improvements to each district's talent development and succession planning processes.

Crosswalk of Adopted 2015 PSEL Standards, 2008 ISLLC Standards, Illinois Performance Standards for School Leaders and the Statewide Principal Evaluation Model Indicators, and Principal Preparation Internship State Required Three Assessments

| PSEL Standards 2015 (and indicators): | Standards for IL Principal Preparation Programs | | | | Illinois Performance Standards for School Leaders | Default Principal Evaluation Indicators: |
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| | ISLLC Standards 2008 (and indicators) | 13 SREB Critical Success Factors (and 36 indicators) | Principal Prep Internship Three Assessments (required) | LINC Assessments (early childhood, ELL, and special education) (voluntary assessments used by many programs) | | |
| <p>Standard 1. Mission, Vision, and Core Values Effective educational leaders develop, advocate, and enact a shared mission, vision, and core values of high-quality education and academic success and well-being of each student. Effective leaders:</p> <p>a) Develop an educational mission for the school to promote the academic success and well-being of each student.</p> <p>b) In collaboration with members of the school and the community and using relevant data, develop and promote a vision for the school on the successful learning and development of each child and on instructional and organizational practices that promote such success.</p> <p>c) Articulate, advocate, and cultivate core values that define the school's culture and stress the imperative of child-centered education; high expectations and student support; equity, inclusiveness, and social justice; openness, caring, and trust; and continuous improvement.</p> | <p>ISLLC 1. Develops, articulates, implements, and stewards a vision of learning, shared and supported by all stakeholders</p> <p>--Collaboratively develop and implement a shared vision --Collect and use data to identify goals, assess organizational effectiveness, and promote organizational learning --Create and implement plans to achieve goals --Promote continuous and sustainable improvement --Monitor and evaluate progress and revise plans</p> | <p>CSF 1. Creates a focused mission and vision to improve student achievement</p> <p>1a. working with teachers to implement curriculum that produces gains in student achievement as defined by the mission of the school.</p> <p>1b. working with the administration to develop, define and/or adapt best practices based on current research that supports the school's vision.</p> <p>1c. working with the faculty to develop, define, and/or adapt best practices, based on current research, that support the school's vision.</p> <p>1d. assisting with transitional activities for students as they progress to higher levels of placement (e.g., elementary to middle, middle to high school, high school to</p> | <p>Assessment # 1 – Demonstrate a comprehensive understanding and performance in data analysis, school improvement, and conducting the SIP process (to the extent possible).</p> <p>Focus Area: 1.1 – Explain the purpose of the SIP and its relationship to the school's vision in a presentation to a group of stakeholders (e.g., at a faculty meeting, department meeting, parent group, community group, etc).</p> | <p>IPSSL 1. Living a Mission and Vision Focused on Results: The principal works with the staff and community to build a shared mission, and vision of high expectations that ensures all students are on the path to college and career readiness, and holds staff accountable for results</p> <p>a. Coordinates efforts to create and implement a vision for the school and defines desired results and goals that align with the overall school vision and lead to student improvement for all learners</p> <p>b. Ensures that the school's identity, vision, and mission drive school decisions</p> <p>c. Conducts difficult but crucial conversations with individuals, teams, and staff based on student performance data in a timely manner for the purpose of enhancing student learning and results</p> | <p>a. Collaborates to Develop and Maintain a Shared Vision of High Expectations</p> <p>b. Ensures vision and mission drive school decisions & Confronts Low Expectations</p> <p>c. Conducts difficult Conversations to Improve Student Results</p> | |

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| <p>d) Strategically develop, implement, and evaluate actions to achieve the vision for the school.</p> <p>e) Review the school’s mission and vision and adjust them to changing expectations and opportunities for the school, and changing needs and situations of students.</p> <p>f) Develop shared understanding of and commitment to mission, vision, and core values within the school and the community.</p> <p>g) Model and pursue the school’s mission, vision, and core values in all aspects of leadership.</p> <p>Standard 10 – School Improvement Effective educational leaders act as agents of continuous improvement to promote each student’s academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Seek to make school more effective for each student, teachers and staff, families, and the community.</p> <p>b) Use methods of continuous improvement to achieve the vision, fulfill the mission, and promote the core values of the school.</p> <p>c) Prepare the school and the community for improvement, promoting readiness, an imperative for improvement, instilling mutual commitment and</p> | | <p>higher education).</p> <p>CSF 8. Understands the change process and has the leadership and facilitation skills to manage change effectively</p> <p>8a. working with faculty and staff in professional development activities.</p> <p>8b. inducting and/or mentoring new teaching staff.</p> <p>8c. building a “learning community” that includes all stakeholders.</p> | | | | |
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| <p>accountability, and developing the knowledge, skills, and motivation to succeed in improvement.</p> <p>d) Engage others in an ongoing process of evidence-based inquiry, learning, strategic goal setting, planning, implementation, and evaluation for continuous school and classroom improvement.</p> <p>e) Employ situationally-appropriate strategies for improvement, including transformational and incremental, adaptive approaches and attention to different phases of implementation.</p> <p>f) Assess and develop the capacity of staff to assess the value and applicability of emerging educational trends and the findings of research for the school and its improvement.</p> <p>g) Develop technically appropriate systems of data collection, management, analysis, and use, connecting as needed to the district office and external partners for support in planning, implementation, monitoring, feedback, and evaluation.</p> <p>h) Adopt a systems perspective and promote coherence among improvement efforts and all aspects of school organization, programs, and services.</p> <p>i) Manage uncertainty, risk, competing initiatives, and politics of change with courage and perseverance,</p> | | | | | | |
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| <p>providing support and encouragement, and openly communicating the need for, process for, and outcomes of improvement efforts.</p> <p>j) Develop and promote leadership among teachers and staff for inquiry, experimentation and innovation, and initiating and implementing improvement.</p> | | | | | |
| <p>Standard 3. Equity and Cultural Responsiveness. Effective educational leaders strive for equity of educational opportunity and culturally responsive practices to promote each student’s academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Ensure that each student is treated fairly, respectfully, and with an understanding of each student’s culture and context.</p> <p>b) Recognize, respect, and employ each student’s strengths, diversity, and culture as assets for teaching and learning.</p> <p>c) Ensure that each student has equitable access to effective teachers, learning opportunities, academic and social support, and other resources necessary for success.</p> <p>d) Develop student policies and address student misconduct in a positive, fair, and unbiased manner.</p> <p>e) Confront and alter institutional biases of student marginalization,</p> | <p>ISLLC 2. Advocates, nurtures, and sustains a school culture and instructional program conducive to student learning and staff professional growth</p> <p>--Nurture and sustain a culture of collaboration, trust, learning, and high expectations</p> <p>--Create a comprehensive, rigorous and coherent curricular program</p> <p>--Create a personalized and motivating learning environment for students</p> <p>--Supervise instruction</p> <p>--Develop assessment and accountability systems to monitor student progress</p> <p>--Develop the instructional and leadership capacity of staff</p> <p>--Maximize time spent on quality instruction</p> <p>--Promote the use of the most effective and</p> | <p>CSF 2. Sets high expectations for all students to learn higher-level content</p> <p>2a. developing/overseeing academic recognition programs that acknowledge and celebrate student’s success at all levels of ability.</p> <p>2b. activities resulting in raising standards and academic achievement for all students and teachers.</p> <p>2c. authentic assessments of student work through the use and/or evaluation of rubrics, end of course tests, projects.</p> <p>CSF. 3. Recognizes and encourages implementation of good instructional practices that motivate and increase student achievement</p> | <p>Assessment # 1 – Demonstrate a comprehensive understanding and performance in data analysis, school improvement, and conducting the SIP process (to the extent possible).</p> <p>Focus Area: 1.2 – Analyze and review data, including but not limited to, state test results, and work with a faculty group/team to identify areas for improvement and interventions, with particular attention given to NCLB subgroups and low performing students.</p> <p>Focus Area: 1.3 – Work with faculty or faculty teams to create, implement, and formatively evaluate a school improvement action plan.</p> <p>Focus Area: 1.4 – Work with faculty or faculty teams to gather and examine data to assess progress on the SIP and made recommendations for improvements or modifications to the SIP for</p> | <p>a. Use student data to work collaboratively with teachers to modify curriculum and instructional strategies to meet the needs of each student, including ELLs and students with disabilities, and to incorporate the data into the School Improvement Plan</p> <p>f. Analyze and use student information to design instruction that meets the diverse needs of students and leads to</p> | <p>IPSSL 3 – Improving Teaching and Learning – The principal works with the school staff and community to develop a research-based framework for effective teaching and learning that is refined continuously to improve instruction for all students.</p> <p>a. Works with and engages staff in the development and continuous refinement of a shared vision for effective teaching and learning by implementing a standards based curriculum, relevant to student needs and interests, research-based effective practice, academic rigor, and high expectations for student performance in every classroom.</p> <p>b. Creates a continuous improvement cycle that uses multiple forms of data and student work samples to support individual, team, and school-wide improvement goals, identify and address areas of improvement and celebrate successes</p> <p>a. Implements Curricular Scope and Sequence & Reviews Instructional Practices</p> <p>b. Implements Data Driven Decision Making</p> <p>c. Uses Disaggregated Data</p> <p>d. Selects and Assigns Effective Teachers & Retains Effective Teachers</p> <p>e. Observes Staff and Gives Feedback; Evaluates Staff</p> <p>f. Develops an Instructional Team</p> |

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| <p>deficit-based schooling, and low expectations associated with race, class, culture and language, gender and sexual orientation, and disability or special status.</p> <p>f) Promote the preparation of students to live productively in and contribute to the diverse cultural contexts of a global society.</p> <p>g) Act with cultural competence and responsiveness in their interactions, decision making, and practice.</p> <p>h) Address matters of equity and cultural responsiveness in all aspects of leadership.</p> <p>Standard 4 – Curriculum, Instruction, and Assessment Effective educational leaders develop and support intellectually rigorous and coherent systems of curriculum, instruction, and assessment to promote each student’s academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Implement coherent systems of curriculum, instruction, and assessment that promote the mission, vision, and core values of the school, embody high expectations for student learning, align with academic standards, and are culturally responsive.</p> <p>b) Align and focus systems of curriculum, instruction, and assessment within and across grade levels to promote student academic</p> | <p>appropriate technologies to support teaching and learning</p> <p>--Monitor and evaluate the impact of the instructional program.</p> | <p>3a. using a variety of strategies to analyze and evaluate the quality of instructional practices being implemented in a school.</p> <p>3b. working with teachers to select and implement appropriate instructional strategies that address identified achievement gaps.</p> <p>3c. working on a school team to prioritize standards and map curriculum in at least one content area across all grade levels of the school.</p> <p>3d. working with a group of teachers to unwrap adopted standards and develop assignments and assessments aligned with the standards.</p> <p>3e. working with a school team to monitor implementation of an adopted curriculum.</p> <p>3f. involvement in the work of literacy and numeracy task forces.</p> <p>3g. working with curriculum that is interdisciplinary and provides opportunities for students to apply knowledge in various modalities across the curriculum.</p> <p>CSF 4. Creates a</p> | <p>the following year.</p> <p>Assessment #2 Demonstrate comprehensive understanding and performance in conducting teacher hiring, evaluation, and professional development</p> <p>Focus Area: 2.2 Conduct a full cycle of clinical supervision, including a pre-conference, conference, and post-conference. Write a summary utilizing actual notes, observations, discussion, forms, and student achievement data providing feedback to the teacher. Provide examples of interventions and support needed for the non-tenured or struggling teacher.</p> <p>Focus Area: 2.3 In conjunction with stakeholders lead in the development of a professional development plan for a school building that included: (1) data analysis (reviewed in Focus Area 1.2); (2) multiple options for teacher development; and (3) a method for evaluating the plan leading to school improvement.</p> <p>Focus Area: 3.1 – Investigate, define, and delineate the systems and factors within the internship school for advocating, nurturing, and sustaining a culture of collaboration, trust, learning, and high expectations and a personalized and motivating</p> | <p>ongoing growth and development of all students.</p> <p>g. Recognize the individual needs of students and work with special education and bilingual education teachers to develop school support systems so that teachers can differentiate strategies, materials, pace, levels of complexity, and language to introduce concepts and principles so that they are meaningful to students at varying levels of development and to students with diverse learning needs.</p> | <p>c. Implements student interventions that differentiate instruction based on student needs</p> <p>d. Selects and retains teachers with the expertise to deliver instruction that maximizes student learning</p> <p>e. Evaluates the effectiveness of teaching and holds individual teachers accountable for meeting their goals by conducting frequent formal and informal observations in order to provide timely, written feedback on instruction, preparation and classroom environment as part of the district teacher appraisal system.</p> <p>f. Ensures the training, development, and support for high-performing instructional teacher teams to support adult learning and development to advance student learning and performance</p> <p>g. Supports the system for providing data-driven professional development and sharing of effective practice by thoughtfully providing and protecting staff time intentionally allocated for this purpose</p> <p>h. Advances Instructional Technology within the learning environment</p> <p>IPSSL 6 CREATING AND SUSTAINING A CULTURE OF HIGH</p> | <p>g. Implements Professional Learning</p> <p>h. Promotes Growth of Technology</p> <p>a. Links Aspirations to College and Career Opportunities & Develops a Student Goal Setting Process</p> <p>b. Translates the School Values into Specific Behaviors & Develops a Code of Conduct</p> <p>c. Creates a Culture That Supports Social Emotional Learning & Effective Effort</p> |
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| <p>success, love of learning, the identities and habits of learners, and healthy sense of self.</p> <p>c) Promote instructional practice that is consistent with knowledge of child learning and development, effective pedagogy, and the needs of each student.</p> <p>d) Ensure instructional practice that is intellectually challenging, authentic to student experiences, recognizes student strengths, and is differentiated and personalized.</p> <p>e) Promote the effective use of technology in the service of teaching and learning.</p> <p>f) Employ valid assessments that are consistent with knowledge of child learning and development and technical standards of measurement.</p> <p>g) Use assessment data appropriately and within technical limitations to monitor student progress and improve instruction.</p> | | <p>school where faculty and staff understand that every student counts—</p> <p>4a. working with staff to identify needs of all students.</p> <p>4b. collaborating with adults from within the school and community to provide mentors for all students.</p> <p>4c. engaging in activities designed to increase parental involvement.</p> <p>4d. engaging in parent/student/school collaborations that develop long-term educational plans for students.</p> <p>CSF 5. Uses data to initiate and continue improvement in school and classroom practices</p> <p>5a. analyzing data (including standardized test scores, teacher assessments, psychological data, etc.) to develop/refine instructional activities and set instructional goals.</p> <p>5b. facilitating data disaggregation for use by faculty and other stakeholders.</p> <p>CSF 9. Understands concepts of adult learning and provide sustained professional development that benefits students</p> <p>9a. study groups,</p> | <p>learning environment for students.</p> <p>Focus Area: 3.3 – State the mission of the school. Determine and analyze the different systems that exist within the school to fulfill the school’s mission (i.e. instructional: curriculum, assessment, technology, class structure; and management: discipline plan; attendance; maintenance; transportation, etc.). Choose one instructional and one management system; create an assessment tool that was used to rate the two systems. Finally, develop recommendations for improvement of aspects of the two systems that need improvement and report the findings to the internship principal.</p> | | <p>EXPECTATIONS—The principal works with staff and community to build a culture of high expectations and aspirations for every student by setting clear staff and student expectations for positive learning behaviors and by focusing on students’ social-emotional learning</p> <p>a. Builds a culture of high aspirations and achievement for every student</p> <p>b. Requires staff and students to demonstrate consistent values and positive behaviors aligned to the school’s vision and mission</p> <p>c. Leads a school culture and environment that successfully develops the full range of students’ learning capacities- academic, creative, social-emotional, behavioral and physical.</p> | |
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| | | <p>problem-solving sessions and/or ongoing meetings to promote student achievement.</p> <p>9b. scheduling, developing and/or presenting professional development activities to faculty that positively impact student achievement.</p> <p>CSF 13. Is a life-long learner continuously learning and seeking out colleagues to keep abreast of new research and proven practices</p> <p>13a. working with faculty to implement research-based instructional practices.</p> <p>13b. working with professional groups and organizations.</p> | | | | |
| <p>Standard 9 – Operations and Management</p> <p>Effective educational leaders manage school operations and resources to promote each student’s academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Institute, manage, and monitor operations and administrative systems that promote the mission and vision of the school.</p> <p>b) Strategically manage staff resources, assigning and scheduling teachers and staff to roles and responsibilities that optimize their professional capacity to address each student’s learning needs.</p> | <p>ISLLC 3. Manages the school, its operations and resources for a safe, efficient, and effective learning environment</p> <p>--Monitor and evaluate the management and operational systems</p> <p>--Obtain, allocate, align, and efficiently utilize human, fiscal, and technological resources</p> <p>--Promote and protect the welfare and safety of students and staff</p> <p>--Develop the capacity for distributed leadership</p> | <p>CSF 10. Uses and organizes time in innovative ways to meet the goals of school improvement</p> <p>10a. scheduling of classroom and/or professional development activities in a way that provides meaningful time for school improvement activities.</p> <p>10b. scheduling time to provide struggling students with the opportunity for extra support (e.g., individual tutoring, small-group instruction, extended-block time) so that they</p> | <p>Assessment #2</p> <p>Demonstrate comprehensive understanding and performance in conducting teacher hiring, evaluation, and professional development.</p> <p>Focus Area: 2.1 Participate in the hiring process including, at a minimum: creation of a job description; creation of interview questions and assessment rubric; participation in interviews for the position; recommendation of the candidate to hire with rationale and data to support the selection; and preparation of letters of rejection for candidates who</p> | | <p>IPSSL. 2. Leading and Managing Systems Change: The principal creates and implements systems to ensure a safe, orderly, and productive environment for student and adult learning toward the achievement of school and district improvement priorities</p> <p>a. Develops, implements, and monitors the outcomes of the school improvement plan and school wide student achievement data results to improve student achievement</p> <p>b. Creates a safe, clean and orderly learning</p> | <p>a. Assesses the Current State of School Performance & Develops a School Improvement Plan & Maintains a Focus on Result</p> <p>b. Builds, evaluates and develops a team of educators and support staff to ensure the learning environment is safe, clean, and orderly</p> |

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| <p>c) Seek, acquire, and manage fiscal, physical, and other resources to support curriculum, instruction, and assessment; student learning community; professional capacity and community; and family and community engagement.</p> <p>d) Are responsible, ethical, and accountable stewards of the school’s monetary and non-monetary resources, engaging in effective budgeting and accounting practices.</p> <p>e) Protect teachers’ and other staff members’ work and learning from disruption.</p> <p>f) Employ technology to improve the quality and efficiency of operations and management.</p> <p>g) Develop and maintain data and communication systems to deliver actionable information for classroom and school improvement.</p> <p>h) Know, comply with, and help the school community understand local, state, and federal laws, rights, policies, and regulations so as to promote student success.</p> <p>i) Develop and manage relationships with feeder and connecting schools for enrollment management and curricular and instructional articulation.</p> <p>j) Develop and manage productive relationships with the central office and school board.</p> <p>k) Develop and administer systems for fair and</p> | <p>--Ensure teacher and organizational time is focused to support quality instruction and student learning</p> | <p>may have the opportunity to learn to mastery.</p> <p>CSF 11 Acquires and use resources wisely</p> <p>11a. writing grants or developing partnerships that provide needed resources for school improvement.</p> <p>11b. developing schedules that maximize student learning in meaningful ways with measurable success.</p> | <p>were not selected.</p> <p>2.2 Conduct a full cycle of clinical supervision, including a pre-conference, conference, and post-conference. Write a summary utilizing actual notes, observations, discussion, forms, and student achievement data providing feedback to the teacher. Provide examples of interventions and support needed for the non-tenured or struggling teacher.</p> <p>Focus Area: 3.2 – Review the school’s budget and other school resources with the internship principal. Detail how the resources are typically used; how the resources could be evaluated for adequacy; assessed for effectiveness and efficiency; and gave recommendations for improvement. Address specifically the impact of the budget on subgroups such as special education, ELL, and low socio-economic students. Present recommendations for improvement to a faculty or faculty group for input in the budget development process.</p> | <p>e. Proactively serve all students and their families with equity and honor and advocate on their behalf, ensuring an opportunity to learn and the well-being of each child in the classroom.</p> | <p>environment</p> <p>c. Collaborates with staff to allocate personnel, time, material, and adult learning resources appropriately to achieve the school improvement plan targets</p> <p>d. Employs current technologies</p> | <p>c. Allocates Resources to Support Student Learning</p> |
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| <p>equitable management of conflict among students, faculty and staff, leaders, families, and community.</p> <p>l) Manage governance processes and internal and external politics toward achieving the school's mission and vision.</p> <p>Standard 6 – Professional Capacity of School Personnel</p> <p>Effective educational leaders develop the professional capacity and practice of school personnel to promote each student's academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Recruit, hire, support, develop, and retain effective and caring teachers and other professional staff and form them into educationally effective faculty.</p> <p>b) Plan for and manage staff turnover and succession, providing opportunities for effective induction and mentoring of new personnel.</p> <p>c) Develop teachers' and staff members' professional knowledge, skills, and practice through differentiated opportunities for learning and growth, guided by understanding of professional and adult learning and development.</p> <p>d) Foster continuous improvement of individual and collective instructional capacity to achieve outcomes envisioned for each student.</p> | | | | | | |
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| <p>e) Deliver actionable feedback about instruction and other professional practice through valid, research-anchored systems of supervision and evaluation to support the development of teachers' and staff members' knowledge, skills, and practice.</p> <p>f) Empower and motivate teachers and staff to the highest levels of professional practice and to continuous learning and improvement.</p> <p>g) Develop the capacity, opportunities, and support for teacher leadership and leadership from other members of the school community.</p> <p>h) Promote the personal and professional health, well-being, and work-life balance of faculty and staff.</p> <p>i) Tend to their own learning and effectiveness through reflection, study, and improvement, maintaining a healthy work-life balance.</p> | | | | | | |
| <p>Standard 5 – Community of Care and Support for Students Effective educational leaders cultivate an inclusive, caring, and supportive school community that promotes the academic success and well-being of each student.</p> <p>Effective leaders: a) Build and maintain a safe, caring, and healthy school environment that meets that the academic, social,</p> | <p>ISLLC 4. Collaborates with faculty and community members, responds to diverse community interests and needs, and mobilizes community resources</p> <p>--Collect and analyze data and information pertinent to the educational environment</p> <p>--Promote understanding, appreciation, and use of the community's diverse,</p> | <p>CSF 6. Effectively communicates to keep everyone informed and focused on student achievement</p> <p>6a. analyzing and communicating school progress and school achievement to teachers, parents and staff.</p> <p>6b. gathering feedback regarding the effectiveness of personal</p> | <p>Assessment # 3 – Demonstrate comprehensive understanding and performance in conducting school-wide management of personnel, resources, and systems for adequacy and equity.</p> <p>Focus Area: 3.1 – Investigate, define, and delineate the systems and factors within the internship school for advocating, nurturing, and sustaining a culture of collaboration,</p> | <p>h. Evaluate a school to ensure the use of a wide range of printed, visual, or auditory materials and online resources appropriate to the content areas and the</p> | <p>IPSSL. 4. Building and Maintaining Collaborative Relationships: The principal creates a collaborative school community where the school staff, families, and community interact regularly and share ownership for the success of the school</p> <p>a. Creates, develops and sustains relationships that result in active</p> | <p>a. Builds On-going Relationships</p> <p>b. Includes Multiple</p> |

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| <p>emotional, and physical needs of each student. b) Create and sustain a school environment in which each student is known, accepted and valued, trusted and respected, cared for, and encouraged to be an active and responsible member of the school community. c) Provide coherent systems of academic and social supports, services, extracurricular activities, and accommodations to meet the range of learning needs of each student. d) Promote adult-student, student-peer, and school-community relationships that value and support academic learning and positive social and emotional development. e) Cultivate and reinforce student engagement in school and positive student conduct. f) Infuse the school's learning environment with the cultures and languages of the school's community.</p> <p>Standard 7 – Professional Community for Teachers and Staff Effective educational leaders foster a professional community of teachers and other professional staff to promote each student's academic success and well-being. Effective leaders: a) Develop workplace conditions for teachers and other professional staff that promote effective</p> | <p>cultural, social, and intellectual resources</p> <p>--Build and sustain positive relationships with families and caregivers</p> <p>--Build and sustain productive relationships with community partners</p> | <p>communication skills. CSF 12. Obtains support from central office, community and parent leaders to champion the school improvement agenda 12a. working with faculty to communicate with school board and community stakeholders in a way that supports school improvement. 12b. working with faculty, parents and community to build collaboration and support for the school's agenda.</p> <p>CSF 7. Partners with parents to create a structure for parent and educator collaborations for increased student achievement</p> <p>7a. working in meaningful relationships with faculty and parents to develop action plans for student achievement.</p> | <p>trust, learning, and high expectations and a personalized and motivating learning environment for students.</p> | <p>reading needs and levels of each student (including ELLs, students with disabilities, and struggling and advanced readers)</p> <p>i. In conjunction with special education and bilingual education teachers identify and select assessment strategies and devices that are nondiscriminatory to be used by the school, and take into consideration the impact of disabilities, methods of communication, cultural, background, and primary language on measuring knowledge and performance of students leading to school improvement.</p> <p>j. Work with teachers to develop a plan that focuses on the needs of the school to support services required to meet individualized instruction for students with special needs (i.e., students with IEPs, IFSPs, or Section 504 plans, ELLs, and students identified as gifted)</p> | <p>student engagement in the learning process</p> <p>b. Utilizes meaningful feedback of students, staff, families, and community in the evaluation of instructional programs and policies</p> <p>c. Proactively engages families and communities in supporting their child's learning and the school's learning goals</p> <p>d. Demonstrates an understanding of the change process and uses leadership and facilitation skills to manage it effectively</p> | <p>Voices and Perspectives</p> <p>c. Engages Families</p> <p>d. Builds Capacity to Manage Change & Demonstrates Personal Resolve and Response to Challenges</p> |
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| <p>professional development, practice, and student learning.</p> <p>b) Empower and entrust teachers and staff with collective responsibility for meeting the academic, social, emotional, and physical needs of each student, pursuant to the mission, vision, and core values of the school.</p> <p>c) Establish and sustain a professional culture of engagement and commitment to shared vision, goals, and objectives pertaining to the education of the whole child; high expectations for professional work; ethical and equitable practice; trust and open communication; collaboration, collective efficacy, and continuous individual and organizational learning and improvement.</p> <p>d) Promote mutual accountability among teachers and other professional staff for each student's success and the effectiveness of the school as a whole.</p> <p>e) Develop and support open, productive, caring, and trusting working relationships among leaders, faculty, and staff to promote professional capacity and the improvement of practice.</p> <p>f) Design and implement job-embedded and other opportunities for professional learning collaboratively with faculty and staff.</p> | | | | | | |
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| g) Provide opportunities for collaborative examination of practice, collegial feedback, and collective learning. h) Encourage faculty-initiated improvement of programs and practices. | | | | | | |
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| <p>Standard 2 – Ethics and Professional Norms Effective educational leaders act ethically and according to professional norms to promote each student’s academic success and well-being.</p> <p>Effective leaders: a) Act ethically and professionally in personal conduct, relationships with others, decision-making, stewardship of the school’s resources, and all aspects of school leadership. b) Act according to and promote the professional norms of integrity, fairness, transparency, trust, collaboration, perseverance, learning, and continuous improvement. c) Place children at the center of education and accept responsibility for each student’s academic success and well-being. d) Safeguard and promote the values of democracy, individual freedom and responsibility, equity, social justice, community, and diversity. e) Lead with interpersonal and communication skill, social-emotional insight, and understanding of all students’ and staff members’ backgrounds and cultures. f) Provide moral direction for the school and promote ethical and professional behavior among faculty and staff</p> | <p>ISLLC 5. Acts with integrity, fairness, and in an ethical manner</p> <p>--Ensure a system of accountability for every student’s academic and social success</p> <p>--Model principals of self-awareness, reflective practice, transparency, and ethical behavior</p> <p>--Safeguard the values of democracy, equity, and diversity</p> <p>--Consider and evaluate the potential moral and legal consequences of decision-making</p> <p>--Promote social justice and ensure that individual student needs inform all aspects of schooling</p> | | <p>Assessment # 1 – Demonstrate a comprehensive understanding and performance in data analysis, school improvement, and conducting the SIP process (to the extent possible).</p> <p>Focus Area: 1.2 – Analyze and review data, including but not limited to, state test results, and work with a faculty group/team to identify areas for improvement and interventions, with particular attention given to NCLB subgroups and low performing students. Focus Area: 3.2 – Review the school’s budget and other school resources with the internship principal. Detail how the resources are typically used; how the resources could be evaluated for adequacy; assessed for effectiveness and efficiency; and gave recommendations for improvement. Address specifically the impact of the budget on subgroups such as special education, ELL, and low socio-economic students. Present recommendations for improvement to a faculty or faculty group for input in the budget development process.</p> | | <p>IPSSL. 5. Leading with Integrity and Professionalism: The principal works with the school staff and community to create a positive context for learning by ensuring equity, fulfilling professional responsibilities with honesty and integrity, and serving as a model for the professional behavior of others</p> <p>a. Treats all people fairly, equitably, and with dignity and respect</p> <p>b. Demonstrates personal and professional standards and conduct that enhance the image of the school and the educational profession. Protects the rights and confidentiality of students and staff</p> <p>c. Creates and supports a climate that values, accepts and understands diversity in culture and point of view</p> | <p>a. Models equity and dignity</p> <p>b. Protects Rights and Confidentiality</p> <p>c. Recognizes the Strengths of a Diverse Population</p> |
| <p>Standard 8 – Meaningful Engagement of Families</p> | <p>ISLLC 6. Understands, responds to, and</p> | <p>CSF 13. Is a life-long learner continuously</p> | | | | |

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| <p>and Communities Effective educational leaders engage families and the community in meaningful, reciprocal, and mutually beneficial ways to promote each student's academic success and well-being.</p> <p>Effective leaders:</p> <p>a) Are approachable, accessible, and welcoming to families and members of the community. b) Create and sustain positive, collaborative, and productive relationships with families and the community for the benefit of students. c) Engage in regular and open two-way communication with families and the community about the school, students, needs, problems, and accomplishments. d) Maintain a presence in the community to understand its strengths and needs, develop productive relationships, and engage its resources for the school. e) Create means for the school community to partner with families to support student learning in and out of school. f) Understand, value, and employ the community's cultural, social, intellectual, and political resources to promote student learning and school improvement. g) Develop and provide the school as a resource for families and the community. h) Advocate for the school</p> | <p>influences the larger political, social, economic, legal, and cultural context</p> <p>--Advocate for children, families and caregivers --Act to influence local, district, state, and national decisions affecting student learning</p> <p>--Assess, analyze, and anticipate emerging trends and initiatives in order to adapt leadership strategies</p> | <p>learning and seeking out colleagues to keep abreast of new research and proven practices</p> <p>13a. working with faculty to implement research-based instructional practices.</p> <p>13b. working with professional groups and organizations.</p> | | | | |
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| <p>and district, and for the importance of education and student needs and priorities to families and the community.</p> <p>i) Advocate publicly for the needs and priorities of students, families, and the community.</p> <p>j) Build and sustain productive partnerships with public and private sectors to promote school improvement and student learning.</p> | | | | | | |
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ACTIONS Program
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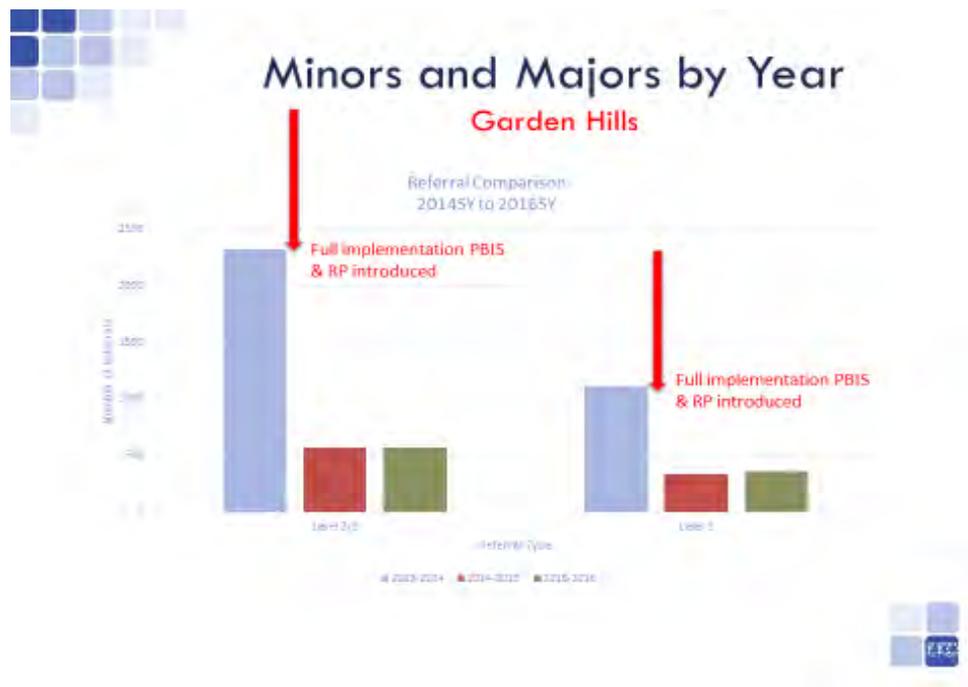
Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois’s ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Champaign Unit #4 School District for the past 16 years. I am pleased to see ESSA’s emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois’s focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student’s academic and social emotional success.

I have been involved with the Positive Behavior Intervention and Supports Network since 2000. In my various roles that I have played over the years (school social worker, PBIS Coordinator for the Champaign School District, Technical Assistance Coordinator for the Illinois PBIS Network, assistant principal at Garden Hills Elementary School, and Administrator for the ACTIONS Alternative Program), PBIS has been the framework from which all school and district improvement initiatives are grounded.

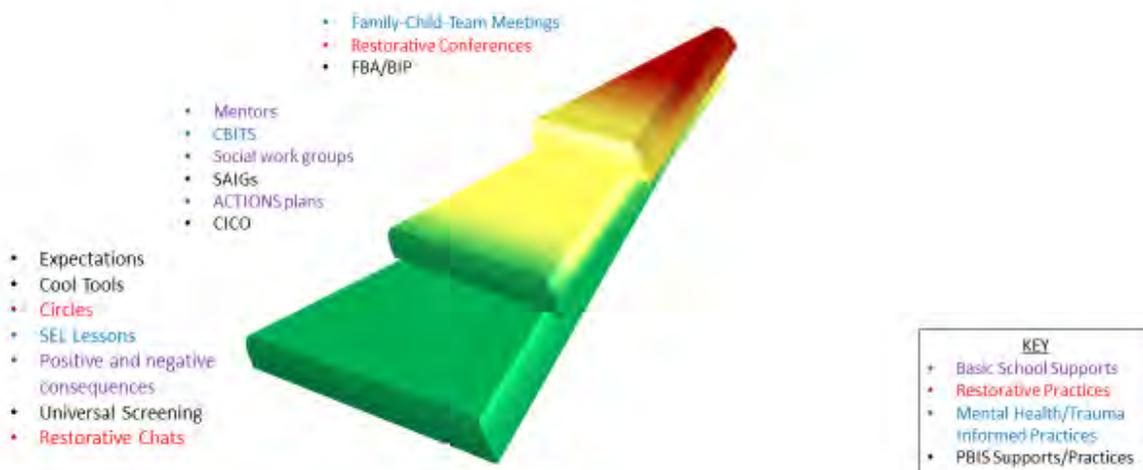
Most recently, at Garden Hills Elementary School in Champaign, we have utilized the PBIS framework to not only address behavior and discipline, but also mental health integration, restorative practice integration, socio-emotional learning integration, as well as trauma-informed practices. Garden Hills Elementary is the largest elementary school in Champaign with a population of 89% low income and a diverse student population of 67% Black, 15% White, 11% Asian, 5% Latino, students. The following are graphic representations of the positive work that has been done over the past few years:





Here is also a graphic that represents how Garden Hills has integrated all educational reforms as well as best practices for diverse students within the multi-tiered systems framework:

Continuum of Academic & Social Behavior Support: Integrated Continuum of Supports



Garden Hills Elementary School was also the first school in the Champaign School District to integrate mental health services within the regular school day. The work to do this was modeled by the PBIS Network Integrated Systems Framework. The research done by PBIS helped promote a prevention-based continuum of mental health promotion and intervention by bringing school and community mental health providers into established PBIS systems. Building from the foundational framework of PBIS, core features of the mental proposal operationally aligned systems, data and practices within the school to meet a common goal of mitigating the impact of mental health issues sufficient to support student academic and social achievement. The goal, to systematically build an expanded continuum of mental health supports integrated within a three-tiered-system of academic and behavior supports, has led to two, full days of mental health practitioners within the building during the week. On average, 15 students receive needed mental health assistance, as do their families, with barriers of wait-lists, funding and transportation being obsolete, each year.

The PBIS Network’s training, technical assistance, networking opportunities, as well as on-line opportunities for growth, have continuously supported myself, as well as the Champaign School District over the past 16 years. Every building in Champaign, Kindergarten through high school, utilizes evidence-based practices, such as: tier one systems of support, Check-in/Check-out, Social-Academic Instructional Groups, as well as Functional Behavior Assessments and behavior planning, due to this support. The benefits of attending network meetings, on-line meetings, as well as conferences, that the network provides, allows our district to work with districts like ourselves, benefit from a learning community, and stay abreast of best practices to serve our students. The implementation tools that the network offers also allows us to make sure that we are completing all aspects of interventions to the highest level of fidelity and integrity. Lastly, the district dually enters data into the School-Wide Information System (SWIS) so that we have up-to-date data to make the best data-based decisions that we can for our students and teachers.

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ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois’s plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Positive Behavior Supports and Interventions has been intricate to the success of the Champaign School District. I would be happy to talk with anyone about the benefits of supporting this work fully for schools. I can be reached at johnsoji@u4sd.org.

Sincerely,

Jill Mathews-Johnson, MSW, M.Ed., LCSW
ACTIONS Administrator, Champaign Unit #4

**Chicago Coalition for the Homeless
Feedback on the
ISBE ESSA State Plan Draft 2**

The following comments of the Chicago Coalition for the Homeless (CCH) relate to the portion of the ISBE ESSA State Plan Draft 2 (Draft Plan) on the McKinney-Vento Education for Homeless Children and Youth Program.

Overall, the Draft Plan includes many important statements on the rights of students experiencing homelessness and the state's plan to ensure that students are identified and properly served by school districts statewide.

However, ESSA's provisions regarding the education of homeless child and youth require specific statements and assurances that are not reflected in the Draft Plan. 42 U.S.C. Sec. 11432(g). There are several important statements and assurances that are not reflected in the draft at all including:

--A description of how homeless "children and youth are (or will be given the opportunity to meet the same challenging State academic standards as all students are expected to meet." 11432(g)(1)(A);

--A demonstration that the SEA and LEAS have developed and shall review and revise "policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention of homeless children and youths in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences." 11432(g)(I).

--A description of how youths will receive assistance from counselors to advice such youths and prepare and improve the readiness of such youths for college. 11432(g)(1)(K).

The Plan also should include the assurances required by ESSA, including assurances that the SEA and LEAS will adopt policies and practices to avoid stigmatization and segregation; that the LEAs will designate an appropriate staff person, able to carry out the duties required by the law, as the LEA liaison for homeless children and youth; that the SEA and LEASs will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian in accordance with provisions in ESSA; that the SEA and LEAs will adopt policies and practices to ensure

participation by liaisons in professional development and technical assistance activities. 11432(g)(1)(J).

The draft plan should also include descriptions of how the SEA will ensure compliance of LEAs in the State with the duties of LEAs set forth in ESSA and indicate the technical assistance that the State will provide to LEAS and how compliance efforts will be coordinated. 11432(g)(2).

In addition, there are other statements in the Draft Plan that do not fully reflect what is required by ESSA to be included in the state plan. For example, the draft does include a description of the SEA's programs to heighten awareness of school personnel of the specific needs of homeless youth, but the draft doesn't address programs for all of the types of school personnel listed in ESSA. These include liaisons, principals, other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel. 11432(g)(1)(D).

Similarly, there is a provision in the draft ensuring that homeless youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities. However, the draft does not include specifics regarding barriers to "magnet school, summer school, career and technical education, advanced placement, on-line learning and charter school programs," as required by ESSA. 11432(g)(1)(F)(ii). While there is some discussion of these programs in a different section of the Draft Plan addressing credit recovery, it is not complete.

Another provision in the ESSA requirements for the state plan that is not fully reflected in the draft relates to strategies to address enrollment delays. The draft should specifically address enrollment delays that are caused by "(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements."

CCH also urges that the activities set forth in the Draft Plan and the timelines be more specific, particularly regarding ensuring compliance with the new provisions of ESSA. For example, more specific data should be

reported and made available, including data regarding graduation rates and chronic absenteeism and the timeline for doing so.

The Draft Plan's section regarding the duties of the School District (LEA) Homeless Liaison should be more specific in several respects. The Draft Plan should specify that the LEA liaison must ensure that "homeless children and youths are identified by school personnel through outreach and coordination activities with other entities and agencies." 11432(g)(6)(A)(i). It should also state that the liaison must ensure that homeless children and youth are enrolled in, and have a full and equal opportunity to succeed in schools of the LEA. 11432(g)(6)(A)(ii). While the Draft Plan states that the LEA Liaison should ensure that homeless students receive the services needed to be successful in school, it should also specify that the services include Head Start, early intervention and other preschool programs. 11432(g)(6)(A)(iii). It should make clear that the public notice of the education rights of homeless children and youths in in a form that is understandable to "the parents and guardians of homeless children and youths, and unaccompanied youths." 11432(g)(6)(A)(vi). Similarly, the Draft Plan should explain that the LEA Liaison should ensure that homeless families children and youth shall receive referrals to health care, dental care, mental health and substance abuse, housing and other services, and that the parents and guardians are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children. 11432(g)(6)(A)(iv) and (v). The Draft Plan should also state that the LEA Liaison shall ensure that enrollment disputes are mediated in accordance with ESSA; that the parent or guardian or unaccompanied youth is fully informed of all transportation services, including to the school of origin and is assisted in accessing transportation and that unaccompanied youth are enrolled in school. 11432(g)(6)(A)(vii), (viii) and (x).

The Draft Plan should explain more clearly the choice of schools and the definition of the school of origin and highlight the right to continued attendance in the school of origin for as long as the student is homeless or for the remainder of the academic year in which permanent housing is acquired. While it is mentioned, the Draft Plan should highlight ESSA new provisions of ESSA such as preschool being included in the definition and

the receiving school provision. It should also include more information about the right to transportation, including school of origin transportation, comparable transportation, and transportation in cases where the lack of transportation presents a barrier. It should make clear that transportation is provided until the end of the academic year in which housing is acquired.

Regarding immediate enrollment, the right to immediate enrollment applies to all schools selected in accordance with ESSA, including the school of origin. The Draft Plan indicates that immediate enrollment applies more narrowly to schools other than the school of origin. This section should include the definition of “enrollment” in ESSA as “attending classes and participating fully in school activities.” 11434A(1). The Draft Plan should state that the student has a right to immediate enrollment “even if the child or youth is unable to produce records normally required for enrollment, such as previous academic records, records of immunization and other required health records, proof of residency, or other documentation.” 11432(g)(3)(C)(I). The Draft Plan should explain how LEAs should implement the provision regarding missed application or enrollment deadlines during a period of homelessness. The Draft Plan should also make clear that the enrolling school shall immediately contact the school last attended to obtain relevant academic and other records and that records should be maintained so that they are timely available when a child enters a new school or school district.

The section of the Draft Plan on Dispute resolution should make clear that disputes over “eligibility, or school selection or enrollment in a school.” 11432(g)(3)(E). It should make clear that enrollment includes attending classes and participating fully in school activities. The Draft Plans should make clear that the child or youth “shall be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals.” 11432(g)(3)(E)(i). The dispute process should provide a way for the parent or youth to initiate the dispute. It should require that pre-dispute resolution attempts and meetings be conducted in a fair manner by the liaison and without coercive methods including the use of high level administrators, attorneys and investigators. The Plan should provide that LEAs must turn over any investigative or other pertinent material to the family, youth or their representative within a day

of issuing the dispute letter. It should also include an overall statement of the goal of fairness and sensitivity to families and youth. The Plan should include more detail on training of ombudspersons.

The Draft Plan should include more information about the definition of “homeless child or youths,” the definition of “unaccompanied youth,” including that the definition of “unaccompanied youth” now includes “child” in accordance with ESSA. While the definition of “homeless children and youths” is referenced in the section regarding the SEA’s procedures to ensure that youths and youths separated from the public school are identified and accorded equal access to secondary education, the definition and explanation applies to all sections of the Draft Plan regarding homeless education and should be included and explained at the start of this section.

More information should be provided about credit recovery options throughout the state as well as procedures to removing barriers to receiving appropriate credit. Overall, there should be more specifics about the duties of the SEA and LEAs to review and revise policies and address barriers related to identification, enrollment, transportation, retention, fees and fines, absences ,and academic and extracurricular activities (including magnet school career and technical education, advanced placement, online learning, and charter school programs). While this section of the Draft Plan states that procedures in Illinois law eliminates barriers to academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school program, the Draft Plan does not identify such provisions of Illinois law. The experience of CCH is that many barriers exist for students who are homeless in these areas and that more discussion is needed in the Draft Plan of specific barriers in each of these areas and how such barriers should be removed. In particular, students who are homeless face significant barriers to magnet and selective enrollment schools with cumbersome application processes and low representation of students who are homeless in such schools. Lack of transportation services to these schools also acts a barrier to homeless students’ enrollment in the schools. The Draft Plan should include specific ways that districts around the state should work to ensure that all of its educational options are available to students who are in homeless

situations. Specific timelines and activities should be included with respect to removing barriers and reviewing and revising policies and practices that act as barriers. Input should be sought from the LALs, McKinney-Vento eligible families and youths, their representatives or advocates, and other staff or professionals. An examination of district forms, websites, informational materials, procedures/practices, and application processes and deadlines should be reviewed to identify and remove potential barriers. SEA and LEA policies and practices must ensure that participation of McKinney-Vento eligible students or families is not limited by application deadlines or procedures.

Regarding preschool, the State Plan should direct LEAs to ensure that staff be more proactive about reaching out and connecting families directly to preschool and early childhood options. The plan should emphasize the duty to find students not enrolled in school, including preschool students.

The Plan should detail how monitoring will be done and that it must solicit feedback and surveys from the families, students and social service or advocacy agencies that interact with the LEA. The Plan should also include information on comparable services, including with respect to special education, English Language Learners, career and technical education, gifted and talented programs, nutrition programs and transportation. The Plan should also include information about Title I set-asides for homeless students.

The Draft Plan refers to the ISBE state policy on homeless education as being adopted in 1995. The State Policy was revised in 2005. The Draft Plan should refer to the most recent ISBE Policy, the ISBE Registration Guidance that is updated annually, the Illinois Education for Homeless Children and Youth Act, the Equal Access Regulation and relevant provisions of the Illinois School Code.

December 27, 2016

Illinois State Board of Education
100 W. Randolph, Suite 14-300
Chicago, IL 60601

RE: Comments on ISBE ESSA State Plan- Draft#2

Dear Dr. Smith,

On behalf of the Chicago Lawyers' Committee for Civil Rights (CLC), we thank you for the opportunity to provide input on the ISBE Every Student Succeeds Act (ESSA) State Plan Draft #2. CLC's Educational Equity Project is dedicated to protecting and promoting students' access to education by addressing and challenging individual and systemic barriers that preclude students from gaining a meaningful education. As such, we are taking this opportunity to provide feedback, largely on the topic area of student discipline, on behalf of the individuals and communities we serve.

In reviewing Draft #2 and participating in several listening sessions, we have appreciated ISBE's dedication in seeking diverse voices in this process and building a plan that is developed through collective input. We also support the leadership's commitment to "interrupt those practices that have left far too many of Illinois' most vulnerable behind and without real access to opportunity" (Superintendent Smith, Aug. 2016). We believe that Draft #2 can be a meaningful opportunity to support educational equity for all students throughout Illinois. To further this goal, our primary recommendation is that ISBE:

Incorporate standards and supports through the Illinois plan to help schools successfully reduce excessive and inequitable discipline and create a positive school climate by integrating aspects of PA 99-0456 ("SB100") and PA 98-1102.

As ISBE is aware, Illinois has already undergone an extensive legislative process to address the excessive and inequitable discipline practices and policies that plague the entire state education system. This process included bringing legislators, community advocates, and school practitioners to the table to work out a mutually agreeable statewide plan to address school discipline. The result is embodied in two laws, (1) PA 98-1102, which places requirements on schools and the state agency to publicly report discipline data and hold schools accountable for improvements over time and (2) PA 99-0456 ("SB100"), which outlines standards in school discipline processes and encourages schools to train and support staff and students in building a positive school climate.

ISBE now has an opportunity to further support the implementation of these two laws by integrating aspects of their requirements into the states' ESSA plan. This will streamline information and accountability processes in a way that maximizes the impact of efforts made by local schools and the state agency. We recommend integrating PA 99-0456 ("SB100") and PA 98-1102 into the Illinois' plan in the following ways:

1. Include disciplinary data (e.g. suspension and expulsions, referrals to alternative schools, etc.) as an element of the school quality indicators used for accountability.

Applicable Plan Section: 3.1 Accountability System

Rationale:

- This would not be a completely new responsibility on schools in that PA 98-1102 already has standards for schools in reporting discipline data to ISBE annually. Additionally, ISBE is responsible for holding accountable those schools with the highest numbers of exclusionary discipline and disparities and facilitating the implementation of a school improvement plan.
- This would improve communication and information sharing between the state agency and local schools by ensuring the standards for discipline are consistent, highlighting the progress schools have made, and identifying the resources available to schools that are noted as struggling and in need of support. By integrating discipline data into the state's plan for accountability, the state agency is better able to track schools' needs and connect them to additional resources and supports. The state agency also benefits by institutionalizing a process to monitor and develop resources that support schools in school climate improvement strategies.
- School discipline should be explicitly included because it is an area that ISBE has received repeated feedback on in the documented public comments and listening sessions. It is also an area that is clearly highlighted by national advocacy organizations as a meaningful opportunity to address an equity deficit for vulnerable students:

| | |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Education Association | <p>"The Every Student Succeeds Act helps states and school districts reduce the overuse of exclusionary discipline practices, a key factor in the school-to-prison pipeline. State plans must address support for local educational agencies to improve school conditions to enhance student learning, including through reducing the overuse of discipline practices that remove students from the classroom."</p> |
| Learning Policy Institute | <p>"Including student suspension and expulsion data as indicators can shed light on both school climate and students' opportunities to engage with curriculum, while also creating incentives for schools to develop approaches to classroom management and</p> |

| | |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>school discipline that reduce the use of exclusionary discipline strategies. Evidence shows that removing students from school for disciplinary purposes has a negative impact, sharply increasing the likelihood that they will drop out of school. This outcome also contributes to expanding the achievement gap because students of color typically are suspended out of school for the same offenses at higher rates than their white peers. Research also indicates that tracking suspension and expulsion data by student group can help highlight racially disparate practices, and promote positive behavioral interventions that will improve student engagement and academic success. Including these indicators in a state accountability system could encourage schools to adopt more productive social-emotional programs and restorative justice practices to improve students' sense of belonging and self-efficacy”</p> |
| <p>The Education Trust</p> | <p>“Benefit: • Including discipline measures in school ratings could draw attention to exclusionary discipline practices that research shows a) negatively impact students and b) are not used equitably. • High discipline rates identify an actionable problem: Research has identified appropriate interventions that improve school climate and reduce suspensions and expulsions. • While schools with high proficiency and graduation rates generally have lower discipline rates, there are schools that do well on these measures, but suspend or expel high percentages of students. These schools could slip under the radar if school ratings don't take discipline rates into account.</p> <p>Considerations/Warnings • Discipline data may be easy to game. If schools know that their ratings depend in part on their discipline rates, they may stop reporting accurate suspension and expulsion rates. • If schools (and districts) know that reducing discipline rates will improve their school ratings, they may respond in unhelpful ways – e.g., by disallowing the use of suspension, without introducing practices such as restorative approaches or providing other teacher training.”</p> |

- While we support the use of a school climate survey, its scope is limited to providing “immediate feedback on how students, parents, and school personnel perceive their school's particular climate for learning,” ([National School Climate Center](#)). By including school discipline data as a complementary indicator, the state will have information to assess the outcomes of policies and practices within the school which, when combined with the school climate survey, can provide a more robust perspective of the experiences of students.

2. Include discipline data on the annual state and district report cards that are required under ESSA. This data should be disaggregated according to the provisions outlined in PA 98-1102.

Applicable Plan Section: 3.1 Accountability System

Rationale:

- PA 98-1102 requires that public reporting on discipline “shall include data on the issuance of out-of-school suspensions, expulsions, and removals to alternative settings in lieu of another disciplinary action, disaggregated by race and ethnicity, gender, age, grade level, limited English proficiency, incident type, and discipline duration” 105 ILCS 5/2-3.160(a). This provision ensures information is provided to the public that highlights outcomes for particular populations within the school. By integrating this information into the school report card, the state agency can ensure the information exist in a way that is accessible to community stakeholders so that all parties are informed and can meaningfully engage in conversations about the success and challenges of their school.
- Much of this information is already reported as part of the U.S. Department of Education’s Civil Rights Data Collection. By also including it in the state report card, ISBE ensures the information gets to schools and communities in a more effective manner that can better support ongoing conversation around school improvement.

3. Utilize the IL-EMPOWER system to provide support to schools targeted for school improvement in the area of school discipline. Additionally, ISBE should build out supports within an MTSS framework to empower all schools in developing and sharing successful strategies at reducing exclusionary discipline and improving school climate.

Applicable Plan Section: 3.2 Identification of Schools

Rationale:

- PA 98-1102 requires targeted schools to submit a school improvement plan:

“Beginning with the 2017-2018 school year, the State Board of Education shall require each of the school districts that are identified in the top 20% of any of the metrics described in this subsection (b) for 3 consecutive years to submit a plan identifying the strategies the school district will implement to reduce the use of exclusionary disciplinary practices or racial disproportionality or both, if applicable. School districts that no longer meet the criteria described in any of the metrics described in this subsection (b) for 3 consecutive years shall no longer be required to submit a plan.

This plan may be combined with any other improvement plans required under federal or State law” 105 ILCS 5/2-3.160(b).

- To date, schools have not received guidance from the state agency on what a school improvement plan must look like and how ISBE will monitor it in accordance with PA 98-1102. ISBE could use the planned framework for IL-EMPOWER to meet this need and maximize the impact of the state’s efforts.
- The IL- EMPOWER system could offer schools comprehensive and differentiated supports and services to address the increased needs identified in the area of school discipline. Because it uses an MTSS model, it is ideal to support districts in developing interventions that are proactive, reactive, and aimed at addressing the root causes of students’ behaviors with a focus on teaching behaviors rather than excluding students for punishment.

4. Expand the access of professional development outlined in Section 4.2 to other non-educator stakeholders in the school building when possible, including administrators, security staff, school board members, etc. Additionally, create an expanded capacity for community-based agencies and organizations to provide support to schools when appropriate, in targeted areas for improvement.

Applicable Plan Section: 4.2 Support for Educators

Rationale:

- We strongly support “4.2 Support for Educators”, specifically the use of Title II funds for professional learning for educators in the area of social and emotional issues; cultural, racial, and socio-economic competence, conflict management; students with disabilities; family and community engagement; trauma and behavioral health issues; restorative practices; cultural competence; anti-racism; recognizing implicit bias; and actualizing anti-bias approaches.
- This aligns with provisions in PA 99-0456 that encourage schools to “*provide ongoing professional development to teachers, administrators, school board members, school resource officers, and staff on the adverse consequences of school exclusion and justice-system involvement, effective classroom management strategies, culturally responsive discipline, and developmentally appropriate disciplinary methods that promote positive and healthy school climates*” 105 ILCS 5/10-20.14 (c-5). However, recognizing that many of these issues can be greatly supported by the commitment and involvement of non-educator stakeholders within the school environment, we recommend that when appropriate the ISBE encourages training across multi-disciplinary teams. Additionally, ISBE should be mindful to not create arbitrary barriers that would prevent other beneficial stakeholders from accessing these training opportunities.

- There are many community-based resources that could be cultivated to better support and serve school districts if the state agency can facilitate both the connection and the resources needed to support a sustained effort.

Other noteworthy suggestions based on comments highlighted in feedback sessions CLC has attended:

- Lower the n-size to 10: While the current proposed n-size of 20 is a major improvement for IL, there is concern that there are important populations that will be overlooked with a larger n-size than is necessary. It is often very easy for schools in their efforts to balance the needs of the majority of the student population to lose sight of the unique needs of smaller populations of students. We encourage ISBE to further consider the Alliance for Excellent Education’s [recommendation](#) of 10:

“As states consider changes to their accountability and improvement systems, they should set their n-size at 10 or fewer students to ensure they capture the greatest number of student subgroups for reporting, accountability, and improvement purposes under ESSA. When states include these schools in their accountability and improvement systems, the schools become eligible for school improvement funding and direct student services under the law. In addition, states may choose to target other federal and state resources to these schools, such as professional development funding under Title II of ESSA. States and districts should prioritize schools with the greatest numbers and percentages of low-performing students as measured by student achievement and high school graduation rates”.

- Support the Academic Growth to Proficiency Model or a hybrid that largely incorporates this model: We strongly support a model that is accessible for parents and community members to understand and engage with school-based stakeholders in a meaningful way.
- Support the ongoing engagement of diverse stakeholders: ISBE should utilize multi-disciplinary teams to work on the continued implementation of ESSA and the development of tools (such as the equity audit), supports and resources to improve the success of schools and students throughout Illinois. Examples would include requiring teams to be comprised of diverse stakeholders, such as parent groups or a youth groups, as part of the planning and development process; requiring information sharing and learning as a part of the team’s work to ensure that all participants can engage in a meaningful way; creating readers’ guides or online webinars to break down complex information; providing opportunities for public comment and feedback, etc.

For more information about our comments, please feel free to contact me at 312.888.4190 or cmoore@clccrul.org. Thank you again for this opportunity to provide feedback and we look forward to continuing to support the growth of our state education system.

Sincerely,

/s/ Candace Moore

Candace Moore,
Staff Attorney- Educational Equity Project
Chicago Lawyers' Committee for Civil Rights

Dear Illinois State Board of Education:

On behalf of the College Board, I'm pleased to submit comments on providing important opportunities to Illinois students and fulfilling new requirements under the Every Student Succeeds Act (ESSA). Our comments focus on accountability and Advanced Placement (AP) funding opportunities. We would like to applaud the ISBE for its commitment to making sure that low-income students can afford AP exams in 2017, and hope that ISBE will continue that commitment will continue in 2018 and beyond. We would also like to commend the Board for considering Advance Placement opportunities for students in its draft accountability system.

Thank you for your continued partnership. We look forward to further discussing how we can support students, families, and educators across the state.

The ISBE ESSA State Plan recommends a college and career readiness indicator with multiple pathways. The College Board supports the recommendation to include AP as part of the college and career readiness framework.

Illinois continues to make progress in increasing the number of students who have access to AP opportunities. AP courses give students the opportunity to pursue college-level course work while still in high school. Approximately 38% of graduates from the class of 2015 took at least one AP Exam, with roughly 25% earning a score of 3 or higher. The potential college tuition savings attributable to Illinois students who scored a 3 or higher on AP Exams in 2016 was nearly \$177 million.

ESSA requires that states must include at least four indicators in their high school accountability systems, including at least one "additional indicator of school quality or success." The additional indicator must allow for "meaningful differentiation in school performance" and be "valid, reliable, comparable, and statewide." **AP meets each of these requirements.**

AP in Accountability

In 1999, the U.S. government established an AP Test fee grant to assist low-income students in paying for AP Exams. Those grant fees, in addition to the College Board fee waiver, have either fully covered the cost of the exams or reduced the out-of-pocket expenses for low-income students. Under ESSA, this grant is consolidated into one large block grant with 48 other programs under Title IV.

In addition to the college and career readiness indicator listed, Illinois could consider other ways to add AP as the additional indicator, each of which focuses on AP performance while continuing to incentivize increased AP access and participation.

- **AP and International Baccalaureate (IB) alone**
 - Percentage of students scoring a 3 or higher on at least one AP Exam and/or a 4 or higher on at least one IB exam over the course of their high school experience
- **AP bundled with other indicators but given extra weight**
 - Percentage of students accomplishing at least one of the following over the course of their high school experience: *State provides a list that includes scoring a 3 or higher on at least one AP Exam. (Students scoring a 3 or higher on an AP Exam receive extra weight in the calculation.)*
- **AP participation bundled with other indicators that do not require an assessment**
 - Percentage of students participating in at least one of the following during high school: *State provides a list of advanced coursework options and/or college and career readiness activities.*

- **AP bundled with other “nationally recognized” assessments of college and career readiness**
 - Percentage of students achieving college and career readiness benchmarks on at least one of the following over the course of their high school experience: *State provides a list of nationally recognized assessments that includes scoring a 3 or higher on at least one AP Exam.*

AP Funding

In 1999, the U.S. government established an AP Test fee grant to assist low-income students in paying for AP Exams. Those grant fees, in addition to the College Board fee waiver, have either fully covered the cost of the exams or reduced the out-of-pocket expenses for low-income students. Under ESSA, this grant is consolidated into one large block grant with 48 other programs under Title IV.

College Board commends the decision ISBE has made to reallocate Title I funds to support low income exam fees for students in the spring of 2017.

Thank you for considering our comments. As a long-standing partner to educators in Illinois, the College Board is happy to supply additional information or answer follow-up questions.

Greg Walker *Vice President*
Midwestern Regional Office

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ESSA Illinois State Plan Draft #2 Feedback

3.1 Accountability System - Student Success and School Quality Factor

School climate and culture is a research-based indicator of school quality. [Research](#) has shown that positive school climate is tied to high or improving attendance rates, test scores, promotion rates, and graduation rates. The surveys (e.g. Illinois 5Essentials) can be administered in nearly all schools so they would be almost universal in application for an accountability system. Also important, the surveys can measure changes in school climate and culture and can be influenced directly by schools and districts.

General Comments about Section 3.2 Identification of Schools and 3.3 State Support and Improvement for Low-Performing Schools

1. **Labor-management collaboration:** Any school improvement strategy should at its foundation include a commitment to labor-management collaboration. In order to plan, implement and sustain the difficult improvements required, a strong commitment to work collaboratively by labor and management will increase the likelihood improvements are deep and durable.
2. **District improvement, not just school improvement:** In order for schools to improve, the district (system) of which they are a part must also improve. A plan and commitment from the district to support the school and make the necessary changes to enable school improvement is essential. All district policies and practices that may contribute to low or high performance should be examined.
3. **School leadership:** The importance of strong school leadership cannot be understated. Both experience and research attest that a transformational leader is a keystone to improvement in a low-performing school. Illinois should utilize the funding opportunities in Title II (e.g. Teacher and Leader Academies) to support the preparation of candidates for high-needs schools with a year-long residency or similar supports. If possible or needed, consider partnering with other states. [Colorado](#) and [New Mexico](#) are among the states that have helped to address this principal shortage with state level action.
4. **Broader and bolder:** When ISBE is required to take more rigorous action for schools not exiting comprehensive status, consider requiring the implementation of a broader approach instead of a narrow prescription to “turnaround” strategies. Follow examples like full service community schools and Promise Neighborhoods in Title IV to generate deeper community engagement, expansion of access to quality early childhood experiences, mental health services, social services targeted to family needs, and out-of-school time opportunities.

3.2 IDENTIFICATION OF SCHOOLS

p. 40

Question: What is the framework for continuous improvement that IL-EMPOWER is grounded upon? Will schools and districts be required to use it? Will external partners be required to use it? Will equivalent frameworks be acceptable? Can it be developed collaboratively with stakeholders?

Comment: We support the use of a framework for continuous improvement. There are many existing examples and they are relatively easy to adapt or develop. The key is developing educators and groups of educators who can use them effectively. External partners are essential to support the use and implementation of such frameworks.

3.2 – A. Comprehensive Support and Improvement Schools

p. 41-42

Comment: We support the concentration of resources by identifying first the lowest performing 5% of schools before identifying high schools.

p. 41

Comment: We support prioritizing a larger allotment of funds towards comprehensive schools.

Comment: We support the 3-4 year span for improvement timeline after identification for Comprehensive and Targeted Schools.

Comment: We support the exit criteria proposed that includes a growth trajectory for students, coupled with a plan for sustainability, theory of action, goals, strategies, and progress monitoring plan.

3.2 - B. Targeted Support and Improvement Schools

p. 43-44

Question: For the identification of Targeted Support Schools, why was this methodology chosen? Would it use all metrics on the accountability system (e.g. state assessment, graduation rate, student success/school quality metric)? Or just one summative metric?

Question: The identification for Targeted Support Schools uses an achievement gap 1.5 times as large as the greatest achievement gap. What is the rationale behind this metric?

Comment: Keeping the list of Targeted Support Schools small makes sense in order to concentrate resources and attention. Achievement gaps are important wherever they occur, so it may make sense to publish a list of achievement gaps for all schools and districts and then only identify those that meet the criteria for Targeted Support.

3.3 STATE SUPPORT AND IMPROVEMENT FOR LOW-PERFORMING SCHOOLS

3.3 - A. Allocation of School Improvement Resources

p.45

Question: Will current SIG funding be impacted? Also, will current SIG schools be exempted or delayed from the ESSA requirements? Will they be considered as Comprehensive during SIG Implementation Years (2018-19) and the SIG Sustainability Years (2019-20)?

Comment: We recommend that SIG schools be allowed to opt into IL-EMPOWER services, but not required until they complete their SIG cycle. SIG schools would be best served to complete their grant period without additional mandated requirements. Past experiences in IL suggest that participation in more than one major improvement program (from different sources) creates confusion for schools and districts as well as external partners.

Question: What is the governance structure of IL-EMPOWER? How will it be designed to support struggling schools?

Comment: In order for IL-EMPOWER to attract a diverse set of organizations that can provide resources to schools and districts, ISBE should create a qualification process that gives organizations the ability to work from diagnostic/audit stages to planning stages to implementation stages and finally sustainability. Limiting the *breadth* of participation for external partners could reduce the *depth* of change and improvement possible thereby making participation less attractive and less impactful.

Comment: We support the inclusion of networked sets of educators from peer schools and districts who can offer support.

p. 46

Question: Will external providers be eligible to provide diagnostic and planning services or will IL-EMPOWER conduct those services?

Comment: For continuity, consistency, and coherence we recommend that external partners be permitted to provide diagnostic and planning services. To do in-depth diagnostic and planning work takes significant time and strong relationships. External partners should be able to participate all the way through the diagnostic, planning, and then direct support services (implementation).

Comment: We support that subgrants may be allocated in either the year of identification or the year after. This allows schools who did not receive grants the first time to reapply and improve their plans.

Comment: We support the use of a planning year (Year 1), unless there is strong evidence of readiness, and then to make awards for the maximum amount of time (3 years) for implementation on a formula basis. We support the requirement of a strong plan for monitoring.

Comment: We support the level of need of the school and the quality of the plan to be used when determining funding distributions.

Comment: We support the inclusion of readiness to implement and strongest commitment to implement in the formula-based funding.

3.3 - B. Evidence-Based Interventions

p. 48

Question: The drafts states, "In a planning year, Illinois will use 95 percent of these funds..." Does this mean that ISBE will use/spend 95% of its 7% Section 1003 funds or will these funds go to districts?

Question: In the planning year, will the needs assessments, curriculum audits, equity audits, and other diagnostic supports and services for LEAs and schools to develop strong improvement plans be centralized or standardized or will districts and schools be able to choose the approved audits and providers to support this work?

Question: Will the audits be standardized? How standardized or centralized?

Comment: We recommend that the audits be based on a common or organizing framework for continuous improvement that creates consistency across schools and districts. A common framework will permit easier cross district collaboration and cooperation. We also recommend that a variety of assessments and audits be permitted or approved provided they align to the framework for continuous improvement.

Comment: We recommend districts and schools have autonomy to choose among assessments and audits. An approval process for needs assessment and audit tools could be developed to ensure alignment to a framework for continuous improvement and quality.

Question: Who will participate in the audits?

Comment: We strongly recommend that external partners have the opportunity to co-lead and/or participate in the audits and the planning activities for continuity and the possibility of a continued partnership to support implementation of plans. Districts and schools are not always able to see opportunities or barriers without the support of a qualified "other".

Question: Can an example or definition of an equity audit be included? Does equity audit relate to the Periodic Resource Allocation Review requirement?

Comment: We recommend including an analysis of resource equity within a district and within a school. A review of current use of resources and the distribution of resources is highly recommended at the planning stage and periodically (possibly annually or bi-annually).

3.3 - C. More Rigorous Interventions

"In order to support districts and schools in their selection of "evidence-based practices" for the purposes of school improvement, ISBE is collecting an exhaustive list of resources that it shall share with the field in the spring of 2017."

Comment: We do not feel that collecting an exhaustive list is the most beneficial approach to the requirements for evidence-based practices. It would be better to provide school and districts with training and guidance on identifying, selecting and implementing the evidence-based practices or train

external partners to do so. If schools and districts treat the list of resources as an a la carte menu, it will not support a coherent or comprehensive approach to planning and implementing school change. It may however be useful to keep an inventory or catalog of practices chosen and the results to help others to identify peers engaging in similar work and then to track the results of the practices.

Question: Can districts work in network / collaboratively to concentrate services / funds?

Comment: The resources and support structures should be configured to promote cross-district collaboration and networking.

Question: Can external partners lead or form networks of districts / schools?

Comment: The resources and support structures should promote external partners to lead and/or form networks of districts and schools. The networks would promote peer learning and problem-solving and also create resources efficiencies. Networking activities should be a permissible, promoted and funded activity.

ISBE Questions from Reader's Guide #2:

How do districts and schools in Illinois plan to meaningfully engage stakeholders throughout the support and intervention process? How will districts and schools make information about the effectiveness of these efforts easily accessible to stakeholders?

- Engage stakeholders in the needs assessment and planning stages.
 - Require communication through the school's website, Board meetings, and in written communication sent home; require use of communications in languages if a certain number of students are non-native English speakers.
 - Monthly or quarterly meetings/communication for feedback (two-way communication) on plan and progress; ensure a meaningful number of stakeholders are engaged.
 - Family and Community Engagement Plan with monthly/quarterly strategies/events/activities to engage stakeholders in the school and students' lives. The pursuit of Community School practices is highly recommended.
 - The SIG Needs Assessment was too clunky and not necessarily relevant for all communities (e.g. parents did not know how to answer many questions). Sample template(s) may be available through ISBE, but local sites should have flexibility about how they identify their needs, so long as **meaningful** community, staff, and student input is gathered and used.
- What are the "exit criteria" proposed for each improvement category? How and when will schools be reclassified? In what ways does the reclassification process allow for thorough, holistic, public review of school performance, and/or the consideration of additional exit criteria? How will the reclassification of schools impact the state's progress towards long-term goals and affect measures of interim progress?
- Exit criteria should show a trajectory towards ensuring students are college and career ready. This could mean being able to meet the 3-year interim goals towards 90% students meeting expectations on state assessment and 90% graduation rates. If these measures are used, then reclassification ensures that the school is making progress towards the state's long-term goals.

- Alternative measures could also be used, such as 5Es survey data (e.g. to ensure a safe and healthy learning environment) or local assessment measures could be used.
 - Additionally, the presence of a long-term plan for sustainability, as recommended by ISBE, would help ensure the school is on an appropriate path and committed to improvement.
- Does Illinois identify Comprehensive Support & Improvement schools at higher rates than are required within the law (e.g. bottom 10% of Title I schools; graduation rates below 75%)? What are the pros and cons of Illinois' current identification system? How does it impact how districts and states ensure equitable outcomes for student subgroups?
- The Comprehensive Support identification limits the number of schools identified, which allows a larger concentration of resources towards these schools. This identification process is not higher than what is allowed within the limits of the law. The pro is that these schools often need significant resources, and limiting the number of schools identified helps to better ensure that these schools are given the appropriate support to improve. The con is that fewer schools are identified, warranting questions of equity. However, if Comprehensive schools are successful and their work is documented, it creates a better body of knowledge and experience that will benefit new schools entering identification.
 - The current method for identifying Targeted Support schools appears to limit the number of schools identified (since schools need to have subgroup 1.5 times the average gap – these will be the most severe gaps, presumably with many others with gaps not identified). Since financial resources are not **required** to be used for Targeted Support Schools, the harm in identifying more schools is unclear. The current recommended method for identification limits the number of schools identified which could under-identify schools with significant achievement gaps. Schools could potentially be identified without allocation of state resources. However identification alone will not produce equitable outcomes.

Beyond differences in funding levels, how will districts and schools in Illinois identify, and take steps to remedy, inequities in resources (for example, course offerings, books and learning materials physical condition of buildings) among schools and among districts? How, if at all, are resource inequities among schools and districts already being calculated and/or tracked?

- School funding in Illinois must be changed to reduce inequity. Grant money will not be impactful if base levels of funding remain low and inequitable.
- The need for resources could be part of the plan submitted to ISBE, which may need to include building conditions. Schools should be able to apply for funds to correct these differences and needs. These inequities are ubiquitous across the state and even within districts, and physical conditions or physical resources often have an effect on student morale, self-concept, etc.
- Education Resource Strategies seems to have several free tools and has developed tools for other states on their website that might help districts and schools to examine resource allocation and consider changes in allocations.
- Some states and districts have already implemented equity audits as stand-alone efforts or as part of continuous improvement work. They typically look at teacher, programmatic, and achievement equity. The places include Madison, WI, Holland, MI, North East, TX, and the state of Nebraska.
- Districts and their unions should also consider collaborating to examine practices and contract provisions that contribute to resource inequities in schools or across the district. For example,

staffing practices or provisions often disadvantage struggling schools when they should advantage those schools.

- How might ISBE best incorporate a measure of the quality of an LEA plan as a part of the formula for distributing funding?

Quality Plans will include:

- Detailed diagnostic data (needs assessment) on the root causes of low achievement.
- A detailed plan that is aligned to the needs assessment.
- The plan uses a small number (2-5) of targeted, critical strategies to address low achievement.
- Commitment separately and together from the school board, district, union, and school to the small number (2-5) of strategies including the role each will play in supporting the strategies - i.e flexibility, changes in current practices.
- The plan includes implementation, outcomes and monitoring associated with the small number of strategies.
- A building leader who demonstrates the competencies of a turnaround leader.
- In addition to student academic learning, the plan demonstrates attention to student and teacher culture & climate, student non-academic needs, and family and community engagement.

- ISBE is collecting an exhaustive list of resources that it will share with the field in Spring 2017 to help support districts and schools in their selection of “evidence-based practices.” What might those resources include?

- Please see the next response (below).

- While some ESSA programs allow the use of all four levels of evidence - 1. Strong 2. Moderate 3. Promising 4. Research-based rationale - Section 1003 of ESSA requires that schools identified as comprehensive and targeted use these funds only for interventions reflecting one of the highest three levels of evidence (Strong, Moderate, and/or Promising). Given the possible dearth of interventions that meet one of these evidence levels, how might Illinois best meet the “evidence-based” requirement?

- Evidence-based practices are important to ensure that districts and schools have considered what research can tell them about how they choose practices to address their needs. Just as important is to use the research to inform the implementation of practices. Once the practices are chosen, it is most important to consider the local context and needs for successful implementation.
- As recommended by a [recent report](#) from the Center for American Progress, it may not be as important to create a set list of evidence-based practices, but rather for ISBE to provide support for districts and schools to select and implement practices that match their specific needs. A pre-ordained list may narrow the options and choices for a district and school too soon in the process. It is ultimately more important that the strategy fits the site-specific issues and a sound plan for implementation is developed. A practice with a strong basis in evidence is not useful if it is not put in local context and/or poorly implemented.
- We recommend that ISBE look at best practice exemplars of institutional support systems used by districts and schools to match their needs with possible evidence-based practices. National

level evidence-based practice learning resources like the [What Works Clearinghouse](#) are making efforts to improve search capabilities and data warehousing that enables schools to find niche interventions and case studies that fit their context.

- Districts and schools, particularly low-performing schools, often do not have the research capacity to adequately diagnose their own needs, find relevant evidence-based practices, fit possible interventions to their context, and evaluate the effectiveness of practices. ISBE might consider piloting a state-based implementation or policy-to-practice educational team that would be directly accountable to the state. This could be in concert with activities to boost the capacity of the regional laboratories or strategic [alliances](#) to pull in research resources from non-profits and higher-education institutions. Such efforts would build implementation capacity for districts and schools around evidence and support site-level monitoring and evaluation activities in efforts to implement evidence-based practices.
- It would also make sense for ISBE or an ISBE endorsed group to identify, broadcast and network schools and districts tackling similar work. The networks could also include similar school or districts not in status. The more the people doing the work can share the details of implementation and success, the more likely that evidence-based practices may be applied more broadly. For example, it would be helpful to identify and spotlight those schools that have improved performance for targeted sub-groups and have those schools share their approaches and expertise with schools who have similar issues.
- Require districts, schools and external partners to develop a rationale for any intervention and a theory of action. The theory of action would include:
 - A few evidence-based interventions
 - Rationale for those interventions
 - Measureable goals
 - Timeline
 - Clear roles and responsibilities
 - Analysis of needs, resources, and context
 - Human and social capital
 - Student demographics
 - Fit with needs
 - Progress monitoring plan
 - Sustainability plan
 - Annual review of theory of action

The below represents new feedback, updated/revised feedback from what was initially included in our written feedback to draft #1, and notes referring to feedback included in the initial round of feedback submitted related to draft #1. It is not wholly representative of all content input or all relative content owners at CPS, many of whom are engaged in ISBE-led planning committees specific to their subject areas. Thank you.

Section 1.1, Timely and Meaningful Consultation

Page 5: As part of the College and Career Ready Indicator, CPS recommends defining arts readiness.

Section 2.2, Academic Assessments

Page 10: Benchmark assessments should be identified and requested for other subject areas.

Page 13: CPS agrees that districts should not be on different measurement scales throughout Illinois, and using one common statewide accountability system is critical to identifying which schools are making sufficient progress and which ones need support.

Page 16: CPS agrees that content assessments should be made available in languages other than English. In particular, the State should provide Spanish literacy assessments for students in 3rd-8th grade to ensure outcomes reflect the ability of English Learners. Spanish is the native language of the majority of EL students in Illinois and CPS.

Section 3.1, Accountability System

Pages 19 - 23: ISBE has requested feedback on structure and substance of accountability framework and indicators, including school quality indicators and the College and Career Ready Indicator Framework.

In addition to access to physical activities, CPS recommends that access to the arts and culture be included, for both families and students.

We agree with measures that indicate students are college and career ready upon graduation from high school. We recommend a measure that evaluates the percent of students graduating with a 3+ on AP exams, 4+ on IB exams, credit from a dual credit or dual enrollment course, or a qualifying career credential. In CPS we refer to this as the "Early College and Career Credentials" metric and it has been very useful in identify schools that are preparing students for life beyond high school.

Other measures that we recommend including on-track indicators, attendance and/or reduction

in chronic truancy, and dropout rate. We also believe there is a lot of value in measuring the culture and climate of the school (e.g., the 5Essentials survey).

Beyond graduation rate, one-year dropout rate should be considered as a measure. Graduation rates take several years to measure. Much of what drives the graduation rate happens when the cohort is in its freshman and sophomore years, meaning that changes in practice that will impact graduation may take 3-4 years to manifest themselves into the graduation rate. A 9-12 dropout rate is much more timely and therefore quite actionable.

CPS agrees with ISBE's approach towards an accountability system that is heavily weighted towards growth and other measures of school quality, meaning measures where all schools have the ability to succeed, and which are not simply a proxy for socioeconomic status of the students served.

We also recommend that the accountability system use more continuous variables (such as average scale scores, average growth, percentiles, etc.) over threshold variables (percent proficient). This will ensure the growth of all students is valued, and not only those at specific, arbitrary thresholds.

Page 32: *Any feedback on the growth models presented?* For a high school growth model, we recommend potentially a model that looks at the growth of students across the first three years of high school (with 11th grade SAT as the "posttest"). This will allow the state to identify schools that are receiving students at all levels of academic performance and showing substantial growth.

Page 33, 39: CPS appreciates that ISBE is taking under consideration the reporting requirements for LEAs, in order to minimize duplicative reporting. Feedback previously provided in relation to draft #1.

Page 34: Accountability measures that reflect or are based on traditionally non-tested subjects will have to be determined. This would affect arts instruction, physical education and health/wellness, and world language.

Page 37: *ISBE requests feedback on which model of weighting works best for Illinois? There are two considerations: 1) Weights between academic and school success indicators, and then 2) Weighting of indicators within each of these categories.* We recognize that the state must have a majority of weight on the ESSA-specified measures. We recommend the following for elementary schools: 10% academic achievement; 50% academic growth, 5% EL progress; 10% on-track; 20% attendance/truancy; 5% culture and climate.

For high schools we recommend 10% academic achievement; 40% academic growth; 5% EL proficiency; 10% graduation; 5% on-track; 5% dropout; 10% attendance/truancy; 10% early college and career credentials; 5% culture and climate.

In both cases, we strongly encourage ISBE to 1) not overweight EL proficiency, and 2) capture growth in the EL indicator, rather than proficiency specifically (we recommend examining WIDA's growth model in particular). Unlike other assessments, where proficiency can be the goal for any given student's goal in any given year, English language proficiency happens at certain points in time (i.e., after a few years of instruction), meaning only some students in a given year are truly in a position to reach proficiency. Placing too much weight on this set of students could favor schools with few ELs, or result in adverse incentives; schools may be incentivized to transition ELs before they have reached proficiency of English speaking peers. We believe including this metric at 5-10% of the rating system will encourage an improved focus on this area of instruction, without creating the wrong incentives.

Page 38: ISBE requests feedback on their approach to interim goals (every 3 years)

Page 39: CPS recommends a 4- or 5-tier system of summative ratings. We recommend two low categories to differentiate between schools in need of intensive versus targeted support and intervention. We recommend 2-3 high categories to differentiate between schools who are simply meeting state expectations and those that are exceeding them.

Page 40, regarding n-size: ISBE must consider options for making the ESSA accountability plan subgroup size align to existing statute in ILSC Article 14C.

In addition, as related to EL students, CPS recommends that ISBE:

- Continue counting years of service for English Learners beginning in first grade for the ESSA State Accountability Plan
- Continue assessing language proficiency annually for English Learners beginning in Kindergarten as part of ESSA accountability plan
- Report progress of EL subgroups separately, those active in program and those transitioned beyond 4 years; this would support districts in measuring effectiveness of instruction
- Design ESSA accountability system to report on the progress of former English Learners in grades 3-12

Section 3.2, Identification of Schools

Page 40: IL-EMPOWER is listed as the vehicle for MTSS supports to Comprehensive Support and Improvement Schools. Will districts be required to use a set "menu" of providers? Rather than a narrow list of pre-approved partner organizations, similar to the current SIG Lead Partner Provider list, CPS advocates for LEA flexibility to provide a wide range of evidence-based supports based on an analysis of each school's individual needs. We strongly encourage ISBE to develop an internal mechanism for ensuring providers have the capacity to serve, as well as an ongoing system for their accountability.

Page 41: CPS supports the option of a planning year and encourages the development of specific expectations, outcomes, and readiness indicators that schools should aim to achieve by the beginning of implementation.

Page 44: ISBE requests feedback on identifying schools for targeted support, and exit criteria. Feedback previously submitted in response to draft #1.

Section 3.3, State Support and Improvement for Low-performing Schools

Page 50: ISBE requests feedback on its statewide system of support for low performing schools. Feedback previously submitted in response to draft #1.

Section 4.2, Support for Educators

Page 54: CPS recommends adding Personalized Learning to the list of professional learning opportunities.

Section 4.3, Educator Equity

Section 5.1, Well-rounded and Supportive Education for Students

Page 60: Under the definition of a well-rounded education, music is specifically mentioned, as in the federal legislation. If possible, CPS would encourage the state to include other subject areas that may not have been added, in particular visual and performing arts.

CPS would appreciate if ISBE considered using Title IV, Part A funds to support schools looking to integrate accredited out-of-school learning opportunities (e.g., digital badging) into curriculum and assessment.

Page 68: Requirements for LEA ESSA plans - to require info on library and arts resources, teacher effectiveness and distribution, discipline

Page 69: Uses of Title IV.
Feedback previously submitted in response to draft #1.

Section 5.2, Program-specific Requirements

Page 81 - 82: EL proficiency
ISBE should continue current practice of identifying English Learners when they are enrolled in early childhood education. ISBE should also recommend screening in native language, if not English, as part of the identification process.

Page 85, 100: SEA will collect data from LEAs and other providers of Birth - 5 programs (page 85); increased focus on training early childhood programs on collecting and reporting data on homeless students (page 100)

Page 104 - 107: Increased focus on transition services for Title I D



A Union of Professionals

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

December 27, 2016

Sent via email to essa@isbe.net

Dear Dr. Smith:

On behalf of the 103,000 members of the Illinois Federation of Teachers (IFT) and the Chicago Teachers Union (CTU), we write to comment on the second draft of the Illinois State Board of Education's plan to implement the Every Student Succeeds Act (ESSA).

Fifteen years of No Child Left Behind (NCLB) have demonstrated what does not work: specifically, focusing on accountability as the driver to improve schools, while at the same time Illinois schools lack sufficient and equitable funding and resources for all students to be successful. We have long argued against the thinking that public schools can address the myriad challenges their students bring to school with them without sufficient funding. Research in 2016 from Lafortune, Rothstein and Schanzenbach demonstrates clearly: money matters. Their first-of-its-kind study found, in states undertaking funding reform, changes led to sharp, immediate, and sustained increases in spending in low-income districts, causing increases in student achievement. They conclude that the implied effect of school resources on educational achievement is large, particularly in districts serving students from low-income homes.

In light of these findings, we are concerned that draft two of the ESSA state plan remains stuck in the failed accountability mindset of NCLB and does not address funding insufficiency and inequity in Illinois. ESSA provides the opportunity to shift our focus to the inputs schools need to support all students, and move away from the failed NCLB mindset of narrowed outcomes based on standardized testing. Even the current goals of the Illinois State Board of Education (ISBE) shift from a sole focus on standardized testing to include safe and healthy learning environments, prepared and effective teachers and leaders, graduation rates, and ninth grade on-track indicators. Yet, if Illinois truly wants to achieve these goals, we need to get the inputs right, which includes addressing funding inequities, fixing the Performance Evaluation Reform Act (PERA), avoiding overreliance on accountability as the driver of improvement, and providing schools with resources to comprehensively address safety, stability and security.

We are enclosing comments specific to the second draft of the plan. In addition, we have enclosed the set of jointly held principles of the IFT, the CTU and the Illinois Education Association submitted

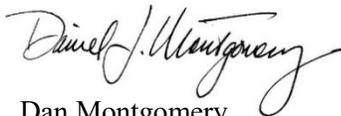
previously. We maintain that an ESSA state plan true to these guiding principles will result in a more equitable and just public education system in Illinois.

In addition to commenting on the plan's content, we also want to comment on the process Illinois is using to obtain stakeholder input. We value and appreciate the discussion that takes place when stakeholder workgroups are convened, both by ISBE and through other venues such as the state P20 Council and the Illinois Balanced Accountability Measure Committee. These stakeholder workgroups play an important role in the development of the state's ESSA plan. However, as we have reviewed both drafts of the Illinois ESSA plan, we have noted an ongoing concern: throughout the plan, ISBE continues to imply that consensus has been reached when it has not (i.e., the Accountability Workgroup, pages 18-20) and the prevalence of hypothetical concepts and examples rather than a concrete plan to comment upon, particularly in Section 3 (Accountability, Support and Improvement for Schools). To address this challenge, we encourage ISBE to do the following:

- Include time for stakeholders to try and reach consensus on key topics;
- If consensus is not possible, we urge ISBE to document where agreement and disagreement exists among stakeholders; and
- Include a public comment period on draft 3 prior to ISBE submitting the plan to the governor.

The IFT and CTU look forward to reviewing the third draft of the state ESSA plan. In draft three, we urge ISBE to address our specific concerns and incorporate the attached guiding principles. Do not allow state decisions about ESSA to keep Illinois stuck in the mindset of NCLB, which has failed to bring about positive change for students, educators, teaching and learning.

Sincerely,



Dan Montgomery
IFT President



Karen GJ Lewis, NBCT
CTU President

Enclosures



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CTU-IFT Comments on Content of Draft Two of the ESSA State Plan

Section 2: Challenging State Academic Standards and Academic Assessments

Section 2.2 Academic Assessments

Assessments under NCLB and Race to the Top were used to rank, sort, and punish schools. These assessments reshaped curricula and, because of widespread and narrowly defined test prep, drastically reduced time for authentic, experiential learning opportunities not easily measured or differentiated. In Chicago, district demands for test preparation led to diminutions of locally determined curricula. Across the state, these assessments also created incentives to focus on students who could move a school or teacher's scores with only a couple of additional correct answers at the expense of deeper learning. These standardized assessments cost districts both time and money, and crowded out spending on more meaningful educational experiences. During the NCLB years, districts shifted resources from other subject areas to math and reading, which significantly impact a school's ability to provide a well-rounded education. District leadership worked to keep class sizes down in state-tested areas, while class sizes have grown in all other non-tested areas. In non-tested areas, teachers and students are still expected to meet all learning standards while carrying a significantly greater load with increasing challenges and frustration. In high school, lack of continuity in statewide testing has created unique challenges and stresses on teachers, students and schools. The state's decision to change in 2014 from the long-time PSAE test (with its ACT components), to high school PARCC for only three years, and now to the SAT has created turmoil and unclear expectations for students and parents, teachers and public schools.

Public education in Illinois must focus on educating the whole child. As long as the state focuses assessment on narrow, standardized reading and math tests, public education will remain stuck in the failed accountability mindset of NCLB. The Illinois plan needs to get assessment right. The state must focus on less testing, and maximize all options ESSA provides for testing relief. Assessments must be rooted in classroom content and practice. Their primary focus must be providing useful feedback to help students and schools improve. Assessments must measure student performance, what students know and can do, rather than the effects of poverty (as we know, standardized test scores strongly correlate with community poverty levels). The continued use of PARCC and SAT for accountability purposes remains a concern for our members, and these professional educators assert that tests be administered only as frequently as absolutely necessary. The National Assessment of Educational Progress (NAEP) provides a roadmap for this minimal administration principle.

Section 3: Accountability, Support and Improvement for Schools

Section 3.1 Accountability System

NCLB's focus on accountability has not improved schools. Given the insufficient and inequitable school funding in our state, this draft plan runs the risk of continuing another failed accountability model with a focus on federal compliance through standardized testing. Instead, Illinois should be truly accountable to students and their families, public schools and communities by providing sufficient and equitable funding statewide to produce better outcomes for all students. Research from Lafortune, Rothstein and Schanzenbach in 2016 supports this concept. It demonstrates clearly the large, implied effect on educational achievement that occurs when states increase school resources, particularly in districts serving students from low-income homes. Since the early 1990s, states that have undertaken funding reform have provided sustained increases in spending in low-income school districts, resulting in increased student achievement.

We recognize that high stakes will be attached to the new accountability system. What is measured matters, with costs impacting our children's education. Given the high stakes nature of ESSA's requirements, Illinois's new accountability system should be based on fair, meaningful and accurate measures. All students have a right to learn and achieve success regardless of where, or under what circumstances, they live. The new accountability system must not hold schools accountable for inequitable and insufficient state inputs, but differentiate where inequity exists. School and district accountability must shift dramatically to address inequity and provide support and resources.

Attainment

As Illinois moves to implement ESSA, there is risk of over-focus on all students' attainment scores in reading and math, to the detriment of a broad and rich curriculum. Regarding ESSA's requirement to include English learners' language proficiency as academic indicators, CTU and IFT urge the state to utilize the flexibility provided by ESSA and delay inclusion of English learners in the accountability system to the greatest extent allowed.

English language acquisition takes longer than ESSA's options allow, raising significant fairness issues. While English learners may acquire social language within a few months, mastering or becoming proficient in academic language takes much longer, as it is more demanding and complex than social language. In addition, proficiency in academic language varies with the academic demands (i.e., academic language is more challenging in high school than in the primary grades; specialized courses of study, such as CTE, require additional and more specific language and vocabulary skills). Since this is the language of standardized tests, rushing to assess English learner proficiency is setting students up for failure. Research on English language learners has been consistent for over thirty years. Both Hakuta et al and Thomas and Collier have done comprehensive work to answer questions about the length of time students need to become proficient in the language to the depth of conceptual knowledge. They have found that the most significant variable in how long it takes to learn English is the amount of formal schooling students received in their first language. Among their findings:

- Those students who were between 8-11 years old and had 2-3 years of native language education took 5-7 years to test at grade level in English;
- Students with little or no formal schooling, who arrived before the age of eight, took 7-10 years to reach grade level norms in English language literacy; and
- Students who were below grade level in native language literacy also took 7-10 years to reach the 50th percentile. Many of these students never reached grade level norms.

These findings hold true regardless of home language, country of origin, and socioeconomic status.

In addition, many English learners come from challenging situations in their home countries, whether due to economic or political circumstances. They have often been on the move for extended periods of time, resulting in little or, in some cases, no school attendance in their native countries or in transitional living situations such as refugee camps. This significantly impacts their home language literacy skills, which in turn impacts their English language acquisition.

The unique challenges that English learners face are also tied to the need for sufficient resources, and the state's responsibility to provide equity to all students in all communities. Thus, CTU and IFT urge caution regarding the use of all attainment measures and especially as it relates to English learners.

We will have additional specific comments on English learner proficiency when we review draft three of the state plan.

Growth Model Methodologies

We caution that measuring growth is a very complex technical and policy decision, with any statistical model having its appropriate uses and limitations. The American Statistical Association (ASA) in 2014 issued a statement urging caution around the use of growth model methodologies (specifically, so-called value-added measures) in high stakes decision-making. The ASA called for such measures to be

- Always accompanied by measures of precision and a discussion of the assumptions and possible limitations of the model;
- Viewed within the context of overall quality improvement;
- Used wisely to focus on improving the quality of education; and
- Viewed as complex statistical models, requiring high-level statistical expertise to develop the models and interpret their results.

Illinois is considering a variety of different growth model methodologies. Because current decisions about growth measures are technical and political, as well as high stakes, it is important to provide appropriate time for study. Illinois must take the needed time and exercise due diligence in selecting any growth model as part of the state accountability system. To meet the ESSA requirement of meaningfully differentiating supports and resources to schools, the selected growth model methodology must focus on accounting for inputs, including existing inequity in our state. Growth measures must be fair to schools and reflect as accurately as possible what students know and can do.

At this time, CTU and IFT feel strongly that the state and education stakeholders do not have enough information on different growth models to make an informed decision. The ISBE Technical Steering Committee has analyzed very limited Illinois data sets (i.e., fifth grade only, two years of PARCC data) and raised many questions and concerns that require further analysis. What has been done indicates there are issues with all growth models, meriting further analysis and understanding before a decision is reached. This process over the last three months has been rushed, especially when compared to past Illinois timelines for selecting a value table growth model, which was used only for information purposes.

We also urge ISBE to exclude growth measures for high schools and English learners from the accountability system. Our members are concerned that there will be additional class time lost to testing and test preparation; increased pressure on English learners and their teachers to demonstrate

growth inconsistent with the research on English language acquisition; increased testing at the high school level (i.e., adding a test such as PSAT); lack of student buy-in to standardized testing at the high school level; technical concerns related to using eighth grade PARCC scores in a high school growth calculation (i.e., number of years between eighth and eleventh grade data points, student data tracking and attribution issues); and potential misuse of growth data.

School Quality Indicators

The IFT and CTU urge that only the following indicators be used to measure student success and school quality. Our members have experienced, and research supports, that these measures of inputs are integral to a successful, rich school experience. They also support attainment of ISBE's long-term goals.

1. Inclusivity of a broad and rich curriculum (containing access to arts and enrichment coursework, physical activities, library, advanced coursework such as dual credit, AP, IB, and career and technical education). This overall, inclusive indicator focuses on the various inputs that create a well-rounded educational experience.
2. Access to social and academic services and supports. This is an important resource indicator to demonstrate the ratios of teachers, counselors, social service providers, nurses, paraprofessionals, and specialists to students.
3. Percentage of 9th grade students on track/high school readiness. This indicator helps both teachers and schools implement early high school interventions and support to students.
4. Chronic absenteeism. Research shows this is an indicator of poverty and academic risk, and a good "trigger" for identifying students in need of additional supports. The CTU and IFT believe this indicator should be defined as a student's excused and unexcused absences from school equaling at least 10% of the school year, or 18 school days; and should take into consideration students who are chronically absent for reasons, such as a serious health condition.
5. Student and teacher climate surveys. Survey results can provide for student and teacher voice within the accountability system.

The CTU and IFT oppose inclusion of a new college and career ready indicator in the ESSA accountability system. This indicator is not ready to be part of a high stakes accountability system and needs further research and statewide consensus. Further, many aspects being considered in the definition of college and career readiness are subsumed in other academic and school quality indicators.

We believe our recommended school quality indicators will help achieve ISBE's stated long-term goals for school safety and quality.

Weighting

To counter overuse and misuse of standardized testing, and to prioritize learning, inputs, and resources, school quality indicators should be weighted to the greatest extent allowable under ESSA. Further, ISBE should examine ways to nest multiple measures within each of the indicators and examine ways to focus on growth within multiple measures.

The weights for each measure which ISBE identifies must make sense and align to its declared goals, because these weights and measures will drive educators' decisions across the state. Unfortunately, indicators and weights in the current draft plan continue to emphasize proficiency over growth using narrow measures. Further, they do not fully account for all of ISBE's stated goals and do not account for inequitable and insufficient school funding. In setting weights, CTU and IFT strongly urge ISBE to undertake a similar process to CORE districts in California. In these districts, decisions about weighting were made collectively and collaboratively after specific measures were identified and clearly defined

through a process based on predictive research, values, and measure-readiness. We welcome being part of that weighting discussion once there is a firm understanding of the measures to be included in the accountability system.

Single Summative Score

While the federal regulations require states to meaningfully differentiate and generate a single summative score, ISBE should not make this score public. This type of public shaming was detrimental to public schools under NCLB. ESSA is an opportunity to stop labeling, blaming, shaming and instituting top-down punitive measures on schools, especially schools serving students who live in high-poverty communities. Providing information on each specific indicator has the potential to provide more useful information to the public than a single summative score. ISBE's plan should end the rank-and-sort mindset of NCLB, and use the new accountability system to focus on providing equitable and sufficient school funding statewide.

Section 3.2 Identification of Schools

3.2(A)(i)

Given the description in this draft of the state plan, it is impossible to tell what IL-EMPOWER will look like in practice. Since 2007, when Illinois first mandated Response to Intervention (RTI), now called the multi-tiered system of support (MTSS), through special education administrative rule, IFT had indicated support for this process when well resourced, funded and implemented with fidelity. Now, within the context of the ESSA state plan, CTU and IFT oppose the ISBE proposal to use the concept of MTSS as the foundation for the state's general school improvement initiative for two reasons:

1. There has been, and continues to be, a lack of funding to support statewide implementation. Adequate and sustainable funding is the foundation for any MTSS program to be done well. Since 2007, implementation has been uneven, the state has not funded this required initiative, and resources to support district and school implementation have not been provided.
2. This plan takes the use of MTSS far beyond what research demonstrates such a process can achieve. MTSS adds behavioral and socio-emotional components to academic interventions, which are important to address first, so that students can learn academic content. However, it is not clear how IL-EMPOWER will address either aspect in a systemic, statewide way as the foundation of school improvement efforts.

IFT and CTU will continue to oppose using MTSS in its current form unless that plan is fully funded and resourced. Instead, we believe ISBE can best serve schools as a clearinghouse to facilitate research-supported ideas and strategies, rather than focus scarce funds to require MTSS as the basis for the statewide system of support.

Whether called RTI or MTSS, the state has not sufficiently or equitably funded implementation to establish statewide MTSS capacity to meet the established purposes of an MTSS process. We have serious concerns about the implementation of RTI, now MTSS, statewide. In too many districts, RTI/MTSS processes did not focus on improved student learning; instead, they devolved into increased testing, which has not been useful to teachers or students. In too many instances, it has been used to deny students access to special education services. Our members have also experienced increased mandates and paperwork which reduce teaching time. If well implemented and funded, MTSS could provide quality early intervention services to students most in need of additional support. However, this process only works if used appropriately and properly funded and implemented. Without proper funding, we cannot support MTSS.

CTU and IFT appreciate the state plan acknowledges that school improvement happens over years, and the inclusion of a planning year is helpful. School audits and collaborative local planning can be helpful as well, if teachers unions and families have authentic involvement in the audit and planning process. However, until Illinois undertakes broader efforts to address instability and unpredictability in our most struggling schools, planning only goes so far. Schools need continuity and stability of funding, leadership, teaching staff, safe and supportive teaching and learning conditions, and meaningful performance evaluation systems. There is a need for continuity and stability, and it is not clear how IL-EMPOWER, or the ESSA state plan, will address these issues.

The plan for school improvement must acknowledge this fact as well: Many of the challenges schools face in educating all students are not, by their nature, school problems. They are broader economic problems. There are larger societal problems that must be recognized and accounted for in the ESSA plan. The ESSA plan concepts of “greatest need,” as well as readiness and commitment to implement, have the potential to create a competitive environment with ESSA school improvement funds. This is not in the spirit of ESSA.

Section 3.3(A) Allocation of School Improvement Resources

Regarding the funding of school improvement, ISBE should avoid three pitfalls of School Improvement Grants 1003(g) (SIG): underfunding, the SIG grants’ competitive nature, and state requirements for vendor services. ESSA requires states to identify the so-called bottom 5 percent of schools so they can receive comprehensive support. In Illinois for 2017-2018 this means about \$48.6 million for approximately 240 schools. However, all schools need help to different degrees, and it is unclear how the state plan will overcome funding insufficiencies to address the real challenges these schools face, or what happens when federal funds go away. It is also not clear how other schools, beyond these 240, will receive the funding they need to improve. Illinois must recognize the crisis our state now faces regarding students living in poverty, which goes well beyond the so-called bottom 5 percent of schools. In 43 percent of Illinois school districts in 2015, more than half of the students came from low-income homes; ten years earlier, only 13 percent of districts fell into this category. Critically, Illinois must recognize ESSA school improvement funds are limited, and it will require significant time, additional funding and more effort to help all students living in poverty achieve to their highest potential.

CTU and IFT oppose ISBE’s intention to design and implement a rigorous review and approval process for external providers that will become part of statewide MTSS (IL-EMPOWER). We are concerned that ISBE does not have the internal capacity for MTSS to be successful. As a result of our members’ experience with poor RTI implementation, and the use of external providers in the role of Lead Partners to oversee SIG grants, we must oppose this aspect of the plan. Further, there is no qualitative or quantitative data on the effectiveness of the use of external Lead Partners in SIG grants. It is troubling the state would undertake a similar, untested concept for implementation of its proposal for statewide MTSS, rather than significantly build ISBE staffing levels and capacity.

Educators have spent many hours working on and deliberating over the Illinois Balanced Accountability Measures Quality Framework and Rubric. As such, it is important to ensure that there is a clear role for both when determining differentiation and needed resources and supports to schools.

Section 3.3(B) Evidence-Based Interventions

Illinois’s ESSA plan needs to identify and then provide additional supports and resources to ensure effective development and implementation of school support and improvement plans. Illinois must

provide differentiated supports, based on evidence-based practices determined locally by practitioners, families, and community members who best know the community and school context.

CTU and IFT urge ISBE to ensure authentic, meaningful local union, parent and community voice in school improvement efforts. The people who know their students best must have this voice in deciding what will work in their schools. ISBE's role should be to contribute to, curate, annotate, and update a list of evidence-based strategies to help guide local decision-making on school improvement efforts.

Section 3.3(C) More Rigorous Interventions

CTU and IFT are concerned that to date ISBE has not included any detail on what "more rigorous interventions" would look like in Illinois. We know from our members, as well as outcomes based even on Illinois's current, limited and flawed measures, that practices such as state takeover, so-called school turnaround, use of outside vendors, and other experimentation have not addressed the larger economic and societal instabilities in communities where these schools exist. We strongly urge ISBE to convene discussions of union leadership, school and district leadership, and parents in these communities to identify what will be effective. We believe that local, collaboratively developed, well-resourced and funded models are the key to more rigorous interventions. We support the community school concept where the school and partners from across the community come together to educate and support students by effectively integrating culturally relevant curriculum; parent, student, and community engagement; wraparound supports; restorative justice; and alignment between all school community constituencies and leaders. Community resources must be strategically organized to support student success and integrating academics, services, supports and opportunities.

Section 4: Supporting Excellent Educators

Section 4.1(A) Educator Development, Retention and Advancement Systems

See CTU and IFT comments above in Section 3.2(A)(i) regarding IL-EMPOWER as the foundation of a statewide system of supports.

We believe professional development is a continuous process of individual and collective examination and improvement of practice that must be educator-focused and educator-directed. It must empower individual educators and communities of educators to make complex decisions; to identify and solve problems; and to connect theory, practice, and student outcomes. Professional development must enable teachers to offer students the learning opportunities that will prepare them to successfully assume adult responsibilities for citizenship and work. Professional development must deepen and broaden educators' knowledge of content and provide a strong foundation in the pedagogy of particular disciplines. It must provide knowledge about the teaching and learning processes and be rooted in and reflect the best available research. It must be intellectually engaging and address the complexity of teaching. In light of new ESSA requirements, professional development must also support teachers' work with English language learners.

The ESSA plan should urge districts to ensure union involvement in planning and delivering professional development and to include sufficient time, support, and resources for teachers to master new content and pedagogy and to integrate this knowledge and skill into their practice. Professional development must be job-embedded and site specific.

Illinois's Title II funds will be reduced by nearly one-third over the next seven years, and the ESSA plan is unclear whether and how professional development will be properly resourced by the state to provide

professional development programs, such as support for instruction of English learners and National Board Certification. Currently, our members' school districts have little to no professional development dollars to support good, differentiated professional development for all staff; to address staff needs regarding instruction of English learners, students with disabilities, and other special student populations; and to send staff members to conferences in their academic areas. This again highlights the need for adequate and equitable school funding in Illinois.

Section 4.2(B) Skills to Address Specific Learning Needs

We are concerned that, in Section 4.2(B), ISBE appears to rely on many initiatives that are incomplete, in development, and unavailable statewide. Without comprehensive and sufficient school funding, including sufficient staffing of the state education agency, these initiatives will hold only promise. The ESSA plan should not include these initiatives if they are not available to all school districts.

Section 4.3(A) Definitions

Illinois's proposed definitions, tied to current teacher evaluation rating systems, are troubling. As the University of Chicago research on the Chicago Public Schools PERA evaluation system demonstrates, there is essentially no change in the number of teachers rated unsatisfactory under PERA, compared to pre-PERA; changes have mostly occurred in the top two rating categories (Sporte and Jiang 2016). There are statistically insignificant but, as defined in the ESSA plan, significantly consequential differences between ratings categories, especially in districts where the ratings are based on a point system with arbitrary cut scores which do not match the real differences in the measurement instruments. In Chicago, studies have shown that observation ratings are significantly lower for teachers in low-income schools, Black teachers, and male teachers, indicating possible bias (Jiang and Sporte 2016).

Section 4.3(B) Root Cause Analysis

IFT and CTU support policies that facilitate increasing the number of highly effective teachers with cultural and linguistic competencies. One of the consequences of the high stakes testing and performance evaluation systems of NCLB and Race to the Top was the significant decline of teachers of color across the state, especially in Chicago. In Chicago, Black teachers made up 39.4 percent of the teacher force in 2002, but their number has declined to 21.8 percent in 2016. Statewide, the percentage of Black teachers declined from 10.2 percent in 2002 to 6 percent in 2016, while the percentage of Caucasian teachers remained relatively steady at approximately 84 percent.

One way to reverse this trend is for Illinois to further support and expand access to the Grow Your Own Teacher (GYO) initiative. This initiative is a partnership between colleges of education, public schools, community colleges, and community-based organizations to recruit and develop a pipeline of community-based teachers who come from the community in which they will one day teach. It recruits diverse candidates and provides teachers who act as role models for minority children. It benefits Caucasian children by exposing them to teachers of other races and dispelling negative stereotypes. It also provides communities, especially low-income urban and rural communities, with high-quality educators, who will continue their education by pursuing a master's degree, and who are invested in their communities. Currently, this initiative serves teacher education candidates in sixteen high-need communities in the state, including eight in Chicago and one each in Alton, East St. Louis, Peoria, the Quad Cities, Rockford, Springfield, and the South Suburbs. The GYO initiative, if fully funded and expanded statewide, can play a key role in creating a pipeline of highly effective teachers and addressing the problems identified in the Illinois Equity Plan.

Section 5: Supporting All Students

Section 5.1(D)

Virtual schools present unique governance and accountability challenges to the state and to local districts. The key to any virtual education lies in the student's face to face interaction with teachers and other students, with virtual education serving as an instructional tool, not an instructional replacement. Our members are concerned about the impact on both the academic and social-emotional aspects of a student's education, including for students with disabilities who are enrolled in virtual schools.

Virtual schools should not be a replacement for any brick-and-mortar school, including a struggling school, and students should be afforded all the opportunities of a high-quality education program with access to the best tools and resources. Teacher input must be integral to digital learning policies and procedures, including design, review and approval. States should strenuously regulate preK–12 providers to ensure that funds are not being taken from the communities they are meant to serve.

Our members have found the current Illinois Virtual School can be effective for students in certain situations (i.e., student illness, making up missed work, enrichment not offered at a local school) within existing statewide parameters and protections. Further, the existing Illinois Virtual School only works well if used to supplement local school offerings, using qualified classroom teachers.

Research in 2016 from the University of Chicago Consortium for School Research found that the efficacy of the Illinois Virtual School's online credit recovery program is lacking. This randomized control study found that students taking Algebra credit recovery courses online found the subject more difficult and had lower credit recovery rates and assessment scores (Taylor et al 2016). In addition, there is a growing body of research about the potentially negative impacts of screen learning, connected to users' reading preferences, comprehension levels, and memory, as well as the role paper serves in learning, as it provides spatio-temporal markers not found in screen learning (Myrberg and Wiberg 2015, Lauterman and Ackerman 2014, Mangen et al 2013, Ackerman and Lauterman 2012).

Given these red flags, state law and district policy should ensure accountability and transparency for digital education providers so the public has access to information about revenue and expenditures, efficacy on virtual learning, student demographics, student achievement and staff qualifications.



Our ESSA Guiding Principles Document

ESSA is a real opportunity for Illinois. The law is an opportunity to remedy more than fifteen years of the rank, sort, and punish mentality which was part of No Child Left Behind and Race to the Top. ESSA dramatically reduces the power of the U.S. Department of Education and gives states authority to design and implement new systems, including assessment, accountability and intervention. The law is an opportunity to address the long history of inequality in Illinois' schools, to acknowledge and support the needs of the state's rapidly changing student demographics, and to look at the inputs that make schools thrive. Illinois has a responsibility to focus on inputs: adequate and equitable funding, early childhood learning, broad and rich curricula, safe environments, wraparound services, timely and embedded professional learning for educators, and time to focus on learning rather than testing.

As Illinois moves to implement ESSA, our Unions will continue to be engaged in the process as advocates for students, educators and education support professionals. We will continue to collaborate and partner with state legislators, parents, school boards, superintendents, community partners and bargaining teams to make sure implementation goes smoothly and that educators maintain a strong voice in the process.

Our Guiding Principles on Evidence-based Initiatives that Work

School and district accountability must shift dramatically to address inequity and provide support and resources, so school and community members can collaboratively identify evidence-based initiatives that work for them locally, rather than face blame and punishment. All students have a right to learn and achieve academic success regardless of where, or under what circumstances, they live. Too often, children from disadvantaged areas, whether in urban centers or rural communities, lack the additional supports promoting learning which other children have at home and in their communities. ESSA opens the door to providing additional supports and resources to those students, based on evidence-based practices determined locally by practitioners, families, and community members who best know the community and school context. ESSA requires authentic practitioner, student, and family member voice in these local decisions.

All schools can be successful when the following factors are in place:

- Sufficient and equitable funding and resources provided to students in their classrooms, not to vendors and consultants,
- A broad, rich, and meaningful curriculum,

- Wraparound services delivered through the community schools model that clearly addresses the needs of students, and
- Appropriate time for school staff to analyze, plan, implement, and re-assess for change with a focus on fostering relationships within the school building and school community.

Our Guiding Principles for New Accountability

The state's ESSA plan for an accountability system should be based on fair, meaningful accountability and differentiated supports with a commitment to resource equity and sufficiency. To that end, and on behalf of our members, we put forward the guiding principles below. We look forward to further conversations to craft an accountability system using measures, weights, goals and aggregation of measures which aligns with these principles.

Principle 1: The new accountability system must be based on multiple indicators tied to state and district resource accountability. It must reflect each school's efforts to address the factors that put students at risk, including the number of children in the school who live in poverty, are learning English, and come to the school with other special needs.

Principle 2: Academic and school quality indicators must not be weighted so as to disadvantage schools due to any socio-economic factor or disability that a child brings to the school.

Principle 3: Effective implementation of a new accountability system must include time for districts, schools and educators to adjust to different accountability expectations, as well as clear, strong, consistent communication with the public, educators, stakeholders, elected officials and parents on the uses and limitations of the new system.

Principle 4: The Illinois College and Career Ready Indicator Framework must account for a fuller picture of college and career readiness, so all children are treated fairly within the definition of what it means to leave our K-12 system ready to succeed in their chosen pathway. It must lift up all students, particularly those not planning on attending college upon graduation.

Principle 5: Schools must not be defined by a single score derived from the multiple measures included in the state's new accountability system. The work done in schools is simply too complex to be captured by a single score, letter grade or other designation.

Our Guiding Principles on Assessment

Assessments under No Child Left Behind and Race to the Top were used to rank, sort, and punish schools. These assessments reshaped curricula and drastically reduced time available for authentic, experiential learning opportunities not easily measured or differentiated. We believe assessments should be subject to the following principles:

Principle 1: Assessments must be rooted in classroom content and best practices. They must measure what students know and can do, rather than reflect the effects of poverty.

Principle 2: Assessments must not be used to rank, sort, and punish students and schools but instead be used as an opportunity to demonstrate learning and provide feedback. Assessments used for accountability must support authentic learning opportunities that inform instruction.

Principle 3: Assessments related to accountability must be limited in length and frequency by setting a limit on the aggregate amount of instructional time devoted to accountability assessments.

Principle 4: Assessments used for accountability must not require test-preparation activities.

Principle 5: As long as students are subjected to over-testing through developmentally and academically inappropriate standardized tests that are unaligned to curricula and as long as teachers do not have time for meaningful professional development, parents must have the right to opt their children out of state assessments.

Our Guiding Principles on Teacher Evaluation

Illinois' current system of teacher evaluation has created systemic pressures on local education agencies across the state. In general, the requirements are cumbersome, time-consuming, and do not support the supposition that the purpose of teacher evaluation is to support instructional practice. Neither teachers nor evaluators have received sufficient training. We believe teacher evaluation should be subject to the following principles:

Principle 1: Teacher evaluation processes must be fair and free from bias, regardless of teaching context.

Principle 2: Teacher evaluation must ensure teachers receive meaningful feedback that results in professional growth opportunities.

Principle 3: Value-added modeling (VAM) is neither valid nor reliable and must not be used for any part of a teacher evaluation system.

Principle 4: Teacher evaluation systems must not include unreliable student growth measures, but rather be based on measures teachers trust and use processes which minimize the time and stress associated with evaluation.

Tony Smith, State Superintendent of Education

Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Forest Park School District #91 for the past 7+ years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

We would like to share with you the impactful results PBIS has had in our school and district overall. Since our district started the implementation of PBIS, we have seen a decrease of ODR's and suspensions throughout the district as a whole. We have a social worker in each building and an established PBIS team to guide the school to success, with parental involvement. Our district has established community involvement and partnered with local businesses so that PBIS is community wide. I would also like to point out since we implemented PBIS over 7 years ago, we have shown an increases in academic success and more importantly an Increase in students with IEPs accessing least restrictive environment. The list could go on with the amount of great things that PBIS has done for our district.

The supports that we have received have been amazing. Our PBIS team members have had training on developing systems and utilizing data within a multi-tiered system (Tier 1, tier 2, etc.) as well as training on evidence based practices such as, Check-In/Check-Out, Functional Behavior Assessment and Behavior Intervention Plans, Wraparound, and RENEW. Anytime we have a question or need assistance, technical assistance has been provided. I find it especially amazing that I can send an email or call real quick and I get a live person to talk to that can guide me in the correct direction immediately. I cannot speak enough about the impact that this has had on our district.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. Therefore I request that Illinois's plan includes the following:

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:

- o Trauma-Informed Environments
- o Positive Behavior Interventions and Supports (PBIS)
- o Classroom Management
- o Anti-Bullying Programming
- o Restorative Practices
- o Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
- o Check-In, Check-Out (CICO)
- o Family Engagement
- o Education Environment Practices
- o Person-centered Planning Practices (wraparound, Care Coordination, etc.)
- o School-Community Partnerships

Sincerely,

Mrs. Julie Hantson
Assistant Director of Student Services - District 91
PBIS External Coach

jhantson@forestparkschools.org

708-366-5742



Dakota Community Unit District 201

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PK-6 Principal
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December 15, 2016

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Dakota CUSD #201 for the past two years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I've been part of implementing PBIS in two different school districts and can attest to the profound impact it has on the school culture. The learning environment improves dramatically for all students. We've also witnessed our most behaviorally challenged students functioning in the regular classroom setting instead of being placed in much more restrictive alternative school type environments.

We've utilized Midwest PBIS's technical assistance this year and are in the process of establishing Tier 1 supports in our district. The training has been phenomenal and we're already experiencing improvements. I would strongly encourage ISBE to partner with Midwest PBIS Network.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture.

Therefore I request that Illinois's plan includes the following:

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
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 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

Jeff Milburn, Principal
Dakota CUSD #201



Dakota Community Unit District 201

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JEFF MILBURN
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December 15, 2016

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Dakota Community Unit District #201 for the past two years. This year we have been implementing and training the Jr./Sr. High School where we are still in the infancy of the implementation process. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

Providing a supportive social emotional environment helps all students succeed and flourish in the school system. With a growing population of socio-economically disadvantaged students, Dakota like many schools need to improve the support system for all students, especially those in that socio-economical group. Midwest PBIS, provides the support for our system to continue the implementation, which greatly impacts the students who need it the most.

Midwest PBIS provides training and support for the school by:

- Training on developing systems and utilizing data within a multi-tiered system (Tier 1, tier 2, etc.)
- Training on evidence based practices such as, Check-in./Check-out, Functional Behavior Assessment and Behavior intervention Plans, , wraparound and RENEW.
- Receiving technical assistance and opportunities to network with other schools through Coaches Networking meetings
- Access and support to Fidelity measures through the PBIS Assessments
- Support for utilizing School-Wide Information Systems (SWIS)

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. Therefore I request that Illinois's plan includes the following:

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (Wrap-around, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

Eric Rankin, Principal
Dakota Jr./Sr. High School



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December 14, 2016

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Dakota CUSD #201 for the past two years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I've been part of implementing PBIS in three different school districts and can attest to the profound impact it has on the school culture. The learning environment improves dramatically for all students, with our lower socio-economic students experiencing the greatest benefit. We've also witnessed our most behaviorally challenged students functioning in the regular classroom setting instead of being placed in much more restrictive alternative school type environments.

We've utilized Midwest PBIS's technical assistance this year and are in the process of establishing an effective leadership team. The training has been phenomenal and we're already experiencing improvements. We plan on utilizing Midwest PBIS moving forward.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture.

Therefore I request that Illinois's plan includes the following:

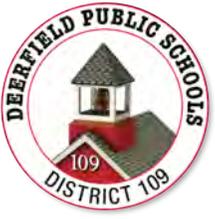
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- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
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 - School-Community Partnerships

Sincerely,



Bob Prusator, Superintendent
Dakota CUSD #201



Office of the Superintendent of Schools

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<http://dps109supt.edublogs.org>

Engage, Inspire, Empower

District 109 students will excel and contribute when they have the knowledge and skills to be:

- *Lifelong, self-directed learners*
- *Critical and creative thinkers*
- *Effective communicators*
- *Collaborative team members*
- *Respectful and responsible members of society*

December 8, 2016

Via: Email to: ESSA@isbe.net

To: Illinois State Board of Education

From: Michael Lubelfeld, Ed.D. Superintendent of Schools

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.

Via email, subject: PBIS in ESSA

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dec 13, 2016

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Huntley High School (CSD 158), for the past 9 years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I've been a member of the PBIS team at my school for the last 7 years. Since then our numbers of office referrals and common misbehaviors (such as tardies and unverified absences) has greatly decreased, even though our enrollment continues to increase. With this, students gain academic time and participate in positive experiences at school.

In addition, I attribute the positive climate in our school to the promotion of our PBIS big 3: "The Raider Way: Be Respectful, Be Responsible and Be Involved." There is not a student or faculty member in our school who cannot name these three values we hold dear.

All of this is a direct result of the support the PBIS Illinois team (now Midwest PBIS Network) invested in our early efforts. They helped us to establish Tier I supports through lessons, acknowledgements, data keeping with (SWIS) and educating through advertisement of our big 3. Beyond that we were able to establish Tier II supports (check-in, check-out, mentoring, and groups) through the wise guidance of PBIS staff. Currently, we are part of a Tier 3 RENEW study for students most at risk.

Each year, we go through a thorough audit through the Midwest PBIS Network to make sure that we are still headed true North. This helps us to highlight areas of both success and weakness in order to better serve our students.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. Therefore I request that Illinois's plan includes the following:

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework

2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

Laura Jenkins

Instructional Coach
PBIS Tier 1 Coach
Math Team Coach
Huntley High School

13719 Harmony Road
Huntley, IL 60142
PH: (847) 659-6600 FAX: (847) 659-6628
www.district158.org/hhs/index.html



Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Huntley Consolidated School District #158 for the past 9 years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I have had the opportunity to work with the PBIS network both as the Illinois PBIS Network and now the Midwest PBIS network, and have received extensive training and support through this program for our school. Huntley High School has always been a "good school," but we have seen amazing growth in our programs and in the development of our systems through the use of PBIS and our motto of "The Raider Way: Be Respectful, Be Responsible, and Be Involved."

The PBIS program here at Huntley has allowed our referrals to decrease in number and the quantity of students receiving behavioral consequences. In 2012-2013 school year, only 70% of our students did not have referrals to the deans' office, but by this previous 2015-2016 school year, that number was up to over 83%. This had made a tremendous difference to our administration and our systems especially as our enrollment has grown so much leaving the administration time to deal with other situations.

The behavior and social/emotional programs at HHS have only had the opportunity to grow because of the supports of the PBIS team and the internal supports that this program has developed. We now directly teach the appropriate behaviors to students with introductory lessons and lessons throughout the school year, and most importantly we approach our students and issues in the school in a different way--by looking at how we can help change the behavior rather than immediately consequence which falls in line with other ISBE agendas to reduce suspensions and expulsions for students and provide restorative justice practices in the school.

Beyond the numbers PBIS has made a difference on the social side of the school environment even just looking at the teachers and administration behavior. We now have a common language to use, a common goal of supporting students, and most importantly programs and interventions in place to give the student the help that they need within our school environment directly.

The training that the PBIS network has provided has given our district the support and access to the interventions to help the students in the most need. The PBIS network has given countless members of our staff training, worked with our administration and PBIS team to develop interventions that work for our school yet are using evidence based practices, and also have helped us work with other schools in the area to get even more connections and resources. Without their support in our early years of putting PBIS in place we would not have the programs like we do today. Through PBIS we have gained access to interventions such as RENEW through the University of New Hampshire and the amazing opportunity to be a part of the research that they are collecting along the way.

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 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

A handwritten signature in black ink that reads 'Anne Sharkey'. The signature is written in a cursive, flowing style.

Anne Sharkey

Huntley High School
Huntley Consolidated School District
AP Social Studies Teacher
PBIS Internal Coach

asharkey@district158.org

To: Dr. Tony Smith, State Superintendent of Education

From: Acasia Wilson Feinberg, Executive Director, E4E-Chicago

Subject: Comments on ISBE Draft ESSA Plan

Date: December 27, 2016

Dear Dr. Smith:

As a teacher-led organization, we strongly urge you to consider the voice of teachers in developing Illinois' ESSA plan. Teachers are not only a required stakeholder for input gathering under the law, their professional expertise and classroom perspectives will be invaluable as our state designs the measures, programs and supports that have the potential to positively impact their classrooms and careers for many years to come.

Educators for Excellence-Chicago's more than 3,200 members are part of a quickly growing national network of over 24,000 educators. E4E members learn about education policy and research, network with like-minded peers and policymakers, and take action by advocating for teacher-created policies that both lift student achievement and the teaching profession.

Over the last two years, E4E-Chicago members have come together to identify local issues, review best practices, conduct research, and gather feedback, which ultimately resulted in two teacher-authored policy papers and additional recommendations from teacher working groups. Their recommendations on how to improve [teacher evaluations \(2016\)](#), teacher diversity (2016), and professional development (2015) inform our comments on the second draft ESSA plan for the State of Illinois.

First, we focus on Section 4.2, which outlines how the SEA will use Title II, Part A funds to increase the quality and effectiveness of teachers. Specifically, we recommend better alignment between teacher evaluation data and targeted professional development. The bolded text shows our recommendations.

(Section 4.2) Support for Educators

- (p. 53) This professional learning **should be aligned to teacher evaluation data** and will improve the quality and effectiveness of educators and improve student academic achievement.
- (p. 53) ISBE will provide guidance to districts on the type of professional learning that is most likely to be effective, aligned to adult learning best practice, is evidence-based **and coordinated**

with teacher evaluation data, and has been demonstrated to be effective in developing knowledge and improving practice and/or outcomes for students.

We also recommend that the following suggestions be incorporated into the plan to more strongly link teacher evaluations with appropriate and targeted professional development. Aligning these two components of teacher development in the state plan will ensure that teachers are, in fact, supported to improve in the domains they need the most:

- ISBE should mandate that districts align their definition of "professional development" with the domains and indicators in the teacher evaluation system.
- ISBE should require districts to analyze the degree to which the professional development offered is aligned with teacher evaluation results and the domains in which teachers in these schools need support.

Additionally, ESSA provides opportunities for state Chiefs to use Title II funding in innovative ways to help improve teacher and leader quality and ultimately increase student success. As such, our members recommend Illinois to use optional funds for competitive grants that promote teacher leadership.

- (p. 52-53) ISBE should opt to reserve the three percent of overall funds for statewide activities that would incentivize districts, via competitive grants, to implement innovative teacher leader or hybrid roles that utilize distributed leadership models.

Lastly, with the understanding that the new federal regulations will require the state to incorporate components of the [2015 Illinois Equity Plan](#) into ESSA, our members recommend that the state use this as an opportunity to strengthen the supports and strategies available to districts that are working to reduce or eliminate equity gaps.

- (Section 4.3) Educator Equity
 - (p. 56-57) ISBE should further elaborate on the strategies to eliminate identified equity gaps that are currently included in the Illinois Equity Plan (p. 29-30). The bolded text shows our recommendations to the Illinois Equity Plan, which we believe should be incorporated in ESSA:
 - Utilize current ISBE communications strategies to ensure that districts are aware of how they can use Title II funds to support professional development including but not limited to: recruitment and retention programming (e.g., induction and

mentoring programs), professional development **for educators and administrators** (e.g., pedagogical, content, **coaching best practices for administrators, aligned to evaluation and student data**, and the establishment of professional learning communities) and programming that would assist teachers in supporting the academic and social emotional growth of their charges.

- Award to LEAs grants for a three year period that require: the development of recruitment and retention programming (e.g., induction and mentoring, PLCs, other professional development), the use of teacher leaders as instructional leaders **or in other leadership or hybrid roles** within the school, and programming that capitalizes on the skills of parents and community members and supports family engagement.
- (p. 56-57) ISBE should include clear timelines, interim targets, and goals that outline by how much, and by when, Illinois will narrow gaps in access to effective teachers and eliminate differences in the rates of ineffective, inexperienced, and out-of-field teachers.
- (Section 5.1, G) Other State-Identified Strategies
 - (p. 68) ISBE should provide guidelines and baseline requirements for district plans regarding how LEAs will identify and address disparities in teacher distribution. **These guidelines and requirements should emphasize the need for administrators and districts to create plans and strategies focused on improving the performance of ineffective teachers rather than on redistribution.**
 - (p. 68) ISBE should provide best practices to support LEAs to ensure that every child is taught by a highly effective teacher, **including an emphasis on how to train and support administrators to better identify, coach, and support ineffective teachers.**

Thank you for partnership and we hope you will continue to encourage teachers to give input in the Illinois State ESSA plan.

Sincerely,

Acasia Wilson Feinberg

Educators for Excellence – Chicago

--

Acasia Wilson Feinberg | Executive Director
Educators 4 Excellence-Chicago
cell: [480.220.5640](tel:480.220.5640) office: [312.546.6674](tel:312.546.6674)
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E4E.org

Educators  Excellence

Illinois Early Learning Council

Governor's Office
of Early Childhood
Development



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Chicago, IL 60601

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We are pleased to transmit to you the Early Learning Council's recommendations relating to Illinois' Every Student Succeeds Act (ESSA) plan.

These recommendations are the result of a process that engaged a wide range of stakeholders within the early childhood community. On September 21, the Early Learning Council's co-chairs solicited participation in four Early Learning Council work groups to draft recommendations on key topics in the ISBE plan. (A full copy of their email request is attached.) The work groups included:

- Standards, Assessments, Accountability, and Supports (focused on Sections 2 and 3 of ISBE's draft);
- Supporting Excellent Educators (Section 4);
- Supporting All Students (Section 5); and
- Title I and Title IV discretionary spending.

The recommendations that follow were developed by the four work groups, presented to the full Early Learning Council, and then approved by the Early Learning Council's Executive Committee. They have also been shared with the P-20 Council.

ESSA presents an opportunity for Illinois to build a cohesive educational system from birth through post-secondary. A well-rounded education includes increasing access to high quality early childhood programming as a viable investment for schools in reducing the opportunity gap. Schools are a central hub in communities and are ideally situated to bring families and resources together. Our recommendations emphasize the importance of the following ideas:

- Aligning early childhood education programs and the K-12 system, with reciprocity of learning in a community focused on creating a more seamless continuum of education;
- Expanding quality early childhood education programming;
- Investing in adequate resources and support personnel to meet the needs of the whole child in every school;
- Implementing culturally and linguistically responsive practices throughout the P – 12 system;
- Capitalizing on community and family strengths to support the entire learning community;
- Focusing resources on the communities with the greatest need, taking a holistic and equity-based approach to determining need; and
- Incentivizing collaboration among all Illinois state-sponsored programs

We hope that ISBE will use these ideas as a catalyst to better serve children, families, and communities.

Handwritten signature of Beth Purvis in blue ink.

Beth Purvis
Co-Chair, Illinois Early Learning Council

Handwritten signature of Phyllis Glink in blue ink.

Phyllis Glink
Co-Chair, Illinois Early Learning Council



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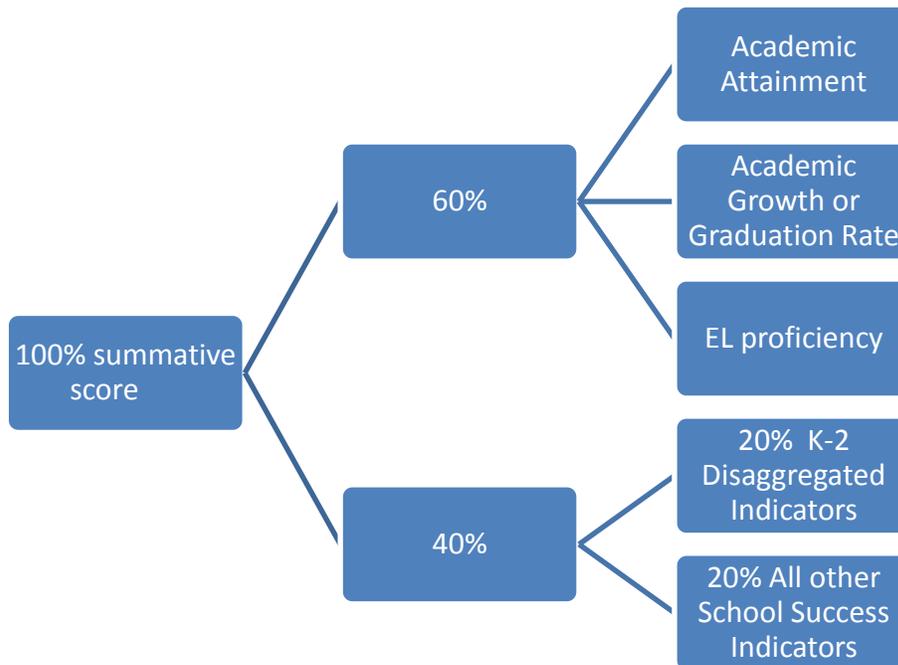
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SECTION 3: ACCOUNTABILITY, SUPPORT AND IMPROVEMENT FOR SCHOOLS

Section 3.1 Accountability System

School Success Indicator

- Under Indicators (p. 32), we support the inclusion of chronic absenteeism (defined as missing 10% or more of school days) as an indicator. We believe indicators should be clear, fair, developmentally appropriate, and actionable by school administrators – that is, not simply proxies for a school's poverty rate. We believe chronic absenteeism meets that standard, and also has the important value of being measurable prior to third grade.
- Under weighting of indicators (pp. 33-36), we support disaggregating all indicators that can be disaggregated by grade, and having those indicators that can be measured directly in K-2 count for at least half of the School Success Indicator score for all elementary schools (at least 15%). To demonstrate what we mean we have adapted the graphic used by ISBE to demonstrate the allocation of a 60/40 balance between assessment-based indicators and School Success Indicators for an elementary school:



- ISBE has raised the possibility of developing a more focused K-2 accountability indicator. We fully support the development of such an indicator. We recognize that this indicator cannot be developed thoughtfully prior to the April deadline for ESSA plan submission, but look forward to working with ISBE to develop this indicator in the years ahead.



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English Language Proficiency

- In the discussion of Languages Other Than English (3.1E, pp. 16-17), the draft acknowledges the annual measure of English language proficiency as a key element to the accountability system; it is one of the mandated indicators. States must report on both the percent of students who become proficient on the ACCESS assessment in a given year along with the growth students make towards proficiency in grades 3-12. Currently, all ELs in Illinois in K-12 are assessed annually. The WIDA Consortium reports that some of the greatest growth occurs in K-2. Given that higher rates of growth in English tend to occur in the early grades, ISBE should include data from K-2 when reporting on the indicator at the school level. ISBE should also include all ACCESS 2.0 data K-12 when reporting on the EL Indicator for accountability purposes.

The ISBE draft plan #2 points to the inclusion of academic indicators in English Language Arts and Math. Currently, the English Language Arts exam is only available in English. Fostering instruction in a child's home language is critical in the early learning and K-2 years, as it is a means of building content knowledge that contributes to children's achievement on content exams conducted in English. In accordance with research, the language of instruction should always match the language of the assessment. When content assessments in 3rd grade and up are only available in English, there can be a tendency to shift from home language instruction to English as early as 1st grade—even when this is contrary to best practice—in order to meet the English language demands of the assessment.

Title I regulations call for states to make every effort possible to offer academic content assessments in languages other than English when 30 percent or more of English learners speak the same language. ISBE should develop home language assessments along the Prek-12 continuum – including assessments prior to third grade whose results would not be used directly for accountability purposes -- to ensure quality language and literacy development for ELs. This would also ensure the provision of valid and reliable data for measuring student growth. ISBE should offer native language content exams for language arts and science as part of a suite of state of approved assessments for accountability under ESSA.

- In the discussion of the growth model and indicator weighting (pp. 23-26), English learner growth toward English proficiency is a more reliable indicator of student success, as it allows the state to account for the diversity of the subgroup. In order to adopt a rigorous growth to proficiency model, ISBE must define the exit criteria for transitioning from EL status, articulate a specific timeline, take into account baseline data and calculate growth trajectories.

Illinois is a member of the WIDA multistate consortium. WIDA analysis of data from multiple states suggests that EL growth toward English proficiency is non-linear. There are three important variables considered in the recommended Growth to Proficiency model: grade level of the student K-12, starting level of proficiency, and the time it will take to reach the scale score, which equates to a 5.0 overall composite. Below are the specific recommendations for the EL subgroup and the accountability indicator under ESSA:

- ISBE should define the statewide exit criteria for transitioning from EL status to be an overall composite of 5.0 on ACCESS 2.0. (The scale score for reaching a 5.0 composite varies by grade level K-12)
- ISBE should adopt a 5 year timeline for reaching English language proficiency and for calculating appropriate growth. The 5 year timeline will begin in grade 1, which is the first grade of mandatory attendance in Illinois.



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- ISBE should develop the WIDA Consortium recommended -Growth to Proficiency model for reporting data at the school level.
 - WIDA contends that a rigorous GTP model will suffice for reporting on the EL indicator, according to federal regulations. Accordingly, this is the desired option.
 - If ISBE chooses to report on both growth and the number of students reaching English proficiency in a given year, the data must include all students in grades K-12. ISBE should weight the growth portion of the indicator at 80% and the number of students reaching proficiency should be evaluated in terms of the state average, which would comprise the remaining 20%.
- ISBE should report on the number of EL students enrolled in a school K-12 achieving the appropriate growth on the annual exam.

Section 3.2 Identification of Schools

- Under 3.2A (page 42), we agree with the sentence: “ISBE believes increased student outcomes should be aligned to the totality of the state’s accountability system, not a single assessment or measure. The final federal accountability rules make clear that “student outcomes” does not need to mean only assessment results. The same is true for 3.2B (page 44).
- Under 3.2B (page 44), we suggest the following change: “That a school, in addition to no longer meeting the eligibility for comprehensive support and improvement, has established an improvement trajectory for the identified student demographic group to bring its performance into alignment with the state’s long-term goals.” Because the term “growth” is used frequently to refer to improvements on assessment results, we believe the term “improvement” will more precisely convey what we believe is the intent of this paragraph: the school needs to show improvement in student outcomes, whether those outcomes are assessment-based or not. An equivalent change might also be appropriate under 3.2A (page 42), although that language makes more specific reference to “attainment” than the language of 3.2B.
- Under 3.3A (pages 46-47), we support ISBE’s proposed approach. We would ask ISBE to clarify and specify that “the level of ‘need’ of the school and district” can include the level of need for improved early learning services, if the needs assessment demonstrates that the school’s kindergarteners are entering the school below grade level. This criterion is relevant to prioritizing among elementary schools within the lowest 5% of overall performance.
- Under 3.3B (pages 47-48), we ask ISBE to specify that the school-level needs assessment will include early learning. We suggest the following additional text: “The school level needs assessment for elementary schools will include information about the landscape of early childhood programs -- including its resources, strengths, and weaknesses – drawing on information from existing needs assessments, including those from Head Start; population information; a description of the landscape of the early childhood opportunities (including data on quality and access) for children in the catchment area of the school; and child assessment data from kindergarten entry through third grade.”
- Under 3.3C (pages 48-49), ISBE require that the description of interventions include the following: “Where a needs analysis demonstrates that a significant challenge in a school is that children are entering kindergarten behind, school improvement resources may be targeted toward improved school readiness interventions that meet the ESSA requirements for rigor. Strategies for improving school readiness may include both programs implemented directly by the district and programs implemented primarily by community partners, with the exact

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mix of services to be dictated by community needs. Schools can look at both increasing access to and improving the quality of existing early learning programs.”



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SECTION 4: SUPPORTING EXCELLENT EDUCATORS

- Under 4.1A (page 51), we suggest the following edit: “Align the process of auditing approved PD providers with the definition of “professional development” as defined by Learning Forward and remove provider approval status from those providers not in compliance with the definition. Early learning should be included in the professional development alignment.”
- Under 4.1A (page 51), we suggest the following edit: “Establish an annual PD audit. The first provider audit process will begin in the fall of 2016. Early learning should be included in the audit.”
- Under 4.1A (page 51), we suggest inserting the following section after the first paragraph (“In addition to completing...”) on page 51: “While the state places teacher candidates in diverse student teaching settings, this should not be limited to the teaching candidate. Upon certification and licensing, Illinois should invest in a system that incentivizes already-certified and licensed teachers to hold stable, non-temporary, or short-term contracts in low-income and minority communities. Furthermore, there should be specific focus on recruitment of experienced teachers, so that schools in these communities are not inequitably left with staff that has relatively little to no experience.”
- Under 4.1A (page 51), we suggest inserting the following section after the second paragraph (“All programs must align...”) on page 51: “The education sector should look to form partnerships to establish sector-based workforce development programs that are offered in minority and low-income communities – such as those within the nursing and manufacturing sectors. These programs could create a pipeline for there to be increased diversification moving through the education career pathway. Preparation programs need to be accessible to non-traditional students who may not be able to enroll as full-time students, have limited transportation, and/or have varied work schedules if currently employed. Additionally, programs should be equipped with sufficient supports that will adequately orient and guide individuals through their preparation program and the state licensing and certification system.”
- Under 4.1A (page 52), we suggest inserting the following section after the description of IL-EMPOWER: “Preparation coursework and ongoing professional development opportunities should include focus areas of cultural competency, cultural responsiveness, and anti-bias approaches. Trainings on implicit biases associated with race/ethnicity, ability, and national origin/immigration should be provided to instructional and administrative staff. Doing so would help diminish and address those implicit biases which have been shown to impact teachers’ expectations of students and the engagement of their parents/families, perceptions of student and parent behaviors, and students’ own perceptions and beliefs.”

Section 4.2 Support for Educators

- Under 4.2 (page 53-54) ISBE requests feedback on its proposed use of Title II funds. We thank the agency for committing to equipping school leaders, both teachers and principals, to act as instructional leaders, particularly for teachers in the early grades. We also thank ISBE for highlighting family and community engagement and behavioral health issues, among others, as proposed uses of Title II funds.
- Under 4.2A (page 52-54), we suggest inserting the following language: “Professional learning opportunities provided to districts, especially those identified for comprehensive services, should include strategies regarding family and community engagement, as well as the use of referral mechanisms that link children to appropriate

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services. In addition, districts should be encouraged to work with local and regional collaborations, such as those funded through AOK Network, the state's preschool expansion grant and the Maternal, Infant and Early Childhood Home Visiting (MIECHV) program."

- Under 4.2 (page 54), ISBE requests feedback on its proposed use of Title II funds. We suggest the following addition: "Title II professional development resources can be most effective when used to support the alignment of learning environments during the early childhood and early elementary grades, when the trajectory of a child's learning can best be impacted. Title II funds should be used in the following ways: 1) develop sequenced curricula, instructional expectations, and appropriate assessments between early childhood and early elementary classrooms; 2) promote age appropriate quality instruction in the early grades that enhances principal's knowledge of play- and activities-centered learning environments that engage students and supporting teachers in shared lesson planning, analysis of assessment data, and problem-solving; and 3) focus attention and resources on student-based early learning and K-2 environments to strengthen learning in subsequent tested grades.
- Under 4.2B (page 54), [ESSA provides opportunities](#) to expand high quality inclusion within early childhood settings. [Research shows](#) that attitudes and beliefs are often the biggest barrier to preschool inclusion. To reduce disparities in outcomes for children with disabilities, we must ensure that the professionals serving them in both school-based and community-based programs have the competencies and confidence to support them. This requires not only ensuring that children can enroll in all early childhood programs, but also that we have cross-sector professional development and embedded coaching and support.
- Under 4.2B (page 55), we suggest the following sentence following the bullet points on page 55: "ISBE will work to ensure that existing data systems and supports for improvement (Ed360, Online Impact, etc.) include data, assessments, and supports that are developmentally appropriate for leaders and teachers responsible for preschool-aged students.



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SECTION 5: SUPPORTING ALL STUDENTS

Supporting All Students

SECTION 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS

A. Transitions, continuum of a student's education from preschool through grade 12

- Under 5.1A (page 57), we applaud ISBE for recognizing that learning begins at birth and acknowledging the Illinois Birth – 5 Program Standards and the Illinois Early Learning and Development Standards (IELDS) in the plan. We encourage ISBE to consider taking additional steps in the early years and grades that would strengthen the birth—grade 12 continuum, including implementing policies to guide transitions from birth to three services into preschool and Head Start programs, and then from these programs and services into kindergarten.
- Under 5.1A (page 58) we suggest adding to capitalize on ECE gains, professional development and resources will be provided to preschool and kindergarten teachers to support the transition of children and families to kindergarten. We recommend ISBE clearly state that timely and appropriate transitions for children receiving Early Intervention will be provided and that children receiving Early Intervention will receive a timely evaluation and an IEP if needed. This will allow children to be appropriately transitioned to preschool special education services, or appropriate community supports when the child turns three.
- Under 5.1A (page 58), we also recommend that ISBE require districts to create transition plans in collaboration with community stakeholders that create a shared understanding between early childhood programs, schools, administrators and families of what children should experience between early childhood programs and schools and between kindergarten, first grade and second grade. These should be thoughtful and inclusive of providers, parents, school leaders and early learning community leaders.

B. Equitable access to a well-rounded education in all subject areas

- Under 5.1B (page 60), we believe that to be effective in addressing the needs of the whole child regardless of setting, it is critical that all students, beginning at the early childhood level, have access to school nurses, guidance counselors, social workers, mental health professionals, and other resources to address child health in their programs. Please refer to the Illinois Early Learning Council's [Proposed Plan for Integrating Health into Early Care and Education Systems](#).
- Under 5.1B (page 60-61), we suggest the following edit: “Equitable access to a well-rounded education, beginning in early childhood education, in subjects such as English, reading/language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, history, geography, computer science, music, career and technical education, health, physical education, and any other subjects, in which female students, minority students, English Learners, children with disabilities, and low-income students are underrepresented;...”
- Under 5.1B (page 61), we appreciate ISBE's commitment to addressing barriers and providing supports for young people who are struggling. We recommend specific assurance that ISBE will provide access to high quality early learning programs and wraparound services that are targeted to underserved communities with services that are targeted to underserved communities with persistent poverty. A body of research supports that high quality early learning programs significantly improve academic achievement for children of color and/or children living in poverty. Children living in these communities may also be exposed to higher levels of violence, trauma, and toxic stress. For them to feel safe and achieve in school they will need a trauma informed school climate with professionals that are prepared to support their learning.

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C. School conditions for student learning: bullying, discipline practices, student health and safety

Under 5.1C (page 62), we recommend the following:

- Begin the section by referring to the preschool expulsion and suspension rates that disproportionately impact low-income students of color and set a trajectory for future school failure. All state sponsored early childhood education programs should be required to develop behavior intervention policies, which are developmentally and culturally appropriate for the early learner.
- To be effective in addressing the needs of the whole child regardless of setting, it is critical that all students, beginning at the early childhood level have access to school nurses, guidance counselors, social workers, mental health professionals, and other resources to address child health in their programs. Please refer to the Illinois Early Learning Council's Proposed Plan for Integrating Health into Early Care and Education Systems <http://bit.ly/2e315qA>.
- That ISBE should provide practitioner-led professional development and additional resources for social-emotional screening and behavioral health intervention at the early childhood level.
- Insert the following sentence: "Schools should provide resources by connecting students and families to support services they need, including SNAP, TANF and All Kids, therefore creating a more supportive environment for learning and decreasing absenteeism."

D. Effective use of technology and digital literacy

- Under 5.1D (page 63), we suggest there should be four strands of technology work. On page 64: The fourth strand of work involves providing guidance to early childhood education programs. To address digital literacy of all students, ECE student access to technology and the integration into student learning will be developmentally appropriate and follow the joint guidelines from the U.S. Department of Education (DOE) and Department of Health and Human Services (HHS) on technology and early education. Please refer to the following website: <http://tech.ed.gov/earlylearning/principles>

E. Parent, family, and community engagement

- Still under 5.1E (page 66), we applaud the comprehensive approach ISBE has taken to family engagement, particularly with respect to young children and families and English Learners. We appreciate ISBE's partnership with the Illinois Early Learning Council on family engagement efforts focused on the early learning community.
- ESSA allows family engagement funds to be used for joint professional development inclusive of early childhood educators, which creates more consistency and alignment in how families are engaged before and after school entry and provides opportunities for early learning providers and schools to partner and learn from one another to best meet the unique needs of families in their communities." We recommend that ISBE outline how it will use professional development funds and family engagement funds for joint professional development between ECE and K – 12 to best meet the unique needs of families in their communities.
- We ask ISBE to describe how it will implement authentic parent and family engagement to include community-based programs, as well as reach underserved families beyond the walls of the school and outside of school hours.

F. Accurate identification of English Learners and children with disabilities

- Under 5.1F (page 67), we thank ISBE for ensuring that, within the standard process for the identification of ELs in Illinois, there is a *priority* to identify children with disabilities, who may or may not need additional services other than linguistic services. We suggest adding the following sentence: "It is critical that Illinois continue the practice of using qualified bilingual educational support personnel in identifying ELs with special needs." This

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last paragraph avoids potential misidentification. EL students are entitled to both ESL/Bilingual and Special Education services if the child receives an IEP.

- As the SEA identifies English Learners, it should use that data to better understand where and how services can be delivered and the types of services and supports needed.
- Illinois should continue to serve ELs beginning in ECE with culturally and linguistically sound programming. Please refer to the joint statement issued in 2016 by the DOE and HHS https://www.acf.hhs.gov/sites/default/files/ece/dll_policy_statement_final.pdf.
- EL years of service should be counted beginning in first grade, which is the first mandatory age of enrollment in Illinois.
- ELs once identified should continue to be served in programs until they meet the state established reclassification criteria.
- ISBE should demonstrate the importance of successfully serving English Learners by maintaining a senior staff position overseeing these policies.

SECTION G - Other state-identified strategies

Title I

- Also under 5.1G (page 67-68), we suggest adding the following sentence: “ISBE will incentivize LEAs to use Title I funding to expand ECE programming in schools that are underperforming.”
- Continuing under 5.1G (page 67-68), we thank ISBE for incorporating a number of our suggestions, including 1) a commitment to support districts in providing programs and activities foster safe, healthy, supportive environments with adequate school resources (such as enough counselors, social workers, special education personnel) to address high level needs such as deep poverty, homelessness, community violence, and trauma, and drug free environments that support student academic achievement; 2) a commitment to use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs to reduce exclusionary discipline, implement evidence-based mental health awareness training programs, and expand access for school-based counseling and mental health programs; and 3) a commitment to include trauma-based responses within counseling programs as part of the 21st Century Community Learning Centers program.
- Finally under 5.1G (page 68), we recommend that ISBE consider using Title I funds to provide dedicated support for local collaboration that links early childhood programs and elementary schools (following the best practices from the Consortium for Community Systems Development project).
- Under 5.1H (page 69), we recommend the following addition, ISBE will use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs and early childhood programs to reduce exclusionary discipline etc.
- Also under 5.1H (page 69), we recommend ISBE consider encouraging LEAs to include evidence-based early education opportunities to address the achievement gap. To promote effective uses of funds to support ECE, ISBE should provide a list of evidence-based models that LEAs can fund through Title IV grant funding. These may include Community Schools, home visiting programs such as those supported through MIECHV funds, and the



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Chicago Parent/Child Centers model. The value of transitions should be emphasized as children move from early childhood programs into elementary school through application requirements for 21st Century Community Learning Center funds. Priority should be given to LEAs and partner organizations that can demonstrate an evidence-based approach to transition activities that are developmentally appropriate encourage data sharing and include joint professional learning opportunities. To ensure coordination, the applications for SSAEG should require LEAs to include data and other information from the local collaborative in developing the required needs assessment.

SECTION. 5.2 – PROGRAM SPECIFIC REQUIREMENTS

Title I, Part C – Migratory Children

- Under 5.2B, (page 72), Education of Migratory Children, we suggest adding the phrase at the end of paragraph 1, ISBE will coordinate with Migrant Head Start and use the Migrant Student Information Exchange (MSIX) to ensure seamless transitions to K-12 for early childhood migrant students.

Title III Part A:

- Under 5.2C (page 81), we recommend adding the following, “As children enter programs supported by the Prevention Initiative, the intake process will note the language of the caregiver in order to plan appropriate services from the beginning”. Further we recommend, beginning at age three, the Home Language Survey be used for all state-funded early learning programs and we recommend that ISBE consider replacing the current Home Language Survey with the recommended language survey included in the U.S. DOE Tool Kit (<http://files.eric.ed.gov/fulltext/ED564264.pdf>). As students enroll in schools, the local school district administers a Home Language Survey (HLS) for all students new to the district during the registration process, for the purpose of identifying students of non-English background.

Also under 5.2.C (page 81), we suggest that data on student progress and achievement be disaggregated by the number of years a student has been in an EL program. Additionally, we recommend that ISBE consider ongoing tracking of ELs' academic achievement beyond the point in time the student is considered English language proficient.

Finally under 5.2C (page 82), we suggest a few addition considerations for Title III:

- We suggest adding that ISBE will support early dual-language programs as a pathway to promoting bilingualism and biliteracy, in consideration of the state's efforts to endorse the Seal of Biliteracy awarded to high school seniors.
- Due to the current shortage of bilingual endorsed ECE teachers in Illinois, we recommend ISBE consider setting aside a portion of Title III funds to explore changes to ECE teacher preparation programs in consultation with the Illinois Advisory Council on Bilingual Education.

McKinney-Vento Education for Homeless Children and Youth

- Under 5.2E (page 83-104), we thank ISBE for incorporating our suggestions 1) to provide trainings on McKinney-Vento Homeless Education for child care, Head Start, and Early Intervention staff; 2) to collaborate with Early Intervention staff on identifying and providing services to homeless children and families; and 3) to provide training to Early Childhood program grant participants on McKinney-Vento Homeless Program with emphasis on identification, immediate enrollment procedures, rights to return to the “school of origin,” transportation, and Student Information System data reporting through conference presentations and workshops.

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Also under 5.2E (page 83-104), while we were thrilled to see a focus on referring children experiencing homelessness to Early Intervention, we urge ISBE to ensure that all infants and toddlers experiencing homelessness are identified and referred to *the full range* of early care and education programs for which they are eligible, including child care, home visiting, and Early Head Start, among others.

Still under 5.2E (page 84-85), we suggest the following edit: “Create an annual work plan with measurable goals to give the Office of the Coordinator an opportunity to revisit and revise, as appropriate, policies and procedures. The process to create, implement, and/or assess the achievement of this annual work plan should involve stakeholders.”

Further under 5.2E (page 85), we thank ISBE for incorporating our suggestion to make data on the number of students identified as homeless publicly available on the ISBE website. We suggest that data be broken down by age/grade level/race/ethnicity, including children under the age of three. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Still under 5.2E (page 87), we suggest inserting the following sentence somewhere within the School District LEA Homeless Liaison section on pages 87-88: “Ensure that ISBE early childhood policies, manuals, and training materials/efforts reflect the importance of recruiting, identifying, and enrolling homeless children in ISBE-funded early childhood programs.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Further under 5.2E (page 88), we suggest the following edit: “Homeless children and youths in Illinois will be identified by school personnel and through coordination of activities with other entities, such as homeless shelters and community service agencies. The Common Form (<http://www.isbe.net/homeless/pdf/83-01-common-form.pdf>) was created for LEAs to use when enrolling homeless children and youths. In addition to information on enrolling children and youths into school, it also asks for other children and youths residing in the home to be listed. That allows LEA homeless liaisons to reach out to families with preschool-aged children to assist with finding preschool placement for that child. It also allows LEAs to work with families who may need early intervention services for children ages birth to 3 years of age. Common Form will be updated to better reflect and support referrals to early care and education programs, particularly those programs that serve infants and toddlers, like Early Intervention and home visiting.”

Finally under 5.2E (page 91), we encourage ISBE to name the Part B 619 as a collaboration partner on developing Special Education policies and procedures. We also suggest adding more detail to the “5. Offers resources and support for pregnant and parenting youth” activity.

ED-RED

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December 27, 2016

Dr. Tony Smith
Illinois State Board Of Education
100 W. Randolph, Suite 14-300
Chicago, IL 60601

Re: ED-RED's Comments to ESSA State Plan Draft #2

Dear Dr. Smith:

The below comments are being submitted by the ED-RED Executive Board, Education | Research | Development (**ED-RED**). ED-RED is a coalition of nearly 90 school districts, special education cooperatives and Intermediate Service Centers in suburban Cook, Lake and DuPage counties in the Chicago, Illinois area. ED-RED monitors and educates its membership on State and Federal education policy issues, particularly issues of priority for our member districts. As you can imagine, the ESSA State Plan is a priority issue for our districts.

On behalf of our membership, we again thank you for the opportunities that you have made available for us to provide feedback to ISBE on the State Plan Drafts. We look forward to continuing the dialogue with you and other stakeholders as Illinois nears the deadline for submitting the ESSA State Plan to the U.S. Department of Education in April. Please let us know if you have any questions or concerns regarding the attached comments.

ED-RED Comments to ESSA State Plan Draft #2

1. Student Academic Assessments

As noted in ED-RED's previous comments to ISBE ESSA State Plan Draft #1, many of our districts remain concerned over the continued use of PARCC to assess ELA and mathematics in grades 3-8. Some of the concerns outlined were the lack of continuity and alignment between the assessments administered in elementary and secondary grades, that PARCC results are not meaningful to schools and parents, and that PARCC data does not inform instructional practices. For these and other reasons, the weight that many of our districts give these test results have been greatly diminished.

We would note that a few of our districts have become more confident in the PARCC assessment this school year. Although the length of the ELA and mathematics tests remain a concern for them, these districts have found that some of the changes and improvements made to the assessment (including the release of preliminary data that was provided to districts this past fall), have made the test more informative.

Given that the State's contract with PARCC ends on June 30, 2018, we urge ISBE to research and identify a reliable assessment for elementary feeder districts that adequately measures student growth over time, aligns to the assessment used in secondary schools, and timely informs instructional practices. Some options to be considered are the K-8 assessment that SAT is in the process of developing, the NWEA MAP test (which we also understand is being adapted to meet ESSA assessment eligibility requirements) and/or any other assessment that meets the above criteria. Once an assessment is identified which meets local, state, and federal needs, ISBE needs to continue to use this assessment over a period of time. This will allow our districts to use the data in a meaningful way that and to accurately demonstrate school accountability.

2. Student Academic Assessments

Illinois middle schools are currently provided with the option of using PARCC high school course-based assessments to assess their students taking advanced mathematics

courses (e.g. Algebra I when a student is in middle school). Given that many of our districts value using a uniform test across each grade level and would be opposed to administering multiple tests to students within a grade level, we want to ensure that this option remains just that, an option. Additionally, the State has the responsibility of determining whether students are meeting grade level standards. It would be inappropriate for the State to hold students in advanced math classes to higher expectations than their grade level peers. Therefore, the ultimate decision of which test to administer must be left to the local school district.

3. Student Academic Assessments (Illinois Science Assessment)

We want to ensure that the Illinois Science Assessment aligns with the new Illinois State Standards for Science, also referred to as the NGSS standards. Our districts' teachers teach to those standards and we want to ensure that our students are accurately assessed in this subject. Additionally, test results need to be timely in order to inform teaching practices. We have not received timely results on last year's Science assessment which has caused Illinois school districts to lose confidence in this assessment. Also of concern is that, to date, our districts have not yet received any information on the 2017 Illinois Science Assessment implementation. If our districts will be required to continue administering this test, we urge ISBE to make improvements so that it offers some value to our schools.

4. Student Assessment for English Language Proficiency

We support ISBE's current proposal to convene stakeholders for the purpose of considering the WIDA recommendations on the ACCESS test (the EL proficiency test currently in use) and have that group submit recommendations to ISBE. However, given that the final draft of the State Plan is due in July, 2017, we would urge those recommendations to be made sooner than June 30, 2017. We also request to have a representative from ED-RED be included in those meetings.

5. Universal Design for Learning (UDL) – Mathematics Testing On-line

Under ESSA's requirement for Universal Design for Learning, ISBE must describe how its state assessments "ensure that each and every student can access the content and constructs being measured in a way that meaningfully documents what they know and are able to do." As noted in our previous comments, for any math assessment that requires students to demonstrate their mathematical thought process, students must

be provided with the option of writing down their mathematical thinking in written format. Currently, students taking their tests electronically must also show their work electronically. A written option is particularly important for students in grades 3-8 who are regularly encouraged throughout the school year to show their thought process on paper.

For those districts that have been able to incorporate technology into their mathematics curriculum during the school year, students showing work electronically may not be as much of an issue. However, for schools where this has not occurred, students that are required to demonstrate their mathematical thought process electronically are not being afforded the opportunity to be measured in a way that “meaningfully documents what they know and are able to do”, as required by ESSA. For these students, as several of our districts have noted, they become confused by having to show their math thought process electronically and become frustrated in accomplishing this task.

Again, we would want to ensure that these written documents are being used for evaluation and assessment purposes so that students can earn credit for their demonstrated thinking, reasoning and modeling. Additionally, would like to confirm that this is, in fact, the case since a student’s ability to find the correct answer is only one aspect of solving a math problem. Other skills involved in working through and solving a math problem should be recognized and validated in any math assessment. If this is not the case, while problematic due to the reasons stated above, the administrative oversight required for a written option would not be worthwhile.

6. Student Assessments – Language Other than English

Currently, only the math portion of the PARCC assessment is trans-adapted into Spanish. ISBE noted that it received comments suggesting that content assessments be made available in languages other than English when 30% or more of the EL students speak the same language. We support providing EL students with the option of taking an assessment in their native language or English; provided, 1) the choice is left to the student as to which language he or she prefers to be assessed; and 2) school districts are not responsible for any additional costs of trans-adapting the assessment into the various languages which must be administered.

However, setting the threshold at 30% of the EL students at a given school seems to be arbitrary and would vary greatly across schools depending on the total number of EL students at each school. We would recommend that ISBE consider using the subgroup

number (see comments below regarding appropriate subgroup number) or a possible combination of 30% of the total EL students in addition to reaching at least the subgroup number.

7. Accountability – College and Career Readiness Definition

ED-RED is opposed to the definition of College and Career Readiness adopted by ISBE at its September board meeting. That definition is too restrictive, will not serve the interests of our schools and students and does not reflect the national, research-based model that District 214 has worked on in length, in conjunction with AASA.

8. Accountability - College and Career Readiness Definition

ED-RED believes that the College and Career Readiness framework presented by Dave Schuler and Kevin O’Mara on behalf of IHSDO at the November 18 ISBE Board meeting is a stronger model. While we support this framework in concept, we would make the following recommendations:

- a. We understand that the number of students that meet one of the four College and Career Readiness pathways (A, B, C or D) would be added together and reported as the aggregate number of students that meet any College and Career Readiness Pathway. We support that. We do want to clarify that it is not the intention of ISBE to also report the number of students that meet each pathway designation. Given that every one of these pathways is an evidence-based indicator of College and Career Readiness, we want to ensure that the intent is only to report them in the aggregate.
- b. Additionally, given the connotation that letters (A, B, C and D) have in the education world, we are concerned that by labeling each pathway with a letter, the public might infer that one pathway is more beneficial than others. We would recommend ISBE consider using descriptive words to identify each pathway.
- c. We understand that the Seal of Biliteracy was not included as an academic indicator because there is currently no research to support its inclusion in the College and Career Readiness framework, as required by ESSA. Given that there is a substantial amount of research that demonstrates the positive impact of learning multiple languages on brain development, many of our districts feel that the Seal of Biliteracy is a valuable achievement for students and should be included. In the event that ISBE concludes that there is insufficient evidence to include the Seal of Biliteracy in the framework at this time, we urge ISBE to conduct such research over the next few years so that, if appropriate, it can be

added to the framework when the State reviews and updates its State Plan (as is required every 4 years under ESSA).

- d. As it relates to Pathway A, we believe that a minimum composite score should be used for the ACT and SAT, rather than requiring students to reach a minimum score for each of the subject areas (i.e. the proposed scores for ACT are: English – 18; Math – 22; Reading – 22 and Science – 23). The ACT composite score takes into account all subtest scores and research shows that the composite is a stronger measure of overall performance. The only individual subtest scores that have been found to be a predictor of college performance are the English and math subscores. Because individual reading and science subscores have not been shown to be a predictor of college performance, those cut scores are not as meaningful and, therefore, should not be the determining factor as to whether a student is successful in this particular College and Career Pathway.

9. Accountability – Student Growth

As noted in the State Plan, we agree that each of the proposed models have strengths and weaknesses. We would urge ISBE to continue considering the Student Growth Percentiles, Value Table Models, as well as hybrid models of each. The Growth to Proficiency model is the least appealing of the models presented.

While there are concerns with all models, we feel it is critical that:

- 1) Any student growth model does not serve to penalize districts that are not adequately funded and that have high subgroup populations (i.e. low income, EL, etc.).
- 2) Student growth measurements are dependent on a student’s initial score.
- 3) A student growth model should reward schools that are able to achieve a year of growth for students despite chronological age indicators. While every effort needs to be made to educate students who have fallen behind, there is a realistic amount of growth that can be achieved in a given year. We want to avoid an accountability system that causes schools to implement interventions of such intensity that are inappropriate and unrealistic. Such an approach can backfire and result in students disliking and disengaging from school rather than developing passionate learners who enjoy and are able to celebrate their successes.

10. Accountability - Subgroups

We recommend that ISBE use a subgroup (“n”) number of 30, rather than 20. The final federal regulations allow states to set the highest “n” number to be used at 30 (and

possibly higher, if the State can justify it). The threshold of 30 for a subgroup is generally considered the minimum sample size for statistical analysis. Setting subgroups smaller than that can result in less precise data. Because the sample size in ESSA could play a big role for accountability purposes, including the determination of what districts are identified as needing targeted supports, it is critical that subgroup data be statistically significant.

We understand that some stakeholders believe that the “n” score should be 20 due to the requirement that when the number of students in a school who all speak the same language reach the number 20, it triggers the requirement that the school provide Transitional Bilingual Education (e.g. instruction in core content areas in the home language and English). While this rationale may make sense for the EL subgroup, it does not make sense for the other subgroups.

ESSA requires that the subgroup “n” number be the same for all subgroups (EL, Special Education, low income, etc.). We feel that for the benefit of all subgroups affected, the subgroup size needs to be set at a level that ensures statistically significant results.

11. Accountability – Other Indicators for School Quality and Student Success

In ISBE’s 2nd draft of ESSA, it indicated that 6 non-academic indicators had been identified in comments to ISBE’s 1st draft of ESSA. However, it was unclear whether ISBE had also narrowed the initially presented 40+ non-academic indicators down to these six indicators. Assuming that those are the 6 indicators ISBE is looking at (in addition to one other non-academic indicator that was mentioned elsewhere in draft #2), our position on each is below:

- a. Chronic Absenteeism – our districts that have looked into their own data on this issue have found that chronic absenteeism is highly correlated with the district’s low-income students. We know that there is research which demonstrates that an aggressive and intensive approach to working with these students and families can have positive results.

Our concern is that currently, the State significantly underfunds our schools and has been doing so for years. While we have been working with legislators and stakeholders over the past couple of years on the development of the evidence-based formula, the legislature would still need to identify how to fund such a model. In the absence of adequate funding for all schools in Illinois, we are

concerned that using this indicator would only serve to penalize schools with high low-income populations that are not adequately funded. For that reason, we do not support the use of this indicator.

- b. College and Career Readiness – We support the use of this indicator subject to comments submitted in a separate section of this document. We also note that the AASA is working on a similar model for K-8 schools. Given that this K-8 model is still in the development phase, we cannot comment on it at this time. However, we are eager to review this model once developed and urge ISBE do the same.
- c. 8th grade on track/9th grade on track – In principle, we support the use of this indicator. However, in the past, our districts have had issues resolving their calculations with ISBE’s calculations of this measure. If this indicator is used for accountability purposes, there needs to be improved transparency and communications with school districts on how ISBE will measure this indicator.
- d. School Climate Survey – We oppose the use of this indicator. Any indicator must measure schools across the State uniformly. Currently, districts have the option of using 3 separate climate surveys. We support districts continuing to have this choice to find a survey that meets their needs. As you know, many issues arose when our districts were required to use the 5 Essentials survey. The 5 Essentials survey still contains assumptions about how schools are organized and governed that simply don’t apply to many of our districts.
- e. Growth toward college and career readiness (as measured by 9th grade on track and graduation rate) – we are unclear on how such an indicator would work and would need some additional information before supporting it. We would request clarification from ISBE on this indicator.
- f. K-2 readiness indicator – Without knowing what data would be used for this indicator, we cannot support this indicator at this time. If the intent is to require districts to uniformly administer an assessment such as the Illinois KIDS assessment, we are opposed to such a requirement. The Illinois KIDS assessment is highly subjective and consists of self-reported data by districts. If used well, the KIDS assessment can provide meaningful data for school districts to use internally. However, if this assessment were to be used as an indicator within a State accountability system, the quality of the data reported could be severely compromised. Without additional information on what other assessment (other than KIDS) or what data would be collected to assess K-2 readiness, we cannot support using this indicator at this time.

Additionally, for the non-academic indicators, we strongly urge ISBE to use a minimum of 2 such indicators.

Finally, we would note that many of our high schools districts are voluntarily giving the PSAT in 9th and/or 10th grade so that it can measure student growth at the high school level. If ISBE were to require all high school districts to administer the PSAT or SAT-10 in 9th and/or 10th grade *and the State pays for this test(s)* (emphasis added), this measure of student growth could be used at the high school level as a non-academic indicator (NOTE: our understanding is that ESSA would not allow for it to be used as an additional academic indicator). While we are always thoughtful about providing more standardized testing to students, we feel that student growth is important at the high school level. We are open to considering meaningful ways to measure it.

12. Accountability – Weighting of Indicators

ESSA requires that academic indicators (student growth, attainment, graduation rate, EL proficiency) be given “greater weight” than the other non-academic indicators. ISBE asked for feedback on 3 possible distributions: 60% academic/40% non-academic, 70% academic/30% non-academic, and 51% academic/49% non-academic. With the caveat that it is extremely difficult to recommend an appropriate distribution for these indicators without knowing what the final non-academic indicators are and that our position may change depending on that determination, we provide the following comments:

- We would recommend using either a 60% academic/40% non-academic or 70% academic/30% non-academic distribution. While it is important that the accountability system take into account the “whole child” and schools be given credit for successes in non-academic areas, we are opposed to an accountability system that could result in a district with strong academic performance indicators scoring lower than a district with substantially lower academic performance indicators. For this reason, we recommend using a minimum of a 60% weight for academic measures. We would note that a few of our member districts have advised that they would support the 51% academic/49% non-academic option.
- In the examples provided by ISBE in its Draft #2, ISBE gave equal weight to each of the 3 academic indicators. For example, for a K-8 district using a 60% academic/40% non-academic distribution, ISBE used 20% - attainment, 20% growth and 20% EL proficiency (with 40% attributed to non-academic indicators).

For the weight distribution *within* the academic indicators and *within* the non-academic indicators, we would recommend the following:

- Academic Indicators:
 - We understand the importance of measuring the success of our EL programs for our students. However, all of our schools have varying percentages of EL students. We would recommend some type of adjustable percentage for the EL indicator depending on the percentage of the EL population of the school. However, we understand that ESSA may not allow for different weights to be used for the EL indicator based on those percentages. If that is the case, we believe that setting the EL proficiency weight for all schools at 10% would be appropriate and would serve to ensure that schools are held accountable for this indicator.
 - As it relates to the EL accountability indicator itself, we believe that within that indicator, growth should be given significantly more weight than attainment (i.e. 80% EL student growth/20% EL attainment).
 - As noted in the second draft of ESSA, many stakeholders, including ED-RED, commented that ISBE should put a greater weight on growth over proficiency. However, ISBE stated in draft #2 that it is committed to honoring “both attainment and growth at equal weight.” We understand ISBE’s commitment to considering attainment, but strongly urge ISBE to give greater weight for student growth and less weight to attainment.
 - While student growth is critical, we do want to ensure that districts with a high percentage of students meeting grade level standards are not negatively impacted by the amount of student growth.
- Non-Academic Indicators
 - Given that the College and Career Readiness indicator contains many “sub-indicators” (i.e. attendance, assessment score, grades, co-curricular activities, etc.) and that these “sub-indicators” support the concept of developing the “whole child”, we believe this indicator should be given greater weight than the other non-academic indicators.

13. Accountability – Goal Setting – Long Term and Interim Goals

ISBE proposes using 2032 as the target year for each school to meet each of the long-term goals (see below). Over the first three school years (2017-18, 2018-19 and 2019-20), a baseline would be established for each school. Between 2020-2021 and 2031-32 interim goals would be mapped every 3 years up through the 2032 target year. Our comments to this plan are as follows:

GENERAL COMMENTS:

- We support the concept of establishing a baseline for each school over an initial 3-year period.
- We support using 3 years for establishing interim goals.
- We support setting the target year no earlier than 12 years from the baseline school year.

COMMENTS ON PROPOSED LONG-TERM GOALS

- Proposed goal that all kindergartners are assessed for readiness
Comment: We are opposed to this goal given that: 1) it is unclear whether ISBE would allow districts to have discretion to measure readiness in a way they deemed appropriate (i.e. formative assessments over time). We would note that our schools do support measuring readiness of our students, but the manner in which we do this for our youngest learners is critical; 2) if the intent of ISBE is to require a uniform assessment, there currently is not an appropriate objective assessment available (or, to our knowledge, one that is being developed) to assess all kindergartners in Illinois [since ESSA requires ISBE to revisit the State Plan every 4 years, this goal could also be revisited then if one becomes available]; and 3) it is unclear whether, under this goal, school districts would be held accountable for their students' performance on this assessment. Given the concerns with the KIDS assessment (see above) and that such an assessment would determine the level and extent of experiences that students have prior to entering our school buildings, holding districts accountable for such a measure would be extremely problematic.
- As it relates to the proposed proficiency goals of: 1) 90% or more of 3rd grade students are reading at or above grade level; 2) 90% or more of fifth-grade students meeting or exceeding expectations in mathematics; 3) 90% or more of 9th-grade students are on-track to graduate with their cohort; and 4) 90% or more of students graduate from high school ready for college or career, we offer the following comments:
 - With the exception of using 90%, rather than 100%, we fail to see how these ESSA goals are significantly different from NCLB.

- We believe the notion of setting a uniform achievement goal for all schools should be reconsidered. We acknowledge that there is no easy solution to this, but a one-size-fits-all approach to students achieving proficiency on the above goals can negatively impact classroom practice.
- We do acknowledge and appreciate that ESSA lacks the level of punitive consequences seen in NCLB when a school failed to meet AYP. However, focusing long-term goals on attainment will continue to hurt districts that have high mobility rates, those that are underfunded by the State, and those with historically underserved populations. Given the emphasis on growth throughout the State Plan, we would strongly urge the Board to develop some long-term goals that reflect and highlight a school's gains in this area.

14. Accountability – Meaningfully Differentiation of Schools

It is difficult to ascertain ISBE's current position on summative ratings given that the final Federal Regulations were released after ISBE posted its 2nd draft of ESSA. We would note that while the final regulations affirmed that 3 summative "determinations" (rather than "ratings") be used, it clarified that those determinations could be the same categories of schools set forth in ESSA. Therefore, it could include: 1) those schools requiring comprehensive supports (lowest 5% of schools); 2) those requiring targeted supports (lowest 5% of subgroups) and 3) other schools. We support using these categories at the 3 required summative determinations.

As noted, ISBE released its 2nd draft prior to the release of the final Federal Regulations and stated that if 3 summative ratings were required, it proposed using "initial", "growing", "meeting" and "exceeding." While we agree that these categories are better than the use of letter grades or numbers assigned to schools, we strongly believe that it is critical to avoid any level of shaming for struggling districts, as was the case with NCLB. We feel that our recommendation above is the best way to do that, given the boundaries set forth in the Federal Guidelines.

Finally, we strongly support ISBE's commitment to using data dashboards to measure a school's periodic growth on indicators.

----- Original message -----

From: Jean Korder <jkorder@usd116.org>

Date: 12/15/2016 1:46 PM (GMT-06:00)

To: jhelfer@isbe.net, tony.smith@isbe.net

Cc: Kay Dugan <kdugan@bsd2.org>

Subject: Educator Leaders Cadre ESSA recommendations

As a longstanding established group of advocates for a high-quality assessment system, we took advantage of our time together to develop recommendations specific to Section 3.1, specifically the college and career readiness framework. Those recommendations are attached to this email.

At a time when we are all working hard to implement a system that supports standards-aligned teaching and learning, we feel that any definition or measurement of career and college readiness that relies on grade point average and an ACT/SAT score may inadvertently shift focus from evidence of learning that is directly connected to the learning standards. It is critically important that the vision moving forward reflect an educational system where college and career readiness is reflective of the students we serve on a daily basis and sets forth the expectation for districts and schools to meet the needs of all students regardless of demographics. We have further defined resources to support a statewide system inclusive of a high-quality assessment aligned with instruction that is grounded in the Illinois Learning Standards.

We recognize the monumental task at hand and appreciate your thoughtful consideration of this recommendation.

Respectfully, on behalf of the ELC working group,

Jean Ray Korder
Director of Curriculum, Instruction, and Assessment
Urbana School District 116
205 N. Race Street
Urbana, IL 61801
217-384-3579

Kay Dugan
Assistant Superintendent for Learning
Bensenville School District 2
210 S. Church Road
Bensenville, IL 60106
(630) 766-5940, Extension 111



We believe that each and every student deserves the knowledge, skills, and habits to succeed in college or careers.

Submitted by a work group of the Illinois Education Leader Cadre

Knowledge:

Proficiency in academic content in order to enter non-remedial college coursework or a career pathway

Skills:

Application of knowledge through critical thinking, creativity, communication, and collaboration

Habits:

Behaviors such as perseverance, adaptability, leadership, responsibility, and consideration of multiple perspectives



These attributes are cultivated through equitable, well-rounded public school experiences that include:

- High-quality, personalized instruction aligned to rigorous academic standards;
- Early interventions aligned to student strengths and areas of need;
- A variety of educational opportunities, including:
 - Exploration of multiple careers and industries,
 - Access to specific career skills through industry certification and youth apprenticeships, and
 - Pursuit of academic challenges, such as Advanced Placement and dual enrollment.
- Positive school climate that prevent bullying, build resilience, and support students' behavioral and mental health; and
- Full access to advanced technology that supports digital learning and enhances instruction.

What resources are needed?

- A high-quality statewide assessment system including all students and accurately measures proficiency and growth.
 - *This system "includes a dynamic regiment that values creativity, collaboration, and creativity over mundane measurable." (Tony Wagner)*
- This system includes state-funded diagnostic, formative, and summative assessment tools aligned to the learning standards.
- Access to reliable data from the statewide assessment system for parents and educators to make appropriate adjustments. This system would provide:
 - Immediate data to guide instructional decision-making
 - Summative data for accountability requirements
 - Longitudinal data to reveal patterns
- Comprehensive professional development, focused on the effective implementation of standards and instruction with aligned assessments and data analysis, through a research-based continuous improvement process.
- A comprehensive communication plan to support accurate implementation of this vision.



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SELF-ADVOCACY ASSISTANCE ★ LEGAL SERVICES ★ DISABILITY RIGHTS EDUCATION ★ PUBLIC POLICY ADVOCACY ★ ABUSE INVESTIGATIONS

Sent via email

December 23, 2016

Illinois State Board of Education
100 North First Street, S-493
Springfield, IL 62777
essa@isbe.net

RE: Comments on ESSA State Plan Draft #2

Dear ESSA State Plan Drafters:

We appreciate the opportunity to comment on the Illinois State Board of Education's ("ISBE") State Plan to implement the Every Student Succeeds Act ("ESSA"). Equip for Equality, Inc. ("EFE") is an independent not-for-profit organization designated by the Governor to administer the federal protection and advocacy system for adults and children in Illinois with disabilities. EFE's mission is to advance the human and civil rights of people with disabilities and is accomplished through self-advocacy technical assistance and training, legal services, and public policy initiatives. In 2007, EFE established the Special Education Clinic ("Clinic"), which provides self-advocacy assistance, training and legal representation to families of children with disabilities throughout the state. Last year, the Clinic assisted over 1,400 families across Illinois, with many requests for assistance focusing on the infringement of students' educational rights either due to a failure to make academic progress or a failure to receive education in the LRE.

As a statewide advocate for children with disabilities, we wish to comment on ISBE's draft State Plan to ensure that children with disabilities are appropriately considered within the frameworks established by the plan.

2.2 ACADEMIC ASSESSMENTS

Alternate Assessments and Universal Design for Learning

We agree with the State Plan's design of an alternate assessment system for children with significant cognitive impairments that: 1) remains aligned to Illinois Learning Standards rather than Individualized Education Program goals and 2) incorporates principals of Universal Design for Learning ("UDL"). However, we believe that there are further opportunities to consider how UDL will be used to ensure that the typical academic

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assessments provided to the majority of students, as opposed to the alternate assessment, will be made accessible. This is an area where we believe that school districts need additional support and guidance from ISBE. ***As a result, we suggest that the State Plan include a statement about training opportunities that will be made available to school districts regarding the use of UDL with academic assessments.***

3.1 ACCOUNTABILITY SYSTEM

We have reviewed the accountability system questions that have been proposed for feedback and appreciate the opportunity to comment on areas where we believe the experience of children with disabilities should be further considered and incorporated.

College and Career Readiness Framework

Thank you for providing us with details regarding the four proposed Pathways for the College and Career Readiness Framework. We appreciate that the Pathways will provide multiple avenues for students to achieve the College and Career Readiness Designation. However, we are concerned that the current structure of the frameworks that have been proposed will exclude the important work that many children with disabilities are doing to pursue their individual goals as part of the Individuals with Disabilities Education Act's ("IDEA") transition activities. Under the IDEA, children with disabilities beyond the age of 14.5 are completing activities that are necessary to prepare them for further education, employment and independent living. Transition plans are supposed to be interest- and skill-driven plans that are developed as a result of a period of assessment and planning. Transition activities should be the heart of a student's educational program once in high school and transition programs.

While there are many children with disabilities whose transition activities will align well with the proposed College and Career Readiness Framework, in which students must achieve certain GPA benchmarks, enroll in certain classes and complete career indicators, we are concerned that the important work being done to prepare for post-secondary life by a significant subgroup of children with disabilities will not be captured by this framework. For these children with significant disabilities, their transition activities focus more upon vital vocational development and the attainment of independent living skills. Based on the current proposed College and Career Readiness Framework, it is likely that these students will not be eligible to achieve the desired designation. We are concerned that this will serve as a disincentive to school districts from developing rich transition programs to address these students' needs.

In order to address this concern, we suggest that ISBE develop another pathway to attain the designation of College and Career Readiness that emphasizes career

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readiness experiences and independent skills attainment for children with the most significant disabilities.

Growth Models

We have reviewed the growth models that have been proposed and offer some feedback. First, we believe that the status of a student who has an IEP should be considered as part of the “student characteristics” where examples of gifted learners and low-socioeconomic status have been offered. The status of a student as having an IEP is one that is important for consideration as a student characteristic.

We appreciate that the majority of children with disabilities will be included within these models, as they will be assessed using the State’s typical academic assessments (i.e. – PARCC) and not the alternate assessment. ***In order to best credit the work of school districts to achieve growth with this important subgroup of students, we support the use of the Value Tables model.***

Weighting of Indicators

We applaud ISBE for recognizing important school quality indicators, such as graduation rates and academic attainment. The plan also mentions that the indicators will be reported further based on subgroups without describing the subgroups. Given that children with disabilities are historically among the poorest performing subgroups in both academic attainment and graduation rates, we suggest that the State Plan develop a system for weighting more heavily the performance of children with disabilities. For example, New York City’s accountability model weighs more heavily the graduation of a student with a disability and then further weighs more heavily the graduation of children with more significant disabilities. Educator Guide: The New York City Progress Report High School, 2013, available at http://schools.nyc.gov/NR/rdonlyres/BD3585E6-B686-43F2-97F2-8F0EA3BF71FD/0/EducatorGuide_HS_11_25_2013.pdf. Such a system would reward school districts that are improving educational outcomes for children with disabilities and incentivize ensuring that they achieve these important outcomes. ***As a result, we suggest that the State Plan include a system for weighing indicators for the subgroup of children with disabilities more heavily than those without disabilities.***

N-Size

We are concerned that the State Plan includes a recommended n-size of 20, which we believe will exclude several subgroups from being counted in the State’s accountability system. According to Federal Guidance,

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“A State’s n-size should be no larger than necessary to ensure the protection of privacy for individuals and to allow for statistically reliable results of the aggregate performance of the students who make up a subgroup. The n-size must also be small enough to ensure the maximum inclusion of each student subgroup in accountability decisions.” 104 Fed. Reg. 34553.

We believe ISBE should adopt an n-size of 10 is low enough to ensure the maximum number of subgroups are counted in the State’s accountability system yet large enough to protect student privacy. The Department of Education’s Institute for Education Science has recommended a cell size of 10 for confidentiality purposes. “U.S. Department of Education, Statistical Methods for Protecting Personally Identifiable Information in Aggregate Reporting,” Institute for Education Sciences (2010) <https://nces.ed.gov/pubs2011/2011603.pdf>. Additionally, the Office of Special Education and Rehabilitative Services recently proposed that States set a consistent n-size of 10 students for the purpose of determining whether “significant disproportionality” exists among racial/ethnic groups in the rates at which children with disabilities within each racial/ethnic group are disciplined. ***Since an n-size of 10 is statistically reliable and protects student identity for this purpose, we can reasonably conclude that it should be appropriate for accountability purposes under ESSA.***

5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS

C. School conditions for student learning, including activities to reduce the use of aversive behavioral interventions that compromise student health and safety

While we applaud ISBE for establishing IL-EMPOWER, which proposes to be a valuable tool for the coordination of vital services within our schools, including mental health services, we are concerned that the State Plan does not provide concrete actions that it will take to reduce the harmful and pervasive use of restraint and seclusion. The drafters of the ESSA intended that states would specifically develop plans to reduce the use of restraint and seclusion. The Conference Report Language accompanying the Bill includes the following:

“It is the Conferees’ intent that each State describes how it will support local educational agencies and schools by providing resources and guidance, professional development, and technical assistance to reduce techniques, strategies, interventions, and policies that compromise the health and safety of students, such as seclusion and restraint.” Conference Report 114-354 to Accompany S. 1177, p. 451.

Equip for Equality has long advocated for the reduction in the use of restraint and seclusion in Illinois’ schools based on our experience that the practices consistently do not serve any

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educational objectives and can be life threatening. Too often, school districts claim that these practices are therapeutic, when this could not be further from the reality of what we see in our work. We are concerned that this section of the State Plan does not provide technical assistance directly to address how schools can reduce their practices. ***As a result, we request that ISBE develop specific resources, professional development and technical assistance that can be reasonably expected to reduce the use of restraint and seclusion in Illinois' schools.***

F. The accurate identification of English Learners and children with disabilities

We are concerned that the State Plan has not proposed reasonable strategies to ensure the accurate identification of all children with disabilities. The sole paragraph in this section addresses the identification of children with disabilities who have English Language needs, recognizing an important point that EL students may also have special education needs. ***As a result, we suggest that the State Plan include strategies that it will employ to ensure that Local Education Agencies ("LEA") are meeting their Child Find obligations under the IDEA, including both education and accountability measures.***

5.2 PROGRAM SPECIFIC REQUIREMENTS

F. Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At Risk

Over the last fifteen months, Equip for Equality has learned a substantial amount of information about the educational experience of children with disabilities who are detained by the Illinois Department of Juvenile Justice ("IDJJ"). We currently have a project to advocate for the educational rights of these youth and, through this project, we have witnessed repeated systemic failures of the educational system. As a result, we welcome the State Plan's efforts to reform the educational system for youth who are delinquent.

First, it is important that the schools implemented by the IDJJ are included within any accountability system that is established by the State Plan. These schools suffer when they are not held to accountability measures that are now standard across the state.

Next, in order to achieve the outcomes desired by the State Plan's accountability system, we suggest that the State Plan recognize that the current online learning platform, GradPoint, is not dynamic enough to address the learning needs of all students. Peter Leone, an educational expert who has advised ISBE on IDJJ's educational program, has recognized that GradPoint may not be appropriate for all learners and is demonstrably ineffective for children with learning disabilities and reading deficits. Peter Leone, "The Status of Education Services and Supports for Students in the Illinois Department of

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Juvenile Justice,” Expert Monitor Report, at 6 (November 2016). Given the population of students who are in these schools, the sole use of this online learning platform is hugely inappropriate and potentially failing students. As a result, we suggest that the State Plan include a statement that the sole use of an online learning platform is discouraged.

Finally, there is a statement on p.105 that students are only entitled to “free public education” through Grade 12. However, this is not the case for children with disabilities who are entitled to a free appropriate public education until the day before their 22nd birthdays or graduation. We suggest revising this sentence to include a statement that a student with a disability is entitled to education until the day before his 22nd birthday.

CONCLUSION

Illinois is at a historic period where we have the opportunity to transform educational outcomes. Thank you again for accepting our feedback about how children with disabilities should be further incorporated into this important State Plan.

Sincerely,

Olga Pribyl
Vice President, Special Education Clinic and Pro Bono

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HEALTHY SCHOOLS CAMPAIGN

EVERY CHILD DESERVES TO LEARN + THRIVE

December 19, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #2

Dear Dr. Smith,

Thank you for the opportunity to respond to the second draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

Healthy Schools Campaign (HSC) is a nonprofit organization dedicated to ensuring that all students have access to healthy school environments so they can learn and thrive. ESSA recognizes the need for schools to support the whole child and specifically acknowledges the importance of promoting physical and mental health and wellness. The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning.

In our response to this draft, HSC provides additional recommendations to the Illinois State Board of Education (ISBE) on improving the revised draft plan, responds to questions raised in the plan, and provides supplemental background information to justify our recommendations. Additional information is available upon request.

As we said in our previous comments, ISBE has recognized the connection between student health and education and has taken action to support social and emotional learning, physical health, improved attendance and forward-thinking discipline practices. However, the proposed plan could further prioritize and highlight the importance of key issues such as student physical health and school facilities and their impact on achievement. Throughout the comments below, we provide recommendations that more fully address physical health so that students are in school and ready to learn. In addition, we make suggestions on how to encourage schools to create a healthy school environment. We encourage Illinois to fully embrace the whole child framework and create a national model for integrating health and wellness into its accountability systems, report cards, needs assessments and professional development.

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,



Rochelle Davis
President and CEO

Executive Summary

The Every Student Succeeds Act (ESSA) presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting the physical and mental health and wellness of students.

Illinois has already made a commitment to address the whole child. One of the state's goals is for every school to offer a safe and healthy learning environment for students. In the 2nd Draft State ESSA Plan (PLAN), ISBE clearly states its intention for the PLAN to address the "whole child". And, in many places, the PLAN does address the need to support student health and wellness, but emphasizes social and emotional learning and school climate, family engagement and community engagement. The PLAN does not adequately address many of the other elements important so that students are healthy and ready to learn.

HSC strongly recommends that ISBE establish a clear definition of what a safe and healthy learning environment is and/or consistently use the "whole child" framework. The lack of clarity will impede efforts to determine what metrics or indicators can best be used to measure if schools are meeting this goal, the type of assessments that will best help schools understand their students' needs, the evidence-based practices needed for improvement and the professional development that educators need.

In addition to offering specific line edits to include a more comprehensive approach to student health and school wellness, HSC recommends the following:

- Section 1.1 Coordination: Include the opportunity to coordinate with the health system, particularly Medicaid for the expansion of school-based health services.
- Section 2.2 Academic Assessments: Develop and implement assessments for health, physical education and social and emotional learning that are aligned with the state's existing standards.
- Section 3.1 Accountability System: Include chronic absenteeism and/or aggregate student fitness scores as the accountability measure for school quality.
- Section 3.1 Statewide Goals to Complement Accountability Framework: Include additional health-related indicators on the school report cards to illustrate various aspects of a healthy school environment.
- Section 3.2 Identification of Schools: Include student health and school wellness assessments to the list of assistance ISBE shall provide to LEAs.
- Section 4: Excellent Educators: Create supportive environments to promote staff wellness and address teacher stress to improve teacher satisfaction and retention.
- 5.1 G. Other state-identified strategies: Require each LEA's plan to include how the LEA will support student access to a healthy school environment as defined by the CDC's "Whole School, Whole Community, Whole Child" model.

Second Draft of the State Plan (PLAN): General Comments

In the cover letter, State Superintendent Smith talks about a "vision that places schools as the centerpiece of growing healthy communities where the needs of the whole child are met." In addition, ISBE states its intention for the PLAN to address the needs of the "whole child" (p. 6). Finally, the PLAN identifies the long-term goal (p. 37) that "every school offers a safe and healthy

learning environment for students.” HSC shares the Superintendent's vision, applauds him for articulating that as a shared goal for the state and appreciates the central positioning of the “whole child” concept in the PLAN.

However, a clear and consistent definition of the “whole child” or “safe and healthy learning environment” is missing from the PLAN. HSC strongly recommends that ISBE establish a clear definition of what a safe and healthy learning environment is and/or consistently use the “whole child” framework. The lack of a clarity will impede efforts to determine what metrics or indicators can best be used to measure if schools are meeting this goal, the type of assessments that will best help schools understand their student’s needs, the evidence-based practices needed for improvement and the professional development that educators need.

HSC defines a healthy school as one that understands and supports students’ well-being and student health as a foundation for learning. In this environment, students have access to good nutrition, physical activity, basic safety, clean air and water and access to care. In addition, students are building the knowledge and skills to make healthy choices that allow them to thrive. A healthy school environment includes promoting positive youth development, cultivating a supportive school climate and providing students with opportunities to connect to one another, adults and the school. Access to care includes physical, behavioral and mental health, as well as dental and vision, and prevention, screening and disease management. In a healthy school, students learn—through lessons and through example—to value their own health.

The Centers for Disease Control and Prevention (CDC) defines the whole child in the context of a [Whole School, Whole Community, Whole Child model](#). This model emphasizes the need to coordinate policy, process and practice to improve learning and health. There are ten elements to this model: Health Education, Physical Education and Physical Activity, Nutrition Environment and Services, Health Services, Consulting, psychological and Social Services, Social and Emotional Climate, Physical Environment, Employee Wellness, Family Engagement and Community Engagement.

While the PLAN does place a strong emphasis on the social and emotional climate, family engagement and community engagement, it does not adequately address many of the other elements of the whole child model—particularly Health Services, Physical Environment, and Employee Wellness. While many of these areas might be included in the needs assessments or in implementation of state supports, given the importance of these issues and schools’ general lack of prioritization these areas, HSC strongly recommends that ISBE explicitly include these issues in the PLAN.

HSC makes specific recommendations for how to integrate a comprehensive approach to student health and school wellness into the PLAN.

Comments on Specific Sections of the PLAN

Section 1.2 Coordination

On page six of the ESSA Illinois State Plan draft #2, the plan says in the first full paragraph, second sentence “In addition to the challenging academic standards and high expectations for student achievement, there needs to be a refocusing on the social, emotional and behavioral needs of students.” HSC recommends adding “physical” so that the end of the sentence reads “social, emotional, physical and behavioral needs of students.”

On page seven of the ESSA Illinois State Plan draft #2, there is a discussion related to the coordination of funding. HSC recommends that the PLAN include the opportunity to coordinate with the health sector to leverage funding opportunities presented by recent changes in the health system including Medicaid to support the delivery of school health services.

Illinois has an important opportunity to expand Medicaid-funded school health services that provide students with access to school health services, including mental health services, for children across the state. This opportunity should be included in the PLAN. Funding for school health services would complement Title I funds for school-wide interventions that support student health. A recent decision by the Centers for Medicare and Medicaid Services, along with the transition of Illinois' Medicaid population to managed care, present two key opportunities for expanding Medicaid-funded school health services in Illinois. Currently, 45.5 percent of Illinois' children, or 1.5 million children, are enrolled in Medicaid. These services could include physical, behavioral and mental, and sexual health services, as well as dental and vision, prevention, screening and disease management. It also could include acute and urgent care as well as case management.

In the summer of 2016, the U.S. Department of Education convened a learning collaborative to assist states in developing state strategies to expand the delivery of health services to Medicaid enrolled students. While Illinois did not participate, there is an opportunity to join. HSC, which is coordinating the technical assistance for this national learning collaborative, is ready and willing to support Illinois in convening a team and developing a strategy.

Section 2: Challenging State Academic Standards and Academic Assessments

2.2 Academic Assessments

Given that Illinois already has standards for social and emotional learning and physical education and health, HSC recommends implementing assessments for these areas.

Developing and implementing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on the effect of instruction on student acquisition of knowledge and skills—based on state standards—will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas. HSC does not recommend that these assessments be used in state accountability systems or in a punitive manner; rather, these assessments should be used to improve teaching and learning in these critical content areas.

State-level assessments of social and emotional learning are still emerging and states and districts are considering how to measure these concepts in ways that are valid, reliable and accurate. As states continue this work, Illinois has the opportunity provide leadership on assessments. As Illinois has led the country on adopting social and emotional learning standards, the state could also be the leader in determining the best methodology for assessing student acquisition of knowledge against these progressive state standards. Examples of how states and districts have assessed social and emotional learning include California's CORE Districts, which have identified ways to assess four key social and emotional indicators. Other states have adopted surveys of school climate, such as the ED School Climate Surveys, which include some questions about social and emotional learning, while some school districts use student-level assessments such as The Search Institute's Developmental Asset Survey, among others.

In regards to assessing PE, states including New Hampshire and Washington have developed guidance for required assessment of students' progress in PE against state standards.

HSC recommends that Section 2.2 F: Grants for State Assessments and Related Activities specifically include developing appropriate assessments for Social and Emotional Learning and Physical Education and Health.

Section 3 Accountability, Support and Improvement For Schools (p. 17 to p. 50)

Section 3.1 Accountability System

HSC recommends the inclusion of two indicators that are a measure of student success and/or school quality: rates of chronic absenteeism and student fitness as measured by FitnessGram. Both of these indicators have a strong correlation with student achievement. The proposed indicators meet the U.S. Department of Education's requirements for these measures, as shown below.

Table1: Proposed Accountability Measures Meet U.S. Department of Education's Proposed Requirements

| | Chronic absenteeism | Physical fitness |
|--------------------------------------------------------------------------------------------------------|---------------------|------------------|
| <i>Is valid, reliable and comparable across all LEAs in the state</i> | ✓ | ✓ |
| <i>Can be disaggregated for each subgroup of students</i> | ✓ | ✓ |
| <i>Includes a different measure than the state uses for any other indicator</i> | ✓ | ✓ |
| <i>Is supported by research finding a connection to student learning</i> | ✓ | ✓ |
| <i>Aids in meaningful differentiation among schools by demonstrating varied results across schools</i> | ✓ | ✓ |

Chronic Absenteeism: Chronic absenteeism—which is commonly defined as missing 10 percent or more of school days for any reason, excused or unexcused—detracts from learning and is a proven early warning sign of academic risk and school dropout. Chronic absence results in decreased literacy and numeracy skills in elementary levels, higher rates of school failure in middle school, high school dropout and lower levels of college completion. In Illinois, about 13 percent of students are chronically absent, with 12 percent of school districts accounting for 75 percent of chronically absent students.

Given the critical link between chronic absenteeism and educational outcomes, HSC recommends that ISBE include rates of chronic absenteeism in its state system as an accountability measure. ISBE should adopt the definition of chronic absenteeism used by the nonprofit Attendance Works, which defines it as missing 10 percent or more of school days, including excused and unexcused absences as well as days missed due to suspensions. Schools are already required to report chronic absenteeism data to the U.S. Department of Education's Office of Civil Rights (OCR) and include information on the school report card. When establishing this indicator, ISBE should consider Connecticut's approach. In Connecticut, schools can receive up to 100 points total for this metric,

with up to 50 points for their overall chronic absenteeism rate and up to 50 points for a high-need subgroup chronic absenteeism rate. Full points are awarded if chronic absenteeism is 5 percent or lower. No points are awarded if the rate is 30 percent or greater. Rates between 30 percent and 5 percent are awarded proportional points. Once ISBE has shared a draft accountability system, HSC will provide specific recommendations for incorporating chronic absenteeism.

Student Fitness: According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being. Physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during and after school to ensure that students are ready to learn.

Given the critical link between physical activity and academic achievement and in light of the recent requirement that school district use FitnessGram assessments to measure student’s progress towards personal fitness, HSC recommends that ISBE includes a metric of student fitness in the accountability system. The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use FitnessGram assessments to measure students’ progress toward the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance and muscular strength. School districts are required to report aggregate data to ISBE by June 1 of each year.

Statewide Goals to Complement Accountability Framework (p. 39)

Metrics required to be included on school report cards can help LEAs and schools tell how they are meeting state goals. HSC recognizes that any data collected should be meaningful to school stakeholders and not overburden schools.

ESSA already requires states that receive Title I funding to include other measures that relate to or inform student attendance: rates of in-school suspensions, out-of-school suspensions and expulsions; school-related arrests and referrals to law enforcement; and incidences of violence, including bullying and harassment. In addition, HSC recommends that the following measures be included to support the state goal of “every school offers a safe and healthy learning environment for all schools”:

- School breakfast participation: When students eat breakfast, they have better attendance rates and improved academic achievement. However, according to the Food Research and Action Center, only about half the number of students who are eligible for free school breakfast actually eat breakfast.¹ School report cards should include the percentage of students eligible for free and reduced school meals, the percentage of students who eat lunch and the percentage of students who eat breakfast at school.
- Integrated Pest Management and Green Cleaning Policy: According to the Environmental Protection Agency, 10.5 million school days are missed each year due to asthma. Maintaining a healthy school environment by eliminating triggers for chronic illnesses such as asthma would positively impact attendance rates.² Report cards should indicate whether

¹ Food Research & Action Center, “Mapping School Breakfast: Participation, Funding, and Growth.” Available at: http://frac.org/frac_map/

² United States Environmental Protection Agency, “Managing Asthma in the School Environment.” Available at: <https://www.epa.gov/iaq-schools/managing-asthma-school-environment>

a school's policies and practices comply with state law related to Integrated Pest Management and green cleaning.

- Ratio of students to school nurses: Research published in the Journal of School Health shows that when students have access to a school nurse, their attendance improves because they are better able to manage chronic illness and can avoid trips to the emergency room.³ This information is already being submitted to the U.S. Department of Education's Office of Civil Rights (OCR).
- Ratio of students to school mental health professionals: Mental health conditions, behavior issues and trauma are all causes of school avoidance and truancy.⁴ This information is already being submitted to OCR.

Illinois currently includes measures related to PE on the school report card, which HSC supports maintaining. HSC recommends that ISBE include additional measures on school report cards which relate to student fitness. Additional measures could include but are not limited to:

- Daily recess offered
- Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- Policies encouraging students to bike or walk to school
- Average class size for PE, by grade
- Number of qualified PE teachers
- Percentage of students granted PE waivers
- Percentage of students with disabilities who participate actively in PE classes
- Percentage of students achieving the Fitnessgram "Healthy Fitness Zone" for each of the required fitness assessment components
- Strength of the district's wellness policy as measured by using the [WELLSAT](#) or similar tool
- Policies against withholding recess or physical activity as a form of punishment

3.2 Identification of Schools and 3.3 State Support and Improvement for Low-Performing Schools

This section of the state plan addresses the type of supports that state will offer LEA's and schools who are in need of comprehensive or targeted support. The plan references IL-EMPOWER. HSC is not familiar with the program and was unable to find any information about the program. However, HSC was able to access some information about the state's Multi-tiered System of Support (MTSS) program. [A review of information available](#) suggests MTSS is limited to addressing student social, emotional and behavioral health. As previously stated, HSC is concerned about this more limited definition of student health and wellness.

In addition to these general comments, HSC recommends the following changes in Section 3: Section 3.1 A. On p. 18, it states that ISBE's vision, mission and goals "describe a system where by children are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college." HSC believes that statement does not adequately reflect the goal that every school offer a safe and healthy learning environment for all

³ "School Nurses' Role in Asthma Management, School Absenteeism, and Cost Savings: A Demonstration Project." Available at: <http://onlinelibrary.wiley.com/doi/10.1111/josh.12102/abstract>

⁴ Upstream Public Health, "The Connection Between Missing School and Health: A Review of Chronic Absenteeism and Student Health in Oregon." Available at: <http://www.attendanceworks.org/wordpress/wp-content/uploads/2014/10/Chronic-Absence-and-Health-Review-10.8.14-FINAL-REVISED.pdf>

students (p.37). HSC suggests that this statement be rewritten to add “have the opportunity to be healthy and developmentally successful” and to read as follows: ISBE’s vision, mission and goals “describe a system where by children have the opportunity to be healthy and developmentally successful and are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college.”

Section 3.3 B. On p. 48, ISBE indicates that they will use 95% of these funds to “provide assistance or conduct needs assessments, curriculum audits, equity audits and other diagnostic support services for LEAs and schools necessary to develop strong comprehensive and targeted improvement plans.” HSC recommends that ISBE add student health and school wellness assessment to the list of types of assistance provided to LEAs and schools.

Section 3.3 D. On p. 49, HSC recommends the explicit inclusion of school health services in ISBE’s review of programmatic resource allocations that ISBE is required to do every three years. This statement “Gaps in the impact of funding supports and services, relative to allocation, for all students, relevant student groups and teachers” should be changed to include “supports and services, including health services.”

Section 4: Support Excellent Educators (p. 50 to 57)

Addressing Teachers Working Conditions: Title II funds can be used by states and school districts to conduct and publicly report on an assessment of educator support and working conditions that would be developed with teachers, leaders, parents, students and the community. For example, Title II funds could be used to develop and conduct an evaluation of teacher stress levels to better understand teachers’ working conditions.

Positive working environments are important for teacher retention and teacher productivity. Additionally, there is a direct link between the well-being of teachers and the educational outcomes of their students. According to a report from Pennsylvania State University and the Robert Wood Johnson Foundation, “elementary school teachers who have greater stress and show more symptoms of depression create classroom environments that are less conducive to learning, which leads to poor academic performance among students.” Effects of teacher stress range from lower scores on math tests to more behavior problems and lower levels of social adjustment and student engagement.

High stress and poor working environments drive many teachers out of the profession. Turnover is most likely to occur in poorly performing schools, which contributes to a long-term destabilization of low-income neighborhood schools. This cycle deepens existing inequities in the school system.

HSC recommends that ISBE includes in the PLAN an assessment of school staff’s working conditions to identify strategies to improve overall working conditions and improve teacher satisfaction, reduce teacher burnout and increase staff retention.

4.2 A. Support for Educators: Resources to Support State-level Strategies (p.52-53)

In the PLAN’s description of state-level strategies to support educators, ISBE proposes a long list of professional learning opportunities for instruction leaders including some issues relating to student health, specifically “trauma and behavioral health issues, restorative practices” as well as developing resources related to “school conditions and school climate.” Student physical health is

not mentioned. Given the rising prevalence of health issues among students, it is important to prepare teachers and principals to identify and address these issues in school. Research indicates that teachers and principals spend an average of one hour per day on student health issues—roughly 180 hours of time per teacher or school leader over the school year—which makes addressing these health issues a firm reality of their jobs.^{5 6}

HSC recommends that the PLAN include a specific mention of student’s physical health and needs. HSC recognizes that teachers and principals should not be required or expected to provide medical care to students. School nurses and other health professionals play an integral role in student health and wellness. Their roles can be supported, reinforced and complemented by teachers and principals who are trained in fostering the connection between health and learning in the classroom. Teachers and school leaders can play a significant role in creating healthy school culture that promote physical activity and nutrition, and should have the appropriate professional learning opportunities available to help them do so.

In addition, the state should support LEA staff and principals on how to promote a healthy school environment. The U.S. EPA has extensive resources and training programs to assist in this type of programming.

4.2 B. Skills to Address Specific Learning Needs. (p. 54)

In this section, the PLAN identifies how the SEA will improve the skills of teachers, principals and other school leaders in identifying students with specific learning needs and providing instruction based on the needs of such students. HSC applauds ISBE for including the need to support educators and others in addressing student behavioral health issues. Given the rising prevalence of student physical health needs, HSC recommends including physical health as well as behavioral health.

Section 5: Supporting All Students (p. 57-108)

5.1 B. Equitable Access to a well-rounded education

In the discussion about how to achieve equitable access to a well-rounded education, the PLAN identifies the factors which can contribute to the conditions for learning. HSC applauds ISBE’s inclusion of “the development of academic, social, emotional, behavioral and physical competencies” (p. 61) and suggests that the “supportive environments” be further defined to be in alignment with the CDC’s definition of a school environment that supports the whole child.

In addition, the discussion about barriers to learning and teaching should include “physical” as well as behavioral “health” (second bullet on the top of p. 61)

5.1 C. School conditions for student learning

The PLAN identified the type of assistance that ISBE will provide to LEA’s to improve the conditions of student health and learning. The PLAN says (p. 62) that “ISBE will support local districts receiving assistance to improve school conditions for student learning by providing professional learning opportunities to work directly with these districts on the implementation of specific evidence-based practices for improved academic, social, emotional, behavioral, and physical

⁵ Hill, N. J., & Hollis, M. (2011). Teacher time spent on student health issues and school nurse presence. *Journal of School Nursing*, 28(3), 181.

⁶ Baisch, M. J., Lundeen, S. P., & Murphy, M. K. (2011). Evidence-based research on the value of school nurses in an urban school system. *Journal of School Health*, 81, 74-80.

student outcomes.” HSC suggests that the final part of the sentence be changed to say “and physical health student outcomes.” The PLAN has a long list of “current professional learning opportunities.” HSC recommends that the PLAN explicitly say that “ISBE will develop and provide additional training to meet the needs of LEAs.”

The paragraph (p. 63) that discusses Title IV, Part A (p. 63) does not include support for student physical health needs.

5.1 G. Other state-identified strategies

In the discussion on p. 68 regarding the plans that LEA’s are required to submit, the PLAN lists the required components that LEA’s must address. HSC recommends that ISBE also require each plan to include how the LEA will support student access to a healthy school environment as defined by the CDC’s Whole Child model.

Conclusion

HSC is grateful for the opportunity to comment on Illinois’ proposed plan to update our state system for educational accountability, school improvement, and educator preparation, support and retention. HSC applauds Illinois’ longstanding commitment to student achievement, health and development and for taking action to support students. We urge you to give student physical health the same attention and priority as is being given to the importance of student’s social and emotional learning and development. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.



December 20, 2016

Dr. Tony Smith
State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street, Suite 4-800
Chicago, IL 60601-3223

RE: Every Student Succeeds Act (ESSA) State Plan

Dear Dr. Smith,

Thank you for the opportunity to comment on the second draft of the Every Student Succeeds Act (ESSA) State Plan. Your organization's efforts to gather input from stakeholders regarding ESSA are an important first step to improving outcomes for students in Illinois public schools.

The Illinois Heartland Library System (IHLS) provides services such as library materials delivery and automation support to 524 member libraries in central and southern Illinois. As a multi-type library system, our largest group of members is school libraries with 233 school districts represented. From the larger library perspective we can confidently attest to the need for and value of highly effective school librarians in our communities.

In the larger context, the school library is part of a continuum of libraries that begins with a partnership with the local public library as an early literacy supporter. Highly effective school librarians reach out to public libraries in their communities to ensure the continuity of service for readers in their charge when schools are not in session. Some communities in our service area do not benefit from both a public and school library, and students are denied constant access to reading materials and other resources.

For example:

>>Dieterich Community Unit #30 is staffed by a highly effective school librarian. There is no public library in the community and the nearest public library is in Effingham, about 11 miles away. The school library has provided limited summer access to students to continue their literacy efforts. The highly effective (and motivated) school librarian makes student reading skills a priority year-round.

As students move forward to public school matriculation, a third type of library often enters their point of view: the academic library. Studies have shown the connection between school

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618-985-3711

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1704 West Interstate Drive
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6725 Goshen Road
Edwardsville, IL 62025
618-656-3216

library effectiveness and higher education achievement. Students who have been the beneficiaries of strong school library programs are better prepared for the rigors of library research required in most institutions (2- and 4-year) of higher education as they are already familiar with research methods. Highly effective school librarians can determine the future course of college-bound high school students.

The communication and interaction of school library staff with their peers in other types of libraries is encouraged by IHLS for several reasons. It furthers the sharing of resources which benefits smaller libraries (especially school and public) in serving their patrons. A highly effective school librarian takes advantage of these opportunities to improve outcomes for those in their charge, and in turn improves the broader library community as well.

We strongly encourage ISBE to:

--Include a definition of library resources in ESSA as the physical and digital materials in the collection as well as the library *staff*. Highly effective school librarians are resources in and of themselves.

--Correct funding disparities in communities to address districts without access to a school library program and/or a highly effective school librarian.

With appreciation for your dedication to and support of our state's children, I thank you for your consideration.

Sincerely,



Leslie M. Bednar

cc: Sandy West, President
IHLS Board of Directors

Patty Fleser, President
Illinois School Library Media Association

Illini West High School District #307

600 Miller Street
Carthage, IL 62321
Phone: (217) 357-9607
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Kim Schilson, Superintendent
Email: schilson.kim@illiniwest.org

To: Illinois State Board of Education

From: Kim Schilson, Superintendent Illini West HSD #307

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways. We know the State of Illinois is ready to be a leader in redefining what it means for high school students to be college, career, and life ready. Adoption of this framework would allow ISBE's fine work to be recognized as the gold standard moving forward.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework.



Comments Regarding ESSA State Plan Draft #2

| | |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Combination of Funding Streams</p> | <p>When the IDEA was initially passed as PL 94-142, Congress promised to fund 40% of the cost of special education. Congress currently funds less than 20% of the cost. Districts in Illinois spend millions of dollars of local revenue annually to offset what was promised by Congress and what is not funded by the state. The IAASE is opposed to “braiding” of IDEA funds if the result will be erosion of dedicated funds for students with disabilities. Specifically, the IAASE is opposed to the use of IDEA funds to create a statewide system of support for schools and LEAs whose improvement plans do not meet minimal quality (p.46). We believe that ESSA Title funds should support ESSA requirements and IDEA funds should support the education of students with disabilities.</p> |
| <p>Academic Assessments</p> | <p>While there are obvious benefits to providing all high school juniors access to a college entrance exam, the move away from PARCC to SAT at the high school level is a step backwards for students with disabilities in terms of access to accommodations. The IAASE urges ISBE to prioritize the needs of students with disabilities at the onset of any assessment decision. It should be required that Universal Design for Learning be incorporated in any state-adopted assessments. If an assessment needs to be retrofitted with accessibility features, it must be done in consultation with members of the field.</p> <p>The ISBE needs to consider innovative assessment strategies that better meet the needs of students with disabilities. The current options of DLM or PARCC/SAT are too restrictive for our students. There is a large group of students with disabilities who do not meet the significant cognitive disability threshold of DLM, but who do not have meaningful participation in the standard assessment, even with accommodations. Special Education teachers across the state share stories of students having behavioral outbursts, crying, refusing, or having similarly negative experiences with the state assessment. As we exit the NCLB era, we must seize the opportunity to offer a better system for our students with disabilities.</p> <p>Because of the difficulty insuring appropriate accommodations for all learners on College Entrance Exams, the IAASE does not support the local choice option allowing districts to choose between them for State Assessment. We believe the focus and resources of the state should be on improving the accommodations available on the assessment that is awarded a contract by the state and that all districts should use that assessment so that all students have access to the same accommodations.</p> |
| <p>Accountability System</p> | <p>The IAASE supports the College and Career Ready Pathways approach presented at the November Board meeting. We believe the College and Career Readiness Framework is unfairly limiting to students with disabilities, is too restrictive, and does not recognize the needs of our schools and our students. We believe the Pathways approach offers options suited to meet the needs of more diverse learners. Further, we support that the data be reported in aggregate and</p> |



not by individual pathway. We believe that reporting the data by pathway could lead to a system that deems one pathway superior to the other and that is not the intent of this model.

As ISBE considers the accountability system, the IAASE urges Illinois not to repeat the errors of the previous system. The students with disabilities subgroup was often the first in a school not to make AYP and was “blamed” for a schools “failure”. Appropriate accommodations for these students must be embedded in all facets of the ESSA plan. There is no mention of students with significant cognitive disabilities in the accountability section of Draft #2. Is ISBE proposing yet another system in which students with disabilities will be perceived as “hurting” schools in their efforts to be successful within the state accountability system? We believe this concern requires serious consideration. IAASE is willing to work with ISBE to develop potential solutions to what we view as a significant weakness in the plan. For example, members of one Illinois cooperative have suggested indicators for career readiness for students with moderate/significant cognitive disabilities should center on 3 components: 1) Individualized Learning Plans; 2) DLM Essential Elements; and 3) Pre Employment Transition Services. This is information IAASE would like to share with ISBE and collaborate on so that it can be included in Draft #3.

When considering growth within the subgroup of students with disabilities, it is important to recognize the nature of special education eligibility. When students reach grade level performance or the deficit has been remediated, they are often dismissed from services and no longer eligible for special education. Therefore, students who show significant growth are removed from the subgroup. The IAASE is opposed to a model that has the unintended consequence of influencing IEP teams to continue eligibility for high performing students because of the benefit to the subgroup.

The IAASE believe that a subgroup size of 20 is too small and will result in less precise data. We believe that 30 is a more appropriate number for the subgroup size as it the number generally considered the minimum sample size for statistical analysis.

Student group performance on relevant indicators should not be compared to state averages for “all students,” but rather to the comparable student group.

When measuring growth, the model and tools we use must be sensitive enough to show smaller increments of growth for specific cohorts of students who grow in smaller increments.

A subset of students with disabilities access high school programs until the day before their 22nd birthday. The high school graduation rate calculation must capture these students in a way that does not penalize schools for providing services they are legally obligated to provide.



Accurate Identification of English Learners and Children with Disabilities

The IAASE supports accurate identification of English Learners and children with disabilities and wants to make sure that students with language-based disabilities are not disproportionately identified for EL services. Specifically, we note that Illinois plans to continue identifying ELs in Kindergarten based on evidence about whether or not a child can *spea*k English. Other kindergarten domains are based on what a child hears. However, for children with speech/language disabilities, hearing disabilities, or autism, speaking or hearing in English or their native language might not be possible at all. We encourage ISBE to work with the WIDA consortium to identify more holistic methods of examining ELs that will not unfairly penalize or over-identify students with disabilities. Methods for evaluating students on the autism spectrum have included non-verbal measures.

In this section, it states that:

"Every Individualized Education Program team will include a qualified bilingual specialist/dual language teacher able to address the child's language or cultural factors as they relate to English Learners' needs AND an interpreter, for parents who are limited English proficient, who is competent and knowledgeable in both languages and key specialized terms and concepts."

At several different points throughout the draft, it is noted that there will be a braiding of Title dollars with other federal dollars. It is our assertion that the braiding of dollars would need to occur in a significant way here to assure that IEP teams are prepared with the practices that will support this approach to working with families. Simply adding this to the requirements of school IEP teams without any additional funding through Title II or Title III for professional development of IEP teams or hiring of additional staff would not allow for these plans to be possible or successful. Further, there must be a central bank of interpreters in multiple languages available to school IEP teams if this is going to be possible or successful.



Leadership Council

Active Transportation Alliance
American Association of Retired Persons (AARP)
Illinois
American Cancer Society, Illinois Division
American Heart Association, Midwest Affiliate
American Lung Association of Illinois
American Medical Association
Blue Cross Blue Shield of Illinois
Building a Healthier Chicago
Chicago Department of Public Health
Chicago Hispanic Health Coalition
Consortium to Lower Obesity in Chicago
Children (CLOCC)
Cook County Department of Public Health
DuPage County FORWARD Initiative
Heartland Human Care Services
Illinois Academy of Family Physicians
Illinois Action for Children
Illinois African American Coalition for
Prevention
Illinois Association for Health, Physical
Education, Recreation and Dance
Illinois Association of School Nurses
Illinois Association of Public Health
Administrators
Illinois Chapter, American Academy of Pediatrics
Illinois Dietetic Association
Illinois Department of Public Health
Illinois Hospital Association
Illinois Local Food & Farm Coalition
Illinois Maternal and Child Health Coalition
Illinois Public Health Association
Illinois Public Health Institute
Illinois State Alliance of YMCAs
Midwest Business Group on Health
Northern Illinois Public Health Consortium
Ounce of Prevention Fund
Salud Latina/Latino Health
Southern Illinois Healthcare
University of Illinois at Chicago Health Policy
Center
University of Illinois at Chicago School of Public
Health
Voices for Illinois Children
YMCA of Metropolitan Chicago

Convened by

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December 20, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #2

Dear Dr. Smith,

Thank you for the opportunity to respond to the second draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

The Illinois Alliance to Prevent Obesity (IAPO) is a statewide coalition of over 140 organizations working to reduce obesity trends in Illinois by 2018 through comprehensive policy, systems, and environmental change strategies and interventions as outlined in the coalition's State Action Roadmap. Several of IAPO's long-term goals align with ESSA's recognition of the need for schools to support the whole child, specifically the importance of promoting physical and mental health and wellness, including:

- Implementing nutrition standards for school meals and competitive foods in all Illinois schools and after-school programs.
- Supporting initiatives to integrate physical activity into the school day, including daily high-quality enhanced physical education, daily recess, classroom education that includes physical activity, and extracurricular physical activity programs.

The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning.

In our response to this draft, IAPO provides additional recommendations to the Illinois State Board of Education (ISBE) on improving the revised draft plan, responds to questions raised in the plan, and provides supplemental background information to justify our recommendations. Additional information is available upon request.

As we said in our previous comments, ISBE has recognized the connection between student health and education and has taken action to support social and emotional learning, physical health, improved attendance and forward-thinking discipline practices. However, the proposed plan could further prioritize and highlight the importance of key issues such as student physical health and school facilities and their impact on achievement. Throughout the comments below, we provide recommendations that more fully address physical health so that students are in school and ready to learn. In addition, we make suggestions on how to encourage schools to create a healthy school environment. We encourage Illinois to fully embrace the whole child framework and create a national model for integrating health and wellness into its accountability systems, report cards, needs assessments and professional development.

(Over, please)

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,

A handwritten signature in black ink, appearing to read "Elissa Bassler". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elissa Bassler
CEO
Illinois Public Health Institute

Executive Summary

The Every Student Succeeds Act (ESSA) presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting the physical and mental health and wellness of students.

Illinois has already made a commitment to address the whole child. One of the state's goals is for every school to offer a safe and healthy learning environment for students. In the 2nd Draft State ESSA Plan (PLAN), ISBE clearly states its intention for the PLAN to address the "whole child". And, in many places, the PLAN does address the need to support student health and wellness, but emphasizes social and emotional learning and school climate, family engagement and community engagement. The PLAN does not adequately address many of the other elements important so that students are healthy and ready to learn.

IAPO strongly recommends that ISBE establish a clear definition of what a safe and healthy learning environment is and/or consistently use the "whole child" framework. The lack of clarity will impede efforts to determine what metrics or indicators can best be used to measure if schools are meeting this goal, the type of assessments that will best help schools understand their students' needs, the evidence-based practices needed for improvement and the professional development that educators need.

In addition to offering specific line edits to include a more comprehensive approach to student health and school wellness, IAPO recommends the following:

- Section 1.1 Coordination: Include the opportunity to coordinate with the health system, particularly Medicaid for the expansion of school-based health services.
- Section 2.2 Academic Assessments: Develop and implement assessments for health, physical education and social and emotional learning that are aligned with the state's existing standards.
- Section 3.1 Accountability System: Include chronic absenteeism and/or aggregate student fitness scores as the accountability measure for school quality.
- Section 3.1 Statewide Goals to Complement Accountability Framework: Include additional health-related indicators on the school report cards to illustrate various aspects of a healthy school environment.
- Section 3.2 Identification of Schools: Include student health and school wellness assessments to the list of assistance ISBE shall provide to LEAs.
- Section 4: Excellent Educators: Create supportive environments to promote staff wellness and address teacher stress to improve teacher satisfaction and retention.
- 5.1 G. Other state-identified strategies: Require each LEA's plan to include how the LEA will support student access to a healthy school environment as defined by the CDC's "Whole School, Whole Community, Whole Child" model.

Second Draft of the State Plan (PLAN): General Comments

In the cover letter, State Superintendent Smith talks about a "vision that places schools as the centerpiece of growing healthy communities where the needs of the whole child are met." In addition, ISBE states its intention for the PLAN to address the needs of the "whole child" (p. 6). Finally, the PLAN identifies the long-term goal (p. 37) that "every school offers a safe and healthy learning environment for students." IAPO shares the Superintendent's vision, applauds him for articulating that as a shared goal for the state and appreciates the central positioning of the "whole child" concept in the PLAN.

However, a clear and consistent definition of the “whole child” or “safe and healthy learning environment” is missing from the PLAN. IAPO strongly recommends that ISBE establish a clear definition of what a safe and healthy learning environment is and/or consistently use the “whole child” framework. The lack of a clarity will impede efforts to determine what metrics or indicators can best be used to measure if schools are meeting this goal, the type of assessments that will best help schools understand their student’s needs, the evidence-based practices needed for improvement and the professional development that educators need.

IAPO defines a healthy school as one that understands and supports students’ well-being and student health as a foundation for learning. In this environment, students have access to good nutrition, physical activity, basic safety, clean air and water and access to care. In addition, students are building the knowledge and skills to make healthy choices that allow them to thrive. A healthy school environment includes promoting positive youth development, cultivating a supportive school climate and providing students with opportunities to connect to one another, adults and the school. Access to care includes physical, behavioral and mental health, as well as dental and vision, and prevention, screening and disease management. In a healthy school, students learn—through lessons and through example—to value their own health.

The Centers for Disease Control and Prevention (CDC) defines the whole child in the context of a [Whole School, Whole Community, Whole Child model](#). This model emphasizes the need to coordinate policy, process and practice to improve learning and health. There are ten elements to this model: Health Education, Physical Education and Physical Activity, Nutrition Environment and Services, Health Services, Consulting, psychological and Social Services, Social and Emotional Climate, Physical Environment, Employee Wellness, Family Engagement and Community Engagement.

While the PLAN does place a strong emphasis on the social and emotional climate, family engagement and community engagement, it does not adequately address many of the other elements of the whole child model—particularly Health Services, Physical Environment, and Employee Wellness. While many of these areas might be included in the needs assessments or in implementation of state supports, given the importance of these issues and schools’ general lack of prioritization these areas, IAPO strongly recommends that ISBE explicitly include these issues in the PLAN.

IAPO makes specific recommendations for how to integrate a comprehensive approach to student health and school wellness into the PLAN.

Comments on Specific Sections of the PLAN

Section 1.2 Coordination

On page six of the ESSA Illinois State Plan draft #2, the plan says in the first full paragraph, second sentence “In addition to the challenging academic standards and high expectations for student achievement, there needs to be a refocusing on the social, emotional and behavioral needs of students.” IAPO recommends adding “physical” so that the end of the sentence reads “social, emotional, physical and behavioral needs of students.”

On page seven of the ESSA Illinois State Plan draft #2, there is a discussion related to the coordination of funding. IAPO recommends that the PLAN include the opportunity to coordinate with the health sector to leverage funding opportunities presented by recent changes in the health system including Medicaid to support the delivery of school health services.

Illinois has an important opportunity to expand Medicaid-funded school health services that provide students with access to school health services, including mental health services, for children across the state. This opportunity should be included in the PLAN. Funding for school health services would complement Title I funds for school-wide interventions that support student health. A recent decision by the Centers for Medicare and Medicaid Services, along with the transition of Illinois' Medicaid population to managed care, present two key opportunities for expanding Medicaid-funded school health services in Illinois. Currently, 45.5 percent of Illinois' children, or 1.5 million children, are enrolled in Medicaid. These services could include physical, behavioral and mental, and sexual health services, as well as dental and vision, prevention, screening and disease management. It also could include acute and urgent care as well as case management.

In the summer of 2016, the U.S. Department of Education convened a learning collaborative to assist states in developing state strategies to expand the delivery of health services to Medicaid enrolled students. While Illinois did not participate, there is an opportunity to join. IAPO, which is coordinating the technical assistance for this national learning collaborative, is ready and willing to support Illinois in convening a team and developing a strategy.

Section 2: Challenging State Academic Standards and Academic Assessments

2.2 Academic Assessments

Given that Illinois already has standards for social and emotional learning and physical education (PE) and health, IAPO recommends implementing assessments for these areas.

Developing and implementing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on the effect of instruction on student acquisition of knowledge and skills—based on state standards—will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas. IAPO does not recommend that these assessments be used in state accountability systems or in a punitive manner; rather, these assessments should be used to improve teaching and learning in these critical content areas.

State-level assessments of social and emotional learning are still emerging and states and districts are considering how to measure these concepts in ways that are valid, reliable and accurate. As states continue this work, Illinois has the opportunity provide leadership on assessments. As Illinois has led the country on adopting social and emotional learning standards, the state could also be the leader in determining the best methodology for assessing student acquisition of knowledge against these progressive state standards. Examples of how states and districts have assessed social and emotional learning include California's CORE Districts, which have identified ways to assess four key social and emotional indicators. Other states have adopted surveys of school climate, such as the ED School Climate Surveys, which include some questions about social and emotional learning, while some school districts use student-level assessments such as The Search Institute's Developmental Asset Survey, among others.

In regards to assessing PE, states including New Hampshire and Washington have developed guidance for required assessment of students' progress in PE against state standards.

IAPO recommends that Section 2.2 F: Grants for State Assessments and Related Activities specifically include developing appropriate assessments for Social and Emotional Learning and Physical Education

and Health.

Section 3 Accountability, Support and Improvement For Schools (p. 17 to p. 50)

Section 3.1 Accountability System

IAPO recommends the inclusion of two indicators that are a measure of student success and/or school quality: rates of chronic absenteeism and student fitness as measured by FitnessGram. Both of these indicators have a strong correlation with student achievement. The proposed indicators meet the U.S. Department of Education’s requirements for these measures, as shown below.

Table1: Proposed Accountability Measures Meet U.S. Department of Education’s Proposed Requirements

| | Chronic absenteeism | Physical fitness |
|--------------------------------------------------------------------------------------------------------|---------------------|------------------|
| <i>Is valid, reliable and comparable across all LEAs in the state</i> | ✓ | ✓ |
| <i>Can be disaggregated for each subgroup of students</i> | ✓ | ✓ |
| <i>Includes a different measure than the state uses for any other indicator</i> | ✓ | ✓ |
| <i>Is supported by research finding a connection to student learning</i> | ✓ | ✓ |
| <i>Aids in meaningful differentiation among schools by demonstrating varied results across schools</i> | ✓ | ✓ |

Chronic Absenteeism: Chronic absenteeism—which is commonly defined as missing 10 percent or more of school days for any reason, excused or unexcused—detracts from learning and is a proven early warning sign of academic risk and school dropout. Chronic absence results in decreased literacy and numeracy skills in elementary levels, higher rates of school failure in middle school, high school dropout and lower levels of college completion. In Illinois, about 13 percent of students are chronically absent, with 12 percent of school districts accounting for 75 percent of chronically absent students.

Given the critical link between chronic absenteeism and educational outcomes, IAPO recommends that ISBE include rates of chronic absenteeism in its state system as an accountability measure. ISBE should adopt the definition of chronic absenteeism used by the nonprofit Attendance Works, which defines it as missing 10 percent or more of school days, including excused and unexcused absences as well as days missed due to suspensions. Schools are already required to report chronic absenteeism data to the U.S. Department of Education’s Office of Civil Rights (OCR) and include information on the school report card. When establishing this indicator, ISBE should consider Connecticut’s approach. In Connecticut, schools can receive up to 100 points total for this metric, with up to 50 points for their overall chronic absenteeism rate and up to 50 points for a high-need subgroup chronic absenteeism rate. Full points are awarded if chronic absenteeism is 5 percent or lower. No points are awarded if the rate is 30 percent or greater. Rates between 30 percent and 5 percent are awarded proportional points. Once ISBE has shared a draft accountability system, IAPO will provide specific recommendations for incorporating chronic absenteeism.

Student Fitness: According to the Physical Activity Guidelines for Americans, children require 60

minutes of physical activity daily for optimum health and well-being. Physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during and after school to ensure that students are ready to learn.

Given the critical link between physical activity and academic achievement and in light of the recent requirement that school district use FitnessGram assessments to measure student's progress towards personal fitness, IAPO recommends that ISBE includes a metric of student fitness in the accountability system. The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use FitnessGram assessments to measure students' progress toward the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance and muscular strength. School districts are required to report aggregate data to ISBE by June 1 of each year.

Statewide Goals to Complement Accountability Framework (p. 39)

Metrics required to be included on school report cards can help LEAs and schools tell how they are meeting state goals. IAPO recognizes that any data collected should be meaningful to school stakeholders and not overburden schools.

ESSA already requires states that receive Title I funding to include other measures that relate to or inform student attendance: rates of in-school suspensions, out-of-school suspensions and expulsions; school-related arrests and referrals to law enforcement; and incidences of violence, including bullying and harassment. In addition, IAPO recommends that the following measures be included to support the state goal of "every school offers a safe and healthy learning environment for all schools":

- School breakfast participation: When students eat breakfast, they have better attendance rates and improved academic achievement. However, according to the Food Research and Action Center, only about half the number of students who are eligible for free school breakfast actually eat breakfast.¹ School report cards should include the percentage of students eligible for free and reduced school meals, the percentage of students who eat lunch and the percentage of students who eat breakfast at school.
- Integrated Pest Management and Green Cleaning Policy: According to the Environmental Protection Agency, 10.5 million school days are missed each year due to asthma. Maintaining a healthy school environment by eliminating triggers for chronic illnesses such as asthma would positively impact attendance rates.² Report cards should indicate whether a school's policies and practices comply with state law related to Integrated Pest Management and green cleaning.
- Ratio of students to school nurses: Research published in the Journal of School Health shows that when students have access to a school nurse, their attendance improves because they are better able to manage chronic illness and can avoid trips to the emergency room.³ This information is already being submitted to the U.S. Department of Education's Office of Civil Rights (OCR).

¹ Food Research & Action Center, "Mapping School Breakfast: Participation, Funding, and Growth." Available at: http://frac.org/frac_map/

² United States Environmental Protection Agency, "Managing Asthma in the School Environment." Available at: <https://www.epa.gov/iaq-schools/managing-asthma-school-environment>

³ "School Nurses' Role in Asthma Management, School Absenteeism, and Cost Savings: A Demonstration Project." Available at: <http://onlinelibrary.wiley.com/doi/10.1111/josh.12102/abstract>

- Ratio of students to school mental health professionals: Mental health conditions, behavior issues and trauma are all causes of school avoidance and truancy.⁴ This information is already being submitted to OCR.

Illinois currently includes measures related to PE on the school report card, which IAPO supports maintaining. IAPO recommends that ISBE include additional measures on school report cards which relate to student fitness. Additional measures could include but are not limited to:

- Daily recess offered
- Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- Policies encouraging students to bike or walk to school
- Average class size for PE, by grade
- Number of qualified PE teachers
- Percentage of students granted PE waivers
- Percentage of students with disabilities who participate actively in PE classes
- Percentage of students achieving the Fitnessgram “Healthy Fitness Zone” for each of the required fitness assessment components
- Strength of the district’s wellness policy as measured by using the [WELLSAT](#) or similar tool
- Policies against withholding recess or physical activity as a form of punishment

3.2 Identification of Schools and 3.3 State Support and Improvement for Low-Performing Schools

This section of the state plan addresses the type of supports that state will offer LEA’s and schools who are in need of comprehensive or targeted support. The plan references IL-EMPOWER. IAPO is not familiar with the program and was unable to find any information about the program. However, IAPO was able to access some information about the state's Multi-tiered System of Support (MTSS) program. [A review of information available](#) suggests MTSS is limited to addressing student social, emotional and behavioral health. As previously stated, IAPO is concerned about this more limited definition of student health and wellness.

In addition to these general comments, IAPO recommends the following changes in Section 3: Section 3.1 A. On p. 18, it states that ISBE’s vision, mission and goals “describe a system where by children are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college.” IAPO believes that statement does not adequately reflect the goal that every school offer a safe and healthy learning environment for all students (p.37). IAPO suggests that this statement be rewritten to add “have the opportunity to be healthy and developmentally successful” and to read as follows: ISBE’s vision, mission and goals “describe a system where by children have the opportunity to be healthy and developmentally successful and are able to develop their interests, talents, and sense of self supported by schools and communities. Every child in the public school systems in Illinois deserves to attend a school where in she or he is prepared to enter the workforce or college.”

Section 3.3 B. On p. 48, ISBE indicates that they will use 95% of these funds to “provide assistance or conduct needs assessments, curriculum audits, equity audits and other diagnostic support services for LEAs and schools necessary to develop strong comprehensive and targeted improvement plans.” IAPO

⁴ Upstream Public Health, “The Connection Between Missing School and Health: A Review of Chronic Absenteeism and Student Health in Oregon.” Available at: <http://www.attendanceworks.org/wordpress/wp-content/uploads/2014/10/Chronic-Absence-and-Health-Review-10.8.14-FINAL-REVISED.pdf>

recommends that ISBE add student health and school wellness assessment to the list of types of assistance provided to LEAs and schools.

Section 3.3 D. On p. 49, IAPO recommends the explicit inclusion of school health services in ISBE’s review of programmatic resource allocations that ISBE is required to do every three years. This statement “Gaps in the impact of funding supports and services, relative to allocation, for all students, relevant student groups and teachers” should be changed to include “supports and services, including health services.”

Section 4: Support Excellent Educators (p. 50 to 57)

Addressing Teachers Working Conditions: Title II funds can be used by states and school districts to conduct and publicly report on an assessment of educator support and working conditions that would be developed with teachers, leaders, parents, students and the community. For example, Title II funds could be used to develop and conduct an evaluation of teacher stress levels to better understand teachers’ working conditions.

Positive working environments are important for teacher retention and teacher productivity. Additionally, there is a direct link between the well-being of teachers and the educational outcomes of their students. According to a report from Pennsylvania State University and the Robert Wood Johnson Foundation, “elementary school teachers who have greater stress and show more symptoms of depression create classroom environments that are less conducive to learning, which leads to poor academic performance among students.” Effects of teacher stress range from lower scores on math tests to more behavior problems and lower levels of social adjustment and student engagement.

High stress and poor working environments drive many teachers out of the profession. Turnover is most likely to occur in poorly performing schools, which contributes to a long-term destabilization of low-income neighborhood schools. This cycle deepens existing inequities in the school system.

IAPO recommends that ISBE includes in the PLAN an assessment of school staff’s working conditions to identify strategies to improve overall working conditions and improve teacher satisfaction, reduce teacher burnout and increase staff retention.

4.2 A. Support for Educators: Resources to Support State-level Strategies (p.52-53)

In the PLAN’s description of state-level strategies to support educators, ISBE proposes a long list of professional learning opportunities for instruction leaders including some issues relating to student health, specifically “trauma and behavioral health issues, restorative practices” as well as developing resources related to “school conditions and school climate.” Student physical health is not mentioned. Given the rising prevalence of health issues among students, it is important to prepare teachers and principals to identify and address these issues in school. Research indicates that teachers and principals spend an average of one hour per day on student health issues—roughly 180 hours of time per teacher or school leader over the school year—which makes addressing these health issues a firm reality of their jobs.^{5 6}

IAPO recommends that the PLAN include a specific mention of student’s physical health and needs.

⁵ Hill, N. J., & Hollis, M. (2011). Teacher time spent on student health issues and school nurse presence. *Journal of School Nursing, 28*(3), 181.

⁶ Baisch, M. J., Lundeen, S. P., & Murphy, M. K. (2011). Evidence-based research on the value of school nurses in an urban school system. *Journal of School Health, 81*, 74-80.

IAPO recognizes that teachers and principals should not be required or expected to provide medical care to students. School nurses and other health professionals play an integral role in student health and wellness. Their roles can be supported, reinforced and complemented by teachers and principals who are trained in fostering the connection between health and learning in the classroom. Teachers and school leaders can play a significant role in creating healthy school culture that promote physical activity and nutrition, and should have the appropriate professional learning opportunities available to help them do so.

In addition, the state should support LEA staff and principals on how to promote a healthy school environment. The U.S. EPA has extensive resources and training programs to assist in this type of programming.

4.2 B. Skills to Address Specific Learning Needs. (p. 54)

In this section, the PLAN identifies how the SEA will improve the skills of teachers, principals and other school leaders in identifying students with specific learning needs and providing instruction based on the needs of such students. IAPO applauds ISBE for including the need to support educators and others in addressing student behavioral health issues. Given the rising prevalence of student physical health needs, IAPO recommends including physical health as well as behavioral health.

Section 5: Supporting All Students (p. 57-108)

5.1 B. Equitable Access to a well-rounded education

In the discussion about how to achieve equitable access to a well-rounded education, the PLAN identifies the factors which can contribute to the conditions for learning. IAPO applauds ISBE's inclusion of "the development of academic, social, emotional, behavioral and physical competencies" (p. 61) and suggests that the "supportive environments" be further defined to be in alignment with the CDC's definition of a school environment that supports the whole child.

In addition, the discussion about barriers to learning and teaching should include "physical" as well as behavioral "health" (second bullet on the top of p. 61)

5.1 C. School conditions for student learning

The PLAN identified the type of assistance that ISBE will provide to LEA's to improve the conditions of student health and learning. The PLAN says (p. 62) that "ISBE will support local districts receiving assistance to improve school conditions for student learning by providing professional learning opportunities to work directly with these districts on the implementation of specific evidence-based practices for improved academic, social, emotional, behavioral, and physical student outcomes." IAPO suggests that the final part of the sentence be changed to say "and physical health student outcomes." The PLAN has a long list of "current professional learning opportunities." IAPO recommends that the PLAN explicitly say that "ISBE will develop and provide additional training to meet the needs of LEAs."

The paragraph (p. 63) that discusses Title IV, Part A (p. 63) does not include support for student physical health needs.

5.1 G. Other state-identified strategies

In the discussion on p. 68 regarding the plans that LEA's are required to submit, the PLAN lists the required components that LEA's must address. IAPO recommends that ISBE also require each plan to include how the LEA will support student access to a healthy school environment as defined by the CDC's Whole Child model.

Conclusion

IAPO is grateful for the opportunity to comment on Illinois' proposed plan to update our state system for educational accountability, school improvement, and educator preparation, support and retention. IAPO applauds Illinois' longstanding commitment to student achievement, health and development and for taking action to support students. We urge you to give student physical health the same attention and priority as is being given to the importance of student's social and emotional learning and development. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.

December 27, 2016

Dear State Superintendent Smith:

The following are recommendations for the state's ESSA draft plan that were approved by the Illinois Advisory Council for Bilingual Education (IACBE) at two meetings including Nov 30 and Dec 9 2016. Since the late fall, IACBE has met several times to discuss various aspects of the state's plan including with WIDA Consortium Executive Director Tim Boals and staffer Kristopher Stewart to discuss ACCESS for ELs.

Please note that there are four ESSA recommendations approved at these meeting related to the state plan. Page citations are also included.

1) ESSA draft plan, pages 12-13 regarding English Language Proficiency Assessment

RECOMMENDATION: To change the ACCESS for ELs reclassification (exit) score to 5.0 composite to be implemented for the 2017-18 school year, and to study ACCESS for ELs results on a yearly basis to ensure that the recommendation is sound.

Note that the WIDA Consortium is discouraging states from utilizing individual domain cut-offs, such as in Reading and Writing to be used for reclassification purposes.

2) ESSA draft plan, pages 28-29 regarding Growth to Proficiency model

RECOMMENDATION: To support a Growth to Proficiency Model for ACCESS for ELs, which is part of K-2 accountability, with a 5 year time table beginning in 1st grade, with 20% of that figure for achieving proficiency of 5.0, and 80% to be on growth to proficiency (that is, more emphasis on growth rather than proficiency).

RECOMMENDATION: To also support a Growth to Proficiency Model for academic content assessments (e.g. PARCC and SAT), using the same 80/20 model as described in the previous Recommendation , with 80% emphasis on growth, and 20% emphasis on proficiency.

3) ESSA draft plan, pages 33-34 regarding Weighting of Indicators

RECOMMENDATION: The 70%/30% weighting of indicators is NOT recommended. IACBE does not take a position regarding the 60%/40% versus the 51%/49% weighting of indicators. Additionally, since there is flexibility in the projected pathways, the State Seal of Biliteracy should be explicitly included as a part of the pathways.

If there are any further questions, IACBE members would be happy to discuss these recommendations in more detail.

Wishing you much success in this enormous endeavor!

Sincerely,

A handwritten signature in black ink that reads "Josie Yanguas". The signature is written in a cursive, flowing style.

Josie Yanguas, Chairperson
IL Advisory Council for Bilingual Education
773 791 8704 cell



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December 27, 2016

To the Illinois State Board of Education,

The members of the Illinois Association of School Social Workers have reviewed the ESSA Draft Plan #2 for Illinois and attended various public meetings regarding the legislation. We have concerns and questions, that we would like clarification as well as recommendations before the plan is officially accepted by legislators. School Social Workers across Illinois have varied roles based on the needs of their school and district. As stated in a previous email communication School Social Workers are involved with Family Engagements, Early Childhood, School Climate, Homeless and Foster Care Youth, English Language Learners and Special Education Evaluations. We believe that our questions and recommendations will assist in making the ESSA an easy transition for educators in the state of Illinois.

We have organized our concerns and suggestions by page number.

Page 4: In the middle of the page under "Title II Funding", where it talks about "focus attention/resources on early grades..." it mentions "an assessment for health, PE, and socio emotional learning, etc. We would like to know whether the word "assessment" means a full evaluation or a screening. We feel that the use of the term "assessment" is unclear, and perhaps it should be replaced with the word "screening". There are a variety of SEL screening tools available and School Social Workers and other professionals can administer those screenings.

Page 19: Item #19 should include student –school social worker ratio as an indicator of the school climate. The Illinois Association of School Social Workers and The School Social Worker Association of America have suggested recommendations for school districts and state boards of education.

Page 60: Top paragraph line 2, where it says "educators, counselors, behavioral health staff..." Should insert "school social workers after "educators". It is unclear what was meant by "behavioral health staff"(because the common understanding is that it includes school social workers, school counselors, and school psychologists). In general, the term "behavioral health" in the school context is unclear.

Page 61: In the middle paragraph that starts with "Barriers to learning...", last line of the paragraph it refers to "behavioral health supports in the school environment(counselors or social workers)" , it should say "school social workers". School social workers serve as the primary mental health providers for students and may be the only counseling professionals available to students and their families to initially identify and provide interventions for those issues. (Early&Vonk, 2001; Hennessy & Green-Hennessy, 2000; Kelly, Berzin, et al., 2010). School social workers have master's degrees in social work. We have special expertise in understanding



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family and community systems and linking students and their families with community services essential to promote student success. School social workers' training includes specialized preparation in cultural diversity, systems theory, social justice, risk assessment and intervention, consultation and collaboration, and clinical intervention strategies to address the mental health needs of students. We work to remedy barriers to learning created as a result of poverty, inadequate health care, and neighborhood violence.

Page 62: Approximately half-way down the page where it says "ISBE will support local districts" and refers to "professional learning opportunities": We feel that it should say that school support personnel are resources to provide learning opportunities for other school staff in the areas of social-emotional learning, functional behavioral analysis and positive behavioral intervention.

Page 69: The second paragraph in red that begins: "ISBE will use Title IV Part A funds": Third line where it says "school-based counseling" it should also say "school social work". This sentence also uses the term "behavioral health programs" and it is unclear exactly what this refers to or what it means.

Page 69: Under "State Use of Funds", fifth line down, after "counselors", it should say school social workers. (Same rationale as on p. 61)

As an organization we support the ESSA; however we want the services to be clear for educators and the families we serve. We also support the use of the PBIS program and endorse its inclusion in the plan, as PBIS typically utilizes school social worker services to address bullying and other behavioral issues.

Respectfully,

Tamara C Butler
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December 27, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #2

Dear Dr. Smith,

Thank you for the opportunity to respond to the second draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

The Illinois Association of School Nurses (IASN) is a professional membership organization of school nurses (Registered Nurses) in Illinois. The organization represents nurses who hold ISBE Professional Educator License, endorsed in school nursing, as well as nurses who do not hold that ISBE issued license. The IASN promotes wellness and educational success of school communities by supporting, developing, and advocating for professional school nurse leaders. Each of our members is dedicated to supporting the whole child within the whole school and whole community, utilizing the Centers for Disease Control (CDC) model of Whole School, Whole Community, Whole Child ([Whole School, Whole Community, Whole Child model](#)). We believe in the statement of Dr. Joycelyn Elders that we "can't educate children who are not healthy, and we can't keep them healthy if they're not educated." School nurses form the bridge between health and education.

The attention to behavioral and mental health among students in the current draft is sufficient in breadth but insufficient in depth. School nurses identify, refer, and often treat students with mental and emotional health issues. One study indicates that 70 percent of adolescent mental health services are provided in schools, with school nurses often being the initiator of referrals to services and the professionals who not only administer medications for behavioral and mental health issues but communicate with the parents and physicians as to the effectiveness of those medications and monitor for their potential side effects.

The current draft also gives little attention to physical health of the student. It is because of these gaps in the current draft that IASN wishes to recommend these additional statements or areas of focus:

1. Attention to the role of the school nurse (RN) among the student support services that are identified in the draft. We recognize and applaud the reference to school nurses in the Climate section #19 (student to nurse ratio). However, there are several other areas of the document where the school nurse practitioner is missing. Particularly in regards to the more than 1,000 Illinois school RNs who also hold the ISBE issued PEL in school nursing, we request that wherever student support personnel are mentioned, that school nurse is included. For example, page 63, barriers to learning, lists counselors and social workers as those staff who are insufficient in number to address the barriers, and does not

mention the nurses, who are quite involved in the barriers described, particularly absenteeism. Research indicates that a major cause of absenteeism is poor health in the student or in a family member for whom the student is often called upon to care for, so that other adults in the family may obtain income through employment. On page 69, “enough counselors, social workers, special educational personnel” must include school nurses, who also foster safe and healthy school environments. On page 107, the reference to caring to the needs of neglected students should mention the school nurse as well as the other support personnel. School nurses represent a large proportion of calls to child abuse and neglect hotlines, being often the first to identify not only abuse but medical and physical neglect.

2. In the current draft, we recommend that ISBE further highlight the importance of student physical health and school facilities and their impact on attendance and achievement. We recommend that in any sentence referring to mental and behavioral health, “physical health” be inserted. Nurses attend to the “whole child” or patient in any care setting, providing both physical health support and behavioral health support. To disassociate behavioral health from physical health is not only impractical but also inconsistent with the science of the mind and body connection.
3. Include nurse to student ratio (using Full Time Equivalency – FTE – for consistency) in any school, district, or state accountability systems, report cards or needs assessments. This indicator is necessary due to the high numbers of students who come from families with no consistent health care provider. The school RN is often the only health care provider a student may see for health conditions that may reduce absences and increase health.
4. On page 68, the draft mentions that parents will be informed of how many teachers have not reached highly qualified status but are still teaching their students. Likewise, school districts should need to report to their stakeholders and community how many specialized service providers, school nurses, school social workers, speech and language teachers, and school psychologists, are not highly qualified, i.e. do not hold a professional educator license endorsed in their specialty area. A school RN who holds the PEL endorsed as a school nurse assures a level of health care coordination and case management of students with chronic health conditions for all students and specialized training for our students with special needs.

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,

Linda A. Vollinger, IASN President
IASN Executive Board



ILLINOIS BOARD OF HIGHER EDUCATION

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December 22, 2016

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Superintendent
Illinois State Board of Education
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Springfield, IL 62701

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Executive Director
Dr. James L. Applegate

The Illinois Board of Higher Education agency staff have reviewed the current draft ESSA documents and welcome the opportunity to provide feedback now and during the ongoing process to finalize and implement Illinois' plan. Of course, we are particularly focused on the college and career readiness (CCR) component of the plan. We appreciate the work of Illinois State Board of Education (ISBE) staff to engage in statewide listening tours and offer opportunities for public comment. However, it is our belief that the CCR framework is really a design task that must be done in design-oriented (not feedback-oriented) meetings with higher education as a key design stakeholder.

To that end, IBHE encourages ISBE to build on feedback from the P-20 College and Career Readiness Committee, being provided by committee chairpersons Beth Swanson and John Rico, as well as the feedback from other stakeholders and stakeholder groups. That feedback, including this letter, will help stakeholders engage in a 2017 design process with secondary education and Illinois institutions of higher education to clarify outstanding issues and questions and design a CCR framework collaboratively. Given the tight timelines, it would make sense to develop and include the structure and process for the design work as part of the ESSA plan with timelines for activities and completion following adoption of the plan.

National bodies including the Council of Chief State School Officers (www.ccsso.org/Resources/Programs/College_and_Career_Readiness.html) and State Higher Education Executive Officers have created substantial guidance documents that outline both strategies and potential definitions/guidelines for developing a robust, collaborative CCR framework. In addition, "Higher Ed for Higher Standards," a foundation-funded national organization, has enlisted the expertise of national education leaders to provide useful guidelines for effective partnership work needed for ESSA <http://higheredforhigherstandards.org/leveragingessa/>. A 2017 partnership P-12/IHE effort would benefit from these resources and potentially streamline the Illinois work.

Substantial work in Illinois, work that has already been done. Work that is

ongoing, can be used in rethinking the CCR framework currently in draft form:

- PWR Act (HB5729) – The PACE framework in this act provides a robust set of approaches in helping Illinois students create a **personalized post-secondary transition plan** that builds on their interests and strengths while equipping them with post-secondary education planning and “college-going literacy” skills to successfully navigate the move from high school completion to college and/or careers.
- Many community colleges and four-year institutions in the state are engaged in regional partnership work with middle and high schools to articulate curriculum in key areas such as English and math with the purpose of **enriching the senior year of high school for the purposes of “speed up or catch up.”** This type of regional partnership work should be embraced, built upon, and incentivized under ESSA. As you and I have previously discussed, a recent foundation funded effort <http://www.niu.edu/ilhstocollege/index.shtml> provides a detailed resource to support scaling up this work across Illinois. ESSA could be a catalyst for that scaling.
- The CCR framework should use multiple measures and draw on the foundation of the Illinois Learning Standards as a baseline for conversations about preparation and transition. Those standards were created with statewide input, are rigorous and have support across the P-20 continuum.
- IHE and P-12 partnership work to be done collaboratively in 2017 also could and should build on the work of the Illinois Balanced Accountability Measures group for the purposes of school accountability reporting. It should be recognized, however, that school accountability reporting and development of clear, rigorous, CCR standards that can be adopted by P-12 and its college and employer stakeholders are related but different goals.

IBHE stands ready to partner with our colleagues at ICCB and help engage higher education leadership across the state to structure, launch, and implement this design process with ISBE and your schools following national best practice. To be clear, all of this work will not be completed by April. However, we believe it can be structured clearly as part of the plan and implemented following its adoption.

Sincerely,



Dr. James L. Applegate
Executive Director

cc: Dr. Elizabeth Purvis
Dr. Karen Hunter Anderson
Mr. Jason Helfer

To: Illinois State Board of Education
CC: Melina Wright, ISBE; Claudia Quezada, ISBE
From: Pam Witmer, Illinois Network of Charter Schools
Re: ISBE's State Plan – Feedback on second draft
Date: December 27, 2016

As the charter school support organization that represents Illinois' 143 charter public schools, the Illinois Network of Charter Schools (INCS) strongly advocates for the Illinois State Board of Education (ISBE) to maintain the flexibility granted to charter schools under state law while developing its state plan. Many of INCS' recommendations mirror the feedback provided on the first draft of the state plan. INCS stands by these recommendations and welcomes the opportunity to meet with ISBE to discuss further.

Highest Priority Recommendations:

1. ISBE must **maintain the current licensure and teacher evaluation flexibility** guaranteed to charter schools under state law.
2. ISBE should **change the definition of "inexperienced" teacher** to one that has less than one or less than two years of teaching experience.

Additional Recommendations:

1. ISBE should use a linear growth model in its accountability system.
2. ISBE should apply significantly more weight to academic indicators over non-academic indicators, by splitting these weights at 75/25 (75% academic indicators, 25% non-academic indicators.)
3. ISBE should use easy-to-understand summative determinations/ratings. The suggested ratings are confusing and difficult for an objective observer to differentiate.

INCS' Prioritized Feedback

1. Teacher Licensure and Evaluation

ISBE should maintain the current licensure flexibility and teacher evaluation flexibility for charter public schools and carry out the requirements of Section 4 in a way that is consistent with the Illinois Charter Schools Law.

(Section 4.3; page 56.)

The Illinois legislature enacted the Charter Schools Act, in part, to create additional professional opportunities for teachers and to allow charter school to innovate in their teaching and personnel systems. The draft state plan from ISBE threatens to undermine this innovation and autonomy by potentially requiring charter schools to abide by state evaluation requirements and punishing charter schools who employ educators with alternative career pathways.

- a. **Charter public schools should retain their teacher licensure flexibility guaranteed to them under the Charter Schools Law. Nothing in the State Plan or in the final rules requires all charter school teachers to become licensed.** *(Section 4.3; page 56.)*

ISBE should carry out the requirements in Section 4, as they affect teachers in charter schools, in a manner consistent with the Illinois Charter Schools Law. The Illinois Charter Schools Law (105 ILCS 5/27A) grants charter public schools flexibility in hiring and evaluating teachers in instructional positions. The law and administrative code allow charters to hire individuals to fill instructional positions who are either licensed under the laws of Illinois or who meet the requirements under Section 27A-10(c). Under the law, up to 25% of a charter school's teaching force can be in instructional positions without an Illinois teaching license so long as they have a bachelor's degree, 5 years of experience, have passed a basic skills and subject matter knowledge test, and demonstrate continuing evidence of professional growth.¹ This flexibility allows charter public schools to hire alternate career path educators and continue to innovate in the field of education.

ISBE retained this flexibility under the previous versions of ESEA. Under No Child Left Behind, ISBE explicitly stated in its administrative code that teachers who work in charter schools who are either licensed or meet the requirements under Section 27A-10(c) of the School code satisfy NCLB's "highly qualified" requirement.²

- b. **ISBE should modify the definition of "ineffective teacher" to reflect the flexibility granted to charters under current state law since it does not require charter schools to abide by state or district teacher evaluations systems.** *(Section 4.3; page 56.)*

¹ 105 ILCS 5/27A-10(c). (c) Charter schools shall employ in instructional positions, as defined in the charter, individuals who are certificated under Article 21 of this Code or who possess the following qualifications:

(i) graduated with a bachelor's degree from an accredited institution of higher learning;
(ii) been employed for a period of at least 5 years in an area requiring application of the individual's education;
(iii) passed the tests of basic skills and subject matter knowledge required by Section 21-1a of the School Code; and
(iv) demonstrate continuing evidence of professional growth which shall include, but not be limited to, successful teaching experience, attendance at professional meetings, membership in professional organizations, additional credits earned at institutions of higher learning, travel specifically for educational purposes, and reading of professional books and periodicals.

² See page 363 of Appendix D, 23 ILLINOIS ADMINISTRATIVE CODE 25, available here:

<http://www.isbe.net/rules/archive/pdfs/25ark.pdf>. A teacher who is employed in a charter school and who has primary responsibility for teaching content in any of the core academic subjects will be considered highly qualified if he or she either: a) holds a professional educator license applicable to the assignment and meets the other criteria applicable to the assignment, as outlined elsewhere in this Appendix D; or b) holds a bachelor's degree, has passed the relevant content-area test in each core subject area of teaching responsibility, and meets the other requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

ISBE should retain the current flexibility granted to charter schools since they are not required to follow state or district-imposed teacher evaluation systems. ISBE should explicitly state that this does not apply to any of its charter public schools in the state by modifying the definition to state:

A teacher who has received a “needs improvement” on an evaluation and, in a subsequent evaluation, received a rating of “unsatisfactory” or “needs improvement.” A teacher who is employed in a charter school and who has primary responsibility for teaching content in any core academic subject will be considered effective if he or she either: a) holds a professional educator license applicable to the assignment and meets the other criteria applicable to the assignment; or b) holds a bachelor’s degree, has passed the relevant content-area test in each core subject area of teaching responsibility, and meets the other requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

While the Department did not address “ineffective teacher” language in its final rule, it did say in its response to related comments that there is sufficient latitude to define these teacher terms consistent with state law governing charter school teacher credentials:

*Comments and responses, page 86206: “As a condition of receiving title I, part A funds, an SEA must ensure compliance with all applicable statutory and regulatory requirements, including the requirements in section 1111(g)(1)(B) of the ESEA, as amended by the ESSA, and § 299.18(c) of these final regulations. We note that under the final regulations, each SEA and, in the case of the term “ineffective teachers” in States that elect to provide **LEAs with statewide guidelines for defining this term in lieu of providing a statewide definition, districts, have substantial latitude in defining the terms ineffective, inexperienced, and out-of-field in a manner that is consistent with State charter schools law and all other State laws and regulations governing public school teacher evaluation.**”*

As such, ISBE should define these terms consistent with the Illinois Charter Schools Law. Under state law, charter school teachers are not required to follow the state evaluation system (PERA) or any district-created evaluation system, such as CPS’ REACH system.³ The current suggested definition of “ineffective teacher” in the state plan includes one who has “received a ‘needs improvement’ on an evaluation and, in a subsequent evaluation, received a rating of ‘unsatisfactory’ or ‘needs improvement.’” Many charter schools’ evaluation systems do not have these designations, nor should they be required to restructure their evaluations to align with a state mandate, as that conflicts with the flexibility over personnel decisions that is central to the charter law.

Charter schools should be able to retain this flexibility so they can continue to innovate and develop best practices regarding teacher evaluation. In fact, this aligns with the purpose of charter schools as stated in the preamble of the Charter Schools Act: it was enacted to “encourage the use of teaching methods that may be different in some respects than others regularly used in the public school system” and to “create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site.” See 105 ILCS 5/27A-2(b)(3) and (b)(5). The General Assembly intended to “create a legitimate avenue for parents, teachers, and community members to take responsible risks and create new, innovative, and more flexible ways of educating children” and sought to create opportunities within the public school system “to develop innovative and accountable teaching techniques.” 105 ILCS 5/27A-2(c).

³ 105 ILCS 5/24A-1, et al.

c. Charter school teachers should not be considered “out-of-field” if they satisfy the requirements under 105 ILCS 5/27A-10(c). (Section 4.3; page 56.)

Charter school teachers should *not* be classified as “out-of-field” if they are licensed or meet the alternative requirements outlined in the Charter Schools Law by holding a bachelor’s degree, passing the relevant content-area test in each core subject area of teaching responsibility, and meeting the other requirements of Section 27A-10(c) of the School Code.

The current state plan draft defines an out-of-field teacher as a “teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license or endorsement.” While this may have been used as a statewide definition or guideline previously, ISBE should modify this to reflect the flexibility granted by law to charter school teachers. As mentioned in paragraphs (1)(a) and (1)(b) above, charter school teachers are granted flexibility in their licensure and ISBE has the ability to define this while following Illinois Charter Schools Law. To ensure that they retain this flexibility, ISBE should clarify that teachers who are either licensed or who meet the alternative to licensure requirements under the Charter Schools Law will not be classified as “out-of-field.”

ISBE should modify the definition of “out-of-field” to state:

A teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license or endorsement. A teacher teaching in a charter school shall not be considered “out-of-field” if he or she meets the requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

2. Defining Inexperienced Teachers

The definition of “inexperienced teacher” should be a teacher with less than one year of teaching experience. Alternatively, the definition could also be a teacher with less than two years of teaching experience. (Section 4.3; page 56.)

ISBE should follow the guidelines set forth in the 2015 Illinois Equity Plan, which defines inexperienced teachers as those with less than 1 year of experience.⁴ Alternatively, ISBE could define an inexperienced teacher as one with less than two years of teaching experience.

Under ISBE’s proposed definition, which labels teachers with less than four years of experience as “inexperienced,” charter school teachers may be unfairly characterized as having more inexperienced teachers. Our position is that effectiveness as measured by student impact is far more important than “experience,” however defined. To the extent these ESSA guidelines are designed to create accountability standards based on teacher experience level, INCS suggests a focus on student impact. For example, numerous charters have highly effective teachers who are in their second or third year of teaching. Schools should not be penalized for this staffing structure, particularly when state law still permits charter funding disparities that make salary parity a particular concern for charter public schools.

⁴ 2015 Illinois Equity Plan, Illinois State Board of Education, p. 12. Available at: <http://www2.ed.gov/programs/titleiparta/equitable/ilequityplan060115.pdf>.

To help illustrate this point, below are the breakdowns of a couple of schools' teaching workforce. Other charter schools stated that between 50-70% of their teachers in instructional positions may have less than four years of experience.

| Percentage of Teaching Staff – Years of Experience | | | | | |
|----------------------------------------------------|---------------------|-----------------------|-----------------------|-----------------------|--------------------------------------------------------------|
| School type | 0-1 year experience | 1-2 years' experience | 2-3 years' experience | 3-4 years' experience | Total teaching staff with less than 4 full years' experience |
| Single Site Charter School | 0% | 5% | 37% | 21% | 63% |
| Smaller Charter Network | 6% | 11% | 16% | 13% | 46% |

Additional Recommendations

1. ISBE should weigh academic indicators at 75%, and non-academic indicators at 25%.

(Section 3.1; page 33.)

Academic indicators should be the predominant driving factor in school performance, with growth weighing more than attainment and EL proficiency. The academic indicators should make up 75% of the accountability model. The non-academic indicators should be weighted at 25%. Please see the suggested models in paragraph 2 below.

2. Growth should be included in the high school model, along with the elementary school model, and should be given significant weight in the accountability systems.

(Section 3.1; page 17.)

ISBE's accountability model should reflect a fair assessment of student performance, and therefore should include growth at both the elementary/middle and high school level.

Student growth is currently the most effective way to measure the value schools add for their students. A model which factors achievement only is more susceptible to the socio-economic make-up of the student body than one which also factors growth. Thus, an achievement-only model, like the one ISBE suggests to use in the high school model, is inherently unfair to districts and schools with large a low-income student body. Growth, on the other hand, provides a fairer depiction of student progress that can be measured across all school types, including low-wealth and high-wealth schools.

INCS' suggested models are as follows:

High School Model

- A. Achievement – 10 pts
- B. HS Growth – 35 pts
- C. High School Grad Rates – 20 pts
- D. EL Proficiency – 10 pts
- E. Student Success/School Quality
 - a. 9th Grade on Track – 10 pts
 - b. Attendance – 5 pts
 - c. Postsecondary Credential Attainment (AP/IB/Dual Credit/CTE) – 5 pts
 - d. Postsecondary Enrollment – 5 pts

Elementary and Middle School Model

- 1. Achievement – 15 pts
- 2. ES/MS Growth – 50 pts
- 3. EL Proficiency – 10 pts
- 4. Student Success/School Quality
 - a. 8th Grade on Track – 15 pts
 - b. Attendance – 10 pts

If, however, ISBE decides not to include growth in the high school accountability model, ISBE should use a model as follows:

1. Achievement - 25
2. HS Graduation - 35
3. EL Proficiency - 15
4. Student Success/School Quality
 - a. 9TH Grade On-Track - 10
 - b. Attendance – 5
 - c. Postsecondary Credential Attainment (AP/IB/Dual Credit/CTE) - 5
 - d. Postsecondary Enrollment - 5

3. ISBE should use the Linear Model / Student Growth Percentiles Growth Model.
(Section 3.1; page 26.)

Unlike the other two growth models and hybrid model suggested, a linear/student growth percentile model captures even small amounts of growth students make. The value tables and student growth to proficiency model only measure whether a student is above or below a certain cutoff point or linear trajectory; they do not necessarily always show or give “credit” for how much a student has grown. Student growth percentiles will look at a student’s one-year growth, regardless of how small or in what direction (e.g., positive or negative) the growth may be, and assign a student a percentile based on that growth. This model will provide a more accurate depiction of how much students learn over the course of a year.

4. ISBE should create a summative, single determination/rating system for all schools and districts that that is easy for stakeholders to understand.
(Section 3.1, page 38.)

INCS stands by its initial recommendation that ISBE must employ a summative rating system/summative determination that accurately reflects student performance and heavily emphasizes student growth in order to allow parents, stakeholders, and education leaders to have a clear understanding of school and district performance. While the final rules call for only a summative determination, ISBE still has an opportunity to clearly share how schools and districts are performing by using an objective, intuitive rating system that can be easily conveyed to parents via school and district communications.

ISBE’s suggested ratings of only the accountability categories of “initial,” “growing,” “meeting,” and “exceeding” are extremely difficult to understand. When surveyed, some school leaders could not differentiate between whether “initial” was better than “growing” or whether “meeting” meant a school was performing better than “growing.” INCS encourages ISBE to consider other rating systems to apply to a school or district, including the A-F rating system that INCS suggested in its first round of feedback. Such a rating system will be easier to convey to school leaders, parents, and other stakeholders than a number, color, or other categorical systems like the one ISBE has suggested.

To: Illinois State Board of Education
CC: Melina Wright, ISBE; Claudia Quezada, ISBE
From: Pam Witmer, Illinois Network of Charter Schools
Re: ISBE's State Plan – Feedback on second draft
Date: December 27, 2016

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c. Charter school teachers should not be considered “out-of-field” if they satisfy the requirements under 105 ILCS 5/27A-10(c). (Section 4.3; page 56.)

Charter school teachers should *not* be classified as “out-of-field” if they are licensed or meet the alternative requirements outlined in the Charter Schools Law by holding a bachelor’s degree, passing the relevant content-area test in each core subject area of teaching responsibility, and meeting the other requirements of Section 27A-10(c) of the School Code.

The current state plan draft defines an out-of-field teacher as a “teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license or endorsement.” While this may have been used as a statewide definition or guideline previously, ISBE should modify this to reflect the flexibility granted by law to charter school teachers. As mentioned in paragraphs (1)(a) and (1)(b) above, charter school teachers are granted flexibility in their licensure and ISBE has the ability to define this while following Illinois Charter Schools Law. To ensure that they retain this flexibility, ISBE should clarify that teachers who are either licensed or who meet the alternative to licensure requirements under the Charter Schools Law will not be classified as “out-of-field.”

ISBE should modify the definition of “out-of-field” to state:

A teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license or endorsement. A teacher teaching in a charter school shall not be considered “out-of-field” if he or she meets the requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

2. Defining Inexperienced Teachers

The definition of “inexperienced teacher” should be a teacher with less than one year of teaching experience. Alternatively, the definition could also be a teacher with less than two years of teaching experience. (Section 4.3; page 56.)

ISBE should follow the guidelines set forth in the 2015 Illinois Equity Plan, which defines inexperienced teachers as those with less than 1 year of experience.⁴ Alternatively, ISBE could define an inexperienced teacher as one with less than two years of teaching experience.

Under ISBE’s proposed definition, which labels teachers with less than four years of experience as “inexperienced,” charter school teachers may be unfairly characterized as having more inexperienced teachers. Our position is that effectiveness as measured by student impact is far more important than “experience,” however defined. To the extent these ESSA guidelines are designed to create accountability standards based on teacher experience level, INCS suggests a focus on student impact. For example, numerous charters have highly effective teachers who are in their second or third year of teaching. Schools should not be penalized for this staffing structure, particularly when state law still permits charter funding disparities that make salary parity a particular concern for charter public schools.

⁴ 2015 Illinois Equity Plan, Illinois State Board of Education, p. 12. Available at: <http://www2.ed.gov/programs/titleiparta/equitable/ilequityplan060115.pdf>.

To help illustrate this point, below are the breakdowns of a couple of schools' teaching workforce. Other charter schools stated that between 50-70% of their teachers in instructional positions may have less than four years of experience.

| Percentage of Teaching Staff – Years of Experience | | | | | |
|----------------------------------------------------|---------------------|-----------------------|-----------------------|-----------------------|--------------------------------------------------------------|
| School type | 0-1 year experience | 1-2 years' experience | 2-3 years' experience | 3-4 years' experience | Total teaching staff with less than 4 full years' experience |
| Single Site Charter School | 0% | 5% | 37% | 21% | 63% |
| Smaller Charter Network | 6% | 11% | 16% | 13% | 46% |

Additional Recommendations

1. ISBE should weigh academic indicators at 75%, and non-academic indicators at 25%.

(Section 3.1; page 33.)

Academic indicators should be the predominant driving factor in school performance, with growth weighing more than attainment and EL proficiency. The academic indicators should make up 75% of the accountability model. The non-academic indicators should be weighted at 25%. Please see the suggested models in paragraph 2 below.

2. Growth should be included in the high school model, along with the elementary school model, and should be given significant weight in the accountability systems.

(Section 3.1; page 17.)

ISBE's accountability model should reflect a fair assessment of student performance, and therefore should include growth at both the elementary/middle and high school level.

Student growth is currently the most effective way to measure the value schools add for their students. A model which factors achievement only is more susceptible to the socio-economic make-up of the student body than one which also factors growth. Thus, an achievement-only model, like the one ISBE suggests to use in the high school model, is inherently unfair to districts and schools with large a low-income student body. Growth, on the other hand, provides a fairer depiction of student progress that can be measured across all school types, including low-wealth and high-wealth schools.

INCS' suggested models are as follows:

High School Model

- A. Achievement – 10 pts
- B. HS Growth – 35 pts
- C. High School Grad Rates – 20 pts
- D. EL Proficiency – 10 pts
- E. Student Success/School Quality
 - a. 9th Grade on Track – 10 pts
 - b. Attendance – 5 pts
 - c. Postsecondary Credential Attainment (AP/IB/Dual Credit/CTE) – 5 pts
 - d. Postsecondary Enrollment – 5 pts

Elementary and Middle School Model

- 1. Achievement – 15 pts
- 2. ES/MS Growth – 50 pts
- 3. EL Proficiency – 10 pts
- 4. Student Success/School Quality
 - a. 8th Grade on Track – 15 pts
 - b. Attendance – 10 pts

If, however, ISBE decides not to include growth in the high school accountability model, ISBE should use a model as follows:

1. Achievement - 25
2. HS Graduation - 35
3. EL Proficiency - 15
4. Student Success/School Quality
 - a. 9TH Grade On-Track - 10
 - b. Attendance – 5
 - c. Postsecondary Credential Attainment (AP/IB/Dual Credit/CTE) - 5
 - d. Postsecondary Enrollment - 5

3. ISBE should use the Linear Model / Student Growth Percentiles Growth Model.
(Section 3.1; page 26.)

Unlike the other two growth models and hybrid model suggested, a linear/student growth percentile model captures even small amounts of growth students make. The value tables and student growth to proficiency model only measure whether a student is above or below a certain cutoff point or linear trajectory; they do not necessarily always show or give “credit” for how much a student has grown. Student growth percentiles will look at a student’s one-year growth, regardless of how small or in what direction (e.g., positive or negative) the growth may be, and assign a student a percentile based on that growth. This model will provide a more accurate depiction of how much students learn over the course of a year.

4. ISBE should create a summative, single determination/rating system for all schools and districts that that is easy for stakeholders to understand.
(Section 3.1, page 38.)

INCS stands by its initial recommendation that ISBE must employ a summative rating system/summative determination that accurately reflects student performance and heavily emphasizes student growth in order to allow parents, stakeholders, and education leaders to have a clear understanding of school and district performance. While the final rules call for only a summative determination, ISBE still has an opportunity to clearly share how schools and districts are performing by using an objective, intuitive rating system that can be easily conveyed to parents via school and district communications.

ISBE’s suggested ratings of only the accountability categories of “initial,” “growing,” “meeting,” and “exceeding” are extremely difficult to understand. When surveyed, some school leaders could not differentiate between whether “initial” was better than “growing” or whether “meeting” meant a school was performing better than “growing.” INCS encourages ISBE to consider other rating systems to apply to a school or district, including the A-F rating system that INCS suggested in its first round of feedback. Such a rating system will be easier to convey to school leaders, parents, and other stakeholders than a number, color, or other categorical systems like the one ISBE has suggested.



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illinois school library media association

December 22, 2016

Dear Superintendent Smith, Chairman Meeks and Members of the Illinois State Board of Education,

As educators, school librarians are concerned with the development of the Whole Child and want to see a state ESSA Plan that is focused on equity between schools and districts, as well as among services for populations. As the state ESSA Draft Plan is being considered by leadership in Springfield, the Illinois School Library Media Association would like to emphasize the following library and librarian focused opportunities to support student achievement and more equitable education across the state:

1. We ask that ISBE retain the statutory required component in the second draft “How the LEA will identify and address disparities in library resources.”
2. We ask that ISBE require licensed school librarians in the IL Administrative Code.
3. We ask that ISBE adopt the *Linking for Learning* guidelines as the framework for measuring effective school library programs.
4. We ask that ISBE use a small portion of its federal MTSS (multi-tiered system of support) funding to maintain a “statewide support liaison” dedicated to school libraries.

The school library is the largest classroom in the school, allowing children to explore interests, problem solve, and build information literacy skills. School libraries promote and encourage well-rounded, collaborative, lifelong learners. Licensed school librarians provide a wide variety of programs for students to participate and are trained to select high-quality materials and literature that support student interests, as well as Common Core. Illinois school librarians are equipped to help students navigate digital media and become socially responsible users of information in our fast-paced world and help foster an appreciation of literature and a love of reading in our students.

We thank you for continuing the dialog and for taking the time to listen to feedback from the Illinois stakeholders who have a vested interest in our students and their education.

Sincerely,

Patti Fleser
President, Illinois School Library Media Association
president@islma.org



Dear Illinois State Board of Education:

I am writing on behalf of Ingenuity, which serves as the single source of data collection and dissemination, professional learning, and advocacy efforts for the arts education sector working with Chicago Public Schools (CPS).

Firstly, it is important to note that research supports Ingenuity's stance that the arts are imperative to a student's receiving a complete education. From test scores to classroom climate, from graduation rates to attendance, the arts in classrooms have positive impacts on K-12 education. Americans for the Arts has an entire section of their website dedicated to research and information supporting the important benefits of the arts in schools (<http://www.americansforthearts.org/by-program/reports-and-data/legislation-policy/legislative-issue-center/arts-education-policy-and-funding>). One very recent example of the impacts of the arts on Chicago students comes from NPR radio's feature of a Northwestern University study on the positive impacts that music education has on the teen brain (<https://www.wbez.org/shows/wbez-news/study-music-changes-the-teen-brain/fd8f453e-7faf-4fba-ac85-9b873f4a2a17>).

But most important to ESSA implementation, and often overlooked, is that the arts are a core subject according to Illinois law (Ill. Admin. Code tit. 23, § 1.10), and through the planning and implementation of ESSA, ISBE has the opportunity to encourage districts across the state to provide the arts in the manner fit for a core academic subject.

Ingenuity submits the following recommendations and comments for Illinois' second Draft ESSA Plan:

We compliment ISBE on its execution of Section 1, and thank the Board for allowing open and extensive public comment and inclusion in the ESSA process.

We ask ISBE to correct the omission of "arts" in its description of well-rounded education in section 5 on page 60.

We ask that ISBE maintain its inclusion of the arts as a statutory required component of the Plan on page 68 (How the LEA will support efforts to encourage and support the arts). We encourage ISBE to consider stronger language that reinforces the teaching of arts within the school day as a core academic subject.

Section 3.1 : We ask that ISBE include the arts (Fine and Performing Arts) as an indicator of school quality for both elementary and high school, and define the arts as part of a well-rounded education rather than enrichment. The arts are a core subject according to Illinois law and they are a subject area available to every student population including those targeted for supports in ESSA, therefore they make an ideal subject area to support ESSA's desire to track school quality across all student populations.

The arts have been shown to increase student, teacher, and parent & community engagement and satisfaction. The arts have also been shown to increase student and teacher attendance, to encourage student and teacher retention, and to enhance classroom climate across all grade levels K-12 (http://www.americansforthearts.org/sites/default/files/file_attach/ESSA_Outcomes.pdf).

Ingenuity encourages ISBE to review comments submitted by Arts Alliance Illinois for additional research supporting the inclusion of the arts as a distinct school quality indicator.

ADDITIONALLY, per our comments on ISBE's ESSA Draft #1:

Across Illinois' ESSA Plan : To ensure that districts understand the flexibility they have in providing the arts, we ask that ISBE express the breadth and depth of the arts by changing FINE ARTS to FINE AND PERFORMING ARTS in all sections where the arts are mentioned, and defining the five (5) recognized art disciplines (visual art, music, theatre, dance, and media arts) for which the state has updated, approved learning standards.



Section 1111(b)(1)(C)-(D) : We ask that ISBE make the arts (Fine and Performing Arts) explicit in the section on Challenging Academic Standards, as the new Arts Learning Standards have been approved by ISBE.

Section 1201 : we ask that ISBE acknowledge that formula grant funds can/should be used to create a high-quality assessment for the arts (Fine and Performing Arts).

Section 4.2-A : We thank ISBE for acknowledging that the arts (Fine and Performing Arts) provide unique benefits and require professional learning supports, and that ISBE recognize the unique needs for provision of professional development in the arts, and make clear a recommendation that these federal funds be utilized to enhance arts professional learning, thereby enhancing student outcomes and increasing instructor retention and effectiveness across the state for arts and non-arts instructors.

Use of Title II : Because the arts are unique in both their provision and program evaluation, we request that Title II specifies supporting appropriate professional learning opportunities for arts and non-arts instructors on the in-school-time provision of fine and performing arts education and arts integration activities. Arts integration provides schools with the opportunity to educate instructors and school leaders on the value of teaching the arts through other curricular subjects, and other curricular subjects through the arts.

In addition, Ingenuity asks ISBE to ensure that school districts understand that the arts can be funded through local, state, and federal STEM funding, as the federal definition of STEM now includes the arts.

On behalf of Ingenuity, thank you for the opportunity to make these recommendations and comments on ISBE's second draft ESSA Plan. I look forward to continuing to engage ISBE in our efforts to increase arts education equity, access, and quality.

Sincerely,

AmySue Mertens

Director of Public Affairs

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Mrs. Erin Conn, Elementary Principal

Mr. Jeff Baughman, Jr./Sr. High Principal

Mr. Steve Reschke, LPA Principal

December 7, 2016

Illinois State Board of Education
Springfield, IL 62701

via essa@isbe.net

I am writing in support of the multi-pathway approach to College and Career Readiness that was presented at your November ISBE Board Meeting. As ISBE develops its definition of College and Career Readiness, I strongly encourage approval of this multi-pathway approach. This framework, developed over the past year with organizations and leaders throughout Illinois, ensures student readiness is defined in a multitude of ways.

I consider one of our primary roles in public education is to ensure that our students have the greatest opportunity to enrich the society in which they live. To do so, they must have a fundamental knowledge of what makes our society what it is, learn tolerance, develop an understanding of how to live and work together, and be able to think critically about the events and rhetoric surrounding the events at a level to take an informed position. While much of this does happen in classrooms, it also occurs in the world of work, the participation in extra and co-curricular experiences, and in the engagement with adults that can share experiences beyond their own. We have to be able to allow for space outside the educational environment for experiences to exist for our students. To fail to allow for that, is to fail to meet the demands of our civic and economic responsibility.

History is a great teacher, and while NCLB was impactful in moving the needle of accountability through reflection and effort, it also moved the needle further from creativity and the entrepreneurial spirit that made our nation a center of innovation. NCLB built a box that we tried to push every student, every learner, and every teacher into.

We have a chance in Illinois to get it right. Do not use ESSA to build a box. Our children, our districts, and our communities are all different and are capable of demonstrating greatness in a wide variety of unique ways. We should not only allow for that, but encourage it. We have an expansive economy and need expansive learning opportunities to prepare our students to enter that economy. The economy needs a workforce to enter from various paths: some will come from college, some from workforce training, while others will find their way in through dreams matched with an unquenchable work ethic.

Hold us accountable to ensure that our students are more capable as a result of their educational experience, that from the beginning to the end of the year, they have more skills, more interest, and are able to prove it. Please allow us to demonstrate that proficiency in a variety of ways. Our students are very capable but are differently capable one from another. Do not constrict us to a box. Allow us to celebrate the capacity and unique giftedness of each of our learners.

I strongly encourage adoption of the multi-pathway College and Career Readiness framework, and allow for a reporting mechanism, with enough flexibility to showcase the uniqueness of each district and the students they represent.

Very truly yours,

Gary R. Tipsord
Superintendent

ECE and ESSA Subcommittee Meeting Recommendations ISBE State Plan Sections 5.1 and 5.2

PREAMBLE

ESSA presents an opportunity for Illinois to build a cohesive educational system from birth through post-secondary. A well-rounded education includes increasing access to high quality early childhood programming as a viable investment for schools in reducing the opportunity gap. Schools are a central hub in communities and are ideally situated to bring families and resources together. Our recommendations emphasize the importance of the following ideas:

- Align early childhood education programs to the K-12 system
- Expand quality early childhood education programming
- Invest in adequate resources and support personnel to meet the needs of the whole child in every school
- Implement culturally and linguistically responsive practices throughout the EC – 12 system
- Capitalize on community and family strengths to support the entire learning community
- Incentivize collaboration among all Illinois state-sponsored programs

We hope ISBE will utilize our recommendations as a catalyst to better serve the whole child, families and communities.

SECTION 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS – (p. 41-57)

A. Transitions, continuum of a student’s education from preschool through grade 12 (p. 41)

- ✓ Illinois is a leader in providing high quality early childhood education (ECE) and therefore should put a greater emphasis on the implementation of best practices in transitioning children from stage to stage. This includes transitions from birth to three services into preschool and Head Start programs, and then from these programs and services into kindergarten.
- ✓ ECE personnel should be equipped to handle new child enrollment across the continuum of the entire school year as children transitioning from Early Intervention turn three.
- ✓ To capitalize on ECE gains, professional development and resources must be provided to preschool and kindergarten teachers to support the transition of children and families to kindergarten.
- ✓ ISBE must ensure timely and appropriate transitions for children receiving Early Intervention. Children receiving Early Intervention are to receive a timely evaluation and an IEP if needed. It is imperative that the student is then appropriately transitioned to preschool special education services, or appropriate community supports when the child turns three.

B. Equitable access to a well-rounded education in all subject areas (p. 45 – 46)

- ✓ ISBE should ensure access to high quality early learning programs and wraparound services that are targeted to underserved communities with persistent poverty. A body of research supports that high quality early learning programs significantly improve academic achievement for children of color and/or children living in poverty.

C. School conditions for student learning: bullying, discipline practices, student health and safety (p. 47-48)

- ✓ Preschool expulsion and suspension disproportionately impacts low-income students of color. All state sponsored early childhood education programs must develop behavior intervention policies, which are developmentally and culturally appropriate for the early learner.
- ✓ To be effective in addressing the needs of the whole child regardless of setting, it is critical that all students, beginning at the early childhood level have access to school nurses, guidance counselors, social workers, mental health professionals, and other resources to address child health in their programs. Please refer to the Illinois Early Learning Council's Proposed Plan for Integrating Health into Early Care and Education Systems <http://bit.ly/2e315qA>.
- ✓ ISBE should require practitioner-led professional development and additional resources for social-emotional screening and behavioral health intervention at the early childhood level. It is also important to provide mental health consultation to teachers in early childhood education settings; this will address

preschool suspension/expulsion disparities, discipline practices, and the social-emotional needs of students.

- ✓ The opportunity gap can be linked to socio-economic factors. Schools should provide resources by connecting students and families to support services they need, including SNAP, TANF and All Kids, therefore creating a more supportive environment for learning and decreasing absenteeism. (This has been demonstrated through Chicago Public Schools Children and Family Benefits Unit.)

D. Effective use of technology and digital literacy (p.48 – 50)

- ✓ To address digital literacy of all students, ECE student access to technology and the integration into student learning should be developmentally appropriate and follow the joint guidelines from the U.S. Department of Education (DOE) and Department of Health and Human Services (HHS) on technology and early education. Please refer to the following website: <http://tech.ed.gov/earlylearning/principles>

E. Parent, family, and community engagement (p. 50-53)

- ✓ ESSA allows a portion of family engagement funds to be used for joint professional development inclusive of early childhood educators. ISBE should outline how it will use professional development funds and family engagement funds for joint professional development between ECE and K – 12 to best meet the unique needs of families in their communities.
- ✓ Parent and family engagement must be collaborative, inclusive, culturally and linguistically responsive, and conducted at a time when guardians and caregivers can participate. Engaging families is especially crucial in the early years of learning as it sets the foundation for young children in their development.
- ✓ ISBE should describe how it will implement authentic parent and family engagement to include community-based programs, as well as reach underserved families beyond the walls of the school and outside of school hours.
- ✓ ISBE should include and invest in multi-generational approaches to family engagement that include workforce development and career pathways to caregivers.
- ✓ ISBE should develop additional tools and internal and external resources to engage underserved families (such as students and families who are homeless, those with disabilities, migrant, English Learners, immigrant, and those experiencing mental health issues and trauma) to ensure that all families are included.
- ✓ Illinois School Code calls for the formation of Bilingual Parent Advisory Councils in order to engage the parents of English Learners. Early childhood is a critical time for English learners beginning their academic journey; participation in Bilingual Parent Advisory Councils should be inclusive of preschool programs.

F. Accurate identification of English Learners and children with disabilities (p. 53 – 54)

English Learners and children with disabilities are two distinct student populations with unique instructional needs. There is an overlapping group, which consists of ELs, who through an evaluation process, are identified as needing special education.

Identification of English learners:

- ✓ Illinois should continue the practice of identifying English Learners upon enrollment in state-funded programs (including those supported through the Prevention Initiative) through a Home Language Survey and English screening. ISBE should replace the current Home Language Survey with the recommended language survey included in the U.S. Department of Education Tool Kit (<http://files.eric.ed.gov/fulltext/ED564264.pdf>) because it provides more relevant information for instruction for teachers in all state-funded early childhood programs.
- ✓ Illinois should continue to serve ELs beginning in ECE with culturally and linguistically sound programming. Please refer to the joint statement issued in 2016 by the DOE and HHS https://www.acf.hhs.gov/sites/default/files/ece/dll_policy_statement_final.pdf.
- ✓ EL years of service should be counted beginning in first grade, which is the first mandatory age of enrollment in Illinois.
- ✓ ELs once identified should continue to be served in programs until they meet the state established reclassification criteria.

English Learners with disabilities:

- ✓ It is critical that Illinois continue the practice of using qualified bilingual educational support personnel in identifying ELs with special needs. This avoids potential misidentification. EL students are entitled to both ESL/Bilingual and Special Education services if the child receives an IEP.

ECE children with disabilities:

- ✓ ISBE should develop a system for informing Local Education Agencies (LEA) of their responsibility to conduct Child Find activities and hold them accountable for implementing best practices in this area.
- ✓ Child Find should be supported by adequate funding, offered monthly, and monitored by the school district. With increased marketing, event frequency, and better coordination with Early Intervention, school districts will identify young children birth to five who are eligible for services.
- ✓ If students require special education services, parents and families of students should be included in developing the IEP before services are delivered; particular attention should be given to families who are culturally and linguistically diverse.
- ✓ Increased funding is needed so all children enrolled in ISBE funded community-based ECE programs can receive district sponsored special education services at the site of instruction. This would remove unnecessary barriers to accessing services during the most vulnerable years of a child's development.

SECTION G - Other state-identified strategies (p. 54 – 58)

Title I (p. 54 - 55)

- ✓ ISBE should incentivize LEAs to use Title I funding to expand ECE programming in schools that are underperforming. Schools must describe how they will support, coordinate and integrate ECE programs with K-12, including transition planning.

Title IV Part A & B -- 21st Century Centers: No comment (p. 56 – 58)

SECTION. 5.2 – PROGRAM SPECIFIC REQUIREMENTS (p. 58 – 92)

Title I, Part A (p. 58): No Comment

Title I, Part C – Migratory Children – (p. 59 – 68)

- ✓ ISBE should be coordinating with Migrant Head Start and using the Migrant Student Information Exchange (MSIX) to ensure seamless transitions to K-12 for early childhood migrant students.

Title III Part A: (p. 68 – 69)

- ✓ As children enter programs supported by the Prevention Initiative, the intake process should note the language of the caregiver in order to plan appropriate services from the beginning.
- ✓ Beginning at age three the Home Language Survey is to be used for all state-funded early learning programs. ISBE should replace the current Home Language Survey with the recommended language survey included in the U.S. DOE Tool Kit (<http://files.eric.ed.gov/fulltext/ED564264.pdf>).
- ✓ ISBE should support early dual-language programs as a pathway to promoting bilingualism and biliteracy, considering the state's efforts in endorsing The Seal of Biliteracy awarded to high school seniors.
- ✓ Illinois currently has a shortage of bilingual endorsed ECE teachers, and should set aside a portion of Title III funds to explore changes to ECE teacher preparation programs. We recommend seeking the advice of the Illinois Advisory Council on Bilingual Education on this topic.

Title V, Part B, Rural and Low Income Schools – No comment (p. 70)

McKinney-Vento Education for Homeless Children and Youth – (p. 70 – 97)

The ESSA makes some important updates to the McKinney-Vento Education for Homeless Children and Youth program, including the following requirements related to preschool age children:

- ✓ ESSA state plans must include procedures that ensure that homeless children have access to public preschool programs, administered by the State Education Agency (SEA) or LEA, as provided to other children.
- ✓ McKinney-Vento liaisons must ensure homeless families and children can access early intervention services under IDEA Part C, if eligible.
- ✓ The definition of school of origin includes preschools.

Although ISBE's draft ESSA plan adequately describes how Illinois will implement many McKinney-Vento requirements, new and old, we feel the plan would be significantly strengthened by more comprehensively addressing issues related to data collection and reporting, identification of homeless children, training for McKinney-Vento liaisons and other staff, cross-divisional collaboration, and transportation. Specific ideas for addressing these areas are included below.

- ✓ Make aggregate data available for the State of Illinois on the number of students identified as homeless. Break down the data by age/grade level/race/language, including children under the age of three. This statewide data should be included on the ISBE website by county.
- ✓ Update the Common Form to better reflect and support referrals to early care and education programs, particularly those programs that serve infants and toddlers.
- ✓ Local districts identify relevant training on the McKinney-Vento Act for key early childhood program staff, as well as strategies for identifying and serving young homeless children.
- ✓ Homeless liaisons need adequate time to fulfill the responsibilities of their role to truly ensure homeless children can access early childhood programs.
- ✓ Ensure that ISBE early childhood policies, manuals, and training materials/efforts reflect the importance of recruiting, identifying, and enrolling homeless children in ISBE-funded early childhood programs.

Ladies and Gentlemen:

Since 1995, I have worked in Chicago as a high school math teacher and a K-8 math specialist, and I now run a non-profit consulting group focused on promoting and supporting Lesson Study, a form of teacher-led professional development.

Please consider the following suggestions regarding draft 2 of the Illinois ESSA State Plan.

4.2 SUPPORT FOR EDUCATORS

A. Resources to support state-level strategies

The first and last bullet points in this part are written as if in ignorance of the research consensus regarding effective professional development. The first bullet proposes "professional learning for educators to build their content knowledge..." The last bullet speaks vaguely about "professional learning that is mostly likely to be effective."

Building teacher knowledge is useful only if paired with activities focused on developing teacher expertise – i.e. a teacher's ability to apply new knowledge in the classroom. By itself, p.d. focused on putting new knowledge into teachers' heads has been shown time and again insufficient to change teacher practice. This document should make that explicit.

As for "professional learning that is most likely to be effective," I urge you to make a clear stand based on what is known. See "Professional Learning in the Learning Profession" by Darling-Hammond et al., NSDC, 2009:

"Effective professional development is intensive, ongoing, and connected to practice; focuses on the teaching of specific academic content; is connected to other school initiatives; and builds strong working relations among teachers." (p.5)

The NSDC report explicitly cites Lesson Study as an example of effective professional development (p. 16), and this plan should do so as well, especially since Lesson Study is still relatively unknown in the U.S. Title II funds should be available to provide release time for teachers to engage in Lesson Study and other activities that fit NSDC criteria. Title II funds should NOT be available for one-shot workshops.

The third bullet proposes "developing resources, such as units and lessons..." No disrespect to ISBE, but curriculum development requires specialized knowledge and skill which few educators have. While many educators can craft effective lessons, or units, for their students, it is very, very difficult to create a curriculum that coherently addresses multiple years of content, and a patchwork of units and lessons, of varying quality, from which teachers are supposed to pick and choose, will not be useful to most teachers. Furthermore, the advantage of the Common Core, and the NGSS, is that curriculum development need not be done on a state-by-state basis. Illinois can and should benefit from work being done nationally. The existence of low-quality commercial curricula is not an argument for trying to roll our own.

The rest of this third bullet point is a laundry-list of stuff that could cover just about everything that is currently being done. By including everything, you risk diluting funds to such a degree that nothing is really accomplished. Consider making this section more focused on improving core instruction.

Finally, missing from this section is any mention of developing or supporting teacher leaders. Schools and districts should be allowed to use Title II funds to provide release time or reduced teaching loads for teacher leaders with demonstrated expertise in pedagogy, so that they can observe and give non-evaluative coaching and feedback to peers. Helping teachers improve, day to day, is only manageable if we engage teachers themselves in doing it.

Thank you for your attention.

Tom McDougal
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Listen to the American Radioworks [documentary on Lesson Study](#)

December 14, 2016

Dear ESSA Committee,

As a primary school school librarian serving over 350 students from early childhood to 2nd grade I am an important library resource. All student deserve certified, licensed school librarians. As a school librarian I am educated and trained to provide essential skills to create responsible 21st Century citizens, lifelong learners and readers. With the increasing use of technology in daily lives, young children are overwhelmed with social media and devices. My job is more than just reading stories and checking out books. I am shaping tomorrow's global leaders by teaching research skills and digital citizenship. I am a resource for students in helping close the digital divide and providing equitable access to technology, devices and Internet. All students should have the same opportunity to succeed in school and beyond. Please continue to support school libraries by advocating the importance of a certified school librarian in EACH school building. One school librarian per district is not enough. Our children/students deserve more and better. I want to continue to be the best resource to my students and to do so we need the support of a certified, school librarian in each school building.

Sincerely,

Noelle Swanson

Library Media Specialist, MLIS

Park School

Orland School District 135



Michael S. Kelly, Ph.D., LCSW Associate Professor
School of Social Work
820 N. Michigan Ave. #1245 | Chicago, Illinois 60611
p (312) 915-7486 | f (312) 915-7645
mkell17@luc.edu

December 16th, 2016

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223
Send via email to essa@isbe.net

Dear Dr. Smith:

I am Dr. Michael S. Kelly, Associate Professor at Loyola University Chicago School of Social Work. I have published over 50 journal articles, books, and book chapters on school mental health, evidence-based practice, and multi-tiered systems of support, and I am thrilled to lend my support to this ESSA Plan Draft. I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been an essential part of my research, teaching, and training career at Loyola University Chicago School of Social Work at for the past 10 years. (Prior to coming to Loyola as a faculty member, I was a school social worker in the Chicago area for 14 years and saw first-hand how important and valuable PBIS could be for the students and families I served.) I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

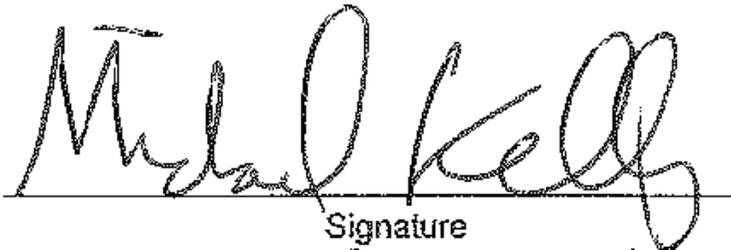
ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices

- Functional Behavioral Assessment - Behavior Intervention Plans (FBABIP)
- Check-In, Check-Out (CICO)
- Family Engagement
- Education Environment Practices
- Person-centered Planning Practices (wraparound, Care Coordination, etc.)
- School-Community Partnerships

I strongly support this work, and am happy to expand on my ideas further as needed, either by e-mail mkell17@luc.edu or by phone 708 204-0087. Thanks for the work you're doing for the students of Illinois.

Sincerely,



Signature

To: Melina Wright, ESSA Coordinator
Illinois State Board of Education

From: Dr. Brent Clark, Executive Director – Illinois Association of School Administrators
Mr. Roger Eddy, Executive Director – Illinois Association of School Boards
Mr. Jason Leahy – Illinois Principals Association
Dr. Michael Jacoby – Illinois Association of School Business Officials

RE: Proposed ISBE ESSA Draft Plan – Round 2

Date: December 27, 2016

The purpose of this letter is to provide feedback to the second draft of the Illinois Every Student Succeeds Act (“ESSA”) State Plan. Thank you in advance for your continued time and consideration.

Section 1: Consultation and Coordination

We, again, commend the Illinois State Board of Education (“ISBE”) for its extensive stakeholder involvement and deeply appreciate the multiple opportunities to help guide the development of the Illinois ESSA State Plan. It is clear that ISBE has heard our primary request to provide maximum flexibility to our local school districts and schools in the implementation of ESSA. Our hope is that this flexibility becomes a reality.

In Section 1 of the second draft, ISBE highlighted recent feedback from the field. There are two areas to which we would like to address. First, we oppose diverting funds for specific uses such as teacher residency programs. We renew our request that ISBE allow local flexibility to the greatest extent possible under the statutory language of ESSA and provide maximum opportunities for districts to receive and spend dollars in order to maximize the success of individual children. Second, we strongly agree with the comment that “equity in funding must come before accountability”. Although, we understand the parallel timeframe, we believe it is crucial to ensure equitable and adequate funding for our school districts and, until which time, we believe that any accountability system should have some reporting and/or other mechanism to account for funding inequities.

Section 2: Challenging State Academic Standards and Academic Assessments

ISBE highlighted feedback it received regarding the assessment(s) to be used in the Illinois ESSA State Plan. Although we continue to support local options, we understand the federal constraint. Our members will continue to push for the maximum flexibility. Given the impending expiration of the PARCC contract, we continue our request to work with ISBE and educational stakeholders through this process.

In the second draft, ISBE referenced multiple requests/concerns regarding assessments provided to English Learners and attainment of English Proficiency. We support and would like to be part of any working group regarding this important topic. We share in the necessity of developing native language assessments and would support that content assessments are made available in languages other than English when 30 percent or more of the English Learners speak the same language. We believe that there is much work to be done in this area and remain committed to assisting ISBE.

Section 3: Accountability, Support and Improvement For Schools

As to the accountability plan, we have been extremely active in sharing our comments and concerns. We continue to believe in a multi-measured approach that looks at both assessments, as well as the environment to which the student learn. We still strongly believe that to the extent possible the accountability plan should be within the schools' nexus of control.

We continue to support the following components for inclusion into the State Plan:

K-8

Required Indicators:

Proficiency
Growth
EL Proficiency

Other Potential Indicators:

IBAM Quality Framework*
Chronic Absenteeism
“On Track” Readiness
K-2 Readiness*

High School:

Required Indicators:

Proficiency
Graduation Rates
EL Proficiency

Other Potential Indicators

IBAM Quality Framework*
Chronic Absenteeism
9th Grade “On Track” Readiness
College and Career Pathways

As to the “Required Indicators”, we continue to work with educational and technical stakeholders to determine the best methods regarding proficiency and growth. As to growth, we commend ISBE’s work with technical advisory subgroup. We would continue to request that any model selected honor our guiding principles to which we submitted previously. As to graduation rates, we would request that any calculation include students that have completed Special Education Transition Services and students that graduate in four or five years. As to English Proficiency, we are concerned with the recommendation to drop the “n size” from 30 to 20, and would propose a compromise of 25.

As to the “other potential indicators”, we remain committed to the process of detecting the best indicators to provide a well-rounded “snap shot” of our schools. We renew our request that ISBE in its Draft Plan #3 continue to narrow the focus of this work and start to provide recommended definitions to each category in order to elicit feedback thereof. We strongly agree that there are several enumerated “other indicators” in the State Draft Plan that either (1) do not meet the federal statutory or regulatory definitions and should only be reported upon and not

included in the accountability system and/or (2) do not have statewide consensus of support. To the extent possible, we are hopeful that the State Draft Plan #3 will remove these so that educational stakeholders are able to provide meaningful feedback on a specific and defined set of indicators.

As to the IBAM Quality Framework, we commend ISBE's commitment to this crucial work. Although, we understand, in its current state, that there are both statutory limitations and fiscal/practical implications to its inclusion within the point accumulation of the accountability plan, we support and remain committed to finding ways through proxy or possibly additional federal flexibility to include this important work. To this end, we firmly believe that this Framework should be a tool that (1) is available to any school district to aid in its approach to systematic and continuous growth, (2) is used as a gateway to any services or funds to which a school district could/should receive through Illinois' system of support, and (3) upon validation, is a part of our accountability system, as evidence that is received from such work would meet the federal statutory and/or regulatory requirements. We renew our partnership and commitment to this work.

As to the College and Career Pathways, we thank ISBE for their willingness and commitment to work with educational stakeholders as evidenced by the inclusion of the College and Career Pathways. We believe that this allows for the greatest local flexibility at the local level. We do not believe it is necessary provide a Distinguished Scholar Designation, as if a local district would like to add distinguishing factors to the diploma then we support local flexibility to do so. In the end, we strongly believe that the College and Career Pathways should be included.

We support the inclusion of an attendance marker and readiness indicators, however, continue to hold specific recommendations until which time specific definitions are presented. We are working with a multitude of stakeholders. We strongly believe that to the extent possible, the goal of the accountability plan should be to highlight the successes of our students and districts, while recognizing weaknesses and targeting support where needed, instead of being punitive and negative. We, again, share our concerns regarding the inclusion of Illinois' current climate survey in the accountability plan. We do not believe the current climate survey administered meets the federal statutory and regulatory requirements. Climate surveys can be beneficial, but problematic as an indicator. Any climate survey used should not be mandated or costly. We think a better tool would be evidence obtained from the IBAM Framework upon its completion.

In response to the weighting of the indicators, we, again, implore ISBE to follow, to the greatest extent possible based on statutory limitations of ESSA, the spirit of HB 2683 (Public Act 99-0193). We favor including a large portion (as much as determined acceptable by definition after ESSA rule-making) of the new accountability system to continue to come from the "Other" Indicators (now 70% per Public Act 99-0193). Our schools are much more than student performance on assessments. We recognize that ESSA requires the statutory required indicators to be given greater weight than the "other" indicators. We continued to recommend a 51%/49%

split, thereby allowing the greatest percentage possible for “other” indicators while still adhering to the statutory limitations of ESSA.

Within the “required indicators”, we do not support equal weighting within Proficiency, Growth and English Proficiency. We reserve our recommendation regarding weights to Proficiency and Growth until which time they are defined, but believe that the majority of points should be provided to those two areas, with no more than 10-15% of the points assigned to English Proficiency. It is important to note that our English Language educational stakeholders are aligned to this recommendation. As to the “other potential indicators”, we again reserve our recommendation until which time these indicators are selected and defined.

Regarding Goal Setting, we agree with the Draft comments. We support that the long-term goals timeline should be six to eight years, while interim goals timeline should be a minimum of three years. We cannot stress enough the importance of appropriate and targeted supports at every level, which we believe are necessary to achieve both long- and short-term goals. We must continue to change the message at the state and local level, especially as we embark on a new funding model; systematic and meaningful change takes time and resources.

Regarding Aggregating Measures, we fully support avoiding negative terminology when expressing performance levels. We do not support a compare-and-punish model, but we do support a model that allows for districts and schools to “tell their own story.” Accordingly, we support directional arrows, as well support six levels of measures, five at a minimum. We suggest “sustaining growth toward meeting” as a possible middle (fifth) level.

Finally, as to ISBE’s request regarding how many years schools with a student group whose performance is on par or lower than the performance of the “all students” group in the lowest-performing 5 percent of schools should have to implement a school improvement plan before it is identified as requiring comprehensive supports and services, we support using a three-year span of data for improved reliability and that schools should have at least four years to plan and implement improvement plans. We also very much look forward more information on the IL-EMPOWER and very much appreciated the opportunity to participate in the very informative meeting last week regarding the introduction of it. We firmly believe that the IBAM Quality Framework is an essential cornerstone of the success of such a program.

Section 4: Supporting Excellent Educators

We support and clearly understand the need for professional learning opportunities for teachers and administrators in order to improve the effectiveness and quality of teachers and principals. We renew our support that principals and school leaders must be a renewed focus of the ESSA State Plan. We would request that ISBE remained committed to this.

As stated above, we are concerned regarding diversion of funds to specialty programs such as teacher residency. We renew our request that ISBE allow local flexibility to the greatest extent

possible under the statutory language of ESSA and provide maximum opportunities for districts to receive and spend dollars in order to maximize the success of individual children.

Section 5: Supporting All Students

We believe that we must maintain flexibility and provide the most comprehensive well-rounded and supportive education for all students. In response to the requested feedback, we agree that it is beneficial for districts to provide student support services. However, there must be reliable, adequate and sustainable funding for these services. We are concerned with portions of the plan due to lack of funding and staff shortages, specifically in Section 5.F. In this Section, it states mandatory additional staff at IEP meetings, we are concerned that this exceeds federal law and could be an unfunded mandate. We would want this to be included if educational and legally necessary. In the end, we must consider funding and capacity, often the expectation of student support services comes without funding and we must work together to change this moving forward.

Conclusion

Thank you for your consideration of the abovementioned. We will continue to provide feedback and engage in the process. We look forward to Draft #3 and the opportunity to continue to collaborate in this very important work.

McLean County Unit District No. 5

1809 West Hovey Avenue
Normal, IL 61761-4339

Office of the Superintendent

Phone: 309.557.4000
Fax: 309.557.4501
E-mail: district@unit5.org

December 20, 2016

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at McLean County Unit District No. 5 for the past decade. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (Wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,



Dr. Mark Daniel, Superintendent
McLean County Unit District No. 5

December 14, 2016

Dear ESSA Committee,

Promoting a love of reading is a top goal of my school and library media program. I am very fortunate to currently work in a district that has a long history of supporting and advocating for school libraries. However, this was not always true. Ten years ago, I was part of a Chicago public school that did not have a circulating library. The doors were locked and the books were left on the shelves collecting dust. I was a classroom teacher during this time, and because the library was closed, my students had very limited access to books. Additionally, test scores were low and the school was on academic probation. Knowing the impact a successful library program can have on student achievement, I inquired about and later accepted the librarian position. I am proud to say that I brought the library back to life. The students were excited about reading, library circulation was at a record high, test scores increased, and the school was removed from academic probation.

However, due to budget cuts, I was informed two years ago that the wonderful library program I spent eight years creating would be eliminated. In order to keep libraries in schools, additional attention and funding is greatly needed. All students, regardless of city or neighborhood, should have access to a quality library program and certified librarian.

Sincerely,

Emily Day
Media Specialist
Liberty School
8801 W. 151st Street
Orland Park, IL 60462
708-349-5353



Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223
Sent via email to essa@isbe.net

December 20, 2016

Dear Dr. Smith:

On behalf of over 250 endorsers supporting these recommendations ([list of endorsements attached](#)), thank you for allowing us to provide input on the Illinois plan for Every Student Succeeds Act (ESSA) Draft #2. The Office of Special Education Programs (OSEP) National Technical Assistance Center on PBIS reports 23,363 schools implementing PBIS nation-wide. The Midwest PBIS Network, formerly known as the Illinois PBIS Network, is a technical assistance hub of the National TA center and has a long history of supporting districts in Illinois to implement and sustain Positive Behavior Interventions and Supports (PBIS). In 2014, Illinois shifted funding to support PBIS implementation to a statewide technical assistance center (ISTAC now IL MTSS), and since that time LEA demand for dedicated technical assistance of behavior supports remains high. The Midwest PBIS Network continues to receive requests for training and support on implementing behavior supports within MTSS. Given the breadth of the requests in Illinois, the passing of SB100, and the direction of ESSA, the need for partnerships and funding is increasingly important. We would like to collaborate with ISBE and IL-EMPOWER to consider how partnering together in one system will help meet the LEA demand.

Midwest PBIS Network has continued to establish training and technical assistance opportunities to meet the district demands for behavior supports in MTSS. With our support over the past two years, 695 Illinois schools have measured the fidelity of their PBIS implementation, and over 600 schools have applied for and earned formal recognition of their behavior support efforts from bronze to platinum levels. A total of 1,070 Illinois schools in 193 districts are using resources supported by the Midwest PBIS Network (e.g. SWIS data system, assessments through PBIS Applications, technical assistance for coaching, etc.).

Over the past two decades, the research and development of PBIS has evolved from focusing on a multi-tiered framework solely for implementing behavior interventions and supports, to using the multi-tiered framework to organize supports for holistic student needs. Therefore we are very encouraged to see a strong emphasis on the whole child throughout Illinois's ESSA plan. Some research and demonstrations of the national and local implementation include:

- Embedding classroom management and bullying prevention strategies into Tier 1
- Integrating school-based mental-health into multi-tiered system of supports (i.e. Interconnected Systems Framework)
- Integrating restorative justice practices in the continuum of tiered supports
- Increasing family partnerships (Positive Family Support Model)
- Focus on alignment of systems and initiatives
- Updated tools for measuring fidelity of behavior support across all three tiers of MTSS
- Addressing disproportionality within discipline

As a hub of the OSEP National TA Center, Midwest PBIS Network is situated and ready to support ISBE in the development and implementation of their ESSA plan. The Technical Assistance Center on PBIS provides continued research to define, develop, implement, and evaluate a multi-tiered approach to improve the capacity of states, districts, and schools to establish, scale-up, and sustain the PBIS framework. While OSEP funds the National TA Center to focus on supporting the social emotional needs of students, much of the research conducted at the National TA Center actually focuses on structures for capacity and sustainability as well as integration of multi-tiered supports.

An example of the technical assistance resources from the National PBIS TA Center is the [Implementation Blueprint and Self Assessment](#) (2015, Oct 19), which guides MTSS teams in the assessment, development, and execution of their action plans. The components of the blueprint are consistent with the Illinois State Board of Education's [Quality Framework for Illinois School Districts](#) (2016, Aug 29), and provide districts and schools with a technical assistance model for informing the framework's indicators.

We appreciate ISBE providing the opportunity for comments on the draft of ESSA implementation plan. On behalf of over 1,000 Illinois schools currently accessing resources from the Midwest PBIS Network and National PBIS TA Center, we have three overall recommendations:

We have three overall recommendations:

- 1) Ensure all Illinois schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered system of supports (MTSS) framework
- 2) Use multiple measures for school climate within the proposed Accountability System as the School Quality Indicator
- 3) A partnership between ISBE, IL-EMPOWER, and the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

In addition to these three overall recommendations, the Midwest PBIS Network will send a second separate letter with more [detailed recommendations](#) aligning to Draft #2.

Over 250 educational professionals from across Illinois have endorsed these recommendations, including leadership from 40 districts, 50 schools, teachers, clinicians, faculty from five universities, the Illinois School Psychologists Association, Illinois Juvenile Justice Commission, and the Illinois Balanced and Restorative

Justice Project. Further, 12 individuals have informed us that they also [submitted their own letter](#) endorsing these recommendations.

We hope the breadth of growing research, resources, and networking available from the Midwest PBIS Network as a hub of the OSEP National PBIS TA Center will be used to develop and implement Illinois's ESSA plan. We look forward to collaborating with ISBE to implement their ESSA plan and improving outcomes for all students in Illinois.

Sincerely,

Sheri Luecking and Brian C. Meyer, Co-Directors
sheri.luecking@midwestpbis.org, brian.meyer@midwestpbis.org

SASED: [Midwest PBIS Network](#)
2900 Ogden Ave., Lisle, Illinois 60532

References

(2015, Oct 19). *Implementation Blueprint and Self-Assessment: For Local and State Education Agents*. OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports. Retrieved December 8, 2016, from <https://www.pbis.org/blueprint/implementation-blueprint>

(2016, Aug 29). *Quality Framework for Illinois School Districts - Illinois State Board of ...*. Retrieved December 8, 2016, from <http://www.isbe.net/BAMC/pdf/quality-framework-160829.pdf>

(2016, Nov 18). *ESSA State Plan Draft #2 - Illinois State Board of Education*. Retrieved December 8, 2016, from <http://www.isbe.net/essa/pdf/ESSA-Illinois-State-Plan-draft-2.pdf>

Endorsements

For the most up to date list of endorsements: <https://docs.google.com/spreadsheets/d/1wR1GYNq1WVTEeOXaHr0y-glgwMbUbMo69kM4Fgn-WnY/edit#gid=0>

(updated 12/19/16 5:00 pm)

| Count | Agencies and Higher Education | | |
|-------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| 1 | Rob Horner, Ph.D. | Co-Director National PBIS TA Center; Professor of Special Education and Clinical Sciences | OSEP National PBIS TA Center; University of Oregon |
| 2 | Miranda Johnson, J.D. | Associate Director, Education Law and Policy Institute | Loyola University Chicago School of Law |
| 3 | Michael Kelly, Ph.D. | Associate Professor, Family and School Partnership Program Director | Loyola University Chicago School of Social Work |
| 4 | Dan Maggin, Ph.D. | Associate Professor | University of Illinois at Chicago, Department of Special Education |
| 5 | Wendy Fuchs | Associate Professor, Project coordinator for the IHE Partnership (Integrating MTSS content into educator preparation programs in Illinois) | Southern Illinois University Edwardsville, Department of Teaching and Learning |
| 6 | Phillip Weishaar, Ph.D. | Associate Professor | Southern Illinois University Edwardsville, Department of Teaching and Learning |
| 7 | Brenda Coble Lindsey | Teaching Associate Professor | University of Illinois at Urbana Champaign, School of social Work |
| 8 | Mary Bragg | Adjunct Instructor | University of Illinois, School of Social Work; Champaign CUSD 4 (Retired) |
| 9 | Carrie Emrikson, Ed.D. | President | Illinois School Psychologist Association |
| 10 | Sara Balgoyen | Executive Director | Illinois Balanced and Restorative Justice Project (IBARJ) |
| 11 | Wendy Nussbaum | Executive Director | Illinois Juvenile Justice Commission |
| 12 | Judge George W. Timberlake | Judge (Ret) | Illinois Juvenile Justice Commission and Chairman; Federal Advisory Committee on Juvenile Justice |
| 13 | Shelly Davis | Commissioner | Illinois Juvenile Justice Commission |

| | | | |
|------------------------------|--------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 14 | Robert Hawkins, Ed.D. | School District Compliance Review Auditor | Kane County Regional Office of Education; Associate Superintendent West Aurora School District 129 (Retired) |
| 15 | Pat Dal Santo | Regional Superintendent | Kane County Regional Office of Education |
| 16 | Michael Volpe | Executive Director | School Association for Special Education in DuPage County (SASED) |
| 17 | Thomas L. Moline, Ph.D. | Superintendent | SEDOL Special Education District of Lake County |
| Districts and Schools | | | |
| 18 | Kristie L. Baumgartner | Assistant Superintendent | Alton CUSD 11 |
| 19 | Sonja Collins | School Social Worker | Alton CUSD 11 |
| 20 | Rene Hart | Assistant Principal | Alton CUSD 11, East Elementary School |
| 21 | Latasha LeFlore-Porter | Principal | Alton CUSD 11, Lewis & Clark Elem School |
| 22 | Betsy Prehn | School Climate Grant Coordinator, School Social Worker | Alton CUSD 11, Lovejoy Elementary School |
| 23 | Ron Murabito | Principal | Arbor Park School District 145, Arbor Park Middle School |
| 24 | Camille Hogan | Principal | Arbor Park SD 145, Morton Gingerwood Elementary School |
| 25 | Sage Hale | Principal | Arthur CUSD 305, Arthur Grade School |
| 26 | Julia Doverspike | Principal | Aurora East USD 131, Dieterich Elementary School |
| 27 | Doug Wood | Superintendent | Ball Chatham CUSD 5 |
| 28 | Jane Bagus | Assistant Superintendent | Berwyn South School District 100 |
| 29 | Beatriz Maldonado | Director of Language Acquisition | Berwyn South School District 100 |
| 30 | Ashley Schnittker | Instructional Support Coordinator, District Coach | Bloomington SD 87 |
| 31 | Erin Drone | Kindergarten Teacher | Brownstown CUSD 201, Brownstown Elementary School |
| 32 | Lisha Ledbetter | Teacher, Tier 1 and Tier 2 Coach | Brownstown CUSD 201, Brownstown Elementary School |
| 33 | Marisa Thomason | Aide, Team Member | Brownstown CUSD 201, Brownstown Elementary School |
| 34 | Tracey Alstat | LA Teacher, PBIS Coach | Brownstown CUSD 201, Brownstown Jr/Sr High School |
| 35 | Andrea Stibal | School Psychologist | Byron CUSD 226 |

| | | | |
|----|-------------------|-------------------------------------------------------------------|--------------------------------------------------|
| 36 | Zack Ettelbrick | Principal | Byron CUSD 226, Byron Middle School |
| 37 | Steven Stewart | Assistant Principal | Byron CUSD 226, Mary Morgan Elementary School |
| 38 | Buster Barton | Principal | Byron CUSD 226, Mary Morgan Elementary School |
| 39 | Meghan Skidmore | School Social Worker | Byron CUSD 226, Mary Morgan Elementary School |
| 40 | Pam Wirth | School Social Worker | Cahokia School District 187 |
| 41 | Melanie Tate | Special Education Teacher | Carbondale ESD 95 |
| 42 | Katrina Renzaglia | Special Education Teacher | Carbondale ESD 95, Parrish Elementary School |
| 43 | Michelle M. Boyce | School Social Worker | Carbondale ESD 96 |
| 44 | Julie Augustyn | Prevention Coordinator | CCSD 93 |
| 45 | Elizabeth Tibble | Reading Specialist, Tier 1 Coach | CCSD 93, Roy De Shane Elementary School |
| 46 | Nicole Garren | School Social Worker | Centralia HSD 200, Centralia High School |
| 47 | Jill Johnson | Program Coordinator | Champaign CUSD 4, ACTIONS Program |
| 48 | Greg Johnson | Principal | Champaign CUSD 4, Centennial High School |
| 49 | Suzanne Arnold | Special Education Teacher | Chicago Heights, SPEED SEJA #802 |
| 50 | Lena Izzo | School Social Worker, Behavioral Healthcare, Residential Services | Chicago Public Schools |
| 51 | Adrienne Porter | Principal | Chicago, Hillside Academy East |
| 52 | Anne Bauer | School Social Worker | Collinsville CUSD 10 |
| 53 | Aurora Tallerico | Speech Pathologist, Coach | Collinsville CUSD 10 |
| 54 | April Walker | School Social Worker | Collinsville CUSD 10 |
| 55 | Leah Corey | School Social Worker | Collinsville CUSD 10, Kreitner Elementary School |
| 56 | Jane Lawless | Kindergarten Teacher, Tier 1 Coach | Cons SD 158, Chesak Elementary School |
| 57 | Scott Rowe | Principal | Cons SD 158, Huntley High School |
| 58 | Erin Anderson | Director of Literacy and Social Studies | Crystal Lake CCSD 47 |
| 59 | Kelli Catini | Director of Special Education | Crystal Lake CCSD 47 |
| 60 | Agnes Deredowski | School Psychologist; District PBIS Coach | Crystal Lake CCSD 47 |
| 61 | Elizabeth Krotser | Social Worker, Concerned Parent | Crystal Lake CCSD 47 |

| | | | |
|----|-------------------------|-----------------------------------------------------------|-----------------------------------------------|
| 62 | Scott Kubelka | Assistant Superintendent of Student Learning | Crystal Lake CCSD 47 |
| 63 | Cindy Leli | Assistant Director of Special Education | Crystal Lake CCSD 47 |
| 64 | Amy Lilly | Assistant Director of Special Education, Concerned Parent | Crystal Lake CCSD 47 |
| 65 | Kelly Maher | Director of Math and Science | Crystal Lake CCSD 47 |
| 66 | Amy Mosquera | Director of Dual Language and ELL | Crystal Lake CCSD 47 |
| 67 | Lori Parrish | Director of Professional Development and Grants | Crystal Lake CCSD 47 |
| 68 | Kristin Schmidt | Assistant Director of Special Education | Crystal Lake CCSD 47 |
| 69 | Jeffry Prickett | Principal | Crystal Lake CCSD 47, Bernotas Middle School |
| 70 | Kirch Bess | Reading Specialist, Tier 1 Coach | CUSD 300 |
| 71 | Cheryl Frederickson | Director of K-12 SEL | CUSD 300 |
| 72 | Ginny Gilbert | School Social Worker | CUSD 300 |
| 73 | Courtney Kuzynowski | 2nd Grade Teacher | CUSD 300 |
| 74 | Emily Porto | School Psychologist | CUSD 300 |
| 75 | Amanda Stam | Kindergarten Teacher, Tier 1 Coach | CUSD 300 |
| 76 | Kara Todd | School Psychologist | CUSD 300 |
| 77 | Christine Tsohas | School Psychologist | CUSD 300 |
| 78 | Shawn O'Donnell | Science Teacher, Tier 1 Coach | CUSD 300, Dundee-Crown High School |
| 79 | Piper Stratton, Ed.D. | School Psychologist | CUSD 300, Dundee-Crown HS |
| 80 | Michelle Bannerman | Second Grade Teacher | CUSD 300, Hampshire Elementary School |
| 81 | Nathan Jarot | Principal | CUSD 300, Lake in the Hills Elementary School |
| 82 | Jean Washington | School Social Worker | CUSD 300, Meadowdale Elementary School |
| 83 | Mandy Thalhammer, Ed.D. | Match Coach, Tier 2 Coach | CUSD 300, Perry Elementary School |
| 84 | Robert Prusator | Superintendent | Dakota CUSD 201 |
| 85 | Anita Bicksler | 1st Grade Teacher, PBIS Coach | Dakota CUSD 201, Dakota Elementary School |
| 86 | Erin Bowers | Teacher | Dakota CUSD 201, Dakota Elementary School |
| 87 | Carmon Conderman | 3rd Grade Teacher, PBIS Co-Chair | Dakota CUSD 201, Dakota Elementary School |

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| 88 | Peggy Kieken | School Counselor | Dakota CUSD 201, Dakota Elementary School |
| 89 | Jeff Milburn | Principal | Dakota CUSD 201, Dakota Elementary School |
| 90 | Aimee Taylor | Kindergarten Teacher | Dakota CUSD 201, Dakota Elementary School |
| 91 | Eric Rankin | Principal | Dakota CUSD 201, Dakota High School |
| 92 | Juliane Fredericks | Director of Special Education, Principal | Diamond Lake SD 76 |
| 93 | Bhavna Sharma-Lewis, Ph.D | Superintendent | Diamond Lake SD 76 |
| 94 | Megan Sharp | Teacher, Tier 1 Coach | Diamond Lake SD 76, West Oak Middle School |
| 95 | Tami Broskow | School social Worker | District 158, Huntley High School |
| 96 | Laura Jenkins | Math Team Coach, PBIS Tier 1 Coach | District 158, Huntley High School |
| 97 | Karen Miller | School Counselor, Tier 2 Coach | District 158, Huntley High School |
| 98 | Anne Sharkey | Social Studies Teacher, PBIS Coach | District 158, Huntley High School |
| 99 | Hannah Kreps | Behavior Development Coach | East Maine SD 63 |
| 100 | Yvonne Flores | School Social Worker | Evergreen Park ESD 124, Southeast Elementary School |
| 101 | Shari Demitrowicz | Principal | Flossmoor SD 161, Serena Hills Elementary School |
| 102 | Lou Cavello, Ph.D. | Superintendent | Forest Park SD 91 |
| 103 | Julie Hantson | Assistant Director of Student Services, District PBIS Coach | Forest Park SD 91 |
| 104 | Lauren Heilbrunn, Ed.S. | School Psychologist | Forest Ridge SD 142, Jack Hille Middle School |
| 105 | Jeffry Sefcik | Principal | Fox Lake GSD 114, Stanton School |
| 106 | Jessica Larson | MTSS Coordinator | Freeport SD 145 |
| 107 | Christine Hodges | School Counselor, Tier 2 Coach | Freeport SD 145, Carl Sandburg Middle Sch |
| 108 | Nicole Bowers | Teacher | Freeport SD 145, Taylor Park Elementary |
| 109 | Svetlana Petrova, PhD | School Psychologist | Grant CHSD 124 |
| 110 | Megan Lavery | Writing Specialist | Grayslake CCSD 46 |
| 111 | Tami Kroc | Director of Pupil Services | Gurnee SD 56 |
| 112 | Debra Alexander | Principal (Retired) | Gurnee SD 56 |
| 113 | Dr. Susan Wings | Superintendent | Harrison School District 36 |
| 114 | Julie Theisz | School Social Worker | Harvard CUSD 50 |

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|-----|------------------------------|---------------------------------------------------------------|------------------------------------------------------------|
| 115 | Dave Ramsland | School Social Worker, Tier 2 Coach | Harvard CUSD 50, Crosby Elementary School |
| 116 | Caryn Redman | School Social Worker, Tier 1 Coach | Harvard CUSD 50, Crosby Elementary School |
| 117 | Taylor Koester | School Social Worker, Tier 1 Coach | Harvard CUSD 50, Harvard Jr High School |
| 118 | Lindsey Nicky | 6th Grade LA Teacher, Tier 1 Coach | Harvard CUSD 50, Harvard Jr High School |
| 119 | Andrew Nicky | Special Education Teacher | Harvard CUSD 50, Harvard Jr High School |
| 120 | Judy Floeter | Principal | Harvard CUSD 50, Jefferson Elementary School |
| 121 | Sally Haylock | Tier 2 Coach | Harvard CUSD 50, Jefferson Elementary School |
| 122 | Vicki Pilgard | Tier 1 Coach | Harvard CUSD 50, Jefferson Elementary School |
| 123 | Serdar Kartal | Principal | Horizon Science Academy Belmont Charter School |
| 124 | Allyssa Torretto | Special Education Teacher | Horizon Science Academy Belmont Charter School |
| 125 | Karen Sullivan, Ed.D. | Superintendent | Indian Prairie CUSD 204 |
| 126 | Gary Shaffer | School Social Worker | Jersey CUSD 100 |
| 127 | Jennifer Dominiak-Hering | Supervisor Student Support Services | Kankakee SD 111 |
| 128 | Felice S. Hybert | Assistant Superintendent of Curriculum and Instruction | Kankakee SD 111 |
| 129 | Joan Kittler | School Nurse Consultant | Lagrange Area Department of Special Education (LADSE) |
| 130 | Susan Coleman | Assistant Superintendent for Student Services | Lake Zurich CUSD 95 |
| 131 | Semaj Coleman | Assistant Principal | Lansing SD 158, Memorial Jr High School |
| 132 | Kurnain Scott | English Teacher, PBIS Tier 1 Coach | Lansing SD 158, Memorial Jr High School |
| 133 | Mindy Shomberg | Special Education Teacher, PBIS Internal Co-Coach | Lincolnwood Elementary School; Evanston/Skokie District 65 |
| 134 | Sara Gordon | School Social Worker | Marion CUSD 2 |
| 135 | Amy M. Sanders | Assistant Superintendent | Marion CUSD 2 |
| 136 | Megan Thompson | Teacher, Tier 1 Coach | Marion CUSD 2 |
| 137 | Kimberly E. Brave | Principal | Marion CUSD 2, Jefferson Elementary School |
| 138 | Cory Bushue | School Social Worker | Marion CUSD 2, Lincoln Elementary School |

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| 139 | Dr. Jerry O'Shea | Superintendent | Marquardt SD 15 |
| 140 | Denise Titus | Assistant Principal | Mattoon CUSD 2, Arland D Williams Jr Elem Sch |
| 141 | Iliana El-Khailani | Assistant Director of Student Services | Maywood District 89 |
| 142 | Keith Mahone | Assistant Principal | Maywood-Melrose Park-Broadview 89, Irving Middle School |
| 143 | Noel Abraham | School social Worker | Maywood-Melrose Park-Broadview 89, Lincoln Elementary School |
| 144 | Micah Miner | Assistant Principal | Maywood-Melrose Park-Broadview 89, Melrose Park Elementary School |
| 145 | Nancy Braun | ED Program Supervisor, District Coach | McLean County USD 5 |
| 146 | Jennifer Albracht | School social Worker | Menta Academy Belleville |
| 147 | Samuel Bonney | Program Director | Menta Academy Taylorville |
| 148 | Jennifer Alexander | Teacher, PBIS Coach | Menta Group Special Education Services, Country Club Hills Tech and Trade |
| 149 | Bridget Nolan | Assistant Director of Student Services | Mokena SD 159 |
| 150 | Eileen Parente | Director of Student Services | Mokena SD 159 |
| 151 | Anna Kirchner | Principal | Mokena SD 159, Mokena Elementary School |
| 152 | Cathy Lark | Interim Assistant Principal | Mokena SD 159, Mokena Elementary School |
| 153 | Eric Melnyczenko, Ph.D. | Assistant Principal | Mokena SD 159, Mokena Jr High School |
| 154 | Darcy Knez | Rtl/MTSS Reading Coordinator | Momence CUSD 1 |
| 155 | Shad Hansen | Principal | Montmorency CCSD 145 |
| 156 | Alex Moore | Superintendent | Montmorency CCSD 145 |
| 157 | Michael Saunders | Principal | Morton CUSD 709, Grundy Elementary School |
| 158 | Jodi Fatheree | School Counselor, Tier 1 Coach | Mount Vernon SD 80, Zaddok Casey Middle School |
| 159 | Julie Littlefair | Assistant Principal | Mt. Vernon Twp HSD 201 |
| 160 | Melinda Pierson | School social Worker | Murphysboro CUSD 186, Gen John A Logan Attendance Cntr |
| 161 | Tony Wilson | Principal | Murphysboro CUSD 186, Murphysboro High School |
| 162 | Mary Blossom | School social Worker | Murphysboro CUSD 187, Murphysboro Middle School |
| 163 | Nick Micensky | Principal | Naperville CUSD 203, Scott Elementary School |

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|-----|----------------------------|-----------------------------------------------------------|-------------------------------------------------------------|
| 164 | Jennifer Schemidt | School Psychologist | Naperville CUSD 203, Scott Elementary School |
| 164 | Tiffanie Jeffrey | IST Consultant - MTSS Program, Social Worker | North DuPage Special Education Cooperative |
| 165 | Laura Burdick | School Social Worker | North Pekin Marquette Heights School District 102 |
| 166 | Maureen Deely | Principal | North Shore SD 112, Wayne Thomas Elem School |
| 167 | Amie Reed | RTI Services | O'Fallon CCSD 90, Fulton Jr High School |
| 168 | Ryan Keller | Principal | O'Fallon CCSD 90, Laverna Evans Elementary School |
| 169 | Laura Hipkiss | Tier 1 Coach | O'Fallon District 90, Laverna Evans Elementary School |
| 170 | Michele Capio | Behavior Interventionist | Oak Park ESD 97 |
| 171 | Jennifer Pillion | RTI Teacher, PBIS Internal Coach | Oglesby ESD 125, Lincoln Elementary School |
| 172 | Heidi Vander Burgh | PBIS Coach | Okaw Valley CUSD 302 |
| 173 | Dave Snyder | Director of Curriculum | Orland SD 135 |
| 174 | Sharon Y. Alexander, Ed.D. | Assistant Director of Assessment, Data and Accountability | Oswego CUSD 308 |
| 175 | Sam LeDeaux | Assistant Principal | Oswego CUSD 308, Thompson Jr High School |
| 176 | Benicia M. Colón | School Psychologist | Palatine CCSD 15 |
| 177 | Laura Swanlund, Ph.D. | School Psychologist | Palatine CCSD 15 |
| 178 | Dr. David Lett | Superintendent | Pana CUSD 8 |
| 179 | Kim Hahnenkamp | 2nd Grade Teacher | Pana CUSD 8, Washington Elementary School |
| 180 | Karen Starr | Family Representative | Parent |
| 181 | Amanda Wetherell | Principal | Paxton-Buckley-Loda CUD 10, Clara Peterson Elem School |
| 182 | Joshua M. Didier | Principal | Paxton-Buckley-Loda CUD 10, Paxton-Buckley-Loda Jr High Sch |
| 183 | Michelle M. Coconate | Special Services Coordinator | Peoria PD 150 |
| 184 | Crystal Deterding | School Social Worker | Perandoe Special Education District |
| 185 | Susan Ditch | School Social Worker | Perandoe Special Education District |
| 186 | Jean Hentis | School Social Worker | Perandoe Special Education District |
| 187 | Cindy Ponder | School Social Worker | Perandoe Special Education District |
| 188 | Danna Valleroy | School Social Worker | Perandoe Special Education District |
| 189 | Jamie Taylor | School Social Worker | Princeton ESD 115, Bureau County Cooperative |

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| 190 | Jancye Hortenstine | Teacher, Tier 2 Coach | Ramsey CUSD 204, Ramsey Elementary School |
| 191 | Carol Sebian | School social Worker | Retired |
| 192 | Yvonne Lavin | Advanced Biology Teacher, PBIS Tier 1 Building Coach | Rich Twp HSD 227, Rich Central Campus High School |
| 193 | Brad Polanin | Assistant Principal | Riverton CUSD 14, Riverton Elem School |
| 194 | Alicia Sanders | Director of Pupil Personnel Services | Rock Island/Milan School District 41 |
| 195 | Amy Taucher | School Counselor, PBIS Coach | Round Lake CUSD 116, Magee Middle School |
| 196 | Dr. Jennifer Garrison | Superintendent | Sandoval CUSD 501 |
| 197 | Jeremy Jett | SEA President | Sandoval CUSD 501 |
| 198 | Julie Nolte | 3rd Grade Teacher | Sandoval CUSD 501 |
| 199 | Christine Taylor | Academic/Behavior Trainer | Sandoval CUSD 501 |
| 200 | Stephanie Thomas | MTSS (Multi-Tiered System of Support) Lead Trainer - Behavior | Sandoval CUSD 501 |
| 201 | Rhonda Benjamin | Principal | Sandoval CUSD 501, Sandoval Jr/Sr High School |
| 202 | Annie Gray | Principal | Sandoval CUSD 501, Sandoval Jr/Sr High School |
| 203 | Paul J Flaherty | School Social worker | SD 45 Dupage County |
| 204 | Pam Horn | MTSS District Trainer | SD U-46 |
| 205 | Janet Krambeer | English Teacher, Interventionist | SD U-46 |
| 206 | Laurie Summers | MTSS Training & Support Facilitator for SD U-46 | SD U-46 |
| 207 | Jason Wielgus | Social Studies Teacher | SD U-46 |
| 208 | Anne Herrmann | Science Teacher, Tier 2 Team | SD U-46, Abbott Middle School |
| 209 | Jerilyn Hofmann | MTSS Middle School Site Lead | SD U-46, Canton Middle School |
| 210 | Kate Bieschke | MTSS Lead Teacher | SD U-46, Eastview Middle School |
| 211 | Perry Hayes | Principal | SD U-46, Ellis Middle School |
| 212 | Melissa McKee | MTSS Lead Teacher | SD U-46, Ellis Middle School |
| 213 | Kimberly Kowall | Interventionist | SD U-46, Illinois Park Elementary School |
| 214 | Jessica Goldstein | School Social Worker | SD U-46, Kenyon Woods Middle School |
| 215 | Jason Misicka | MTSS Coach | SD U-46, Kenyon Woods Middle School |
| 216 | Kim Rudden | Teacher, Tier 1 Coach | SD U-46, Kenyon Woods Middle School |
| 217 | Jaime Cadengo | Assistant Principal | SD U-46, Kimball Middle School |

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| 218 | Anne Hitch | MTSS Lead Teacher | SD U-46, Kimball Middle School |
| 219 | Johanna Medrano | School Nurse | SD U-46, Kimball Middle School |
| 220 | Marybeth Seymour | Science Teacher, AVID teacher, CICO Coach | SD U-46, Kimball Middle School |
| 221 | Brian Moran | Principal | SD U-46, South Elgin High School |
| 222 | Allison Haboush | Teacher of the Deaf and Hard-of-hearing | SD U-46, Streamwood High School |
| 223 | Shannon Henderson | MTSS Site Coordinator | SD U-46, Streamwood High School |
| 224 | Peggy Phillips | Counselor, MTSS Tier 3 Coach | SD U-46, Streamwood High School |
| 225 | Ginka Poptcheva | ELL Teacher | SD U-46, Streamwood High School |
| 226 | Robert Kirch | MTSS Lead Teacher | SD U-46, Tefft Middle School |
| 227 | Tammy Boggio | School Psychologist, External Coach | SEAPCO / Pleasant Valley District 62 |
| 228 | Amy Bobe | School Social Worker | South Eastern Special Education Cooperative |
| 229 | Barb Daugherty | Regional Director | Southern Illinois Special Education Services - The Menta Group |
| 230 | Priscilla Boyd | School Social Worker, PBIS Coordinator, Tier 2/3 Coach | Southwest Cook County Association for Special Education |
| 231 | Mark Skertich | Superintendent | Southwestern CUSD 9 |
| 232 | Peg Mitchell | Dean of Students | Southwestern CUSD 9, Southwestern High School |
| 233 | Sarah Brennfleck | School Social Worker | Sparta and Steeleville, Perandoe Special Education District |
| 234 | Dr. Tgichona G. Martin | External Coach | Special Education Services - The Menta Group |
| 235 | Lena Ayala-Martinez | Intervention Specialist | SPEED S.E.J.A. #802 |
| 236 | Annaelise Anderson | School Social Worker | Springfield SD 186 |
| 237 | Jennifer Gill | Superintendent | Springfield SD 186 |
| 238 | Kelly Sholtis | Braided Behavior Support Coordinator | Springfield SD 186 |
| 239 | Carly Thomas | School Social Worker | Springfield SD 186, Butler Elementary School |
| 240 | Sarah Van Aken | School Social Worker, Coach | Springfield SD 186, Dubois Elementary School |
| 241 | Amanda Naumovich | Speech-Language Pathologist | Springfield SD 186, Early Learning Center |
| 242 | Keith Kincaid | Principal | Springfield SD 186, Sandburg Elementary School |
| 243 | Cindy Martsch | School Social Worker | Springfield SD 186, Sandburg Elementary School |

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| 244 | Jenny Dykeman | School Counselor | Sterling CUSD 5, Washington Elementary School |
| 245 | Leslie DeBoer | Director of Special Education | Summit Hill SD 161 |
| 246 | Nancy Ganci | Principal | Taylorville CUSD 3, Memorial Elementary School |
| 247 | Jill Feltmeyer | School social Worker | Tri-County Special Education Joint Agreement |
| 248 | Amanda Klousnitzer-Hutchens | Literacy Interventionist, PBIS Coach | Urbana SD 116, Leal Elementary School |
| 249 | Spencer Landsman | Principal | Urbana SD 116, Leal Elementary School |
| 250 | Candace Gwin | Principal | Urbana SD 116, Wiley Elementary School |
| 251 | Prudence Kuming | School Social Worker | Waterloo Junior High School, Perandoe Special Education District |
| 252 | Meagan Dwyer | Director of Special Services | Wauconda CUSD 118 |
| 253 | Caitlin McMurray | Assistant Director of Social Emotional Learning and Related Services | Waukegan Public Schools District 60 |
| 254 | Galen Thomas | School social Worker | Williamson County Special Education District (Retired) |
| 255 | Lori Casey | Associate Superintendent of Education | Woodland CCSD 50 |
| 256 | Yolanda Fulton | Assistant Principal | Woodland CCSD 50 |
| 257 | Trina Metz | Assistant Principal | Woodland CCSD 50 |
| 258 | Ashley Campbell | PE Teacher | Woodland CCSD 50, Woodland Middle School |
| 259 | Tiffany Campbell | PE Teacher, CICO Coach | Woodland CCSD 50, Woodland Middle School |
| 260 | Mike Moan | Superintendent | Woodstock CUSD 200 |

ESSA – College *and* Career Ready for Every Student

Title I

Well-rounded Education: A main point of emphasis in ESSA is ensuring that every student receives a “Well-rounded Education” (formerly known as core academic subjects). Career and Technical Education (CTE) is now included as part of the statutory definition for a “Well-rounded Education.” CTE’s inclusion in this definition will open up new opportunities for states and LEAs to use ESSA funding for CTE programs and activities.

Adoption of the Postsecondary and Career Expectations (PaCE) framework outlined in the Postsecondary and Workforce Readiness Act (PWR) into the State of Illinois’ ESSA plan is essential for every student in Illinois, and will provide the opportunity for every student to truly be college and career ready by providing actual opportunities for *each* student to explore careers, not just participate in extra-curricular activities. Inherent in the definition of a “Well-rounded Education” is STEM education, which is now at the forefront of most educational initiatives. It is important to remember that STEM has four letters and it is most effective when *all four areas are integrated and applied*. CTE is traditionally the “T” and “E” in STEM, but includes rigorous science and mathematics utilized in real-world applications, which makes learning come to life for students. (Also see Title IV.) Many CTE programs, such as Project Lead the Way (PLTW) pre-engineering courses, and Geometry in Construction, have substantive data on improving students’ math and science scores. CTE also has been shown to substantially increase graduation rates, particularly for students who complete three or more CTE classes.

States *must* demonstrate in their state plans that their “challenging academic standards” are aligned with state CTE standards. State ESSA plans *must* be developed in coordination with the state’s Carl D. Perkins Act plan and, at the local level, applications must be submitted in coordination with a local Perkins plan, as appropriate.

Title II

Funds may now be used for professional development for educators for integration of CTE and academics and transitions to post-secondary and careers. NSERVE has sponsored professional development in Geometry in Construction and Algebra I in Manufacturing Processes, Entrepreneurship and Design, both aligned to the Common Core. Our Programs of Study are targeted to helping students make informed postsecondary career decisions while having the opportunity to explore careers while in high school. ***This should be available to every student in Illinois.***

Title IV

Funds may now be used towards college and career counseling, guidance, planning, and career exploration activities. This could best be done through CTE courses (including internships) for every student, and use of software programs (often purchased through Perkins funds) such as Career Cruising and Inspire. Funds may also be used towards supporting the improvement of STEM instruction and student engagement in STEM subjects. This could supplement and expand current use of Perkins funds for programs such as PLTW’s K-12 STEM programs, which are aligned to the Common Core and Next Generation Science Standards.

December 21, 2016

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777
essa@isbe.net

RE: Comments on the second draft of ISBE's ESSA State Plan

To Whom It May Concern:

The Ounce of Prevention Fund ("the Ounce") appreciates the opportunity to offer feedback on the second draft of the Every Student Succeeds Act (ESSA) Illinois State Plan. ISBE incorporated many of the Ounce's recommendations during the last comment period, and for that we are grateful. Below we offer a number of additional edits and suggestions to consider.

As we stated in our previous submission, the new law includes a number of important early learning provisions and references designed to encourage and enable states and school districts to strengthen connections between early learning and K-12. The development of the ISBE state plan presents an opportunity to maximize the impact of these early learning provisions on student outcomes in Illinois. Our comments are organized by section.

Section 1.2 Coordination

- Under 1.2A (page 7), we suggest the following edit: "ESSA provides the ideal opportunity for ISBE to coordinate the funding and administration between different federal programs. In the development of the state plan, for instance, the braiding between IDEA Parts B and D and Federal Statewide Systems of Support dollars has provided for the development and funding of its statewide multi-tiered system of support (IL-EMPOWER). So, too, the development of the ESSA State Plan has supported collaboration with the Carl D. Perkins Career and Technical Education Act of 2006 and Career and Technical Education through the development and implementation of career pathways for students in order for them to leave high school, college and career ready. Those involved with the state's early learning system have decades of experience coordinating and administering state and federal programs. The braiding and blending of funds is often quite complex, and when done improperly it can create barriers for families trying access high-quality programs. Because early learning providers and system leaders know the benefits (and pitfalls) of combining the funding and administration of distinct early childhood programs first hand, ISBE should consult with the [Illinois Early Learning Council](#) if and when the agency discusses future blending and/or braiding opportunities."

Section 2.1 Challenging State Academic Standards

- Under 2.1C (page 9-10), students in Illinois are identified as English Learners (ELs) upon entering the school system, according to the Early Childhood Education Mandate for bilingual education. Parents fill out a home language survey and early childhood students are assessed to determine their placement and required services to ensure academic success. We suggest inserting the following paragraph somewhere after the "2.1Ciii" bullet point: "Illinois should maintain the current practice of identifying ELs early and providing quality early childhood education that

matches a child's cultural and linguistic needs. It is vital to consider native language screening and assessment in early childhood settings; teachers will not capture a full understanding of a student's knowledge and skills if they only assess children in the language in which they are least proficient. These suggestions align with recommendations approved by the Illinois Early Learning Council.

Also under 2.1C (page 9-10), ISBE should encourage districts to assess language skills for incoming kindergarten students identified as ELs by promoting local district use of the English Language Development and Spanish Language assessment domains developed as part of the Kindergarten Individual Development Survey (KIDS).

Section 2.2 Academic Assessments

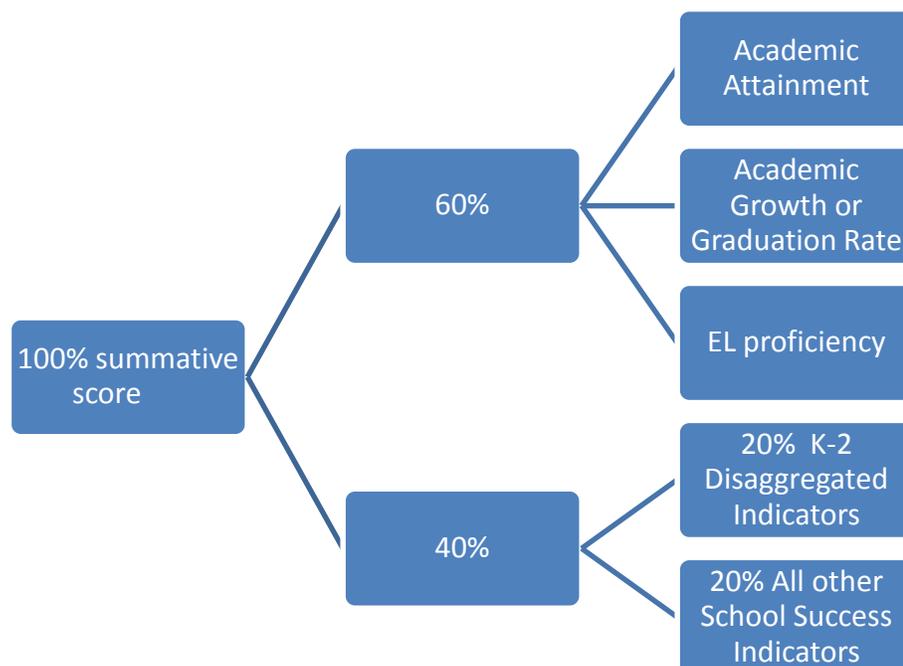
- Under 2.2A (page 10-14), we suggest including the following sentence somewhere within the Student Academic Assessments section (2.2A): "When possible, data on student progress and achievement will be disaggregated by the number of years a student has been in an EL program.
- Under 2.2Aiv (page 11-13), we suggest including the following sentence: "ISBE will consider ongoing tracking of ELs' academic achievement beyond the point in time the student is considered English language proficient."
- Under 2.2Eii (page 16), we thank ISBE for acknowledging the stakeholders' suggestion that content assessments be made available in languages other than English when 30 percent or more of the English Learners speak the same language. We would note, though, that it is also important for ISBE to ensure staff able to adequately support a student in his/her native language is present to provide the necessary guidance and support prior to and during administration of assessments. Communication of such assessments, which includes background information and methodology, should also be made available to the student's family in their native language.
- Under 2.2G (page 17), we thank ISBE for adding the language "developmentally appropriate" and "culturally and linguistically competent" to the assessment section.

Section 3.1 Accountability System

School Success Indicator

- Under Indicators (p. 32), we support the inclusion of chronic absenteeism (defined as missing more than 10 percent of school days) as an indicator. We believe indicators should be clear, fair, developmentally appropriate, and actionable by school administrators – that is, not simply proxies for a school's poverty rate. We believe chronic absenteeism meets that standard, and also has the important value of being measurable prior to third grade. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.
- Under weighting of indicators (pp. 33-36), we support disaggregating all indicators that can be disaggregated by grade, and having those indicators that can be measured directly in K-2 count for at least half of the School Success Indicator score for all elementary schools (at least 15%). To demonstrate what we mean we have adapted the graphic used by ISBE to demonstrate the

allocation of a 60/40 balance between assessment-based indicators and School Success Indicators for an elementary school, as shown on the next page.



This suggestion aligns with recommendations approved by the Illinois Early Learning Council and the P-20 Council's Data, Assessment, and Accountability Committee.

- ISBE has raised the possibility of developing a more focused K-2 accountability indicator. We fully support the development of such an indicator, which has also been recommended by the Early Learning Council. We recognize that this indicator cannot be developed thoughtfully prior to the April deadline for ESSA plan submission, but look forward to working with ISBE to develop this indicator in the years ahead. We note that the Ounce is participating in a Council of Chief State School Officers-sponsored work group to develop K-2 indicators, and believe this work could support Illinois' efforts in 2017 and beyond.

English Language Proficiency

- In the discussion of Languages Other Than English (3.1E, pp. 16-17), the draft acknowledges the annual measure of English language proficiency as a key element to the accountability system; it is one of the mandated indicators. States must report on both the percent of students who become proficient on the ACCESS assessment in a given year along with the growth students make towards proficiency in grades 3-12. Currently, all ELs in Illinois in K-12 are assessed annually. The WIDA Consortium reports that some of the greatest growth occurs in K-2. Given that higher rates of growth in English tend to occur in the early grades, ISBE should include data from K-2 when reporting on the indicator at the school level. ISBE should also include all ACCESS 2.0 data K-12 when reporting on the EL Indicator for accountability purposes.

The ISBE draft plan #2 points to the inclusion of academic indicators in English Language Arts and Math. Currently, the English Language Arts exam is only available in English. Fostering

instruction in a child's home language is critical in the early learning and K-2 years, as it is a means of building content knowledge that contributes to children's achievement on content exams conducted in English. In accordance with research, the language of instruction should always match the language of the assessment. When content assessments in 3rd grade and up are only available in English, there can be a tendency to shift from home language instruction to English as early as 1st grade—even when this is contrary to best practice—in order to meet the English language demands of the assessment.

Title I regulations call for states to make every effort possible to offer academic content assessments in languages other than English when 30 percent or more of English learners speak the same language. ISBE should develop home language assessments along the Prek-12 continuum – including assessments prior to third grade whose results would not be used directly for accountability purposes -- to ensure quality language and literacy development for ELs. This would also ensure the provision of valid and reliable data for measuring student growth. ISBE should offer native language content exams for language arts and science as part of a suite of state of approved assessments for accountability under ESSA.

- In the discussion of the growth model and indicator weighting (pp. 23-26), English learner growth toward English proficiency is a more reliable indicator of student success, as it allows the state to account for the diversity of the subgroup. In order to adopt a rigorous growth to proficiency model, ISBE must define the exit criteria for transitioning from EL status, articulate a specific timeline, take into account baseline data and calculate growth trajectories.

Illinois is a member of the WIDA multistate consortium. WIDA analysis of data from multiple states suggests that EL growth toward English proficiency is non-linear. There are three important variables considered in the recommended Growth to Proficiency model: grade level of the student K-12, starting level of proficiency, and the time it will take to reach the scale score, which equates to a 5.0 overall composite. Below are the specific recommendations for the EL subgroup and the accountability indicator under ESSA:

- ISBE should define the statewide exit criteria for transitioning from EL status to be an overall composite of 5.0 on ACCESS 2.0. (The scale score for reaching a 5.0 composite varies by grade level K-12)
- ISBE should adopt a 5 year timeline for reaching English language proficiency and for calculating appropriate growth. The 5 year timeline will begin in grade 1, which is the first grade of mandatory attendance in Illinois.
- ISBE should develop the WIDA Consortium recommended -Growth to Proficiency model for reporting data at the school level.
 - WIDA contends that a rigorous GTP model will suffice for reporting on the EL indicator, according to federal regulations. Accordingly, this is the desired option.
 - If ISBE chooses to report on both growth and the number of students reaching English proficiency in a given year, the data must include all students in grades K-12. ISBE should weight the growth portion of the indicator at 80% and the number of students reaching proficiency should be evaluated in terms of the state average, which would comprise the remaining 20%.

- ISBE should report on the number of EL students enrolled in a school K-12 achieving the appropriate growth on the annual exam.

Section 3.2 Identification of Schools

- Under 3.2A (page 42), we agree with the sentence: “ISBE believes increased student outcomes should be aligned to the totality of the state’s accountability system, not a single assessment or measure. The final federal accountability rules make clear that “student outcomes” does not need to mean only assessment results. The same is true for 3.2B (page 44).
- Under 3.2B (page 44), we suggest the following change: “That a school, in addition to no longer meeting the eligibility for comprehensive support and improvement, has established an improvement trajectory for the identified student demographic group to bring its performance into alignment with the state’s long-term goals.” Because the term “growth” is used frequently to refer to improvements on assessment results, we believe the term “improvement” will more precisely convey what we believe is the intent of this paragraph: the school needs to show improvement in student outcomes, whether those outcomes are assessment-based or not. An equivalent change might also be appropriate under 3.2A (page 42), although that language makes more specific reference to “attainment” than the language of 3.2B.
- Under 3.3A (pages 46-47), we support ISBE’s proposed approach. We would ask ISBE to clarify and specify that “the level of ‘need’ of the school and district” can include the level of need for improved early learning services, if the needs assessment demonstrates that the school’s kindergarteners are entering the school below grade level. This criterion is relevant to prioritizing among elementary schools within the lowest 5% of overall performance. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.
- Under 3.3B (pages 47-48), we ask ISBE to specify that the school-level needs assessment will include early learning. We suggest the following additional text: “The school level needs assessment for elementary schools will include information about the landscape of early childhood programs -- including its resources, strengths, and weaknesses – drawing on information from existing needs assessments, including those from Head Start; population information; a description of the landscape of the early childhood opportunities (including data on quality and access) for children in the catchment area of the school; and child assessment data from kindergarten entry through third grade.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.
- Under 3.3C (pages 48-49), ISBE require that the description of interventions include the following: “Where a needs analysis demonstrates that a significant challenge in a school is that children are entering kindergarten behind, school improvement resources may be targeted toward improved school readiness interventions that meet the ESSA requirements for rigor. Strategies for improving school readiness may include both programs implemented directly by the district and programs implemented primarily by community partners, with the exact mix of services to be dictated by community needs. Schools can look at both increasing access to and improving the quality of existing early learning programs.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Section 4.1 Systems of Educator Development, Retention, and Advancement

- Under 4.1A (page 51), we suggest the following edit: “Align the process of auditing approved PD providers with the definition of “professional development” as defined by Learning Forward and remove provider approval status from those providers not in compliance with the definition. Early learning should be included in the professional development alignment.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Also under 4.1A (page 51), we suggest the following edit: “Establish an annual PD audit. The first provider audit process will begin in the fall of 2016. Early learning should be included in the audit.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Still under 4.1A (page 51), the State Plan calls for a description of “the state’s system to ensure adequate preparation of new educators, particularly for low-income and minority students.” In working to meet these requirements, a targeted investment could be made in efforts that will work towards the linguistic and racial/ethnic diversification of the teaching workforce. We suggest inserting the following section after the first paragraph (“In addition to completing...”) on page 51: “While the state places teacher candidates in diverse student teaching settings, this should not be limited to the teaching candidate. Upon certification and licensing, Illinois should invest in a system that incentivizes already-certified and licensed teachers to hold stable, non-temporary, or short-term contracts in low-income and minority communities. Furthermore, there should be specific focus on recruitment of experienced teachers, so that schools in these communities are not inequitably left with staff that has relatively little to no experience.”

Further under 4.1A (page 51), we also suggest inserting the following section after the second paragraph (“All programs must align...”) on page 51: “The education sector should look to form partnerships to establish sector-based workforce development programs that are offered in minority and low-income communities – such as those within the nursing and manufacturing sectors. These programs could create a pipeline for there to be increased diversification moving through the education career pathway. Preparation programs need to be accessible to non-traditional students who may not be able to enroll as full-time students, have limited transportation, and/or have varied work schedules if currently employed. Additionally, programs should be equipped with sufficient supports that will adequately orient and guide individuals through their preparation program and the state licensing and certification system.”

Finally, under 4.1A (page 52), we suggest inserting the following section after the description of IL-EMPOWER: “Preparation coursework and ongoing professional development opportunities should include focus areas of cultural competency, cultural responsiveness, and anti-bias approaches. Trainings on implicit biases associated with race/ethnicity, ability, and national origin/immigration should be provided to instructional and administrative staff. Doing so would help diminish and address those implicit biases which have been shown to impact teachers’ expectations of students and the engagement of their parents/families, perceptions of student and parent behaviors, and students’ own perceptions and beliefs.”

Section 4.2 Support for Educators

- We agree with the Department of Education that it is critical to use federal funds to support state-level strategies designed to increase student achievement, improve the quality and effectiveness of school leaders, and provide at-risk children greater access to those effective school leaders. The early learning community has developed and implemented a number of methods designed to improve the quality and effectiveness of teachers, principals, and other school leaders, a few of which are highlighted below. As with our first set of comments, these recommendations are meant to build on ISBE's articulated approach and emphasize the importance of teachers who can meet the full range of a child's developmental needs, and leaders who can provide job-embedded professional support to those teachers.
- Under 4.2 (page 53-54) we thank the agency for committing to equipping school leaders, both teachers and principals, to act as instructional leaders, particularly for teachers in the early grades. We also thank ISBE for highlighting family and community engagement and behavioral health issues, among others, as proposed uses of Title II funds.
- Under 4.2A (page 52-54), we suggest inserting the following language: "Professional learning opportunities provided to districts, especially those identified for comprehensive services, should include strategies regarding family and community engagement, as well as the use of referral mechanisms that link children to appropriate services. In addition, districts should be encouraged to work with local and regional collaborations, such as those funded through AOK Network, the state's preschool expansion grant and the Maternal, Infant and Early Childhood Home Visiting (MIECHV) program." These suggestions align with recommendations approved by the Illinois Early Learning Council.
- Under 4.2 (page 54), we suggest the following addition: "Title II professional development resources can be most effective when used to support the alignment of learning environments during the early childhood and early elementary grades, when the trajectory of a child's learning can best be impacted. Title II funds should be used in the following ways: 1) develop sequenced curricula, instructional expectations, and appropriate assessments between early childhood and early elementary classrooms; 2) promote age appropriate quality instruction in the early grades that enhances principal's knowledge of play- and activities-centered learning environments that engage students and supporting teachers in shared lesson planning, analysis of assessment data, and problem-solving; and 3) focus attention and resources on student-based early learning and K-2 environments to strengthen learning in subsequent tested grades. These suggestions align with recommendations approved by the Illinois Early Learning Council.
- Under 4.2B (page 54), [ESSA provides opportunities](#) to expand high quality inclusion within early childhood settings. [Research shows](#) that attitudes and beliefs are often the biggest barrier to preschool inclusion. To reduce disparities in outcomes for children with disabilities, we must ensure that the professionals serving them in both school-based and community-based programs have the competencies and confidence to support them. This requires not only ensuring that children can enroll in all early childhood programs, but also that we have cross-sector professional development and embedded coaching and support. These suggestions align with recommendations approved by the Illinois Early Learning Council.

Also under 4.2B (page 55), we suggest the following sentence following the bullet points on page 55: "ISBE will work to ensure that existing data systems and supports for improvement (Ed360,

Online Impact, etc.) include data, assessments, and supports that are developmentally appropriate for leaders and teachers responsible for preschool-aged students.

Section 5.1 Well-Rounded and Supportive Education for Students

- Under 5.1A (page 57), we applaud ISBE for recognizing that learning begins at birth and acknowledging the Illinois Birth – 5 Program Standards and the Illinois Early Learning and Development Standards (IELDS) in the plan. We encourage ISBE to consider taking additional steps in the early years and grades that would strengthen the birth—grade 12 continuum, including implementing policies to guide transitions from birth to three services into preschool and Head Start programs, and then from these programs and services into kindergarten. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Also under 5.1A (page 57-60), we thank ISBE for incorporating a number of our suggestions, including: 1) acknowledgement of the state’s strong commitment to high-quality early childhood programs for children under the age of three and their families; 2) adding parental education below bachelor’s degree, little/no shared reading at home, food insecurity, and fair/poor parental health as four variables associated with both academic and behavioral risk; 3) adding counselors and mental health staff to the list those involved in Response to Intervention; and 4) clarifying that interventions should include supports for school leadership and job-embedded professional learning.

- Under 5.1B (page 60-62), we thank ISBE for incorporating a number of our suggestions, including: 1) adding effective and inclusive leaders, ambitious instruction, collaborative teachers, supportive environment, and involved families to the list of “necessary conditions for learning”; 2) adding homelessness or instability in a living situation and lack of or insufficient number of behavioral health supports in a school environment (such as counselors or social workers) to the list of “barriers to learning”; and 3) adding use of early childhood mental health consultation, family support, and inclusion specialist to the list of “early intervention and identification strategies and supports.”

Also under 5.1B (page 60-61), we suggest the following edit: “Equitable access to a well-rounded education, beginning in early childhood education, in subjects such as English, reading/language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, history, geography, computer science, music, career and technical education, health, physical education, and any other subjects, in which female students, minority students, English Learners, children with disabilities, and low-income students are underrepresented;...”

Still under 5.1B (page 60), we believe that to be effective in addressing the needs of the whole child regardless of setting, it is critical that all students, beginning at the early childhood level, have access to school nurses, guidance counselors, social workers, mental health professionals, and other resources to address child health in their programs. Please refer to the Illinois Early Learning Council's [Proposed Plan for Integrating Health into Early Care and Education Systems](#).

Finally under 5.1B (page 61), we appreciate ISBE’s commitment to addressing barriers and providing supports for young people who are struggling. We recommend specific assurance that

ISBE will provide access to high quality early learning programs and wraparound services that are targeted to underserved communities with persistent poverty. A body of research supports that high quality early learning programs significantly improve academic achievement for children of color and/or children living in poverty. Children living in these communities may also be exposed to higher levels of violence, trauma, and toxic stress. For them to feel safe and achieve in school they will need a trauma informed school climate with professionals that are prepared to support their learning.

- Under 5.1C (page 62-63), we thank ISBE for committing to support local school districts in addressing issues of racism, implicit bias, and micro-aggressions and provide guidance on collecting and analyzing data around school discipline, particularly in assessing for disproportionalities. We also thank the agency for including our suggestion around the use of Title IV, Part A (Student Support and Academic Enrichment Grants), Part B (21st Century Community Learning Centers), and Part F funds (Promise Neighborhoods and Full-Service Community School Programs).

Also under 5.1C (page 62), we suggest beginning the section by referring to the preschool expulsion and suspension rates that disproportionately impact low-income students of color and set a trajectory for future school failure. All state-sponsored early childhood education programs should be required to develop behavior intervention policies, which are developmentally and culturally appropriate for the early learner. Further, ISBE should require programs to collect data around suspension and expulsion and address any disproportionalities. ISBE should support programs in recognizing and addressing implicit bias. Some possible statistics to include:

- Recent studies have shown that expulsion of children in early care and education (ECE) settings is occurring at alarmingly high rates, in particular among certain racial and gender groups. This phenomenon is particularly troubling given that research suggests [that school expulsion and suspension practices are associated with negative educational and life outcomes](#).
- The first nationwide study to focus specifically on preschool expulsion found that [preschoolers were expelled at more than three times the rate of K-12 students](#). A study completed in 2005 indicated that while Illinois reported the sixth-lowest expulsion rate of the 40 states surveyed, there still were three times more pre-kindergartners expelled than their older peers: 2.7 per 1,000 preschoolers, compared with 0.96 per 1,000 children in K-12.
- [A study conducted in 2002 in Chicago](#) showed an even higher rate of expulsion in that city, particularly in infant-toddler programs, with over 40% of child care programs asking a child to leave because of social-emotional and behavioral problems, with the most challenging behaviors being biting, hitting, and aggressive behavior.
- Recent data from the Department of Education show [that African-American boys make up 18% of preschool enrollment, but 48% of preschoolers suspended more than once](#).
- Other research indicates that while Hispanic and African-American boys represent only 46% of all boys in preschool, these children represent 66% of preschool boys suspended. Furthermore, although they represent only half of the population, [boys make up 79% of preschoolers suspended once, and 82% of preschoolers suspended multiple times](#).

- Under 5.1C (page 62-63), we suggest that ISBE should provide practitioner-led professional development and additional resources for social-emotional screening and behavioral health intervention at the early childhood level.

Also under 5.1C (page 63), we suggest inserting the following sentence: “Schools should provide resources by connecting students and families to support services they need, including SNAP, TANF and All Kids, therefore creating a more supportive environment for learning and decreasing absenteeism.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

- Under 5.1D (page 63-64), we suggest adding a fourth strand of technology work. The fourth strand of work involves providing guidance to early childhood education programs. To address digital literacy of all students, ECE student access to technology and the integration into student learning will be developmentally appropriate and follow the joint guidelines from the U.S. Department of Education (DOE) and Department of Health and Human Services (HHS).
- Under 5.1E (page 65), we suggest adding the following to the shared definition of family engagement developed by the intra-agency team: “Parent and family engagement must be collaborative, inclusive, culturally and linguistically responsive, and conducted at a time when guardians and caregivers can participate. Engaging families is especially crucial in the early years of learning as it sets the foundation for young children in their development.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Also under 5.1E (page 65), we suggest the following edit: “This includes updating the ISBE Family Engagement Framework and its companion tools. The current universal framework is designed for LEAs and schools. It provides guidance on how to develop meaningful partnerships with families by developing family engagement systems, building welcoming and supportive environments, enhancing communication with parents, and including parents in decision-making. In using the framework, LEAs are using family engagement as a strategy for school improvement. Efforts occur on an ongoing basis and are embedded in school policies and practices. Additional tools and resources will be integrated into the framework for more targeted and intensive individualized engagement with families of students with disabilities, EL students, students with behavioral health issues, and/or students with trauma. Within the Family Engagement Framework, ISBE will explore how family engagement can occur beyond the walls of one school and instead be expanded to caregivers across different schools and LEAs so they can create partnerships and collaborations that aim to contribute to systems change and influence policies and practices on a broader scale. In addition, ISBE will include and invest in multi-generation approaches around workforce development and career pathways for caregivers. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Still under 5.1E (page 66), we applaud the comprehensive approach ISBE has taken to family engagement, particularly with respect to young children and families and English Learners. We appreciate ISBE’s partnership with the Illinois Early Learning Council on family engagement efforts focused on the early learning community. We suggest the following edit: “ISBE, which has received a Preschool Expansion Grant, will work across the agency and in communities to build stronger systems and local capacity of ECE providers and families to better coordinate supports

and increase confidence and opportunities for meaningful engagement. ESSA allows family engagement funds to be used for joint professional development inclusive of early childhood educators, which creates more consistency and alignment in how families are engaged before and after school entry and provides opportunities for early learning providers and schools to partner and learn from one another to best meet the unique needs of families in their communities. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Finally under 5.1E (page 64-67), in order to engage the parents of English Learners, the Illinois School Code calls for the formation of Bilingual Parent Advisory Councils. Early childhood is a critical time for English Learners beginning their academic journey. We urge ISBE to make clear that participation in Bilingual Parent Advisory Councils will be inclusive of preschool programs.

- Under 5.1F (page 67), we thank ISBE for ensuring that, within the standard process for the identification of ELs in Illinois, there is a *priority* to identify children with disabilities, who may or may not need additional services other than linguistic services. We suggest adding the following sentence: “It is critical that Illinois continue the practice of using qualified bilingual educational support personnel in identifying ELs with special needs.” This last paragraph avoids potential misidentification. EL students are entitled to both ESL/Bilingual and Special Education services if the child receives an IEP.

Further under 5.1F (page 67), we suggest inserting this language following the first (and only) paragraph in this section: “Education equity is unattainable for children with disabilities if the state and local school districts do not promote the early identification of developmental needs and the delivery of special education instruction and support for children who need them. Guidance will be issued on how to ensure that policies and practices supporting high quality inclusion are being established as outlined by the Individuals with Disabilities Education Act (IDEA).

“The IDEA presumes that the first placement option considered for an eligible child with a disability is the regular classroom the child would attend if he or she did not have a disability. Local education agencies must ensure that a free appropriate public education is provided in the least restrictive environment regardless of whether they operate a general early childhood program. This may include providing special education and related services in community based early childhood programs, including Head Start and Early Head Start programs, Preschool for All and Prevention Initiative programs and child care programs. ESSA offers promising opportunities to expand teacher and leader knowledge on how to best support the educational opportunities of young children with special needs in all settings, and will require guidance on cross sector professional development and embedded inclusion support. Further guidance will be issued on specific strategies for delivering special education instruction and related services to children in community-based programs, where often there are barriers to promoting inclusion (such as lack of comprehensive services, limited time and commitment to build partnerships, and the need to build funding models that support children in both school and community based settings).

“In addition, ISBE will develop a system for informing Local Education Agencies (LEA) of their responsibility to conduct Child Find activities and hold them accountable for implementing best

practices in this area. Child Find should be supported by adequate funding, offered monthly, and monitored by the school district. With increased marketing, event frequency, and better coordination with Early Intervention, school districts will identify young children birth to five who are eligible for services."

"According to Part 226 of the Illinois Administrative Code, special education personnel reimbursement is applicable to staff who are teaching students with disabilities. But if there is a single teacher in a classroom with a blend of students with disabilities and general education students, no FTE is claimable. The administrative code prohibits LEAs from using special education funds to support special education instruction in inclusive classrooms. This is a real barrier to effective implementation of the state's Preschool Expansion Grant, and to inclusion in general. This rule should be modified to facilitate improved braiding of funds to support inclusion."

- Under 5.1G (page 54), we suggest the following edit: "The 852 districts in Illinois must each submit a plan that was developed in consultation with stakeholders for approval. Many elements of the required ESSA District Plan were contained in the previous law, but some components are new, such as:
 - How the LEA will identify and address disparities in teacher distribution,
 - How the LEA will ensure that every child is taught by a highly effective teacher, ~~and~~
 - How the LEA will support efforts to reduce the overuse of discipline practices that remove students from the classroom, which may include identifying and supporting schools with high rates of discipline, disaggregated by each of the subgroups of students,
 - How the LEA will coordinate with early childhood programs, regardless if they use Title I funding for early childhood, and
 - How the LEA, if it uses Title I funds for early childhood education, will support, coordinate, and integrate ECE programs, including transition planning.

Also under 5.1G (page 67-68), we suggest adding the following sentence: "ISBE will incentivize LEAs to use Title I funding to expand ECE programming in schools that are underperforming." This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Continuing under 5.1G (page 67-68), we thank ISBE for incorporating a number of our suggestions, including 1) a commitment to support districts in providing programs and activities foster safe, healthy, supportive environments with adequate school resources (such as enough counselors, social workers, special education personnel) to address high level needs such as deep poverty, homelessness, community violence, and trauma, and drug free environments that support student academic achievement; 2) a commitment to use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs to reduce exclusionary discipline, implement evidence-based mental health awareness training programs, and expand access for school-based counseling and mental health programs; and 3) a commitment to include trauma-based responses within counseling programs as part of the 21st Century Community Learning Centers program.

Finally under 5.1G (page 67-68), following the best practices from the Consortium for Community Systems Development project, we recommend that ISBE consider using Title I funds

to provide dedicated support for local collaboration that links early childhood programs and elementary schools.

- Under 5.1H (page 68-69), we suggest the following edit: “ISBE will use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs and early childhood programs to reduce exclusionary discipline, implement evidence-based mental health awareness training programs, and expand access for school-based counseling and behavioral health programs. Programs can include school-based behavioral health services that are trauma-informed; prevent bullying and harassment; develop relationship-building skills; and train staff on trauma, classroom management, and child sexual abuse and prevention.

Also under 5.1H (page 68-69), we recommend ISBE consider encouraging LEAs to include evidence-based early education opportunities to address the achievement gap. To promote effective uses of funds to support ECE, ISBE should provide a list of evidence-based models that LEAs can fund through Title IV grant funding. These may include Community Schools, home visiting programs such as those supported through MIECHV funds, and the Chicago Parent/Child Centers model. The value of transitions should be emphasized as children move from early childhood programs into elementary school through application requirements for 21st Century Community Learning Center funds. Priority should be given to LEAs and partner organizations that can demonstrate an evidence-based approach to transition activities that are developmentally appropriate encourage data sharing and include joint professional learning opportunities. To ensure coordination, the applications for SSAEG should require LEAs to include data and other information from the local collaborative in developing the required needs assessment.

Section 5.2 Program-Specific Requirements

- Under 5.2A (page 71), we suggest the following edit: “Each SEA must describe the process and criteria it will use to waive the 40 percent schoolwide poverty threshold submitted by an LEA on behalf of a school, including how the SEA will ensure that the schoolwide program will best serve the needs of the lowest- achieving students in the school. ISBE will consider whether or not state- or federally-funded early childhood education is provided in the school when determining an LEA’s eligibility to waive the 40 percent schoolwide poverty threshold. Enabling a school to use Title I funds to continue to serve these children as they move into kindergarten and the later grades regardless of whether the school overall meets the 40 percent poverty threshold would provide the opportunity for the at-risk children who qualify for these programs to continue to receive comprehensive supports that sustain academic success.”

Also under 5.2A (page 71), we suggest the following edit: “ISBE will use 20 percent poverty as the initial threshold for schools to receive consideration for the schoolwide waiver. Further considerations will include the educational needs for schoolwide status, which may include the size of the school, the benefit the schoolwide status will provide, and other factors that the school wishes the state to consider. ISBE will also consider whether the school is located in a community with high rates of violence and student homelessness.”

- Under 5.2B (page 72), we suggest the following edit: “Illinois has a state identification and recruitment (ID&R) coordinator who oversees statewide activity to ensure that migrant recruiters

cover the areas of the state where migrant families reside and reach out to all eligible populations including preschool children and migratory youth who have dropped out of school. The state ID&R coordinator, in consultation with ISBE and local Illinois MEP operating agencies, develops, implements, and coordinates a plan to effectively identify and recruit all MEP-eligible children/youth residing in the state. The state ID&R coordinator works with a state recruiter as well as regional and local recruiters employed by local MEP projects to ensure that all MEP-eligible children and youth in the state are identified and recruited. ISBE will coordinate with Migrant Head Start and use the Migrant Student Information Exchange (MSIX) to ensure seamless transitions to K-12 for early childhood migrant students."

- Under 5.2C (page 81-82), we recommend the following edit: "As children enter programs supported by the Prevention Initiative, the intake process will note the language of the caregiver in order to plan appropriate services from the beginning".

Also under 5.2C (page 81-82), we recommend that beginning at age three, the Home Language Survey be used for all state-funded early learning programs. In addition, ISBE should consider replacing the current Home Language Survey with the [recommended language survey included in the U.S. DOE Tool Kit](#). (As students enroll in schools, the local school district administers a Home Language Survey (HLS) for all students new to the district during the registration process, for the purpose of identifying students of non-English background.)

Still under 5.2C (page 81-82), we suggest that data on student progress and achievement be disaggregated by the number of years a student has been in an EL program. Additionally, we recommend that ISBE consider ongoing tracking of ELs' academic achievement beyond point in time the student is considered English language proficient.

Finally under 5.2C (page 81-82), we suggest a few additional considerations for Title III:

- Adding that ISBE will support early dual-language programs as a pathway to promoting bilingualism and biliteracy, in consideration of the state's efforts to endorse the Seal of Biliteracy awarded to high school seniors.
 - Due to the current shortage of bilingual endorsed ECE teachers in Illinois, we recommend ISBE consider setting aside a portion of Title III funds to explore changes to ECE teacher preparation programs in consultation with the Illinois Advisory Council on Bilingual Education.
- Under 5.2E (page 83-104), we thank ISBE for incorporating our suggestions 1) to provide trainings on McKinney-Vento Homeless Education for child care, Head Start, and Early Intervention staff; 2) to collaborate with Early Intervention staff on identifying and providing services to homeless children and families; and 3) to provide training to Early Childhood program grant participants on McKinney-Vento Homeless Program with emphasis on identification, immediate enrollment procedures, rights to return to the "school of origin," transportation, and Student Information System data reporting through conference presentations and workshops.

Also under 5.2E (page 83-104), while we were thrilled to see a focus on referring children experiencing homelessness to Early Intervention, we urge ISBE to ensure that all infants and toddlers experiencing homelessness are identified and referred to *the full range* of early care and

education programs for which they are eligible, including child care, home visiting, and Early Head Start, among others.

Still under 5.2E (page 84-85), we suggest the following edit: “Create an annual work plan with measurable goals to give the Office of the Coordinator an opportunity to revisit and revise, as appropriate, policies and procedures. The process to create, implement, and/or assess the achievement of this annual work plan should involve stakeholders.”

Further under 5.2E (page 85), we thank ISBE for incorporating our suggestion to make data on the number of students identified as homeless publicly available on the ISBE website. We suggest that data be broken down by age/grade level/race/ethnicity, including children under the age of three. This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Still under 5.2E (page 87), we suggest inserting the following sentence somewhere within the School District LEA Homeless Liaison section on pages 87-88: “Ensure that ISBE early childhood policies, manuals, and training materials/efforts reflect the importance of recruiting, identifying, and enrolling homeless children in ISBE-funded early childhood programs.” This suggestion aligns with recommendations approved by the Illinois Early Learning Council.

Further under 5.2E (page 88), we suggest the following edit: “Homeless children and youths in Illinois will be identified by school personnel and through coordination of activities with other entities, such as homeless shelters and community service agencies. The Common Form (<http://www.isbe.net/homeless/pdf/83-01-common-form.pdf>) was created for LEAs to use when enrolling homeless children and youths. In addition to information on enrolling children and youths into school, it also asks for other children and youths residing in the home to be listed. That allows LEA homeless liaisons to reach out to families with preschool-aged children to assist with finding preschool placement for that child. It also allows LEAs to work with families who may need early intervention services for children ages birth to 3 years of age. Common Form will be updated to better reflect and support referrals to early care and education programs, particularly those programs that serve infants and toddlers, like Early Intervention and home visiting.”

Finally under 5.2E (page 91), we encourage ISBE to name the Part B 619 as a collaboration partner on developing Special Education policies and procedures. We also suggest adding more detail to the “5. Offers resources and support for pregnant and parenting youth” activity.

For more information about our comments, please contact me at 312-453-1931 or eregenstein@ounceofprevention.org. Once again, we appreciate this opportunity to comment and look forward to helping ISBE develop its current draft into a final approved plan.

Sincerely,



Elliot M. Regenstein

Senior Vice President, Policy and Advocacy, Ounce of Prevention Fund



College and Career Readiness Committee

December 22, 2016

Tony Smith, Ph.D.
State Superintendent of Education
100 North 1st Street
Springfield, Illinois 62777

Re: P-20 Council College & Career Readiness Committee Recommendations on Illinois ESSA Plan

Dear State Superintendent Smith:

On behalf of the College and Career Readiness (CCR) Committee of the Illinois P-20 Council, we as Co-Chairs appreciate the chance to make recommendations on the State's Every Student Succeeds Act (ESSA) plan.

The mission of the CCR Committee is to make actionable recommendations to the P-20 Council on what skills, systems, resources, and alignment efforts are required for all Illinois residents to be college and career ready in an innovative and globally competitive society. Within the P-20 Council structure, the CCR Committee focuses on incorporating the employer voice into the State's educational policies and programs. A core belief of the Committee is that college and career readiness cannot be reduced to a single metric, but must instead be understood as a multi-faceted set of knowledge, skills and abilities that allow students to successfully meet the challenges of college and career and live healthy, productive lives. In addition, the Committee believes that communication and collaboration across governmental, educational, and business entities must be leveraged to provide students with clear, consistent expectations, more navigable college and career preparation, and better targeted supports to meet individual student needs.

The CCR Committee is comprised of a broad range of stakeholders from across K-12, postsecondary education, employers, workforce development agencies, and state agencies, including representation from ISBE, ICCB, IBHE, DCEO, and the IWIB. The Committee has guided the P-20 Council on college and career readiness efforts, and has emphasized the need for employer engagement strategies such as the Learning Exchanges in key pathway sectors. The Committee also played an integral role in driving the multi-year effort to develop and pass HB 5729 (The Postsecondary and Workforce Readiness Act—the PWR Act).

The CCR Committee held two meetings to discuss the State's ESSA plan, each attended by over 40 people, including representation from practitioners, state agencies, employer associations, and advocacy and policy organizations. The primary focus in both meetings was to discuss the College and Career Readiness Framework put forth by ISBE, but the committee also discussed in-depth the School Quality Indicators and Multi-Tiered System of Support (MTSS) proposed in the plan.

Though we will not submit an alternative College and Career Readiness Framework, we will present in this letter the major concerns and areas for revision as discussed by the Committee, as well as recommendations for consideration in developing School Quality Indicators, the MTSS, and interim ESSA goals.

College and Career Readiness Framework (Section 3.1, p. 22 of 11/18/16 ESSA Draft Plan)

In its two meetings to discuss the State’s ESSA plan, the bulk of the Committee’s discussion focused on the two versions of the College and Career Readiness Framework proposed by ISBE. While overall, the CCR Committee applauds the move away from a single test score approach to determining college and career readiness, the group has concerns that the current framework put forth by ISBE does not sufficiently emphasize the “career” component, nor does it include adequate rigor to truly measure college readiness. Further, the Committee believes that higher education should be more deeply engaged in the creation and potential adoption of the framework. Absent significant engagement with the postsecondary community, the framework will have little impact on what actually happens when students arrive on a college campus. While care must be taken to not set an unduly high bar for Illinois students, any framework for College and Career Readiness must be validated by K-12, higher education, and employers as representing achievement at levels that signal preparation for postsecondary education and career training opportunities.

General Recommendations:

Labels: The framework’s labels should be revised to address two areas of potential confusion amongst practitioners and the broader public.

- The four categories should not be labeled “pathways”—this will cause confusion in the field, given the large amount of work across the state to develop and implement career pathway systems. Alternative labels discussed included:
 - Designations
 - Routes
 - On-Ramps
 - Options
- Replace “A, B, C, D” with “1, 2, 3, 4”—otherwise, a letter labeling runs the risk of the public perceiving these designations as a grading system.

Option A: Option A appears to use a minimum ACT or SAT score as a single measure of college and career readiness. The CCR Committee believes that this option should either be removed or somehow combined with the other indicators. There should not be any option that does not include career indicators, and Option A seems to simply re-institute our current approach to readiness that solely relies on assessment performance.

Ensure alignment to the Postsecondary and Workforce Readiness Act:

The Postsecondary and Workforce Readiness (PWR) Act resulted from multiple years of engagement with hundreds of stakeholders through a process led by the CCR Committee. The Committee believes that ISBE can strengthen the College & Career Readiness Framework by aligning to the PWR Act in the following ways:

- Encourage the use of the Postsecondary and Career Expectations (PaCE) framework to support schools to address the indicators as part of a broader system for college and career readiness, and explore opportunities to integrate PaCE with the College & Career Readiness Framework.
- Enable a College and Career Pathway Endorsement under the PWR Act to serve as a readiness option. Endorsements require the demonstration of both academic and career readiness in ways aligned to the proposed framework, including a demonstration of readiness for non-remedial coursework in both Reading and Math.
- Change “College Developmental/Remedial English and/or Math Course” reference to “Transitional Math or English Course”, as the term “transitional course” is used in the PWR Act and the research literature to refer to courses comparable to college remedial courses that are offered at the high school level.

Readiness Indicators:

Attendance:

While the Committee agrees that attendance is a critical “readiness” behavior, it does not believe that it should be one of several career indicators and instead should be elevated as an overall readiness indicator. After all, attendance is just as critical of an indicator for academic success in postsecondary education as it is for career success. Therefore, the Committee recommends that 90% Attendance be a baseline measure to demonstrate college and career readiness, regardless of the additional academic and career indicators. ISBE should collaborate with stakeholders to explore the impact of including excused absences (primarily medically-related) on this indicator.

Career Indicators:

While the Committee strongly supports the inclusion of career indicators in the framework, it believes that the current approach does not sufficiently emphasize a student’s readiness to pursue a career path after high school. The Committee discussed the example of a student being identified under the current framework as “Career Ready” based upon 90% attendance and participation in two co-curricular activities, without having had any other exposure to career options after high school. Moving attendance out of the career indicator list, as suggested above, will help address this concern. In addition, the Committee recommends the following:

- To be career ready, require that all students identify and explore an area of career interest, including the knowledge needed and postsecondary options to pursue that interest. This process of career interest exploration and identification will support students to make better decisions upon their transition from high school, even if they ultimately choose to pursue a different interest area. This need not be accomplished in a new course at the local level, but can be integrated into existing high school requirements such as consumer education.
- Terms included in any career readiness indicator should be made explicitly clear and appropriate to the setting:
 - Workplace Learning Experiences: There is no baseline definition for this that is consistent across the state; although it is a challenging definition to set, it will not be a viable metric until the State can be certain students are having comparable experiences. The definition established for the framework should be consistent with the work-based

learning definition created by the State under the Workforce Innovation and Opportunity Act (WIOA). Further, the State should consider inclusion of other work experience of students that are not offered through their school (e.g., summer or after-school jobs) with a recommendation from a supervisor.

- Industry Credentials: Industry credentials need to be valued by employers within a sector, demonstrated through labor market data to enhance career opportunities, and “stackable” as part of a career pathway system. The State needs to specify credentials that meet these criteria.
 - Military Service: The more appropriate participation metric for military service is participation in JROTC, and not ROTC. The Committee cautions the use of ROTC commitments, as it represents a measure of a post-secondary activity and thus is not necessarily representative of preparedness for college and career.
- In addition to industry credentials, the State should consider an indicator for CTE concentration, as CTE Programs of Study include vital work readiness training and CTE concentration has been demonstrated to result in improved secondary and postsecondary outcomes.

Academic Indicators:

While the CCR Committee applauds the framework’s use of multiple academic measures, it has concerns around the rigor of the current academic benchmarks and indicators, as well as the process to establish them. A core process recommendation coming from the CCR Committee is for ISBE to ensure the College and Career Readiness Framework is not finalized until there has been adequate time and opportunity for postsecondary partners to truly engage with and validate the framework (in particular, the GPA and assessment benchmarks, and the academic indicators). Otherwise, students and families may receive a designation of “College and Career Ready” through the ISBE framework, only to transition from high school into remedial postsecondary education courses because of differing, more rigorous expectations at the higher education level.

The CCR Committee believes that a series of questions need further investigation and discussion before finalizing the framework including, but not limited to:

- Is the intent of the College Readiness designation to ensure that students can enter college and avoid developmental or remedial work in both math and English?
- What is the appropriate minimum ACT and SAT score for College Readiness (in particular, with no additional readiness information)? Should these scores align with the most common expectations for avoiding remedial education in our community college and public university system?¹ How does the recent redesign of the SAT impact the score-setting process?
- What is the intended linkage for each outcome level in the framework to preparation in Math and English?²
- How and by whom will Algebra II proficiency be defined?

¹ The committee also recommends further alignment between the CCR definition and the expected requirements for math competencies in transitional math courses under the Postsecondary and Workforce Readiness Act

² Illinois' current high school graduation requirements do not require Algebra II—therefore coursework and GPA indicators do not provide assurance that the student has taken math required to enter college credit-bearing coursework. In addition, while the English requirements require 4 years of English the definition of this course work is not aligned with the Illinois Learning Standards.

- The framework includes “Pass College Placement Exam” as an indicator; what exam is being referenced and how and by whom will “pass” be determined?
- Should there be limits on the subjects for which the academic indicators are applicable?³
- Should acceptable grades for coursework requirements be limited to A or B? How can we establish more certainty about grading expectations? Are GPA and rigorous coursework expectations appropriately linked within the framework?
- What is the distinguished scholar designation intended to signify, and how should it be viewed by postsecondary institutions? What is the appropriate SAT and ACT score for a distinguished scholar designation? Should it align with the expectations of our 4-year public university system in Illinois?

The higher education representatives of the committee look forward to discussing these questions and other alignment questions further with K-12 stakeholders and ISBE. The CCR Committee recommends the creation of a working group with higher education representatives, K-12 stakeholders, employer representatives, additional members of the CCR Committee, and State Agencies (in particular, ISBE, ICCB, and IBHE) to meet in early 2017 to consider these questions and the approach to college readiness and the academic indicators for ISBE’s consideration.

In addition to these concerns over the rigor and process for adopting the current framework, the Committee discussed the following as potential additional academic indicators:

- Original research or collaborative research with industry, or international research or experiences
- Honors coursework
- Student publications

These suggestions could be incorporated into the scope of the working group’s review.

School Quality Indicators (*Section 3.1, pp. 19-20 of 11/18/16 ESSA Draft Plan*)

As the State develops School Quality indicators for its ESSA plan, the CCR Committee has the following recommendations:

- The Committee supports using science achievement on current science assessments as a measure of school quality, given the importance of science teaching and learning to career opportunities in the STEM-related fields.
- The Committee feels strongly that an indicator or set of indicators that capture secondary-to-postsecondary transitions and success are critical in order to understand and validate whether high school graduates are truly prepared for success in college-level coursework. Although the Committee discussed metrics including remediation rates and postsecondary enrollment, the general agreement was that great care must be taken in order to ensure that these are quality measures that adequately reflect school quality as opposed to demographics.
- The Committee believes that a multi-faceted measure to capture College and Career Readiness is critical, although the current Framework as presented by ISBE should be adjusted consistent with the above recommendations.

³ For example, do Advanced Placement courses in arts and foreign languages count toward AP course indicator? This could be addressed by for each academic indicator or in the context of different options.

Multi-Tiered System of Support (Section 3.3, pp. 45-50 of 11/18/16 ESSA Draft Plan)

As the State develops its plan for a Multi-Tiered System of Support (MTSS) as part of its ESSA State Plan, the CCR Committee recommends that:

- The MTSS must be accessible and easy to understand for school districts identified to be in need of support.
- The State should seek to maximize peer-to-peer learning amongst districts as a means of leveraging expertise that exists throughout the state.
- The State should ensure that supports and interventions are driven by disaggregated data analyzing the performance of subgroups and gender disparities.
- The MTSS should span P-12 and postsecondary and career transitions, and must be aligned with an approach to college and career readiness that acknowledges the need to intentionally align secondary education to postsecondary education options, employer needs, and regionalized career opportunities.

A primary concern that arose in the Committee’s discussion was the issue of accessibility of opportunities. Serious equity concerns arise when districts lack the resources to provide opportunities to meet academic or career indicators in the State’s ESSA plan, and this lack of resources should feed back into the MTSS and trigger supports for that district or school in order to ensure all Illinois students have an opportunity to meet readiness standards.

Interim Goals/Measurement (Section 3.1, p. 37 of 11/18/16 ESSA Draft Plan)

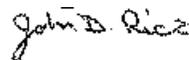
The CCR Committee strongly agrees with ISBE establishing interim goals across the ESSA plan, and particularly within the implementation of the College and Career Readiness Framework. In order to ensure a connection between the designation of readiness and actual postsecondary success, there is a need to review interim progress on the indicators together with other data on postsecondary and career transitions such as postsecondary enrollment, remediation, attainment of industry credentials, expansion of apprenticeships, etc.

In closing, the College and Career Readiness Co-Chairs and Committee stand ready to work with ISBE to both finalize the aforementioned elements of the ESSA plan, as well as support its faithful implementation throughout the state. We appreciate your consideration of our recommendations and we would be happy to discuss them with you or other ISBE representatives.

Sincerely,



Elizabeth F. Swanson
Vice President, Strategy and Programs
The Joyce Foundation



John D. Rico, CEO
Rico Enterprises & Co-chair of the
Illinois Workforce Innovation Board

E. Parent, family, and community engagement;

ISBE believes that parent, family, and community engagement is a cornerstone of effective schools and a critical element for a child's education and well-being. ISBE has an intra-agency collaborative team charged with working across divisions to develop more cohesiveness and efficiency in the effort to build capacity, cognition, confidence, and connections for the work. The team has developed a shared definition for family engagement: Meaningful family engagement is based on the premise that parents, educators, and community members share responsibility for the academic, physical, social, emotional, and behavioral development of youth. This helps to frame the supports developed for ISBE, LEAs, and other key stakeholders. Family engagement is fostered through a deliberate process that is embraced throughout the school. It empowers adults to jointly support student growth, addresses any barriers to learning, and ensures college and career readiness. Foremost, effective family engagement systems, policies, and practices are mindful of diverse school-communities that are rich in language, culture, and school experiences. They are responsive to student and family needs.

To that end, the agency continues to build internal capacity and a number of supports for LEAs, schools and communities. Family and community engagement is one of the core elements for the Illinois Balanced Accountability Measures. This includes updating the ISBE Family Engagement Framework and its companion tools. The current universal framework is designed for LEAs and schools which includes but is not limited to charter, alternative and community schools. It provides guidance on how to develop meaningful partnerships with families by developing family engagement systems, building welcoming and supportive environments, enhancing communication with parents, and including parents in decision-making. In using the framework, LEAs are using family engagement as a strategy for school improvement. Efforts to engage families in meaningful ways that are linked to learning and healthy development outcomes for students occur on an ongoing basis and are embedded in school policies and practices. Additional tools and resources will be integrated into the framework for more targeted and intensive individualized engagement with families of students with disabilities, EL students, students with behavioral health issues, and/or students with trauma.

~~This includes updating the ISBE Family Engagement Framework and its companion tools. The current universal framework is designed for LEAs and schools. It provides guidance on how to develop meaningful partnerships with families by developing family engagement systems, building welcoming and supportive environments, enhancing communication with parents, and including parents in decision-making. In using the framework, LEAs are using family engagement as a strategy for school improvement. Efforts occur on an ongoing basis and are embedded in school policies and practices. Additional tools and resources will be integrated into the framework for more targeted and intensive individualized engagement with families of students with disabilities, EL students, students with behavioral health issues, and/or students with trauma.~~

ISBE will also continue to update and develop family engagement professional development workshops and multi-tiered supports that are available statewide to schools and districts through Foundational Services. The workshops and networking opportunities are aligned to the ISBE Family Engagement Framework. They are designed to help schools and districts partner with families so that they are more readily able to meet student achievement and healthy development goals, leverage resources, build effective relationships between parents and teachers, develop ongoing community support for school

and district improvement, and meet federal and state requirements for family engagement. Family and community engagement is one of the core elements for the Illinois Balanced Accountability Measures. The updated tools, professional learning opportunities and resources will provide greater opportunities for meeting the accountability measures.

ISBE's English Language Learners Division published a guidance framework for schools and districts that integrated the four core principles of the ISBE Family Engagement Framework. The guidance document will be used to provide technical assistance. The division will also partner with external stakeholders, including WIDA and the Illinois Resource Center, to build capacity to engage EL families. There are a series of bilingual online trainings that are available to families to assist them in navigating the school system. ISBE will engage families, community members, schools, and districts through the Bilingual Statewide Advisory Council to ensure that the needs of EL families and communities in the education of bilingual students are met.

ISBE is pleased that there remains a set-aside requirement for parent and family engagement, with an allocation of more than \$500,000 in Title I. Ninety percent of those set-aside funds must be distributed to the schools, with a priority for high-need schools. Principal consultants will verify compliance with specific statutes regarding allowable use of funds during their review of the Title I grant. This information will be shared through a webinar. ISBE principal consultants in consultation with educators and community resources will continue to provide technical assistance and professional development supports to ensure Title I funding, that is dedicated for family engagement, works to strengthen school improvement efforts, ensure that there is ongoing communication and builds capacity for families in ways that are linked to learning and healthy development outcomes for students.

The Title Grants Administration Toolkit provides dates and sample letters districts can use to ensure they meet Parents Right-to-Know requirements. ISBE will ensure that at the beginning of each school year districts are aware of their obligation to notify Title I parents that a parent has the right to request information regarding the professional qualifications of the student's classroom teachers. In addition, a Title I school must also provide timely notice to a parent of a child who has been assigned or has been taught for four or more consecutive weeks by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned.

Also, Title IV, Part B funds will be used to build capacity of subgrantees as they implement high-quality after-school programs for students and families. ISBE recognizes that after-school programming oftentimes is the first entry point for family and community engagement in the school building. The professional development and technical assistance plan for 21st Century Community Learning Center grantees includes an annual comprehensive menu of supports for family and community engagement that includes webinars, regional workshops, newsletters, resource bulletins, a website, and two biannual conferences.

In addition, ISBE works closely with an Illinois after-school statewide network, the ACT Now Coalition, which recently published quality standards for Illinois after-school program providers. Almost 50 percent of the providers are LEAs and schools. This is significant, given that this leverages the ability ~~for~~ better coordinate resources, staff, and funding ~~that~~ to strengthen engagement efforts. There are dedicated standards for family and community engagement as well as for school partnerships. ISBE will work with the network in providing professional development and a community of practice to strengthen local connection and capacity for meaningful engagement that is linked to learning and healthy development outcomes for students.

~~So, too, ISBE's English Language Learners Division published a guidance framework for schools and districts that integrated the four core principles of the ISBE Family Engagement Framework. The guidance document will be used to provide technical assistance. The division will also partner with external stakeholders, including WIDA and the Illinois Resource Center, to build capacity to engage EL families. There are a series of bilingual online trainings that are available to families to assist them in navigating the school system. ISBE will engage families, community members, schools, and districts through the Bilingual Statewide Advisory Council to ensure that the needs of EL families and communities in the education of bilingual students are met.~~

There are number of strategies that ISBE will be developing to continue and strengthen for young children and their families. Early Care and Education (ECE) providers can receive recognition of their work in family and community engagement from Early Childhood's Continuous Improvement Quality Rating System. This recognition boosts their quality rating and informs families of their quality practice. This gives families more opportunities to make informed decisions about their child's learning environment and the kinds of support they may receive as their child's first teacher.

ISBE, which has received a Preschool Expansion Grant, will work across the agency and in communities to build stronger systems and local capacity of ECE providers and families to better coordinate supports and increase confidence and opportunities for meaningful engagement.

ISBE is a key stakeholder on the Illinois Early Learning Council that, as a public-private partnership created by Public Act 93-380, strengthens, coordinates, and expands programs and services for children, birth to 5, throughout Illinois. There is a dedicated committee for family and community engagement that is working in partnership with ISBE to implement a strategic plan to support hard-to-reach families, help families achieve self-sufficiency goals, and support schools in better coordinating the transition for families when their children transition into elementary school.

ISBE is also developing a framework for families in partnership with families, community resources and faith-based partners because the agency recognizes that families are an integral part of a child's success from cradle to career. This work will align supports for children and families in efficient ways where community resources are strategically organized to support student success and where there is a focus on the whole child, integrating academics, services, supports and opportunities. ISBE acknowledges the impact community resources and faith-based partners have in helping families become partners and leaders in supporting schools as well as their child's learning and healthy development. ISBE acknowledges the impact of the community school model as it embeds family engagement as a core pillar for school and student success. Community school s strengthen opportunities for school and partners from across the community to come together to educate and support student and families in building thriving communities. –

Finally, family and community engagement is one of the central foci of the work of the Health and Human Services Transformation agenda and an integral part of the overall effort to build internal capacity and coordination for services targeting impacts for children and families statewide. ISBE in partnership with the governor's office will be looking to build stronger pathways for communication with families, community resources and faith-based partners to optimize the efficacy of the work. ~~Family and community engagement is one of the core elements for the Illinois Balanced Accountability Measures.~~

F. The accurate identification of English Learners and children with disabilities;

Illinois wants to ensure that, within the standard process for the identification of ELs in our state, there is a priority to identify children with disabilities, who may require dual services to meet their language-related and disability-related needs including accommodations for meeting 504 plans. Every evaluation of a child identified as an English Learner will include assessments both in English and in the native language of the student that is consistent with the Illinois Administrative Code. Assessments will determine if the child's lack of English language proficiency is or is not the cause of the learning difficulty. Training may be needed for related service personal, as well as general education staff, on distinguishing language acquisition characteristics exhibited by ELs from disability-related behaviors characteristics demonstrated in the classroom setting. Every Individualized Education Program team will include a qualified bilingual specialist/dual language teacher able to address the child's language or cultural factors as they relate to English Learners' needs AND an interpreter, for parents who are limited English proficient, who is competent and knowledgeable in both languages and key specialized terms and concepts.



Illinois State Board of Education
100 W. Randolph, Suite 14-300
Chicago, IL 60601

December 23, 2016

Dear Reverend James Meeks, Board Chair, and Dr. Tony Smith, Superintendent:

We, parents and grandparents of Illinois school children, know that our schools succeed when parents – who are indeed our children’s ‘first teachers’ – partner actively with educators to support our children’s learning. We therefore write you to encourage Illinois to implement ESSA in specific ways that will strengthen the partnership between parents and schools. We write as members of POWER-PAC (Parents Organized to Win, Educate and Renew – Policy Action Council), a cross-community membership organization of parent leaders from low-income communities of color across Chicago and Illinois, staff supported by COFI, Community Organizing and Family Issues.

In particular, we urge the State of Illinois to ‘use’ ESSA to break new pathways in ‘family engagement’ by engaging parents *as leaders and full partners* in making our educational system work for *all* families. As leaders on Local School Councils, bilingual advisory councils, Head Start councils, early learning collaborations, and at various policymaking tables, we know that parents can and do play a critical role as change agents in making schools and systems work better for families. When parents are decision-makers in systems, children and family outcomes improve.

We urge the district to use section 5.1 E of ESSA – Parent, Family and Community Engagement to take the following actions:

Create a statewide parent advisory council to serve as a vehicle to hear parent voice and opinion across systems, including the early learning and K-12 Education system so that policies that affect families and children are not being created without meaningful input from parents and families.

Use ESSA funds to support professional development on the continuum of quality parent engagement, including parent leadership, parents shaping programs and services, and influencing policies and systems.

Invest ESSA funding and other resources in parent engagement and leadership. Partner with community groups to provide authentic parent engagement and leadership trainings, using ESSA funds to support this critical work. Create spaces where parents can come together to have input on systems and policies at the local school, district and state level and encourage peer-to-peer (parent-to-parent) learning and outreach models.

In Paragraph 3 of the Parent, Family and Community Engagement section (found on page 65 of the draft), the first sentence (which begins “ISBE will also continue”), include the language, “In collaboration with parent leaders, families and community resources”. (This is language that we helped to develop along with the P-20 Council’s Family Engagement Subcommittee.)

In addition to the area of family and community engagement, we urge the state to take the following actions:

3.1 Accountability

Choose a “School Climate and Safety Indicator” and the state should measure that by a reduction in suspensions, expulsions, arrests and tickets given by police. Include positive school climates as a support and improvement strategy, and when a school is identified for support and improvement, have the district work with the community to conduct a needs assessment and develop an improvement plan.

4.2 A Resources to Support State-Level Strategies

Encourage districts to partner with and provide resources to support local and regional early learning collaborations, like those of the AOK Network, and the Maternal, Infant and Early Childhood Home Visiting (MIECHV) program.

5.1 A - Transitions

Build a seamless system of early learning programs and education, with smoother transitions from birth to three programs to preschool and Head Start programs to and K-12 programs. The creation of the transition practices and process should include input from parents on what supports would be helpful during the transition.

5.1 C – Student Conditions for Learning

Stop all suspensions and expulsions of preschoolers. There should be culturally relevant and developmentally appropriate positive behavioral intervention resources for programs.

5.1 C – Student Conditions for Learning

Make local schools and districts become places where families are connected with resources, such as SNAP, TANF and All Kids. Chicago Public Schools should reinstate the Children and Family Benefits Department.

We appreciate the opportunity to provide input into the state implementation plan and believe that if done well, ESSA can advance equity and improve outcomes for all children in our state. We have shared with you a number of recommendations that we think, as parents and people who are invested in all seeing Illinois children do well, will help do this. Please feel free to reach out to us should you have any questions or if you would like to discuss these recommendations further.

Sincerely,

Charlene Campbell
POWER-PAC Elementary Justice Co-Chair

Gloria Harris
POWER-PAC Vice-Chair and Early Learning Co-Chair

Maria Christina Martinez
POWER-PAC Early Learning Co-Chair

Felipa Mena
POWER-PAC Co-Chair and Elementary Justice Co-Chair

Ellen Schumer
Executive Director, COFI



January 6, 2017

Tony Smith
State Superintendent of Education
Illinois State Board of Education
100 West Randolph, Suite 4-800
Chicago, IL 60601-3223

Dear Superintendent Smith:

University of Illinois
President Timothy L. Killeen

Chicago State University
Interim President Cecil B. Lucy

Eastern Illinois University
President David M. Glassman

Governors State University
President Elaine P. Maimon

Illinois State University
President Larry H. Dietz

Northeastern Illinois University
Interim President
Richard J. Helldobler

Northern Illinois University
President Doug Baker

Southern Illinois University
President Randy J. Dunn

Western Illinois University
President Jack Thomas

We write to provide brief feedback on the College and Career Readiness Framework proposed in the second draft of the Every Student Succeeds Act (ESSA) State Plan. In particular, the comments that follow pertain to the College Readiness indicators that are proposed.

In general, we support consistent, robust standards for high school preparation, which as we understand is the purpose of establishing the College and Career Ready Framework. However, if the proposed CCR benchmarks/framework are to be applicable to the higher education community in Illinois, they must be treated as guidelines for, not as guarantees of, college admissions. For example, the Framework should be clear that:

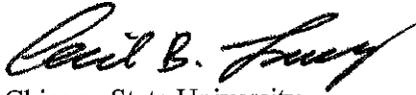
- the criteria indicate only a *minimum level* of college readiness
- students meeting the thresholds may meet minimum eligibility, but might not be competitive enough to be admissible
- the Framework's readiness indicators pertain to non-selective institutions only
- the indicators relate to general admissions, not admissions to a specific discipline or program
- students meeting the thresholds would be exempted from remedial coursework generally, but not necessarily under every circumstances whatsoever

Illinois' public universities welcome the opportunity to work on the questions of College Readiness in collaboration with the P-12 system in Illinois, before the final draft plan is proposed. Such collaboration will help to ensure that all education providers along the P-20 education spectrum are in agreement about the definition of the term "College Ready" and the indicators that are proposed to demonstrate that readiness.

We look forward to hearing from ISBE about the next steps in this process of providing collaborative input early in 2017.



University of Illinois
President Timothy L. Killeen



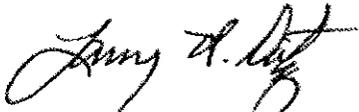
Chicago State University
Interim President Cecil B. Lucy



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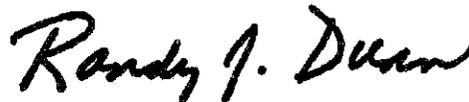
Illinois State University
President Larry H. Dietz



Northeastern Illinois University
Interim President Richard J. Helldobler



Northern Illinois University
President Doug Baker



Southern Illinois University
President Randy J. Dunn



Western Illinois University
President Jack Thomas

cc Tom Cross
Beth Purvis
Jim Applegate

December 27, 2016

To: Dr. Tony Smith
Illinois State Superintendent of Education

From: South Cooperative Organization for Public Education (SCOPE)
Peg Agnos, Legislative Director

Re: ESSA – State Plan Draft 2
Comments, Observations and Concerns

Over the past several weeks, members of SCOPE have attended the ESSA listening sessions and the November 18 meeting of the State Board of Education. As you continue to develop the ESSA State Plan we would like to offer our comments, observations and concerns for your consideration.

College and Career Ready Pathways (Plan 2, presented to the ISBE on November 18 is the focus of our remarks)

SCOPE believes that each and every student is unique. They come with different strengths and skills and therefore they should be able to demonstrate college and career readiness in different ways. We support the opportunity for students to choose from the four proposed pathways.

1. *Benchmarks*

- o The Distinguished Scholar Designation is laudable.
- o In Pathway A, B and C there is a reference to a minimum GPA or ACT or SAT score.

Our recommendation is to also include a benchmark for high achievers, students who may or may not achieve a minimum score, however need encouragement to seek a pathway to success.

2. *Special needs students*

- o As we review the current pathways and designations we are asking for more guidance on pathways for our severe and profound students who have more significant needs.
- Is the Individualized Education Plan (IEP) for these students an appropriate benchmark?

3. *Career Indicators*

- What are the parameters for two or more organized co-curricular activities?
- Does the student have the opportunity to choose a specific career path?

4. *Classification*

- We recommend that the pathways be labeled in a way that does not use letters, numbers or shades of the same color.
- Change the name to College and Careers Readiness Pathways

Growth Models

The models of student academic growth that are in the draft plan are difficult to understand. Administrators indicate concern that it will be difficult to determine progress; and express concern that we may be regressing to AYP?

We believe that there are multiple ways to achieve a single purpose. Therefore, we support the state's desire to provide flexibility and local control so that districts can demonstrate their growth in the way that most accurately portrays work being done on behalf of their students.

ACADEMIC INDICATORS

The academic indicator for K-8 is PARC and the State is in the final contract year with the PARCC.

- Does this require an RFP? When will ISBE begin the RFP process?
- Now that the SAT is the academic indicator for the high school, many school districts use assessment tools that may not be compatible to SAT.
- There is agreement that mastery of reading at the 3rd grade level is one of the strongest indicators of high school readiness.

With the release of the Title 1 final regulations that includes a mandated state template, we know the work of the agency has become more intense. We appreciate the direction that Dr. Smith and the Board of Education continues to follow, engaging with us and moving forward to bring even

more to each and every student in Illinois.

Contact:
Peg Agnos
Legislative Director
Scope
Cell: 630.632.2954

My name is Shawn Healy, and I serve as the civic learning scholar at the Robert R. McCormick Foundation in Chicago. The Foundation convenes the Illinois Civic Mission Coalition (ICMC), and I am its chair. I also had the privilege of chairing the Illinois Task Force on Civic Education in 2014, and the ICMC is committed to seeing its policy recommendations implemented.

As stated in my October 5, 2016, comments at an ISBE ESSA listening session held at the DeKalb County Farm Bureau, the ICMC is supporting teachers, schools, and districts throughout Illinois with implementation of the new high school civics course requirement, the top recommendation of the Task Force. In the past year, our team has provided more than 170 hours of professional development to nearly 1,400 teachers statewide. Moreover, we have ambitious plans for further support in the second and third years of our commitment to provide more than \$1 million annually for teacher professional development and classroom resources.

However, the second policy recommendation and success of the Task Force, revised state social studies standards, lacks similar support mechanisms for implementation. They take effect coincident with the 2017-2018 school year, and our collective sense is that teachers, schools, and districts are ill-equipped to fully operationalize them this coming fall and beyond.

Based on our experience in the field, many teachers are not even aware that new standards are in the pipeline. Moreover, the paradigm shift they represent from didactic teacher-led instruction to student-directed inquiry necessitates a great deal of external support in the form of training and standards-aligned resources.

We salute ISBE for its early foray into standards implementation, but suggest that the acute needs are mismatched with these minimal resources. Given our work on civics course implementation, we have addressed the grades 9-12 civics standards extensively, and are poised to drill down to K-8 in 2017.

However, the other social studies disciplines, namely history, geography, and economics, demand similar support. There are a number of Illinois-based organizations in these subjects that helped write the new standards, not to mention the teachers themselves that served on the standards task force, which can be operationalized to support implementation. This will require coordination with, and resources from ISBE, and the ICMC standards eager to advance this partnership.

Looking specifically at ISBE's second draft of the ESSA plan, it's fair to say that it provides little more than lip service to the social studies and civics in particular. However, our collective work aligns well with the central thrusts of the plan.

- Section 2 addresses state academic standards, and we have emerging K-12 social science standards due for implementation coincident with the 2017-2018 school year. While the social sciences lack accountability mechanisms like the other core subject areas, our teachers, schools, and districts need tremendous support in facilitating the paradigm shift

our standards represent for the field. Based on my aforementioned comments, we would like to see the social sciences included among the other core subjects as recipients of state support for implementation.

- Section 3 speaks to school accountability, support, and improvement. Not only is our Democracy Schools Initiative tied to the Illinois 5Essentials referenced in the report and widely employed by schools throughout the state, but we also offer extensive support mechanisms for schools seeking to strengthen commitments to students' civic development in the form of funding and membership in the Democracy Schools Network. We encourage ISBE to consider students' civic development, and the Democracy Schools designation in particular, as a key element of school accountability, support, and improvement.
- Section 4 focuses on supporting educators, long the center of our Democracy Schools work, and key to our efforts to support implementation of the new high school civics course requirement and related 9-12 social studies standards. Our model of peer-to-peer learning through teacher mentoring and ongoing, face-to-face professional development opportunities employs best practices and would benefit from partnership with ISBE and further integration into the ESSA State Plan.
- Finally, Section 5 centers on students, and it's important to say that their civic development is every bit as critical as college and career readiness. The ESSA draft plan should be credited for emphasizing students' social and emotional development, but must also embrace their education for democracy at a time and in a place where it's needed more than ever.

The state's civic learning community pursues this work at a time of disconcerting uncertainty. Federal education policies are very much up in the air, and the "Springfield Stalemate" has only added fuel to a challenging environment. The bitter 2016 Election and its still-evolving aftermath further underline the importance of our collective efforts to educate our students for democracy. We implore ISBE to embed students' civic development within its final ESSA implementation plan and stand eager to partner with the agency in ensuring that all Illinois students graduate prepared for college, career, *and* civic life.

December 27, 2016

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777
essa@isbe.net

RE: Providing additional feedback to help guide development of ESSA State Plan Draft #3

To the Illinois State Board of Education:

The Sargent Shriver National Center on Poverty Law works to advance laws and policies that secure justice to improve the lives and opportunities of people living in poverty. Within the Shriver Center, the Early Childhood Justice Project focuses on addressing poverty and racial inequality by expanding access to effective early childhood programs, from birth.

We note with appreciation the sections of the second draft of the State Plan which use the new opportunities presented in ESSA to promote a more comprehensive, evidence-based system of early childhood education in the state, from birth. Illinois is a national leader, through the Early Childhood Block Grant and the recent expansion of the Infant-Toddler Set-Aside (Public Act 99-589), in creating a growing patchwork of programs that provide crucial developmental education and care for children from birth to age three. Yet as the Illinois Early Childhood Asset Map shows, there remain many communities in Illinois where low income children do not have access to Prevention Initiative, Early Head Start, other home visiting programs, or high quality child care. ESSA directs states' attention to the promise of early childhood education, and provides funding to support many of the pieces needed to build an integrated, strong early learning system in Illinois.

Local Education Agencies (LEAs), sitting at the hub of community life in every corner of the state, are ideally positioned to assess the local availability and quality of early childhood services, to bring together stakeholders for collaborative efforts to improve children's school readiness and smooth transitions to kindergarten, and also to align professional learning for teachers and administrators from birth through early elementary grades. ISBE should strongly encourage all 852 LEAs to use ESSA funds to strengthen local birth to three programs-- and provide guidance and assistance for LEAs to do so.

Our comments here on sections of the plan point out ways to further strengthen the connection between schools and communities, to guide training for administrators and teachers to combat implicit bias and racism, and to invest state and federal resources starting where learning starts—at birth.

Section 1.1 Timely and Meaningful Consultation

Thank you for your continuing efforts to solicit stakeholder comments and engagement, and for the changes in the second draft that reflect careful efforts to listen and reconcile differences.

Section 3.1 Accountability.

Seven statewide long-term goals are articulated (p. 31). Whether the long-term goals are pegged to student growth or to proficiency, success in meeting any of the goals is heavily dependent upon closing the opportunity gap that appears as young as nine months of age. By starting early supports for families from birth, providing home visiting, quality child care, and early intervention, followed by high quality preschool with early childhood special education supports as needed for all 3 and 4 year olds, children will have a much higher chance of academic success by third grade, and the state will likewise have a much higher chance of success in meeting its long-term goals..

The first goal, that all kindergartners are assessed for readiness, sets the bar too low. Simply assessing kindergartners for school readiness is an important step, but assessment alone will not lay the necessary foundation for the rest of the goals in successive grades. By the time a child enters kindergarten, he or she may already be so far behind peers that attaining proficiency by third grade will be very difficult. The goal should be that 90% of kindergartners are assessed **and found ready** for kindergarten. Local school districts may be held accountable for kindergarten readiness because, with state support, they will have the capacity to help establish and support community collaborative efforts to boost children's learning experiences in the first five years of life. For example, local districts could provide data for school readiness campaigns and share expertise in parent engagement and systems building. Local districts can and should track the early childhood experiences of incoming kindergartners, identify gaps in early education available in the community, and assess families' other unmet needs that impact their children's learning. In addition, local districts can coordinate intake and referrals for publicly funded early childhood programs, including Prevention Initiative and Preschool for All. Together with community partners, LEAs can identify and help obtain resources the community needs to get all children ready for kindergarten. By working with community collaborations, forming close ties with parents, gaining knowledge of their strengths, and using culturally and linguistically responsive practices, local schools have the potential to appropriately and sensitively support early learning from birth for all their future students.

Research shows, and ISBE has recognized, that programs supporting development during the early years of life positively impact a child's learning trajectory, and can avoid lifelong problems in learning, behavior, and physical and mental health. (Draft Plan #2, p. 58, 98.) In order for the SEA and LEAs to reach the long-term goals in Section 3.1 (p. 37), the state should strongly encourage LEAs to take full advantage of the allowable investment of ESSA funds in early childhood. The clear language describing and explaining the value of early childhood programs in the description of supports for homeless children (p. 98 of Draft #2) would be appropriate to use in Section 3.1 as well. An additional resource for LEAs that could be added in this section is the Head Start Early Learning Outcomes Framework Ages Birth to Five, <https://eclkc.ohs.acf.hhs.gov/hslc/hs/sr/approach/pdf/ohs-framework.pdf>.

Reporting system indicators should include early childhood services available in the district's community, including preschool enrollment. Data system alignment with other child-serving systems, including Part C Early Intervention, Head Start, child care, and health, would make possible a more coordinated and accurate picture of early childhood needs at the state and the local district level.

Section 3.2 Identification of Schools

We appreciate the expressed desire for districts and schools “to address the holistic needs of students through evidence based, developmentally appropriate, and culturally and linguistically competent practices that have been demonstrated to improve outcomes for all students” (p. 30). To identify the districts that most need school improvement funds, ISBE should also take into account the availability of early childhood services for low income and students at risk of academic failure.

Section 3.3 State Support and Improvement for Low-Performing Schools

Because student achievement is strongly correlated with socio-economic status, plans to improve school outcomes should include connecting students and families to resources for family nutrition, health care, economic support, job training, higher education, and housing. Schools should include in their school improvement plans information about early childhood resources, and how they will work with their community to improve school readiness.

Section 4.2 Support for Educators

To promote equity, we strongly support ISBE’s proposal to utilize Title II funds for professional development for administrators and teachers on meeting the needs of English Learners; family and community engagement; social and emotional issues; cultural, racial, and socio-economic competence; conflict management; students with disabilities; family and community engagement; trauma and behavioral health issues; restorative practices; cultural competence; anti-racism; recognizing implicit bias; and actualizing anti-bias approaches.

Section 5.1 Well-Rounded and Supportive Education for Students

B. Equitable access to a well-rounded education in all subject areas

We urge ISBE to incentivize LEAs to use Title I funding to expand early childhood programming. In the event that federal funding is less than anticipated, early childhood should receive priority at the state and local level, including dedicated Title I support for local collaborations that link early learning and elementary schools. LEAs should use evidence-based early childhood education to address the achievement gap and interrupt the past practice of providing opportunity for some, but not all children.

Screening (p.61)

We request that ISBE reexamine the language on page 61 which states that in providing programming at three levels of care and instruction (promotion, prevention, intervention), “districts and schools should provide intensive, individualized supports for those students demonstrating complex, multi-faceted needs, including developmental screenings that could lead to additional supportive services.” Generally, developmental screening should be used as a tool in a universal approach to promote healthy

development, rather than as an intensive, individualized support. (Following a screening, if concerns are identified, then the family of a child under age 3 may be referred to Early Intervention for an evaluation of eligibility for services, or older children may be referred for further evaluation as appropriate.) As an example of the universal use of developmental screening, SB565, which currently awaits the Governor's signature, provides that the health examination for all school children shall include an age-appropriate developmental screening and a social and emotional screening.

We also support the recommendations of the Illinois Early Learning Council on the second draft of the ESSA plan. If you have any questions about these comments, please contact me at (312)757-5105 or anncourter@povertylaw.org.

Sincerely,

Ann Courter

The Sargent Shriver National Center on Poverty Law
50 E. Washington Street
Chicago, IL 60602

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at the Department of Teaching and Learning at Southern Illinois University Edwardsville (SIUE) for the past 9 or more years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

SIUE was the fiscal agent and lead institution for two Illinois State Personnel Development Grants (SPDG) over the past 11 years. The Illinois ASPIRE (SPDG) grant was designed to provide professional development to Illinois schools on the implementation of Response to Intervention, and the IHE Partnership (SPDG) was designed to assist higher education faculty in integrating the Illinois Professional Teaching Standards into course curricula and practicum experiences. The focus of the project was to ensure that effective teaching practices are infused in preservice programs and to evaluate the progress of implementing a Multi-Tiered System of Support (MTSS; also known as Response to Intervention and Positive Behavioral Interventions and Supports) into pre-service educator higher education programs.

Both of these SPDG's received technical assistance from both Illinois PBIS and, most recently by Midwest PBIS Network. Much of the professional development used in these two grants had a foundation in PBIS professional development strategies and the PBIS statewide implementation model.

As a result of these two grants, in-service teachers and preservice teachers and administrators are educated on the use of research/evidence based instruction, monitoring student performance over time, and using academic and behavioral data to make instructional decisions.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports

and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:

- Trauma-Informed Environments
- Positive Behavior Interventions and Supports (PBIS)
- Classroom Management
- Anti-Bullying Programming
- Restorative Practices
- Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
- Check-In, Check-Out (CICO)
- Family Engagement
- Education Environment Practices
- Person-centered Planning Practices (wraparound, Care Coordination, etc.)
- School-Community Partnerships

Sincerely,

Phillip M. Weishaar, PhD
Associate Professor
School of Education Health, and Human Behavior
Southern Illinois University Edwardsville

SOUTHWESTERN

COMMUNITY UNIT SCHOOL DISTRICT NO. 9

Administrative Offices – 201 East City Limits Road, Brighton, IL 62012

“Southwestern Students Succeed”

MARK B. SKERTICH
Superintendent

Phone (618) 372-3813
Fax (618) 372-4681

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Southwestern CUSD #9 for the past six (6) years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

Over the past six (6) Southwestern's attendance rate has increased to nearly 97%, out of school suspensions have decreased by nearly 30%, family engagement is on the rise and our district test scores are exceeding the state average since initiating PBIS throughout the district. The fact is, PBIS is making a difference and I am requesting Illinois' plan include the following:

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - o Trauma-Informed Environments
 - o Positive Behavior Interventions and Supports (PBIS)
 - o Classroom Management
 - o Anti-Bullying Programming
 - o Restorative Practices
 - o Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - o Check-In, Check-Out (CICO)
 - o Family Engagement
 - o Education Environment Practices
 - o Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - o School-Community Partnerships

Sincerely,



Mark B. Skertich
Superintendent

“Proud to be Piasa”



December 16, 2016

Jennifer E. Gill
Superintendent

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Springfield Public School District 186 for several years and we have recently added a braided approach with Behavior Intervention Support Teams and Restorative Practices. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

We would like to share with you the impactful results of PBIS in our school. As I visit schools I see active engagement around teaching expectations, supporting strong Tier 1 supports, and the implementation of intervention in a variety of ways. We currently have seven schools who are designated as Bronze, twelve schools that are designated as Silver, three schools that have a gold designation, and one platinum school that has become a strong outlier and serves as a model for our District. For the last 10 years we have invested in a District level PBIS coach that can support schools on their journey. Our suspension data has steadily improved and our attendance rate rose to 93 percent this school year.

School Districts are constantly taxed with providing structures and means to support staff learning on developing supports and utilizing data within a multi-tiered system for Tiers 1, 2 and 3. This might include training on evidence based practices such as Check-In/Check-Out, Functional Behavior Assessment and Behavior Intervention Plans, and Wraparounds. The technical assistance and opportunity to network with other schools through Coaches Networking Meetings help us access and support fidelity measures through the PBIS system.

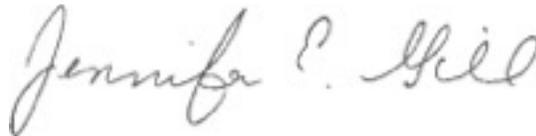
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217/525-3000 • FAX 217/525-3005 • TDD 217/525-3023 • www.sps186.org

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. Therefore I request that Illinois's plan includes the following:

1. Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
2. Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
3. ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Behavioral Intervention Support Teams (BIST) models of support
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

A handwritten signature in cursive script that reads "Jennifer E. Gill".

Jennifer E. Gill
Superintendent of Schools

St. Clair ROE 50 School Improvement Grant Team

Draft #2 ESSA Feedback Team Members- IARSS Liaison Dr. Gabrielle Schwemmer, Rock Island Academy On-Site David Lund, Frances Willard On-Site Stephen Westrick, Gordon Bush Elementary On-Site Gloria Oggero, Mason Clark Middle School On-Site Judy Smith, Mason Clark Middle School Instructional Coach Michael Kelly, Lincoln Middle School Instructional Coach Katie Coyle

Draft #2 ESSA Comments for Further Consideration

English Learners

30% or more of ELL is unrealistic. Not all school districts will have the necessary resources to service children speaking Burmese or Karen. Providing student services in their native language is a federal mandate which often is ignored due to lack of resources. This may be the case for content assessments, as well. How would ELL IEP students receive services for read aloud accommodations in their native language for ALL native languages? All technology based assessments would have to accommodate all languages beyond the ten identified in Draft #2.

Accountability System

We agree with the pathways and indicators for College and Career Readiness, as well as Distinguished Scholars criteria. The growth model preferable to our team would be Student Growth Percentiles to accommodate all individual learners. With the introduction of new language in ESSA, adding more complicated models would be confusing and difficult to communicate to stakeholders. We would urge consideration in using the “school’s level of poverty” as part of the school quality indicators. In schools lacking EL Proficiency, how will the formulas be modified? We are in favor of a 51%/49% weighting for indicators in effort to account for substantial weight on the school success indicators. This allows for factors beyond our control to be minimized, such as homelessness, lack of pre-natal care, nutrition, etc. Of the three scenarios shared, two benefit from implementing the 51%/49% split. This proves the formula shows a more accurate positive reflection for schools, which should be the ultimate goal for our schools. The school success indicators prove vital to the true reflection of all schools.

Meaningfully Differentiating Schools

For levels of school performance, we highly suggest using common and consistent language across education. In place of “initial”, “growing”, “meeting”, and “exceeding”, we recommend utilizing Danielson terminology of “distinguished”, “proficient”, “needs improvement”, and “unsatisfactory”.

Other Matters Regarding Accountability

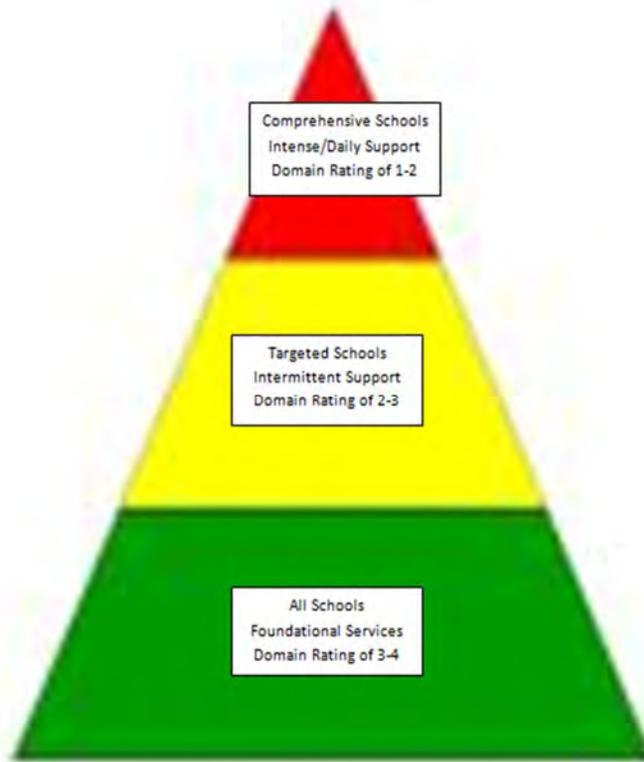
More clarification is necessary regarding military status, students whose parents are members of the National Guard and/or Reserves, with the assumption you are considering active duty status. It would be cumbersome to identify when members are activated. How would schools be notified to provide appropriate services?

St. Clair ROE 50 School Improvement Grant Team

Identifications of Schools

We recommend inserting a graphic as shown below as a visual for this metric. We question the fidelity of the second metric of identifying schools with four year graduation rates less than 67% that have not already been identified in the lowest performing 5%. How many schools would be identified by this metric? We assume schools with graduation rates below 67% would be identified in the first metric of the lowest performing 5%. Transparency is appreciated to ensure this isn't targeted to one specific region. This comment **"but there are clearly schools and districts across the state that, based on past school improvement efforts, are ready to continue the school improvement process without a planning year"** could be revised because it negates the first sentence proving a planning year is beneficial. Unless, this pertains specifically to schools in the implementation of an existing SIG grant. Changes in external partners may require that planning time to become acquainted with the school dynamics. In the exit criteria, this must be based upon reaching the completion of a full grant cycle. We highly recommend analyzing the improvement data from previous support given to focus schools. There is concern of the quality of services and accountability of current state-wide systems of support vs. the quality of services and accountability of SIG school partners. It would be an injustice to all stakeholders to flow massive amounts of money to retain organizations who are ineffective in targeted and comprehensive schools, currently priority and focus schools. We must prevent outside, for profit consultants and providers from coming into our unique state stripping the schools of their time, money, and acceleration. We recommend flowing funds collaboratively through a state agency, such as ROE's, instead of LEA's. These schools identified typically mismanage funds, creating the situation they are in to identify them as low performing. They rarely invest in curriculum to enhance instruction; otherwise they would be performing competitively. What is the composition of IL-EMPOWER? What is its function? Is this a separate entity other than ISBE? There is redundancy in language on pages 42 and 44. On page 45, there is confusion on whether the planning year will be funded. If not, how will an external partner be identified and how will they contribute to the planning? On page 46, **"the level of "need" of the school and district"** is already identified in the criteria. **"The quality of the plan itself and readiness of the schools and districts to implement the plan effectively"** should be considered prior to allocating funding.

St. Clair ROE 50 School Improvement Grant Team



The team supports the content in Draft #2 for Goals, Support for Educators, and Other State-Identified Strategies. We strongly agree with the decision to add in mental health services for the students in Illinois. We thank you for your hard work and dedication to the educators and students in Illinois.



December 23, 2016

Dr. Tony Smith
State Superintendent
Illinois State Board of Education
100 W. Randolph, 14-300
Chicago, Illinois 60601

Dear Dr. Smith:

The comprehensive approach you are taking to collect stakeholder feedback in connection with Illinois's implementation of the Every Student Succeeds Act ("ESSA") continues to be a model process among states.

Stand for Children is a member organization representing parents in several communities across the state. Our parent members travelled to Washington D.C. twice to participate in the public conversations around the reauthorization of No Child Left Behind and urge a continued focus on educational equity. With the passage of ESSA, they have closely followed the work here in Illinois and participated in several listening tours. Stand for Children is grateful for the opportunities you and your staff have provided for us to share our perspective as Illinois moves toward a fair accountability system that recognizes outstanding schools, supports schools that are struggling, and maintains a strong focus on student learning.

We feel that several positive changes are evident in the second draft. **First, thank you for proposing an "n-size" of 20.** Illinois's current n-size of 45 is among the largest in the country. Federal regulations now suggest, and many states currently, use n-sizes of 20. We recognize that there is a balance to strike between the reliability of data and inclusion of subpopulations of students, and we appreciate your efforts to move toward more inclusion. **We also appreciate your creation of a new "former English Learner" subgroup.**

We hope you will consider these suggestions to strengthen your next draft:

1. **Incorporating subgroup scores.** We continue to have concerns with the way in which subgroup ratings will be incorporated into summative scores. The draft proposes several options for weighting the required and other indicators, but none include suggestions for how subgroup weights would be applied. As we said in our comments on the first draft: "Demonstrating

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success within each subgroup should be given significant weight. This should not be an asterisk or a footnote to an otherwise high rating; the system should never allow a school to get the highest rating if it is failing any of its student populations.” There are several ways to accomplish this and we are open to variations on any of these:

- a. The Education Trust has proposed that each subgroup be given equal weight within each indicator. For example, if student growth counted for 40% of the total score, each of eight groups (all students, African-American, Latino, White, Asian, low-income, ELs, and students with IEPs) would count as 5% of the total score.
 - b. Another option would be to count the all-student score for half of the total for each indicator and to divide the remaining half among under-represented subgroups based on the percentage of the population of each. For example, if student growth counted for 40% of the total score, the all-student score would count for 20% of the total and 20% of the remainder would be divided among subgroups, each weighted based on percentage of the total population comprised by those subgroups.
 - c. A third option would be to calculate summative ratings for all students and then undergo another round of analysis before applying the summative score. Districts that fail to demonstrate success within a subgroup would be moved down one rating level. This is less cohesive than the above options, but it would comply with the federal regulation requirement that no school that fails its subgroups can earn the highest rating.
2. **Weighting growth more than proficiency or any other indicator.** Your second draft expresses a commitment to equal weighting of proficiency, growth, and English Learner proficiency. It also requests feedback on the overall split between these and other indicators. Under these parameters, it is possible that growth could count for just 17% of the total, which we believe does a disservice to schools that drive substantial learning gains despite significant socioeconomic challenges. Furthermore, both the value tables and growth-to-proficiency growth models double down on measuring proficiency. We support:
- a. **Including the 70/30 split among required and other indicators.** The “other” indicators under consideration are worthwhile practices for which schools should strive in order to drive student learning, but we don’t want to mask the thing that matters most (student outcomes) with things that are designed to get those results (inputs). Focusing the majority of the weight on growth and proficiency will better identify and focus scarce resources on supporting the schools that most need it.
 - b. **Selecting a growth model that measures individual growth.** If proficiency were under-weighted, selecting a hybrid growth model that includes both individual growth and growth-to-proficiency would also make sense. But using proficiency and growth-to-proficiency leaves little incentive to improve outcomes for gifted students and little reward for improving outcomes for students far below grade level.



- c. **Adding PSAT in high school.** The SAT given once in high school as the only statewide high school assessment is insufficient. Illinois needs a high school growth model. Adding the PSAT in high school would provide this.
3. **Prioritizing Diverse Educator Pipelines.** We appreciate that ISBE is waiting for recommendations from the Teacher and Leader Effectiveness (TLE) committee of the P-20 Council to finalize its Title II recommendations. We are following the committee’s work and are eager to see its final recommendations around residency programs and academies, which we hope will include prioritizing recruiting diverse candidates to these programs. We also support funding for the Diverse Educator Exchange. We hope your final ESSA plan will include a commitment to building the racial, gender, and linguistic diversity of Illinois’s teacher.
4. **Expediting the timeline.** Your draft proposes establishing a three-year baseline for graduation and growth data from 2017-2018 – 2019-2020. Again, we understand that there are trade-offs to consider between having the most accurate data and providing intervention more quickly. In this case, we hope you will consider a more expedited timeline so that we can identify schools more quickly and get right to work supporting their students. We have data from previous years that can be used to get a jumpstart on calculating baseline data.
5. **Improving the supports and interventions process.** This is the most important piece of the system, but it seems to be the one that has had the least amount of stakeholder engagement. We continue to have concerns about those districts that lack expertise and capacity to put together and implement a strong plan. We also suggest that the ESSA plan require deeper intervention for schools that fail to demonstrate improvement after a specific amount of time to implement their plans. In addition, because we have such an inequitable funding system overall, we hope that ISBE’s allocation of Title I set-aside funds to support schools will only provide additional funds to districts that are under-resourced. Fully-funded districts that need targeted or comprehensive support should be required to fund their improvement plans with their existing resources.
6. **Summative scores.** Parent-friendly ratings are important so that the people who depend on our public schools can easily understand the quality of their child’s school. We support summative ratings alongside an easy-to-understand dashboard of information that clearly shows families how their schools are doing overall and in key areas. Given the number of ratings a school may have (for example, a 2+ from CPS, a 6 from greatschools.org, a “growing” from the state, and a “targeted support” from the DoE), consider continuing with the ratings of “comprehensive support” and “targeted support” allowed in the final regulations and expanding the categories for those schools not identified for support (for example, “approaching, meeting, exceeding, and excelling”).



Thank you again for the opportunity to provide feedback on your draft. We looking forward to continuing to work with you and your staff as development of the plan continues.

Sincerely,

A handwritten signature in black ink, appearing to read "Mimi Rodman". The signature is stylized with a long horizontal line extending to the right.

Mimi Rodman
Executive Director

Recommendations for Illinois ESSA State Plan:

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Send via email to essa@isbe.net

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Streamwood High School for many years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

I have been working on MTSS Tier III for the last year with our team at Streamwood High School. MTSS Tier III has been able to collect meaningful data and strategies to help our highest needs students. Streamwood high school would be a very different place without MTSS or PBIS

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation, fidelity, and sustainability of the following supports and integrated evidence-based practices for district and schools as recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices
 - Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
 - Check-In, Check-Out (CICO)
 - Family Engagement
 - Education Environment Practices
 - Person-centered Planning Practices (wraparound, Care Coordination, etc.)
 - School-Community Partnerships

Sincerely,

Allison Koch,
Teacher of the Deaf and Hard-of-hearing
Streamwood High School

INTRODUCTION

The passage of the Every Student Succeeds Act (ESSA) creates a unique opportunity to refine our state's accountability system and redesign our supports for effective teachers. ESSA recognizes the importance of classroom teachers, who are the main implementers of education policy, by requiring teacher engagement in the creation of the state's ESSA plan. In the report below, we present the ideas of 347 teachers from around Illinois on the design of the accountability system and the changes needed to ensure that every child in Illinois has access to excellent teachers. Teachers came to three main conclusions:

1. Teachers strongly support two of the Illinois State Board of Education's (ISBE) four proposed indicators: chronic absenteeism and 9th grade on track. Teachers also strongly support additional indicators that capture school environment, college and career readiness, and students' access a well-rounded education.
2. Teachers strongly support ISBE's proposed composite college and career readiness indicator, particularly the experiential benchmarks such as attendance and workplace learning.
3. To improve teacher effectiveness through Title II funding, teachers showed strong support for evidence-based classroom size reduction and professional development that is ongoing, job-embedded, and teacher led, and some indicated support for improvement in teacher evaluations

METHODOLOGY

Teach Plus Fellows are current classroom teachers from districts in Illinois, ranging from Carbondale in the south to Round Lake in the north. Between November 10 and December 17, these teachers conducted 20 focus groups with 347 of their peers, representing 78 school districts throughout the state. During the focus groups, Teach Plus Fellows provided an overview of ESSA and identified three areas for teacher feedback: accountability indicators, college and career indicators, and uses of Title II funding. Within each area, the Fellow provided a brief overview, facilitated a conversation in the focus group, and asked participants to fill out a short questionnaire that included both open-ended and close-ended questions.

SECTION 1: ACCOUNTABILITY INDICATORS

The teachers in our focus groups supported a range of school quality indicators that present a holistic picture of school quality. Teachers strongly supported two of ISBE's four proposed indicators, but also indicated support for additional indicators that capture school environment, college and career readiness, and students' ability to access a well-rounded education.

Feedback on ISBE’s Four Proposed Indicators

Teachers in the focus groups indicated very strong support (60% or greater) for two of ISBE’s four proposed indicators. Support was strongest for a 9th grade on-track metric, with 69.2% of teachers supporting the inclusion of this metric. An indicator of chronic absenteeism also received strong support, with 60.6% of teachers supporting this measure. However, this indicator also had the highest opposition, with 18.4% of teachers opposing the measure.ⁱ Support for the other two proposed metrics was somewhat weaker, though above 50% in both cases.

| Table 1: Support for ISBE’s Proposed Indicators of School Quality | % of Respondents who Strongly Support or Somewhat Support the Indicator |
|----------------------------------------------------------------------|-------------------------------------------------------------------------|
| 9th Grade on Track (9-12) | 69.2% |
| Chronic Absenteeism (K-12) | 60.6% |
| Success in AP/IB/Dual Credit/CTE (9-12) | 53.6% |
| Pre-K-2 Indicator (K-8) | 56.0% |

Teachers were particularly passionate about chronic absenteeism as a measure. They indicated the importance of regular attendance as the first step in learning as well as the difficulty of being successful while dealing with gaps in instructional time. One teacher from Elmwood Park CUSD 401 preferred this indicator because it applied to all students, “It is important to have an indicator that spans across grade levels.” Another teacher from Murphysboro CUSD 186 said, more simply, “Students cannot learn if they are not present.” However, some pointed out that teachers have little influence over chronic absenteeism with students and will rely on other school personnel to monitor and address this issue.

Chronic absenteeism is most important because we need to know what’s preventing students from coming to school and what we can provide to help students not lose instruction time – Teacher from Maywood, School District 89

Another theme that emerged from the focus groups is that early intervention is key. This idea was most commonly presented by those supporting a Pre-K-2 indicator but also by cited by proponents of the 9th grade on-track indicator. Data that is collected after students leave, such as graduation rate, is informative but not actionable. Teachers feel that they have the power to influence students’ success with information early on that they can utilize to address student deficits. A Catholic school teacher in Chicago noted, “It is easier to get students back on track when they are just starting their educational journeys than to try and make up the lost time when they are older.” Likewise, a Chicago Public Schools teacher thought the “pre-K-2 indicator would be the most beneficial. Addressing students in this age range would alleviate many issues down the line.” There is a desire for an indicator similar to 9th grade on-track that would be applicable for middle and early grades, and if such an indicator is not yet available we encourage ISBE to work with the research community to develop one for a future iteration of the ESSA plan.

Feedback on other possible indicators of school quality

Teachers indicated strong support for additional metrics that would show a more well-rounded view of educational success. Presented with 20 different potential indicators that were named in the state plan, five garnered strong support from teachers. The full results are presented below, with those measures garnering 60% or greater support highlighted in **bold**.

| Table 2: Support for Additional Indicators of School Quality | | % of Respondents who Strongly Support or Somewhat Support the Indicator |
|---------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------|
| Academic Indicators | | |
| % Students with Successful Completion of Student Portfolio | | 39.6% |
| Combined Lexile reading level | | 52.4% |
| Student Dropout Rates | | 56.9% |
| Kindergarten Individual Development Survey (KIDS) readiness indicator | | 42.9% |
| “Ready to Learn” K-2 academic indicator (to be developed) | | 44.0% |
| Longitudinal data on current and former English Learners (such access to AP/IB, graduation rates, etc.) | | 49.1% |
| School Climate Indicators | | |
| % of students suspended or expelled | | 42.3% |
| Safe environments (as measured on the 5Essentials survey) | | 70.2% |
| % of students with access to physical activities such as sports or recess | | 64.2% |
| % of students who participate in extracurricular activities | | 47.3% |
| 5Essentials Survey (Composite Score) | | 53.6% |
| Post Secondary Readiness Indicators | | |
| % Freshmen on track at end of 9th grade | | 67.8% |
| % of students with postsecondary plan | | 52.2% |
| % of students earning postsecondary credentials (AP/IB/CTE/Dual Credit) | | 46.1% |
| % of students enrolling in college | | 50.0% |
| % of students who are College/career/workforce ready (also see Part II) | | 73.6% |
| Non-Academic Factors: | | |
| % of students with access to arts and enrichment coursework | | 66.8% |
| % of students completing arts and enrichment coursework | | 56.2% |
| % of students with chronic absenteeism | | 51.6% |
| % of students earning the State Seal of Biliiteracy | | 25.4% |

Discussion in the focus groups revealed several themes. One was the importance of non-academic factors, such as access to physical education, arts, and enrichment programs. Access to arts received support from 66.8% of teachers, and 64.2% supported access to PE or recess as an indicator. Many respondents mentioned that arts and physical education lead to a well-rounded education, allow students multiple avenues for success in addition to traditional reading and math scores, and have standards that can be assessed and will lead to academic improvement. One teacher at the UNO Charter School Network in Chicago noted that PE and recess

“are not valued by school districts because they are not academic, [but] they are absolutely important to student brain development.”

A second theme that developed was a strong desire for a reliable tool for measuring school climate. Over 70% of teachers supported using the 5Essentials to measure school safety. In the open responses, more than a dozen respondents explicitly mentioned the 5Essentials Survey by the University of Chicago Consortium as being a fair evaluative tool for judging school climate based on the feedback of a variety of stakeholders, including the students themselves, and that the 5Essentials produces easy to understand results that can be tracked from year to year.

Finally, many teachers emphasized the importance of demonstrating student growth through portfolios or other assessments and assessing students at the early and late stages of their academic careers. Respondents suggested that growth could be demonstrated through examining lexile scores, using student portfolios, or items such as the Northwest Education Association’s Measures of Academic Progress (NWEA-MAP) test.

Schools cannot control their clientele. They can only work to grow students from the point they enter. Schools may have low overall success rates but can be making great strides in moving students forward. This growth needs to be acknowledged and given high consideration. Other schools with high success rates might actually be losing ground with students. A growth score would illuminate these areas of need as well. – Teacher from Harlem School District 122

SECTION II: COLLEGE AND CAREER READINESS

Teachers strongly support the composite college and career readiness indicator. Of the teachers in our focus groups, 68.3% were very or somewhat satisfied that the framework represents whether a student is college or career ready.ⁱⁱ Most teachers agreed with this teacher from Glen Ellyn School District 41 who said, “I appreciate that it looks at different areas of the student and not just academic testing.” However, 52.9% were only “somewhat satisfied”, indicating that there is room to improve the indicator. Many teachers took issue with specific indicators within the framework. The detail below indicates which parts of the composite measure have the most backing and where changes are needed.

The indicator proposed by ISBE has three categories, and teacher support varied by category and by indicator within the category. The three categories are:

- Academic and standardized testing benchmarks
- Academic benchmarks and industry credentials
- Behavioral and experiential benchmarks

Support was strong for all three categories, but strongest for the four proposed experiential benchmarks. More than 65% of teachers supported all four of the experiential benchmarks, and more than 75% supported the attendance and workplace learning benchmarks. A teacher from Washington District 52 noted, “It is

important to have a wide range of ways to show success...the attendance, community service, extracurricular and workplace learning help this [metric] to be more fair to all students.”

Support was also strong for the inclusion of GPA and SAT, albeit with some reservations. GPA as an indicator was supported or strongly supported by 69.9% of teachers, while use of SAT was supported by 60.2% of teachers. Reservations about the SAT centered on concerns such as, “students are more than test scores,” but most teachers appreciated the balance of academic and non-academic indicators.

| Table 3: Support for ISBE’s Proposed Indicators of College and Career Readiness | % of Respondents who Strongly or Somewhat Support the Indicator |
|------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Academic and Standardized Testing Benchmarks | |
| GPA of 2.8 out of 4.0 | 69.9% |
| College readiness entrance score on the SAT | 60.2% |
| Benchmarks or Industry Credentials | |
| Industry Credential (eg, Welding certificate or EMT license) | 69.4% |
| Dual Credit Career Pathway Course (achieve a grade of A, B or C) | 69.5% |
| Advanced Placement Exam (Achieve a grade of 3, 4 or 5) | 62.9% |
| Advanced Placement Course (Achieve a grade of A, B or C) | 62.3% |
| Dual Credit College English and/or Math (Achieve a grade of A, B or C) | 68.1% |
| College Developmental/Remedial English and/or Math (Achieve a grade of A, B or C) | 61.5% |
| Algebra II (Achieve a grade of A, B or C) | 57.8% |
| International Baccalaureate Exam (Achieve a grade of 4 or better) | 41.7% |
| Behavioral and Experiential Benchmarks | |
| 90% Attendance | 76.5% |
| 25 hours of Community Service (or military service) | 70.2% |
| Workplace Learning Experience | 78.2% |
| Two or more organized Co-Curricular Activities (including language and fine arts) | 65.9% |

Support was the most varied for the academic and industry benchmarks. Support for these benchmarks ranged from a high of 69.5% for a Dual Credit Career Pathway Course to a low of 41.7% for success on an International Baccalaureate (IB) exam. Common concerns focused around an overemphasis on college in the benchmarks to the exclusion of students who are not college bound. For example a teacher from CUSD 303 in St. Charles noted, “AP and IB programs only address a small percentage of our students, not the majority. The indicators need to be more equitable for all levels of students, not just top performers.”

An additional theme that emerged was the importance of vocational education as a career pathway out of high school or as a foundation for other collegiate opportunities. A teacher from Crystal Lake SD 47 noted, “Only one of the indicators supports the trades. That needs to be increased. Too much emphasis is put on ‘all kids go to college’ [when] not all kids are college ready or interested in going to college.” Another teacher from Hillsboro CUSD 3 echoed this comment: “I strongly support readiness by application and practicums which include as many workplace skills and industry certifications as possible.”

PART III: SUPPORTING EXCELLENT EDUCATORS

During our focus groups, we shared with teachers the list of district-allowable uses to support excellent educators through Title II funds. We asked them to choose up to five uses for these funds that they felt districts should prioritize in order to improve teacher quality. Two uses received support from more than half of the teachers: reducing classroom size to a level that is evidence-based was chosen by 77.2% of teachers, and providing high-quality, personalized professional development that is evidence-based was chosen by 54.5% of teachers. In both cases, it is important to emphasize that ISBE needs to use the evidence-based criteria as a guideline for approving use of these funds, as the effectiveness of classroom size reduction and professional learning can vary greatly. The full list of responses can be found in Appendix A.

Classroom Size Reduction

A common theme that stood out in the discussion was the importance of reasonable class sizes. Most of these respondents referenced their own experiences with large classes, so it is reasonable to conclude that this issue is the most important to those affected by it, while those who already have manageable class sizes focused on other issues. A teacher from Round Lake SD 116 emphasized the personal attention that teachers can give in smaller classes, “Class sizes are critical to students having access to teachers and for teachers to be able to know each student well enough to provide the appropriate level of support/challenge.”



I teach 42 kids in one class. 42. That is ONE class out of the 4 that I teach. And I am expected to make them grow at the same rate? – Teacher from Chicago



While we acknowledge the teacher emphasis on class size reduction, the research on the effectiveness of class size reduction is decidedly mixed. A literature review in 2014 by Basha Krasnoff of Education Northwest concluded that “there is no evidence that minimal or arbitrary reductions in class size will improve student performance.”ⁱⁱⁱ Rather, the greatest gains are from primary grade classes of fewer than 15, and gains in these grades are particularly strong for minority and low-income students. However, weak instructional practice will lead to weak student performance regardless of class size, suggesting that districts should carefully choose between strategies focusing on retaining and improving teachers and reducing class size, particularly if the additional teachers are inexperienced. Finally, nearly 2/3 of Illinois districts receive less than \$50,000 in Title II funding, a level of funding which makes reducing classroom size to evidence-based levels nearly impossible.^{iv} As a result, we urge ISBE to be cautious in approving class size reduction under Title II.

Professional Development

A common theme raised by teachers in discussion was the importance of flexible, relevant, research-based professional development. Some mentioned specific programs, like National Board certification, Next Generation Science Standards training, or AP training, but most simply wanted the ability to select the most relevant training for them to apply in their own classrooms. Many pointed out the direct effect professional learning would have on student success. A teacher from Argenta-Oreana CUSD 1 pointed out that, “being able to personalize PD means the teacher can learn a new practice and implement it immediately in their

classroom.” Another from Elmwood Park CUSD 401 noted the need for sustained professional learning, “Continuous PD also allows teachers to use up-to-date methods of instruction.”

There is now strong evidence for what is considered effective professional development. For example, effective professional development focuses on content knowledge and pedagogical content knowledge, creates collaborative and active learning opportunities for teachers, and is sustained over at least 20 hours during the school year.^v ISBE should ensure that any uses of Title II funds follow these guidelines.

CONCLUSION

ESSA is a unique opportunity for Illinois to broaden its expectations for schools, correcting some of the problems of the NCLB era while maintaining a steady focus on improving outcomes for all students. We are encouraged that the Illinois State Board of Education has developed a robust engagement strategy in developing its ESSA plan and are pleased to add the voices of teachers from around Illinois. As the plan continues to develop, we urge ISBE to continue engaging those that will be tasked with implementing ESSA – the 100,000 teachers that work in schools Illinois. Ensuring that teachers are actively engaged in the development of the plan will ensure a better plan, and one that that teachers can support as districts begin implementation in 2017-2018.

APPENDIX 1

| Table 4: Teacher Preferences for Use of Title II Funds to Improve Teacher Quality | % of Respondents who chose this use (respondents chose up to five uses) |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Developing or improving a rigorous, transparent and fair evaluation and support system for teachers, principals, and other school leaders. | 41.3% |
| Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers. | 30.8% |
| Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders. | 6.9% |
| Reducing class size to a level that is evidence-based. | 77.2% |
| Providing high-quality, personalized professional development that is evidence-based. | 54.5% |
| Providing training, technical assistance, and capacity-building in local educational agencies to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing class-room-based assessments, and using data from such assessments. | 22.8% |
| Carrying out in-service training for school personnel in the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness; the use of referral mechanisms; forming partnerships between school-based mental health programs and mental health organizations; and addressing issues related to school conditions for student learning. | 22.5% |
| Providing training to support the identification of students who are gifted and talented and implementing instructional practices that support the education of such students. | 19.8% |
| Supporting the instructional services provided by effective school library programs. | 13.5% |
| Providing training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse. | 2.7% |
| Developing and providing professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science. | 35.0% |
| Providing high-quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning (if appropriate). | 33.2% |
| Developing feedback mechanisms to improve school working conditions. | 25.4% |
| Developing programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners. | 30.8% |
| Providing programs and activities to increase the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing and the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age 8. | 32.3% |

ACKNOWLEDGEMENTS

Teach Plus Illinois would like to acknowledge the 2016-2017 Teaching Policy Fellows, who conducted the focus groups for this report, and select Fellows who served as co-authors.

2016-2017 Teaching Policy Fellows

| | | |
|---------------------|--------------------|----------------------|
| * Brigid Bennet | Sarah Kuntzman | Shonda Ronen |
| Gina Caneva | Lani Luo | Kali Skiles |
| * Bill Curtin | Ashley McCall | * Jennifer Smith |
| Katie Curtin | Paige Passman | * Nick Vassolo |
| Traci Dean | Cynthia O'Brien | Rebecca Wattlesworth |
| Maggie DePoy | Michelle Poelsterl | Sarah White |
| Casey Fuess | Amanda Purkeypile | Stacy Wright |
| * Jennifer Hartmann | Keira Quintero | |
| Kelly King | Will Reed | |

Teach Plus Illinois Staff

- * Josh Kaufmann, Executive Director
- Kristen Ciciora, Teacher Engagement Manager
- Sarah Campbell, Executive Support and Projects Associate

* Indicates Lead Author

ENDNOTES

ⁱ Question: “To what degree do you support or oppose the use of chronic absenteeism as an indicator of school quality to be used as part of the new accountability system?” (N=343) Responses “Strongly Support” (37.9 percent), “Somewhat Support” (22.7 percent), “Neither” (7.9 percent), “Somewhat Oppose” (10.5 percent), “Strongly Oppose” (18.7 percent), “Unsure” (2.3 percent).

ⁱⁱ Question: “ISBE has developed a composite indicator college and career readiness. This composite indicator is a framework which includes test scores, industry and academic credentials, and behavioral and experiential benchmarks. How satisfied are you that this framework represents whether a student is college and career ready? (N=319) Responses “Very satisfied” (9.1 percent), “Somewhat satisfied” (59.2 percent), “Not very satisfied” (15.0 percent), “Not at all satisfied” (4.4 percent), “Unsure” (12.2 percent).

ⁱⁱⁱ Krasnoff, Basha (2014). *What the Research Says About Class Size, Professional Development, and Recruitment, Induction, and Retention of Highly Effective Teachers*. Northwest Comprehensive Center, p. iii.

^{iv} Illinois State Board of Education (2016). *FY17 Title IIA Allocations – Projected*. Retrieved from:

<https://www.isbe.net/Documents/nclb-proj-titleIIA-alloc17.pdf>

^v Krasnoff, pp. iv.

December 27, 2016

Illinois State Board of Education
100 North First Street
Springfield, IL 62777

Members of the Board:

As the Every Student Succeeds Act (ESSA) goes into effect, we have the chance to re-think how accountability tools are used to ensure all students have access to high quality schools. As Teaching Policy Fellows with Teach Plus, we have reviewed ESSA State Plan Draft #2, taking a close look at the section dedicated to school interventions. We recognize that ISBE is taking time to develop a thorough accountability tool that will highlight the areas in which schools are excelling and struggling. We also appreciate that once schools are identified as failing, ISBE is not looking to jump to punitive measures without first providing supports and interventions. However, to ensure all schools are providing a quality education to our students, we need to make sure that struggling schools are being held accountable to improve. We see that there is a clear identification process as well as exit criteria and this transparency is a crucial piece for holding all schools to high standards. However, there is some ambiguity as to how exactly interventions will be funded, implemented, and monitored. As a result we have the following recommendations:

1. Create a process for vetting IL-Empower vendors, and for tracking the effectiveness of their work and satisfaction of districts that receive their services
2. Strengthen the review of district applications by creating clarity around the “commitment to implement” criteria and through a panel of reviewers that includes teachers
3. Greater transparency on the effectiveness of interventions and use of school improvement funds

Vetting and Monitoring IL-EMPOWER Vendors

The organization of IL-EMPOWER and how it will function are two large grey areas within the second draft of the ESSA plan. Initially, it is important to understand what IL-EMPOWER is and how the professionals that are part of the organization are chosen. What type of qualifications will be required to become part of the IL-EMPOWER network of possible providers? More explanation is needed on the “rigorous review and approval process” for IL-EMPOWER providers. Teachers need to have transparency on the selection process to be able to have confidence in IL-EMPOWER’s representatives; teachers will need to know that these outside providers are true experts in their fields. In addition to the initial vetting process that would allow a person or organization to become part of IL-EMPOWER’s bank of resources, there also needs to be an opportunity for feedback from schools that have used a specific resource and that feedback needs to be available to other schools considering using that particular resource in the future. If an organization under IL-EMPOWER is consistently receiving poor reviews from the schools that it is assisting or if those schools are not showing an adequate level of growth, there needs to be a quality control mechanism in place to ensure IL-EMPOWER continues to provide quality support for failing schools.

Strengthen the Review of District Applications

We have three suggestions to improve the currently outlined process of applying for school improvement funds. First, there is little guidance for what constitutes the required “stakeholder input.” Explicitly requiring input from current classroom teachers in school plans, would help to ensure that plans are realistic, feasible, and in the best interest of the students.

Secondly, there is still some ambiguity about how a school is to demonstrate the “strongest commitment to implement.” How is commitment to implement going to be measured? By whom? And how is this commitment to be tracked over the 4 years of the targeted or comprehensive improvement

plans? In addition, if a school is not ready to implement a proposed plan, what is the next step? Are there supports available or a potential deadline to demonstrate readiness?

Finally, the plans must have a uniform and fair method of being assessed. We recommend that a committee of experts, which includes a membership that is made up of at least 50% of current classroom teachers, should examine these plans with a uniform assessment rubric. This panel would use rubric assess the three criteria set forth by ISBE in the creation of a comprehensive high-quality plan (greatest need, readiness to implement, and strongest commitment to implement).

Greater Transparency on the Effectiveness of Interventions and Use of Funds

ESSA clearly defines four levels of research-based requirements that qualify interventions to be included in school plans. A helpful tool to include in the IL-EMPOWER network would be to have these levels included in the descriptors of each intervention so that schools can access this information prior to selection of a particular intervention or program offered by a vendor. Fellows strongly recommend that each intervention offered on the IL-EMPOWER network includes the school accountability record of the schools that have used that intervention in the past, surveys completed by districts that have used that particular program before, and other information so that schools can choose the best options to include in their school improvement planning based on their local needs.

We also feel it is a vitally important for ISBE to be fully transparent about the funds each school is receiving and how much each IL-EMPOWER support or intervention costs. In order to reduce redundant efforts on the part of both ISBE and local school districts, the school improvement interventions funding should be included on the school accountability report every year. This way schools will be accountable to their stakeholders to appropriately invest the funds given by ISBE through the IL-EMPOWER network on the items included in their approved school improvement documents. This will also allow ISBE to keep track of which interventions are being chosen across the state, how much they are costing, and how successful they are over the course of a period of many years. This will create a bridge between the state, the vendors on the IL-EMPOWER network, local school districts, and stakeholders at all levels of the Illinois educational process while making the re-evaluation of ESSA and IL-EMPOWER data-rich and easy to longitudinally evaluate as time passes.

Finally, we want to recognize that the biggest factor for ESSA to truly work in Illinois is adequate funding for all Illinois schools. Revamping the Illinois funding formula and increasing the Per Pupil Cost is imperative. If we really want to change the face of education in Illinois for ALL students regardless of race, where they live or socioeconomic status, Illinois must make a true investment in education. These limited school improvement funds will not suffice to close the gap in historically underfunded districts. The state must develop pathways that lead to funding equity for ALL students in Illinois. The future of our children and state depends on it.

Respectfully,

Teach Plus Policy Fellows

Brigid Bennett
Jennifer Hartmann
Sarah Kuntzman
Michelle Poelsterl, NBCT
Stacy Wright, NBCT

December 26, 2016,

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777

Members of the Board, Superintendent Tony Smith, and ISBE Staff,

As the Illinois State Board of Education works to finalize the state ESSA plan, there is a once-in-a-generation opportunity to rethink the current use of Title II funds in Illinois and how those funds can best support effective teaching in the future. As current teachers in Illinois and Teaching Policy Fellows with Teach Plus, we applaud ISBE's efforts to cast a wide net and solicit feedback from across the state. We have taken a close look at the provisions of Title II and how those funds are currently being spent by ISBE and districts across the state, and we wish to add our voices to the conversation. We have identified two highly effective uses of ESSA funding at the state level, as well as an important gap in oversight that should be filled as the new law is implemented. In short, our recommendations are:

1. Ensure Title II funds are used for high-quality professional development that is consistent, ongoing, collaborative, led by teachers and based on models of excellence currently in place in Illinois.
2. Improve retention and quality through the creation of career pathways, by providing guidance and funding for districts to implement career pathways
3. Collect and share information the use and effectiveness of Title II funds in Illinois

Professional Development

One of the most important and effective factors in improving teacher quality is relevant, research-based professional development. For professional development to be effective, it must be ongoing, consistent, and meaningful to participants, and allow for collaboration.¹ Despite ISBE's adoption of the Standards for Professional Learning, and the standards' insistence on timely, differentiated PD that meets the individual needs of each educator, much of the PD provided in districts still follows an outdated "one-size-fits-all" model and is directed by administrators rather than teachers. Professional teaching requires professional autonomy, including the selection and implementation of relevant professional learning.

In order to help districts provide teachers with meaningful professional learning, we recommend that ISBE utilize state ESSA funds to endorse one or more models for implementing high-quality, teacher-led professional development that can be reproduced in districts across the state. Some larger districts have already developed effective programs that can serve as starting points: U-46 in Elgin, for instance, has created District Collaborative Days in which the District plans PD sessions for teachers to attend. Sessions may be facilitated by peers who have been trained in adult learning principles and been active in the content area in which they are presenting. Most of what is offered is a one-time PD opportunity. The professional development opportunities are offered on 5 different District Collaboration Days, but there are 5 other Personal Professional Development days bargained into the contract that allow ETA members full control over planning and organizing their own PD. The National Board Resource Center at Illinois State University has also developed a PD Schools program that facilitates collaboration over a

¹ Krasnoff, Basha (2014). *What the Research Says About Class Size, Professional Development, and Recruitment, Induction, and Retention of Highly Effective Teachers*. Northwest Comprehensive Center, p. iv. Accessed from: <http://www.k12.wa.us/TitleIIA/EquitableAccess/AppendixE.pdf>

sustained period. ISBE endorsement of these models, and others, would lead to their adoption by more schools across the state. However, smaller districts may not have the resources to sustain a comprehensive in-house PD program and would benefit from connections across district lines. ISBE has already developed regional partnerships through its Common Core partnership with the IBHE; these could be expanded into regional professional development networks that would help smaller schools connect and share best practices. Regardless of the type, professional development should be grounded in teachers' identification of their own professional learning needs and supported by student data and observations.

Career Pathways

In order to improve teacher quality, it is also critical for the best teachers to have opportunities to lead and to share their expertise. Unfortunately, most teachers have the same job title their first day on the job as they will on the day they retire. In addition to creating models for districts to provide the best possible professional learning, ISBE should develop a flexible model that districts can adapt locally to implement career pathways for teachers. This work is not practical at the district level, and individual district attempts would likely have a steep learning curve to overcome that districts could not afford. But by providing a model based on best practices, ISBE could help districts leverage the expertise of their best teachers to improve instruction in every classroom. When the best teachers are able to take on leadership, mentoring, and coaching roles without leaving the classroom, everyone benefits from their expertise. Career pathway models are supported by the National Board for Professional Teaching Standards, which has established a general model, and are also endorsed by the [P-20 Council's TLE Committee](#), [ILSTOY/NNSTOY](#), and the [Center for Teacher Quality](#), among others. Career pathways that enable teacher leadership are key to ensuring the greatest number of students benefit from the expertise of our best teachers.

Collection and Dissemination of Title II Spending and Effectiveness Data

Finally, as we researched current uses of Title II funding across the state, we found that many school and district administrators were unable to note specifically how those funds were spent. One regional administrator involved in the application process told us she had seen a district submit the example form--without changing the name of the district--and still receive funding. It appears to us that the greatest roadblock is a lack of manpower to screen these applications. We find this lack of oversight troubling, as these funds are earmarked for the specific purpose of improving teacher quality.

We recommend that state-level funds be set aside to ensure adequate resources to create a more meaningful and effective system for districts that receive Title II funding. This should not be intended to punish or "catch" districts, but to learn how funds are actually being used, ensure districts have involved teachers in the process, and highlight best practices. Furthermore, we advocate for the collection of long-term data in order to gain insights into the manner in which districts spend Title II funds, the problems being addressed through those interventions, and the effectiveness of these solutions. Over time, this data will allow ISBE to provide districts with a list of recommended best practices proven to show results, streamlining the approval process and ensuring that districts have meaningful information on which to base their decisions.

If ISBE provides guidance for districts to conduct teacher-led, differentiated professional learning and to implement career pathways for teachers, we are confident that districts will be better equipped to make these needed changes. Empowering teachers to identify and meet their own professional learning needs, and to take on leadership and mentoring roles while remaining in the classroom, will ensure that they can respond effectively to the individual needs of the students in their schools. In addition, collecting information about the effectiveness of Title II interventions will, over time, enable ISBE to provide research-backed guidance on best practices to meet the needs districts identify in their schools. Taking these steps at the state level today will lay the groundwork that will help Illinois schools adopt best practices to prepare students for a rapidly changing world.

Respectfully submitted,

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The Center for Success in High-Need Schools

..... a P-20 Statewide Collaboration

ESSA Recommendations for the Illinois Plan

The Center Partnership, a statewide teacher and leader preparation collaboration of the small independent colleges, suggests the following recommendations for implementation of ESSA in Illinois.

1. Create a culture that embraces and promotes the profession of teachers, leadership and scholarship in education as well as teacher and leader preparation. Develop positive messages about becoming a teacher in Illinois that is state-wide and reaches out to Illinois residents who prepare to teach outside of Illinois, too. The messages should be attractive to a diverse spectrum of people and attract males, racially and ethnically diverse candidates as well as candidates diverse by age. Increase the pool of teacher candidates by focusing on candidate outcomes rather than credentials with which candidates enter college. Review and revise the TAP cut scores.
2. Use Title II funds for teacher prep programs to follow their grads into their first jobs. Establish a seamless transition from pre-service to in-service by having higher education clinical / student teaching faculty follow their candidates into their first position. Clinical faculty would mentor the candidates, help them network, develop an individualized PD plan with them in conjunction with their principal/ department chair/ school mentor and provide initial professional development to accomplish the individual as well as school/district PD plans and goals. Mentoring could be in person and online and could be in collaboration with school district mentors (i.e., teacher leaders).
3. Use Title II funds to support district programs to identify and develop teacher leader roles within every school with support from IHEs and other formally-prepared teacher leaders. District implementation plans would be designed to fill a specific percentage of teacher leader positions with formally prepared (endorsed) teacher leaders or teachers with new principal endorsements that provide them with the skills as outlined in the Model Teacher Leadership Standards. The Model Teacher Leader Standards have been supported by governmental and national professional organizations, including NEA. This Teacher Leader Network would not only create career ladders within schools and districts, but also would promote networks across districts to support teacher leader goals and share successful programs. As summarized by the National Comprehensive Center for Teacher Quality (October, 2007), teacher leader roles support school outcomes through seven essential practices: (a) improve teacher quality, (b) improve student learning, (c) lead reform implementation efforts, (d) recruit, retain, motivate, and reward accomplished teachers, (d) provide opportunities for further professional growth, (e) extend the principal's leadership capacity, and (f) create a more democratic school climate, which supports teachers and students. In the Illinois School Board Journal article, Coming Up Short Finding Good Teachers, McCaw and Mummert (2009) McCaw

reported that because 1 to as many as 3 in every 5 new Illinois teachers leave the profession in the first year, school districts, especially those with geographic or specific content area needs, will continue to face teacher shortages even with reductions in the number of teaching positions. McCaw and Mummert proposed a 9-point solution to retaining teachers in Illinois districts. Five of these points were directly related to the need for more endorsed teacher leaders in our schools at every building level because teacher leaders know how to: (a) respond to rapid changes in school reform, (b) help recruit a diverse and high quality teacher pool, (c) sustain professional development and retention, (d) focus teachers into areas of high need, and (e) provide support for high quality new teacher mentoring programs. Teacher leader programs prepare teacher leaders to be role models as well as collaborative advisors and instructional coaches. School districts need these teacher leaders to serve as mentors, instructional coaches, leadership team members, and professional developers/implementers. Supporting district-based plans for growing the cadre of teacher leaders is needed in every school, but especially in high needs schools, which are likely to have more teachers who are the least experienced and with the least formal preparation.

4. Identify the steps that follow achieving the Teacher Leader endorsement. Identify specific roles that require a teacher leader endorsement. For example, you must have a Teacher Leader endorsement to be an instructional coach or a curriculum facilitator. This would create next steps on the career ladder for the teacher leader. Taking this action keeps in mind the history and research of the teacher leader endorsement that grounded the program ---- the idea that the TL endorsement was the beginning of a career ladder that teachers who wanted to stay in the classroom could pursue. As we continue to see teacher retention surface as a critical problem, completing the steps on the teacher leader career ladder could aide job satisfaction for teachers who want to advance their careers, but who also want stay in the classroom. Having satisfied teachers stay in the classroom longer increases student growth.
5. Form a task force on professional development to propose a redesign to the current re-licensure system. The re-design should reflect a valuing and recognition of multiple forms of teacher professional development, both PD completed within the district/school and outside of it in professional organizations, non-profit educational groups, and advanced degree work.

For example, using Guskey's (2000) work on models of professional development in schools would suggest that PD should be first and foremost well-defined and part of a larger PD plan rather than an accumulation of "activities." Guskey argued for four principles of effective PD: (a) PD focuses on teacher and student learning, (b) PD emphasizes individual and organizational change, (c) A PD activity is one component of a larger PD goal, and (d) be on-going, job-embedded. Moreover, Guskey suggested that PD could include training models (e.g., workshops, micro-credentialing), peer observation models (e.g., coaching, lesson study), school improvement models (e.g., PLCs), study groups (e.g., Edcamps), action research, mentoring, and individually-guided PD (e.g., graduate coursework).

Rigor and accountability should be part of the revised requirements and guidelines for providing PD. Once the providers are established as highly reputable and effective, then the CPDUs, micro-

credentials, or credit hours earned will need to be allocated in a systematic manner. Title II funds should be used to incentivize new PD models that strengthen the profession.

6. Use Title II funds to establish support programs for diverse students who want to teach. Research shows that we lose diverse candidates at each transition point in the education/ teacher pipeline. Support programs should be established to create a net of support at each transition point to help students become viable candidates in education: transition to high school, transition to college, transition to college/school of education, transition to career, and retention during the first four years of teaching.

Scholarships could provide incentives at each transition point and be banked and only used if the student chooses teacher preparation as a path in college. Partnerships between school districts and IHEs would support this work.

Title II funds could also be used to provide vouchers for the edTPA for diverse candidates and / or candidates with great need.

7. Use Title II funds braided with other state grants or gifts for Teacher Prep organizations to conduct summer internships in collaboration with high-need communities or working with students from high-need communities to build multi-cultural understanding and attract the best candidates to schools that need them most. Increase loan forgiveness for teachers who complete internships with students from high-need communities and who then go to teach in high-need schools. Teacher candidates might also be connected to mentor families who help them understand life in their communities.

8. Provide incentives (job sharing opportunities, tax relief, networking and leadership opportunities) for teachers in shortage areas who are retired to come back and teach, and provide incentives for those who left the profession and now wish to rejoin to activate their credentials and teach in high-need schools. Provide incentives for principals and teacher leaders who complete the new endorsements and choose to practice in a high-needs school, also.

9. Build on the recent successful redesigns and reform initiatives in teacher preparation programs and use Title II funds to offer a competitive grant program where EPP's and LEA's collaborate to provide a community-based extended-time clinically-focused teacher preparation program that includes:

- Targeted recruitment and selection that is both rigorous and flexible
- Co-teaching
- Elbow coaching with strategic just in time learning opportunities
- EPP staffing and leadership
- Preparation for key teacher leader positions
- Post support and networking in first position

And that has central office, union and school board support and a progressive school leadership team that agrees to use and support:

- Collaborative planning and reflection time
- Credentialed teacher leaders for cooperating teachers and mentor teachers
- Shared decision-making
- Induction and mentoring
- Teacher leader mentoring
- Principal and assistant principal mentoring

And that provides teacher choice in developing an individualized and meaningful PD plan for professional growth.

ESSA State Plan: Midwest PBIS Network Recommendations for Illinois Letter of Support

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

Dear Dr. Smith:

I appreciate the opportunity to provide input in developing Illinois's ESSA Plan Draft #2. Positive Behavior Interventions and Support (PBIS) has been a top goal at Special Education Services for the past 14 + years. I am pleased to see ESSA's emphasis on using a multi-tiered system of support to establish a positive school climate and culture. I also believe that Illinois's focus on the whole child is critical as we have seen the positive impact school climate and culture has made on our student's academic and social emotional success.

Since beginning implementation in 2002 we have seen significant gains in several areas of our programs. Specifically, we have seen evidence of a more positive school community in each of our schools. Implementing PBIS has enhanced our ability to provide our students with learning that promotes engagement. Our classrooms are well-structured, instructional, safe (e.g. emotionally and physically safe), and responsive to student needs.

Implementation of PBIS within our schools has also had a positive impact on our behavioral and academic outcomes. Organizationally, we have seen a decrease in the need for intervention room services and an increase in the overall amount of time our students are engaged in the learning environment.

The quarterly Coaches Network Meetings and continued trainings provided by the Midwest PBIS Network, on topics such as developing systems and using data to support a MTSS, Restorative practices, and various evidence based practices (e.g. Check-In/Check-Out/FBA/BIPS, Wraparound, RENEW); have also been very beneficial to our programs and professional development initiatives.

ESSA emphasizes the use of a multi-tiered system of supports framework to establish positive climate and culture. **Therefore I request that Illinois's plan includes the following:**

- 1) Ensure all schools have access to adequate technical assistance aligned to National PBIS TA Center research to implement and sustain behavioral supports within a multi-tiered framework
- 2) Utilize multiple measures for school climate within the Accountability System as the School Quality Indicator
- 3) ISBE/IL-EMPOWER partner with the Midwest PBIS Network to develop both State and LEA capacity for implementation of the following district and school supports recommended in section 5.1 (p. 62) of the Illinois ESSA Plan:
 - Trauma-Informed Environments
 - Positive Behavior Interventions and Supports (PBIS)
 - Classroom Management
 - Anti-Bullying Programming
 - Restorative Practices

- Functional Behavioral Assessment - Behavior Intervention Plans (FBA-BIP)
- Check-In, Check-Out (CICO)
- Family Engagement
- Education Environment Practices
- Person-centered Planning Practices (wraparound, Care Coordination, etc.)
- School-Community Partnerships

Sincerely,

Tgichona G. Martin, Ph.D.
Director of Behavioral Services
Special Education Services
The Menta Group

The Evolution of Evaluation

A Way Forward for Teachers, by Teachers

Let's reimagine teacher evaluations as an equitable tool that promotes collaboration and growth for teachers.



Our Mission:

The Educators for Excellence Chicago Teacher Evaluation Policy Team aims to increase the amount and quality of feedback, support and opportunities for professional growth within the REACH evaluation system. By collaborating with administrators, district officials, and other stakeholders, we aim to implement solutions that effectively create teacher-led, non-evaluative opportunities for peer coaching and mentoring. We aim to do this by developing a comprehensive distributed leadership model for Chicago Public Schools.

What is Distributed Leadership?

- Evidence-based practice
- Responsibilities are shared amongst experts rather than living solely with one leader
- Has the power to build capacity for change and improvement based on expertise, mutual trust and transparency

Teachers are significantly more likely to stay at their school if¹:

They have influence over decision-making

They are engaged in a culture of innovation

They are collectively responsible for school outcomes

Why Pursue Distributed Leadership?

With our current model, most leadership responsibilities fall solely on the school's administrative staff. We recommend a model that leverages the incredible talent, expertise and skillsets of teachers as leaders in the district, fostering collaboration that will improve student outcomes.

- On average, principals manage up to 50 employees, which is 45 more employees compared to other skilled professionals and nearly 35 more employees than unskilled professionals²
- In Chicago, we lose up to 20 percent of our principals³ and teaching staff¹ each year
- Only 3 in 10 educators demonstrate significant improvement² on principal-driven evaluation processes, as principals often do not have the time or resources to coach and support their staff members

96 percent of educators agree that leadership is an essential ingredient in creating exceptional schools²

Principals spend on average 6 hours per teacher to complete REACH – leaving little to no time for coaching

The Impact for Chicago Public Schools

Some of the most successful schools in CPS utilize distributed leadership practices and evidence from around the world shows that this is one of the most effective ways to promote student achievement and staff satisfaction.

- At Hawthorne Elementary School, distributive leadership practices have contributed to significant reading and math gains despite a rising poverty index⁴
- For Denver Public Schools, utilizing teacher leadership has resulted in increasing overall teacher satisfaction and retention²
- Schools in Tennessee that have piloted a distributed leadership model known as the Shanghai Model have seen the highest student growth in the district⁵
- School administrators, consultants and external professional development providers can cost schools hundreds of thousands of dollars. Utilizing the existing talent in the building and shifting priorities can be a creative way to cut costs, particularly in schools or districts with limited funding⁶



THE EVOLUTION OF EVALUATION

Teacher Growth: Leverage REACH to promote teacher growth through collaboration

Our Proposal

Train principals to set priorities and create schedules that allow for peer collaboration

At the start of the 2017-2018 school year all principals will have received best practice scheduling training, making peer collaboration a priority in every school and setting a foundation for a distributed leadership model across the district.



Educators for Excellence Teachers will Research and Create a Distributed Leadership Model

Throughout the Winter and Spring of 2017, using the 5 Principles outlined by Bain & Company (Determine a Leadership Model, Create and Strengthen Leadership Capacity, Focus Leaders on Improving Teaching and Learning, Create Teams with a Shared Mission, and Empower Leaders with the Time and Authority to Lead) Educators for Excellence teachers in collaboration with partners and the district will create and propose a pilot distributed leadership model to the district.



Begin Piloting and Collecting Results

Within the 2017-2018 school year, the distributed leadership pilot will begin in 1-5 schools. Results will be collected and the model refined.



Refine Model and Expand Pilot

By the 2018-2019 school year, the distributed leadership pilot will begin in 10-20 schools. Within the 2019-2020 school year, the pilot will expand to an additional 10-20 schools. At the end of the 2020 school year, the results from the pilots will be assessed and determine how the work should move forward.

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