

April 16, 2026

Patrick Rooney  
Director of School Support and Accountability Programs  
Office of Elementary and Secondary Education  
400 Maryland Ave., SW  
Washington, DC 20202

Dear Mr. Rooney,

This letter serves as Illinois' official request to amend the Illinois Every Student Succeeds Act State Plan in order to redesign its school accountability system. The proposed changes address identified problems of practice and aim to ensure that accountability information supports continuous school improvement for all schools, regardless of designation.

### Substantive Changes to the Accountability System

The proposed amendment **replaces the current accountability framework with a Profile of Performance model**. This redesigned system moves away from norm-referenced comparisons and ranking to instead apply clear, criterion-based expectations to describe patterns of school performance. Under the proposed model, every school continues to receive an annual designation, but designations are intended to communicate a school's starting point for improvement rather than its relative rank among schools. The system is designed to provide clearer signals about performance, better differentiate areas of strength and need, and support schools in setting and prioritizing improvement goals.

Consistent with ESSA requirements, the redesigned accountability system uses multiple statewide indicators. The proposal streamlines and aligns indicators across grade spans, including redesigned composite indicators for academic proficiency and academic growth; continues use of the existing English Learner Progress, graduation rate, and climate survey indicators; and transforms chronic absenteeism into consistent attendance. Indicator thresholds were developed through a structured, data-informed process that examined statewide performance distributions, prior policy anchors, student-level modeling results, and stakeholder feedback to ensure meaningful differentiation.

The Profile of Performance model distinguishes between core indicators, which define a school's foundational performance pattern, and elevating indicators, which may strengthen but not lower a school's designation. This structure is intended to retain multiple measures of performance while ensuring that accountability results clearly indicate where focused improvement is needed. The model also preserves incentives for growth and progress over time and supports schools in identifying strategic areas for action rather than responding to a single composite score.

A school's final profile of performance is determined by considering (1) core performance, (2) elevating indicators, and (3) the performance of individual student groups.

1. Core performance is broadly determined by a school's strongest core indicator.
  - For high schools, core performance is considered Exemplary only when there is:
    - Exemplary proficiency or growth; or
    - Exemplary graduation rate paired with Approaching Exemplary proficiency or growth.

All other core performance levels are determined by the single strongest core indicator.

- However, if any core indicator is Comprehensive, core performance is set one level below the strongest core indicator.
  - Additionally, if the "All Students" group falls in the Automatic Comprehensive range on any core indicator, the school's overall profile is Comprehensive, *regardless of performance on elevating indicators or student group results*.
2. Next, performance on elevating indicators is factored into the profile.
    - If core performance is Exemplary, the school proceeds directly to consideration of student group performance. (For student groups, the process ends here.)
    - If core performance is Approaching Exemplary or Commendable, the school or group may be elevated one level with two Exemplary elevating indicators.
    - If core performance is Developing or Comprehensive, the school or group may be elevated one level with one Exemplary and one Approaching Exemplary elevating indicator, *except as noted under core performance*.
  3. Last, if a school has one or more student groups with a Comprehensive profile of performance, the school's profile can be no higher than Commendable.

Schools with an overall profile of performance of Comprehensive will be identified for Comprehensive Support and Improvement status, and schools where one or more student groups have a Comprehensive profile of performance will be identified for Targeted Support and Improvement status. Schools will have one planning year and three implementation years before needing to either meet state exit criteria or be escalated to a more rigorous level of support.

## Non-Substantive Changes

Finally, as is standard practice, the Illinois State Board of Education (ISBE) has also made a number of other non-substantive edits to its plan to reflect current practice. Non-substantive edits include grammatical or stylistic revisions that do not represent programmatic changes, as well as programmatic updates that do not require prior approval from the U.S. Department of Education.

## Stakeholder Engagement and Consultation with the Governor

The accountability redesign was developed through a phased, interrelated process of statutory consultation, public engagement, modeling analysis, and formal public comment extending from September 2024 through March 2026. ISBE engaged both required statutory advisory bodies and a broad range of field stakeholders throughout all phases of development.

### Phase I: Model Type and Desired System Features and Outcomes (September 2024–May 2025)

ISBE began socializing potential redesign concepts with key stakeholder groups in fall 2024 via their established annual conferences. Then, in early 2025, ISBE conducted an in-person statewide Listening Tour across nine locations representing geographic diversity, including Chicago Heights, Champaign, Spring Valley, Vandalia, Carterville, East Moline, Peoria, Joliet, and Chicago Public Schools. During Phase I, ISBE presented three potential accountability approaches: a decision tree model, a profile of performance model, and a simplified index model. Feedback indicated strong preference (92%) for approaches that did not produce a single numeric score capable of ranking schools. Respondents emphasized that the system should:

- Be easy to understand and explain
- Be strengths-based in orientation
- Retain growth as a core indicator
- Reconsider the role of state-selected indicators

This input directly informed ISBE’s decision to pursue a profile of performance model.

### Phase II: Initial Redesign and Extended Public Comment (Oct. 28, 2025–Jan. 7, 2026)

On Oct. 28, 2025, ISBE released a public presentation describing the proposed accountability redesign and opened a 72-day public comment period. Comments were solicited via online survey, direct email to [essa@isbe.net](mailto:essa@isbe.net), and through targeted outreach to stakeholder organizations. Throughout November and December 2025, in-person Listening Tour events were held in Huntley, Bloomington, O’Fallon, and Chicago along with multiple statewide virtual forums, including one specifically for stakeholder organizations.

Feedback during this phase focused primarily on:

- Concerns regarding designation names
- Perceived imbalance between K-8 and high school performance distribution patterns
- The removal of 9<sup>th</sup> Grade on Track and College and Career Readiness indicators
- The broader role of student group performance on the overall designation

In response to stakeholder concerns, ISBE extended and expanded the planned timeline, which ended public comment on Dec. 5, 2025, and had ISBE proceeding directly to a draft for Board discussion in December 2025 and approval in January 2026. The revised timeline extended the open comment period to Jan. 7, 2026, and added five virtual engagement opportunities. It also

introduced a new Phase (Phase III) in the process to allow time for stakeholders to react to a draft amendment that incorporated their feedback.

### Phase III: System Revisions and Formal Redline Amendment (Jan. 12–Feb. 25, 2026)

On Jan. 12, 2026, ISBE released the first formal redline draft of the ESSA amendment incorporating revisions based on Phase II feedback and opened a 45-day public comment period. Reflected in this first draft were changes to the accountability design that:

- Revised designation names to better reflect intended meaning
- Made targeted adjustments to indicator performance thresholds to improve alignment between grade bands
- Added a core performance requirement for high school Exemplary profiles
- Modified elevation rules to require two Exemplary elevating indicators to elevate into the two strongest profiles (i.e., Exemplary and Approaching Exemplary)

Additionally, ISBE provided a full data set modeling the impact of the proposed system on every school's designation using school year 2024-25 data, including the impact on accountable student group profiles.

Feedback during this period reflected increasingly divergent perspectives on individual student groups, with some wanting to expand the influence student group performance has on a school's overall designation and others wanting to limit said influence. ISBE conducted exploratory analyses of proposals in both directions. Research did not support increasing the number of students necessary to be considered an accountable student group, while modeling proposals to expand subgroup influence determined that such changes would both disadvantage schools serving diverse learners and decrease alignment between grade bands.

Finally, the Illinois Balanced Accountability Measures Committee identified several outlier cases in the modeled dataset and raised questions about ways in which the system could or should be modified to address these outliers.

### Phase IV: Technical Refinement and Final Draft (March 3–April 3, 2026)

A final redline amendment was released March 3, 2026, for a 30-day public comment period, accompanied by an additional virtual public engagement session. Revisions in the final draft were limited and largely technical in nature, making modest adjustments to processing rules for schools without assessed grades (e.g., K-1 and K-2 schools) and refining high school core performance logic. The draft was presented and discussed by the Board of Education during the 30 day public comment period, and approved after the 30-day public comment period ended.

A more thorough analysis of public comment themes and ISBE's response is included as an attachment along with an executive summary, redline copy of the plan, clean copy of the plan, and amendment change log.

### Consultation with the Governor

Consistent with Section 8540 of the Elementary and Secondary Education Act, ISBE consulted in a timely and meaningful manner with the Governor's Office throughout development of the amendment.

ISBE staff met regularly with the Governor's Office during plan development and provided formal progress briefings on Oct. 9, 2025; Jan. 28, 2026; and Feb. 27, 2026.

If you have any questions about this amendment, or its impact on school summative designations, please contact Rae Clementz, Executive Director of Data, Accountability and Assessment, at 217-524-4614 or email [essa@isbe.net](mailto:essa@isbe.net).

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Sanders', written in a cursive style.

Dr. Tony Sanders  
State Superintendent of Education  
Illinois State Board of Education