

ESSA COMMENTS 12.18 – 12.28

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1130 of the following message:

Dear Illinois State Board of Education,

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

I was fortunate to raise my children in Oak Park, where arts are valued and included in the curriculum. Today one of my children teaches the arts in a Chicago elementary school, passing along this gift. We must assure that this vital area of learning is not overlooked in the school quality indicators.

The arts are a core subject in Illinois and are unique and effective in their approach to student learning. Through the arts, students learn to think critically, solve problems creatively, and work collaboratively. Extensive research shows that arts education improves student outcomes, increases teacher satisfaction, and proves particularly effective in helping close the achievement gap.

Based on this research and diverse stakeholder support, the Illinois P-20 Council has already recommended that Illinois' ESSA State Plan include the arts as a distinct indicator of school quality. The Council has also put forward specific, practical measurement options. In addition, other states have shown that an arts indicator presents a well-rounded definition of school quality.

Illinois' current draft plan, however, does not include an arts indicator. The plan refers only to a work group that will "consider" a broader curriculum indicator, vague and undefined, for "possible inclusion in the future."

I urge you to adopt a Plan that will most effectively ensure a quality education for all K–12 students in Illinois. Include the arts as a distinct indicator of school quality in the final Illinois ESSA State Plan.

Thank you for the opportunity to provide input on this important issue.

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

First Name: Deborah

Last Name: Ryder

Email: Djryder@cps.edu

Comments: The arts are essential to a well rounded education. Keep visual art, music, drama and dance in our public schools

Thank you.

Dear Illinois State Board of Education,

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

The arts are a core subject in Illinois and are unique and effective in their approach to student learning. Through the arts, students learn to think critically, solve problems creatively, and work collaboratively. Extensive research shows that arts education improves student outcomes, increases teacher satisfaction, and proves particularly effective in helping close the achievement gap.

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Thank you for the opportunity to provide input on this important issue.

Sincerely,
Deb Hand

Dear Illinois State Board of Education,

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

The arts are a core subject in Illinois and are unique and effective in their approach to student learning. Through the arts, students learn to think critically, solve problems creatively, and work collaboratively. Often times, I am told by special education teachers that their students experience the most success in their school day during art class. The curriculum is accessible for ALL students including English language learners immigrating from foreign countries. ELA Common Core State Standards are routinely practiced and met by students interpreting works of art with observational evidence to support claims. The 6 traits of writing are routinely practiced through student artist statements. Math standards are routinely practiced and met by students making measurements, applying concepts of proportion, ratios, and fractions. Science and engineering standards are met through material investigations and dialogue. Art teachers offer all other content area teachers an opportunity to collaborate and use aesthetics to communicate ideas and create meaningful and engaging work. Extensive research shows that arts education improves student outcomes, increases teacher satisfaction, and proves particularly effective in helping close the achievement gap.

ARTS

Based on this research and diverse stakeholder support, the Illinois P-20 Council has already recommended that Illinois' ESSA State Plan include the arts as a distinct indicator of school quality. The Council has also put forward specific, practical measurement options. In addition, other states have shown that an arts indicator presents a well-rounded definition of school quality.

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Thank you for the opportunity to provide input on this important issue.

Sincerely,

David Barista
Fine Arts Teacher
Heritage Middle School
Summit, Illinois

Dear Illinois State Board of Education,

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

An arts education is vital to everybody. Research shows that an appreciation for the arts boosts a wide range of cognitive skills, including critical thinking, problem-solving, and cooperation. It enhances our ability to process information and to generate new ideas. It enriches our health, well-being, and quality of life. Every child should have the opportunity to cultivate this appreciation for the arts.

Schools that devote time and attention to comprehensive arts education produce better student outcomes and more satisfied teachers. And yet we know that when schools are struggling financially, as so many in Illinois unconscionably are, arts programs are often first on the chopping block. This not only harms millions of students, it also exacerbates the achievement gap that entrenches vicious cycles of poverty and racial segregation.

With the Illinois ESSA State Plan, we have an opportunity to declare that the arts are not a luxury, but a common good that belongs to us all. To ensure that an arts education is not a bonus for a privileged few, but the right of all children and all citizens.

I urge you to adopt a plan that will most effectively ensure a quality education for all K–12 students in Illinois. Include the arts as a distinct indicator of school quality in the final Illinois ESSA State Plan.

Thank you for your time and attention.

Sincerely,
Andrew Daglas

Chicago, IL

Dear Illinois State Board of Education,

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

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With the Illinois ESSA State Plan, we have an opportunity to declare that the arts are not a luxury, but a common good that belongs to us all. To ensure that an arts education is not a bonus for a privileged few, but the right of all children and all citizens.

I urge you to adopt a plan that will most effectively ensure a quality education for all K–12 students in Illinois. Include the arts as a distinct indicator of school quality in the final Illinois ESSA State Plan.

Thank you for your time and attention.

Sincerely,
Andrew Daglas
Chicago, IL

To the members of the Board of Education

I am writing to urge you to include the arts as a distinct indicator of K–12 school quality in the final ESSA State Plan for Illinois.

There is an impressive body of research that indicates the arts are an important indicator of school quality.

For example robust high arts program improve graduation rates and overall school performance for students in the lower quartile of socio-economic status

Catterall, J. S. (1998). *Involvement in the arts and success in secondary school*. (Monograph V.1 No. 9.). Washington, D.C.: Americans for the Arts.

Allowing children to visualize, act, and perform meaning through their bodies powerfully enhances the development of language ability. The arts give children something to say, and good teachers seize that education opportunity to build language skills:

Egan, K. (2006). *Teaching literacy: Engaging the imagination of new readers and writers*. Thousand Oaks, CA: Corwin Press.

Flood, J., Heath, S. B., & Lapp, D. (2008). *Handbook of research on teaching literacy through the communicative and visual arts*, (Vol. 2). New York, NY: Routledge.

Olshansky, B. (2008). *The power of pictures: Creating pathways to literacy through art*. San Francisco, CA: Jossey-Bass.

Some of the most powerful examples of the power of the arts to improve academic performance come out of Chicago.

Burnaford, G., April, A., & Weiss, C. (2001). *Renaissance in the classroom: Arts integration and meaningful learning*. Mahwah, New Jersey: Lawrence Erlbaum.

Furthermore, there are strong research sound methods for assessing quality of arts education programs, so that educational responsibility can be maintained

Seidel, S., Tishman, S., Winner, E., Hetland, L., & Palmer, P. (2009). *The qualities of quality: Understanding excellence in arts education*. Cambridge, MA: Project Zero, Harvard Graduate School of Education.

Illinois is a leader in having teachers who are prepared to teach the arts in educationally significant ways. This work is being done, but not all children have access to quality arts instruction. Illinois merely needs to recognize the exceptional practice already being demonstrated across the state and use this as an exemplar for the quality education all students deserve.

Richard Siegesmund
521 College Terrace
DeKalb, IL 60115
richard.siegesmund@gmail.com

99 of the following message:

Dear Dr. Smith,

I am writing as a concerned community member who cares about supporting all students and closing the academic achievement gap. Your draft ESSA plan misses a critical opportunity to highlight these goals. As you work to improve the plan, please keep these priorities in mind:

--Growth matters more than proficiency. We should measure how much our children learn in school, not how much they knew before they started.

--Students from historically underserved subgroups should count. Overall ratings need to take into account that all students matter. With one of the largest academic achievement gaps in the country, we cannot afford a system that turns a blind eye to this.

--Rating labels should make sense to parents. Families deserve understandable, user-friendly information about how their children's schools are doing.

--Getting this done right is more important than getting it done fast. The state can submit a plan in April or September. If we don't get it right by April, we need to keep working until we do.

Thank you.

Sincerely,

Leann Szydlo

Hello,

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

First Name: Michael

Last Name: Oberhaus

Email: mike.oberhaus@rimsd41.org

Comments: ESSA Draft #3 Notes & Feedback:

- Draft #3 timeline does not show anything for accepting feedback before taking draft #4 to ISBE board for approval March 15th
- Title VII – is this a new grant source? (McKinney-Vento Homeless Assistance Act)
- State sets targets at 90% in all areas by 2032
- State sets interim measures at 5 to 6 years; need 3 consecutive years for baseline
- Graduation is noted in 4, 5, and 6 year cohorts
- EL Proficiency on ACCESS:
- Expected to attain ELP within 5 years

MISCELLANEOUS

- ISBE will receive recommendations for cut scores in June 2017
- TRS – can anything about the proposed TRS rate be discussed?
- Continuous Improvement (page 26):
- Relatively consistent with what has occurred with Title grant review and approval
- Differentiated Technical Assistance (page 28):
- IL-EMPOWER – what will this replace (CSI, ROE, SIG, etc.?)
- List will be provided so schools and districts can choose their provider
- Those who participate must conduct a needs assessment
- Schools identified for “comprehensive supports” will be required to participate in IL-EMPOWER
- This must replace priority and focus status? YES (page 49)
- Translation: ISBE will work to translate any world language spoken by more than 60% of English Learners in the state. Funding is what prohibits this progress.
- 9th Grade On-Track (HS): “The On-Track indicator identifies students as on- track if they earn at least five full-year course credits and no more than one semester F in a core course in their first year of high school.”
- College and Career Ready Indicator (HS): not yet decided
- Climate Survey – 5Essentials currently does not meet the requirement so we anticipate the state either adjusting the 5Essentials to be able to report out by demographic; or creating a new suite of surveys
- How will our satisfaction survey compare?
- Subgroups added:
- Former English Learners
- Students formerly with disabilities
- Group size of 30 – not 20 now in reporting subgroup data
- When disaggregation is required, privacy of individual students for each accountability purpose would be 20. (??)
- Discussion about weighting certain measures more than others (i.e. graduation because of not student growth rating at the high school)
- ISBE recommending growth and proficiency have the same weight
- 5 Summative Rating for schools as follows:
- Mastering (within top 15%)
- Mentoring (within 30 %)
- Meeting (within 70%)
- Leading (within 85%)
- Learning (15% and below)
- Exit criteria are established.
- Targeted Support: we wonder what the specifics are on “Former English Learner” and “formerly with disabilities” means
- Teacher Residency – we wonder what this entails
- Overall concerns about IL-EMPOWER
- How does Illinois Data FIRST & Ed360 compare to Educlimber? (page 68)
- Professional Development through Illinois Virtual School – how does this compare to Ed Leaders Network? (page 68)
- HR area: page 69
- Educator Equity – levels of teacher effectiveness, rates and differences in rates
- ISBE is requesting an extension to figure out this section
- Student discipline focus area – page 73
- Use of Title IV, A and F for statewide strategies on exclusionary discipline, behavioral health

awareness, improve outcomes of those living in distressed communities

- Career Pathways – how does the Education for Employment Regional Delivery System compare to Career Cruising? (page 74)
- HR: parents will be informed of their right to know the level of professional development of their child's teacher (page 76)
- Nicole Berry – Preschool for All Expansion grant (she is aware of this)
- Title IV, A dollars – ISBE is considering using these funds for Illinois Virtual School possibilities for students (page 80) – How might this impact the Plato contract?
- ISBE will use 20% poverty as the initial threshold for school to be able to receive a schoolwide waiver (this changed from 40% previously)
- EL – pages 93 & 94:
- ISBE is reviewing the definition of EL proficiency. We have told La'Shanta to review this document and suggested to offer to be a part of the review committee
- 21st Century Community Learning Centers – 2% can be used for administration – it states 5% elsewhere in other programs
- Homeless – pages 96-105
- Homeless education liaison will be responsible for annual trainings for district and program staff on the needs of runaway and homeless youth.
- Need to communicate with athletic directors on the information from page 103
- Extra-curriculars and residency requirements
- "enroll" definition
- etc.

Thank you.

Hello,

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

First Name: Rachel

Last Name: Pitt

Email: rachelmeg.pitt@gmail.com

Comments: In 5.1, section B it states "Barriers to learning and teaching, such as inadequate access to the general education curriculum, poverty, trauma, homelessness or instability in a living situation, disengagement, absenteeism, bullying, behavioral health issues, lack of or insufficient number of behavioral health supports in the school environment (counselors or social workers), must be addressed." When examples of behavioral health supports are given, school psychologists are conspicuously absent. School psychologists provide important behavioral health supports to students in schools. They are qualified to provide mental and behavioral health supports to students and work side by side with counselors and social workers. School psychologists should be added to the examples in parenthesis. Thank you.

Thank you.

Hello,

I am confused why seal of biliteracy is not a career indicator in draft 3 of ESSA. Indeed.com shows 3,390 'bilingual' jobs in the Chicago area alone. 51 Of those available jobs are in U-46 alone. Every year we have recruit bilingual staff from out of state and even out of country. Translators and Interpreters are expected to rise 29% <https://www.bls.gov/ooh/media-and-communication/interpreters-and-translators.htm> The need for a biliterate workforce is already here and rising.

90% attendance is listed as a "positive" career indicator. 90% of 170 days is 17 days absent. Every 5-10 days absent generally results in a course failure from my local research and published works. <http://consortium.uchicago.edu/sites/default/files/publications/07%20What%20Matters%20Final.pdf> The state average attendance is already 94% (illinoisreportcard.com). Why have lower standards for high schools?

At the ESSA conference, it was said that there 'isn't enough research to support the seal of biliteracy in ESSA'. Job applications commonly ask if applicants are bilingual while none ask for attendance rates from high school. I would argue there is research against this low and arbitrary threshold for attendance and thousands of available jobs to support the seal of biliteracy as a valid career indicator.

I hope that ISBE reconsiders the seal of biliteracy and attendance measures as career indicators.

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#

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.

I wanted to share some experiences that my students and I have had with our librarian. Over the past few years, it has been my pleasure to have a trained librarian in my building. Her predecessors were not necessarily coming with a Masters in Library Science and what a difference it made. I had a flexible and helpful individual that helped round out lessons for my students in Science. We had conversations about what resources could be added to assist student learning. Several years ago I reached out for support in modeling citations for my students' performance pieces. I described an idea for a template, and she followed up with templates that covered a variety of media. These template went on to be shared district wide. As a 25 year veteran teacher, it was great being greeted each day and having rich conversations that made my curriculum really blossom for all my students. She also reached out when

we adopted the NGSS to insure that our library collection grew to support these new standards. I hope that as a state we continue to support and seek professionals that provide necessary resources and content to all of our students.

Thank you so much,
Christine L. Gear
8th Grade Science
Simmons Middle School
Science Curriculum Counsel

Dear Dr. Smith,

I am writing as a concerned community member who cares about supporting all students and closing the academic achievement gap. Your draft ESSA plan misses a critical opportunity to highlight these goals. As you work to improve the plan, please keep these priorities in mind:

--Growth matters more than proficiency. We should measure how much our children learn in school, not how much they knew before they started.

--Students from historically underserved subgroups should count. Overall ratings need to take into account that all students matter. With one of the largest academic achievement gaps in the country, we cannot afford a system that turns a blind eye to this.

--Rating labels should make sense to parents. Families deserve understandable, user-friendly information about how their children's schools are doing.

--Getting this done right is more important than getting it done fast. The state can submit a plan in April or September. If we don't get it right by April, we need to keep working until we do.

Thank you.

Sincerely,

Maureen Ellis

February 22, 2017

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

Superintendent Smith,

Advance Illinois would like to commend ISBE for their tireless work on the development of the ESSA plan for Illinois. We believe that it is vital for Illinois to have a fair, clear and supportive accountability system, one that offers assistance to schools and districts and lifts student learning and attainment. Drafting an extensive system for accountability, intervention and support, and proposals for teacher effectiveness, is a tremendous task.

The many listening tours, ISBE working group sessions, and P-20 Council meetings have provided stakeholders an opportunity to contribute their values—and their vision for success—for Illinois' students and schools. We are grateful for the opportunity to provide feedback alongside numerous other stakeholders throughout the state.

ISBE has developed its plan by including disparate opinions and research. We think this is crucial and will support the hard work of implementation that occurs in the months to come. Though the federal requirements around school accountability may shift, we believe that it is important for Illinois to articulate clearly its approach to accountability to support the progress of Illinois students.

We look forward to supporting the ongoing effort by ISBE and look forward to ongoing conversation about how the accountability system will be used to ensure schools get the support they need and students graduate ready for college, career and democratic citizenship.

Long-term and Interim goals/ Index for Indicators

ISBE's plan sets ambitious long-term goals for the state, calling for 90% of students to be prepared across a range of different metrics from 3rd grade through high school. We applaud these ambitious goals, but mapping all schools to the same goals will create a higher bar for some of our most disadvantaged schools because they will need to have their students' progress further to meet those goals.

And while we recognize ISBE's intent to create a non-punitive system and which means that failing to reach a goal may not have the same impact as in the past. However, to demonstrate how this system is supportive, we believe it is vital to clearly make the link between the indicators, status, and assistance.

In addition, the use of the goals to develop a scale for each indicator is unclear and we think may have unintended consequences if used as currently proposed.

Summative Ratings

ISBE has designed a unique system of ratings that allows districts to fall into categories based on high-quality performance on one or two metrics. This approach, not outlined in earlier plans, has had little opportunity for discussion and review. We would encourage ISBE to engage in further conversation with stakeholders and the community about how it would work in practice and its implications. As we note below, reviewing examples of how this might work would help stakeholders develop a deeper understanding of this approach.

Category Names

We appreciate ISBE's approach to category names that emphasize continuous improvement. We too value the need to acknowledge the complexity of the system without being punitive. However, we are not certain that the current categories for school rankings clearly communicate significant meaning to schools, communities, and parents, or if there is a communications strategy that will allow them to do so.

In addition, we believe that summative ratings really take on meaning when they are linked to a process for assistance. While a label should never lead to an action without bringing to bear significant additional information, it is often a starting point for further conversation. We would like to see additional detail for the initial actions that will be taken based on categories and then the ongoing process of data collection, types of assistance, and timelines that the accountability system will follow.

Subgroups

ESSA requires reporting of performance on the accountability metrics that is disaggregated by subgroup. This is a crucial opportunity to promote education equity by highlighting achievement gaps within schools. The current plan does not state how the performance of subgroups will be considered or included in a school's rating. We are concerned that this opportunity for focus on the gap and methods to close it will be lost. Advance Illinois made comments in the first draft regarding different approaches to use subgroup information. We reiterate those comments here and urge ISBE to reflect in the plan how it makes the education of traditionally under-served students a priority.

English Language Recommendations

ISBE opted not to adopt several recommendations from the Latino Policy Forum around English Learners. We agree with LPF's recommendations, and thus, we are troubled by the exclusion of their research-based recommendations for EL students. While we appreciate that not all recommendations can be adopted, we think the plan is particularly unclear about the approach to measuring ELP progress. Like the items above, we think this may need more discussion.

Simulation

Given the concerns about the metrics and ratings above, we believe simulating the plan is valuable. Without a simulation of the proposed new system, it is nearly impossible to spot unintended consequences, such as unfairly penalizing the neediest districts for factors beyond their control. Simulating the plan is an approach to allow the community to vet the plan as well. We would like to see

examples of school performance in order to understand the categories that schools fall into, and then the overall theory of action.

High School growth

The State Board noted the desire by many stakeholders for a growth metric in high school. The draft also notes the fact that without a new assessment, a valid and reliable use of growth may be unavailable. We continue to recommend that ISBE adopt the PSAT. This is not only because it allows for a growth metric, but also because it is highly likely that many of our schools, in particular those with resources, will adopt the PSAT, while others will not be able to, creating a system of haves and have-nots for a tool that can support college readiness.

Other Recommendations

We value the recommendations from the Teacher Leader Effectiveness and College and Career Readiness Subcommittee of the P-20 Council and request you to reconsider the following:

- We recommend using the definition of an “ineffective teacher” in the first draft:

“A teacher who has received an ‘unsatisfactory’ rating in his/her most recent performance evaluation rating or a teacher who has received a ‘needs improvement’ on an evaluation and in a subsequent evaluation has received an ‘unsatisfactory’ or “needs improvement.”

The definition in the third draft, requires a teacher to be rated ‘needs improvement’ *before* being rated ‘unsatisfactory’ to qualify as ‘ineffective.’

- The draft plan does not commit to move forward pilot programs that would utilize Title II set-aside funding to support an educator residency program, teacher leadership pathways, and training that could impact certification. We would like to see more of a commitment to both initiatives.
- We continue to believe the state needs a plan for teacher diversity. In the past, the P-20 Council has made recommendations about how this issue might be addressed through strategies in preparation, hiring, and retention. These proposals have often lacked funds and we continue to believe that Title II may be an opportunity to fund this type of initiative.
- We hope that ISBE will collaborate with the Higher Education system on the definition of college and career readiness, as recommended by the College and Career Readiness committee of the P-20 Council. Illinois needs a system that ensures students who are deemed prepared by high schools are equally considered “ready” by colleges and universities. This is fair to students.
- The plan does not commit to the use of a K-2 indicator. While we believe that ISBE would like to develop this metric – we would prefer to see the use of Chronic Absenteeism in the Early Grades as an initial placeholder.

- Finally, beyond the plan, it has come to our attention that the state has options regarding the methodology used for the current set of schools identified for supports. We hope that the state quickly makes a determination about this methodology. In many ways, expedited communication of this initial methodology may be more critical than the expedited submission of the plan itself.

We at Advance Illinois make these recommendations in hopes that this furthers the conversation among stakeholders on how to build the type of system that fosters success for all students. We continue to believe the new ESSA plan should articulate a system that is fair to students and educators, clear to stakeholders, and supportive of continuous improvement. These are the key principles of any plan.

We are grateful for the opportunity to participate in the ESSA process and look forward to ongoing collaboration. We hope that with additional discussion and engagement in the coming weeks and months, we can be certain that in practice the plan will fulfill our principles.

Thank you for the opportunity to be a continuing partner.

Sincerely,

Ben Boer

Deputy Director

Advance Illinois



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

March 1, 2017

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 third draft of the Illinois State Board of Education's plan to implement the Every Student Succeeds Act (ESSA).

The promise of ESSA is its focus on equity, support and resources to public schools. In Illinois, meeting that promise requires both increased financial support and regulatory changes. Illinois' broken funding system will stand in the way of achieving ESSA's potential, absent new and equitable funding for public education. Even if the ESSA state plan is well-crafted and well-implemented, with robust buy-in from all stakeholders – parents, students, professional educators, and school communities – deep funding inequities threaten to eclipse the benefits. Simply put, there's no path forward to equity without additional, significant support for schools that serve the State's most vulnerable students. The State's willingness to make the changes for ESSA's promise to become reality is paramount.

Unfortunately, federal education policy makes Illinois' work harder. Federal ESSA regulations may no longer exist when the Illinois State Board of Education meets in March to consider the Illinois ESSA plan scheduled for submission in April. Any repeal of existing federal regulations would create uncertainty as ESSA implementation begins, especially in regard to civil rights, equity and financial accountability.

In the midst of this federal disruption, we are concerned about the direction the state may take public education through its decisions regarding the ESSA plan. ESSA requires states to develop a complex accountability system, much more so than the failed, yet simplistic policies of punishment and attainment on standardized tests of No Child Left Behind. While the details of this new, complex system should be finalized with all deliberate speed and based on practitioners' experience, Illinois's underlying framework should focus on the state providing inputs and resources public schools need to support all students.

We have long argued against the thinking which says public school systems can address the challenges their students bring to school with them each day without this focus on inputs, as well as shifting direction to provide all public schools sufficient and equitable funding. As a result, we support the work of the Illinois Balanced Accountability Measure Committee (IBAM). Well before ESSA's passage, IBAM focused on inputs, resources, and supports as the foundation for continuous improvement in Illinois public schools. Comprised of education stakeholders who represent the state's practitioners, IBAM worked collaboratively to develop the strong consensus underlying the committee's recommendations. We support IBAM's recommendations on accountability for the ESSA state plan, particularly on major decisions, such as academic weighting and school quality indicators. The IBAM report also documents some areas where the groups did not find consensus, due in large part to the nature and complexity of these potential decisions, such as indicator weights and growth model methodologies. In general, however, practitioners' representatives spoke together: prioritize providing equitable and sufficient funding inputs and supports over punishment, rank and sort.

In reviewing the third draft of the Illinois ESSA plan, we want to note a new concern regarding Section 2.1 Consultation and the Appendix. The Illinois State Board of Education (ISBE) does not provide a full and complete record of all stakeholder comments in this draft of the ESSA plan. Section 2.1 does not fully reflect stakeholder written comments. The Appendix, by only presenting comments from the listening tours but omitting written comments from drafts one and two, also fails to provide a complete record of stakeholder input. It is concerning that ISBE continues to imply stakeholder consensus has been reached when it has not.

Our comments on the third draft are attached. They build on our previous written comments and highlight areas where the state should make decisions to support what our members' expertise speaks to and research supports (Lafortune, Rothstein and Schanzenbach 2016): Focus on inputs, resources, and equitable and sufficient funding for all public schools. Rather than maintaining a focus on narrow standardized test outcomes which heavily correlate to students' family income, the state should address funding inequities and insufficiencies, ensuring safe and healthy learning environments, fixing the Performance Evaluation Reform Act, avoiding overreliance on accountability as the driver of improvement, and providing schools with resources to comprehensively address stability and security.

We remind you of the set of jointly held ESSA guiding principles submitted previously by the IFT, the CTU and the Illinois Education Association. 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.

Sincerely,



Dan Montgomery

IFT President



Karen GJ Lewis, NBCT

CTU President

Enclosures



A Union of Professionals

CTU-IFT Comments on Content of Draft Three of the ESSA State Plan

Section 1: Long-Term Goals

CTU and IFT support ISBE's recommendation that long-term goals should be fifteen (15) years. We urge ISBE to set the interim goals at 5-6 years, consistent with the recommendation from the Illinois Balanced Accountability Measures Committee (IBAM). It is critically important that the state exercise caution so as to not repeat the failed policies of No Child Left Behind (NCLB) and Adequate Yearly Progress (AYP).

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. Should the federal accountability regulations be abolished, we urge ISBE to eliminate the single summative score from the state accountability system.

Subgroups

The state is proposing the addition of two new subgroups: former English learners and children formerly with a disability. While we understand the state's desire to monitor these students once they have exited services, simply tracking the progress of special populations will not be enough and the data will provide a very narrow definition of inequity. These students are still fragile learners, particularly in the time immediately following their completion of evidence-based programs and individualized support systems. They have reached levels of proficiency because they had additional support. Taking away support and expecting the same results by tracking students does not match the reality of the needs of the field. Schools may need to continue providing some level of scaffolding or support to these students, even after they have exited services, for them to make and maintain academic progress. It is critical the state do its part to provide adequate resources to support these students.

English Language Proficiency

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 a 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, both economic and political. 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.

ISBE has proposed a five-year timeline within which students should demonstrate English language proficiency. It is widely understood, and supported by research, that around third grade, students transition from “learning to read” to “reading to learn” and thus, the cognitive demands of academic language increase. There are many factors that influence a student’s ability to acquire academic language proficiency. These factors include the student’s initial level of proficiency, grade level, the amount of time the student has already spent in English language instruction, native language proficiency, and whether the student has had limited or interrupted formal education. These factors should be considered when making a high-stakes determination regarding school level accountability. We urge ISBE to delay the inclusion of English language learners in the accountability system to the greatest extent allowed. This will ensure that our youngest EL students have ample time in evidence-based programs to bridge the transition into academic language proficiency. The state should exercise caution to prevent the system from incentivizing schools to take a short-term approach to English language proficiency by pushing students to English proficiency too quickly and pulling them out of evidence-based programs too soon. This approach would conflict with research and best practices in second-language acquisition and result in students not having sufficient time to become well-grounded in both their native language and English, thereby impacting their overall learning.

Across the state, there are significant inequities regarding available resources for schools to support EL students. Some school districts have the resources to include bilingual personnel on staff, bilingual

tutors for multiple languages, interpreters for multiple languages, and staff to translate school documents and communications into multiple languages, while others must send their EL students to different facilities for part of the school day. Some schools do not have access to interpreters and translators, which results in English-speaking students, even early elementary students, becoming responsible for translating for their parents during encounters with the school. The state is doing these students a disservice by not providing equitable resources to fully support EL students and their families, especially in schools where there are multiple languages represented.

Additionally, our members are concerned about EL students who have specific learning disabilities and present a particular challenge to schools, both ensuring accurate identification and providing appropriate services and supports. Students who are both English language learners and have a learning disability are entitled to EL services and special education services. If the specific learning disability is not addressed, then acquiring English proficiency will be even more difficult for these students. The challenge for schools is having the resources available to ensure bilingual educational support personnel, including school psychologists, social workers, and special education teachers. For some schools, this may be necessary for multiple languages. Student access to bilingual educational support personnel is critically important to ensure accurate identification and prevent misidentification.

ISBE is recommending that the state conform with WIDA's guidance on raising the proficiency cut score on the ACCESS test to 5.0 as a response to the increased rigor of the revised assessment. Absent supports, this test will continue to identify the same students. Changing the test and changing the cut score will not change the results of students reaching proficiency unless needed supports and resources are available to schools. Until the state truly addresses equity and adequacy with school funding to ensure that schools that have the responsibility of providing additional services also have the resources – we will continue to see the same results.

Section 2: Consultation and Performance Management

Given the description, it is impossible to tell how IL-EMPOWER will provide differentiated technical assistance to all schools, what it will look like in practice, or how it will address school improvement efforts in a systematic, statewide way. Rather than focus scarce funds requiring districts to collaborate with IL-EMPOWER vendor-providers, ISBE can best serve schools as a clearinghouse to facilitate research-supported ideas and strategies. State Title I funds can be used to increase the capacity and staffing levels of ISBE and provide support to schools rather than funneling public dollars to private vendors. With greater capacity at ISBE, the state can focus not just on additional support for schools identified as needing comprehensive or targeted support, but also on ensuring equity in access, support, and resources for schools statewide which we know will impact student learning outcomes.

Our members are frustrated when additional funds are used for outside vendors instead of being utilized for direct classroom and student support. For example, recipients of School Improvement Grant 1003(g) (SIG) funds were required to have an outside vendor as Lead Partner. Many recipients paid one-third to one-half of their federal SIG award to outside Lead Partners, rather than on students and classrooms. To date, there is no qualitative or quantitative data on the effectiveness of external Lead Partners in Illinois SIG grants. In addition, our members in different geographic areas reported difficulties in finding Lead Partners willing to work in their region, or with their school district. As a result, SIG recipients did not have equitable and sufficient access to school improvement grant funds.

While MTSS is not specifically mentioned in draft 3, it is not clear why. Whether called RTI, MTSS, or IL-EMPOWER, the state has not sufficiently or equitably funded implementation to establish statewide MTSS capacity to meet the purposes of an MTSS process. We are concerned 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 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.

IFT and CTU will continue to oppose MTSS or IL-EMPOWER in its current form unless fully funded and resourced. 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 MTSS or IL-EMPOWER 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 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 unclear how IL-EMPOWER will address either aspect in a systemic, statewide way as the foundation of school improvement efforts.

The state plan acknowledges that school improvement happens over years, and 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 conditions, and meaningful performance evaluation systems. 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 and 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: 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. Under NCLB, districts shifted resources from other subject areas to math and reading, which significantly impacted a school's ability to provide a well-rounded education. Districts worked to keep class-size down in state-tested areas, while class-size grew in 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 PSAT test (with its ACT components), to high school PARCC for three years, and now to the SAT has created turmoil and unclear expectations for students, parents, teachers and public schools.

Public education in Illinois must focus on educating the whole child. If the state focuses assessment on narrow, standardized reading and math tests, public education will remain stuck in the failed accountability mindset of NCLB. Illinois 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 necessary. The National Assessment of Educational Progress (NAEP) provides a roadmap for this minimal administration principle.

The English Learner subgroup is the only subgroup of students that is assessed twice within the accountability system: English language proficiency and academic achievement. For many of these students, they take the PARCC or SAT in English, even when they have not demonstrated English proficiency. Our members have stated the importance of preserving a trusting relationship with their students. Learning is strongest when there is a positive, trusting relationship established between the teacher and student. Teachers work hard at developing these relationships because they know how critical it is to learning. When students take a test that is too hard and not written in a language in which they are proficient, the trust they have for their teachers is put at risk. Consequently, their learning is put at risk. ISBE should take full advantage of the flexibilities ESSA provides and work on developing academic achievement assessments in students' home languages.

Section 4: Accountability, Support, and Improvement for Schools

Growth Model Methodologies

We reiterate the concerns we communicated in response to draft #2 of the state ESSA plan. At this time, there is not enough information to support a particular growth model. The report submitted by the ISBE growth model Technical Steering Committee provided several considerations, the first of which was not to rush the decision process. At the January 24, 2017 IBAM meeting, both CTU and IFT voted against the simple linear regression growth model, not in opposition to the concept of growth measures, but rather in rushing to a decision about a particular methodology, without necessary and proper understanding of the consequences. Recognizing student growth is important, but we will continue to oppose any growth model methodology until the state has fully researched the accuracy and limitations of each model, as well as the potential impact on schools statewide. With federal regulations delaying implementation until the 2018-19 school year, we can thoroughly explore different growth models. This is as much a

political decision as it is a technical decision, and the implications of both must be fully considered before applying growth measure outcomes as part of the statewide accountability system.

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 has been considering a variety of 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 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, 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 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 has been rushed, especially when compared to past timelines for selecting a value table growth model, which was used only for information purposes. Further research is necessary in order to make a truly informed decision.

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.

Graduation rate

CTU and IFT appreciate the inclusion of 5 and 6-year adjusted graduation rates. This will provide flexibility for local schools and districts to support those students who need additional time to graduate without being penalized and will ensure a focus on students and the diversity of their needs.

Indicators of School Quality or Student Success

CTU and IFT appreciate ISBE following the recommendations of IBAM to include the following indicators of school quality or student success: chronic absenteeism and 9th grade on-track. These indicators align with data that is already being collected. Additionally, these indicators provide an opportunity for

teachers and other school level personnel to intervene when they first notice students struggling, thereby having the ability to effect change in a timely manner throughout the school year.

We are pleased to see the inclusion of climate surveys as an additional indicator of school quality or student success. We have consistently advocated for student, teacher, and parent voice to be included as part of the accountability system and look forward to the opportunity to help develop a suite of surveys that meet the statutory requirements and spirit of ESSA.

CTU and IFT oppose inclusion of a new college and career ready indicator in the ESSA accountability system. We voted in opposition to inclusion of this indicator at the January 24, 2017 IBAM meeting because it 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 again advocate for the following indicators to be included in the accountability system:

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.

These recommended indicators, combined with chronic absenteeism, percentage of 9th grade students on-track, and climate surveys will help achieve ISBE's stated long-term goals for school safety and quality. We will continue to voice our members' concerns as additional indicators are studied.

N-Size

CTU and IFT support the majority consensus of IBAM in recommending an n-size of 30 for all subgroups.

The state plan describes the processes by which data is analyzed and reported for accountability and identification. We continue to emphasize the importance of resource equity and sufficiency across the state so schools can focus on the inputs we know are most critical to improving student learning.

Annual Meaningful Differentiation

The state plan describes two systems through which schools will be identified as needing comprehensive or targeted support. It is unclear how these two systems will work. CTU and IFT are concerned that this new system is just another way to blame, shame, and label schools. Illinois schools lack sufficient and equitable funding and resources for all students to be successful. If Illinois wants to achieve its 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. Until then, the state plan will only be a different path to the same results under the failed policies of NCLB.

CTU and IFT oppose the five-level differentiation system described in the state plan. We stand by our concern that this system will be used to rank, sort, punish and negatively impact schools and

communities. Instead, ISBE should consider a system that uses descriptors that truly reflect a system of continuous improvement rather than ranking and sorting.

Weighting

To counter overuse and misuse of standardized testing, and to prioritize learning, inputs, and resources, indicators of school quality or student success should be weighted to the greatest extent allowable under ESSA. To that end, IFT and CTU support the IBAM recommendation that academic indicators be weighted 51% overall while the school quality or student success indicators be weighted 49%. Further, ISBE should examine ways to nest multiple measures within each of the indicators and examine ways to focus on growth within multiple measures. Without sufficient and equitable funding, the overall weighting should not be overly reliant on standardized tests results tied to community poverty levels, as the basis for both proficiency and growth measures in the state accountability system. When the state can demonstrate adequate and sufficient funding for all schools, then we welcome the opportunity to revisit and reevaluate the overall weights.

Page 47 of the third draft mistakenly states that the Chicago Teachers Union recommended a 60/40 percent weighting. This is the position of the Chicago Public Schools (CPS), not CTU.

The weights for each measure 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 plan continue to emphasize proficiency and growth using narrow measures. Further, they do not fully account for all ISBE's stated goals and do not account for inequitable and insufficient school funding. In setting weights, ISBE should 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. Further, as the state continues evaluation and improvement of the accountability system, including how the indicators and weights are interacting with each other and impacting meaningful differentiation outcomes, our members' input should be included..

Participation Rate

CTU and IFT recognize the importance of parents and guardians as a child's first teachers. We support a parent's right to opt-out their children from standardized tests. We oppose ISBE's proposal to penalize schools which do not meet the 95% test participation rate for three years in a row by identifying these schools as chronically underperforming and in need of comprehensive support and improvement.

Exit Criteria

CTU and IFT are particularly concerned about the requirement for schools to demonstrate through a sustainability plan how they will maintain a strong rate of growth while ensuring sustainability with reduced services, supports, and/or funding. It is unknown if the additional resources provided by the state to schools identified as needing comprehensive support will be sufficient, especially if a large percentage of those funds end up going to IL-EMPOWER vendors rather than the classroom. We know from our experiences with NCLB, that many schools identified are in high-poverty communities. To realize the promise of ESSA, supports and resources for schools have to be adequate and equitable. It makes no sense to identify a school as needing additional supports and resources, provide those resources, and then withdraw the resources at the arbitrary point at which they are no longer identified.

The community's poverty will not go away. To expect a school that has demonstrated improvement to suddenly "do more with less" conflicts with the intent and spirit of ESSA to support schools rather than punish them. Again, Illinois must get school funding right, fix funding inequity and inadequacy across the state, and operationalize adequate support for struggling communities.

Evidence-based Interventions

The Illinois 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.

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. 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, funding and effort to help all students living in poverty.

As we explain in Section 2 of these comments, CTU and IFT oppose ISBE's intention to design and implement a review and approval process for external providers that appears to form the basis for IL-EMPOWER, rather than build ISBE internal capacity. We are concerned that the state would undertake a similar, untested concept for implementation of statewide MTSS.

Educators have spent many hours working on and deliberating over the Illinois Balanced Accountability Measures Quality Framework and Rubric. As the state delineates a clear role for this IBAM work as part of a school needs assessment, the state must ensure needed ISBE staffing levels and capacity are present to provide needed resources and supports to schools.

More Rigorous Interventions

CTU and IFT are concerned that ISBE has still not included any detail on what "more rigorous interventions" would look like. We know from our members, as well as outcomes based on the 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 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.

Periodic Resource Review

ISBE's proposal for a periodic resource review appears to reflect concerns regarding equity in multiple areas. ISBE should be as transparent as possible in this process, and include stakeholders of representative groups. This is another area where our members' voices, representing a diversity of experiences across the state, should be included, and collective bargaining rights must be honored.

Section 5: Supporting Excellent Educators

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 learning opportunities that become successful adults and citizens. 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 include local unions in the planning and delivery of professional development and include sufficient time, support, and resources for teachers to master new content and pedagogy and integrate this knowledge and skill into their practice. It should 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.

Skills to Address Specific Learning Needs

We are concerned that ISBE appears to rely on many initiatives that are incomplete, in development, and/or 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. CTU and IFT support the idea that schools and districts, coupled with the authentic involvement of teachers' unions and families, are in the best position to identify both areas of strength and areas in need of support. However, we oppose ISBE's idea that IL-EMPOWER, with its use of outside vendors, is the best avenue for accessing and

realizing the improvement that results from additional levels of support. Instead, we urge ISBE to increase its capacity to serve and support schools so that public dollars can be directed toward classrooms rather than outside vendors.

Teacher Residency Program

Recent changes to testing, performance evaluations and preK – 12 policies generally are contributing to teacher shortages in the United States and Illinois, while not addressing the underlying challenges facing economically stressed communities, and in response the ESSA plan may open the door to “fast track” licensure programs. We believe teaching is a personal and human endeavor, each teacher developing confidence, capacity, management, perspective, and a repertoire from which to draw, over the course of years. Research has shown mentoring, guidance and support from experienced educators provides structure for developing new teachers, increasing the likelihood that novice educators will commit to their students, grow in the profession, and remain in the classroom. Illinois’ college and university professionals have demonstrated commitment, knowledge, institutional memory and skill acquired over decades of service in preparing teachers. CTU and IFT advocate for policies that value and respect the wisdom, experience, and authority of Illinois college and university professionals in identifying, preparing and determining which teacher candidates demonstrate evidence of teaching effectiveness. We support teacher preparation programs, including teacher residency programs, which fully prepare and license teachers before they become “teachers of record,” and oppose those that do not. Further, we advocate for teacher preparation programs, rooted in institutions of higher education, which recruit teachers from diverse backgrounds who have a long term commitment to students and schools.

Definitions

The 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). Noting that the observation ratings are lower for teachers in low-income schools, this raises concerns that ISBE’s proposed definition for “ineffective teacher” will unfairly target teachers who work in schools that serve higher numbers of students living in poverty. This category is often indicative of broader systemic issues related to community and school resources and inputs, and not the individual teaching context. In fact, such a definition perpetuates the problem it is trying to remedy, as these ratings categories can label teachers who are doing important work with hard to educate students “ineffective,” and the rating creates a strong disincentive (potential job loss) for highly skilled teachers to work in the most challenging environments, thus denying students important learning opportunities.

Section 6: Supporting All Students

CTU and IFT are pleased to see a commitment from the state to evidence-based behavioral health programs, high-quality after school programs, family engagement, and community schools. These are all examples of important inputs that contribute to a well-rounded educational program and address the diverse needs of the whole child. Given the possibility that educational funding from the federal

government could decrease, it is even more important for Illinois to resolve its equity and adequacy funding issues. We strongly urge ISBE to maintain a commitment to these programs even in the potential absence of federal funding.

CTU and IFT recognize the importance of schools and districts having the flexibility to apply Title I funds to address their locally determined needs. The shift in the poverty level threshold from 40% school-wide to 20% reflects that need for increased flexibility. While we support the increased number of schools that would have more flexibility in how they allocate and use their Title I funds, we have concerns that this will result in our highest-poverty schools losing critical funding for their students. We support this threshold change as long as there is not a decrease in per pupil allocation for Title I funds.

Early Learning Comments on ISBE's ESSA Plan – Round 3

March 3, 2017

The Early Learning Council appreciates ISBE's ongoing engagement throughout the process of developing an ESSA state plan. In particular, we are grateful for ISBE's acknowledgment of the importance of early childhood and the transition into elementary school, the value of ExceleRate (the state's quality rating and improvement system), the need for early childhood mental health consultation, and the importance of ISBE's role on the Early Learning Council itself. We look forward to continuing to working in partnership with ISBE in the development of the state plan.

While in several places these recommendations specify that the Early Learning Council is interested in working with ISBE to build out these recommendations, it is important to state up front that as a general rule the Council is eager to partner with ISBE to ensure the success of the state plan and its recommendations. This document highlights some areas where that may be of particular importance. While the Council's ESSA team has recommended that ISBE take some additional time to complete the ESSA plan and that it should target the September submission date, we stand ready to work with ISBE on whatever timeline it chooses.

4.1 Accountability System

- The Early Learning Council's recommendations include a recommendation that the state's accountability system include a direct focus on K-2, particularly through the chronic absenteeism metric. Chronic absenteeism was in fact included in the metrics (pp. 36-37), which we appreciate. However, there was no discussion of how the K-2 grades might be called out for special focus.
 - We recognize that the "business rules" methodology for assigning schools to tiers (pp. 48-49) differs from that in previous drafts, and that accordingly the manner in which K-2 could be integrated would need to be different than what was originally proposed. The Early Learning Council ESSA team is prepared to work with ISBE to see that K-2 be appropriately weighted in this methodology.
- ISBE proposes to use climate surveys as part of its accountability methodology. We believe surveys can be valuable tools, and also acknowledge that the challenges of surveying students differ for different age spans. We would like to engage with ISBE for further discussion of how survey data relating to the early grades might be used appropriately within the boundaries set by ESSA.
- On page 40, ISBE identifies some areas where it will convene workgroups to discuss potential school success/school quality indicators. In a previous draft, ISBE indicated a willingness to engage in further discussions on a K-2 indicator, and the Early Learning Council recommendations specifically highlighted the need for such discussion. We recommend that ISBE include on its list of work groups to convene a work group around K-2 indicators. The Early Learning Council is eager to work with ISBE to ensure the success of that work group.
 - ISBE notes the P-20 Council's recommendation that ISBE consider additional indicators to be reported outside of the accountability system. The Early Learning Council made some specific recommendations regarding such indicators, and we recommend that the ELC be included in ISBE's work group.

4.2 Identification of Schools

- We agree with the exit criteria proposed for schools by the Consortium for Educational Change. We would note that under 4.2.A.ii.3 (p. 54), we would recommend that when considering the quality of a

school's sustainability plan, the state consider whether the plan addresses the early years. Specifically, where many children are entering not ready for kindergarten, a successful sustainability plan will need to include strategies for improving kindergarten readiness and sustaining those gains through the early elementary years. We believe the plan would be strengthened by articulating that directly; if it is not articulated directly in the plan, we would strongly recommend that it be included in more detailed follow-up implementation documentation.

- The same issue arises under 4.2.B (p. 56, bottom of the page).
 - The Early Learning Council has provided more detailed recommendations about school improvement planning and needs assessments, and we hope ISBE will incorporate those recommendations into this plan and in follow-up guidance to the extent possible.
- On page 60 ISBE identifies numerous areas that would be included in a periodic resource review of LEAs. We recommend that investments in early learning be included in those reviews – including both investments by the district itself, and federal and state investments in non-district providers serving children who live within the LEA (including private providers of Head Start and/or Preschool for All).

6.1 Well-Rounded and Supportive Education for Students

- Issues regarding student discipline practices are addressed separately on pages 73, 78 and 80. We encourage ISBE to be more specific. Please consider the following recommendations:
 - 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>.
 - We recommend that ISBE 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. We recommend that schools 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.)
- On page 74 ISBE highlights the importance of the continuum of a student's education. We recommend placing a greater emphasis on the implementation of best practices in transitioning children from stage to stage, including transitions from birth to three services into preschool and Head Start programs, and then from these programs and services into kindergarten. We encourage ISBE to include the following specific language:
 - 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.
- Parental engagement is referred to on an ongoing basis throughout Section 6. It is imperative that there be specific language from ISBE about meaningful parent, family and community engagement in the early years. Some specific recommendations:
 - ESSA allows a portion of family engagement funds to be used for joint professional development inclusive of early childhood educators. 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.
 - 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.
 - We recommend that ISBE 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. If ISBE commits to the development of these tools the Early Learning Council would be pleased to work in support of ISBE as it does so.
 - On page 75 (third paragraph): the 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.
- On page 75 ISBE discusses its FAMILY ENGAGEMENT FRAMEWORK and its companion tools. The agency is committed to developing additional tools and resources for students with disabilities and EL students. To enhance this process consider the following recommendation from the ELC:
 - 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.
- The subgroup of children with disabilities is discussed in various places of the state plan. The needs of this subgroup in the early years is critical to address. ISBE should consider the following recommendations:
 - 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.
- On page 80 ISBE acknowledges the importance of technology and digital literacy for all students. The ELC has approved the following recommendation that should be included in the plan:
 - 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>
 - Page 81 discusses the poverty threshold to receive Title I funds. We ask ISBE to consider the following recommendation:
 - 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.
 - On page 86 ISBE outlines how recruiters will document eligibility information for migratory students. In order to ensure that our youngest learners are adequately cared for in this process, we ask ISBE to consider the following:
 - 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.
 - On page 93 ISBE discusses the current English Language proficiency assessment and composite score. ISBE is also conducting a work group to reconsider the cut score. As that is being considered, it is imperative that ISBE provides the following specificity around its identification of ELs, ELs with disabilities, and the personnel who serve them. We ask the State Board to explicitly discuss its commitment to the following recommendations even as the work is in progress:

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/ecd/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.
 - 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.
- We applaud ISBE for acknowledging the critical needs of early learners in homelessness on pages 96-105. Homeless services could be further amplified with the following considerations from the ELC:
 - Update the Common Form to better reflect and support referrals to early care and education programs, particularly those programs that serve infants and toddlers.
 - 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

From: Acasia Wilson [<mailto:awilson@e4e.org>]
Sent: Wednesday, March 01, 2017 8:54 PM
To: ESSA
Subject: Comments on ISBE Draft ESSA Plan

To: Dr. Tony Smith, State Superintendent of Education
From: Acasia Wilson Feinberg, Executive Director, E4E-Chicago
Subject: Comments on ISBE Draft ESSA Plan
Date: March 1, 2017

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 finalizes 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 third draft ESSA plan for the State of Illinois.

First, we focus on **Section 5.2**, which outlines how the SEA will increase the quality and effectiveness of teachers. We recommend better alignment between teacher evaluation data and targeted professional development. Specifically, we recommend that the following suggestions be incorporated into the **Professional Learning and Resources for Educators (pg. 64-65)** section, in order 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 include which domains and indicators from their teacher evaluation system are aligned to their "professional development" offerings.
- 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.

Since the current ESSA plan incorporates the [2015 Illinois Equity Plan](#) into **Section 5.2 (pg. 64)**, our members also 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. As such, we suggest **elaborating on the strategies to eliminate identified equity gaps that are currently included in the Illinois Equity Plan (p. 29-30)**, by:

- Expanding the role of **professional development to address both educators and administrators** and providing guidance to districts regarding how they can use Title II funds to support professional development. Specifically:
 - ISBE should provide guidelines and requirements that emphasize the need for administrators and districts to create plans and strategies focused on improving the performance of ineffective teachers rather than on redistribution.
 - ISBE should place an emphasis on providing training and support to administrators that would help them to better identify, coach, and support ineffective teachers.
- Including **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.

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. While we are encouraged by the inclusion of language around the importance of shared leadership within schools and districts in the **School Leaders and Administrators section (pg. 66)**, we specifically recommend Illinois use optional funds for competitive grants that promote **teacher leadership through innovative teacher leader or hybrid roles that utilize distributed leadership models**.

Finally, we would like to express our concerns regarding **Section 4.1, Accountability System**. As mentioned in our national policy paper authored by E4E members, [*From the Classroom to Congress: ESEA Policy at Play*](#), E4E teachers nationwide believe that any accountability system must ensure that states and districts are held accountable for serving all groups of students (such as low-income students, students with disabilities, African Americans, Latinos, and English learners).

As currently written, we believe that the **summative ratings (pg. 49)** will not appropriately hold districts accountable to serving all sub-groups of students. We implore ISBE to **more clearly define how sub-groups will be factored into the summative rating system** to ensure that districts and schools are held accountable for the success of all students.

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

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Acasia Wilson Feinberg

Executive Director, E4E-Chicago



t: 312-546-6674

m: 480-220-5640

351 W. Hubbard St., Suite 805
Chicago, IL 60654



ILLINOIS CHAMBER OF COMMERCE

The Illinois Chamber of Commerce appreciates the opportunity to offer comments on Draft #3 of the Every Student Succeeds Act (ESSA) State Plan. Illinois Chamber members believe that a strong education system and a strong business environment correlate to a strong Illinois. It is key to securing Illinois' economic future that we provide all students the opportunity, skills, knowledge, and ability to be productive citizens. We stand ready to support further discussions on this important topic as it is critical our education system remains adaptive to a changing environment. As such, we offer the following comments in an effort to achieve those goals.

College and Career Readiness Framework (Section 4.1, pg. 38)

The Chamber is encouraged with the progress made on the college and career readiness indicators in the ESSA State Plan. The Chamber has been engaged in discussions on the college and career indicators with several stakeholders, and while the framework under discussion is not included in the ESSA State Draft 3 Plan, we feel the existing draft is improved over Draft 2. However, concerns remain that many of the career indicators lack a definition. Terms included in the career readiness indicators should be made plainly clear and a lack of definition makes it difficult to determine the rigor and appropriateness of the indicators to determine career readiness.

Every student should have an experience that prepares him or her for college with participation in a career readiness component. Ultimately, to be career ready, students should be able to show a combination of the following - proficiency on core workforce readiness assessments and academic proficiency; successful completion of career-related courses or dual credit coursework; participation in a high-quality work-based learning experience or attainment of an industry credential; and meaningful guidance on a college and career plan.

The state should ensure that all students have the opportunity to attain an advanced level of readiness beyond college readiness, but allow for local flexibility to make almost real-time adjustments in response to change in the business environment and across industries.

To further prepare a student to be ready to pursue a career path, the Chamber offers further consideration:

- *Industry Credential:* What is defined as an industry credential under the ESSA State plan? Industry credentials need to be valued and recognized by employers, such as those offered by WorkKey, CompTIA, Manufacturing Skills Standards Council, and others. Opportunities can also include other forms of credentialing such as diploma endorsements in a career field or program of study.
- *Military Service:* The Chamber echoes the suggestions of others that the more appropriate measurement for military service as a career indicator is JROTC, not ROTC. ROTC is a post-secondary activity that has no bearing on college and career readiness.
- *Attaining and maintain consistent employment:* The Chamber suggests the Board further define this indicator to include consecutive, full-time summer employment. This allows opportunities



ILLINOIS CHAMBER OF COMMERCE

for students who are only able to take on employment in the summer months due to transportation issues or academic pursuits.

- *Co-Curricular Activities*: What is defined as a co-curricular activity? Definition of this term is key to understanding its appropriateness as a career indicator.

General comments: The Board should consider the balance between increasing the number required to meet College and Career Ready distinction with the ability of school districts to provide all of the academic and career indicator options listed. By increasing the number of indicators needed to meet this standard, students from school districts with fewer opportunities available may be at a natural disadvantage. The State must also consider the costs associated with being able to provide these opportunities. With the current fiscal situation in Illinois and discussions over the appropriate funding of K-12 in the State, the State should recognize that increasing the rigor on students comes at a cost to local districts, its businesses, and residents.

Weighting of Indicators (Section 4.1, pg. 47)

The Illinois Chamber urges the ESSA State Plan to include strong state accountability requirements and weights to ensure students are adequately supported.

It is important that the weighting of indicators properly weights growth and outcomes, so as not to disadvantage schools or students for making progress. As such, the Chamber believes the weighting scheme of each indicator should be measured at a 70/30 or above makeup. Aiming for a high standard will ensure that growth and outcomes are acknowledged and Illinois students can remain competitive among their peers.

The Chamber thanks ISBE for the opportunity to offer comments. We stand ready to continue working with stakeholders to craft a plan that prepares Illinois students for successful lives. We appreciate your consideration of our recommendations.

Illinois Association of Regional Superintendents of Schools

ROE/ISC BRIDGE TO ESSA

The Every Student Succeeds Act requires services and support be provided to schools and districts. The purpose of these services is to impact students and education at all achievement levels. Services include Foundational Services, Targeted and Comprehensive support. Foundational Services will continue through FY18. Services through the Illinois Center for School Improvement to Targeted and Comprehensive schools expire at the end of FY17. This “bridge” is a proposal to efficiently deliver services to those districts during FY18 until full implementation of ESSA and the Illinois plan.

Regional Offices of Education and Intermediate Service Centers have long established relationships with all schools within their respective regions. The ROE/ISC fiscal agents could service schools as such:

I. Comprehensive Schools

- 1) Serve the same schools as identified on the priority list, based on graduation rates and low-performing status.
- 2) Work with School Improvement Grant (SIG) lead partners to better serve in a coordinated effort. Coaches work, in SIG schools, would be driven by the SIG administrative team.
- 3) Provide coaching, technical assistance, and Professional Development outside of the parameters of Foundational Services, based on District Improvement Plans.
- 4) Develop within each area, realistic targets until full implementation in FY19.
- 5) Work with district leadership and leadership teams to identify changes in ESSA implementation and legislation.

Illinois Association of Regional Superintendents of Schools

ROE/ISC BRIDGE TO ESSA

6) Continue offering Foundational Services as needed and identify specific areas of need in each school/district.

II. Targeted Schools

Same as mentioned above with the exception of 2).

III. Foundation Services would continue as described in other documents for FY18.

Personnel: District coaches are currently employed by ROE/ISCs. Effective coaches could continue in their positions to serve schools during the bridge year. To oversee their work, a .5 up to 1 FTE per Area administrator would be employed. Also to be considered are the Content Area Specialists. Currently these specialists are employed by an ROE, ISU, or AIR. Any AIR specialists could be employed by an ROE. This would eliminate multiple levels of administration, including upper management at IL CSI and the District Liaison (DL) level. The Assistant Director would not need to be a full FTE depending on the number of schools served.

Budget: Only budget lines needed are included in this proposal. The Bridge year would fund each of the six ROE Areas using the current Fiscal Agents and the three ISCs with a total of 9 fiscal agents. Budget lines include: Coaches for Comprehensive and Targeted schools, Project Administrator, and possible Content Area Specialists as needed (Salaries and Benefits), Travel both local and occasional statewide meetings, 5% Administrative Costs including housing costs and bookkeeping costs, ELN subscriptions (\$166,667 each F.A.), and Area-wide evaluation costs.

Documentation of Work: Time and Effort reports with detail of number of contacts and hours worked in schools. Work must be tied to district/school goals and plans in regards to

Illinois Association of Regional Superintendents of Schools ROE/ISC BRIDGE TO ESSA

academics, behavior, climate/culture, achievement on assessments, truancy rates, etc. Each school/School-Wide System of Support team will develop a short-term, one year plan. Internal performance evaluation will be conducted by ROE/ISCs in coordination with the schools served.

This goal of this proposal is provide high quality services to districts across the state of Illinois as we finalize our state's ESSA plan and prepare for its full implementation in FY19. Using current Fiscal Agents and coaches taps into the firmly established relationships between service providers and stakeholders. The partnerships currently in existence with ISU, IPA, IASA, IASB, MTSS, and ROEs/ISCs will continue to thrive to provide coverage necessary and beneficial to all schools in IL during the transition to full ESSA implementation.

English Learners and the “Every Student Succeeds Act”

State Goals for Education:

The recent ESSA legislation redefines school accountability for Illinois. Goals within the plan include that 90% or more of Illinois students graduate from high school ready for college and career and 60% of Illinois residents earn high-quality degrees and career credentials by 2025.

EL Demographic Information: Illinois ranks fifth in the nation with an EL population of approximately 10%. The vast majority of English learners are Spanish speaking (78%). Most English learners are enrolled in preschool through third grade and they reside in 82 out of 102 counties in Illinois.

Context:

Illinois is a leading state with regard to early education and a progressive state with regard to Latinos and English Learners. The state leads with a mandate for bilingual education, which begins with early childhood and a school code which requires bilingual education K-12. In 2013, the Seal of Biliteracy legislation for eligible high school seniors was passed. The Seal honors students who demonstrate college readiness in English and high levels of fluency and literacy in a world language. The Seal promotes that Illinois remains economically viable within a global economy. The Illinois accountability system must incentivize these goals.

Theory of Action for English Learners:

If the Illinois school accountability system under ESSA incentivizes schools to provide high quality language assistance programs, then English learners will graduate from high school with the language skills necessary to enroll in post-secondary education or pursue careers in a global society.

Specific Recommendations for the Illinois ESSA Plan:

- ✓ ISBE Board will adopt a long-term goal for ELs as part of the ESSA Plan
- ✓ All EL students in state funded preschool programs will continue to be identified and served prior to Kindergarten.
- ✓ Upon enrollment in the K-12 system, ELs are identified, assessed, and placed into Transitional Bilingual Education or Transitional Programs of Instruction.
- ✓ Beginning in first grade, all ELs will be expected to achieve English proficiency within 5 years.
- ✓ ISBE will redefine criteria for the reclassification of ELs in light of ACCESS 2.0, which is aligned to college readiness standards, by June of 2017.
- ✓ The “N” size for the EL subgroup will remain at 30 in order to be statistically valid.
- ✓ A five year “Growth to Proficiency” statistical model will be employed to calculate progress on English proficiency.
- ✓ ISBE will establish interim targets, once baseline data is analyzed, and report on schools in one of three categories: schools making better than expected growth, schools making adequate growth, and schools making less than adequate growth.
- ✓ ELs will be assessed annually for English proficiency and for English Language Arts and Mathematics. Growth in content areas will be emphasized over attainment.
- ✓ Newly arrived ELs enrolled in their first year in US schools, in grades 3-12, will be assessed in content. Data from the first year will be used as a baseline for calculating growth in subsequent years.
- ✓ Illinois will continue to explore ways in which to insure valid and reliable assessments for Spanish speaking ELs in language arts and science which is promoted by Title I under ESSA.
- ✓ ISBE will establish two distinct subgroups for reporting purposes: active ELs and former ELs.
- ✓ The former EL subgroup will include students through high school graduation in order to provide longitudinal data to inform school improvement.

Rationale for EL Recommendations:

- ✓ **ISBE Board will adopt a long-term goal for ELs as part of the ESSA Plan**
Current ISBE adopted Board goals do not include a specific mention of English proficiency, now a mandated component of school accountability.
- ✓ **All EL students in state funded preschool programs will continue to be identified and served prior to Kindergarten.**
Illinois Administrative Rules Part 228 call for ELs enrolling in state funded preschool to be identified, screened and served if their level of English proficiency is below the criteria established by the state.

- ✓ **Upon enrollment in the K-12 system, ELs are identified, assessed, and placed into Transitional Bilingual Education or Transitional Programs of Instruction.**
The procedure is pursuant to ILSC Article 14 C and is explicitly stated in Administrative Rules Part 228.
- ✓ **Beginning in first grade, all ELs will be expected to achieve English proficiency within 5 years.**
Kindergarten data will serve as baseline for calculating growth. First grade is compulsory in Illinois and, according to Administrative Rules, defines the first year of EL service. Accountability must align to Administrative Rules.
- ✓ **ISBE will redefine criteria for the reclassification of ELs in light of ACCESS 2.0, which is aligned to college readiness standards, by June of 2017.**
The newly defined reclassification criteria should be adopted by ISBE in time to be applied to the 2017 data. The current Illinois reclassification criteria are not recommended by experts. Illinois requires students to achieve a 4.2 in reading and writing in order to determine when EL students are ready to transition to the general education program. Research demonstrates that achieving a 5.0 overall composite on ACCESS 2.0 is a sufficient indicator of readiness for the general program. Applying the current reclassification criteria to ACCESS 2.0, results students remaining in services they may no longer need. The Illinois criteria were adopted with reference to the former version of ACCESS, which was not aligned to college readiness
- ✓ **The “N” size for the EL subgroup will remain at 30 in order to be statistically valid.**
There is no expert consensus on statistical validity for subgroup sizes less than 30. Illinois has a historical practice, which began under NCLB, of reporting on ELs as a subgroup once a school has thirty or more enrolled.
- ✓ **A five year “Growth to Proficiency” statistical model will be employed to calculate progress on English proficiency.**
ACCESS data from 2016-17 will serve as the baseline. Student trajectories will be calculated based on their starting level of English proficiency, grade level, and the five year timeline for attaining proficiency. The percentage of students on track for expected growth will be reported at the school level. ISBE will establish interim goals with the collaboration of stakeholders based on data analysis.
- ✓ **ISBE will establish interim targets and report on schools in one of three categories: schools making better than expected growth, schools making adequate growth, and schools making less than adequate growth.**
Many states are considering placing schools into these three categories as they weight the indicator in the overall accountability system.
- ✓ **ELs will be assessed annually for English proficiency and for English Language Arts and Mathematics. Growth in content areas will be emphasized over attainment.**
ELs are the only subgroup assessed twice annually for English proficiency and content knowledge. As students grow in their English proficiency, they will perform better on content exams. Measuring the growth of ELs is more realistic for understanding their academic trajectory.
- ✓ **Newly arrived ELs enrolled in their first year in US schools, in grades 3-12, will be assessed in content. Data from the first year will be used as a baseline for calculating growth in subsequent years.**
Data from first year assessments should not be included in accountability determinations but serve solely for baseline purposes.
- ✓ **Illinois will continue to explore ways in which to insure valid and reliable assessments for Spanish speaking ELs in language arts and science, which is promoted by Title I under ESSA.**
States such as California, Texas, Minnesota and New York are working towards making Spanish assessments available in language arts and mathematics in order to demonstrate students’ knowledge and skills. ESSA Title I strongly encourages states to consider these home language assessments when 30% of the ELs enrolled in the state share the same home language. In Illinois, 78% of ELs are Spanish speaking.
- ✓ **ISBE will establish two distinct subgroups for reporting purposes: active ELs and former ELs.**
Data from each subgroup can be analyzed for school improvement planning. This practice is strongly recommended by EL national experts. If ELs receive appropriate services, the former EL subgroup should excel on all state metrics commensurate with their English speaking peers.
- ✓ **The former EL subgroup will include students through high school graduation in order to provide longitudinal data to inform school improvement.**
In order to meet the goals set forth by the ISBE Board and the P-20 Council, it is necessary to monitor longitudinal data well after students have completed their services. Schools that demonstrate success with former ELs over the long-term should be recognized for their success.

Illinois State Board of Education
English Learners and the *Every Student Succeeds Act*

Best practice in designing accountability systems requires setting long-term and interim goals for students. This is based on designing an accountability system responsive to the local state context and a “Theory of Action,” which will foster the desired outcome. The accountability system should not undermine research and best practice for any particular group of students. Empirical studies have demonstrated that the English Learner (EL) subgroup performs best over the long-term when instruction includes use of the home language and well-designed English as second language (ESL) instructional methods. A growing number of schools and districts are implementing dual language programs which incorporate the use of the home language and ESL throughout the elementary years and into high school with documented success. Therefore the assessments and EL indicator must be carefully considered to capture actual student growth and to incentivize schools to offer appropriate language assistance programs. It will be critical to follow students after they transition from the EL classification to determine if the students are meeting state goals.

State Goals for Education: The recent ESSA legislation redefines school accountability for Illinois. Goals within the plan include that 90% or more of Illinois students graduate from high school ready for college and career and 60% of Illinois residents earn high-quality degrees and career credentials by 2025.

Theory of Action for English Learners: If the Illinois school accountability system under ESSA incentivizes schools to provide high quality language assistance programs, then ELs will graduate from high school with the language and academic skills necessary to enroll in post-secondary education or pursue careers in a global society.

Specific recommendations to ISBE ESSA Draft 3- Latino Policy Forum- February 13, 2017
Changes to the text of Illinois ESSA State plan are in bold

Page	Section	Specific Recommendations
8	<i>Long Term Goals Section A: Academic Achievement</i>	ISBE Board will adopt a long term goal for ELs as part of the ESSA Plan <u>Add:</u> Ninety percent of English learners will attain English proficiency within 5 years.
13	<i>Long Term Goals Section C(2): English Language Proficiency</i>	Illinois proposes a maximum timeline for English learners to achieve ELP on the annual ELP assessment, ACCESS for ELLs, commencing in first grade which is the first mandatory grade in Illinois. However, ELs in are not exited from English language instructional program services or status until attaining English language proficiency according to state established reclassification criteria without regard to the timeline.
13-14	<i>Long Term Goals Section C(3): English Language Proficiency</i>	<u>Add:</u> The student-level targets that English Learners make annual progress toward attaining English language proficiency on the ACCESS for ELLs within five years will be determined once Illinois establishes a revised ELP cut score for reclassification based on the ACCESS 2.0 assessment which is aligned to college readiness standards. ISBE will receive recommendations for the appropriate cut score from stakeholders by June 2017.
14	<i>Long Term Goals Section C(4): English Language Proficiency</i>	Please remove the last paragraph from this section and replace with the following: Growth will be measured for all EL students K-12 by using the growth to target method. Consultation from WIDA and stakeholder engagement determined the growth to target would best fit the English learner population and be the most understandable to parents. Students start on the growth trajectory at the composite proficiency level and grade at the time of their first annual assessment (ACCESS 2.0). The first year is considered year 0 or baseline. Year one growth is determined after the second annual ELP assessment. Growth to target trajectories will be calculated for students based on their grade, English proficiency scaled

		composite score, and the time it will take to reach proficiency using the 2016-17 baseline scores. Once data is analyzed to determine schools' actual number of students meeting the growth necessary for a 5 year timeline, ISBE in consultation with stakeholders, will set reasonable expectations of the percentage of students to meet growth targets. Schools will annually meet or exceed their goal of the percentage of students meeting their growth targets. Reporting categories will be: schools making below average progress with ELs, schools making average progress, and schools making above average progress with ELs, once data has been analyzed and targets have been established.
14	<i>Long Term Goals Section (C)(4): English Language Proficiency</i>	Add: ISBE will establish interim targets and report on schools in one of three categories: schools making better than expected growth, schools making adequate growth, and schools making less than adequate growth.
21	<i>Section 2(2.1)(B): Consultation and Performance Management "N" size for subgroup</i>	Maintain the n-size to 30. The threshold of 30 for a subgroup is generally considered the minimum sample size for statistical analysis. (Note: The total number of schools with ELs in Illinois is 2553. There appears to be a difference of 211 schools, depending on where you set the "N" size for the subgroup. If the subgroup size is set at 20- Illinois has 1354 of 2553 (53%) schools with enough students for a subgroup. When you keep the "N" size at 30- Illinois has 1143 schools (44%) that qualify for the EL subgroup.)
25	<i>Section 2.2(B): Monitoring</i>	Programmatic activities are determined by the employees who work closely with the grant recipients in order to maximize monitoring resources within ISBE. Add: School district staff found the on-site monitoring of EL programs to be effective for all overall improvement of EL programs when conducted by ISBE qualified staff.
30	<i>Section 3(B)(iv): Academic Assessments Languages other than English</i>	Add: Stakeholders have requested native language assessments for PARCC language arts for at least the Spanish speaking subgroup which takes into account 78% of all ELs in Illinois. The state will continue work with stakeholders to identify all possible funding streams and technical resources to support this work. It is anticipated that we will continue to offer a trans-adapted version of mathematics for the 3-8 general education assessment and that we will seek to extend this opportunity to other content areas and assessment. (Omit final two sentences)
42	<i>Section 4(C)(2)</i>	Change: Former English learners include students <i>who met the state reclassification criteria on ACCESS through high school graduation.</i>
49	<i>Section 4(F)(1): Academic Assessments</i>	Comment: There is disconnect between the annual meaningful differentiation system and the school summative ratings described on p. 49. Experts agree that the EL indicator must carry sufficient weight in the overall meaning differentiation calculations, which should tie to the summative rating system.
94	<i>(D) Title III Part A</i>	Add paragraph: English learners will be assessed annually for English proficiency and for English language arts and mathematics. Illinois will assess newly arrived ELs, enrolled in their first year in US schools, in grades 3-12 in academic content areas: English language arts, mathematics and science. Data from the first year assessments will not be included in accountability determination but serve solely for baseline purposes.

To: Dr. Tony Smith
Dr. Beth Purvis
Rev. James Meeks
Members of the IL State Board of Education

From: Mimi Rodman, Executive Director

Date: February 27, 2017

Re: ESSA Draft #3

We have appreciated the open and collaborative process that you and your staff have undergone to create Illinois's ESSA plan. However, we have serious concerns about both the substance of and inconsistencies within the third draft:

The plan is silent on how subgroup progress fits into the bigger picture. The rating system does not include any criteria for weighting subgroups or including subgroup scores in the overall system. Getting this right is critically important. Despite a multitude of flaws in No Child Left Behind, the attention to subgroups was perhaps its most redeeming quality. We hope to build on that and use the ESSA accountability system to focus on and work to close academic achievement gaps.

1. **Historically underserved subgroups should comprise a proportion of the overall weighting.** It should not be an asterisk, or a footnote, or a data point for reporting purposes only. Making progress for all students, including historically underserved subgroups, should figure into the overall rating. In stakeholder meetings, we discussed two methods for incorporating subgroup weights: dedicating some percentage of the total weight to subgroup scores, or downgrading a school one level for failure to achieve success with their subgroups. Instead, the draft contains neither of these. Consider incorporating something like Tennessee's draft plan, for example, where subgroup scores represent 40% of the total score.
2. **The second draft included an N-Size of 20, but in this draft it is not clear.** The draft says that IBAM recommended $n=30$, but it does not specify what number ISBE will use. We understand the importance of reliability of data, but we also want to ensure that is balanced with inclusion of students. Please return to $n=20$ in the final plan.
3. **There are conflicting (or at least confusing) criteria for how schools would be identified for comprehensive or targeted support.** On page 55, the plan says that "the state's methodology for identifying any school with a:

"consistently underperforming" subgroup of students, including the definition and time period used by the state to determine consistent underperformance, under 34 C.F.R. § 200.19(b)(1) and (c). Schools with consistently underperforming subgroups of students will be identified through the following methodology:

1. Any school that has failed to meet the 95 percent assessment threshold for all students or for one or more student demographic groups for the past three years in a row will be identified and notified of their eligibility.
2. Any school for which the Former English Learner subgroup's or the students formerly with disabilities subgroup's performance is on par with that of the "all students" group in any school will be identified for comprehensive supports and improvement."

Should that say "the 'all students' group in any school in the lowest-performing 5%?" Is the "lowest-performing 5%" determined based on proficiency rates, or on the as-yet-undetermined

100-point scale of each indicator averaged somehow, or in some other way? Are these ways of being identified in addition to having other subgroups on par with the all-students group in a school in the lowest-performing 5%?

The rating system suggested significantly minimizes the importance of growth. Most stakeholders suggested that growth be given more weight than proficiency. Binary achievement targets deflect attention across the spectrum of students and, instead, encourage attention to the small number of students who are “on the bubble” of crossing the proficiency threshold.

1. **The draft says that proficiency and growth will be equally weighted, despite strong stakeholder recommendations to more heavily weight growth.** The draft claims that the ED did not explicitly allow states to weight these two categories at different levels. However, ISBE has been clear that it supports a broad interpretation of ESSA that maximizes states’ flexibility to design their systems, even to the extent that the required indicators are not given much greater weight than other indicators, which ESSA clearly requires. Other state plans have proposed weighing growth more heavily and we encourage ISBE to do the same.
2. **The summative ratings proposed could significantly diminish the importance of growth.** ISBE has proposed a tiered system that would allow a school to score the second-highest rating (“mentoring”) if it is in the top 30% of *any* academic indicator and *any* school quality indicator. That means a well-off district that has high proficiency and low absenteeism could achieve no growth and no subgroup gains and still receive a “mentoring” designation. In addition, while moving away from a system based on a 100-point index might make sense, this is the first time the concept has been proposed, leaving stakeholders no time to weigh in on the approach. As drafted, this does not meet ESSA’s requirement that greater weight be given to the required academic indicators.
3. **There is still no growth measure in high school.** The advisory bodies and stakeholder groups convened value growth, but without statewide PSAT or multi-year PARCC tests in high school, the accountability for high schools will continue to miss important data around student growth.

The summative rating categories are not parent-friendly. We understand and echo the desire to have a system that focuses on supporting schools that are struggling, rather than punishing them.

1. **The summative rating categories of “mastering, mentoring, meeting, leading, and learning” are not intuitive for parents and end users.** The “leading” designation would be for any school that is within the top 85% on any academic indicator and 60% on any school quality indicator. Who would intuitively think such a school is “leading”?
2. **It is unclear how the five summative ratings and the indicators mapped onto 100-point scales would interact.** ISBE’s draft would rate schools on each indicator on a 100-point scale, the cut scores of which will be decided later with a technical advisory group. But we are unclear how or whether those 100-point scale scores would combine into a single summative score, and if so, how that score would not conflict with the five summative rating categories. If these systems are not coordinated, it would leave parents even more confused about how their child’s school is doing.

The supports and interventions section is vague. The most important part of the whole system is in this section, which right now is unclear.

1. **There should be an escalating system of support where schools receive technical assistance to help create improvement plans, and increasing interventions as needed.** As drafted, a school has a planning year and then three years of implementation to meet the exit criteria. What if it doesn't? And why must students wait four years to see whether the school is on the right trajectory? If a school does not improve after two years, there should be greater oversight and changes to the plan, rather than just doing more of the same.
2. **All identified schools should receive intervention, but only those that are not already adequately funded should receive the financial support.** This draft has improved by clarifying that most of the funding would go to Title I schools; we have continued to advocate that these limited resources should be allocated to underfunded schools and that schools with adequate resources should be required to fund interventions within their existing budget. Furthermore, schools identified for targeted supports are not required to partner with an IL-EMPOWER, leaving us to wonder what the supports for those schools will be to improve subgroup progress.

We believe that getting the plan right is more important than getting the plan submitted early. Months ago, we supported your expedited timeline that would enable you to submit the plan in the first round. We understand the value of having schools understand the system before the school year begins. But a plan that lacks significant details and includes inconsistent definitions will negate that benefit. First and foremost, we support submitting a well-drafted plan that recognizes progress of all populations of students – even if that means waiting until the next round.

Thank you.

Dear Secretary Purvis and Superintendent Smith,

I am writing to let you know of Stand for Children's significant concerns regarding the ESSA draft plan that is now on the Governor's desk.

Stand has participated extensively in the public conversations regarding this critically important issue. We have spoken at several meetings and have submitted comment letters regarding the draft plans.

As noted in our most recent comment letter, Stand is a member organization representing parents in communities across the state. Our parent members travelled to Washington D.C. twice, in order to urge a continued focus on education equity with the reauthorization of No Child Left Behind. Since then, ESSA has been a regular topic of our blogposts (we have one of the largest social media education audiences in the state) and advocacy efforts.

We also formed a fellowship specifically around ESSA. Our eight policy fellows are a racially diverse group of parents from all over Illinois. Many have submitted comments to ISBE. All are alarmed at the latest draft plan. We will be meeting with them this week to discuss our next course of action.

While we will be submitting an official comment letter in the coming days, we want to highlight now that our initial concerns include: the approach to overall weighting; a lack of clarity on the integration of subgroups; the increased N-size (which we believe should return to 20); and the confusing labels used for summative ratings.

You both have been eloquent and vocal in your commitment to educational equity. Regrettably, the draft plan appears headed in a different direction. We stand ready to work with you towards a significantly stronger plan.

Kind regards,
Mimi

Mimi Rodman | Executive Director | **Stand for Children Illinois** | O 312-626-2604 | M 312-532-4989 | mrodman@stand.org