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	Subject	ESSA Legal Reference	Ed Feedback to ISBE	Summary of ISBE Response
Title I Part A A.2.iii	Eighth Grade Math Exception	ESEA limits that exception only to those States that administer an end-of-course test as its high school mathematics assessment.	Because ISBE is not administering an end-of-course assessment as its high school assessment, ISBE may not utilize the eighth grade math exception	ISBE selected "No," to the prompt provided by ED. There is an additional explanation that shares the commitment of ISBE to ensuring that students complete assessments when academically ready to so.
Title I Part A A.4.iii.b.2	Long-Term Goals Extended Year Adjusted Cohort Graduation Rate	ESEA requires that a State identify and describe long-term goals for each extended-year adjusted cohort graduation rate that are more rigorous than the long-term goals set for the four-year adjusted cohort graduation rate.	ISBE presents the same 90 percent goal for the four-year, five-year, and six-year adjusted cohort graduation rates.	ISBE identified the a 2.0% increase for year 5 cohort and an additional .5% increase for the year 6 cohort.
Title I Part A A.4.iii.c.1	English Language Proficiency Long-term goals	The ESEA requires that a State identify and describe the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency.	ISBE provides a long-term goal and measurements of interim progress for the percentage of English learners "making targets," but does not describe what it means to "make targets" and whether making targets accounts for progress in achieving English language proficiency.	ISBE removed repetitive but inconsistent language and provided final proficiency targets. ISBE proposed a target maximum timeline of five years for EL to achieve ELP on the annual ELP assessment, commencing in first grade, which is the first mandatory grade for student attendance in IL. In June 2017, EL proficiency was established as a composite score of 4.8 or above on the ACCESS 2.0.
Title I Part A A.4.iv.a	Academic Achievement Indicator	ESEA requires a State to calculate the proficiency rate for the Academic Achievement indicator with a denominator of the greater of 95 percent of all students (or 95 percent of each subgroup of students) or the number of students participating in the assessments.	ISBE notes that a school cannot score at the highest level of proficiency if it does not have a 95 percent participation rate on the statewide academic assessments, which is permissible. It is not clear that ISBE is meeting the statutory requirement for calculating the Academic Achievement indicator.	ISBE will incorporate the 95 percent minimum student participation in assessment threshold as a final decision vector in determining the summative rating. Once ratings on the individual indicators have been calculated, and a preliminary summative rating determined, the school or districts participation rate will be considered. If a school does not have 95 percent participation rate, in total and for each student demographic group, it cannot receive the highest summative rating.

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Title I Part A A.4.iv.c	Graduation Rate Indicator	A State may only include measures based on State-designed long-term goals for the four-year adjusted cohort graduation and, at the State's discretion, one or more extended-year adjusted cohort graduation rates.	ISBE proposes to include within its Graduation Rate indicator a 9th-grade on-track measure until a growth measure is developed. If ISBE so chooses, it may include both the 9th-grade on-track and growth measures as School Quality or Student Success indicators, or it may include the growth measure in the Academic Achievement indicator for high schools.	Districts will have the opportunity to participate in the PSAT. Districts will be reimbursed for participation. At this time, growth will receive no weight. As implementation continues, the relationship between the required academic indicators (e.g., EL Proficiency, Academic Attainment, Graduation Rate) and growth will be revisited. In regards to the graduation rate indicator (50% total weight), 30% of its total weight will result from the 4 year cohort graduation rate, the 5 year cohort graduation rate will account for 15% of the indicator and the 6 year cohort graduation rate will account for the remaining 5% of the accountability indicator.
Title I Part A A.4.iv.c	Graduation Rate Indicator	ESEA requires a State to describe its Graduation Rate indicator.	ISBE indicates that it will include a five-year and a six-year adjusted cohort graduation rate in this indicator. However, because ISBE does not describe how the extended-year adjusted cohort graduation rates will be combined with the four-year adjusted cohort graduation rate within the indicator, ISBE has not fully described its Graduation Rate indicator.	Districts will have the opportunity to participate in the PSAT. Districts will be reimbursed for participation. At this time, growth will receive no weight. As implementation continues, the relationship between the required academic indicators (e.g., EL Proficiency, Academic Attainment, Graduation Rate) and growth will be revisited. In regards to the graduation rate indicator (50% total weight), 30% of its total weight will result from the 4 year cohort graduation rate, the 5 year cohort graduation rate will account for 15% of the indicator and the 6 year cohort graduation rate will account for the remaining 5% of the accountability indicator.
Title I Part A A.4.iv.d	Progress in Achieving English Language Proficiency Indicator	ESEA also requires a State to establish and describe a Progress in Achieving English Language Proficiency indicator that is the same indicator across all LEAs in the State, is measured by the State's English language proficiency assessment, and is aligned with the State-determined timeline described in the State's progress in achieving English language proficiency long-term goal. The ESEA also requires the State to establish a system of meaningful differentiation on an annual basis that includes all indicators, including Progress in Achieving English Language Proficiency indicator. Consistent with the April 2017, Dear Colleague Letter, each State must fully implement its accountability system, including all required indicators, to identify schools by the beginning of the 2018-2019 school year.	ISBE indicates that it is continuing to develop its Progress in Achieving English Language Proficiency indicator. It appears that ISBE's proposed timeline for fully implementing its accountability system does not meet these requirements.	The progress goals for EL students reflect the Illinois State Board Education's approved statewide goals. At the time of Board approval, however, ISBE had yet to receive scores from the 2017 administration of ACCESS 2.0. ACCESS 2.0, administered for the first time in 2017, was revised to more accurately align with the rigorous college and career ready standards students in Illinois are required to meet. Moreover, since this was the first administration of the revised ACCESS assessment, ISBE neither had the scores from the 2017 administration nor a newly adopted EL proficiency standard in order to include in the May 2017 submission. As such, these progress measures and goals will be revisited and amended by the Illinois State Board of Education once three years of data is available. ISBE has identified a 90% target goal for percentage of EL students on track by 2032. As a result of the 2017 administration the new baseline based upon the ACCESS 2.0 is 22.1 percent of EL Students Making on-target Annual Progress towards proficiency.

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Title I Part A A.4.iv.e	School Quality or Success Indicator - Consistently Underperforming Subgroups	ESEA requires that each School Quality or Student Success indicator allow for meaningful differentiation in school performance and be valid, reliable, comparable, and used statewide in all schools.	ISBE describes as a School Quality or Student Success indicator a Climate Survey indicator that will utilize the "5 Essentials" survey. In its State plan, ISBE notes that, at this time, an indicator that measures the results of the 5 Essentials survey does not meet the statutory requirements for a School Quality or Student Success indicator as it cannot be disaggregated by student demographic group and completing the survey is not required annually. Therefore, ISBE proposes to include in this indicator, at this time, only the participation rate on the 5 Essentials survey. ISBE also notes that Illinois requires LEAs to use the 5 Essentials survey or an alternate survey selected by the State Superintendent. Based on the information ISBE has provided in its State plan, it is unclear if participation in the 5 Essentials survey meets the statutory requirements.	At this time, Illinois uses the 5Essentials Survey and three alternative surveys that, with additional modification, will meet the technical criteria for inclusion as an indicator. Initially, participation rate on the climate survey will be used for the purposes of accountability.
Title I Part A A.4.vi.a	Comprehensive Support and Improvement Schools- Lowest Performing	ESEA requires a State to describe a methodology for identifying low-performing schools for comprehensive support and improvement that considers performance on all indicators.	Because ISBE does not provide the year in which the State will first identify such schools, it is unclear whether ISBE meets the requirement, consistent with the April 2017 Dear Colleague letter, for a State to identify such schools by the beginning of the 2018-2019 school year.	Clarified that schools will be identified prior to the beginning of the 2018-2019 school year.
Title I Part A A.4.vi.e	Targeted Support and Improvement Schools- "Consistently Underperforming" Subgroups	ESEA requires that a State describe its methodology to identify schools with one or more "consistently underperforming" subgroups of students that considers all subgroups of students and all indicators in the statewide system of annual meaningful differentiation.	ISBE indicates that it will identify schools with "consistently underperforming" subgroups by looking only at participation rate, performance of the former English learner subgroup, and performance of former students with disabilities.	In addition to participation rate, former EL, and former SPED, ISBE has included the following: <ol style="list-style-type: none"> 1. Using the accountability system, the overall performance of each student demographic group within a school, on all indicators in the accountability system, will be calculated to determine a summative rating comparable to that of the school's all-student group. 2. Schools with one or more student demographic groups that falls within the lowest Tier of performance for three or more consecutive years, regardless of the schools summative rating, will be identified as eligible for Targeted support and improvement. 3. Additionally, any school that has failed to meet the 95 percent assessment threshold for all students or for one or more student demographic groups for three consecutive years in a row will be identified and notified of their eligibility.

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Title I Part A A.4.vi.e	Targeted Support and Improvement Schools- "Consistently Underperforming" Subgroups		It is also unclear whether ISBE meets the statutory requirements for identification of schools with consistently underperforming subgroups because it does not include a definition of "consistently underperforming."	Added text that defined consistently underperforming as, " Schools with one or more student demographic groups that falls within the lowest 10% of performance for three or more consecutive years, regardless of the schools summative rating, will be identified as eligible for Targeted support and improvement.
Title I Part A A.4.vi.f	Targeted Support and Improvement Schools- Additional Targeted Support	The ESEA requires a State to describe its methodology to identify schools in which the performance of any subgroup of students, on its own, would lead to identification under ESEA section III1(c)(4)(D)(i)(I) using the State's methodology under ESEA section III(c)(4)(D) (i.e., "Additional Targeted Support" schools). Such methodology must include identifying these schools either from among all public schools in the State, including both Title I and non-Title I schools, or from among the schools identified as schools with one or more consistently underperforming subgroups.	ISBE indicates that it will identify Additional Targeted Support schools only from among the lowest performing five percent of Title I schools and schools with a four-year graduation rate of less than 67 percent that have not already been identified as the lowest-performing five percent of schools.	ISBE will identify schools eligible for Comprehensive supports and improvement. The performance level of the highest performing school eligible for Comprehensive supports and improvements will determine the upper threshold of performance of the "all student group" of the lowest-performing 5% of schools. Next, from the remaining pool of all public schools in Illinois, including Title I and non-Title I schools, that have not already been identified as eligible for Comprehensive support and improvement, those schools that have one or more student demographic groups whose performance is on par with the performance of the "all students " group identified in step one will be notified they are eligible for additional targeted supports and services and should implement targeted improvement plans.
Title I Part A A.5	Disproportionate Rates of Access to Educators	ESEA requires each State to describe the extent, if any, that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, which may include the State definition of ineffective, out-of-field, and inexperienced teachers.	ISBE indicates that it would report by October 2017 the statewide rates using school-level data for the differences in the rate in which low income and non-low income students and minority/non-minority students are taught by ineffective, out-of-field, and inexperienced teachers.	ISBE requested an extension for the submission of this data until October 31, 2017.
A.5	Disproportionate Rates of Access to Educators	The ESEA also requires a State describe the measures that it will use to evaluate and publicly report its progress with respect to how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers.	The comments were limited to the legal requirements shared in ESSA Legal Reference	ISBE provided the web address where this information will be located.

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Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the planning of its program must include: How it will address the identified unique educational needs of migratory children through the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language for how the unique educational needs of migratory children are met through planning of programming.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the planning of its program must include: How it is joint planning among local, State, and Federal education programs including language instruction educational programs under Part A of Title III.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language for how the unique educational needs of migratory children are met through joint planning of local, state, and federal programs includes language instruction.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the planning of its program must include: How it is planning the integration of services available under Title I, Part C with services provided by those other programs.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language for how planning for the unique educational needs of migratory children includes the integration of services available under TI Part C with services provided by those other programs..
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the planning of its program must include: How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language describing the planning of programming that meets the needs of preschool migratory children, children and migratory children who have dropped out of school.

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Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the implementation of its program must include: How it will implement the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs and the integration of those services available under Title I, Part C with services provided by those other programs.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language describing the implementation of programming that provides the full range of services available for migratory children from local, state, and federal educational programs and includes the integration of services available under TI Part C with services provided by those other programs.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the implementation of its program must include: How it will implement joint planning among local, State, and Federal education programs including language instruction educational programs under Part A of Title III.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language describing how joint planning of local, state, and federal programs includes language instruction occurs.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the implementation of its program must include: How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying language describing the implementation of programming that meets the needs of preschool migratory children, children and migratory children who have dropped out of school.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the evaluation of its program must include: How it will evaluate the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs and the integration of those service against measurable program objectives and outcomes.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying information on the evaluation of the Migrant Education which includes evaluation of: the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs and the integration of those service against measurable program objectives and outcomes.

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Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the evaluation of its program must include: How it will evaluate the joint planning among local, State, and Federal programs including language instruction educational programs under Part A of Title III.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying information of the evaluation of the Migrant Education program which includes evaluation of: the joint planning among local, State, and Federal programs including language instruction educational programs under Part A of Title III.
Title I Part C: B1	Supporting the Needs of Migratory Children	The ESEA requires that ISBE's description of the evaluation of its program must include: How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school.	The comments were limited to the legal requirements shared in ESSA Legal Reference	Included clarifying information of the evaluation of the Migrant Education program which included evaluation of: How it will address the unique needs of preschool migratory children and migratory children who have dropped out of school are addressed.
Title I Part D: C.1	Transitions Between Correctional facilities and Local Programs	The ESEA requires a plan for assisting in the transition of children and youth from locally operated programs to correctional facilities.	ISBE includes a plan for assisting in the transition of children and youth from correctional facilities to locally operated programs, it does not include a plan for assisting in the transition of children and youth between locally operated programs and correctional facilities (i.e., the transition from correctional facilities to locally operated programs as well as the transition from locally operated programs to correctional facilities).	Included clarifying information on the transition of children and youth from correctional facilities to locally operated programs.
Title I Part D: C.2	Program Objectives and Outcomes	The ESEA requires that each SEA establish program objectives and outcomes that can be used to assess the effectiveness of the Title I, Part D program in improving the academic, career, and technical skills of children in the program.	It is not clear how two of the three targets that the plan identifies (i.e., improving services and providing services) and the performance indicators will be used to quantitatively assess the effectiveness of the Title I, Part D program in improving the career and technical skills of the children in the program.	Included information on performance measures and process for the collection of data to ascertain efficacy of performance measures.

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Title IV Part A F.1.	Use of Funds	The ESEA requires ISBE to (1) provide a specific description of the State-level activities the ISBE will undertake now that it is aware of its 2017 Title IV, Part A, subpart 1 allocation, and (2) clarify that it will use for these activities the funds remaining after the State has reserved at least 95 percent for LEA subgrants and no more than one percent for state administrative costs.	The State plan identifies State-level activities it is "considering" under Title IV, Part A, Subpart 1, but it is not clear that these are the activities that the State will implement.	Included information that identified the programs that Illinois will implement with its state set aside dollars, including: safe and healthy schools, innovative use of technology in the schools, and family engagement.
Title IV Part A F.1.	Use of Funds		The State also refers to using its "5 percent administrative set-aside from the Title IV allocation," which is inconsistent with the statute (section 41 04(a)), which only allows for up to 1 percent for administration and requires clarification.	Clarified how dollars will be used for state programming (see above) and administration.
Title IV Part A F.2.	Awarding Subgrants	The Consolidated Appropriations Act, 2017 (Pub. L 115-31) provides States with a new option of awarding the Title IV, Part A subgrants to LEAs competitively	Please consider whether ISBE wishes to revise this response in light of this new flexibility.	ISBE determined to ensure that each school receives no less than 10k through TIV, A.
Title IV Part B 0.2	21st Century Community Learning Centers- Awarding Subgrants	The ESEA requires a State to provide information about: 1) how it will ensure that proposed community learning centers will target their activities to students' academic needs; and 2) how it will implement a rigorous peer review process.	The ISBE states it will use peer reviewers to award subgrants on a competitive basis, but does not include the procedures it will use to ensure that community learning centers will help participating students meet challenging State and local academic standards.	Included language clarifying the procedures used to ensure community learning centers support children in meeting challenging state and local academic standards.

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Title VII Subtitle B 1.2	McKinney-Vento Homeless - Dispute Resolution	The McKinney-Vento Act requires a State to include information about how the procedures will result in the prompt resolution of disputes.	The State plan describes procedures for the resolution of disputes regarding educational placement with references to applicable State code. The plan does not, however, provide procedural time lines or any other information that indicates that these procedures will result in the prompt resolution of those disputes.	Included additional information on and timeline for the dispute resolution process.
Title VII Subtitle B 1.4ii	McKinney-Vento Homeless - Access to Services	The McKinney-Vento Act requires a State to include procedures that ensure that homeless youth and youths separated from public schools are afforded equal access to appropriate secondary education and support services, including removing barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school in accordance with State, local, and school policies.	The State plan does not include any procedures that ensure that homeless youth and youths separated from public schools are afforded equal access to appropriate secondary education and support services, including removing barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school in accordance with State, local, and school policies.	Included additional information on the procedures that ensure homeless youth and youths separated from the public schools are afforded equal access to appropriate services (e.g., secondary education, supplemental services, receipt of credit...).
Title VII Subtitle B 1.4iii	McKinney-Vento Homeless - Access to Services	The McKinney-Vento Act requires a State to describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels.	While the State plan references the legal requirement to remove barriers to homeless children and youth accessing academic and extracurricular activities. it does not describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels.	Includes additional information on the procedures to ensure that homeless children and youth do not face barriers to educational programming (e.g., CTE, AP, summer schools).
Title VII Subtitle B 1.5	McKinney-Vento Homeless - Strategies to Address Other Problems	The McKinney- Vento Act requires a State to provide strategies to address problems resulting from enrollment delays that are caused by-(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements.	While the State plan provides a strategy to address problems resulting from enrollment delays that are caused by uniform or dress code requirements, the State plan does not provide strategies to address problems resulting from enrollment delays that are caused by-(i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues.	Includes strategies resulting from enrollment delays.

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Title VII Subtitle B 1.6	McKinney-Vento Homeless - Policies to Remove Barriers	The McKinney- Vento Act requires a State to demonstrate how SEAs and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the enrollment and retention of homeless children and youth in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.	While the State plan demonstrates that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, the State plan does not demonstrate that the SEA and LEAs have developed, and shall review and revise; policies to remove barriers to the enrollment and retention of homeless children and youth, including barriers to enrollment due to outstanding fees or fines, or absences.	Includes information on the policies to remove barriers to enrollment.
GEPA 427	GEPA	Section 427 of the General Education Provisions Act requires a State to provide a description of the steps it will take to ensure equitable access to, and participation in, the programs included in its State plan for students, teachers, and program beneficiaries with special needs.	This is not addressed in ISBE's plan	The following information was included on Page 4 of the March 15, 2017 ESSA State Plan for Illinois: <i>Section 427 GEPA Statement The Illinois State Board of Education (ISBE) is the agency responsible for state federal funds administered under the Elementary and Secondary Education Act as reauthorized by the Every Student Succeeds Act (ESSA). ISBE requires each applicant for federal funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. ISBE ensures that all ESSA programs are a part of a State-wide system that supports the whole child and provides an environment free from discrimination and harassment based upon gender, race, national origin, color, disability or age. ISBE will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all teachers, families and students with special needs.</i>