



January 31, 2022

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

Dear Mr. Rooney,

This letter serves as Illinois' official request to amend the Illinois Every Student Succeeds Act State Plan. This amendment contains two types of changes – changes related to the accountability system on account of the impact of the COVID-19 pandemic on instruction and procedural changes (mostly non-substantive) to reflect current practice. The State Plan was originally approved in August 2017 and further amended in 2019 to remove indicators “not yet ready for implementation.”

Illinois returned to in-person instruction in the 2021-22 school year, but three types of considerations prevented it from implementing its accountability system as was previously approved in 2019:

1. Technical considerations (e.g., missing 2021 prior scores or changes to calculation methodology)
2. Alignment considerations (e.g., targets or scoring rules misaligned to expectations in 2022)
3. Impact considerations (Is a school being identified for reasons that warrant investing in a four-year cycle of continuous improvement? Or is the system detecting issues that will resolve without intervention?)

A full description of the proposed accountability changes and other substantive edits are included in an Executive Summary (Attachment A).

Stakeholder Engagement

ISBE began the process of engaging stakeholders regarding this topic in October 2021. Early engagement focused on specific indicators with stakeholders who possessed specific subject matter expertise. Issues with the current accountability system indicators were identified, and multiple mitigation options were considered. This analysis served as the foundation to develop six progressive, live, open-forum webinars¹. A redlined version of the proposed changes was published for public comment on Dec. 15, 2021 (Attachment B) along with a page-by-page guide (Attachment C) and summary of the accountability changes. The public comment period remained open for 30 days, until Jan. 14, 2022. Opportunity for public comment was communicated via [ISBE's Weekly](#)

¹ Webinars occurred on Nov. 22, 2021; Nov. 30, 2021; Dec. 20, 2021; Dec. 21, 2021; Jan. 10, 2022; and Jan. 11, 2022.

[Message](#) and an announcement tile on the agency home page. Comments could be submitted via a short online form, email, or letter.

A total of 42 survey responses were received. There were more public comments from teachers, parents or guardians, and community members than from school and district administrators and staff. Participants in the open forum webinars were asked questions similar to those in the survey via an interactive polling tool. A full analysis of both survey and webinar responses, including written comments, can be found in Attachment D.

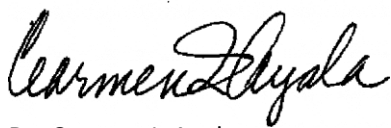
In brief, the majority of respondents supported the proposed changes to the accountability system and also the other proposed changes to the plan. Support was strongest for the proposal to replace science proficiency with science participation and to allow all English Learners to add another year to their timeline. Support for other proposals ranged between 50 percent and 76.7 percent. Chronic absenteeism was the one exception to this trend, with survey respondents opposing the proposed changes by a very slight margin. The proposed chronic absenteeism changes received greater support from webinar participants. After careful deliberation, ISBE has maintained the full set of proposed accountability changes.

In addition to the webinars and surveys, ISBE received four written letters of comment—from Foresight Law + Policy, the Illinois Federation of Teachers-Chicago Teachers Union (IFT-CTU), Advance Illinois, and the Illinois Balanced Accountability Measure (IBAM) Committee. The IBAM Committee and Advance Illinois expressed general support for the changes that were proposed. Foresight Law + Policy advocated potential changes to chronic absenteeism, while the IFT-CTU called for “a federal rethinking of accountability as COVID continues to rage in our communities.”

The Illinois State Board of Education approved the amendment on Jan. 19, and consulted with the Governor’s Office on Jan. 21. There were no objections to the amendment presented during consultation.

The final changes to the amendment are reflected in the attached redlined version of our State Plan. You may find this version posted in draft form at www.isbe.net/essa. We appreciate your consideration of this amendment request.

Sincerely,

A handwritten signature in black ink that reads "Carmen I. Ayala". The signature is written in a cursive, flowing style.

Dr. Carmen I. Ayala
State Superintendent of Education