



Illinois State Board of Education

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February 11, 2021

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Subject: Request to Release an Expedited Waiver of Assessment and Accountability Requirements

Enclosed: (1) [Letter Signed by 661 Illinois School District Superintendents](#)
(2) [Letter Signed by Illinois Teacher and Management Associations](#)

Dear Acting Secretary of Education Phil Rosenfelt and Acting Assistant Secretary Ian Rosenblum:

The Illinois State Board of Education urges the U.S. Department of Education, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965, as amended, to offer states the option to waive the following assessment and concomitant accountability and reporting requirements. Specifically, the Department should release an expedited waiver application for:

- assessment requirements in section 1111(b)(2) covering all required assessments in school year 2020-2021;
- the requirement that a state annually meaningfully differentiate all public schools and to identify schools for comprehensive and targeted support and improvement, as required in sections 1111(c)(4) and 1111(d)(2)(C)-(D); and
- those report card provisions related to assessments and accountability in section 1111(h) that would be based on data from the 2020-2021 school year.

Because so many of our students have been separated from their schools since March, we believe that bringing students back in-person only to immediately begin state testing will have a detrimental effect on the goals of supporting their social-emotional wellbeing, mental health, and reconnection with the school community. While 77 percent of our 852 school districts are offering some in-person instruction, data show that more than a million students are still learning in fully remote environments and have been since March. Fewer than 200 Illinois school districts serving less than 200,000 students are currently able to provide fully in-person instruction to all

students. Illinois students need their school and district administrators focused on resuming in-person instruction for the purposes of providing trauma-informed supports, increasing the quality of instruction, and rebuilding relationships between students and teachers. The administration of state assessments would take away from these critical endeavors that are foundational to the recovery of our educational systems.

The decision to submit this request is the result of rich collaboration with a wide variety of individuals with a deep commitment to public education and the belief in its power transform lives. Over the past several months, the Illinois State Board of Education has heard from superintendents, building principals, classroom teachers, parents, and students regarding their thoughts and concerns on federally required assessments for the 2020-2021 school year. Enclosed, please find a joint statement from the leaders of our two state teachers unions and of our principal and district administrator associations, as well as a joint statement signed by 661 individual Illinois school district superintendents.

Our request is further premised upon the following:

- Illinois educators understand and believe in the importance of assessment results, but the likely variability in participation across the state will limit the comparability and usefulness of the data at both the individual student and student group levels. The potential yet diminished benefits of using incomplete state assessment data as a means of understanding the scope of learning loss that may have occurred as a result of the pandemic do not outweigh the significant burden that the administration of state assessments would incur on our students, families, teachers, and administrators.
- After hearing the concerns of district and school leaders, teachers, families, and students, ISBE delayed its testing windows in order to provide as much flexibility for administration under socially distanced conditions. Currently, and in addition to supporting the academic, social, and emotional needs of students, districts are utilizing time and resources to ensure transportation and safe logistics for testing. This time could be better spent coordinating vaccination administration for educators and the larger community and providing necessary supports for students. Without a clear signal that the Department will permit an assessment waiver, districts will continue to plan for the administration of assessments. This is not the optimal use of their time or resources.

The Illinois State Board of Education firmly believes in the importance of assessment: the practice of collecting evidence about student learning to provide students with feedback and to inform supports and instructional design. Assessment is still critically important to helping students recover from the pandemic. Schools, districts, and teachers can and should continue to conduct formative assessments at the local levels to understand the impact of the pandemic on student learning and provide holistic and individualized supports.

We also believe in accountability as a means of identifying our schools and our students in the greatest need of assistance. We acknowledge that a second year without state assessments will impact our longitudinal data and accountability systems; however, we are confident in our ability

to continue to provide supports to our highest need schools and students and to leverage local data sources to evaluate our progress.

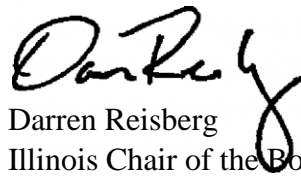
Given these considerations, we assert that it is in the best interest of students and educators for the U.S. Department of Education to release an expedited waiver of assessment and accountability requirements for the 2020-2021 school year.

On behalf of Illinois students and the educators that support them, thank you for considering this request.

Sincerely,



Dr. Carmen I. Ayala
Illinois State Superintendent of Education



Darren Reisberg
Illinois Chair of the Board