## Illinois State Board of Education

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**Darren Reisberg** *Chair of the Board* 

**Dr. Carmen I. Ayala**State Superintendent of Education

January 27, 2021

Office of Elementary and Secondary Education Assistant Secretary Frank Brogan 400 Maryland Ave., SW Washington, DC 20202 Email: oese@ed.gov

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**Subject**: Proposed Waiver to Illinois' Consolidated State Plan Under the Every Student Succeeds Act Regarding the Identification of Consistently Targeted Schools in 2021

Dear Assistant Secretary Brogan,

Illinois requests a limited waiver of the requirements of Section 1111(d)(2)(A) of the Every Student Succeeds Act (ESSA). These are related to the annual identification of schools determined to be consistently Targeted for school year 2020-21 in accordance with Section 8401(a), (20 U.S.C. 7861). Additionally, Illinois requests an addendum to its ESSA Consolidated State Plan due to the COVID-19 national emergency that will amend how it identifies schools for Comprehensive and additional Targeted support.

A consistently Targeted school in Illinois is one in which one or more student demographic groups falls within the lowest 10 percent of performance statewide based on all indicators within the accountability system for three or more consecutive years or any school that failed to meet the 95 percent assessment threshold for all students or one or more student demographic groups for three consecutive years. Illinois was to begin identifying consistently Targeted schools during SY 2019-20, with the data from SY 2019-20 constituting the third consecutive year of information. This requirement and others for accountability and school identification in Sections 1111(c)(4) and 1111(d)(2)(C)-(D) were waived for SY 2019-20 for all states, including Illinois.

The waivers that Illinois applied for and received due to the COVID-19 pandemic have resulted in the state not having three consecutive years of overall accountability scores with which to identify schools for consistently Targeted status in 2020-21. Abnormalities in student participation and adjustments to the calculation of accountability indicators in 2021 as detailed in Illinois' submitted "Template for Addendum to the ESEA Consolidated State Plan due to the COVID-19 National Emergency under the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act" make it inappropriate to use data and calculations (i.e., student group index scores) from SY 2020-21 as a part of a three-year-trend identification window. Illinois proposes to resume identification of this group in SY 2021-22 using index scores from SY 2017-18, SY 2018-19, and SY 2021-22.

Until new consistently Targeted identifications can be determined, Illinois will continue to provide resources and support to those schools with student groups currently identified for additional Targeted or Comprehensive supports in the same manner as identified in its approved ESSA Consolidated State Plan.

Sincerely,

Dr. Carmen I. Ayala

Illinois State Superintendent of Education