



# Illinois State Board of Education

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**Christopher A. Koch, Ed.D.**  
State Superintendent of Education

January 10, 2014

Deborah Delisle  
Assistant Secretary  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202-6200

**RE: REQUEST TO WAIVE PROHIBITION ON APPROVING AN IDENTIFIED SCHOOL OR LEA AS AN SES PROVIDER**

Dear Assistant Secretary Delisle:

The Illinois State Board of Education (ISBE) and the Chicago Public Schools (CPS) are requesting a two-year waiver of the Title I, Part A regulatory provision that prohibits a State from approving as providers of supplemental educational services (SES) schools identified for improvement, corrective action, or restructuring and local educational agencies (LEAs) identified for improvement of corrective action (34 C.F. R. §200.47(b)(1)(iv)(A), (B)).

Under the law, ISBE may approve as an SES provider only an entity that has demonstrated record of effectiveness in increasing student academic achievement. CPS received a one year waiver of this provision in 2009-10 and began offering services under the name A.I.M High. It has come to our attention that A.I.M High has continued to operate without a waiver from the U.S. Department of Education. ISBE seeks a waiver of this provision for the 2013-14 school year on behalf of Chicago Public Schools, the only district in status currently operating as an SES provider. ISBE further seeks a waiver of this provision for the 2014-15 school year on behalf of Chicago Public Schools and any similarly situated district in status that is approved to serve as an SES provider.

A.I.M High has tutored in both reading and mathematics since 2009. Based on our evaluation of work done in SY2011 (the latest year for which we have final evaluation reports) for students taking the ISAT exam in grades 3-8, A.I.M High's work in mathematics, for example, shows an average improvement for students that exceeds the predicted improvement (Illinois' measure of effectiveness). For students taking the PSAE in grade 11, A.I.M High had 36% of its tutees meet or exceed the standards. In that year, A.I.M High was the second largest provider within Chicago Public Schools (A.I.M High only serves the Chicago school district), providing tutoring services to 2,450 students, or 10.72% of CPS students.

Further, while final enrollment numbers are not yet available for 2013-14, we expect A.I.M High is already offering services to at least 1,500 students. ISBE regrets that it did not realize the LEA had not obtained the necessary waiver, but we collectively wish to remedy this situation immediately for the 2013-14 school year. Not granting this waiver would mean disruption in services for numerous low-income students, due to a technical oversight on our parts.

ISBE has set the following annual measurable objectives (AMOs) in reading and mathematics subjects that are among those covered by SES providers in Illinois for the 2012-13 school year.

<b>YEAR</b>	<b>Reading and Math AMO</b>
2012-13	92.5%
2013-14	100%

ISBE will determine adequate yearly progress (AYP) based on assessments administered in the 2013-14 school year in accordance with the requirements of section 1111(b)(2) of the Elementary and Secondary Education Act of 1965 (ESEA). ISBE believes that, ultimately, allowing CPS to continue serving as an SES provider may help more students within Illinois to reach the State's proficiency objectives.

Prior to submitting this waiver request, ISBE provided all LEAs in the State with notice and a reasonable opportunity to comment on this request. ISBE provided such notice by publicizing the waivers in the weekly Superintendents Bulletin, on January 13, 2014 (see copy of notice available at [www.isbe.net](http://www.isbe.net)). No comments on the waivers were received from LEAs in response to the notice. ISBE has also provided notice and information regarding this waiver request to the public in the manner in which ISBE customarily provides such notice and information to the public by posting information regarding the waiver request on its Web site.

ISBE assures the Department that only those LEAs and schools that meet the State's requirements for SES providers are approved to be on the State's list of approved providers. Only CPS has qualified as an approved provider despite being in status for the 2013-14 school year.

ISBE further assure that, if it is granted the requested waiver, it will submit to the U.S. Department of Education all data the Department may request.

Please feel free to contact Melina Wright at 312-814-2804 or via email at [mewright@isbe.net](mailto:mewright@isbe.net) if you have any questions regarding this request. Thank you for your consideration.

Sincerely,



Christopher A. Koch, Ed.D.  
State Superintendent of Education

