



Illinois State Board of Education

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Chairman

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

July 24, 2012

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

Dear Assistant Secretary Delisle:

I am writing on behalf of the Illinois State Board of Education (ISBE) to request a waiver of section 1111(b)(2)(H) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, to permit ISBE to use the same annual measurable objectives (AMOs) that ISBE used for AYP determinations based on assessments administered in the 2010–2011 school year to make such determinations for the 2011–2012 school year. ISBE believes that allowing Illinois to use the same AMOs for AYP determinations based on assessments administered in the 2011–2012 school year as it used for the 2010–2011 school year will help increase the quality of instruction for students and improve the academic achievement of students by removing the pressure of meeting escalating AMOs so that ISBE and other stakeholders within the State can devote necessary time and resources to planning for the implementation of ESEA flexibility, which ISBE needs additional time to do.

Set forth below in Table are ISBE's current AMOs in reading/language arts and mathematics and the AMOs the ISBE will use if approved for the One-Year AMO Flexibility.

Table 1 ISBE's AMOs for Reading/Language Arts and Mathematics

School Year	Reading/Language Arts		Mathematics	
	AMOs in Accountability Workbook	AMOs under One-Year AMO Flexibility	AMOs in Accountability Workbook	AMOs under One-Year AMO Flexibility
2010 – 2011	85	85	85	85
2011 – 2012	92.5	85	92.5	85
2012 – 2013	92.5	92.5	92.5	92.5
2013 – 2014	100	100	100	100

NOTE: AMOs under the One-Year AMO Flexibility for the 2012–2013 and for the 2013–2014 school year will be the same as in an SEA's approved Accountability Workbook.

Prior to submitting this request, ISBE adopted college- and career-ready content standards in reading/language arts and mathematics that meet the definition of "college- and career-ready standards" in the document titled *ESEA Flexibility*, as ISBE has adopted content standards that are common to a significant number of States. Attached hereto is evidence that ISBE has formally adopted those standards consistent with the State's standards adoption process.

ISBE hereby assures that it will provide student growth data on current students and students taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instruction, consistent with the timelines and definitions required under State Fiscal Stabilization Fund (SFSF) Indicator (b)(2).

Further, ISBE has identified persistent achievement and graduation rate gaps within the State that need to be closed. As evidence of this identification, attached to this letter are tables that set forth Statewide

achievement data, including proficiency rates and achievement gaps, for the “all students” group and identified student subgroups based on the most recent three years of data. ISBE hereby assures that it will report these data publicly by posting the data, in a format that is easily understandable, on its website on a page that is easily accessible by the public.

ISBE further assures that it will take all steps necessary to plan for the implementation of ESEA flexibility and will submit a request for ESEA flexibility. ISBE understands that, if it fails to submit a request for ESEA flexibility or if its request is not approved prior to the time it must make AYP determinations based on assessments administered in the 2012–2013 school year, ISBE will revert to using its currently approved AMOs for the 2012–2013 and the 2013–2014 school years, meaning that all schools and local educational agencies (LEAs) in the State will be held accountable for reaching 100 percent proficiency by 2014.

Also attached is the notice ISBE has sent to LEAs in our State regarding this waiver request and the comments received as a result. Further, we have attached the notice provided to the public through publicizing the request in the weekly Superintendents Bulletin, on July 24, 2012 (see copy of notice available at <http://www.isbe.net/board/archivemessages/archivemessage.htm>), and by sending out an IWAS blast email to all those who work on the NCLB Consolidated State Application which includes Superintendents, Title I Directors and business administrators, and finally, by posting information about the request on the ISBE website http://www.isbe.net/nclb_waivers/default.htm.

No comments on the request were received in response to the notice to date but if any such comments are received by ISBE they will be forwarded to ED.

Please feel free to contact Dr. Monique M. Chism by phone at 217-524-4832 or via e-mail at mchism@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

Attachments: Notice provided to LEAs, notice for public comment, achievement gap data, and LEA comments received