

To: Dr. Carmen Ayala, State Superintendent of Education
Dr. Ernesto Matias, Education Officer
Dr. Jason Helfer, Deputy Instructional Education Officer
Mr. Krish Mohip, Deputy Operational Education Officer
Ms. Rae Clementz, Director of Accountability
Illinois State Board of Education

From: Illinois Balanced Accountability Measure Committee (“IBAMC”)

RE: IBAMC Recommendations Regarding Federal DOE/Accountability Submission

Date: January 8, 2021

Pursuant to statutory authority, the purpose of this letter is to provide recommendations and feedback to the Illinois State Board of Education regarding the overall composition of the Illinois ESSA State Plan, specifically and inclusive of ISBE’s request of temporary and permanent revisions of the State’s approved ESSA Plan to the Federal Department of Education. It is our understanding that the Board will consider action on this item at its January 2021 Board Meeting. We believe it is imperative to submit the following for this Board’s and Administration’s review and consideration.

Purpose

The Illinois Balanced Accountability Measure Committee (“IBAMC”) was created pursuant to House Bill 2683 (P.A. 99-0193) to provide guidance, recommendations and feedback regarding the ESSA State Plan and any additions, modification and revisions thereof. Thus, in accordance with ISBE protocols, the IBAMC met on December 5, 2020, December 17, 2020 and January 5, 2021 to fully analyze and discuss the recommended temporary and permanent revisions of the State’s approved ESSA Plan to be submitted to the federal Department of Education.

Pursuant to statute, the IBAMC consists of ten (10) voting members and one (1) ISBE appointed non-voting member. The voting members are as follows: Sara Boucek, Chair (Illinois Association of School Administrators) (“IASA”), Thomas Bertrand, Vice Chair (Illinois Association of School Boards) (“IASB”), Daniel Booth, Superintendent - Carbondale Elementary School District (Illinois Principals Association), (“IPA”), Jeff Broom, Director of Performance Data and Policy (Chicago Public Schools) (“CPS”), Erin Roche, Principal (Chicago Principal and Administrators Association). Karl Goeke, Teacher McLean Unit 5 Schools (Illinois Education Association) (“IEA”), Kurt Hilgendorf, Policy Advisor (Chicago Teachers Union) (“CTU”), Dr. Mark Klaisner, Executive Director West 40 (Illinois Association of Regional School Superintendents) (“IARSS”), Cathy Mannen, Union Professional Issues Director (Illinois Federation of Teachers) (“IFT”) and

Mary Jane Morris, Director of Teaching and Learning (Illinois Education Association) (“IEA”). Additionally, ISBE appointed Matthew Rodriguez, President, Illinois PTA.

In accordance with its statutory obligation, the IBAMC has analyzed and debated various issues related to the State’s proposed revisions. The end goal upon completion of this analysis was to provide group-wide consensus and recommendation to ISBE regarding said revisions and any subsequent ramifications thereof. However, where consensus was not available, it was important to all members of the IBAMC that explanation and reason be provided. Accordingly, the result is the recommendations and information provided below.

Recommendations

Prior to submitting its recommendations and comments regarding the ISBE’s proposed revisions to the State’s approved ESSA Plan, it is very important to every IBAMC member to reiterate and reaffirm the IBAMC’s original recommendations regarding the ESSA State Plan, as well as the State’s Accountability and/or IAR statewide testing requirement and plan for the 2020-2021 school year. The overwhelming majority of the IBAMC believe to the extent possible that the 2020-2021 accountability and statewide assessments should be waived due to the massive and disparate impact to education delivery due to the COVID-19 worldwide pandemic.¹

Without such waiver opportunity, the IBAMC understands that the State must comply with the federal Department of Education’s accountability requirements in order to receive federal ESSA funding for the 2021-2022 school year. Moreover, the IBAMC fully acknowledges and shares with the Illinois State Board of Education’s desire to protect and secure said funding (which totals approximately \$750,000,000) to the State. This funding is fundamental and crucial to school districts ability to maintain current educational programming.

To that end, if a waiver is rejected by the Department of Education, we offer our support to ISBE’s current proposed permanent and temporary revisions to the State’s approved ESSA Plan as detailed in the “Accountability 2021 Presentation” as found at <https://www.isbe.net/Documents/Accountability-2021-Presentation.pdf>. If the federal Department of Education mandates the State’s accountability and/or state-wide testing obligations, we believe that maximum flexibility should be provided to the State and all Illinois school districts as it relates to State’s accountability formula and designations. We believe and support ISBE’s recommended permanent and temporary revisions to the State’s approved ESSA plan achieve said flexibility to the full extent as currently provided by the federal Department of Education.

The one area to which IBAMC would like ISBE to consider a deviation to the current

¹ CPS supports ISBE's continued planning for the administration of spring assessments, if viable.

administration's recommendations as detailed in the "Accountability 2021 Presentation" relates to summative designations. The current ISBE recommendation is to contextualize the summative designation with a trend signifier. We strongly recommend that ISBE not move in this direction. Historically, adding trend arrows, lines, designations has been met with strong resistance from the field. It has proven to be destructive, divisive and confusing. At this time, we do not see the benefit given the potential downside. We would respectfully request that if summative designations are necessary, the designations as currently defined in Board policy (i.e. Exemplary, Commendable, Underperforming, and Lowest Performing) be maintained. If anything, we would respectfully request that school districts have the ability to add context to any designation so that school districts maintain the ability to own and "tell their story."

Additional Recommendation

Additionally, IBAMC recommends that ISBE add language to all educational reporting for the 2020-2021 school year that denotes the impact of COVID-19 on learning conditions resulting in widely inconsistent student performance as measured by existing indicators.

Conclusion

Thank you for your review and consideration of the abovementioned support and recommendations by the IBAMC. Furthermore, thank you for your attention and dedicated work on behalf of all school districts. If upon your review, questions and/or concerns should arise, please do not hesitate to contact us. We look forward to the opportunity to continue to collaborate with ISBE in this very important work.