

To: Dr. Carmen Ayala, State Superintendent of Education
Mr. Darren Reisberg, Chairman of the Illinois State
Board 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 2022 ESSA Accountability Amendment

Date: January 14, 2022

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 2022 Amendment 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 2022 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 November 8, 2021, December 17, 2021 and January 10, 2022 to fully analyze and discuss the recommended 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. The voting members are as follows: Cathy Mannen, Chair (Illinois Federation of Teachers) (“IFT”), Thomas Bertrand, Vice Chair (Illinois Association of School Boards) (“IASB”), Kurt Hilgendorf, Policy Advisor (Chicago Teachers Union) (“CTU”), Mary Jane Morris, Director of Teaching and Learning (Illinois Education Association) (“IEA”), Karl Goeke, Teacher McLean Unit 5 Schools (Illinois Education Association) (“IEA”), Jeff Broom, Director of Performance Data and Policy (Chicago Public Schools) (“CPS”), Erin Roche, Principal (Chicago Principal and Administrators Association). Dr. Mark Klaisner, Executive Director West 40 (Illinois Association of Regional School Superintendents) (“IARSS”), Dr. Daniel Krause, Principal – Willowbrook High School

(Illinois Principals Association) (“IPA”), and Chad Watkins, Associate Director/Legal Counsel (Illinois Association of School Administrators) (“IASA”).

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.

Context

Across multiple meetings, the IBAMC has discussed at length the impact of the COVID-19 pandemic on students, families, educators, schools, and communities across the state. It cannot be overstated that the 21-22 academic year is the third pandemic school year, and all signs point toward a fourth pandemic school year in 2022-23. The pandemic continues to disproportionately impact our most vulnerable children and their families and has exacerbated pre-pandemic issues of equity related to structural racism, poverty, and segregation. School staff have been rightly focused on student well-being, health and safety, and trauma associated with the pandemic. Educators have been finding ways to support students to heal and build protective factors from the trauma and grief they have experienced throughout the pandemic.

These interventions come at a cost. Staff fatigue and burnout remain a significant concern. The system, the students and their families, and the educators and administrators who serve them are all under incredible stress. Asking those who are most directly impacted by school accountability decisions to do more at this moment in time (i.e., by additional accountability requirements or data collection) would be burdensome and unfair. IBAMC members have also discussed the importance of the accountability system acknowledging and adapting to how students, teachers, and teaching and learning have changed as a result of the pandemic. It is within this context that the IBAMC considered its response to the 2022 state accountability amendment.

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 outlined in its letter submitted on January 26, 2017, including the recommendation to minimize the weight on standardized testing, and increase weight on other factors. 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 2022-23 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 \$1 billion) to the State. This funding is fundamental and crucial to school districts' ability to maintain current educational programming. In considering ISBE's proposals for the 2022 state ESSA plan amendment, the IBAMC believes maximum flexibility as allowed by the federal Department of Education should be provided to the State and all Illinois school districts to the full extent as it relates to the State's accountability formula and designations.

The committee supports the 2022 ESSA State Plan revisions as put forth by the agency. These proposed revisions, in consideration of the impact of the COVID-19 pandemic on schools across the state, provide some relief and needed flexibility to schools. For example, those parts of the amendment that provide more time (i.e., giving English Language Learners more time and delaying the implementation of all meta-indicators in order to validate the data related to those indicators), replacing science proficiency with participation rates, and flexibility with calculating the student growth indicator. For a variety of pandemic-related reasons, student attendance has fluctuated widely. The proposal to provide options that award bonus points for chronic absenteeism addresses the flexibility schools need during this time to connect with families about the importance of school attendance while also balancing the responsibility schools hold to maintain a safe and healthy environment for students and staff while they continue to respond to an ever-changing, highly contagious virus.

Additional Recommendation

Additionally, IBAMC recommends that ISBE add language to all educational reporting for the 2021-22 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.