

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

Illinois



U.S. Department of Education
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Illinois State Board of Education

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PREFACE FOR READERS:

Cancelling assessments in 2020 will impact the calculation of accountability designation in 2021 (i.e., growth calculation when missing a prior score).

In October 2020, the U.S. Department of Education (ED) provided information on potential regarding the determinations of accountability designations in 2021. To plan for the future, ISBE intends to take advantage of the allowable flexibilities offered by ED. The first step in that process is submitting the following proposed addendum to our approved ESSA accountability plan. Submitting this addendum is formal request to modify our accountability system in 2021. It is not a formal amendment.

The purpose of the proposed adjustments is to postpone identification of new schools for comprehensive supports, targeted supports, and supports to address chronically underperforming groups so any new identifications can be made based on more traditional accountability structures (i.e. the previous calculation and scoring rules) and data in 2022.

The remainder of this document describes changes to the accountability system - its indicators and how they are calculated and scored - that are permissible within the addendum. These proposed changes are non-binding, and ***do not preclude Illinois from submitting a formal amendment or requesting greater flexibility if it is offered in the future.***

The proposed modifications :

1. Mitigate the possible impact to performance introduced by COVID-19,
2. Recognize school improvement,
3. Report school performance under the modified accountability system to signal how a school might perform under more traditional accountability structures, and
4. Provide multiple options in response to current unknowns (e.g. having two plans for scoring growth, one using 2021 data if it can be validated and a second plan if 2021 data cannot be used because it violates assumptions in the methodology).

This is achieved through **6 strategies**, applied to indicators identified as permissible within the addendum:

- Extending timelines for achievement of goals wherever possible¹. Functionally, this moves the long-term goal date for Illinois from 2032 to 2033, makes the 2020 interim targets the new 2021 targets, and allows students who were ELs in 2020 one additional year to reach proficiency.
- Maintaining all the current indicators and their current weights, so that 2021 designations signal, to the greatest extent possible, how a school may perform in 2022.
- Using three-year composite averages of 2018, 2019, and 2021 data wherever possible.
- Using 2019 performance levels for indicators *or* adjusting what is measured where it is not possible to create a composite average (e.g., rather than dropping the indicator entirely, for instance, ISBE could exchange proficiency rates for participation rates for science, which is not a required academic indicator. It could not do this for ELA or math, which are required).
- Using the higher of 2021 non-composite performance or the 3-year composite/2019 prior performance so that schools receive credit for any improvements.
- Adjusting scoring formulas to reflect the actual 2021 distributions of performance (e.g., changing the scoring range for Freshmen on Track from 100% earning 100 points and 67% earning 0 points to a range that reflects actual 2021 performance).

Note that the proposed changes to calculation or scoring methods are limited in scope and will apply only to designations issued in 2021.

We welcome your input. If you have questions about the proposed adjustments, please email our Accountability Director, Rae Clementz at aclement@isbe.net. To submit a formal public comment, please email essa@isbe.net.

¹ ISBE is proposing 1-year extensions to timelines for achievement of ELA and math proficiency targets, English Learner (EL) proficiency targets, and graduation rate targets, which can remain permanently.

Addendum to the ESEA Consolidated State Plan

Introduction

To address the extraordinary circumstances of extended and widespread closures of schools due to the novel coronavirus (COVID-19) pandemic, on March 20, 2020, the U.S. Department of Education (Department) invited, pursuant to section 8401(b) of the Elementary and Secondary Education Act of 1965 (ESEA), each State educational agency (SEA) to request a waiver, for the 2019-2020 school year, of assessment, accountability and school identification, and certain related reporting requirements. The Department approved waivers for 53 SEAs (including the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, and the Bureau of Indian Education) for the following assessment, accountability and school identification, and reporting requirements for the 2019-2020 school year to address the COVID-19 National Emergency (“COVID-19 waivers”):

- Assessment requirements in section 1111(b)(2) for the 2019-2020 school year.
- Accountability and school identification requirements in sections 1111(c)(4) and 1111(d)(2)(C)-(D) that are based on data from the 2019-2020 school year.
- Report card provisions related to assessments and accountability in section 1111(h) based on data from the 2019-2020 school year. These include:
 - Section 1111(h)(1)(C)(i) (accountability system description).
 - Section 1111(h)(1)(C)(ii) (assessment results).
 - Section 1111(h)(1)(C)(iii)(I) (other academic indicator results).
 - Section 1111(h)(1)(C)(iv) (English language proficiency results).
 - Section 1111(h)(1)(C)(v) (school quality or student success indicator results).
 - Section 1111(h)(1)(C)(vi) (progress toward meeting long-term goals and measurements of interim progress).
 - Section 1111(h)(1)(C)(vii) (percentage of students assessed and not assessed).
 - Section 1111(h)(1)(C)(xi) (number and percentage of students with the most significant cognitive disabilities taking an alternate assessment).
 - Section 1111(h)(2)(C) with respect to all waived requirements in section 1111(h)(1)(C) as well as 1111(h)(2)(C)(i)-(ii) (information showing how students in a local educational agency (LEA) and each school, respectively, achieved on the academic assessments compared to students in the State and LEA).

The waiving of these requirements, as well as the continued implications of COVID-19, impact how each SEA will implement its ESEA consolidated State plan in the 2020-2021 school year. Thus, the Department has created a streamlined process, this COVID-19 State Plan Addendum, for an SEA to amend its ESEA consolidated State plan to account for one-year changes (e.g., changes to how the SEA will hold schools accountable for the 2020-2021 school year) and two specific long-term changes: (1) shifting forward timelines by one year for identifying schools and (2) shifting forward timelines by one year for meeting measurements of interim progress (MIPs) and long-term goals due to COVID-19. All other amendment requests must be made using the regular State plan amendment process outlined in the letter sent to SEAs on October 24, 2019 (see <https://oese.ed.gov/files/2019/10/csso-letter.pdf>).

All amendment requests must be submitted by **February 1, 2021**, in order for the Department to determine whether a requested amendment complies with all applicable statutory and regulatory requirements in time for your State to implement changes to its accountability system for determinations in fall 2021 based on data from the 2020-2021 school year (e.g., identification of schools for comprehensive, targeted, or additional targeted support and improvement for the 2021-2022 school year).

The Department has also issued a “Frequently Asked Questions: Impact of COVID-19 on Accountability Systems Required under the Elementary and Secondary Education Act of 1965 (ESEA)” document which includes information on the general amendment process, accountability systems, school identification, and report card requirements. The document is available at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/>.

For any questions or additional information please contact the U.S. Department of Education at oese.titlei-a@ed.gov.

Submitting Amendments to the ESEA Consolidated State Plan

COVID-19 State Plan Addendum Process

If an SEA proposes to amend its ESEA consolidated State plan due to COVID-19 for the 2020-2021 school year only (e.g., for accountability determinations in the fall of 2021 based on data from the 2020-2021 school year) using the streamlined ESEA consolidated State plan addendum process, it must submit the following:

1. A COVID-19 State Plan Addendum, using this template, to the approved ESEA consolidated State plan that reflects all proposed changes due to COVID-19;
2. The signature of the chief State school officer or authorized representative; and
3. A description of how the State provided the public a reasonable opportunity to comment on the plan.

Prior to submitting an amendment to the Department, the SEA must consult with the Governor, afford a reasonable opportunity for public comment, and consider such comments consistent with the consolidated assurances the State submitted in June 2017 under ESEA section 8304.

In order to ensure transparency, the Department will post each approved addendum along with the currently approved version of the ESEA consolidated State plan at <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/>.

If the SEA chooses to submit a State plan addendum to propose the two specific longer-term changes that can be proposed through the addendum process (i.e., shifting forward timelines for identifying schools or meeting MIPS and/or long-term goals), the SEA must submit the items listed above and also submit, at a later date, an updated State plan that incorporates those changes.

Redlined ESEA Consolidated State Plan Process

If an SEA proposes to amend its ESEA consolidated State plan to make changes that are not included in this template, it must follow the process the Department has used for the past two years. As indicated in a letter sent to SEAs on October 24, 2019 (see <https://oese.ed.gov/files/2019/10/csso-letter.pdf>), prior to submitting an amendment to the Department, the SEA must consult with the Governor, afford a reasonable opportunity for public comment, and consider such comments consistent with the consolidated assurances the State submitted in June 2017 under ESEA section 8304. An SEA submitting an amendment under the regular process must submit to the Department the following:

1. A redlined version of the approved ESEA consolidated State plan that reflects all proposed changes;

2. A cover letter describing the proposed changes;
3. The signature of the chief State school officer or authorized representative; and
4. A description of how the State provided the public a reasonable opportunity to comment on the plan.

DRAFT

Cover Page

Authorized SEA Representative (Printed Name)	
Signature of Authorized SEA Representative	Date:

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Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)

Statewide Accountability System and School Support and Improvement Activities (ESEA section 1111(c) and (d)) (corresponds with A.4 in the revised State plan template):

- a. Establishment of Long-Term Goals. (ESEA section 1111(c)(4)(A)) (corresponds with A.4.iii in the revised State plan template) Due to the COVID-19 waivers, the State is revising its long-term goal(s) and measurement(s) of interim progress by shifting the timeline forward by one year for:
 1. Academic Achievement. If a State is proposing to shift the timeline forward by a year, check the box.
 2. Graduation Rate. If a State is proposing to shift the timeline forward by a year, check the box.
 3. Progress in Achieving English Language Proficiency (ELP). If a State is proposing to shift the timeline forward by a year, check the box.

- b. Indicators. (ESEA section 1111(c)(4)(B)) (corresponds with A.4.iv in the revised State plan template) Due to COVID-19, the State is revising one or more of its indicators for the 2020-2021 school year to be used in accountability determinations in fall 2021. These revisions are limited to the 2020-2021 school year.
 1. Academic Achievement Indicator. Describe the Academic Achievement indicator for the 2020-2021 school year.

Illinois is adjusting its timeline for long term goals and measures of interim progress by 1 year, making the 2020 proficiency targets the new 2021 targets. We will also calculate 2021 proficiency both alone and as a composite average of 2018, 2019, and 2021 and use the higher of the composite average or 2021 results for scoring purposes. Scoring will [follow the existing published 2020 business rules](#), except as defined in this addendum. Draft 2021 business rules will be posted to ISBE’s Summative Designation page, at www.isbe.net/summative as a part of the public comment process.
 2. Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator). Describe the Other Academic indicator for the 2020-2021 school year.

Plan A (if method deemed valid and reliable by our Technical Advisory Committee (TAC)² upon review of 2021 data):
Calculate 2021 individual Student Growth Percentiles (SGP) using 2019 (and 2018 if available) as the priors for students in grades 5-8.

² Illinois’ Accountability TAC is facilitated by the Center for Assessment, which also calculates its Student Growth Percentiles. Illinois has held two TAC meetings evaluating the feasibility, validity, reliability and appropriateness of using a “skip-year” student growth percentile calculation methodology (06/04/2020 and 09/03/2020) by modeling calculations using existing 2016, 2017, 2018 and 2019 data. Additional analyses are planned for upcoming TAC meetings, including one in August of 2021 to make a final determination if 2021 data conform to the same assumptions and fall within the modeling parameters previously identified.

Calculate 2021 school-level Mean Student Growth Percentiles (MSGP) both alone and as a composite average of 2018, 2019, and 2021 and use the higher of the composite average or the stand-alone 2021 MSGP.

Plan B (if Plan A deemed not feasible):

Use a school's 2019 Mean Student Growth Percentile in calculating the 2021 designations, following existing published scoring business rules. Using prior performance will produce more consistent results than dropping the growth indicators if the skip-year method is not viable for some reason.

3. Graduation Rate. Describe the Graduation Rate indicator for the 2020-2021 school year.

Plan A: No changes to existing scoring rules, if supported by the 2021 4-year graduation performance distribution.

Plan B: (if there is a significant shift³ in the distribution of performance)

Adjust scoring range if needed based on the 2021 results to maintain the current score distribution (e.g. if 2% of schools achieved the highest score possible in 2019, the new effective scoring range will ensure at least 2% of schools achieve the highest score possible. If less than 4% of schools fell below the threshold for earning points, a new threshold would be set with fewer than 4% of schools below that level.). Currently a composite graduation rate of 100% = 100 points and 67% = 0 points. Schools that would otherwise be designated for Comprehensive supports based on a graduation rate below 66.67% would still be designated for such a reason, even though no new schools will be identified for support in 2021.

Plan B will be implemented only if the midpoint of the distribution decreases by a significant margin. It is currently unknown if COVID-19 and its associated impacts to education practice and policy will have an impact on 2021 rates of graduation, but no negative impacts were recorded for 2020.

4. Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator for the 2020-2021 school year.

All students identified as ELs in 2020 and 2021 will be given one additional year to their 5-year timeline. Students who reached proficiency in 2020, and thus are now considered former ELs in SY2020-2021 will be included in the ELPtP calculation for 2021.

Additionally, we will change the [currently published scoring rules \(p.7 subsections G. & H.\)](#) to replace missing 2021 data with the most recent available prior score. In cases where there are no prior scores for the student, then we will follow current rules and replace 2021 data with a score of 100.

³ A priori definitions of significant shifts to the performance distribution and/or other descriptive statistics will be proposed and defined by Technical Advisory Committee before the start of SY2021-2022, but only officially adopted after 2021 graduation data are available and can be confirmed to meet data assumptions.)

5. School Quality or Student Success Indicator(s). Describe each School Quality or Student Success Indicator for the 2020-2021 school year.

Science Proficiency (grades 5, 8, and 11): Illinois proposes to substitute science participation rate for proficiency rate for scoring purposes, and to propose an effective scoring range for participation that sets the top end of the range at 95% (i.e. 95% participation or higher will earn the full 100 points possible.) and the low end as the higher of range at either 0% or a participation rate where no more than 5% of schools for a given testing grade fall below that threshold.

This is necessary to ensure that ISBE has a sufficiently representative and large sample to conduct a valid standard setting. Illinois was fielding a new science test in 2020 that was cancelled by COVID-19. Knowing that ISBE had requested a waiver to use participation rates in lieu of percent proficient for purposes of accountability in 2020. This is even more critical now to incentivize the fullest participation possible and to ensure the largest data set for standard setting. Even with this, Illinois will have to conduct a standards validation in 2022.

- c. Annual Meaningful Differentiation. (*ESEA section 1111(c)(4)(C)*) (*corresponds with A.4.v in the revised State plan template*) Due to COVID-19, the State is revising its system of Annual Meaningful Differentiation in fall 2021 based on data from the 2020-2021 school year:

1. State's System of Annual Meaningful Differentiation. Describe the State's system of annual meaningful differentiation of all public schools in the State for accountability determinations in the fall 2021 based on data from the 2020-2021 school year.

ISBE will continue to use its existing indicators, modified as documented in sections 1 through 5 of this addendum. Index scores will be calculated as described in the draft 2021 business rules ([URL HERE](#)), and will issue the same four levels of performance defined as in the approved plan. These designations, however, will be contextualized when published on our state report card. "Trending Towards" will be added before the designation name and a trend signifier behind: "Growing" if improvement, "Stable" if no change, and "Possible Risk" if decline.

With the changes to the business rules, and a lower degree of confidence in the assumptions that support our data elements, it is critical to clearly signal that these designations are calculated differently than prior designations, and that the school might receive a different designation under the traditional system.

2. Weighting of Indicators. Describe the weighting of each indicator in the State's system of annual meaningful differentiation in fall 2021 based on data from 2020-2021 school year.

Not applicable. All indicators will retain the same weight they currently have in the system, and any indicators for which the minimum student group size is not met will be distributed as documented in our c

3. Different Methodology. If the State uses a different methodology or methodologies for annual meaningful differentiation for schools for which an accountability determination otherwise cannot be made (*e.g.*, P-2 schools), describe the methodology or methodologies in fall 2021 based on data from 2020-2021 school year.

Illinois will follow updated rules for mapping data to schools for which an accountability determination otherwise cannot be made, as defined in [our draft business rules](#). The

methodology for calculation of several indicators is now the higher of a stand-alone 2021 calculation or a three-year composite average of 2018, 2019 and 2021 data. Schools missing data for particular indicators because of their grade configurations will continue to share data sources as currently described in our [existing published business rules](#), with the exception of the growth indicator. As growth cannot be calculated for 2021 grade 4 students due to missing a prior score from 2020, this data cannot be mapped back to schools that terminate at grade 3 or grade 2. Instead the 2019 Mean Student Growth Percentile for these schools will be used.

d. **Identification of Schools.** (*ESEA section 1111(c)(4)(D)*) (*corresponds with A.4.vi in the revised State plan template*) Due to COVID-19, the State is revising its timeline or methodologies for identifying schools using data from the 2020-2021 school year:

1. **Timeline.** A State may, but is not required to, shift forward by **one-year** school identifications. Complete the below table to indicate each school identification category (i.e., comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI)) for which the State will shift identification forward for one year. Although CSI schools must be identified at least once every three years, due to the COVID-19 waivers, a State may choose not to count the 2019-2020 school year. Only complete the rows for the categories of identified schools for which the State chooses to shift the timeline forward.

A. Type of Identification	As Defined in Approved State Plan		
	B. Most Recent Year of Identification (e.g., identified in 2018-2019 based on data from the 2017-2018 school year)	C. Next Year of Identification as described in the current ESEA consolidated State plan	D. Revised Next Year of Identification (i.e., one year forward from column C)
<i>Example: Comprehensive support and improvement</i>	<i>2018-2019 school year (based on data from the 2017-2018 school year)</i>	<i>2020-2021 school year (based on data from the 2019-2020 school year)</i>	<i>2021-2022 school year (based on data from the 2020-2021 school year)</i>
<i>Comprehensive support and improvement: Low performing ESEA section 1111(c)(4)(D)(i)(I)</i>	<i>2018-2019 school year</i>	<i>2020-2021 school year</i>	<i>2021-2022 school year</i>
<i>Comprehensive support and improvement: Low graduation rate ESEA section 1111(c)(4)(D)(i)(II)</i>	<i>2017-2018 school year</i>	<i>2020-2021 school year</i>	<i>2021-2022 school year</i>
<i>Comprehensive support and improvement: Not Exiting Additional targeted support and improvement status ESEA section 1111(c)(4)(D)(i)(III)</i>	<i>Not Identified Yet</i>	<i>2021-2022 school year</i>	<i>2022-2023 school year</i>
<i>Additional targeted support and improvement</i>	<i>2018-2019 school year</i>	<i>2020-2021 school year</i>	<i>2021-2022 school year</i>

ESEA section 1111(d)(2)(C)			
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* Targeted support and improvement: Consistently underperforming subgroups (TSI) schools must be identified annually. Therefore, a State must identify TSI schools in the fall of 2021 (i.e., the 2021-2022 school year based on data from the 2020-2021 school year).

2. Methodologies. The State is revising its methodology or methodologies for identifying schools in fall 2021 based on data from the 2020-2021 school year for the following types of school identification:
 - a. Comprehensive Support and Improvement Schools: Low Performing. Describe the State’s methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement in fall 2021 based on data from the 2020-2021 school year.

Not applicable. Timeline shifted.
 - b. Comprehensive Support and Improvement Schools: Low Graduation Rate. Describe the State’s methodology for identifying all public high schools in the State failing to graduate one-third or more of their students for comprehensive support and improvement in fall 2021.

Not applicable. Timeline shifted.
 - c. Comprehensive Support and Improvement Schools: Not Exiting Additional Targeted Support and Improvement Status. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State’s methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years for school identifications in fall 2021 based on data from the 2020-2021 school year.

Not applicable. Timeline shifted.
 - d. Targeted Support and Improvement Schools: Consistently Underperforming Subgroup(s). Describe the State’s methodology for annually identifying any school with one or more “consistently underperforming” subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including if the State is revising the definition the State uses to determine consistent underperformance for school identifications in fall 2021 based on data from at least the 2020-2021 school year.

Illinois will be requesting a waiver of the requirement to identify consistently underperforming student groups. Our definitions require that a school fall within the lowest performing 10% in the state on all indicators in the system (i.e. their index score is in the lowest 10% for three consecutive years) or have a student participation rate on the ELA and math accountability assessments of less than 95% for three consecutive years. School year 2019-2020 was to be the third consecutive year. As the methodology for calculating the index score in 2021 will be significantly different, we do not believe it is appropriate to use in a three-year consecutive performance evaluation.

- e. Targeted Support and Improvement Schools: Additional Targeted Support and Improvement. Describe the State's methodology for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D) (i.e., schools with subgroups performing as poorly as low-performing schools identified for comprehensive support and improvement) for school identifications in fall 2021 based on data from the 2020-2021 school year.

Not applicable. Timeline shifted.

- e. Continued Support for School and LEA Improvement (ESEA section 1111(d)(3)(A))
(corresponds with A.4.viii in the revised State plan template)
1. Exit Criteria for Comprehensive Support and Improvement Schools. Due to COVID-19, the State is revising its statewide exit criteria for schools identified for comprehensive support and improvement using either or both of the options below.
- A. The State does not count the 2019-2020 school year toward the number of years in which a school must meet the criteria in order to be exited.
- B. The State is revising the statewide exit criteria only for schools identified for comprehensive support and improvement that would be eligible to exit status in fall 2021 based on data from the 2020-2021 school year.
- If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.*
2. Exit Criteria for Schools Receiving Additional Targeted Support. Due to COVID-19, the State is revising the statewide exit criteria for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) using either or both of the two options below:
- A. The State does not count the 2019-2020 school year toward the number of years in which a school must meet the criteria in order to be exited.
- B. The State is revising the statewide exit criteria only for schools receiving additional targeted support under ESEA section 1111(d)(2)(C) that would be eligible to exit status in fall 2021 based on data from the 2020-2021 school year.

If a State is proposing revisions due to COVID-19, check the box and describe the revisions here.