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To Whom It May Concern:

"The future belongs to young people with an education and the imagination to create."

—President Barack Obama

The Illinois State Board of Education (ISBE) has a tremendous opportunity to develop a robust plan as it implements the Every Student Succeeds Act (ESSA), ensuring that all of our students in the State of Illinois are afforded the extraordinary and transformative benefits of a well-rounded education. The very definition of “well-rounded” signifies the importance of making the arts an integral part of this plan.

My life has been dedicated to providing rich and powerful arts’ experiences to children in our state. I have had the great joy of working with young students as their imaginations expanded and their creative thoughts blossomed. There is no greater joy than seeing the trajectory of a student’s life forever changed as they experience the power of the arts. I am a passionate supporter of music programs for students throughout the Chicagoland area - especially those in underserved communities who would otherwise not have the opportunity for those experiences.

My commitment to our students is unwavering. As you move forward in developing your plan for ESSA, I strongly urge you to be unwavering in your support of arts education in the State of Illinois:

1. Please ensure that an indicator of student access to arts education is included in the state's formula for accountability.
2. Please encourage school districts to explore Student Support and Academic Enrichment Grants in order to increase access to the arts.
3. Please ensure that the arts are included in Title IV part A so there is more equity among all of our students in Illinois.
4. Please remind schools throughout the state that the new definition of STEM is now STEAM and that the arts is an equal member of this partnership.

Incorporating these ideas into the state's plan will make a significant difference in ensuring that all students in Illinois have access to a truly well-rounded education including the arts. Thank you for all you have done and will continue to do to meet the needs of all students in the State of Illinois and to provide them with powerful and life-altering experiences in the arts!

Sincerely,

Trevor Nicholas

Choir Director

Senn Arts

Chicago Public Schools

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Bridgette Harney

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Melinda Wilson

Curie Metropolitan High School for the Performing & Technical Arts
Hubbard Street Dance Chicago

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Sincerely,

Mimi Duginger

Mimi Duginger

President, League of CSOA

Email: DugingerM@cso.org

312-294-3171

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Mimi Duginger

To Whom it may concern,

It is important to include performing and fine arts and technical arts into the language for a "well-rounded" student.

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Section 2. Access and completion of arts (dance, music, drama, visual and technical arts) and enrichment coursework.

Page 17

And two or more of the following academic benchmarks or industry credentials:

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Page 19

vii: HS Curricular Measure AP/IB/dual/CTE/Arts (4 Groups)

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What other data do we want to include in our reporting system?

Number of schools who offer performing and technical art programs to provide a well-rounded education.

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State should identify the lowest performing 5% of schools first then identify high schools with a four-year graduation rate of less than 67%

School improvement plans should be given a maximum of four years prior to requiring comprehensive supports and services.

Varying factors include: administrative turnover, high staff turnover, student and family issues, interruptions to teaching.

Page 24

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CPS currently utilizes entrance and exit criteria per each class.

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Thousands of thanks for your time and continued efforts in inspiring students and keeping the arts alive.

Good Afternoon,

I was happy to attend the recent event at Simeon Career Academy but was unable to stay to provide testimony.

I wanted to simply echo my colleague Heather Robinson's words and request that ISBE take the arts into consideration when thinking of indicators and ways to implement ESSA.

The wording in the act make it clear that there is room for the arts to flourish in our schools and to be considered part of STEM education. A "well-rounded" education must absolutely include the arts in order to truly provide for the whole child.

According to Americans For The Arts, 72% of business leaders say that creativity is the number one skill they are seeking when hiring. If we are to prepare students to be successful outside of school, we need to help them think and problem solve creatively. Furthermore, low-income students who are highly engaged in the arts are more than twice as likely to graduate college as their peers with no arts education.

This data, and countless other pieces like it, make a strong case for arts being at the forefront of any new federal mandate for education and I hope that ISBE will make arts a major component of the implementation of ESSA.

Thank you,

Robin Koelsch

Arts Educator and Administrator

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--

Jan Heyn-Cubacub

Dance/Drama/Visual arts

Agassiz Elementary School

Dearest ISBE,

Thank you for giving me the opportunity to write to you.

Name: Melinda Wilson

Teaching Artist for Hubbard Street Dance Chicago

Teacher at Curie Metropolitan High School for the Performing & Technical Arts

MAWilson1@cps.edu

Here is the following information:

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Thousands of thanks for your time and continued efforts in inspiring students and keeping the arts alive.

Dear IL State Board of Education,

As a long-time music educator, I have seen the benefits of the arts in schools throughout the state, and believe that the IL State Board of Education needs to support arts education. The "Every Student Succeeds Act" must include a comprehensive education, including the arts. The arts are proven to help with creativity, divergent thinking, self-expression, self-esteem, and a sense of belonging. I believe the arts develop the total child, enabling each child to reach his/her greatest potential. I strongly encourage the learning standards to include the arts, and funding to support artistic development. If you have further questions, please contact me anytime at

jbundra@depaul.edu. Thank you.

Judy Bundra

Good morning,

I would like to first laud the State Board of Education for the inclusive approach it has taken to the process of developing the Every Student Succeeds Act Plan. I think I reflect the views of many educators in offering my appreciation for ensuring that the voices of stakeholders are incorporated into the development of this plan.

To this point, I know that ISBE has separated out discussions of its assessment plan from the work being done around ESSA. In looking at the coming months, I would hope that consideration be given to merging those discussions. The past years have brought what feels like an ever-changing landscape for assessment in Illinois. For elementary schools, nearly annual changes in state assessments have hampered the ability to chart student growth as each year has seemed to bring with it new baseline data. During the past six years, elementary students have participated in three versions of ISAT and two versions of PARCC. Adding to this concern is the fact that we have no direction as to the future of PARCC in elementary schools once the contract expires next year. This sets up the potential for another tectonic shift in the state's assessment plan in the coming years. These continuous changes run contrary to the foundational principles of ESSA—which seek ways for districts to measure student growth over time. Such efforts are impossible without stability in the state's assessment plan.

At the end of the day, the assessment plan will be the engine that drives ESSA. While there are elements of the state's draft ESSA plan which are laudable, I am unable to assess the plan without having a clear vision as to where we are going with assessment. It would be like buying a car without knowing if the engine will be changed in the next year. If Honda is going to replace the engine in my Accord with one made for a lawnmower, all of the great features of the vehicle are moot.

My plea is to work to provide stability so that districts can engage in long-term planning and make use of the data we receive from state assessments. PARCC is not a perfect assessment. However, it is one which is a reliable indicator of progress toward College and Career Readiness. If there is a desire to replace PARCC, I would ask that it be done concurrently with the process for developing the ESSA Plan—and that a long-term commitment be made to the next assessment plan. Merging these processes will allow stakeholders to provide more informed feedback on what ESSA should look like in Illinois.

I thank you for your time and would be willing to assist with this process in any manner possible.

Sincerely,

Dr. Peter M. Sullivan
 Superintendent of Will County School District 92
 708 North State Street
 Lockport, Illinois 60441
 (815)838-8031

ESSA feedback comments:

1. I affirm the high school student success / school quality accountability standards in example two from the ESSA listening tour.

2. I affirm suggested college/career ready indicators framework.
3. East St Louis school District and our community partners have experienced constraints to braiding and blending of Federal funds. This has particularly been true for braiding GEAR UP and Upward Bound funded activities to support college preparation.

Sydney Stigge-Kaufman
Director of Strategic Partnerships
East St Louis School District 189

Dear ISBE,
I have had the privilege of teaching dance for the past 10 years. All of those years I have spent teaching at least part time in the public schools and have seen the benefits that it brings to all students in terms of confidence, self-discipline, creativity, and self discovery to make a few. Please consider these additions to ISBE'S ESSA.

Sincerely,
Laura Migas
Part time Dance Educator
Senn Arts Magnet High School

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Good afternoon!

Please see the below feedback from District 129 regarding the proposed ESSA program. We appreciate being able to respond and look forward to any future conversations. Thank you!

1. Every district calculates GPA differently (weighted, core GPA, quality points, etc.), districts would need more specifications to be consistent in our reporting.
2. GPA is a predictor of student success, but level of rigor in terms of courses matters and simply looking at GPA does not provide that insight.
3. We are recommending either the GPA requirement OR the academic indicators. We believe the AND is problematic because it can lead to contradicting information. i.e...a student achieves multiple 3+ on AP exams, but receives poor grades overall.
4. A district the size of ours, we can offer many AP courses/Dual Credit courses. Unfortunately, smaller school districts cannot provide the same type of offerings. (This statement holds true to many of the academic and career ready indicators)

5. Dual credit requirements force agreements with community colleges that vary in their access at articulation and financial compensation. They also, follow different regulations and governance that vary by content area. Some community colleges welcome these partnerships; others do not.
6. Districts have very little input or understanding of College Readiness Placement Assessments (Accu-placer). The Compass test in past year's best represents this concern. It over identified students for remedial classes and provided false information regarding placement.
7. As we agree with co-curricular participation for students, we are unsure how participating in activities is a direct link to career readiness. The other concern is how to mandate districts to sustain offerings in a very uncertain financial climate.
8. More explanation of co-curricular is needed to determine what qualifies as an offering.
9. 90% attendance guidance is vague. What are we constituting absences from school (excused, unexcused, medical, school activity)?

Joy Engfer
Executive Assistant to the Superintendent
Board of Education Secretary
 West Aurora S.D. 129
 1877 W. Downer Place
 Aurora, IL 60506
 P 630-301-5033
 C 630-660-9719
 F 630-844-4442
jengfer@sd129.org

The following is the feedback from Richland School District 88a in Crest Hill, IL. We reviewed the plan as a DIP Team, consisting of 5 Administrators and 4 Teachers, and feel the following:

- Are the benchmarks made by ISBE "90% of students..." The measuring stick or just a goal to shoot for?

2.2 Academic Assessments-SAT

- An assessment system needs to be chosen that aligns from elementary school through high school. (PARCC and SAT do not align)

2.2 Academic Assessments-Access

- When looking at continued EL support-We would like to see exit criteria raised.
- When looking at continued EL support-Some students will not show proficiency on ACCESS because they are twice exceptional (have a disability). Benchmarks should take this into an account for students designated as twice exceptional.

- For ESSA accountability, Students who do not show proficiency on ACCESS should not be held to the same standards on PARCC or adopted State Assessments because ACCESS is showing that they are not language proficient. ISBE should consider an alternative achievement benchmark for this protected group.
- For ESSA accountability, ISBE should consider implementing measures for ACCESS based on growth in language development rather than a standard proficiency level.

3.1 Accountability System- College and Career Framework

- We think that the framework is balanced and looks at what is going to allow students to be successful in college or career after high school.
- The academic standards side is missing realistic benchmarks for students that are average ability, not honor or remedial. (Algebra II is the only regular course listed for students that are college bound and are not enrolled in AP classes)
- GPA is rigorous, but probably not realistic. We support a 2.5 minimum.
- Algebra II is not available at all high schools. It should read Algebra II or Equivalent Math Course for integrated systems.

3.1 Accountability System: Weighting

- The growth weighting should be more than the overall academic achievement.
- The EL measure should be determined by the EL population in the district (districts with a lower percentage of EL students will have to rely heavily on the weight of each student compared to districts with a high percentage of EL students)
- High school districts have a disconnect with elementary districts because HS districts do not have a growth indicator.
- It must be clearly identified that if a graduation rate is used for accountability that all students graduating meet the standards set by the College and Career Framework.
- At the elementary level, we agree more with the Student Success/School Quality Indicators listed in example 2. Specifically Teacher Quality, Chronic Absenteeism, SEL. We do not feel Pre-K should be included in the indicators. We also feel strongly that the state needs to limit formalized state assessments for students in K-2 in order to allow for maximum time for students to be exposed to direct instruction that builds foundational skills needed to be a successful student. Schools should be allowed to utilize a district assessment already implemented for this purpose rather than adding additional assessments at this level.

3.1 Accountability System Goals

- All schools should have long-term goals based on quantitative data that have been established through benchmarks, which drive SIP and DIP plans and include various stakeholder groups. / I would suggest a 3 year short term goal as well because the 1st year could be fraught with miscommunication and/or inconsistencies. 3 would be smooth sailing, theoretically/ use the baseline data to drive the SIP/DIP, from which each local district would develop goals that best match their demographics and local goals. This should be based on individualized goals to maximize student growth. The SIP/DIP would use short-term and long-term objectives based on current student demonstrated achievement.
- Growth should follow the standard pre/post model with growth ranges set using scientific avgs
- Could we define achievement by meeting a % of established age/ability/grade level appropriate targets?
- Wouldn't requiring a significant (# to established later) % of students to meet growth targets help to eliminate 'bubble syndrome'? Higher end of the spectrum COULD be looked at as a

'maintain' group OR make their growth goals smaller since there is less area for growth in the standard curriculum

Dr. Kelly Whyte
Principal
Richland District 88a
1919 Caton Farm Road
Crest Hill, IL 60403

815-744-6166 ex. 103

Hi Melina
Here are my thoughts/concerns

The decision to remove PARCC from the HS and move to the SAT was a MISTAKE by ISBE.
As a result of this decision there is No linkage between elementary and HS assessments-
Remember the ISAT and PSAT days?

Schools that have used ACT and EPAS no longer have any historical or baseline data to measure and monitor student growth.

SAT claims that the SAT should NOT be used for placement or as a growth measure, it is only a college entrance exam. Thus, it has no value in improving classroom instruction or enhancing curriculum.

Too much focus on college entrance scores.

The only academic measure in ESSA is SAT. The newspapers will still use these scores as a source of bad Headlines.

What happened to the growth charts and models proposed by ISBE a couple of years ago??

What about IBAM?

I don't understand why ELL students are singled out as a demographic and given weight in the final rating.

The ESSA plan says schools will have local choice in the college entrance assessment. What does this mean?

If schools and scores in meeting metrics are identified, how is ISBE going to ensure that they are not RATED and LABELED?

Suggestion- Include the assessment division in the listening tours as so much of ESSA is based upon assessment issues.

I truly appreciate your willingness to listen.

Brett Gould
Lockport High School

I am an elementary education teacher with a high level of concern regarding the state test scores. I feel that districts should not be judged solely on the state test scores and that student growth should count as a substantial part of a district's score. Especially, when it comes to IEP students who are not taught at their grade level. I also feel that it is very unfair for a high school higher level class where an IEP student would not be present, to show an overall higher score, where an elementary classroom must count the IEP students test scores as part of their class. When a classroom of 17 or 18 students has 4 or 5 IEP students, their test scores bring down the overall class scores tremendously. Student growth should count for our elementary classrooms!

Thank You for your time.

Sincerely,
Mrs. Hill

From: Lindsay Eckart [mailto:eckart@cvillecusd1.org]

I feel districts should not be solely judged on the state test scores. Student growth should count as a big part of a district's score. Using state test scores as the only measure of success does not take into account IEP students who are often not taught at their grade level and should not be compared with their peers.

I urge you to provide off-level testing for students who are identified above grade-level in order to accurately measure growth.

Georgia Nelson - teacher
Hough School
Barrington CUSD 220

To whom it may concern,

I want to strongly advocate for the Illinois ESSA plan to remove AND from the college and career readiness indicators. Instead, our state needs to take the national recommendation that says academic indicators OR testing benchmarks. Forcing the academic indicator and testing benchmark makes the target unrealistic. I believe in accountability and college and career readiness. I ask for appropriate levels.

<http://www.redefiningready.org/college-ready/>

Thank you for the consideration.

Matt DeBaene

Assistant Superintendent for Teaching and Learning
Moline - Coal Valley CUSD 40

ESSA Comments

Re: College and Career Readiness Framework

SAT score

I appreciate that the board is acknowledging that multiple indicators should be used to determine college and career readiness, but using the proposed framework, "readiness" still hinges on the student first meeting an SAT minimum score, before the second and third groups are considered.

Instead of it being an "AND" proposition, I would rather see an "OR" statement included so a student can demonstrate readiness in multiple ways. Either a student could meet the minimum GPA and SAT score, or that student could demonstrate readiness by achieving a minimum GPA and a pre-determined number of the college and career-ready indicators included in the framework.

This would keep a single test score from defining a student's "readiness."

GPA

1. I think it should be a 2.5/4.0 minimum, cumulative GPA.
2. I think the framework should be tweaked to include an "or" provision that would allow a student's Jr/Sr year GPA to be used, instead of only looking at cumulative. Many students struggle during their freshman and sophomore years before "getting it," which makes it hard to achieve the cumulative GPA. Allowing the Jr/Sr year GPA to be an option could be a more accurate representation. Example: 2.5/4.0 cumulative GPA or 2.8/4.0 Jr/Sr year GPA.

Thank you for your consideration.

Nick Elder

Director

Education for Employment System #330

Early College and Career Academy

Parkland College, Room A113

217.355.1382

www.efe330.org

www.facebook.com/EFE330

www.twitter.com/EFE330

The word "AND" for each of the indicators and benchmarks goes against the Redefining Ready (<http://www.redefiningready.org/>) recommendations which includes the word "OR."

Redefining Ready has done the research. Why isn't ISBE adopting their recommendation?

Donald D. Owen, Ed.D.

Superintendent

Urbana School District #116

205 North Race Street

Urbana, IL 61801

217.384.3636

twitter: [@dowendo](https://twitter.com/dowendo)

As I read through the ISBE ESSA draft document, several questions came to mind about items noted under the "Illinois College and Career Ready Indicator Framework."

- 1) 25 hours of community service (or military service)
 - Over how many years does this need to occur?

- 2) Workplace learning environment?
 - Would classes that require an internship or clinical hours, such as health occupations, count toward this experience?

- 3) Two or more co-curricular activities.
 - Do districts have discretion as to what is deemed a co-curricular activity?

Thank you.

Renee Reynolds

Renee Reynolds

Assistant Principal, Instructional Programs

St. Charles North High School

255 Red Gate Road

St. Charles, IL 60175

331-228-6219

Miss Kelly Jacoby, English Language teacher at Francis Willard

I feel this document has a lot of great ideas, but we lack the specific set criteria to implement these changes successfully.

Currently, we use ACCESS as our EL standardized assessment this is given in January. When students enter a district we use the WIDA-Model for screening. I feel that in order to effectively serve our EL students and to provide a level of rigor that is appropriate for their level of language acquisition, it would be best to tier students based on overall levels of proficiency(both ACCESS and MODEL provide a number that gives at least a rough proficiency level). For example, students who have a composite of 1.5 or less should be receiving a certain level of services with EL (minutes) per day. Students with 2.0-3.0 should receive another level of service. 3.0-6.0 another level, etc. Right now we are given a minimum amount of time in which we are supposed to have EL students in our classroom. This is the same regardless of proficiency level. The only exception is for students who have been in a US school less than a year. So-- we have students who would greatly benefit from more EL time that are not getting it because there is no legislation that says we HAVE TO. As districts struggle with budgets, bringing in extra EL staff to provide this additional time is a "frill" that many schools just cannot afford. But clear and explicit instructions regarding minutes of EL class time that correlates with proficiency level would force school districts to reconsider staffing needs and overall school schedules. Currently the state requirement is 30 minutes per day at the elementary level, and one class period of time at the junior high/high school levels. As with anything, one size fits all will not meet the needs of unique populations.

In my dream world-

1.0-2.0 (newcomers) proficiency levels would receive 90 minutes of EL services per day.

2.0-3.0 proficiency level students would receive 45 minutes of EL minutes per day.

3.0 and above proficiency levels- 30 minutes of EL time per day (this is currently the time we provide for almost all student levels.)

Here is a very common scenario- A third grade student has been in the US less than two years. Technically he will no longer receive services at a higher level because of the amount of time he has lived here. He is no longer a "newcomer". However, his proficiency level is at about a 1.9. He cannot read at grade level and will spend much of his time feeling lost during grade level ELA instruction in his classroom. This ELA time is required in blocks of time. As a school we have no choice but to have the student in ELA blocks that are not entirely beneficial, while he could be receiving EL services which also provide ELA components instead. EL students cannot show levels of achievement if they cannot speak or read the language. Period. While it is good that there are now some standards in place that align with common core that addresses SOME language proficiency issues, I do not feel they are realistic. I will elaborate in person on this.

I feel that we should use these same proficiency markers when creating and implementing accommodations for standardized testing. I feel that when taking MAP or PARCC for example, that all EL students should be receiving extended time. Many of us take for granted that all EL students take a great deal longer when reading something. They should, they are literally translating word-for-word as they read.

I agree with this reading that we should consider NOT including any standardized scores from the first year of EL student attendance in an Illinois school. But I feel it should actually be two years, not just one.

A consortium is mentioned. I do not believe there are any representatives from any PUBLIC K-12 school in the Quad City area (This may have changed as I read the list of participants more than a year ago). This is important to note as we have a unique cultural composition that differs from the Chicago area or the southern regions of our state. Not everything is about Spanish. For example, the majority of the EL students at FW speak Karen. We cannot find Karen paras or bilingual Karen-speaking certified teachers. A year ago, there was not a proficiency test available to provide bilingual certification in Karen in Illinois. This is an issue that is unique to our school and district. For another district it could be another language.

Those are my thoughts so far, I will add more. After reading the above mess, maybe you are sorry you asked...

I hope you are having a great day.

Kelly

My name is Delia Barajas I am a constituent of Cicero, IL. Cicero, has 52% of EL's in Cicero District 99. Unfortunately, District 99 EL's are chronically failing on the state mandated testing. Our EL's testing scores for the Illinois report card for 2014-2015 are dire.

The EL's have not received an equity or equal access to a quality education for the past 5 years. District 99 has 93% Latinos one of the largest Spanish speaking school districts in IL. There are approximately 90% of students from low income families in the district.

The school district was monitored by the US Department of Education on 1997 until present for EL's? Then on 2013 ISBE audited the EL's Department for out of compliance issues for EL's. Regardless, of remediation efforts from District 99 EL's continue to fail drastically.

Now 2016, 3 years later, 0% of EL's have not met or exceeded the PARCC testing. In addition, to EL's failing records a federal litigation case was just settled with Dr. Montes v. District 99. Costing Cicero tax payers thousands of dollars. This discrimination case was based on the firing of a qualified Latina at District 99 for a less qualified Anglo employee. The depositions on this public federal discrimination case indicates how administrators mispend federal dollars by not opening books for EL's.

District 99, was in the media about several issues on the school board 99 wasteful spending. The school boards in Cicero are highly connected to the Town President Larry Dominick. At the August 2016 school board meeting Brian Dominick was hired for the Executive Director to Buildings and Grounds at District 99 where his brother Derek Dominick is a school board official.

How will ESSA protect the EL's education in both District 99 and 201 political machine fiasco? These school boards are so connected with President Dominick you can find their employment on the Town of Cicero's website. ESSA, must take responsibility and create policies to create accountability for school

board members like Cicero. Otherwise, ESSA will continue to experience more Civil Rights complaints, federal litigation cases, and federal tax dollars on patronage jobs.

Please edit a section for accountability by school board members the way students and teachers are held accountable.

LIBRARIANS

October 7, 2016

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It has come to my attention that the latest draft of the Illinois plan does not include language addressing the necessity of supporting effective school library programs. The Every Student Succeeds Act recognizes the importance of “effective school library programs” to student achievement and references these multiple times. Therefore, adding provisions in the Illinois Plan that ensure the success of school library programs is crucial.

Schools that have fully staffed, effective library programs critically support student achievement in Illinois. Please consider adding these school library and school librarian-focused policy recommendations to the final Illinois ESSA Implementation Plan:

1. Endorse adequately staffed libraries, including a state-certified school librarian who is an instructional leader and teacher;
2. Maximize use of federal funding through grant programs like Innovative Approaches to Literacy (IAL), LEARN Act funding, and the Block Grant to create, enhance, and maintain effective school library programs, and provide robust professional development opportunities to school librarians across our state.

Thank you for the opportunity to voice my concerns about the Essa Illinois State Plan.

Sincerely,

Mr. Shawn Hennon
Physics Teacher
Belleville Township High School – East
2555 West Boulevard
Belleville, IL 62221
[\(618\) 222-3750](tel:6182223750) voicemail box #4746
shennon@bths201.org

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Sincerely,

Rich Hodson
Belleville East High School
Belleville, IL

October 7, 2016

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Sincerely,

Mike Rogier
Science Teacher
Belleville West H.S.

October 7, 2016

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Sincerely,

Connie Culbertson

Teacher/Librarian
Interact Club Faculty Advisor
Belleville West High School
4063 Frank Scott Parkway West
Belleville, IL 62223
Library Phone: 618-222-7638

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Sincerely,
Mrs. Jean Sax Meyer, MS ED
Belleville East High School
Algebra 3-4 Core
Learning Strategies
Renaissance Mr. Lancer Pageant Sponsor
Senior Olympics Coach

October 7, 2016

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Sincerely,

Merle Wilder
School Counselor (Students Sc--Z)
Belleville East High School
2555 West Blvd.
Belleville, IL 62221
(618) 222-3762

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Thank you for the opportunity to voice my concerns about the ESSA Illinois State Plan.

Sincerely,

Ms. Danielle Daniels
English Teacher
Assistant Speech Coach
Belleville East High School
ddaniels@bths201.org

October 7, 2016

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Sincerely,
Ashley Short

LIBRARIANS

October 7, 2016

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Sincerely,

Evelyn Reece
Belleville Township High School East
English Teacher
618 222-3700 ext 4731
ereece@bths201.org

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Sincerely,

--

Michael Chace
President, Teacher Assistant's
Bths 201, Local 434
618-973-3872

October 7, 2016

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Sincerely,

Russell Reidelberger
Belleville West High School
English Department
Assistant Speech and Acting Team Coach

October 7, 2016

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Sincerely,

--

Julie Schloesser
English Instructor
Belleville West

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Sincerely,

Jules Hunter
Belleville West High School
English Department
STAR Team
jchunter@bths201.org
618-222-7500 Ext: 4667

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LIBRARIANS

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Thank you for the opportunity to voice my concerns about the Essa Illinois State Plan.

Sincerely,
Laurie Bielong
Belleville, IL

October 7, 2016

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Sincerely,

Cyndi Oberle-Dahm

--

Cyndi Oberle-Dahm

Belleville West Social Studies Department Chair
Adjunct Instructor, St. Louis University
AP Mentor, United States History
Regional Coordinator, World Link Inc.
President,-Elect Belleville Federation of Teachers, Local 434
Adviser, Model United Nations
Sponsor, Lifesavers
Teachers for Global Classrooms Program Fellow

October 7, 2016

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Sincerely,

Chris

--

Mrs. Christina Roedl, Ed. S

LIBRARIANS

Individualized Education Teacher
STAR Team Coordinator
IFT Local 434 COPE/Prof Issues
Belleville East High School
(618) 222-3700 x4553
croedl@bths201.org

October 7, 2016

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Sincerely,
Mary J. Kaemmerer

October 7, 2016

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Sincerely,
Caleb Romoser

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Caleb Romoser
Spanish
Belleville East & West

October 7, 2016

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Sincerely,

Elaine Souders

Belleville West High School
Anatomy & Physiology and Biology Instructor
Science Olympiad Sponsor

October 7, 2016

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Sincerely,

Debra Stierwalt
Belleville East High School
Mathematics Department

October 7, 2016

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Thank you for the opportunity to voice my concerns about the Essa Illinois State Plan.

Sincerely,

Cherri Thompson

Cherri Thompson
CTE Dept. Chair
Belleville West High School
4063 Frank Scott Parkway W
Belleville, IL 62223
(618) 222-7688

LIBRARIANS

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Sincerely,
Matt Osborn

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Matt Osborn
Mathematics Teacher

October 7, 2016

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Sincerely,

Anne Belline

Anne Belline
Teacher Assistant
District 201 Coordinator
JROTC CLUB/Military Connections
Democracy Team Member
Believe Team Member
Belleville East High School
2555 West Blvd
Belleville, IL 62221
Cell: 618-616-8345

October 7, 2016

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Sincerely,

Lannette Story
Bellevinois Co-Adviser
English Instructor
Belleville West High School
618-222-7661 ext 4451

October 7, 2016

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Sincerely,
Frerker, Jeff jfrerker@bths201.org

October 7, 2016

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Sincerely,

Amber Thurnau
English Teacher
Odyssey of the Mind & Page One Sponsor
Belleville West High School
<http://blog.bths201.org/bw-thurnau/>

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Sincerely,

Jeremy Lucas Witt
Social Studies Teacher
Head Girls Golf Coach
Maroon Madnezz Sponsor

Belleville West High School
4063 Frank Scott Parkway West
Belleville, Illinois 62223
(618) 222-7500 ex.4685
FAX (618) 235-2484

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Sincerely,
Laura Byrne

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Laura Byrne

Belleville East High School
English Department
lbyrne@bths201.org
618.222.3700 ext. 4410

October 7, 2016

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Sincerely,

Annette Whitaker

October 7, 2016

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Sincerely,

Jennifer Lewis

English Instructor

Belleville West High School

Belleville, IL

October 7, 2016

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Sincerely,

--

Jayna Spillan
Science Department
JV Basketball Cheer Coach
Belleville Township High School District 201

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Sincerely,

Stephanie McGarrity

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Jennifer Sanders
Belleville East High School

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Candice Santos

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Sincerely,

Nikki Stringer

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Sincerely,

Nikki Stringer

October 7, 2016

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Sincerely,

Joseph Lombardi
Science Department Chair
Belleville West High School
618-222-7615
jlombardi@bths201.org

October 7, 2016

Dear ISBE,

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Sincerely,

--

Nancy Bergman
Human Resources Administrative Assistant
Belleville Township High School District 201
920 North Illinois Street
Belleville, IL 62220
618-222-8242
Fax 618-233-7586
nbergman@bths201.org

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Sincerely,

--

Ann Lillard
English Instructor
Belleville East High School

October 7, 2016

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Sincerely,

--

Neilie A. Sternau
Social Worker
Belleville East High School
(618) 222-3749
October 7, 2016

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Thank you for the opportunity to voice my concerns about the Essa Illinois State Plan.

Sincerely,

--

Tina Rideout
Faculty Typist/Administrative Assistant
Belleville East High School
618.222.3738 Phone
618.222.3799 Fax

LIBRARIANS

October 7, 2016

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Sincerely,
Aaron Lands

--

Aaron Lands, MEd, MA
Social Studies Teacher
Belleville East High School
[618-222-3716 Ext. 4466](tel:618-222-3716)
alands@bths201.org

October 7, 2016

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Sincerely,

Tonya L. Sears
Director of Counseling
Belleville East High School
(618) 222-3746

October 7, 2016

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Sincerely,

Jamison Klein
Industrial Arts Teacher
Belleville West High School
4063 Frank Scott Parkway West
Belleville, IL 62223
618-222-7654 ext 4619

October 7, 2016

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Sincerely,

--

Lynn Schwoebel
Junior Secretary
(618)222-7613

lschwoebel@bths201.org

October 7, 2016

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Sincerely,

Mrs. Pat Mertens
Registrar Belleville East HS
Phone 618-222-3765
Fax 618-222-3799

October 7, 2016

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Sincerely,
Sherri Gregson

October 7, 2016

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LIBRARIANS

Thank you for the opportunity to voice my concerns about the Essa Illinois State Plan.

Sincerely,

Andy Gaa
German Teacher
German Club and German NHS Sponsor
GAPP Coordinator
Belleville East High School

October 7, 2016

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Sincerely,

Kathryn Guebert

October 7, 2016

Dear ISBE,

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Sincerely,

Lucas Spriggs
232 Springdale Dr.
Belleville IL, 62223

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LIBRARIANS

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Sincerely,
Soune Ursani

October 7, 2016

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Sincerely,

Stephen Garland
English Instructor
Hy News adviser
Belleville West High School

October 7, 2016

LIBRARIANS

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Sincerely,

Erin Pettus

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Sincerely,

John Lodle

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John Lodle
English Department
Belleville West High School

October 7, 2016

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Sincerely,

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Thank you,

LIBRARIANS

Danielle M. Koeneman
School Counseling Co-Chair (Fo-Hop, W-Z)
Belleville West High School
618-222-7643
dkoeneman@bths201.org

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Sincerely,

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Mrs. Anne Brown
Belleville Township High School
Math Teacher
HOPE Club Sponsor
abrown@bths201.org

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Sincerely,
Rich Mertens

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Sincerely,
Joe Nesbit

Joe Nesbit
Instructional Technologist @JNesIT
Boys Varsity Volleyball Coach @BELancerBVB
Girls JV Volleyball Coach @BELancerVB
Belleville East High School
618.222.3740
jnesbit@bths201.

LIBRARIANS

My name is Lisa Walsh and I have been a high school librarian/media specialist for the past 14 years. I have also been a proud member of the American Library Association, Illinois Library Association and Illinois School Library Media Association for the past 16 years.

Although I have been unable to attend any of the ISBE ESSA meetings, I appreciate the opportunity to provide written testimony regarding how uniquely qualified school librarians are to work with all students in achieving future academic, career and personal success.

School media specialists/librarians are strong believers in effective school library programs that provide equitable support for all students in multiple ways. This includes both classroom instruction and individual assistance designed so that students grow and achieve personally, academically and professionally.

At Hillcrest High School, my colleague and I co-teach digital literacy to five freshmen business classes each fall. We also instruct classes throughout the year on information literacy, research and evaluation methods to improve all students' skills in these areas. With our 1:1 iPad initiative we are constantly working with our students to develop 21st Century learning skills.

Our library is an open, welcoming learning environment for everyone in our school to use. We provide extended hours so that students may use the library and its resources before and after the school day. We proudly assist and serve all of our students in whatever they need. This might mean encouraging a reluctant reader to start a good book, assisting a confused student with downloading their textbook to their iPad or teaching a pupil how to evaluate a web site for their research project. The library is there for all students to complete homework, read a magazine, collaborate with others on a project, or conduct research using our books or electronic resources. As a certified librarian/media specialist I am prepared and qualified to help these students before, during and after their classes.

Our days (plus evenings and weekends) include collaborating with faculty in developing lessons and programs that incorporate information, research and evaluation literacy skills. We work with teachers regarding needed resources and collaborate on grants to help obtain project materials. Additionally, we provide programs and lessons to classes regarding cyber and digital safety.

As a trained librarian/media specialist I help develop a strong effective library program for our at risk school using free and licensed electronic resources along with materials obtained through federal, state and local funds and programs. These funds and resources help supplement our online and offline student collections when the library budget is not able to, giving equitable support to all our students.

Therefore, I ask ISBE to support effective school library programs by ensuring students have access to licensed school librarians/media specialists in all of our public schools. Additionally I ask ISBE to continue finding and providing various school library funding in order for students to have equitable access to educational resources.

Lisa Walsh
Media Specialist
Hillcrest High School

LIBRARIANS

Bremen High School District 228
17401 South Pulaski Road
Country Club Hills, IL 60478
Phone: 708-467-4875
Email: lwalsh@bhsd228.com

Dr. Lynn Gaddis, NBCT
 President, Illinois State Teachers of the Year (ILSTOY)
 Please let me know if you need any further clarification or documents.

Section 4: Supporting Excellent Educators (pages 33-41)

Student Learning ← Teacher Practice ← Teacher Learning ← Teacher Leadership Roles & Training
 ← Change the Culture ← Shared Decision Making

The ultimate goal is to improve student learning through teacher practice. Teacher leadership roles and training will improve teacher learning. To effectively develop teacher career continuums and pathways, there needs to be a change in culture through shared decision making. Illinois has the opportunity now through ESSA and Title Funding to enable districts throughout the state to build a culture of professional learning. Districts should develop career pathway/lattices for teachers to lead and learn from one another with collective responsibility and accountability based on analysis of multiple sources of data. This change in the culture from isolation to school shared leadership in content, context, and process of professional learning in the unique context of each school and district will result in improving the culture/climate for effective teachers to impact their colleagues practice to improve student-learning growth. Each district in the state has unique human and fiscal resources as well as needs of students so the design guidelines should be flexible so that each district plan shows how to do what is best for their students within the context.

We need to redefine professional learning that is teacher-led, just-in-time, and job-embedded that impacts student learning. Understanding the needs of diverse students, ways of learning and challenges, the state should enable districts to use funds to ensure that teachers know how to work with their unique and diverse population of students to achieve high and appropriate goals.

- how they learn,
- how to select instructional strategies and resources to connect the content to diverse students,
- monitor and manage that learning,
- reflect on analysis of their instruction's impact on student learning, and
- setting high and worthwhile goals appropriate for continued improvement for individuals and small and whole classes of students. (NBPTS)

Recommendations

Teacher Leadership in ESSA Planning and Implementation. ILSTOY identified three key components for teacher leadership in a redefined professional learning culture.

- I. Teacher Leadership in State Planning for ESSA
- II. State Guidelines for District Plans for Title II Funding
- III. State Support for Districts and Schools

The state should enable districts to design professional learning plans under Title II that will be effective in improving teachers' practice that impacts their student-learning growth for all students. For PLEs to

be teacher-led, job-embedded, teachers should select, design and deliver PLEs linked to the learning needs of their unique students and teacher learning in instruction, curriculum, and assessment. Illinois should offer “opportunities for teachers to share their professional expertise.” ISBE should model and set guidelines to partner with teachers validating their expertise in shared decision-making

I. Teacher Leadership in State Planning for ESSA

Ongoing Teacher Leadership

- Establish a teacher-in-residence program for teacher leaders as advisors (full-time or hybrid) on state initiatives and serve as reviewers and consultants for PLE plans.
- Establish a teacher leader advisory council for teacher leaders to provide input and feedback on development of guidelines, compliance recommendations, communication with teachers, and policy implications and initiatives.
- Support teacher leaders as members on every development group of the ESSA and Title state plans (travel, release time). Respect teacher time through videoconference calls, webinars, asynchronous opportunities for input/feedback.
- Implement a communication system directly focused to teachers (ESSA and PLE messages, platform for input, resources, listservs, social media, webinars). All teachers should have access for input/feedback to develop state priorities and planned actions in the state ESSA/Title plans.
- Include guidelines for districts to plan comprehensive systems for teacher voice in shared leadership in schools/districts that impacts teacher and student learning.

II. State Guidelines for District Plans

ISBE should develop the following guidelines for district applications for Title II funding.

Shared Decision Making in District and School Planning

Districts should convene representatives from their district (teachers, teacher leaders, school and district administrators, parents, students, and community) to

- Analyze their readiness using a state-developed readiness tool for shared decision-making and teacher-led professional learning.
 - what is currently effective in the district and
 - what they need to change to design and implement the features of teacher career pathways/lattice and enable the conditions for sustainability.
- Develop plans that allow for the unique contexts of each school and directly addresses needs for teacher professional learning that will improve student-learning growth.
- Analyze existing policies to identify barriers to effective professional learning (contractual obligations, schedules, and what is identified.)
- Establish systems to engage teachers to identify and student learning strengths and gaps to high standards and how their students learn to teachers’ strengths and gaps in professional growth that impacts student-learning growth.
- Establish professional learning teams (teacher leaders and principals) to analyze data to design,

implement, and routinely adjust for the effectiveness of the PLEs for individuals, groups, and faculty to impact student growth.

- Arrange schedules and opportunities for teachers' collaboration before, during, after school in PLEs as appropriate to the district and school contexts.

Guidelines for Features, Conditions and Data

- Design features support effective professional learning experiences that impact student-learning growth:
 - o transparent public teacher leader roles, eligibility criteria and the selection process;
 - o opportunities for collaboration/released time;
 - o compensation;
 - o peer coaching/peer evaluation;
 - o professional development of teachers and teacher leaders (aligned to the Teacher Leader Model Standards; and
 - o teacher voice in school leadership.
- Enabling conditions for sustainable effective PLEs in the following areas:
 - o readiness;
 - o leadership commitment and training;
 - o stakeholder involvement;
 - o school culture in shared decision making; and
 - o funding allocation for sustainability.
- Process for data analysis for continuous improvement. Compile and analyze data from multiple sources to determine the content and appropriate professional learning experiences for teachers. Data from the following should be included:
 - o Student growth accountability systems.
 - o Teacher professional development surveys, exit slips, focus groups, feedback, and input.
 - o Teacher evaluations. In the professional growth section, teachers may voice their successes/concerns to inform how they may lead or in what areas they need professional learning experiences to improve.
 - o Walk-through and observational data.
 - o 5 essentials state-mandated, bi-yearly school survey of teachers, parents, and students that addresses the culture of readiness for professional learning in these areas: effective leaders, collaborative teachers, involved families, supportive environment, and ambitious instruction.

Teacher Leader Roles

District plans should select from or combine types of leadership roles from the list below based on analysis of data that connects student learning to teacher learning needs. To ensure student success, teachers take risks in shared leadership and collaboratively influencing one another's practice. State guidelines and support should include flexibility in selection of contextual supportive roles.

- Peer coaching/mentoring for new and experienced teachers in learning how to teach diverse students and connect to appropriate curriculum, assessment, and pedagogy. Focus may include diversity of students (listed above), curriculum (specific student standards, technology). A coach mentor may observe classrooms of colleagues, co-plan, co-teach, or provide on-the-job PLEs

with shared student- learning-growth accountability. A reflective cycle includes pre- and post-observation conferences and formative feedback on technology, data analysis, curriculum, instruction, assessment, management, standards, best practices, and teaching complexity in reflective process of NBPTS:

- o Analyze knowledge of students, ways students learn and student-learning growth data.
- o Identify goals for individual, small and whole groups of students.
- o Select appropriate instruction.
- o Assess and analyze learning data and connection to instructional choices.
- o Identification of new and worthwhile goals.
- New teacher induction programs for two years expanding the number of years to four years over the next six years that are developmental with coaches and identified PLEs determined through the coaching cycle as in peer coaching.
- Model teacher opens classroom for observation, pre- and post-conferences.
- Professional learning collaborative communities leaders.
- PLE specialist provides workshops, resources, webinars, discussions, and networking among teachers on all aspects of teaching.
- Lead/master teacher mentors teacher leaders in roles influencing practice, policy, and advocacy.
- Department/grade-level chairs or Building Leadership Team is a liaison among teachers and principals to develop/implement/monitor school improvement/PLE plans.

III. State Actions to Support Districts and Schools

Shared leadership and leading PLEs requires teachers to take risks and to take on unique roles that require unique knowledge and skills beyond teaching students. Teacher leader training should be ongoing and collaborative toward meeting high standards unique to their roles. The state should—

- Align Teacher Leader Endorsement programs to TLMS.
- Establish micro-credentialing system for teacher leaders to demonstrate TLMS function competencies for their particular role.
- Partner with NNSTOY TLMS training to revise/expand regionally through ROEs/ISCs and locally.
- Compile state report from district's impact reports through multiple measures for improved student-learning-growth, teacher retention/recruitment and school culture.

ISBE should convene face-to-face statewide and regionally and work online with representatives of all stakeholders led by teacher leaders to—

- Develop a tool for districts to analyze their readiness for developing a career pathway/lattice professional learning system so they may design their plans based on where they are and where they want to move on the continuum of continuous improvement.
- Audit and remove existing policies that are barriers to districts and schools implementing effective PLEs (e.g. credentialing, evaluations, scheduling, etc.)
- Build awareness of effective PLEs through teacher career pathways/lattice. Define effective professional learning.
- Develop school leadership team training (teacher leaders, principals and district administrators).
- Collect and disseminate online resources.
- Communicate definitions, models, and professional learning resources through a communication system.

- o Interactive recorded webinars
 - o Documents
 - o Website
 - o Online asynchronous platform for communication and network new and experienced teachers
 - o Social media
-

Hello,

My name is Patricia Huizar, I am the Illinois Partnership Advancing Rigorous Training (IL-PART) Grant Project Coordinator for the Andrew M. Greeley Center for Catholic Education at Loyola University Chicago. In Section 3.2 Identification of Schools p. 22, can there be a clear explanation how is the process going to work with Catholic Schools, or are we into the assumption that Catholic Schools fall into this category. In the past Catholic schools, often did not receive an equitable share of funds because of the way the allocations were calculated. I think is important to make that clarification.

Also, on Pg. 50 Section E. Parent, Family and Community engagement, I want to know how the parent and community engagement are going to be measured? I don't think schools are following the family engagement framework. "ISBE is pleased that there remains a set-aside requirement for parent and family engagement, with an allocation of more than \$500,000. Ninety percent of those setaside funds must be distributed to the schools, with a priority for high-need schools. Principal consultants will verify compliance with specific statutes regarding allowable use of funds during their review of the grant. This information will be shared through a webinar" Pg. 51 how are schools going to be evaluated when providing parent and family engagement? The parent engagement needs to be meaningful and focus on the needs of the school. Parents don't want to sit at a Curriculum Night to hear the principal talk about the Discipline policy. Documentation, power point presentations, and parents' evaluations should be included as evidence of what schools are doing to engage parents.

To Whom it May Concern:

The National Hookup of Black Women, Inc. is an organization that serves as advocates for women and their families. We work diligently to identify the gaps that affect the underserved and even more diligently to close them. We recognize that we have arrived at a time and place where employers are increasingly seeking out candidates who speak Spanish. Therefore, we have identified what we feel is another gap and that is the opportunity for the parents of children whose first language is English to have a choice for their students to be fluent in Spanish. We believe it is a gap because people-related jobs are not only seeking Spanish speaking applicants, but they are listing it on their applications as a preference. We are asking you to consider the proactive move to award children (grades K-8) a chance to be competitive in the job market and prepared to seek gainful employment. We are aware that early instruction will award them the awesome opportunity to become fluent, as opposed to taking the two-year high school requirement (or elective) when most will be only 2—4 years from jobs in a market that is laden with bilingual preferences. We realize that this is not a problem for parents that do not want it, or for parents that can and will simply go out and pay for it. We are asking for an action on your part for

the sake of parents who see the lack of acquiring this opportunity as something that might impede their children's future aspirations.

Thanking you in advance for your consideration,

Deborah Summers
815-690-8159

Dr. Helfer,

I have reviewed [AdvancED's response](#) to the first draft of Illinois' ESSA plan and am writing to provide my support. My district believes the adoption of AdvancED's continuous improvement framework as the state's model would be beneficial for all Illinois' districts and schools. As you know, Illinois has attempted, but to this point been unsuccessful, in creating an Illinois specific continuous improvement framework. Fortunately for Carlinville CUSD #1, we have been involved with the AdvancED organization for several years. Therefore, by using AdvancED's well researched, valid and reliable framework, our district has been able to improve our students' outcomes despite the demographic challenges we are experiencing.

If you would like to discuss this topic further with me, I would be more than happy to discuss this topic with you. Also, I appreciate your time on this effort. I realize you have a significant challenge ahead of you, and I will respect whatever decision you make. However, I strongly feel as if an excellent model already exists and has a proven track record. If you give the model a careful look, I believe you will draw the same conclusion.

Sincerely,

Michael J. Kelly, Superintendent
Carlinville CUSD #1

MULTIPLE SECTIONS

Dear Illinois State Board of Education:

I am writing on behalf of Ingenuity, which serves as the single source of data collection and dissemination, professional learning, and advocacy efforts for the arts education sector working with Chicago Public Schools (CPS). Ingenuity works in partnership with CPS—the nation’s third largest school district that educates 20 percent of Illinois’ student population. We have been encouraging stakeholders throughout Illinois to attend ISBE’s listening tour, to provide public comment both at the meetings and via the online submission, and have been working with our partners which include program providers, teachers, parents and community members, to educate them on the opportunities for the arts in ESSA.

Ingenuity submits the following recommendations and comments for Illinois’ Draft ESSA Plan:

Across Illinois’ ESSA Plan : In all sections where FINE ARTS is referenced, change FINE ARTS to FINE AND PERFORMING ARTS and define the five (5) recognized art disciplines (visual art, music, theatre, dance, and media arts) for which the state just approved learning standards.

Section 1111(b)(1)(C)-(D) : We ask that ISBE make the ARTS explicit in the section on Challenging Academic Standards, as the new Arts Learning Standards have been approved by ISBE.

Section 1201 : we ask that ISBE acknowledge that formula grant funds can/should be used to create a high-quality assessment for FINE ARTS.

Section 3.1 : We ask that ISBE keep the recommendation of the accountability work group to include the arts (listed as Fine and Performing Arts) as an Academic indicator, however we ask that the arts be defined as part of a well-rounded education, and not enrichment, as their current status in Illinois is as a core subject and are listed in the federal law as part of a well-rounded education.

We also ask that ISBE include the arts (as Fine and Performing Arts) as an Accountability Measure for School Climate and Engagement, as we believe the arts increase student, teacher and parent engagement and satisfaction.

Section 4.2-A : We ask that ISBE maintain the arts (as the Fine and Performing Arts) in professional learning supports, and that ISBE recognize the unique needs for provision of professional development in the arts, and make clear a recommendation that these federal funds be utilized to enhance arts professional learning, thereby enhancing student outcomes and increasing instructor retention and effectiveness across the state for arts and non-arts instructors.

Use of Title II : Because the Arts are unique in both their provision and program evaluation, we request that Title II specifies supporting appropriate professional learning opportunities for arts and non-arts instructors on the in-school-time provision of fine and performing arts education and arts integration activities. Arts integration provides schools with the opportunity to educate instructors and school leaders on the value of teaching the arts through other curricular subjects, and other curricular subjects through the arts.

Finally, Ingenuity asks ISBE to ensure that school districts understand that the arts can be funded through local, state, and federal STEM funding, as the federal definition of STEM now includes the arts.

On behalf of Ingenuity, thank you for the opportunity to make these recommendations and comments on ISBE’s first draft ESSA plan. I look forward in continuing to engage ISBE in our efforts to increase arts education equity, access, and quality.

Sincerely,

AmySue Mertens

Director of Public Affairs

www.ingenuity-inc.org

312-583-7463

Assessment

The state requirement of not assessing more than 1% using an alternate assessment for students with the most significant disability denies many students who are cognitively unable to complete a grade level assessment the option to use alternate assessment. The decision to use an alternate assessment should be based on cognitive indicators, not an arbitrary 1%.

ELs and n size

The state should change the n size for subgroups to 20 to match the Illinois School Code statute on Bilingual Education. For K-6 schools, 20 students spread across 6 grades is about 3 students per grade. For large districts of 100 per grade, this results in a very small sample size that is less accurate and more likely to be a fluke, or chance result. An n size of 50 would provide more accurate data on the performance of subgroups or reflect a certain percentage.

Accountability, Support and Improvement for Schools

With respect to the definition of improved student outcomes, is growth in the “all students” group sufficient, or must there be growth for under performing groups as well. Growth for all students is sufficient. Under performing sub groups may be inaccurately identified as underperforming based on small n sizes at a grade levels, or due to being in multiple groups which drives inaccurate decision making. For example, students in low income and other subgroups like EL, may be underperforming due primarily to one indicator and both subgroups are negatively impacted. As a result, a district may change instructional practices in one subgroup, even if they were effective, because the other indicator is not controlled for. All student growth is a more accurate indicator if a school is improving.

Identification of Resource Inequities

Staffing and Methodology formulas that include salaries do not result in equity of resources. A staff per pupil ratios may be a better indicator of resource equity. A highly paid teacher with many years of experience is not a more equitable resource than 2 newer teachers with lower salaries. This type of funding formula has the potential to send the oldest teachers with the highest salaries to the neediest schools, which would not ensure quality of teaching or equity of resources.

Title Funds-Dual Credit Credentialing

Allow for Title Funds to be used to support teachers to be dual credit credentialed.

Thanks,
Glenn

Glenn Wood
Assistant Superintendent, Curriculum and Instruction
Plainfield Community Consolidated School District 202
(815)577-4069

MULTIPLE SECTIONS

To Whom it May Concern:

Please find the following comments as a submission from the administrative team of Urbana School District #116. Please let me know you have any questions.

Sincerely,
Don

CCR Indicator Framework

*GPA 2.8 out of 4.0 -- Our concerns lie with the inequities and inconsistencies with grades and gradepoint averages across 800+ districts. This feels like it flies (once again) in the face of efforts to move toward standards-based grading and reporting and/or a competency-based education system.

*Readiness college entrance score on the SAT -- Regardless of the point that the SAT is a 'college readiness' indicator and not necessarily reflective of what is actually being taught and learned throughout our courses, we question what will be the determining cut score -- entrance into the University of Illinois or other state colleges and universities or entrance into the community college system.

Academic Benchmarks or Industry Credentials

*Industry Credentials -- Who decides? and What are we really looking at? If you go with the WorkKeys, do we really say that we are accepting as "industry credentials" an instrument that tops out at what students should learn by the end of 8th grade? If you go with entrance into an apprenticeship, how will you monitor that?

*Dual Credit Career Pathway Courses, AP Placement Exams, AP Courses, Dual Credit College English and/or Math, and IB Exams -- We question the fairness and equitableness of these indicators without sufficient funding from the state to credential teachers and provide access to these courses for students in every school.

Behavioral and Experiential Benchmarks:

*We fully support hours of Community Service (or military service)

*We would like further definition of "organized Co-Curricular Activities)

Page 18 and 19 -- Weighting of Indicators

*We would like to see examples of 'grades' or school performance levels as played out in your various weighted examples. From our district study of fair and equitable grading and reporting practices, we have plenty of examples where weights were applied to diverse categories with unintended consequences. Are you proposing to take the mean of all the scores, trends over time, or a preponderance of evidence approach or other when calculating the final performance level for schools and districts?

*Overall Proficiency Level on ACCESS for ELLs -- Please know that the Latino Policy Forum has a subgroup (Illinois Advisory Council on Bilingual Education) that is giving thoughtful consideration to this issue. Please consult with them before setting anything in stone.

*Goal Setting: Please know it takes time to move a barge. Anything less than five years for significant change is not likely to give us time to see the impact of the changes and innovative practices we want to implement.

Page 20 -- Performance Levels

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* Are you giving consideration to levels that might correspond to the Teacher Evaluation System: Unsatisfactory, Needs Improvement, Proficient, Distinguished?

* We encourage you to steer clear of grading schools (ABCDF) like Florida and so many other states and to frame whatever levels you ultimately land on in the most positive language possible.

Page 21 -- How might we avoid the "bubble syndrome"?

* Funny you should ask that specific question, because everything that we've read so far indicates that this will be just another way for districts/schools and leadership who lack the integrity that we'd like to think we hold ourselves to for gaming the system.

* We encourage the identification of student subgroups, but are hesitant to return to a system that counts one student negatively in 4 different subgroups.

* Addressing funding disparities -- seriously?! You know how to do this. Springfield doesn't have the political will.

* Defining growth -- we implore you to steer clear of value-added models!

* Defining achievement -- Can we find a way to have schools/districts identify local measures of achievement/success and report on that?

Donald D. Owen, Ed.D.

Superintendent

Urbana School District #116

205 North Race Street

Urbana, IL 61801

217.384.3636

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Good Morning,

Below I have listed some items that I am concerned about with the state plan.

1. In the March/April School Board Journal James Rosborg wrote an article highlighting the teacher shortage in Illinois. An estimate of a passing score on the TAP is equivalent to a 26 on the ACT. In October of 2015 there is a 21% passing rate. Out of 202 examinees only 42 have passed. African Americans and Hispanics have a less than 25% passing rate. Also, there is decrease in elementary teaching candidates at 14 state universities from 17% to 83% and secondary candidates from 20% to 83%. The reason I reflect on this is the discussion about increasing the ACCESS proficiency rates. Our district who is financially struggling, can not find a bilingual teacher. We have had a posting for 3 years. I would like to see the actual numbers of bilingual endorsed teachers graduating and compare that to the number of districts looking for bilingual teachers and the actual number of bilingual preschool teachers. It is an unrealistic expectation to increase ACCESS scores when there is an extreme teacher shortage and at 60% Title III funding, to expect districts to increase the accountability with a dysfunctional funding method in Illinois. I think there needs to be alternative methods identified in plans for meeting the needs of these students.

2. I also believe in local control of deciding which students should be taking the DLM. Currently the number is capped. But if an IEP decision is that the student is not capable of taking PARCC they should be allowed to take the DLM. Currently districts are picking children by the "eeny, menny, ,miny, moe"

MULTIPLE SECTIONS

method because of a 2% cap. We do not do this for students who need accommodations, I don't think we should be doing this for students who cognitively impaired. It is an illegal process.

3. Academic Indicators are another area of concern. Again without a equitable funding method in IL, many districts only are able to provide social work or counselors to students with IEPs. Our community has no local resources as well to support students living in or with trauma. Our nurse to student ratio is 1:600 because we can only afford the nurse to dispense meds. We no longer have a arts program or would ever be able to build a wrap around program. To continue to add mandates to districts who do not have the resources or to fund them at 40, 60 or 70% is ridiculous and needs to be addressed before a list of indicators is brought forward.

I hope the state considers the needs of these districts that do not have equitable funding before making a plan that imposes mandates and programs that are not fully funded.

Please feel free to contact me if you have further questions.

Anne McDonnell, Principal
Centennial Elementary School
614 Oakley Ave., Streator, IL
(815) 672-2747 Fax (815) 672-0594

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Good Afternoon,

My name is Eliza Bryant and I am a special education teacher at Roberto Clemente Community Academy in Chicago. I am also a member of Educators for Excellence, where I have been working with a cohort of talented Chicago teachers on a set of recommendations designed to improve the REACH evaluation system in CPS. One of the recommendations that we are most enthusiastic about would tap into the expertise of current educators by providing teachers with opportunities to collaborate, observe, and coach one another.

Schools that promote a culture of collaboration and an openness to collegial feedback are more likely to have higher performing students and happier teachers. I, and the teachers that I work with, would love to see the state recognize the existing expertise within our field and prioritize allocating Title II funds to set up Hybrid Teaching Positions. This would entail expert educators teaching for some part of the day and having set times to coach, provide feedback, and mentor their peers for the other. Permitting this time will provide teachers with an opportunity to develop their instructional practice in between their evaluative observations, thus, growing as educators and having a greater impact on students.

Thank you so much for your consideration.

Best,
Eliza Bryant

Section 4.2.A – regarding the suggested use of Title II funds for professional development and induction & mentoring programs. Assuming there are not enough funds for universal induction & mentoring, how will these be directed? I am concerned that districts with functioning I & M programs and staff – those most prepared to compete for grants – will have the advantage, thus the “rich get richer” while rural and low resource districts go wanting.

Section 4.3.A – not sure about the “or” provision in the proposed definition of an ineffective teacher. Should be one or the other, and I think the second one is better than the first.

Same section – definition of an inexperienced teacher. I recommend two years or less as the cutoff. That said, assuming a common set of shortcomings/developmental needs based solely on years of experience is overly simplistic.

--

Chris A. Roegge, PhD | Executive Director, Council on Teacher Education | University of Illinois at Urbana-Champaign | 505 East Green Street, Suite 203 | Champaign, IL 61820 | 217.244.9391 | croegge@illinois.edu

Good Afternoon,

My name is Donna Seals and I'm a Chicago Public School Librarian and a member of Educators 4 Excellence in Chicago. I am writing to give feedback on Section 4.2A Pages 35-37. I work with an awesome group of talented educators who would greatly benefit from time set aside during the school day to collaborate, coach and observe one another. This benefit would have a direct positive impact on student achievement as well. I would love to see the state recognize the expertise within our field

and prioritize allocating Title II funds to set up Hybrid Teaching Positions, where expert teachers teach for some part of the day and have set times to coach, provide feedback and mentor their peers. Creating these Hybrid Roles allows for career growth within the education field while still valuing the craft of teaching.

Thanks for your time and opportunity to provide feedback.

Educationally Yours,
Donna L. Seals, Ed. D.

Hello-

We should eliminate the student growth component of evaluations due to the fact that there are a lot of inequities, such as the specialists who only see their students once a week or the PE teachers who have classes that are twice the size of the academic courses. Other educators, counselors and librarians, don't even have the growth component because they don't have any measurable growth with the students they see. Obviously, this causes an inequity issue with the educators who are required to show student growth. With the current issues, to ensure fairness and equity to all , the student growth component should be eliminated.

Greetings,

As a new principal, and a member of Educators 4 Excellence's "Teacher Diversity Working Group" in Chicago, I valued my education at Columbia University's Teachers College as it, I believe, adequately prepared me to serve my teachers, staff, parents, and students by:

- (1) ensuring that I understood how to create safe spaces by engaging in discourse surrounding race, class, gender, religious, and sexual identity in order to establish equality of opportunity,
- (2) requiring that I knew how to consistently respond to external factors - historical, legal, and social - that may influence the school community,
- (3) introspectively identifying and reflecting a deep understanding of my own identity based upon race and class and use that awareness to take actions and inform decision-making in complex and unfamiliar situations,
- (4) providing adequate training and resources to successfully resolve conflict and empower others to do the same through active listening, understanding motivations and opposing viewpoints, mediation, negotiation, perspective-taking, and finally,
- (5) guiding me on how I can consistently identify how I am perceived and seamlessly adjust my behavior in the moment to achieve a positive outcome.

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The above is what I believe all educators need to be successful educators, regardless of their capacity. Such training must constitute "Supporting Excellent Educators (Section 4, page 33)," that is, the aforementioned skills are transferable to teachers as they [the skills] will, proactively, assist in developing, retaining, and advancing our educators. Doing so, I believe, will translate into (1) more teachers of color who feel adequately prepared to effectively teach low-income and minority students with less implicit bias, and (2) provide the initial steps to build a foundation of support necessary to help retain teachers in hard-to-staff schools.

--

Cory L. Cain
Assistant Principal
Urban Prep Academy for Young Men - West Campus
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WE BELIEVE.

Urban Prep is commemorating its 10th year anniversary with #10AndChange: a campaign, centered on the achievements of Black boys and young men, that will CELEBRATE positive stories, ENGAGE community support, and INSPIRE commitment to changing the narrative. For more information, visit www.urbanprep.org/change.

My name is Melissa Miller, and I am writing on behalf of the Teacher Diversity Working Group at Educators 4 Excellence. I am also a teacher at Chicago Public Schools. The group is particularly interested in retaining teachers of color in public schools, and my comments focus on that aspect of this plan.

Section Number: 4

Page Number: 33

Comment: Teachers need to be better trained to work with low income and minority students. I would like to see more information in the draft about rigorous, and culturally sensitive diversity training as part of teacher prep coursework as well as diversity training at the principal level. There is a lot of research that shows that teachers trained in cultural diversity are good for students. This factor is directly tied to student achievement. Additionally, there is research that shows that a diverse teacher workforce correlates positively to students achievement. For that reason, I would also like to see steps in the plan that lead to a more diverse teacher workforce. In Illinois, Black teachers make up 10% of the teacher population, but 14% for the workforce and 15% of students. Latino teachers make up only 6% of the teacher population, but 16% of the workforce population, and 24% of our student population. Therefore, it is important to address preparing new educators to work with low-income

and minority students by hiring minority teachers. Below are some articles that show the research on this and talk about what that looks like in Illinois:

- "Illinois' Educator Workforce: Changes from 2002-2012," Bellwether - This article breaks down the demographics of Illinois teachers and their changes, and is what Jim referenced yesterday in the packet we discussed.
- "Teacher Diversity Revisited: A New State-by-State Analysis," Center for American Progress, 2014 - This report highlights the teacher diversity gap nation wide, and discusses the implications of that gap.
- "The State of Teacher Diversity in American Education," The Shanker Institute - This article reports on a the benefits of diverse teacher workforces, and outlines a few studies that link teacher diversity to higher student achievement.
- "Diversifying the Teaching Force: An Examination of Major Arguments" Montclair - This also breaks down research that indicates that diverse teaching force leads to higher achievement. The authors refer to one of the first studies of the STAR in Tennessee, found here: <http://www.nber.org/papers/w8432.pdf>.

Section Number: 4

Page Number: 36

Comment: I would like to see a plan to use Title II funds to support educators and school leaders through diversity training. I would also like to see it go to programs that recruit and train minority teachers, similar to programs like Grow Your Own. See the recommendations above on justification of this.

Section Number:3

Page Number: 21

Comment: We should include teacher retention data and teacher satisfaction data by racial demographic. Teacher prep schools need to be held accountable for a) who they are recruiting, b) what they are training them in, c) how well they are preparing teachers of all demographic areas to ensure success for low income minority students, and d) where those teachers are being placed.

Similarly, we should hold principals accountable for ensuring that they are creating an equitable work environment that supports teacher of color, that in turn support their students. I would like to see districts and schools report their hiring and retention of teachers disaggregated by race, among other factors.

The state plan is silent on any changes regarding teacher evaluation, specifically tying teacher evaluation to student performance growth.

ESSA does not require PERA. For myriad reasons, PERA should be repealed:

1. There are too few (if any) rigorous research studies that demonstrate a link between student achievement and teacher performance ratings in a single given year;
2. PERA, as constructed, relies on assessments (Type III's) that are definitely not valid and reliable, at least not for the purposes of PERA;
3. PERA creates far more work (for administrators and teachers) than benefit (for anyone, least of all students), causing yet more resources to be misdirected from where they should be

TEACHER EFFECTIVENESS

allocated, actually improving teacher performance through research-proven methods such as structured teacher collaboration, instructional coaching, and high quality instructional resources (materials).

If any legislation or resources are allocated for something to establish the link between student performance and teacher rating, then the state should find the most rigorous research upon which to establish a large-scale pilot in a K-12 district and have the pilot validate the research in an Illinois school district context. Then what the pilot demonstrates should become the basis for subsequent legislation.

Sincerely,

Kaine Osburn, Superintendent
Lake Zurich CUSD 95
Lake Zurich, IL
(847) 540-4964



Friday, October 7, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #1

Dear Dr. Smith,

Thank you for the opportunity to respond to the first draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

Action for Healthy Kids® (AFHK) is a nationwide grassroots network mobilizing school professionals, families and communities to take actions that improve school foods, nutrition education, physical activity, and physical education for all students. Through funding opportunities, expert technical assistance, and our flagship program, Game On, Action for Healthy Kids supports schools in developing healthy environments where children thrive. To learn more about the ways our 100,000+ volunteer network is helping to make every kid healthy, active and ready to learn, visit www.actionforhealthykids.org.

Our state chapter in Illinois, Illinois Action for Healthy Kids, is a multi-sectoral coalition that includes a robust group of state and local partners that come together to work on community- and state-level nutrition and physical activity initiatives. IL AFHK is committed to increasing its work directly with schools and districts by building its membership and utilizing proven programs that generate excitement about healthy schools.

Together, we can make schools places where staff, children and their families learn and adopt lifelong healthy habits. Our state teams promote grassroots efforts to employ new systems, inspire new policies and change the health environments and practices of our schools. We provide a full spectrum of resources – including grants for school breakfast, physical activity and playground equipment, health and nutrition curriculum, school gardens, education materials and more – as well as training for school health teams, administrators, teachers and other school professionals, parents, and community members. Our comprehensive flagship program, Game On, provides all the information and resources a school needs to host a successful school health program that earns them national recognition as a health-promoting school. All of our programs and efforts are dedicated to

achieving the goal of Every Kid Healthy™: All U.S. schools provide healthy foods, quality health and physical education, and comprehensive physical activity for all students by 2030.

In our comments, AFHK provides recommendations to the Illinois State Board of Education (ISBE) on improving the state plan, responses to the questions raised in the proposed Illinois state plan, and supplemental background information to justify our recommendations. Additional information is available upon request.

Sincerely,

Rob Bisceglie, MA
CEO

Summary of Action for Healthy Kids (AFHK) Recommendations

The Every Student Succeeds Act (ESSA) presents Illinois, and the rest of the nation, an opportunity to foster partnerships and a system that promotes the whole child through schools that address student health and wellness.

At Action for Healthy Kids (AFHK), we mobilize schools, parents and volunteers in support of school-based nutrition and physical activities that lead to lifelong healthy habits and learning. Through this work, we see first-hand the hurdles created by placing an undue burden on schools by focusing on short-term achievements in core subject and collateral areas as prescribed by No Child Left Behind (NCLB) instead of looking to the longer, and often more profound, benefits of taking a whole child approach that incorporates health and wellness.

While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting the health and wellness of students.

AFHK strongly recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school report cards. The accountability system and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement, while helping school officials recognize areas where improvement would lead to long-term academic benefits and help organizations such as AFHK target community assistance where it is needed.

Additionally, educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child and setting positive examples in their actions and practices.

This comprehensive, whole child approach will create a state plan that is supportive to school districts and schools, and most importantly, students, while better enabling the greater community to support schools.

Toward that end, AFHK recommends:

- Accountability measures for school quality and indicators on the school report card should be designed in such a way as to encourage schools to provide:
 - Age-appropriate, culturally sensitive nutrition education;
 - Physical education that is standards-based to develop the knowledge, skills, behaviors, attitudes, and confidence needed to be physically active for life;
 - The provision of 60 minutes of daily physical activity (including physical activity incorporated into physical education);

- High percentage of eligible students participating in free or reduced priced school meals with breakfast and lunch;
- Access to healthy foods and beverages whenever food is served, sold, or shared on campus;
- Communicating and working with students, families, staff, and the community to promote the adoption of healthy eating and physical activity among students;
- Involvement of students, families, and community members on school health/wellness teams;
- Motivation of students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity;
- Access by students, through the school, to community resources to help provide healthy eating and physical activity opportunities.
- Accountability measures for school quality and indicators on the school report card should include:
 - **Aggregate fitness testing scores.**
 - Other **overall school wellness and whole child health-related indicators on school report cards** to illustrate various aspects of a healthy school environment. These could include:
 - Incorporation of compliance with federal and state Local School Wellness Plan rules and other measures, and self-evaluations of overall school and student health and wellness in such ways that includes strategies for nutrition education, physical education, physical activity, and nutrition guidelines for all foods available on the school campus.
 - Whether or not districts/schools meet federal and state nutrition standards for school meals/smart snacks.
 - Whether a school has a health team/wellness that meets quarterly throughout the school year to support the development, implementation, monitoring, evaluation, and regular revision of their district’s school health and wellness policy and plans.
- **Designing assessments for health, physical education, and social emotional learning** that are aligned with the state’s existing (or emerging) standards to ensure that school districts are offering students a well-rounded education.
 - AFHK recommends that Illinois State Board of Education (ISBE) use existing tools to have schools self-evaluate the strength of their wellness policies, such as use of the Centers for Disease Control and Prevention (CDC)’s School Health Index (adopted by Action for Healthy Kids) and the U.S. Department of Agriculture’s HealthierUS School Challenge: Smarter Lunchrooms (HUSC:SL) recognition program. Again, making this information standardized and easily accessible by potential community partners.
 - While the HUSC:SL is designed at the federal level as a certification, AFHK has developed a system for using the School Health Index as a readiness assessment for HUSC:SL application. We recommend ISBE do the same.
- To support that, AFHK recommends that the ISBE, with the help of community partners, such as AFHK, provide technical assistance and guidance to school districts on

comprehensive needs assessments that consider factors related to nutrition, physical education and physical activity, use evidence-based interventions designed to address identified needs, and recommend professional development for educators on optimally addressing the needs of students.

- AFHK recommends that Illinois use standardized reporting of data in schools that can then be shared with organizations, such as ours and our Every Kid Healthy Coalition, so that community partners can identify and highlight success stories, while matching available resources to schools identified as being in need of assistance.

Table 1: Summary of Recommendations for Accountability Measures, School Report Card Measures, Needs Assessment, Evidence-Based Practices, and Professional Development

	Recommendations
Accountability Measures	Aggregate student fitness scores
School Report Card Measures	<ul style="list-style-type: none"> • Percentage of students in the Healthy Fitness Zone (HFZ) for required fitness tests • # of days of PE (already included) • Daily recess offered • Policies for requiring physical activity or movement during the day • Policies encouraging students to bike or walk to school • Average class size for physical education, by grade • Number of qualified PE teachers • Students granted physical education waivers • % of students with disabilities that participate actively in physical education classes. • Strength/comprehensiveness of a school’s wellness policy (such as through the use of the WellSAT tool)
Needs Assessment	<p>One of the following:</p> <ul style="list-style-type: none"> • The CDC’s School Health Index, specifically the Physical Education and Other Physical Activity Programs module (Module 3), • Action for Healthy Kids School Health Index which is used as an assessment of a school’s readiness to apply for USDA’s HealthierUS School Challenge: Smart Lunchrooms (HUSSC:SL)
Evidence-Based Interventions	<ul style="list-style-type: none"> • CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school • Enhanced Physical Education includes details on specific

	evidence-based interventions recommended in the CDC’s <i>Guide to Community Prevention Services</i>
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Professional Development	<p>ISBE should support schools’ adoption of physical activity policies and practices by encouraging professional development on these content areas. Professional development opportunities to consider include:</p> <ul style="list-style-type: none"> • Professional development opportunities for administrators to help them understand and communicate the movement/improved learning outcomes connection, as well as the way that is linked to fitness testing • Professional development opportunities for physical educators on implementing high quality Enhanced Physical Education (EPE) programs • Professional development resources for integrating physical activity in the classroom <p>ISBE should offer professional development or could link educators with other groups in the field that provide learning opportunities, including many that are free for participants. Groups such as Action for Healthy Kids offer a wide range of opportunities, including webinars, podcasts and in-person training sessions.</p>
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Specific Citations of Recommendations to Draft Plan #1

Recommendations pertaining to:

- 2.1 CHALLENGING STATE ACADEMIC STANDARDS - A. Challenging Academic Content Standards and Aligned Academic Achievement Standards (pg. 6)
- 2.2 ACADEMIC ASSESSMENTS - A. Student Academic Assessments (Pg. 7)
- 3.1 ACCOUNTABILITY SYSTEM (pg. 13-22)

ESSA requires schools to offer students a “well-rounded education.” To this end, Illinois not only set standards by which students are measured in their progress of achieving a well-rounded education, but also assesses schools in their positioning students for success.

The ESSA definition of well-rounded education includes health education, nutrition education, and physical education, and gives Illinois, and other states, the flexibility to further expand that definition.

Each state plan must provide an assurance that the state has adopted challenging academic content and high quality student academic assessments in a number of subjects like math,

reading or language arts and science and may develop standards and implement assessments in other subjects.

Assessments

Given that Illinois already has standards for health education and physical education, AFHK recommends implementing assessments for these areas. AFHK further recommends that indicators and assessments should be designed to encourage schools to provide:

- Age-appropriate, culturally sensitive nutrition education;
- Physical education that is standards-based to develop the knowledge, skills, behaviors, attitudes, and confidence needed to be physically active for life;
- The provision of 60 minutes of daily physical activity (including physical activity incorporated into physical education);
- High percentage of eligible students participating in free or reduced priced school meals with breakfast and lunch;
- Access to healthy foods and beverages whenever food is served, sold, or shared on campus;
- Communicating and working with students, families, staff, and the community to promote the adoption of healthy eating and physical activity among students;
- Involvement of students, families, and community members on school health/wellness teams;
- Motivation of students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity;
- Access by students, through the school, to community resources to help provide healthy eating and physical activity opportunities.

Developing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on the effect of instruction on student acquisition of knowledge and skills, based on state standards, will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas, and help community support to be directed efficiently to where it is most needed.

We do not recommend that these assessments be used in state accountability systems or in a punitive manner; rather these assessments should be used to improve teaching and learning in these critical content areas, highlighting successes, and directing community support activities.

We do recommend that ISBE, with the assistance of community partners, such as AFHK, provide technical assistance and guidance to school districts on comprehensive needs assessments that consider factors related to nutrition, physical education and physical activity, use evidence-based interventions designed to address identified needs, and

recommend professional development for educators on optimally addressing the needs of students.

Fitness testing score as an accountability measure

Action for Healthy Kids recommends including aggregate fitness testing scores as an accountability measure for school quality and as an indicator on the school report card.

Based on the correlation with student achievement and ability to provide actionable information to educators to improve school environments, Action for Healthy Kids recommends that the state accountability system use district reporting on the number of students that score within the Healthy Fitness Zone (HFZ) for the fitness tests the state is requiring as of the 2016-17 school year as one of the indicators of school quality and student success.

Rationale: Beginning in 2016-17, all Illinois schools are required to administer, using the Fitnessgram protocols, and report fitness assessment data for the following components of fitness: aerobic capacity, muscular strength, muscular endurance, and flexibility.

The proposed indicator meets the US Department of Education’s proposed requirements for these measures, as shown below.

Table 2: Proposed Accountability Measures Meet US Department of Education’s Proposed Requirements

	Fitness assessment data
<i>Is valid, reliable and comparable across all LEAs in the state</i>	✓
<i>Can be disaggregated for each subgroup of students</i>	✓
<i>Includes a different measure than the state uses for any other indicator</i>	✓
<i>Is supported by research finding a connection to student achievement</i>	✓
<i>Aids in meaningful differentiation among schools by demonstrating varied results across schools</i>	✓

AFHK wants considered only items that are within the schools’ nexus of control. This is an important point in regards to HFZ data. Public Act 98-059 specifically prohibited using fitness scores to grade students or evaluate teachers because there are many factors that

influence students' fitness levels outside of physical education. However, assessing students' fitness levels and improvement over time can provide important information for schools and educators to make adjustments to programs to better meet student needs.

According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being. Physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during, and after school to ensure that their students are ready to learn.

The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality physical education, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use Fitnessgram assessments to measure students' progress towards the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance, and muscular strength. School districts are required to report aggregate data to ISBE by May of each year.

AFHK recommends ISBE leverage the aggregate fitness assessment data as an accountability measure to assess school quality and student success over time. As data systems are developed, ISBE should also include the year-to-year differences in district reporting of the number of students that score within the Healthy Fitness Zone for the required fitness tests on the school report cards to track improvements over time.

Illinois' State Report Card: Maintain Existing Health-Related Measures and Add Additional Measures

AFHK recommendations around school report cards are designed to reinforce and provide parents and others with information that creates a more comprehensive picture of a school's focus on the whole child and efforts for continual improvement around attendance and student health and wellness.

Illinois currently includes measures about physical education on the school report card, which AFHK supports maintaining and enhancing. In addition, AFHK recommends that ISBE include additional measures on school report cards that relate to and/or informs student health and fitness. These potential additional measures could include but are not limited to:

- Age-appropriate, culturally sensitive nutrition education;
- Physical education that is standards-based to develop the knowledge, skills, behaviors, attitudes, and confidence needed to be physically active for life, including:
 - Average class size for physical education, by grade
 - Number of qualified PE teachers
 - Students granted physical education waivers

- Percentage of students with disabilities that participate actively in physical education classes
- The provision of 60 minutes of daily physical activity (including physical activity incorporated into physical education), including:
 - Daily recess offered
 - Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- High percentage of eligible students participating in free or reduce priced school meals with breakfast and lunch
 - Including school breakfast participation
- Access to healthy foods and beverages whenever food is served, sold, or shared on campus;
- Communicating and working with students, families, staff, and the community to promote the adoption of healthy eating and physical activity among students;
- Involvement of students, families, and community members on school health/wellness teams;
- Motivation of students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity, such as:
 - Policies encouraging students to bike or walk to school
- Access by students, through the school, to community resources to help provide healthy eating and physical activity opportunities;
- Strong local school wellness policies and implementation and revision practices, including:
 - Incorporation of compliance with federal Local School Wellness Plan rules and other measures and self-evaluations of overall school and student health and wellness in such ways that includes strategies for nutrition education, physical education, physical activity, and nutrition guidelines for all foods available on the school campus
 - Whether a school has a health/wellness team that meets regularly throughout the school year to support the development, implementation, monitoring, evaluation, and regular revision of the school health and wellness policies and plans
 - As of 2007, Illinois established a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy. AFHK recommends that ISBE integrate an indicator of the strength and comprehensiveness of the wellness policy, using a nationally recognized tool for measuring the strength of wellness policies, such as WellSAT, in the school report card.
 - In addition, AFHK recommends ISBE use existing tools to have schools self-evaluate the strength of their practices to implement the district's wellness policy, such as use of the Centers for Disease Control and Prevention (CDC)'s School Health Index or the Action for Healthy Kids School Health Index which

provides schools with a readiness score to apply for the U.S. Department of Agriculture’s HealthierUS School Challenge: Smarter Lunchrooms (HUSC:SL).

Recommendations pertaining to: 3.3 STATE SUPPORT AND IMPROVEMENT FOR LOW-PERFORMING SCHOOLS - A. Allocation of School Improvement Resources (pg. 27-30)

AFHK recommends ISBE encourage the existing self-evaluation tools, such as use of the Centers for Disease Control and Prevention (CDC)’s School Health Index , which AFHK has made more easily accessible through our Action for Healthy Kids School Health Index, and the U.S. Department of Agriculture’s HealthierUS School Challenge: Smarter Lunchrooms Recognition Program (HUSC:SL). AFHK recommends then making this and other needs assessment information standardized and easily accessible by potential community partners.

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools and Design Evidence-Based Interventions Based on Findings

Comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development, and health. For example, by assessing student fitness outcomes, schools can make adjustments to physical education programs to better meet student needs or determine whether or not they need to increase the opportunities for students to be physically active before, during, and after school. ISBE can work with partners to provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Fortunately, several publicly available tools also provide guidance on action planning to make improvements in the school environment. These tools include:

- The CDC’s [School Health Index](#), specifically the Physical Education and Other Physical Activity Programs module (Module 3)
- [Action for Healthy Kids School Health Index](#) which is used as an assessment of a school’s readiness to apply for USDA’s [HealthierUS School Challenge: Smart Lunchrooms](#) (HUSC:SL)

The Action for Healthy Kids, Let’s Move Active Schools and the Alliance for a Healthier Generation’s assessments mirror the School Health Index. Schools might already have engaged in one of these assessments within the two previous school years. Conducting these assessments assists schools by helping them create action plans, connect to resources and funding opportunities, and potentially apply for national recognition.

AFHK recommends that ISBE promote Enhanced Physical Education (EPE), an evidence-based intervention recommended in the CDC’s Guide to Community Prevention Services, which is defined as programs that increase the length of, or activity levels in, school-based physical education classes. AFHK also recommends that ISBE promote the CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school.

Additionally, AFHK recommends that needs assessments ask schools if they are eligible for the “Community Eligibility Provision” for school lunch programs, and if they are, if they are taking the option. Including this question about the provision will help schools identify potential food and nutrition benefits for their students that they can leverage to promote health.

Recommendations pertaining to: 4.2 SUPPORT FOR EDUCATORS (pg. 35-41)

Preparing Educators to Support Students’ Achievement and Health

As schools refine their approaches to addressing the needs of all learners, educators will require supplemental training methods for promoting high-quality EPE programs and school environments that maximize opportunities for physical activity and nutrition education. Although ISBE proposed a list of potential professional learning opportunities, other emerging issues might also be added to the proposed list and some topics seemed redundant.

ISBE should support schools’ adoption of physical activity policies and practices by encouraging professional development on these content areas. Professional development opportunities to consider include:

- Professional development opportunities for administrators to help them understand and communicate the movement/improved learning outcomes connection, as well as the way that is linked to fitness testing
- Professional development opportunities for physical educators on implementing high quality PE programs
- Professional development resources for integrating physical activity in the classroom

ISBE should work with partners to offer professional development to educators, including many that are free for participants. Groups such as Action for Healthy Kids, the Alliance for a Healthier Generation, and SHAPE America offer a wide range of opportunities, including webinars, podcasts and in-person training sessions.

Recommendations pertaining to: 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS - A. (pg. 41-45)

Any definition of what to include for determining a well-rounded student needs to take into account the whole child and recognize that school-wide health and wellness efforts are not only supportive of academic standards achievement, but are promoting healthy and wellness practices that students can use for the rest of their lives.

Recommendations pertaining to: 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS - B. Equitable access. (pg. 45-47) & - C. School conditions for student learning ... (pg. 47-48)

AFHK recommends that ISBE adapt the plan to better recognize and address negative health and wellness issues facing students and need, in some cases, greater school-based whole child health and wellness interventions to create an equitable academic environment. In other words, ISBE should see the health and wellness hurdles faced by students as obstacles to equitable access to well-rounded and supportive education for students and then work with schools to have in place strategies and resources to counter those hurdles with school-based whole child health and wellness efforts.

Recommendations pertaining to: 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS - E. Parent, family, and community engagement (pg. 54-55)

ISBE, through the state plan, encourages involvement of students, families, and community members on school health/wellness teams.

Additionally, schools should be motivating students, families, and staff to participate in school-based programs and activities that promote healthy eating and physical activity.

A major component of effective community involvement revolves around data and organizations being able to see where schools are in need of assistance in what areas. To this end, AFHK recommends that Illinois use standardized reporting of data in schools that can then be shared with organizations, such as AFHK and our Every Kid Healthy Coalition, so that community partners can identify and highlight success stories, while matching available resources to schools identified as being in need of assistance.

Recommendations pertaining to: 5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS - G. Other state-identified strategies (pg. 50-53)

As indicated throughout our comments, whole school health and wellness practices focused on the whole child are not only support of academic success, they are learning in and of themselves and their successful incorporation and implementation are important aspects of a well-rounded student. A well-rounded student is one that has learned healthy practices that they can then apply for the rest of their life. Thus we strongly recommend that recognizing and incorporating health and wellness promotion into how Illinois defines and measures what it means to work toward a “well-rounded student.”

Support Behind Recommendations

The Learning-Health Connection

As many of our partner organizations have pointed out, the link between health and learning is clear – healthy, active, and well-nourished children are more likely to attend school, be ready to learn and stay engaged in class, and healthy whole school environments and learning lead to healthy lifestyles into adulthood. The learning and practices our

students experience in school should be what we want them to practice for the rest of their lives, and this should include whole child health and wellness.

Despite widespread agreement on these facts, many school environments lack the resources and support to comprehensively promote health. Too many students do not have access to high-quality daily PE, incorporation of physical activity throughout the day, nutritious food, implementing and promoting other whole school wellness practices, providing the training and support for school personnel in these areas, and even being able to take advantage of available community support.

This challenge is especially critical in light of the nation's vast health and educational disparities. Low-income and minority students are at increased risk of health problems that hinder learning, and otherwise have limited opportunities to experience healthy practices and learning. These students are more likely to attend schools with unhealthy environments and face awareness, tools, and funding to put in place whole school, evidence-based prevention and health and wellness promoting programs and practices. Unless we address these disparities in health status and school environments, efforts to close the education achievement gap will fall short.

We see examples of where the State of Illinois recognizes the link between health and learning. Existing state policies require or encourage schools to address a range of issues including social and emotional learning, physical education and fitness, and nutrition. In fact, one of the goals of the current state plan is for every school to offer a safe and healthy learning environment for all students.

Physical Education: We applaud Illinois in being a leader in valuing children's health – long requiring daily physical education (PE) for students in grades K-12. We also point to the 2012 Public Act 97-1102, which established the Illinois Enhance PE Task Force (EPETF), charged with promoting and recommending enhanced PE programs that could be integrated with broader wellness strategies and health curriculum in elementary and secondary schools, and revising the State Learning Standards on Physical Development and Health to reflect the rich body of neuroscience on the connection between movement and improved student outcomes, as well as bringing them into alignment with current best practices.

One of the EPETF's recommendations was to develop and utilize metrics to assess the impact of enhanced PE and measure the effectiveness of State Goal 20 of the Illinois Learning Standards for Physical Development and Health, which is to help students to achieve and maintain a health-enhancing level of physical fitness based upon continual self-assessments. This recommendation led to advocacy for Public Act 98-0859, which was enacted to implement fitness testing in Illinois starting in the 2016-17 school year.

Further demonstrating the state's commitment to the whole child, in 2011 Illinois recognized the need to incorporate health and wellness measures into the school report card by, as of 2016, requiring all Illinois public schools to report the average number of days of P.E. they provide per week per student.

Physical Activity: Physical activity (PA) goes beyond physical education. Physical education (PE) is a planned sequence of developmentally appropriate activities and games that educates students about and through movement, and is taught by qualified teachers who assess student knowledge, and motor and social skills to establish and sustain a healthy lifestyle. Physical activity can be offered by schools before, during, and after the school day and can and should be both structured and unstructured in nature. It is critical to ensure students get the recommended 60 minutes of PA per day, as recommended in the [Physical Activity Guidelines for Americans](#).

School wellness policies and related matters: In 2007, ISBE codified this by establishing a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education, and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy. ESSA provides an opportunity to further integrate these practices into our whole child approach to education through their incorporation into school assessment and report card requirements.

ESSA: A new opportunity to supporting student health and wellness

ESSA presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting student physical and mental health and wellness.

Given the importance of student health and the key role that schools can play in promoting student health and wellness, incorporating health and wellness into Illinois' state plan in a comprehensive and integrated fashion will provide educators, policymakers, and the public with a more complete understanding of how student health and wellness are impacting learning and academic outcomes and can serve as a decision-making compass, not stigmatizing parents and students or blaming districts/educators, but, rather, helping schools and school districts effectively drive improvement strategies. If accountability systems recognized the full experience of a student – including health conditions that might impede learning – educators could develop a more comprehensive understanding of student performance, and could deploy resources to schools and students at greatest risk. Parents and community members also benefit from knowing more about how their schools are supporting and promoting student health and well-being.

Conclusion

Action for Healthy Kids values the opportunity to comment on Illinois' proposed plan to update our state system for educational accountability, school improvement, and educator preparation, support, and retention. AFHK greatly appreciates Illinois' long-standing commitment to student achievement, health, and development and its actions to support students. We urge you to continue to advance your work by recognizing the importance of student health and wellness practices not only to improve attendance, in class attention,

and other related issues, but in providing direct learning by students toward becoming well-rounded students with healthy life-time practices. We look forward to your leadership on these critical issues and stand ready to assist.

October 7, 2016

Illinois State Board of Education

100 N. First Street

Springfield, IL 62777

essa@isbe.net

RE: Comments on the first draft of ISBE's ESSA State Plan

To Whom It May Concern

Advance Illinois advocates for a healthy public education system that prepares all students for college, career, and democratic citizenship. As an objective voice committed to supporting and improving Illinois students' academic performance, we greatly appreciate the opportunity to offer feedback as the Illinois State Board of Education develops a fair, clear, and supportive plan for the implementation of ESSA. Our comments on the draft plan are organized below.

Section 1: Consultation and Coordination

1.1 Timely and Meaningful Consultation

Under 1.1Ai, we ask that the ISBE listening tours provide more informational materials to provide context of the ESSA law to community members and structure the meeting to include an emphasis on the overall system. The topics highlighted in the reader's guide and listening tour presentation appear to highlight the same concerns that Advance Illinois has addressed when discussing ESSA with stakeholders. It would be helpful to have additional information from the State Board that allows community members and stakeholders to further engage on these topics. More specific areas for information, in addition to the ones listed by the State Board, include:

- Academic goals for the state
- Relative weighting of academic measures and school quality metrics
- Highlighting the performance of subgroups
- Different models for growth and the weighting of growth versus proficiency metrics
- Use of growth in accountability for high school
- Approaches to categorizing schools including considerations regarding summative ratings
- Use of Title I funds for school improvement purposes
- Use of Title II dollars that can be used by the state

Section 2: Challenging State Academic Standards and Academic Assessments

2.1 Challenging State Academic Standards

As described in 2.1A, we encourage ISBE to ensure that the IL learning standards are implemented at a consistent, high level, across all districts.

As required in 2.1C, we support the approach that ISBE has taken to aligning English Learner standards with the state’s content standards. We would encourage the state to update its Spanish Language Arts standards in alignment with the Illinois Learning Standards. In addition, we would recommend that the State Board continue the practice of EL proficiency assessment K thru 12 (as opposed to 3-12 that as required by ESSA).

2.2 Academic Assessments

Under 2.2Ai, we applaud ISBE’s continued use of PARCC for grades 3-8 and its commitment to well-developed items that require significant depth of knowledge and measure a broad spectrum of student performance. Additionally, we encourage ISBE to continue to assess SAT’s alignment with standards and its ability to be used as a placement assessment into higher education. Recognizing that the state no longer plans to administer “End of Course Exams” statewide, we would encourage the state to consider other approaches to support districts’ consistent implementation of the Illinois Learning Standards in high school.

As required by Public Act 99-0674, we encourage the State Board to work with the Illinois Community College Board and the Illinois Board of Higher Education to adopt a multi-measure benchmark for readiness for credit bearing work in college that can be used to help determine students’ need for additional supports in their senior year of high school to prepare for college credit work.

As outlined by section 2.2Aiv, we commend ISBE’s policy of instructing core content in the native language of EL students. We suggest that ISBE incorporate methods to track the long term progress of EL students. Likewise, Advance Illinois wishes to highlight that the English language assessment should be used to track growth toward English language proficiency—not to hurry students into English only instruction. We are encouraged by ISBE’s current emphasis on the progress of ELs, however, it is important that the approach to using this assessment for accountability purposes does not push schools into avoiding this best practice.

Under 2.2Av, although ESSA allows for an assessment of local choice, we encourage ISBE to adopt one standard assessment for the purposes of accountability across all schools. In addition, we would like ISBE to strongly consider the implementation of the PSAT and PSAT 8/9 so that all students have a similar prior assessment experience before the SAT and to allow for the development of a growth model in high school to be used in the accountability system.

Section 3: Accountability, Support, and Improvement for Schools

3.1 Accountability System

We encourage ISBE to adopt an accountability system that is fair, clear, and supportive.

- Fair, meaning the system appropriately measures school performance, and is not significantly biased against schools just because of their demographics or context.
- Similarly, the system should be simple enough for parents and educators to understand with a clear indication of school performance.
- In terms of support, we advocate for a system that provides the appropriate supports to schools based on their context and practices.

As ISBE develops its approach to weights and scoring, we would like to draw attention to the different elements that impact ratings. This includes the choice of metrics, the scale of the metrics, the variation of score on each metric, and any cut points that may be used for performance either on an individual metric or for categorization based on overall scores. We urge ISBE to adopt a scoring system that promotes simplicity in scoring and is unlikely to lead to unintended consequences.

Along these lines, it would be useful to simulate the scoring system to better understand how a school's performance on particular metrics would lead to overall ratings and categorization. For example, a scoring system based on 100 points as established under the Illinois Balanced Accountability Measures law (Public Act 099 0193) could help educators, leaders, and community members better understand school performance – however the relationship between the cut scores established in the law and the metrics should be better understood.

Academic Indicators

We ask that ISBE consider capturing proficiency through an approach that provides for the status of all students across the continuum of student performance and/or through a metric that captures students' growth towards proficiency. Previous accountability models only emphasized the number of students scoring proficient on assessments, which unfairly punished some schools for demographic factors outside of their control. Approaches that could be considered for proficiency include use of an index based on scores of students on state assessments or tables that provide credit for students across different performance levels of PARCC. Depending on the final regulations developed by the US Department of Education, the State Board should consider whether credit for proficiency levels can be based on student's prior year proficiency. While this approach has generally been considered a growth measure, depending on the final rules and regulations it may also be possible to adopt this measure for proficiency purposes.

Student Achievement-Growth Indicators

A growth metric or multiple growth metrics should represent a plurality of the weight in the system and growth should be weighted more heavily than proficiency, because it's a better, fairer, indicator of student progress given that students begin at different starting points. Districts cannot control the initial achievement of each student, however, they are responsible for the growth of students under their instruction. Such growth should be acknowledged whether it is above or below the grade standard for academic achievement. Different growth measures provide different types of information. For example, measures such as value-added or student growth percentiles provide a measure of growth based on expectations determined by the growth of other students with similar initial scores and/or demographics. Other growth measures such as value tables provide a picture of students' growth towards a set standard. Each of these measures provides useful information to districts, schools, communities and the state and we would encourage the state to consider using and reporting on growth measures that serve each of these purposes.

English Learner Progress

We encourage ISBE to adopt expectations for English Learners' growth based on factors shown to impact students' academic performance (socio-economic status, ability status, etc.). In addition, we suggest that ISBE mandate EL assessment in the student's primary language. With the inclusion of an

ELP measure, this will allow the accountability system to both measure academic content proficiency and English language proficiency. If native language assessment is not possible, the approach to weighting the EL subgroup will need to be assessed since inclusion of an EL subgroup would double count possibly invalid assessment results in the overall system of accountability.

Advance Illinois recommends that the state be careful about the amount that the ELP is weighted. This measure is new and it is not clear what the best approach to its measurement should be. Given this, we would suggest that the ELP measure does not account for more than 10% of the overall weight of the accountability system.

Subgroups

ESSA mandates reporting of achievement for all students and by subgroup. In order to highlight the performance of subgroups, the state should adopt at least one of the following approaches to emphasizing the performance of these groups:

- Overweight the performance of subgroups in the overall rating of school performance. For example, the weight of subgroups could be up to 50% of the weight for any metric in the system. This would ensure that subgroup metrics such as growth on state assessments or on school quality metrics would have a significant impact even if the subgroup population is smaller than 50%.
- Provide a separate rating for subgroup performance. For example, if the overall rating for school performance is very good, but certain subgroups (e.g. low-income students) are not performing as well, this would be reported clearly to the public and school community.
- Develop a rule that avoided providing the highest ratings or identified schools as schools from which best practice was captured, if they were underperforming with subgroups.

The state should minimize the N-size for sub-groups. Using an N-size of no more than 20 will ensure that subgroups are identified even in schools that have smaller populations of students with disabilities, low-income, English Learner, Latino, and African American students.

School Quality

Advance Illinois is supportive of the list of school quality metrics that the Accountability Workgroup identified, as captured on page 16 and 17 of the draft. We would like to the state consider career pathways and the seal of bi-literacy be part of any advanced coursework measure (the draft captures IB, AP, and Dual Credit). In addition, we think the State Board should continue to consider a student survey component of the school quality metric. This could include using the student survey components of the 5E or choosing another student survey. Finally, the state should include school quality metrics (e.g. chronic absenteeism) that place specific weight on grades before 3rd grade .

Aggregating Measures and Summative Rating

The state should include summative ratings in order to provide clear information about school performance. Any categorization system should ensure that low-performance for particular subgroups can be highlighted. To provide a true understanding of school quality (and not simply highlight the demographics of the school) summative ratings need to be based on metrics that are not overly-correlated with school demographics, for example growth and not proficiency. In addition, the

assessments informing the metrics need to be as valid as possible. As noted above, the state should provide simulations of the model to allow review of the types of schools that will be categorized in different models.

Timeline and Goals

Long-term goals for the accountability system should be realistic and vetted by experts in the field. The goals for the state should be aligned to P20 goals for ensuring postsecondary success, with a time horizon for students that are entering the Pre-K-12 system now and in the future – providing a true Pre-K-20 perspective. Providing goals at 5-year intervals up to 20 years would provide both shorter-term and longer-term time horizons.

3.2 and 3.3 State Support and Improvement for Low-Performing Schools

Advance Illinois plans to continue to review and consider the state’s plan for identification of low-performing schools and the supports that they will receive. As discussed in the state plan, measures for accountability are only one part of the system of support and intervention. Additional data should be collected to make determinations of the interventions and supports. The state should provide as much clarity as possible of the implications of data on particular interventions and supports. While this may not be required by the plan, transparency about the impact of data on the determination of interventions is critical for transparency.

In addition, we believe that a school or district’s categorization in the accountability system should be based mostly on the progress of its students. An accountability system needs to intentionally consider a school’s context and resources before assigning interventions. Once the level of progress of students is well-understood, the state can gather more information to make determinations about interventions. This can include information about the student population (does the school have kids in foster care or students that are homeless?), information about processes at the school or district and, importantly, the current level of resourcing for the school.

Finally, before the state intervenes in a school that is not meeting goals for academic progress for subgroups, (e.g. low-income students are not learning at the same rates as non-low-income students) the state should assess whether or not the district is spending the additional money it receives for student-based factors such as low-income or EL status, on the students that fall into these categories (e.g. are low-income students getting additional supports that are not received by non-low-income students?).

Section 4: Supporting Excellent Educators

4.1 Systems of Educator Development, Retention, and Advancement

The state can use up to 5% of its Title II funds for state support activities. We would like the state to consider use of these funds for a number of different purposes including incenting teacher leadership programs, convening district leaders to build support for teacher leadership, the development of systems to help support and monitor teacher evaluation in the state, supports for increasing teacher diversity, and improving the pipeline for teacher recruitment in low-performing schools through the use of multiple strategies such as data use and teacher residencies.

We would also like ISBE to consider the adequate preparation of new educators for low income and minority students by encouraging and incentivizing teacher residency program partnerships between districts and teacher preparation programs that require prospective teachers to complete a school-based program for not less than one academic year, teaching alongside an effective teacher, receiving concurrent instruction, and teaching in the content area in which the teacher will become certified.

Finally, in order to better understand our subject-area and regional educator supply and demand issues, we urge ISBE to publish its Supply and Demand report more frequently and include regional shortage information as well as projected demand.

4.2 Support for Educators

We would like district- and state-level plans for Title II to be made more accessible to the public. As discussed in 4.A.ii, we encourage ISBE to continue to provide training for teacher and principal evaluators. We also encourage ISBE to support a principal support program for schools in districts identified for comprehensive services. We are also supportive of the comment from the Listening Tour participant for utilizing Title II for school leadership training as well as the support for induction and mentoring.

4.3 Educator Equity

Regarding 4.3.A, we are supportive of the definition of ‘ineffective teacher’ as one who has received an “unsatisfactory” rating in his/her most recent performance evaluation rating or a teacher who has received a “needs improvement” on an evaluation and in a subsequent evaluation has received an “unsatisfactory” or “needs improvement.”

We are supportive of Illinois Equity Plan recommendations that ISBE “develop with teacher prep institutions, best practices for preparing individuals who wish to teach in high poverty or high minority districts...with prolonged field experiences in these districts”. These recommendations could be moved forward with an incentive for district / educator preparation programs to partner and could require a funding match by both parties.

Thank you for the opportunity to provide comments on the first draft of the ESSA Plan. We would be happy to discuss any of our comments further if you would like.

We look forward to working with you to further refine the plan to ensure that all students, and especially our neediest students, graduate ready for college and careers.

Sincerely,

Ginger Ostro
Executive Director
Advance Illinois

Section 1: Consultation and Coordination

As the recognized global leader in continuous improvement, serving 34,000 institutions impacting more than four million educators and 20 million students in 70 countries, AdvancED is appreciative of the opportunity to provide comment on Illinois' first draft plan.

Illinois would benefit by taking a systems approach to implementing its continuous improvement framework. As state leadership is aware, coordinating resources and programs helps eliminate barriers and silos to achieve the state's vision for student success. It empowers the education community to design improvement plans that best serve their students' needs within the constraints of unique educational settings in which they operate. Intentionally designing flexibility and recognizing Illinois is a richly diverse state with a long history of local control is fundamental to instituting an effective continuous improvement system. AdvancED is assisting multiple State Education Agencies and stands ready to be of service to Illinois, as well to offer its depth of experience and broad expertise cultivated through research and historical perspective in the continuous improvement arena.

Section 2: Challenging State Academic Standards and Academic Assessments

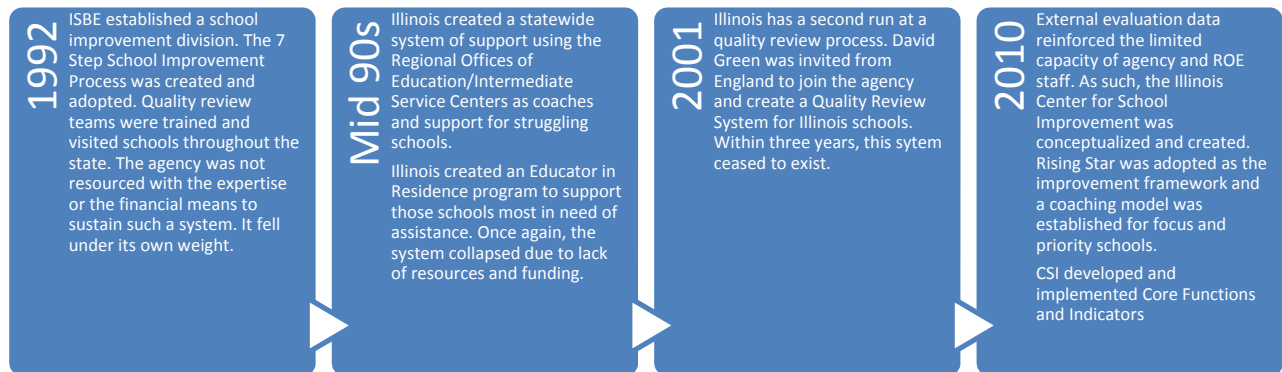
By the very nature of AdvancED's policies, it embeds continuous improvement into its own processes to ensure current research is used to identify those elements most effective in improving schooling. Using multiple data points as its guide to identify priority districts, it is AdvancED's recommendation the state should adopt research-based improvement strategies to be implemented in those districts which require comprehensive services. As part of its continuous improvement framework, Illinois should give serious consideration to execute the intervention used by the state's takeover districts which required their leadership to work with a national organization to pursue and achieve district-wide accreditation. Working with AdvancED, a customized approach was designed which has yielded reliable, evidence-based data to inform district-wide improvement plans and differentiated to the needs of the schools it serves. Using this approach has helped facilitate preparations for hosting a national peer review team in 2016 – 17 to examine the district's culture and climate data, student achievement data, and degree of implementation of research-based standards to provide an evidence-based Index of Education Quality™ (IEQ™) and recommendation for accreditation. After nearly four years of using AdvancED accreditation and continuous improvement processes, it is anticipated this district will be removed from the takeover list. Plans are underway for a second district to host a national team in the 2017 – 18 school year with the same expectations for positive outcomes.

Pre Accreditation Reviews and systems accreditation are just two of the many proven, results-oriented, research-aligned improvement strategies AdvancED can offer. Leadership Audits, Diagnostic Reviews, culture and climate surveys, student engagement assessment using *eleot*® (Effective Learning Environments Observation Tool®) and student- based surveys, Impact of Instruction assessments, and a host of other continuous improvement services are readily available to help Illinois design a customized approach for its continuous improvement system and facilitate meaningful outcomes on behalf of the students it serves.

Section 3: Accountability, Support and Improvement for Schools

Shifting paradigms from accountability to continuous improvement system is not a familiar path for many educators, however this concept is not new to Illinois. It has invested millions of dollars for a statewide system of support over the past 20 plus years and has yielded limited improvement as a result of its efforts despite well-developed plans nuanced to include student growth and other school effectiveness factors. A timeline is provided below which delineates the state’s focused efforts to build its own improvement models.

Illinois Improvement Historical Perspective



Building upon the past, with an eye toward the future, key learning points can be harvested from these efforts and school improvement in general to inform future decision making.

School Improvement Insights

1. Leverage existing proven processes rather than recreate or reconstitute new ones.
2. Focus on what’s most important – student success for each and every learner. When everything is important, nothing is important.
3. Some institutions will not have the capacity to improve on their own and will need specialized coaching and support.
4. All stakeholders must work collaboratively and coordinating efforts is vital. Delivering consistent communication is crucial.
5. As research indicates, change for most challenged schools will take time. Stay the course, appreciate their journey, and assume positive intent.
6. A single assessment cannot paint the picture of the whole child.
7. Clearly articulate the vision, goals, and metrics for accountability. If only a psychometrician can explain it, then it is too complicated.

8. Do not denigrate the efforts of the past. Build on what works and re-direct where necessary. There is no magic bullet or quick fix.

As noted above, Illinois has created multiple state specific frameworks. ESSA provides an opportunity for Illinois to adopt an international framework of excellence proven to deliver consistent, meaningful results. This move would follow other State Education Agencies' lead including Kentucky, Michigan, North Dakota, South Carolina, and Wyoming that use AdvancED improvement processes customized to state-specific needs. AdvancED continuous improvement process is a framework used in institutions around the world, and here in Illinois, has been the chosen intervention to facilitate improvement in the state's most historically broken school systems – and it's working as a catalyst to bring about meaningful change in them. While change has happened incrementally over time within these districts (3 to 5 years), positive outcomes are occurring as evidenced by student achievement on the rise, lower rates of teacher and administrator turnover, and increasing levels of stakeholder satisfaction – all positive indicators of effective schooling.

AdvancED also partners with school districts in Illinois that choose to use its process as an alternative to the state's improvement processes simply because district leadership finds it effective in facilitating positive change and helps focus their work on those elements which will yield the highest desired result to positively impact student achievement. Districts from collar counties to those in those in rural southern geographies use AdvancED as it is effective regardless of educational context or school setting. The underlying philosophy of AdvancED's continuous improvement model is education systems should be designed as learner-centric and include high expectations for all students served by them. A foundational belief which should be embedded in a continuous improvement system is that all learners, with the right instructional support and guidance, can achieve optimal outcomes in academics, emotional development, and social wellbeing. This fundamental belief and focus on the whole child is non-negotiable in AdvancED's continuous improvement framework.

Section 4: Supporting Excellent Educators

The AdvancED Continuous Improvement journey includes a core set of quality factors that influence effective schooling and facilitate desired outcomes for educators and their ability to achieve shared visions for student success. The approach to improvement is not a one-size-fits-all solution, rather it is a set of factors all of which have the potential to transform an education community, not by using outcomes as goals, but instead focusing on changing processes, practices, and actions and thus drive improvement. AdvancED's deep experiential base combined with a 21st Century perspective on the Effective Schools research led to the identification of seven school quality factors key to drive improvement. The factors build on and amplify what has been learned about how to change a school's culture, conditions, processes, practices, and actions and are also an effective way for schools and systems to organize and focus their improvement efforts. They are:

- **Clear Direction.** The capacity to agree upon, define and clearly communicate to stakeholders the direction, mission and goals that the institution is committed to achieving

- **Healthy Culture.** The shared values, beliefs, written and unwritten rules, assumptions, and behavior of stakeholders within the school community that shape the school's social norms and create opportunities for everyone to be successful
- **High Expectations.** An institution's stated commitment and demonstrated actions in support of high expectations for all stakeholders, including excellent student learning outcomes and success, high levels of teacher quality and support, leadership effectiveness, proactive community engagement, and valuable parent involvement
- **Impact of Instruction.** The capacity of every teacher to purposefully and intentionally create an environment that empowers all students to be successful in their learning and reach expected levels of achievement, including readiness to transition to the next level of learning or career pathway
- **Resource Management.** The ability of a school to plan, secure and allocate its resources (human, material, and fiscal) to meet the needs of every learner
- **Efficacy of Engagement.** The capacity to engage learners and other stakeholders in an effective manner to improve learning outcomes
- **Implementation Capacity.** The ability of a school to execute, with consistency, actions designed to improve organizational and instructional effectiveness

These factors provide touchpoints and serve as guideposts to help educators produce the positive outcomes and successes Illinois students deserve. Tools and resources such as culture and climate surveys, teacher and student inventories, instructional impact assessment, self assessments, student engagement assessment, and others can be used to measure their degree and depth of implementation within schools and provide data to drive meaningful improvement throughout the education system.

Section 5: Supporting all Students

The need for adopting AdvancED's framework as the statewide continuous improvement system is compelling and the benefits of effecting improvement are obvious. It is widely acknowledged there are far-reaching benefits to accurately identify, consistently apply, and effectively implement the drivers of institutional improvement. These drivers may not only improve the performance of schools, school systems, and students, but are also valuable to the broader community in terms of economic impacts and quality of human capital resources throughout Illinois. However, it is recognized the challenges are complex and diverse. It is clear that effective application of a comprehensive, research-based, and results driven continuous improvement model leverages student success as evidenced by AdvancED data collected from over 34,000 institutions in 70 countries.



Heart Disease and Stroke. You're the Cure.

October 7, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #1

Dear Dr. Smith,

Thank you for the opportunity to respond to the first draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

The American Heart Association (AHA) is a national nonprofit organization that is dedicated to building healthier lives, free of cardiovascular diseases and stroke. The AHA advocates on policy which aims to help all children achieve a healthy weight, and ensure that the places where our children live, learn, and play make the healthy choice the easy choice. To that end, we're advocating for physical education to be included in every state's ESSA plans. PE addresses the needs of the whole child, positively impacting their physical, mental and emotional health, making it a critical part of every child's education.

Several of the AHA's long-term goals align with ESSA's recognition of the need for schools to support the whole child, specifically the importance of promoting physical and mental health and wellness, including:

- Implementing nutrition standards for school meals and competitive foods in all Illinois schools and after-school programs.
- Supporting initiatives to integrate physical activity into the school day, including daily high-quality enhanced physical education, daily recess, classroom education that includes physical activity, and extracurricular physical activity programs.

The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning. In our comments, the AHA provides recommendations to the Illinois State Board of Education (ISBE) on improving the state plan, responses to the questions raised in the proposed Illinois state plan, and supplemental background information to justify our recommendations. Additional information is available upon request.

ISBE has already recognized the connection between student health and education and has made important strides in supporting physical health and wellness. We urge you seize the new opportunity presented by the implementation of ESSA to further support student health and school wellness.

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,

Julie Mirostaw
Director, Illinois Government Relations

Executive Summary: The AHA Recommendations

The AHA recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, the AHA recommends:

- Include **physical education** as a measure of school quality in Illinois' state accountability system, and include this indicator on school report cards. The AHA recommends that ISBE standardize the measurement of physical education and require reporting the following measures in school report cards:
 - The number of elementary school students receiving/schools offering the equivalent of 30 minutes of per day or 150 minutes per week of physical education;
 - The number of middle school students receiving/schools offering the equivalent of 45 minutes per day or 225 minutes per week of physical education per week and;
 - The percentage of schools requiring physical education for high school graduation.
- Additional measurements that the ISBE should consider including in school report cards to better evaluate physical education include:
 - The percentage of students granted waivers, substitutions or exemptions from physical education,
 - The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
 - The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
 - The percentage of physical education curriculum that are aligned with state standards, and
 - The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

The AHA recommendations are related to the following sections of Illinois’ proposed plan, as well as sections that are pending public comment, including those related to accountability measures. Organized by content areas, the AHA recommendations will focus on:

	Standards and Assessments	Accountability System	Report Cards	Needs Assessments	School Improvement/Evidence-Based Interventions	Professional Development
Student Fitness/Access to Physical Activity	✓	✓	✓	✓	✓	✓
Ensuring a Well-Rounded Education				✓	✓	✓

Introduction: Illinois Should Integrate Health and Wellness into Education Policy and Practice

The Learning-Health Connection

The link between health and learning is clear: healthy, active, and well-nourished children are more likely to attend school, be ready to learn and stay engaged in class.

Despite widespread agreement on these facts, many school environments do not promote health. Too many students spend their days in buildings with unhealthy air, have limited opportunities for physical activity, and have inadequate access to fresh water, nutritious food or a school nurse. Many students come to school with one or more health problems that impact their ability to learn. According to the U.S. Centers for Disease Control and Prevention (CDC), the incidence of chronic diseases—including asthma, obesity, and diabetes—has doubled among children over the past several decades. This has implications not only for children’s long-term health but also for their opportunities to learn and succeed at school. Just as important, we know that students who achieve success in schools are more likely to achieve better health over their lifetime.¹

This challenge is especially critical in light of the nation’s vast health and educational disparities. Low-income and minority students are at increased risk of health problems that hinder learning. These students are more likely to attend schools with unhealthy environments and that do not invest in evidence-based prevention. Unless we address these disparities in health status and school environments, efforts to close the education achievement gap will fall short.

Illinois Policy Recognizes the Importance of Student Health and Wellness

The State of Illinois recognizes the inextricable link between health and learning. Existing state policies require or encourage schools to address a range of issues including social and emotional

¹ Health in Mind: Improving Education Through Wellness, a report by HSC and Trust for America’s Health, May 2012. Available at https://healthyschoolscampaign.org/wp-content/uploads/2015/07/Health_in_Mind_Report.pdf

learning, school climate, physical education and fitness, chronic absenteeism, and discipline practices. In fact, one of the goals of the current state plan is for every school to offer a safe and healthy learning environment for all students.²

Physical Education: Illinois has been a leader in valuing children’s health, long requiring daily physical education (P.E.) for students in grades K-12. Since 2012, ISBE and the Illinois Department of Public Health have worked to promote “enhanced physical education,” an evidence-based strategy recommended by the CDC’s Community Guide to increase activity levels in or the length of school-based P.E. classes.

This work is based on the Illinois Enhanced P.E. Strategic Plan, a high-level roadmap to increase school-based P.E. and inspire a culture shift that makes high quality P.E. and wellness a priority for all schools and children. The movement is driven by a new understanding that high-quality P.E. is as important as math, science, or any other core subject because it correlates directly to the health and well-being of students for the rest of their lives.

As part of this work, in 2012, Public Act 97-1102 established the Illinois Enhance P.E. Task Force (EPETF), charged with promoting and recommending enhanced P.E. programs that could be integrated with broader wellness strategies and health curriculum in elementary and secondary schools, and revising the State Learning Standards on Physical Development & Health to reflect the rich body of neuroscience on the connection between movement and improved student outcomes, as well as them bringing them into alignment with current best practices.

One of the EPETF’s recommendations was to develop and utilize metrics to assess the impact of enhanced P.E. and measure the effectiveness of State Goal 20 of the Illinois Learning Standards for Physical Development and Health, which is to help students to achieve and maintain a health-enhancing level of physical fitness based upon continual self –assessments. This recommendation led to advocacy for Public Act 98-0859, which was enacted to implement fitness testing in Illinois starting in the 2016-17 school year.

Further demonstrating the state’s commitment to the whole child, in 2011 Illinois recognized the need to incorporate health and wellness measures into the school report card by, as of 2016, requiring all Illinois public schools to report the average number of days of P.E. they provide per week per student.

Physical Activity: While physical activity (PA) is different from P.E. in that P.E. is a planned sequence of developmentally appropriate activities and games that educates students about and through movement, and is taught by qualified teachers who assess student knowledge, and motor and social skills to establish and sustain a healthy lifestyle, a school environment that provides comprehensive opportunities for PA before, during and after the school day is critical to ensuring students get the recommended 60 minutes of PA per day, as recommended in the [Physical Activity Guidelines for Americans](#).

² Illinois State Board of Education: Progress Report of the Comprehensive Strategic Plan for Elementary and Secondary Education. Available at http://www.isbe.net/reports/strategic_plan16.pdf

In 2007, ISBE codified this by establishing a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy.

ESSA: A new opportunity to support student health and wellness

ESSA presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting student physical and mental health and wellness.

Given the importance of student health and the key role that schools can play in promoting student health and wellness, incorporating health and wellness into Illinois' state plan in a comprehensive and integrated fashion will provide educators, policymakers and the public with a more complete understanding of how student health and wellness are impacting learning and academic outcomes and can serve as a decision-making compass, not stigmatizing parents and students or blaming districts/educators, but, rather, helping schools and school districts effectively drive improvement strategies. If accountability systems recognized the full experience of a student—including health conditions that might impede learning—educators could develop a more comprehensive understanding of student performance, and could deploy resources to schools and students at greatest risk. Parents and community members also benefit from knowing more about how their schools are supporting and promoting student health and well-being.

The AHA Responds to Illinois' Proposed State Plan: *Expanding the Opportunity for Illinois to Support Optimal Student Achievement, Development, and Health*

The AHA recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, the AHA recommends:

- Include **physical education** as a measure of school quality in Illinois' state accountability system, and include this indicator on school report cards. The AHA recommends that ISBE standardize the measurement of physical education and require reporting the following measures in school report cards:
 - The number of elementary school students receiving/schools offering 150 minutes of physical education per week,
 - The number of middle school students receiving/schools offering 225 minutes of physical education per week, and
 - The percentage of schools requiring physical education for high school graduation.

- **To better evaluate physical education quality in schools**, ISBE should consider including the following measurements on report cards:
 - The percentage of students granted waivers, substitutions or exemptions from physical education,
 - The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
 - The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
 - The percentage of physical education curriculum that are aligned with state standards, and
 - The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

These recommendations are described below, aligned by the sections of the Illinois proposed plan.

Challenging Academic Standards and Academic Assessments (Proposed Illinois State Plan, p. 6): Expanding to Include Assessments of Health-Related Standards

ESSA requires schools to offer students a “well-rounded education.” The definition of well-rounded education includes health education, nutrition education, and physical education. In addition, each state plan must provide an assurance that the state has adopted challenging academic content and high quality student academic assessments in a number of subjects like math, reading or language arts and science and may develop standards and implement assessments in other subjects.

***Illinois’ Accountability Support and Improvement for Schools
Accountability System and Indicators (Proposed Illinois State Plan, pp. 13-22): Include Physical Education Minutes and High School Graduation Requirement as Measures of School Quality and Student Success***

According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being, and physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during, and after school to ensure that their students are ready to learn.

The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use Fitnessgram assessments to measure students’ progress towards the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance, and muscular strength. School districts are required to report aggregate data to ISBE by May of each year.

Illinois’ State Report Card: Maintain Existing Health-Related Measures and Add Additional Measures

The AHA recommendations around school report cards are designed to reinforce and provide parents and others with information that creates a more comprehensive picture of a school's efforts for continual improvement around attendance and student fitness.

Illinois currently includes measures about physical education on the school report card, which the AHA supports maintaining. In addition, the AHA recommends that ISBE include additional measures on report cards which relate to the quality and implementation of physical education in schools:

- The percentage of students granted waivers, substitutions or exemptions from physical education,
- The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program),
- The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards,
- The percentage of physical education curriculum that are aligned with state standards, and
- The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)

State Support and Improvement of Low-Performing Schools (p. 27-30): Ensure Rigorous and Comprehensive Needs Assessments and Evidence-Based Interventions

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools

Comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development, and health. ISBE can provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Fortunately, several publicly available tools also provide guidance on action planning to make improvements in the school environment.

These tools include:

- The CDC's School Health Index, specifically the Physical Education and Other Physical Activity Programs module (Module 3).
- The Let's Move Active Schools baseline assessment (schools will have to first register for Let's Move Active Schools).
- The Alliance for a Healthier Generation Healthy Schools Program assessment.

Both the Let's Move Active Schools and the Alliance for a Healthier Generation's assessments mirror the School Health Index. Schools might already have engaged in one of these assessments within the two previous school years. Conducting these assessments assist schools by helping them create action plans, and connect them to resources, funding opportunities, and potentially for national recognition.

Design Evidence-Based Interventions Based on Findings

The AHA recommends that ISBE promote Enhanced Physical Education (EPE), an evidence-based intervention recommended in the CDC's Guide to Community Prevention Services, which is defined as programs that increase the length of, or activity levels in, school-based physical

education classes. The AHA also recommends that ISBE promote the CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school.

Additionally, the AHA recommends that needs assessments ask schools if they are eligible for the “Community Eligibility Provision” for school lunch programs, and if they are, if they are taking the option. Including this question about the provision will help schools identify potential food and nutrition benefits for their students that they can leverage to promote health.

Table 3: Summary of Recommendations for Accountability Measure, School Report Card Measures, Needs Assessment, Evidence-Based Practices and Professional Development

	Recommendations
Accountability Measures on Physical Education	<ul style="list-style-type: none"> • The number of elementary school students receiving/schools offering 150 minutes of physical education per week, • The number of middle school students receiving/schools offering 225 minutes of physical education per week, and • The percentage of schools requiring physical education for high school graduation.
School Report Card	<ul style="list-style-type: none"> • The percentage of students granted waivers, substitutions or exemptions from physical education, • The percentage of schools or students that participate in standardized, criterion-referenced fitness assessment for student growth and improvement (such as the President's Physical Fitness Test, Fitnessgram, or other comparable program), • The percentage increase of students who demonstrate age-appropriate, gross and fine motor skills, as defined by competencies in state standards, • The percentage of physical education curriculum that are aligned with state standards, and • The percentage of students with disabilities that participate meaningfully in physical education classes (based on criteria outlined in the School Health Index or findings from government Accountability Organization Report on physical education participation for students with disabilities)
Needs Assessment	<p>One of the following:</p> <ul style="list-style-type: none"> • The CDC’s <u>School Health Index</u>, specifically the Physical Education and Other Physical Activity Programs module (Module 3). • The <u>Let’s Move Active Schools</u> baseline assessment • The <u>Alliance for a Healthier Generation Healthy Schools Program</u> assessment.
Evidence-Based Interventions	<ul style="list-style-type: none"> • CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school • Enhanced Physical Education, includes details on specific evidence-based

interventions recommended in the CDC's *Guide to Community Prevention Services*

Conclusion

The AHA is grateful for the opportunity to respond to the first draft of the state's plan for implementation of the Every Student Succeeds Act. The AHA applauds Illinois' long-standing commitment to student achievement, health, and development and for taking action to support students. We urge you to continue to advance your work by recognizing the importance of physical health and other related issues. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.

Every Student Succeeds Act Illinois State Board of Education Draft Plan Feedback
October 3, 2016

Introduction

The Illinois State Board of Education (ISBE) drafted a state plan that addresses components of the Every Student Succeeds Act (ESSA). ISBE included questions and requests for feedback under the following headings. This document addresses those questions and requests for feedback from the perspective of a concerned citizen of Illinois.

Consultation and Coordination

ISBE requests ideas from individuals or groups regarding how funding streams can be combined in order to support each and every child as she or he progresses through school.

ESSA provides an opportunity to provide local educational agencies with flexibility to consolidate eligible Federal funds and State and local education funding in order to create a single school funding system based on weighted per-pupil allocations for low-income and otherwise disadvantaged students.

The consolidation of funds and the concept of a weighted student formula draws attention away from the foundational issue of Illinois' inadequate and inequitable school funding formula. Even if the policy was able to distribute the funds in a more equitable manner, the overall amount of money is not sufficient to provide equitable educational opportunities for all students.

Therefore, I would like to call upon ISBE, the Governor, and the General Assembly to increase the level of financial support for public education by causing the state to meet its primary funding obligation. Schools require adequate resources to ensure all students are successful.

Challenging State Academic Standards and Academic Assessments

ISBE is considering raising the overall composite proficiency level on the ACCESS for EL for students to be considered English language proficient. The current levels are overall 5.0, reading 4.2, and writing 4.2. ISBE requests ideas from individuals or groups regarding the overall composite proficiency level on ACCESS for ELs.

The WIDA ACCESS for ELLs 2.0 Interpretive Guide for Score Reports suggests that a scale score of 5 means that the reading, writing, and speaking of the student is generally comparable to that of English proficient peers. Therefore, I encourage the state to raise the proficiency standards to 5 to ensure EL students are receiving equitable resources to ensure their success.

The local choice option is designed to allow a nationally recognized college entrance exam to substitute for the ISBE-identified accountability assessment. ISBE is currently using the SAT with essay for the purposes of the state accountability in ELA and math. ISBE requests feedback from stakeholders regarding this approach.

I believe that any statewide assessment used for accountability purposes should reflect a comparison of each student's progress from year to year and appropriately measure achievement for EL and special

education students. In addition, teachers should be provided the adequate tools, resources, and professional development needed to prepare students to take such assessments.

That being said, I also believe that PARCC should be reinstated at the high school level with the stipulation that all students within a chosen grade (e.g., 11) take the exam to ensure a valid longitudinal data system. Further, there are no independent research studies that validate the alignment of ACT or SAT to the Illinois Learning Standards (i.e., Common Core State Standards). Therefore, the ACT or SAT cannot be used to accurately gauge students' mastery of the state standards and should not be used as the state assessment in high school. In addition, allowing a district to choose which assessment it wants to use for accountability purposes negates the purpose of a statewide accountability system, and undermines the ability of the state to track student achievement over time.

Accountability, Support, and Improvement for Schools

ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators (e.g., why a particular indicator makes/does not make sense within an accountability system).

I believe that an ideal system must include resource accountability. All schools require access to adequate resources (e.g., staffing, facilities, materials, technology, and professional learning) to ensure student success. Therefore, under our current funding formula, the only logical additional indicator is access to resources. For example, the availability of adequate funding, staffing, and facilities. These measures would hold the state and local education agencies accountable for providing sufficient resources to support student learning and would help identify schools in need of support as well as inequities in resource distribution across schools and districts. These indicators may be measured using data already available such as student-teacher ratios or using survey data from students, teachers, and parents to report aspects of resource availability.

In addition, the Illinois College and Career Ready Indicator Framework may have unintended consequences for students who find they are unable to meet the 90% attendance benchmark to due prolonged illness or family obligations for example. Also, students who have children or must work to supplement their family's income after or before school may not be able to complete 25 hours of community or military service, engage in a workplace learning experience, or participate in two or more organized co-curricular activities. The state should ensure that these indicators support rather than hinder a student's high school graduation.

ISBE requests ideas from individuals or groups regarding the two examples of weighting (e.g., comments on these examples, issues such as the example identified by the Accountability Workgroup, and other, different possibilities of indicators and weighting).

ESSA requires that the state set substantial weights to each indicator included in the statewide accountability system. However, academic indicators must be given more weight than school quality or student success indicators. I propose the following weights:

High School**Academic Indicators – 60%**

- Achievement (20%)
- Graduation Rate (20%)
- EL Proficiency (20%)

Additional Indicators – 40%

- Access to Resources

Elementary/Middle School**Academic Indicators - 60%**

- Achievement (20%)
- Growth (20%)
- EL Proficiency (20%)

Additional Indicators - 40%

- Access to Resources

ISBE requests feedback on the relationship between long-term goals that are ambitious and achievable and long-term goals that are aspirational. ISBE requests feedback on the relationship between interim goals that are ambitious and achievable and interim goals that are relevant.

I believe that the long-term goals the state has currently outlined are aspirational. Long-term goals should be set on a twelve year cycle with interim goals set every three years for individual schools. Goals should be based on a schools growth trajectory compared to schools with similar revenue.

ISBE requests feedback on performance levels. More specifically considerations on (1) Number of levels; (2) Terminology that can be used in expressing the performance levels, and (3) Suggestions that could assist parents and other interested parties in understanding performance levels and what they could mean for a school.

I propose that four performance levels (i.e., low growth low achievement, low growth high achievement, high growth low achievement, and high growth high achievement), visualized in a quadrant, are used to communicate a schools performance. These performance levels demonstrate improvement from one year to the next relative to other schools with similar funding. Each accountability indicator (e.g., achievement, growth, EL proficiency) should be measured using these performance levels compared to a measure of school revenue.

ISBE requests feedback on the timelines for interim and long-term goals. What is the appropriate timeframe for interim and long-term goals, and why?

I believe that long-term goals should be set on a twelve year cycle with interim goals set every three years for individual schools. Goals should be based on a schools growth trajectory compared to schools with similar revenue.

Should Illinois identify the lowest-performing 5 percent of schools first, and then identify high schools with a four-year graduation rate of less than 67 percent? Or should the state identify high schools first, then calculate a lowest-performing 5 percent from the remaining pool? Alternate methods will either increase or decrease the number of schools identified.

I suggests first identifying the lowest-performing 5% of schools, and then identifying high schools with a four-year graduation rate of less than 67%, as many of these schools may be the same.

How many years (up to four inclusive of a possible planning year) should schools with a student group whose performance is on par or lower than the performance of the “all students” group in the lowest-performing 5 percent of schools have to implement a school improvement plan before it is identified as requiring comprehensive supports and services, and why?

In order to ensure that all students are provided with the resources needed to be successful, I suggest allowing two years (i.e., one planning and one implementation) for a school to successfully implement a school improvement plan.

With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not?

Improvements in achievement and growth should be required to ensure all students are receiving adequate resources. Depending on the community, one or the other might provide greater insight into different subgroups of students and their needs.

Should there be minimal required amounts of growth (beyond the requirement to no longer meet the criteria for identification)? If so, what amount of growth would be sufficient? If not, why not?

Targets for growth should be made for individual schools relative to the achievement and growth of schools with similar revenue.

Is growth in the “all students” group sufficient, or must there be growth for underperforming student groups as well? If “all students” is sufficient, why? If growth for underperforming groups is necessary, why so?

ESSA requires the reporting of accountability data for identified subgroups of students, and requires schools to intervene when low-performing subgroups are identified. Therefore, the measurement of growth within identified subgroups of students is required. In addition, goals for measuring student growth must be based on schools with similar revenue.

How should these exit criteria support or hinder progress toward the state long-term goals and measures of interim progress? What, if any, additional exit criteria should Illinois use? If so, what criteria and why?

I suggest that schools identified as underperforming should have this label removed when all students have met attainable goals for achievement and growth.

ISBE requests stakeholder response or additional ideas regarding the ISBE proposal for evidence-based strategies.

I encourage the state to ensure that all proposed strategies and interventions are truly evidence-based (i.e., demonstrates a statistically significant effect on improving student outcomes), and ensure schools have implemented these strategies and interventions with fidelity. However, it is important to note that implementing any strategy requires access to adequate resources.

In addition, the state should encourage schools to implement strategies and interventions that do not require purchasing costly proprietary materials or services. Instead, schools should spend funds allocated to them for this purpose on quality professional development delivered by effective teachers and the development of professional learning communities.

ISBE requests stakeholder comments on the proposed periodic resource allocation review.

I encourage the state to require schools to produce evidence that any federal or state money spent on proprietary materials or services, consulting services, or data analysis services have made a significant impact on student achievement.

In addition, the state should engage in ongoing review of the state plan and make adjustments to improve the plan as needed with stakeholder input.

Supporting Excellent Educators

ISBE requests additional comments on the aforementioned suggestions or other uses of Title II funds.

Under Title II, ESSA requires that schools consult with teachers and educational support professionals when applying for sub-grants related to professional development. It is important that the state ensure these grant applications are collaboratively developed with educators, and prioritize the funding of evidence-based professional development delivered by effective teachers rather than consultants or companies.

In addition, the literature supports the supposition that ongoing professional development on a specific topic is key to significantly improving student achievement. The greatest improvements in student achievement have been found to be associated with professional development approaches that meet the following criteria:

- Focus on deepening teachers' content knowledge and instructional practices;
- Function as a coherent part of a school's improvement efforts, aligned with curriculum, assessments, and standards, so that teachers can implement the knowledge and practices they learn in their classrooms;
- Occur in collaborative and collegial learning environments in which teachers participate in professional learning and together grapple with issues related to new content and instructional practices;
- Provide authentic activities rooted in teachers' inquiry and reflection about practice within the context of the curriculum and students they teach;
- Link to analysis of teaching and student learning, including the formative use of assessment data; and
- Are supported by coaching, modeling, observations, and feedback.

The equity plan does not include a definition of “Ineffective teacher.” ISBE proposes the following, but requests the assistance of stakeholders in developing a definition. A teacher who has received an “unsatisfactory” rating in his/her most recent performance evaluation rating or a teacher who has received a “needs improvement” on an evaluation and in a subsequent evaluation has received an “unsatisfactory” or “needs improvement.”

I suggest defining “ineffective teacher” as a teacher who has received two subsequent “unsatisfactory” ratings.

The current definition in the equity plan states that an inexperienced teacher is an individual with ‘less than one year’ of experience. ISBE requests stakeholder input in developing a definition for this term.

I suggest defining “inexperienced teacher” as an individual with four years or less of teaching experience.

Additional Comments

ESSA also allows the state to improve upon its process of teacher evaluation. I encourage the state to streamline the administrative code to solely require a simplified version of the state default plan. Such a plan would remove the definitions of different assessment types (e.g., Type I, Type II, Type III). This would allow teachers to choose appropriate assessments that best reflect typical student growth, and ensure teachers are receiving meaningful feedback and support from evaluators. In addition, assessment and data literacy should become a priority for the state.

Finally, the literature concerning growth models has determined that one growth model is not necessarily superior to another. However, I believe that it is important to take into consideration the model's ability to control for and explain error if using a statistical model. Therefore, I have concluded that a hierarchical linear model would be the most viable option from this perspective. Level one of the model would be average student growth across time (at least three years is preferable) and level two would account for variation between schools. Again, I believe it is important to control for revenue in such a model, and ensure that teacher is never included as a variable.

I suggest that the state reconvene the assessment division technical advisory committee of psychometricians and statisticians to ensure such a model is viable and developed with fidelity. If this is not an option due to funding restrictions, I would strongly suggest contacting Dr. Ronald K. Hambleton at the University of Massachusetts Amherst and Dr. Anthony S. Bryk at the Carnegie Foundation. These two men will be able to provide a definitive decision concerning the most appropriate growth model for the state as they are the experts on psychometrics and hierarchical linear modeling respectively. I implore the state to reach out to these experts as unfortunately such expertise cannot and will not be found in any group of stakeholders the state could convene.

October 7, 2016

Dear Illinois State Board of Education,

Arts Alliance Illinois appreciated the opportunity to speak at your Every Student Succeeds Act (ESSA) forum in Chicago on September 27, 2016. You invited speakers to submit their full comments in writing. Below is our feedback on the first draft of Illinois' ESSA State Plan.

The Every Student Succeeds Act explicitly includes the arts in its definition of a "well-rounded education," and with good reason: The arts are essential to a complete and competitive education for all students. Through the arts, students learn to think critically, solve problems creatively, and work collaboratively.

Arts education prepares students for college and career. A study by The Conference Board and the American Association of School Administrators found that over 70 percent of companies rate creativity as a primary concern when hiring, yet 85 percent of these companies cannot find the creative workers they seek.

Arts education also helps close the achievement gap. According to research by James Catterall and the National Endowment for the Arts, low-income students with arts-rich experiences in high school are more than three times as likely to earn a B.A. Those students with few or no arts credits, however, are five times more likely not to graduate.

Given this, we urge you to ***include student access to arts education as an indicator in the State Plan's formula for accountability.***

We also urge you to take the following, additional steps:

- Encourage schools to incorporate arts education into their Title I schoolwide plans, especially since the arts are part of a well-rounded education
- Encourage districts to include the arts in Title IV-A needs assessment and to consider arts education funding through Student Support and Academic Enrichment Grants
- Emphasize the role of arts education in meeting school goals for parent engagement, an important component of ESSA
- Make arts education programs eligible for STEM funding in the education budget, recognizing that ESSA's updated definition of STEM includes the arts

Other states are taking these important steps. For example, Connecticut, New Jersey, and Kentucky are incorporating student access to arts education as a key measure in their accountability formulas.

Thanks to your leadership, Illinois recently updated its arts learning standards, a move that defines quality arts education and positions our state for the next step: giving the arts their full standing in ESSA implementation so that all Illinois students receive quality, well-rounded education.

Thank you for the opportunity to speak at the forum and submit written comments. We appreciate your consideration, and please do not hesitate to contact us if we can provide additional information.

On behalf of the Alliance,

A handwritten signature in black ink, appearing to read "Claire", is centered on the page. The signature is fluid and cursive.

Claire Rice
Executive Director
Arts Alliance Illinois

About Arts Alliance Illinois

With nearly 30,000 advocates and hundreds of member organizations across Illinois, the Alliance is the largest statewide arts advocacy network in the country and the only organization in Illinois that represents artists and cultural organizations across all disciplines, budget sizes, and geographic areas. The Alliance ensures that the arts and arts education are central and indispensable to Illinois by empowering arts and culture stakeholders with the knowledge, skills, and values needed to be active participants in the policymaking process and the civic life of their communities; by providing data-driven evidence on the impact, assets, and needs of the arts and creative industries in Illinois; and by connecting and supporting leaders across multiple sectors around common goals and shared outcomes. Visit ArtsAlliance.org and IllinoisArtsLearning.org



BILINGUAL SPECIAL EDUCATION SUB COMMITTEE OF THE ADVISORY COUNCIL ON BILINGUAL EDUCATION & THE ADVISORY COUNCIL ON THE EDUCATION OF STUDENTS WITH DISABILITIES

The Illinois State Board of Education (ISBE) Joint Subcommittee of the Advisory Council on Bilingual Education and the Advisory Council on the Education of Students with Disabilities is committed to providing information, advocacy, and guidance to ensure a high-quality education for all English learners with disabilities. We appreciate the opportunity to respond to the request for information regarding the implementation of programs under Title 1 of the Elementary and Secondary Education Act, or the Every Student Succeeds Act.

The ISBE Joint Subcommittee on Bilingual Special Education strongly supports the goal to provide every child with “significant opportunity to receive a fair, equitable, and high-quality education that will close the achievement gap.” We strive to fulfill our obligation to protect and promote vulnerable populations that have historically been marginalized, particularly English Learners with disabilities. The sections that follow highlight key aspects of the ESSA in which we would like to see both emphasis and clarification.

Assessments. It has been widely documented that assessments must match the language of instruction in bilingual education programs. The lack of emphasis on this requirement is concerning given that to adequately assess academic achievement, students must be assessed using an approach that recognizes rather penalizes a student with a disability for being in the process of acquiring proficiency in English. Emphasis is needed to reinforce that assessments are measuring what a student can do as a result of receiving high quality academic instruction that is linguistically accessible and that supports development of English language proficiency. In addition, emphasis on the universal design for learning in the assessment process is strongly encouraged.

Dual Services. English Learners with disabilities are entitled to both Bilingual and Special Education programs which provide them with the language instruction and assistance necessary to succeed academically. For decades, this dual entitlement has

been ignored by many well intentioned individuals that are charged with providing students with specialized support they include in a child's individualized education program. Recent guidance by OCR and DOJ has restated this mandate in the Dear Colleague letter of Jan 2015. Including this important expectation/ provision will equip all English Learners with disabilities the opportunity to continue developing their English language under the language assistance programs offered under Bilingual Education.

Educator Equity. Part of ensuring success for all students is equitable access to high-quality instruction provided by effective and appropriately qualified teachers. English learners with disabilities thrive when educators have received adequate training to understand how to program for and support individualized needs when bilingualism or second language acquisition intersects with the presence of a disability. Regulations and guidance that reinforces the importance of ensuring that English learners with disabilities are taught by effective, experienced, and appropriately credentialed educators is essential. At present, many individualized education programs for English learners with disabilities do not reflect thoughtful integration of language learning and language acquisition needs. Supporting needs related to a disability without supporting the student's native language and English language development only serves to further widen the achievement gap. Appropriate credentials to ensure educator equity for English learners with disabilities means that educators would hold both special education licensure and bilingual and/or English as a Second language licensure.

Family Engagement. In providing high-quality instruction to English learners with disabilities, the input of parents, families, and communities is paramount. Requirements to ensure parent/family/community engagement are essential to ensuring the success of all students, particularly English learners with disabilities. Furthermore, an example is needed to illustrate how to facilitate meaningful communication that effectively includes the voices of key stakeholders, particularly when those voices are speaking languages other than English and when they reflect membership to non-dominant cultural groups. This can reflect how it is advantageous that bilingual parents be given adequate communication via their home language and that bilingual special education parents be encouraged to be members of the districts' Bilingual Parent Advisory Councils (BPAC). Further, we support an emphasis to include thoughtful training and intentional credentialing of individuals who attend individualized education programming meetings in the role of an interpreter

Co-chairs:

Sara Jozwik – sjozwik@gmail.com

Juanita A. Rodriguez – jrodriguez3@cps.edu

Mr. Booth,

I have attached a chart that *might* help organize the goal benchmarks in a manner that makes more sense to students, parents and faculty that will be reviewing these 'goals' with students.

Red are ideas that I have added or edited. *Italics* are areas that need further definition from state leaders.

Other thoughts:

The AND wording on the original document must disappear. The benchmarks need to read as DOABLE to every student, and must be EXPLAINABLE for the faculty and staff discussing them.

Ideally, a freshman can look over the college and career readiness marks and grasp how he or she can check the required number of boxes to get where we or the state are asking him or her to progress to by graduation.

These benchmarks do not seem super inclusive. Struggling and resistance learners can easily be turned off by the original list or they may simply disengage from their personal goals if the list seems beyond their skill set. The current list reads like a list for a specific demographic, and we graduate more than one demographic throughout the state.

It is tough to use GPA as a measure. Colleges don't even admit based on a specific GPA, and one tough semester of mono, another serious life event or a continuous high school career with ongoing poverty or 'life issues' can really send a GPA into a tailspin.

Of the last three years of CCHS senior classes, the following would not have met the 2.8 threshold.

Class of 2015 - 70/207 graduated with a 2.79 or below

Class of 2016 - 68/212 graduated with a 2.79 or below

Class of 2017 - 74/217 started senior year with a 2.79 or below.

However, many of the names that graduated with a 2.8 or below are attending (and even thriving) in college and career pathways. We all know students with a 2.5 (or below?!) who work as hard at succeeding here (and maybe show more perseverance) than some students with a 4.0 or above.

An observation; the additional benchmarks make a C in certain classes okay - the GPA, if ISBE insists on using one could even be 2.0, which is a C average. I think we had a graduation speaker a few years ago mention his C's in high school. Yet, he was speaking from the podium and discussing his successful law practice.

I also cannot encourage students to work the system for an easy A that helps the GPA rise, when they could learn more content and like skills by being pushed a bit to earn a B or C in a higher level course.

Attendance is also a tricky topic to feel like a school can manage. We can encourage, we can praise, we can offer rewards or refer to truancy, but every kind of student misses school for so many reasons.

More data from our graduating classes:

Class of 2015 - 175/207 met the 90%

Class of 2016 - 172/212 met the 90%

Class of 2017 - So far 178/217 are meeting the 90%

The list of students making this % is not the same list of students earning a 2.8 or above!

Lastly, the importance of documenting and including part time employment is a must. Colleges note work ethic and commitment to work in reviews of applications, and students learn so much from part time positions. A part time job can take up more time than a school day for some students, and adding this specific benchmark to the list is a positive and meaningful way to let students who work or who have to work know that their job is noted and has meaning in their progress to graduation and their eventual career.

Thanks for sharing this info, Mr. Booth. I hope that ISBE will take feedback from faculty and administrators to create a list of benchmarks that allow every student to feel that he or she can learn and grow in measurable ways throughout high school that allow him or her to move on to college or career feeling confident and prepared. Every student may not graduate meeting the recommended benchmarks, but every student does deserve an opportunity to review and discuss the goal benchmarks with the knowledge that they have a chance to meet them over their high school career with a plan in place detailing the 'how-to's'.

This document provides a good start, and it is exciting to consider each high school incorporating the final list of benchmarks into high school success plans for all students.

Erinn Murphy

Carbondale counseling department chair

Check all that apply: *5(how many checks should it take?)* or more checks reflect College and Career Readiness -

✓	College and Career Readiness Benchmarks	Notes
	GPA = 2.6 or higher	This GPA is a C+ average. It allows for students to make up for a tough start to high school OR a difficult semester or year due to illness, family issues or personal situations. GPA measure could be 2.0 and still reflect readiness.
	SAT score = _____ (College Entrance Score)	<i>Need the goal score</i>
	SAT(9) score = _____ (Desired readiness score)	<i>Need the goal score- I added the 9th and 10th grade assessment so that underclassmen are able to evaluate their progress and areas to work on in order to graduate with their appropriate readiness areas checked. This conversation of college and career ready begins in 9th grade (or before!)</i>
	SAT(10) score = _____ (Desired readiness score)	<i>Need the goal score</i>
	Industry Credential	<i>Definition?</i>
	Advanced Placement Course (A, B or C)	
	Advanced Placement Exam (3+)	
	Dual Credit Career Pathway Course	<i>List them for specific school</i>
	Dual Credit College English (A, B or C)	
	Dual Credit College Math (A, B or C)	
	Algebra II (A, B or C)	
	College Developmental/Remedial English and/or Math (A, B or C)	
	International Baccalaureate Exam (4+)	
	C's or above in all English classes	This benchmark is inclusive. If a student struggles with reading and writing, earning a C in the appropriate English class is possible.
	Part time employment of 10 hours or more each week for a consistent period of high school	
	90% attendance	

	25 hours of Community or Military Service	<i>Who monitors this? Easy to cheat the monitoring system and also discriminatory to students with no/limited transportation or outside assistance in seeking and attending service activities.</i>
	Workplace Learning Experience	<i>Definition?</i>
	Two or more organized Co-Curricular Activities (including language and fine arts)	<i>Who monitors this? Does this mean participation in a class or in a club? Does it mean participation in the activities? If so, at what level? How is participation measured?</i>

Total checks _____



ESSA Listening Tour 2
Center for the Study of Education Policy
10/5/2016

The **Center for the Study of Education Policy (CSEP)** brings the results of research into the everyday world of educators, governmental leaders, and policymakers. Established in 1960, CSEP conducts applied research and performs public service related to current and emerging policy issues affecting early childhood, K-12, and higher education. Important to the mission of CSEP is the intersection of research and practice as represented by publications and service to education institutions, professional organizations, districts, and government. In 2012, CSEP merged with the National Board Resource Center, enhancing the Center's focus on teaching and learning. In an effort to support the ISBE Every Student Succeeds Act (ESSA) stakeholder engagement efforts, CSEP staff have compiled feedback and suggestions regarding targeted questions in ISBE Draft #1 ESSA plan.

QUESTION AND RESPONSES

Section 3: Accountability, Support, and Improvement for Schools¹

ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators.²

Staff members in CSEP approach education policy from the mindset of P-20 systems alignment. One focus of our research and technical assistance to Illinois state policymakers and LEAs is in fostering a seamless and cohesive cross-sector systems alignment with our education and service providers and programs that serve and educate children from Birth through Grade 3 (B-3). With that being said, we are concerned that the accountability system as outlined in ESSA has once again included an assessment system that starts with 3rd grade test scores. We are concerned that while ESSA allows for funding and attention to be paid toward preschool and early elementary programming, with a concentration beginning on 3rd grade test scores, there is a strong possibility that funding and a focus on improving program quality will remain at 3rd grade and above. Therefore, CSEP recognizes the importance of including a PreK-2 indicator on which the KIDS assessment can serve as a foundation. We support its inclusion as a future measurement and reporting on the school report card. The usefulness of the indicator has been overlooked by some as the indicator has the ability to engage community groups and align PreK-3rd grade efforts. Further, when utilized in continuous improvement efforts both district and community preschools can better be held accountable for the many state and federal resources that are devoted to this area.

¹ Page 25 in *A Reader's Guide for the ISBE ESSA State Plan Draft #1*

² Page 14 in *A Reader's Guide for the ISBE ESSA State Plan Draft #1*

While the Kindergarten Individual Development Survey (KIDS) is a valuable, formative assessment required for all kindergarten classrooms in Illinois, CSEP staff members have concerns on the lack of alignment of the KIDS survey to assessments in other grades, especially first and second grade assessments. As such, CSEP recommend that either ISBE consider ways in which KIDS might be expanded to include assessment for first and second grade, or that ISBE explore ways to revise the scope of work for the kindergarten assessment when it is re-bid next year to solicit and select an assessment that spans K-grade 2. Currently, North Carolina received a grant from the U.S. Department of Education (USDOE) to work with 10 states to develop an aligned formative assessment that spans K-3. The purpose of the K-3 formative assessment is to provide families, students, and teachers with the data they need to be able to improve the quality of instruction based on the learning and development needs of students in their classrooms. Like the IL KIDS assessment, the formative assessment under development in these states assesses students on multiple domains of learning and development commonly associated with developing the whole child. Because this project is funded by the USDOE, the assessment developed will be available to any other states that are interested in adopting this assessment system. An additional purpose and benefit of a K-3 formative assessment is that like KIDS, the data serves as a bridge to align the state's PreK programs with our school's elementary schools. It would also allow schools to disaggregate data by grade, including Kindergarten, 1st, and 2nd grades which commonly are not included in school accountability reports. From a formative standpoint, it can also serve as an early warning system for families and teachers to identify students who need additional learning and development supports if it appears that they may not perform proficiently on 3rd grade state assessments. More information about this project can be found at: <http://earlylearningchallenge.nc.gov/activities/k-3-formative-assessment>

It will be important that if the state would choose to explore the development of implementing a K-2 or K-3 formative assessment that the state would also provide the supports for teachers and administrators about how to: a) collect observational data, b) input the data into a data collection system; c) analyze and use the data to improve the quality of instruction, and d) analyze and use the data at a systems level to improve PreK-3rd grade programs and classrooms both in the school and in community-based centers that feed into the school's elementary schools. Anecdotal evidence of KIDS implementation has shown that much of the pushback against KIDS was because teachers and administrators had little to no preparation or training that would allow them to efficiently and effectively use the KIDS assessment tool. Therefore, teachers were spending an inordinate amount of time on data collection and entry, and because they were not sure how to use the data—saw little value in KIDS as an assessment tool that could be used to inform and monitor the effectiveness of their instruction. We would advise that we learn the lessons of KIDS implementation to better support teachers and leaders to improve the implementation fidelity and quality of any assessment that we would choose for our state's accountability systems.

Models for program quality accountability systems

In 2013, Illinois implemented a revised Quality Recognition Improvement System (QRIS) to monitor the program quality of preschool programs in Illinois, including but not limited to Preschool for All programs in schools and community-based settings. This system is called ExceleRate Illinois (<http://www.excelerateillinois.com/>) administered by the Illinois Department of Human Services. This system provides a set of standards focused on four domains of program quality: 1) Teaching and Learning, 2) Family and Community Engagement, 3) Leadership and Management, and 4) Qualifications and Continuing Education. This system identifies programs according to a framework of "Circles of Quality" (Licensed, Bronze, Silver, Gold, and Awards

of Excellence). The purpose of the system is to integrate a continuous improvement process in Illinois preschool programs using data collected from multiple measures such as:

- The Early Childhood Environmental Rating Scale (ECERS), which rates program quality based on facilities, routines related to the physical care of children, teacher-student interactions, family and staff engagement, learning activities, and language and cognitive ability development;
- Documentation of teacher and administrator qualifications and continuing education activities;
- Classroom Assessment Scoring System (CLASS) teacher observation scores;
- Evidence of standards-curriculum alignment to the Illinois Early Learning and Development Standards (IELDS);
- Evidence of a Continuous Quality Improvement Plan (CQIP);
- Documentation related to the screening process for all children ages 0-5 years;
- Documentation of an assessment aligned to the IELDS;
- Evidence of family and community engagement practices; and
- Several others that can be found in the ExceleRate Illinois Quality Standards Overview.

In order to achieve the Gold Circle of Quality, independent assessors, based out of National Louis University, conduct a site visit and document review to evaluate whether the program has evidence to support Gold level of quality. Programs that achieve this level can then work toward an Award of Excellence in several focus areas: Preschool Teaching and Learning, Infant & Toddler Services, Family and Community Engagement, Inclusion of Children with Special Needs, and Linguistically and Culturally Appropriate Practice. The state provides supports and a system of professional development trainings aligned to the ExceleRate standards and Awards of Excellence focus areas so that preschool program teachers and administrators develop the knowledge and skills needed to develop high quality early childhood programming for Illinois children and set the foundation for learning in our state's K-12 school system. Furthermore, new program standards for Illinois Early Childhood Teacher Education Programs require that programs that credential early childhood teachers (Birth through 2nd grade) must have joint accreditation with Illinois State Board of Education and the Illinois Department of Human Services Gateways to Opportunity credentialing program which is one of the measures of educator qualifications for the ExceleRate system.

Currently, the ExceleRate system has been undergoing validation by researchers at the Frank Porter Graham Child Development Institute. This purpose of this study is to determine whether the performance levels indicated in the Circles of Quality correlate positively to participating child outcomes. In other words, does the performance level of programming predict child outcomes? Do children in higher quality programs have more positive outcomes than children in programs identified as lower quality? This study wraps up at the end of 2016. This system should serve as a model for a state accountability system that requires evidence from multiple measures of program and educator quality, as well as includes a cohesive system of preparation, professional development and supports. Ideally, the K-12 school accountability would align with our state's preschool accountability system to promote an aligned and shared vision of teaching and learning that moves from an accountability system that relies on sanctions to an accountability system that focuses on continuous improvement and supports that spans P-12.

Section 4: Supporting Excellent Educators³

ISBE Question: How might Illinois plan to allocate Title II funding specifically meant to support recruiting, preparing, and developing high quality teachers and principals, including by taking into account the shortage in the bilingual teacher workforce?

CSEP recommends the use of Title II funding for a couple of different initiatives, including support for full-time, semester-long internships; professional development support for principals on meeting the learning and development needs of English Learners, students in the early childhood grade span (birth through 3rd grade), students with special needs, family and community engagement;

Using Title II funding to support full-time, full-semester internship for principal candidates

In 2013, a U.S. DOE SLP grant was awarded to three high-need school districts and their university partners in Illinois. Through this grant – called the Illinois Partnerships to Advance Rigorous Training (IL-PART), these universities/districts have piloted an intensive full time/full semester long internship model that provides a longer duration of full-time, job embedded experiences. The full-time, full-semester internship provides a longer duration of full-time, job embedded experiences for principal candidates that is a more cost effective (approximately \$25,000 for the full time sub) and replicable strategy than the full-year, full-time internship model (costing between \$75,000-\$90,000 a candidate) used by several principal preparation programs such as New Leaders and UIC Urban Education Leadership program⁴. The candidates that participated in the full-semester internship were placed only in the three high need districts, but came from neighboring districts. Therefore, this project has allowed CSEP to develop practical strategies for implementing this that have been tested by mid-sized and rural district across the state.

Practical strategies for working with districts and candidates doing the full-semester internship have been developed in regards to:

- Working within compliance of the Affordable Care Act and how this affects substitute teacher benefits
- Working with teacher evaluation requirements and aligning the full-semester internship during off-year teacher evaluation cycles
- Identification and placement of quality substitute teachers to avoid negative impact on student learning
- Utilizing this model for successful succession planning to grow and sustain the principal pipeline

In addition, documents that have been created to help message the new internship model, cost out the substitute costs for districts, and retain candidates in the district after the release from their teaching duties will be shared. CSEP recommends that ISBE consider the use of Title II

³ Pages 26-31 of A Reader's Guide for the ISBE ESSA State Plan Draft #1

⁴ Not all of the principal candidates were able to participate in the full-semester internship and instead opted to do the traditional internship model. An evaluation of the grant is studying the extent of differences between the two internship models – full time/full semester versus traditional internship model - by tracking outcomes during both the pre-service phase and after graduates are hired into principal positions. The pre-service phase of the evaluation studied program satisfaction and fidelity of implementation. The in-service phase will study impact on student growth and other metrics involved in the principal performance evaluation.

dollars to create a competitive grant program in which candidates can apply to participate in the full-time, semester-long internship during their principal preparation program. If they were allowed to do the internship within their own districts, districts could use this as a succession planning strategy and candidates can provide support to practicing principals during the internship experience. Appendix A includes a crosswalk among the ESSA title II requirements and Illinois' current requirements for principal preparation programs, showing that no policy changes will be needed in order for ISBE to access Title II funding to support this work.

ESSA Evidence-Based Requirements: Activities for principal preparation programs that include classroom-based education, school-based internship, and advanced degrees of certification (Fuller, Young, and Baker, 2011) qualify under Tier III for ESSA (see <http://www.wallacefoundation.org/knowledge-center/Pages/School-Leadership-Interventions-Every-Student-Succeeds-Act-Volume-1.aspx>). Illinois' principal preparation requirements are also aligned with Darling-Hammond, LaPointe, Meyerson, Orr, and Cohen (2007).

Micro-Credential Professional Development Programs for Principals in Areas of Need (e.g., working with families and communities, working with diverse students, supporting transitions throughout the pipeline (early learning to elementary, elementary to middle, middle to high school, high school to college).

An IERC study (see <http://ierc.education/wp-content/uploads/2016/07/2016-Navigating-the-Shift-Policy-Brief.pdf>) that evaluated the new P-12 Principal Preparation programs in Illinois found areas where more supports were needed for principals, especially in working with high need students including early childhood and English Learners. As the student population shifts dramatically in Illinois – reported in a recent Chicago Tribune article that in four years in Illinois, the minority student population will be a majority (see <http://www.chicagotribune.com/news/local/breaking/ct-illinois-minority-majority-child-population-met-20160916-story.html>), more training is needed for principals to support all students. This includes not only training on how to work with diverse student populations but also how to work with families and communities to elevate the supports. CSEP recommends the use of Title II funding to support the development of a micro-credential professional development modules for principals in working with students, families, and engaging communities. Such training for principals should be job embedded, based on competencies, include coaching support from an expert leader with experience in this area, and require evidence of impact.

ISBE Question: How might the state ensure that each district includes its teachers and staff in providing high quality professional learning?

National Board Professional Development Program

The National Education Association (NEA), Center for Teaching Quality (CTQ), National Board for Professional Teaching Standards (NBPTS) and National Network of State Teachers of the Year (NNSTOY) recognize the teaching continuum starting from pre-service teacher preparation to accomplished practice, to National Board Certification then to a variety of leadership roles within the profession. Currently the Illinois continuum includes pre-service (edTPA) which is modeled after NB, induction, National Board Certification and teacher leadership. In addition to having NB fit into the teaching continuum, the National Board Professional Development (NBPD) program aligns with school goals, district standards and state initiatives including the Danielson Framework for Teaching and the Illinois State Standards-Common Core. Because NB fits within the teaching continuum and the NBPD program directly supports the work of the

Illinois State Board of Education (ISBE), the request to extend this program has increased with forty seven (47) NBPD school/district based cohorts located throughout Illinois. The numbers of the cohorts have been intentionally controlled over the three year implementation as a means to learn and to develop the program with the intent of taking it to capacity in 2017-2018. A few districts which have embraced NB as their professional development program, are including NB in improving or restructuring PD in the district. Examples: West Aurora is creating a program for the third year of the continuum as an extension of teacher induction by using NB Standards to ‘build a common language’. West Aurora is also incorporating NB as part of an in district micro-credentialing system. Other districts have created incentives to recognize teachers that participate in the NBPD cohorts. Most recently, administrators have requested support in developing NB Certified Teachers into leadership roles that serve the needs of their specific districts. The National Board Resource Center (NBRC) is working to create a training to be provided to NBCTs within the NBPD schools/districts that will develop leadership skills to be used within their district which relates back to the teaching continuum.

ESSA Evidence Based Requirement: While research has not been conducted that meets the ESSA evidence requirements for the National Board Professional Development model, research on National Board certification fits within the ESSA Tier III evidence requirements. This is specific to the Harvard’s Strategic Data Project, which found that teachers in the Los Angeles Unified School District who had earned a certificate from the National Board for Professional Teaching Standards (NBPTS) were able to increase student learning by an additional one to two months compared with peers who had otherwise similar backgrounds but had not become board certified (Strategic Data Project, 2012). The study could not establish that the certification process *caused* teachers to be more effective; those teachers could have been more effective before certification. The National Board Professional Development model can also fit until Tier IV evidence research through its logic model which aligns with evidence based strategies including National Board certification.

Further, according to the Bill and Melinda Gates Foundation’s Measures of Effective Teaching (MET) Project, Teacher evaluation data from Hillsborough County, Florida, show that National Board Certified Teachers rank nearly one full standard deviation (0.9) higher than non-NBCTs when trained evaluators combine scores from written evaluations and value added measures. NBCTs make up only 5% of Hillsborough teachers, and yet half of Hillsborough’s NBCTs scored in the top 20% of the evaluations. The MET project uses a combination of written evaluation based on the Charlotte Danielson framework and value-added measure (VAM) based on student test scores from subject-specific district exams. The written evaluation is a combined score from two classroom observations, an administrator and a peer reviewer. Looking at only student test results, NBCTs on average, score half a standard deviation higher than non-NBCTs, a statistically significant finding.

Team Based Professional Development Models and Support

In an effort to build school capacity to support new initiatives for teachers, CSEP recommends that a requirement be included in any new professional development supported by the state that encourages team-based professional development that first brings responsible stakeholders together to identify the leadership and organizational capacity and supports needed for the professional development (e.g., principal understand and support to lead change, time needed for teachers to learn and apply, feedback loops for learning, etc.). Training may also include

strategies for how to distribute leadership supports across the building include the use of teacher leaders as facilitators or content experts. One of the most well-known structures for this occurs with the Professional Learning Community model, in which many districts have adopted, yet others cannot due to time, organizational, or financial constraints.

ESSA Evidence Based Requirement: Saunders, Goldenberg and Gallimore (2009) completed a quasi-experimental study that included 15 Title I schools that meets Tier II (correlational) evidence requirements. The researchers studied the implementation of a well-defined leadership framework aimed at improving teaching and learning. The leadership framework outlined in their study included the following school-based organizational practices: 1) monthly meetings between the principals and leadership coaches; 2) monthly Instructional Leadership Team (ILT) meetings facilitated by the principal; 3) bi-weekly grade-level and/or content area meetings facilitated by an ILT representative; 4) professional development; 5) technical assistance; and, 6) multiple feedback loops to inform the continuous improvement process. By implementing the leadership framework, principals and teacher leaders collaboratively establish organizational routines designed to institutionalize effective practices. Specifically, through project inputs and practices, principals demonstrated a positive change in the amount of time spent on instruction, a positive impact on teacher engagement in school-wide improvement efforts, and an increase in student academic achievement.

ISBE Question: How might Illinois ensure that state and local districts work with stakeholders to access, develop, and refine strategies to meet the state’s goal around high quality teachers and school leaders?

Systemic Models Needed that Focus on the Whole Pipeline of Development

In December 2012, the Illinois P-20 Council recommended the idea of a Diverse Educator Learning Exchange to cultivate a pipeline of diverse, academically talented educators in a coordinated effort spanning from student to teacher to instructional leader. At the most elemental level, the Illinois Pathways Initiative – and the learning exchanges that exist within it – provided a model to create partnerships and organize opportunities for students to explore a profession through coursework and work-based learning, such as internships or job shadowing. The learning exchange refers to the statewide partnership that coordinates the resources, planning and investments to support students' development within a profession – in this case, education. At present, discrete educator pipelines exist within several Illinois school districts, universities and statewide initiatives. A coordinated statewide strategy to cultivate diverse, academically talented educators could strengthen existing efforts and support new ones. The Committee suggested a continuum of supports and services that an exchange might provide at stages of the pipeline to develop Illinois students who aspire to become Illinois teachers. Funding from the Teacher Certification Revolving Fund, Minority Teachers of Illinois grant program (MTI) grant from ISAC, as well as Title II funding could be used to support this. Suggest funding, perhaps through the use of the Title II indirects, can be used for coordination and collaboration of services addressing each level of the pipeline. This can also serve as a cohesive model that might be considered for any education preparation programs.

Partnerships between higher education and the field are essential: One of the most identified success variables in Illinois’ new principal endorsement programs is the partnership model that now must exist between districts and universities in the recruitment, selection, course design,

delivery, placement, and assessment of candidates. This is solidified in a Memorandum of Understanding that each program must enter into with at least one school district or region. Recognizing the importance of partnerships, especially around clinical experiences, in 2014, the P-20 Council TLE committee was asked by ISBE to make recommendations regarding clinical experience and partnership requirements for teacher education programs. A copy of the report to ISBE with recommendations are attached (see Appendix B).

ESSA Evidence Based Requirements: Studies on principal preparation, including key elements like strong partnerships between universities and districts, have found positive impact and can be included in Tier III and Tier IV evidence levels. Of most notable is research by Darling-Hammond, LaPointe, Meyerson, Orr & Cohen (2007) that empirically connects specific university practices that have been found to improve student achievement. According to this study, effective preparation programs share common features: (1) comprehensive, coherent curriculum aligned to state and professional standards; (2) philosophy and curriculum that emphasize instructional leadership and school improvement; (3) student-centered instruction with pedagogy that integrates theory and practice and stimulates reflection; (4) faculty knowledgeable in subject area, including practitioners with school administration experience; (5) social and professional support in cohorts with expert mentoring and advising; (6) targeted recruitment and selection that proactively bring expert teachers with leadership potential into the principalship; and (7) well-designed, intensive and supervised internships under the tutelage of expert veterans.

Regional capacity supports are needed: Develop regional hubs that create collective impact models for regions to come together in preparation, induction and development to support educators, especially in rural areas. In 2014, ISBE and IBHE convened the Illinois School Leadership Advisory Council (ISLAC). Charged with developing a five-year strategic plan to support and sustain the pipeline of high-quality principals across the state, ISLAC convened more than 50 stakeholders from school districts, higher education, funders, legislators, professional organizations and other groups that were broken into four main study teams. The recommendations of these ISLAC study teams focus on four broad domains of action: Programs, Quality Assurance, Partnerships, and Networks. One of the recommendations of ISLAC was the development of **regional partnerships for the distribution of leadership preparation resources to all school districts in Illinois**, providing school districts and Institutions of Higher Education with mechanisms for the recruitment, selection, and support of principal mentors and leadership coaches to ensure the continuous enhancement of leadership capacity in Illinois. Such regional hubs could be positioned to address Educator Effectiveness by building regional/community capacity for succession planning for educators that assure that the supply pipeline is consistent with projected vacancies and pooling resources within the community to provide continuous supports to practicing educators in our schools. Following this ‘collective impact’ approach, these hubs will coordinate existing organizations, services and supports in the community; thus creating efficiencies of scale rather than the “silo” systems of support that exist most commonly in any community.

Creation of Quality and Transparent Data to Districts and Universities Around the Educator Pipeline

One of the greatest challenges to developing and refining strategies to meet the state’s goal around high quality teacher and school leaders is the lack of reliable data collected and made

accessible by district, regional offices of education, or universities. Currently, ISBE requires districts and preparation programs to input a limited number of metrics regarding preparation and development of teachers and principals. In recent years, stakeholders have raised numerous concerns about the reliability and validity of data available to adequately inform improvement efforts.

While the responsibility for developing and recruiting a sufficient supply of high quality teachers and principals to meet local demands lies primarily with universities and districts, there is also a responsibility at the state level to reliably collect state, regional, and local data that can inform improvement efforts to educator preparation and development. **There currently exists no single repository for data necessary to adequately inform a report on the supply and demand of principals in Illinois.** For example, when it comes to principal preparation, a number of organizations have stepped forward to collect and distribute data involving student enrollment in new programs, annual principal vacancies, number of principal endorsements issued, etc. Those interested in improvements in this area are forced to weave together disparate measures and data from various sources into an incomplete picture of the current state of leadership preparation and development in Illinois.

To address policy questions strategically and accurately, it is crucial that the state develop valid and reliable measures and systems of data collection. The Illinois School Leader Advisory Council recommended that ISBE serve as a repository for data collected from preparation programs, districts and/or regional offices of education and that they provide password protected access to each on a range of metrics so that they can track outcomes beyond program completion⁵. Recommended metrics to be collected by the state include:

1. Total number of candidates currently enrolled in the program (including percentage of racial and gender minorities)
2. Total number of graduates that year (July 1- June 30) (including percentage of racial and gender minorities)
3. Total number of candidates that year that attempted the principal endorsement exam (including percentage of racial and gender minorities)
4. Total number of candidates that year that passed the principal endorsement exam (including percentage of racial and gender minorities)
5. Total number of principal endorsement program graduates that year that earned Principal Endorsements (including percentage of racial and gender minorities)
6. Total number of principal endorsement program graduates that obtain principal positions in 1, 2, and 3 years beyond completion of principal prep program, since inception as a principal endorsement program (including percentage of racial and gender minorities)
7. Percentage of principal endorsement graduates in principal or assistant principal (AP) positions that have been rated in each of the 4 performance categories on evaluations that comply with PERA (including percentage of racial and gender minorities)
8. Percentage of principal endorsement program graduates in principal or AP positions who lead schools that demonstrate positive, flat, or negative student growth, as defined in PERA (including percentage of racial and gender minorities)
9. Percentage of principal endorsement graduates in principal or AP positions that demonstrate positive, neutral, or negative impact based on a state mandated school climate and culture survey (including percentage of racial and gender minorities)

⁵ ISBE is also supporting an initiative called Partnership for Educator Preparation (PEP) that is working on strengthening data collection, sharing and accountability for teacher preparation.

10. Principals who completed principal endorsement programs and are promoted to district/regional leadership positions (including percentage of racial and gender minorities)

Further, ISLAC recommended that the state should consider implementing three key strategies prior to making any further changes to the regulations governing principal preparation: 1) develop a longitudinal data system that collects and stores a wide variety of metrics that can more accurately inform supply and demand studies and support the development of a strong pipeline of effective principals; 2) identify regional differences in supply and demand and ensure equitable distribution of resources to support an adequate pipeline of school leaders for every district in the state; and 3) support district level implementation of effective talent management practices, such as developing a clear leadership vacancy strategy and improving recruitment, selection, training, and retention of principals and assistant principals. These three key strategies are essential for the state to determine a clear picture of supply and demand, but more importantly, to ensure preparation and development efforts result in a system whereby our schools are led by effective principals and staffed by high quality teachers capable of improving student outcomes.

Section 4: Questions for Further Consideration

ISBE Question: How might Illinois plan to use federal professional development funds and/or Teacher and School Leader Incentive Fund grant fund (Title II) to support the ongoing implementation of its system, and to continue to inform professional development? Is there a need to review the current teacher evaluation system? How is the current system working?

Illinois State Personnel Development Grant

For over a decade, Illinois has received funding by the U.S. Department of Education’s State Personnel Development Grant (SPDG) program to improve the preparation and professional development of administrators, teachers, and support staff on Response to Intervention (RtI), now Multi-Tiered Systems of Support (MTSS). The primary goal of this grant is to “*Scale up implementation of a coordinated, statewide system of personnel development that will increase the capacity of school systems to establish and use a multi-tiered model of scientific, research-based instruction, intervention, and assessment to improve the progress and performance of all students, including those with disabilities.*” The Illinois SPDG project has been and continues today to provide coaching and technical assistance to educators on research-based strategies to improve district and statewide performance in graduation rate, disproportionality and over-identification of students identified as needing special education services, decreasing suspension/expulsion rates, and increasing numbers of students served in the Least Restrictive Environments (LRE). CSEP staff members have served as members of the external evaluation team for this grant since 2010. The findings of this evaluation over time have some important implications for how this professional development grant could be used to provide professional development for Illinois educators to improve our education system.

First, over 6 years of evaluation data from surveys, focus groups, and interviews have uncovered the importance of district and school administrative commitment and engagement in leading MTSS initiatives through District/Building Leadership Teams (e.g., goal setting and planning and coaching/PD), as well as through monitoring the implementation of MTSS practices in

classrooms through observation and PD of teachers (eg., evaluating teaching and the curriculum and data-based root cause analyses).

These findings also directed us to consider the importance of principals' commitment to the MTSS initiative in their buildings. In high schools, it may be more important for the principal to concentrate on supporting teachers through supporting MTSS as a priority in the building, and providing teachers with the resources they need to implement MTSS with fidelity rather than participating in classroom MTSS implementation directly. However, for elementary schools, principals should also include the instructional leadership practices that are characterized by more meaningful and direct involvement in the classroom and working with teachers to implement MTSS practices using data (observation and quantitative data) to examine fidelity and effectiveness of implementation.

The review of this data also showed the value of the parent/family engagement component of the IL-MTSS framework. Family engagement had consistently low implementation ratings in districts across the state as district administrators made the decision to concentrate on MTSS areas that they felt had higher priority such as developing and implementing academic supports for students. The belief was that the family engagement work could come later even though there is research demonstrating the importance of family engagement on student success. Therefore, this illustrates the need to develop leaders and teachers who work to increase family engagement on leadership teams and in the classrooms. Administrators and teachers need more explicit training on the collective leadership model that describes how administrators, teachers, staff, and parents work collaboratively together to improve student outcomes

Final recommendation: Past SPDG initiatives may not have given as much attention to the importance of developing the leadership skills of district and school administrators. If administrators have been a focus, it may have been mostly related to RtI/MTSS-specific content. However, there may need to be more attention paid to link MTSS processes along with evidence-based leadership practices (in general) so that administrators do not see MTSS as an add-on, but as an integral part of improving their schools and student outcomes, as well as improving their general leadership skills so that they can lead teachers and staff more effectively to implement MTSS. In addition to coaches at the central office level, principals could receive training on coaching so that they were more integrally involved in supporting teachers in the classroom. Another area of training that would be valuable is in the area of using data and collective leadership practices to establish communities of practice to identify problems and use root cause analysis in cycles of inquiry to solve areas of ineffective practices.

As of this writing, the Illinois Multi-Tiered Systems of Support Network (IL-MTSS-N) is developing the new framework for MTSS in Illinois that will guide the implementation of the 2015 IL SPDG project focusing on building a system that improves outcomes related to College and Career Ready Students, Effective Teachers and Leaders, and Safe and Healthy Schools. It is our recommendation that ISBE uses the IL-MTSS-N project as a model for professional development systems for teachers and leaders in both the coaching and technical assistance PD format as well as the research-based strategies used to inform the content of educator preparation and professional development.

Teacher Evaluation

For the last four years, CSEP has been studying the use of *The 2013 Danielson Framework for Teaching* in early childhood classrooms (PreK-3rd grade) in Illinois, as well as developing resources and providing PD to administrators and teachers to support their use of the Framework to evaluate the performance of PreK-3rd grade teachers. This study took place in several districts and early childhood centers throughout Illinois (Northern, Central, Southern Illinois, and Chicago) in fall 2014 involving 26 teachers in grades PreK-3. This study collected measures of inter-rater reliabilities, correlates of observations to student assessment data, and the quality and accuracy of observation evidence.

What this study found was that overall the inter-rater reliabilities across Domains 1-3 (Planning & Preparation, Learning Environment, and Classroom Instruction) found an overall average of 67%. Across the 17 components observed in this study within the domains, the range was 42% to 92%. Of the 17 components, seven components had lower than average inter-rater reliabilities. Of these seven components, four were related to the design and use of assessments in the classroom. Teachers and administrators had difficulty designing and differentiating student outcomes, formative assessment in the classroom was not clearly implemented, and thus, teachers were not clearly using formative assessments to be flexible and responsive to the learning needs of their students.

A qualitative analysis of the observation data found inconsistent descriptive evidence across observations. A large amount of the evidence was not at the depth needed to make a clear distinction about the teaching and learning practices and outcomes that were observed. For example, observers often did not provide descriptive information about designing assessments in the planning phase and the observation notes in the Classroom Instruction domain were vague describing implementation of formative and summative assessments. For the most part, descriptions of assessment tended to be over-generalized with “checking/monitoring for understanding” as the most common descriptor.

Further, in an analysis of the alignment of the observation evidence with the identification of critical attributes, there was often a misalignment between the observation evidence provided and the critical attributes chosen. This was often due to one of the following problems:

- Observation evidence was not accurately sorted into the proper domain component, and/or
- Observation evidence was missing or not specific enough to support the critical attributes chosen.

Based on our findings, we recommend that the state provide more training and supports for district personnel around collecting accurate and reliable observation data that will lead to more valid teacher evaluations. We also recommend that teachers and administrators receive PD and resources on the assessment process that begins with designing differentiated student outcomes based on student data and continues with how to design quality assessments and use the data to make better decisions about differentiating instruction. Furthermore, teachers and administrators need PD on how to use the broad scope of both summative and formative assessment data that we collect on students to get a better picture of student learning and development needs for planning and implementing appropriate instruction and to allocate resources where the need is the greatest. Finally, we recommend that instructional leaders and teachers receive more PD about how to engage in a teacher evaluation process that involves an effective coaching

process through effective planning and post-observation conferences, as well as follow-up coaching conferences and instructional support practices throughout the school year. This focus on teacher evaluation as providing data to support coaching and instructional leadership will promote our state's educators to implement a teacher evaluation system not just for compliance but for the continuous improvement of teachers' professional practice in classrooms across the state. More information about the preliminary results of this study can be found on a white paper at this link: http://education.illinoisstate.edu/downloads/csep/Final_Danielson%20white%20paper.pdf

Section 5: Supporting All Students

ISBE Question: ISBE requests additional suggestions for ways it may consider the use of Title IV, Part A funds to provide all students with access to a well-rounded education and improve student conditions for student learning⁶.

It is essential to understand that students learn in multiple domains and that schools working alone cannot easily meet all of the developmental needs of students. Community schools have a great ability to improve student conditions for student learning. The community school model provides a framework for effectively partnering to bring in resources (e.g. social services, health clinics, businesses, food banks, family supports, higher education institutions, etc.). These resources allow for students' needs to be met while teachers are able to better focus on academic strategies knowing students' conditions are being met elsewhere. Not only have community schools been able to show evidence of academic achievement but lower chronic absent rates, higher family engagement outcomes and significant additional resources to schools (http://www.aft.org/ae/fall2015/blank_villarreal). In particular, in areas with high English Learners, community schools may be able to leverage community resources to support both in-school and out-of-school learning.

Additionally, community school efforts are being recognized by other funding sources such as foundations and United Ways. This model is creating access for school districts to nontraditional education funding sources. As many times these funders require matching funds or a show of support from school districts, mechanisms that allow for the braiding of funding and support for community school models should be supported. Additionally, ways that schools can be held accountable for partnering to meet health and wellness needs of student would support partnerships between communities and schools.

Beyond community schools, support of education focused community collaborations, like those utilizing a collective impact framework (<https://collectiveimpactforum.org/what-collective-impact>), should be considered. These collaborations encourage accountability of the community to support schools and student outcomes. They also provide access to critical community stakeholders. Further, they may provide access to other expertise from other sectors which can help identify evidence-based supports for students and input to student learning outside the classroom (<http://www.hbs.edu/competitiveness/research/Pages/research-details.aspx?rid=75>). Any ways that ISBE and local districts can encourage participation in from school districts in community collaborations should be support – examples of this might include better mechanisms for districts to participate and the ability to more easily share unidentifiable student outcomes with external stakeholders.

⁶ Page 37 of *A Reader's Guide for the ISBE ESSA State Plan Draft #1*

ESSA Evidence-Based Requirement: A 2014 Child Trends meta-analysis reviewed 11 evaluations of three different community school models, all of which focused on “a system of wraparound supports for the child, the family, and schools, to target student’s academic and non-academic barriers to learning.” The analysis yielded mixed results including small but statistically significant effects of integrated student supports on student academic progress across the majority of the evaluations, as measured by:

- Decreases in grade retention and dropout rates; and
- Increases in attendance, math and English language arts achievement, and overall grade point averages.

The effect sizes were larger in quasi-experimental studies than in more rigorous random assignment evaluations; therefore, the evidence base for Community Schools may fall more under the Tier II evidence level.

A Tier I evidence level study was done on the national Communities In Schools (CIS) program over five years of implementation. The study examined school-level effects using a quasi-experimental design and found positive effects on eight of 10 outcomes, including drop out and graduation rates, and attendance at the elementary, middle, and high school levels. “High implementer” schools posted “substantively important positive effect[s]” for dropout and graduation rates, elementary level attendance, and math and reading performance in the middle grades. The study also examined student-level impacts using randomized controlled trials, and found a number of positive effects in two of three districts studied; impacts were especially notable for middle school reading (in Jacksonville); and credit completion, high school attendance, and grade point average (Austin). These results are based on the incorporation of key elements, including:

- an on-site coordinator in each school;
- delivery of both whole-school supports (e.g., health services) and targeted services (counseling, academic assistance, mentorship); and
- on-going reporting to school leaders and CIS affiliates.

The study noted the requirement of significant resources, as well as buy-in from school leadership to support site coordinators in identifying at risk students, managing individual needs assessments, and providing referrals. The study also noted conditions of implementation that yielded the most promising effects:

- Integrated services targeted at transition points.
- High fidelity of implementation and on-site coordination.
- Two years of exposure.

Need to Share with Districts Strong Models for Community Assessments

ESSA will provide formula grants to districts through Title IV funds (Student Support and Academic Enrichment funds). However, to access funding, districts must conduct a district-wide needs assessment. To assure that quality and appropriate needs assessments are conducted that consider the needs of all stakeholders in which a district touches (parents, community, early learners, high need students), we recommend that ISBE identify some models of strong district or community assessments and provide technical support to districts to help them through this process.

There are several existing initiatives in Illinois who use community and/or district needs assessments to strategically collect data on the needs of families and students in their communities and use that data for strategic planning. First, since 2012, the Illinois Governor's Office of Early Childhood Development has funded 11 Early Childhood Innovation Zones in communities across the state. The purpose of the Innovation Zones are to work in early childhood collaboratives to coordinate and align the early childhood education and systems of services for families and young children. The targeted populations include children from families facing homelessness, teen parents, children in poverty, and families and children who have language barriers. The two priority strategies are to increase access and enrollment of these children into preschool programs, and to improve the quality of preschool programs these children attend. In order to be able to efficiently and effectively plan for and implement their work, zone communities are required to use data from a needs assessment to identify needs, create a strategic action plan, and evaluate and reflect on the zone's progress to make improvements where the data shows they're needed. Illinois Action for Children provides technical assistance and support to these communities and would be able to provide examples of the needs assessments used.

Another example of an initiative that uses needs assessments to guide the planning and implementation of programming would be Community Schools. There are several resources made available on both the Coalition of Community Schools (http://www.communityschools.org/resources/needs_and_capacity_assessments.aspx) and the Federation of Community Schools (<http://ilcommunityschools.org/images/FSCS%20Grant/Community%20Needs%20Assessment%20-%20ALL.pdf>).

ESSA Requirements for Early Childhood Education

ISBE Question: IL will need to determine if they will use Title 1 funds for early childhood education. If so, their plans must further develop and describe the district's existing and/or new strategy to support participating students' transition to local elementary schools. In addition, currently only 40% of Latino children statewide attend early childhood education programs. Equitable access to these programs must be considered.

The Child Parent Center (CPC) program is a PreK-Grade 3 intervention that provides comprehensive educational and family-support services, primarily in low-income neighborhoods. The goal of the CPC program is to improve early childhood education through family engagement and high quality instruction, making the transition to the next grade easier. Established by the Chicago Public School District in 1967, the CPC has demonstrated for over four decades that it is one of the nation's most effective educational reform strategies. Although the program originated in CPS, it has been expanded to Evanston School District and McLean County Unit #5 Schools and is a model included for replication in the State of Illinois PreK Expansion grant.

ESSA Evidence Requirements: The CPC model meets Tier I evidence requirement through several studies and have been shown to have significant impact on children and families with the following:

- Increased kindergarten readiness

- Increased school and parent involvement
- Increased school attendance
- Increased student motivation
- Increased self-regulation of skills
- Decreased behavioral challenges

CPS is using the CPC model through a Pay for Success program that will allow it to be replicated to schools throughout the city. Based on the longevity of documents outcomes for the CPC model, including:

- Data collected on program alumni through age 26 indicate that the CPC program has high economic returns to society.
- Benefits include savings in the criminal justice system for delinquency and crime prevention, increased tax revenues as a result of higher levels of educational attainment and career success, savings for reduced levels of special education placement, and savings in child welfare for reduced rates of child abuse and neglect.

Dear ISBE ESSA TEAM,

This is in reference to the ESSA Illinois State Plan Draft #1 dated 9/15/16 on the ISBE website, p. 61, section 5.2, Part C: Education of Migratory Children, Tutorial Support During the Regular School Year.

I support having a mandated 3% set aside (of Title I funding) for Direct Student Services Tutoring as part of the new "Every Student Succeeds Act" for the current 2016-17 school year. Under the previous NCLB Act, parents had 2 rights (the right to change to a higher performing school and the right to receive supplemental tutoring services). It is important that parents have a voice in the educational policies in the state of Illinois. ISBE already had a list of approved (under No Child Left Behind) supplemental educational services providers on their website. These approved SES providers (from NCLB) should be included as part of the list of approved state providers for Direct Student Services Tutoring.

Chess Academy was one of the approved ISBE SES providers (providing educational services from 2006-2014) with outstanding reading and math gains. Please see attached study (CPS SES Eval p. 18) by Chicago Public Schools that showed 23% ISAT math gains by Chess Academy.

Thank you,

John P. Buky
Chess Academy Manager
The World's First Integrated Reading, Math and Chess Curriculum!
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Phone: 773-414-2967
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The 2007 Supplemental Educational Services Program:
Year 4 Summative Evaluation

October, 2007

Curtis J. Jones, Ph.D.
Senior Research Analyst
Office of Extended Learning Opportunities
Chicago Public Schools



Executive Summary

As part of No Child Left Behind, low-income students who attend schools that have been identified as “in need of improvement” for three consecutive years are eligible to receive free math and reading tutoring services known as Supplemental Educational Services (SES). To evaluate the impact of the 2006-2007 SES program within the Chicago Public Schools (CPS), achievement gains from the 2006 to the 2007 ISAT, of SES participants in grades four through eight were compared to other low-income students attending the same schools that did not receive SES. In addition, the impact of specific SES program providers was tested by comparing the achievement gains of students in each program to non-participating eligible students. As an additional component, the impact of the district provided SES program (AIM High) was compared to the group of students tutored by other private providers. Finally, the relative cost-effectiveness of the different SES providers was assessed.

Findings

- Students in the SES program demonstrated a significantly greater gain in both reading and math achievement compared to other low-income students attending the same schools that did not receive SES tutoring. After accounting for differences due to demographic characteristics and prior achievement, SES participants demonstrated a 5% greater reading gain and a 13.2% greater math gain than would be expected had they not participated. These results are in contrast to those found in the CPS evaluation of the 2005-2006 SES program, where SES participants were found to gain more in reading than math.
- The number of tutoring hours students received related to the size of participant math achievement gains but not reading. Students receiving 30 to 40 hours of tutoring demonstrated 6.3% greater math gains than expected had they not received SES tutoring, while students receiving more than 70 hours gained 23.3%.
- Although the SES program was found to positively impact students in general, certain groups of students demonstrated a greater benefit from SES participation:
 - Students with disabilities averaged 11.7% greater than expected reading and 16.6% greater math gains while students without disabilities averaged 3.8% greater reading and 12.2% greater math gains.
 - 6th and 7th grade SES participants received the greatest benefit from SES on their math achievement, while 4th grade participants received the least. 6th grade students averaged 16.0% greater math gains than was expected had they not received SES tutoring and 7th grade students averaged 17.8% greater math gains, while 4th grade students averaged 8.8% greater math gains.
 - Male students demonstrated a greater benefit from SES on their math achievement than did female students. Males SES participants averaged 16.8% greater gains than expected, while female participants averaged 10.0% greater gains in math.

- Among the SES providers, students in the A+ Tutoring Service, Ltd., CS&C Inc.-Julex Learning, One-to-One Learning Center, Socratic Learning, Unparalleled Solutions, Inc., Catapult, Huntington Learning, and AIM High (CPS) programs all demonstrated significantly greater reading achievement gains than students eligible for SES that did not participate. The gain demonstrated by students in the Socratic Learning program was the largest at 50.2% greater than expected had they not received SES.
- Students in the A+ Tutoring Service, Ltd., Unparalleled Solutions, Inc., The Princeton Review, Inc., Progressive Learning, Inc., School Service Systems, Catapult, and AIM High (CPS) programs all demonstrated significantly greater math achievement gains than students eligible for SES that did not participate. The benefits demonstrated by students in the A+ Tutoring Service, Ltd program was the largest at 37.6% greater than expected.
- No providers demonstrated significantly lower math achievement gains than was predicted had their students not received tutoring.
- Students tutored by the least expensive provider, AIM High, demonstrated reading achievement gains comparable to students tutored by other, more expensive private tutoring programs. Further, AIM High students demonstrated significantly greater math achievement gains (16.7%) than did the group of students tutored by the other SES providers taken collectively (11.0%).
- Although, there is a large difference in costs between providers, with the AIM High program costing \$489 per student and the other providers averaging \$1,716 per student, program cost did not correlate with student achievement gains.
- AIM High was one of only four providers, along with A+ Tutoring Service, Ltd., Unparalleled Solutions, Inc., and Catapult, that demonstrated a significant impact on both the reading and math achievement gains of students.

If you would like additional information regarding this report you may contact:
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The 2007 Supplemental Educational Services Program:
Year 4 Summative Evaluation

This report presents a summative evaluation of year four (2006-2007) in the implementation of the SES tutoring program in the Chicago Public Schools. As part of No Child Left Behind, low-income students who attend schools that have been identified as “in need of improvement” for three consecutive years are eligible to receive free math and reading tutoring services known as Supplemental Educational Services (SES). These tutoring services are offered by private providers and the school district, all of whom are pre-approved by the Illinois State Board of Education. SES services may include academic assistance in math and reading such as tutoring, remediation, and other educational interventions.

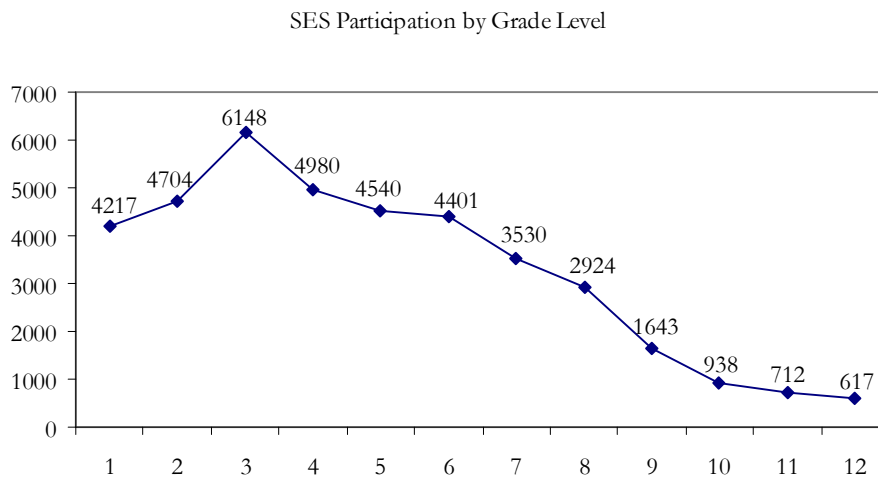
In this report, characteristics of SES participants and providers are examined along with the impact of the overall program on the achievement of elementary school students, the impact of each SES provider on the achievement of elementary school students, and the impact of providers relative to their costs. Finally, the impact of the district SES program (AIM High) is compared to non-district programs.

Characteristics of SES participants

During the 2006-2007 school year, approximately 230,644¹ CPS students were eligible for SES. 50,204² students initially registered to receive tutoring in the fall. Of these, 44,223 (19.2%) students enrolled in the SES program. During fall semester, additional students were identified as interested in receiving SES. In the spring, these students were given the opportunity to sign up for the CPS SES program, AIM High. An additional 3,948 students registered for the tutoring services in the late winter and 2,118 students eventually enrolled.³

Program attendance data were available for 39,354 students across 295 schools.⁴ SES participants represented all grade levels, but were most represented in elementary school, and especially third grade, with over 6,000 students participating (Figure 1).

Figure 1



¹ Data valid as of September, 2006.

² Data valid as of October, 2006.

³ Students that enrolled in the spring to receive AIM High are not included in the analyses found within this report.

⁴ SES participation was tracked in the online STARS data system, with providers tracking their own student attendance. It is apparent that the attendance of some students were not tracked in the system.

Participants were nearly equally divided between males (19,361) and females (19,978). The racial breakdown of SES participants was different than the general CPS elementary school population; SES participants were more likely to be black and less likely to be white, Hispanic, or Asian (Table 1).

Table 1: Racial breakdown of SES participants compared to the general student body

	SES Participants		CPS Students	
White	411	1.0%	45,881	9.7%
Black	27,424	69.7%	227,058	47.9%
Native American	23	0.1%	829	0.2%
Asian	259	0.7%	16,865	3.6%
Hispanic	11,222	28.5%	183,824	38.7%

As a group, participating students were in need of tutoring services; The SES program provided tutoring to 4,937 students with disabilities, 3,358 students in a bilingual program, and 6,798 previously in the bilingual program. Also, SES participants represented a lower achieving group of students than other low-income students that attended SES schools. The baseline Illinois Standards Achievement Test (ISAT) reading performance levels of 57.7% of SES participants placed them in the below or warning categories, while the performance of 52.2% of eligible students placed them in these categories (Figure 2). In math, 50.2% of SES participants were in the below or warning achievement categories, compared to 45.5% of eligible non-participants (Figure 3).

Figure 2

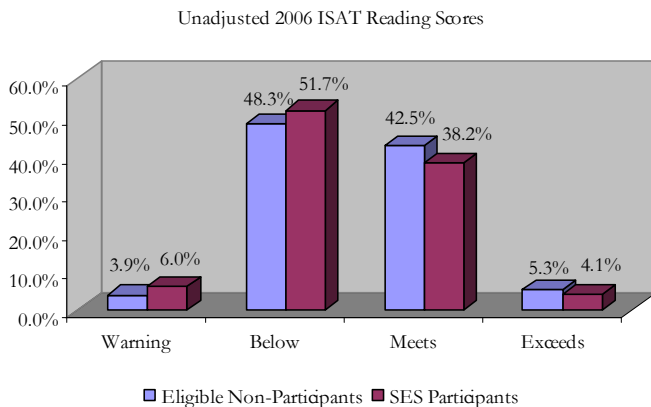
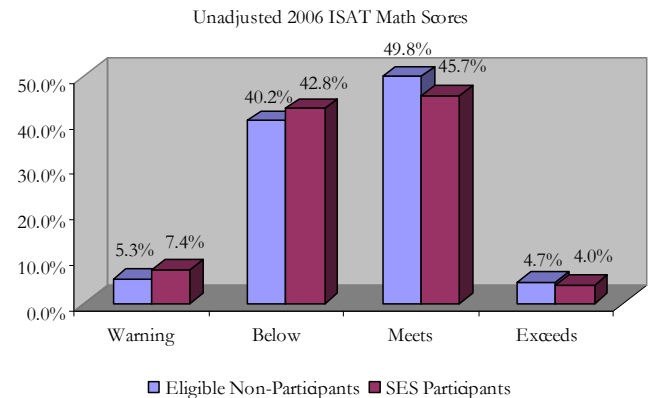


Figure 3



Characteristics of SES Providers

SES programs were selected by the Illinois State Board of Education (ISBE) through an RFP process. In the 2006-2007 academic year, 45 programs were selected to offer tutoring services to Chicago students. All but six providers offered tutoring in both math and reading. Most providers offered tutoring onsite, within the school, while four providers also offered online programs, and 11 programs offered offsite tutoring. The number of hours of tutoring providers were approved to offer students ranged from 30 to 80. Most providers offered tutoring to both students with disabilities and English as a Second Language (ESL) students. The A.I.M. High program offered by CPS was the most widely utilized program, with over 14,000 enrolling to receive tutoring. A.I.M High was also by far the least expensive program, costing anywhere from 27% to 40% as much per student as others. Table 3 summarizes the characteristics of the different provider programs and Table 4 summarizes program participation.

Table 2: Descriptive Information of SES Providers

	Grade Levels	Tutoring hours	Cost /Student	Tutoring Areas	Offsite	Online	Onsite	Special Ed	ESL
A.I.M. High - CPS	1-12	80	489	Reading and Math			x	x	x
A+ Tutoring Service, LTD	1-8	60	1761	Reading and Math			x	x	x
Achieve 3000	3-12	60	1740	Reading		x		x	x
African American Images Talent Center	1-12	50	1464	Reading and Math					
Alternative Unlimited	1-12	35	1761-1833	Reading and Math	x		x	x	x
ASPIRA	6-12	80	1761-1833	Reading and Math	x		x		x
ATS Educational Consulting Services	1-8	45	1800	Reading and Math		x		x	x
Brain Hurricane, LLC	1-8	40	1761	Reading and Math			x	x	x
Brainfuse	3-12	44-46	1761-1833	Reading and Math		x	x	x	x
Brilliance Academy	1-12	50	1761	Reading and Math			x		x
Cambridge Educational Services	1-12	40	1761	Reading and Math			x		
Catapult	3-12	32	1833	Reading and Math		x		x	x
Center of Higher Development	1-3	30	1761	Reading and Math			x		
Champions	1-8	60	1761-1833	Reading and Math	x		x	x	x
CHASI	1-8	50	1761	Reading and Math			x	x	x
Chess Academy LLC	1-8	60	1428	Math			x	x	x
Chi Tutorsz	1-12	60	1761	Reading and Math			x		x
City Year	1-5	45	1669	Reading			x		
Club Z! In-Home Tutoring Services	1-12	35	1750	Reading and Math			x	x	x
CS&C, Inc.-Julex Learning	1-8	60	1520	Reading and Math			x		x
Education Station, A Sylvan Partnership	1-12	60	1761	Reading and Math			x	x	x
Educational Specialties	2-12	44	1761	Reading and Math			x		
Erie Neighborhood House	1-6	50	1699	Reading	x			x	x
Failure Free Reading	1-12	40	1761	Reading			x	x	x
Huntington Learning	1-12	40	1728-1800	Reading and Math	x		x	x	
KnowledgePoints	1-12	60	1761-1833	Reading and Math	x		x	x	
Kumon	1-12	48	1237	Reading and Math	x				
Literacy for All	1-8	51	1562	Reading and Math			x	x	x
Marilyn G. Rabb Foundation dba MGRF	1-12	60	1528	Reading and Math			x		x
Newton Learning	1-8	60	1761	Reading and Math			x	x	x
Non-Public Educational Services	1-8	50	1678	Reading and Math			x		x
One-to-One Learning Center	1-12	80	1620	Reading and Math			x	x	x
Orion's Mind	1-8	40	1761	Reading and Math			x		x
Platform Learning, Inc.	1-8	30	1761	Reading and Math			x	x	x
PODER (Central States SER)	3-8	60	1761-1833	Reading and Math	x		x	x	x
Progressive Learning	3-8	40	1761	Reading and Math			x	x	x
Reading in Motion	1, 3	60	1761	Reading			x		x
School Service Systems	1-12	60	1753	Reading and Math			x	x	x
Smart Kids, Inc.	1-8	60	1723	Reading and Math	x			x	x
Socratic Learning	3-12	50	1761-1833	Reading and Math				x	x
Spectra Services	1-8	50	1761	Reading and Math			x		x
The Princeton Review, Inc.	1-12	60	1707	Reading and Math			x	x	x
Train up a Child - Homework Mastery	1-12	60	1761-1833	Reading and Math	x		x	x	
Unparalleled Solutions, Inc.	1-12	80	1596	Reading and Math			x	x	x
Wicker Park Learning Center	1-12	60	1728-1800	Reading and Math	x		x	x	x

Table 3: SES Registration, Enrollment, and Attendance

Provider	Registered	Enrolled
A.I.M. High - CPS	16,648	14,760
A+ Tutoring Service, LTD	945	925
Achieve 3000	91	31
African American Images Talent Center	209	184
Alternative Unlimited	166	84
ASPIRA	194	101
ATS Educational Consulting Services	46	45
Brain Hurricane, LLC	389	372
Brainfuse	993	782
Brilliance Academy	1,572	1,548
Cambridge Educational Services	959	861
Catapult (online)	2,426	1,465
Center of Higher Development	83	83
Champions	1,687	1,510
CHASI	71	70
Chess Academy LLC	179	177
Chi Tutorsz	21	18
City Year	18	11
Club Z! In-Home Tutoring Services	2,052	1,959
CS&C, Inc.-Julex Learning	375	327
Education Station, A Sylvan Partnership	3,610	3,293
Educational Specialties	289	265
Erie Neighborhood House	20	17
Failure Free Reading	416	405
Huntington Learning	953	495
KnowledgePoints	129	82
Kumon	56	37
Literacy for All	129	126
Marilyn G. Rabb Foundation dba MGRF	44	10
Newton Learning	4,103	3,966
Non-Public Educational Services	55	55
One-to-One Learning Center	296	256
Orion's Mind	183	146
Platform Learning, Inc.	1,740	1,724
PODER (Central States SER)	93	83
Progressive Learning	1,899	1,830
Reading in Motion	90	90
School Service Systems	793	748
Smart Kids, Inc.	47	10
Socratic Learning	1,360	1,228
Spectra Services	144	136
The Princeton Review, Inc.	3,614	2,952
Train up a Child- Homework Mastery	123	91
Unparalleled Solutions, Inc.	824	805
Wicker Park Learning Center	70	60
Total	50,204	44,223

The Impact of SES on the Achievement Gains of Students in Elementary School

The outcomes used to determine the impact of the SES program were ISAT reading and math achievement gains. Statistical modeling procedures were used to compare the achievement gains on the ISAT of SES participants to those of students eligible to receive SES tutoring that did not participate. Differences in the demographic characteristics and prior achievement levels of SES participants and non-participants were accounted for through statistical modeling procedures, to isolate the unique impact of the SES program on reading and math achievement.

The population of students used to evaluate the impact of the SES program included students in grades four through eight⁵, who were not English Language Learners (ELL)⁶, and were eligible for SES services (low-income students in poor performing schools). Only students that received 30 or more hours of SES tutoring were included in the analyses as SES participants.⁷ Appendices A and B summarize the sample included in these analyses.

Two basic general linear models were developed using the SAS 9.1 statistical software package: one predicting 2007 ISAT Reading Scale scores and one predicting 2007 ISAT Math Scale scores. Each model included the impacts of race, gender, IEP status, grade level, baseline achievement scale scores, baseline achievement performance levels⁸, and the interaction terms of race and gender, grade level and baseline achievement scale scores, grade level and baseline achievement performance levels, and grade level and IEP status. The inclusion of these interaction terms accounts for differences in the impact of prior achievement and IEP across grade levels and race across genders. These general models were then applied to the five analyses outlined below.

1. To test the overall impact of SES on reading and math achievement, SES participation was added to the models as a categorical variable, thereby allowing for a test of the unique impact of SES on student achievement gains. The achievement gains of students that received at least 30 hours of SES tutoring were compared to students eligible for SES that did not participate (See Appendices E and F for the results of these analyses).
2. To determine if subgroups of students received more of a benefit from participating in SES, the interaction terms of SES participation with gender, race, grade, baseline achievement performance levels, and disability status were added to the statistical models developed in step one (See Appendix G for the results).
3. To compare the impact of different SES providers to the population of students that were eligible for SES but did not receive services, SES participation was removed from the models in Step 1 and SES program provider was added (See Appendices H and I for the results of these analyses).
4. To compare the impact of the AIM High (CPS) tutoring program to non-district tutoring programs, the SES program provider variable was recoded so that all providers except AIM High were grouped together. Only SES participants were included in these analyses (See Appendix J for the results).
5. To demonstrate the size of the impact of the overall SES program, for subgroups of participants, and for different providers, two statistical models were built with the group of students that were eligible

⁵ The ISAT is only administered to students in grades three through eight so achievement gains can only be calculated for students in grades four through eight.

⁶ ELL students do not take the ISAT so are not included in these analyses.

⁷ To ensure that students received an adequate number of tutoring hours to demonstrate an effect of SES, only SES participants that received at least 30 hours of tutoring were included in the analyses. Thirty hours was chosen as the cutoff since it was the fewest number of hours that providers were approved to offer students.

⁸ Appendix M contains a breakdown of scale scores and corresponding performance levels broken down by grade.

for SES that did not receive tutoring, one predicting reading and one predicting math achievement. The resulting model parameter estimates (Appendices K and L) were used to establish a baseline for the expected achievement gains of students that did not receive SES. These parameters were then applied to SES participants, to compare the actual achievement of SES participants to their predicted achievement had they not received SES. Predicted ISAT gains were then calculated by subtracting 2006 ISAT scale scores from predicted 2007 scores. The size of the impact of SES is represented by the ratio of actual gains to predicted ISAT gains for each group of interest by using the equation:

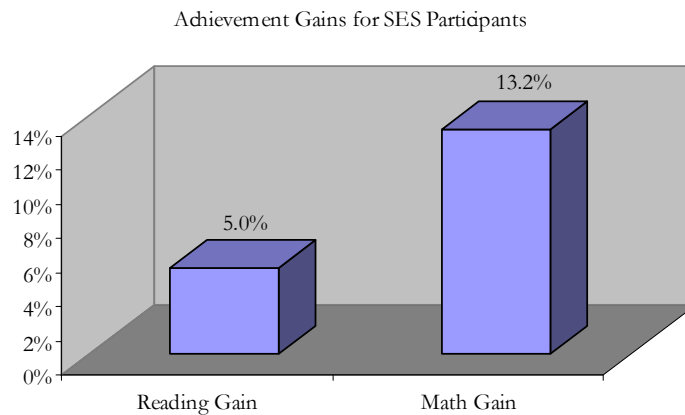
$$SES \text{ achievement gain size} = \frac{\bar{X}(2007 \text{ actual scale score} - 2006 \text{ actual scale score})}{\bar{X}(2007 \text{ predicted scale score} - 2006 \text{ scale score})}$$

Appendices C and D present the resulting achievement data used to calculate gains and z-scores (effect sizes) of the SES program for different subgroups.

The Overall Impact of SES on Reading and Math Achievement

After accounting for students’ demographic and prior achievement, SES participants demonstrated significantly greater gains in reading and math achievement than was expected had they not received SES tutoring ($p < .001$). For reading, SES participants were predicted to gain 10.2 reading scale score points, while their actual gain averaged 10.7 ($\sigma = 15.9$). This difference of 0.5 scale score points represents 5.0% greater reading achievement gains for SES participants than expected had they not received SES tutoring (Figure 4). For math achievement, SES participants were predicted to gain 13.6 math scale points, while their actual gains averaged 15.4 ($\sigma = 14.5$) points. This difference of 1.8 math scale score points represents 13.2% greater math achievement gains for SES participants than would be expected had they not received tutoring. Finally, although SES participants demonstrated significantly greater reading and math achievement gains, the size of the effect of the program on reading achievement was very small, with the difference of 0.5 reading scale score points only representing 0.03 standard deviations better performance. However, the difference of 1.8 math scale score points, representing 0.12 standard deviations better performance than expected, indicates that the SES program had a moderately sized impact on student math achievement.⁹

Figure 4



⁹ In this report, effect sizes less than .10 are considered small, between .10 and .20 are considered moderate, and above .20 are considered large. Most traditional classification schemas of effect sizes, such as Cohen (1988), would not classify the effect sizes presented in this report as significant. However, traditional effect size classification schemas are acontextual such that by applying them to measure achievement gains, entire school districts would typically be classified as having a small impact on student achievement. See “Bloom, H., Hill, C., Black, A., & Lipsey, M. (2006). *Effect Sizes in Education Research: What They Are, What They Mean, and Why They're Important*.” for a more involved discussion of the use of effect sizes in educational contexts.

The Impact of SES in Relation to the Number of Tutoring Hours Received

Students who received more SES tutoring typically demonstrated the greatest benefit. Students who received greater than 70 hours of tutoring demonstrated the largest difference between expected and actual math and reading achievement gains. SES students receiving greater than 70 hours of tutoring were predicted to gain 10.3 scale points in reading and 13.4 scale points in math. The actual gain for SES participants was 11.3 ($\sigma = 16.3$) scale points in reading and 16.5 ($\sigma = 15.3$) points in math. Thus, the 1.0 point difference in reading indicates that SES participants tutored for greater than 70 hours gained 9.4% more in reading than expected (Figure 5), and the 3.1 math scale point difference indicates they gained 23.3% more in math than expected (Figure 6). For students receiving more than 70 hours of tutoring, the size of the effect was small for reading and large for math, with the difference of 1.0 reading scale points representing 0.06 standard deviations and the difference of 3.1 math scale points representing 0.20 standard deviations. Finally, although there appears to be a direct relationship between the amount of SES tutoring received and student math achievement gains, in reading the relationship is less clear, with students receiving between 40 and 50 hours of tutoring demonstrating about the same sized achievement gain as would be expected had they not received SES tutoring.

Figure 5

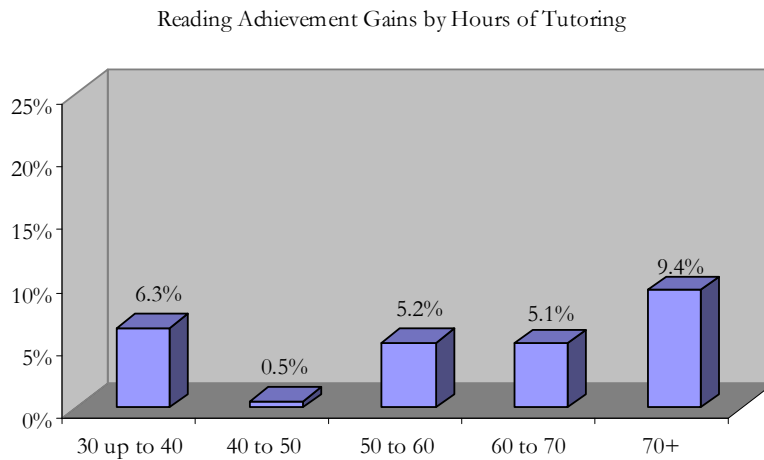
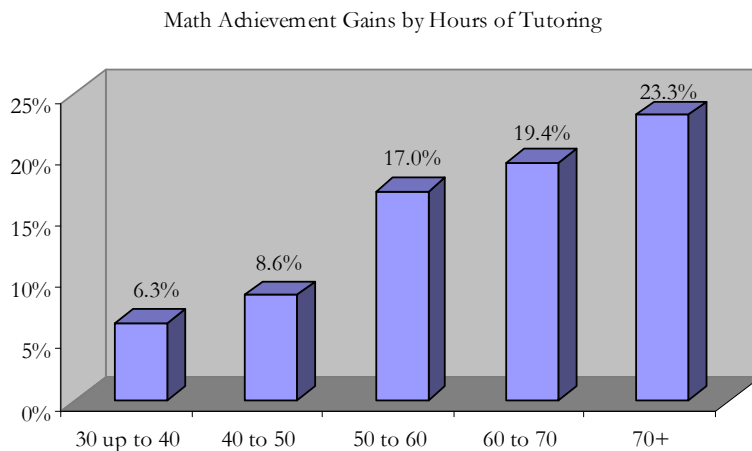


Figure 6

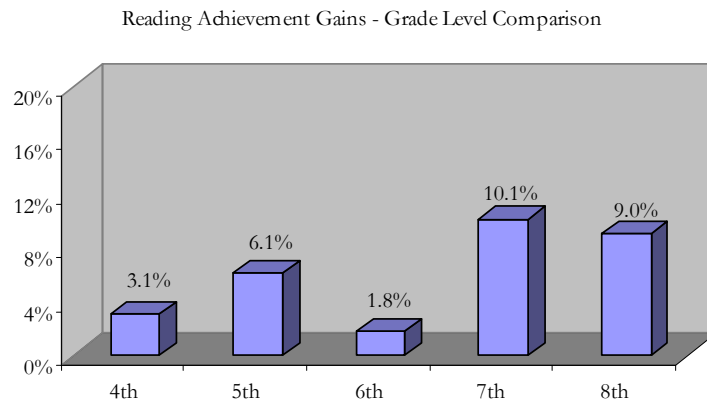


The Impact of SES in Relation to Grade Level

To test if students in different grades received a differential benefit from the SES program, the interaction terms of SES participation and grade level were included in the statistical models predicting reading and math (Appendix G). The results suggest that grade is a statistically significant factor in determining the impact of SES on math gains ($p = .0023$) but not reading gains ($p = .447$).

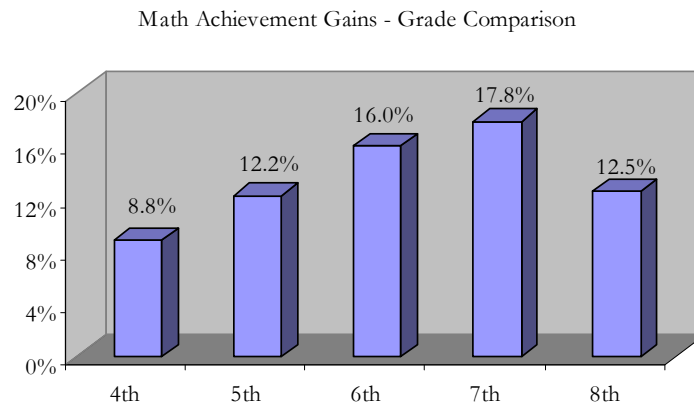
In reading, 7th and 8th grade SES participants were predicted to gain 6.6 and 11.8 scale points respectively. The actual gains for 7th and 8th grade SES participants were 7.3 ($\sigma = 14.8$) and 12.8 ($\sigma = 14.3$) points respectively. Although small, the 7th grade difference of 0.7 scale points represents a 10.1% greater than expected gain, while the larger 1.1 difference found for 8th grade participants represents a 9.0% difference (Figure 7). Although these differences may appear large, it is important to note that they are not statistically significant, which is likely a function of the small impact SES had on reading achievement.

Figure 7



In math, SES participants in 6th and 7th grade were found to have the greatest difference between actual and predicted gains. 6th and 7th grade participants were predicted to gain 15.8 and 10.4 scale points respectively, while their actual gains were 18.4 ($\sigma = 13.6$) and 12.3 ($\sigma = 13.3$). The 6th grade difference of 2.5 represents a 16.0% greater than expected gain, and the 7th grade difference of 1.9 represents a 17.8% greater than expected gain had they not received SES (Figure 8). Translated to effect sizes, the 6th grade difference represents 0.19 standard deviations and the 7th grade difference represents 0.14 standard deviations, indicating a moderate impact of SES on the math achievement gains of 6th and 7th grade participants (Appendix D).

Figure 8

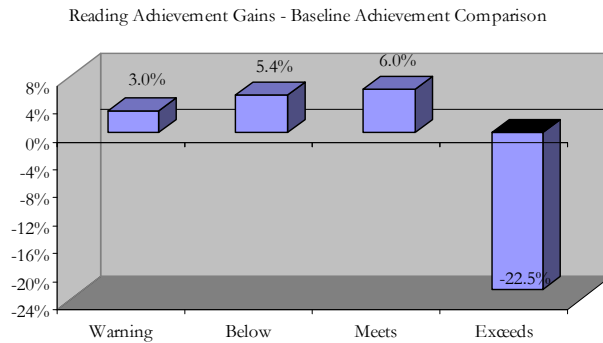


The Impact of SES in Relation Baseline Achievement Performance Levels

To test if students at different starting achievement levels received a greater benefit from the SES program, the interaction terms of SES participation and baseline ISAT achievement performance levels were included in the statistical models predicting reading and math gains (Appendix G). The results suggest that baseline performance level is not a statistically significant factor in determining the impact of SES on math ($p = .3269$) or reading gains ($p = .2706$).

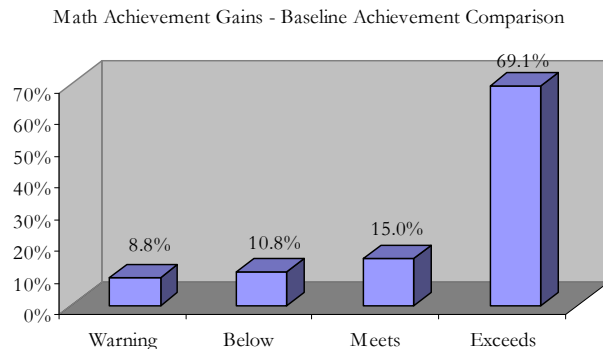
As the results of the modeling indicated, no significant difference was found between the effect of SES on students with differing baseline reading performance levels. However, some clarification of the results is necessary regarding students in the “exceeds expectations” group. The model predicted that SES participants in the “exceeds expectations” group would demonstrate a reduction in their achievement scores by 3.2 scale points. These students actually demonstrated a greater reduction of 3.9 ($\sigma = 16.5$) points suggesting that the lowering of these students’ scores was primarily a function of regression to the mean, and not due to programmatic effects.

Figure 9



Although the impact of SES was not found to differ across baseline math performance levels, there were some interesting trends in the results. SES participants in the meets and exceeds categories were predicted to gain 11.2 and 4.1 scale points respectively, while their actual gains were 12.9 ($\sigma = 14.1$) and 6.9 ($\sigma = 17.9$). The difference of 1.7 for students whose baseline achievement met expectations represents a 15.0% greater than expected gain, while the difference of 2.8 for students whose achievement exceeded expectations represents a 69.1% greater than expected gain had they not received SES (Figure 10). Both differences represent moderate effects of SES, with the difference for students in the meets expectations group representing 0.12 standard deviations, and the difference for students in the exceeds expectations group representing 0.16 standard deviations greater performance (Appendix D).

Figure 10



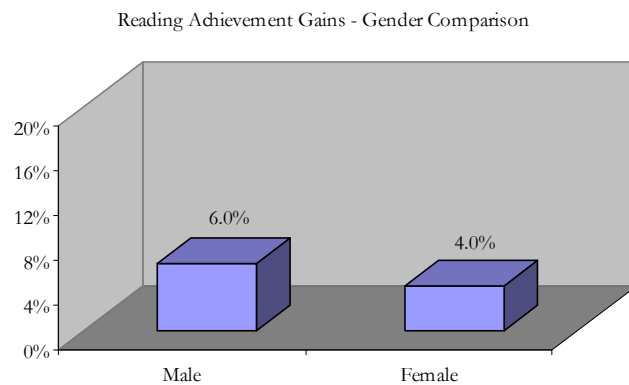
Generally, in both reading and math, the better a student’s baseline performance, the less they were predicted to gain. Thus, even though the relative size of the impact of SES remained consistent across baseline performance levels (Appendices C and D), the percentage differences presented in Figures 9 and 10 were higher for students whose baseline performance levels were better.

The Impact of SES in Relation to Gender

To test if gender is a relevant factor in predicting the impact of SES, the interaction term of SES participation and gender was included in the statistical models predicting reading and math gains (Appendix E). The results suggest that gender is not a statistically significant factor in determining the impact of SES on reading ($p = .713$) but is a significant factor in predicting the impact of SES on math gains ($p = .0304$).

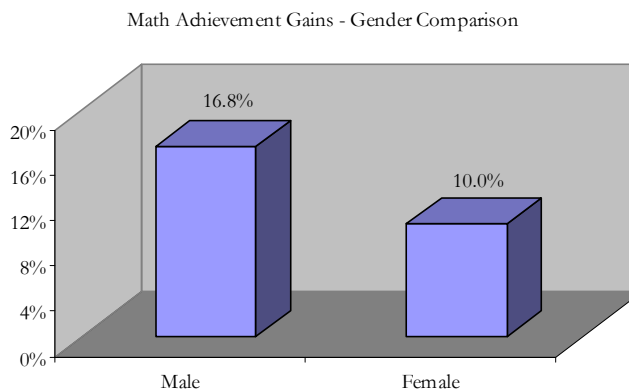
In reading, male and female SES participants were predicted to gain 10.5 and 9.9 scale points respectively, but actually gained 11.1 ($\sigma = 16.0$) and 10.3 ($\sigma = 15.8$) points (Appendix C). These numbers translate to a 6% greater than expected gain for male participants and a 4% greater gain for female participants (Figure 11). Translated to effect sizes, the SES program had a small impact on both male and female participants’ reading achievement gains (Appendix D).

Figure 11



In math, male SES participants demonstrated a greater benefit from SES. Male participants were predicted to gain 13.2 scale points, while their actual gains averaged 15.4 ($\sigma = 15.0$). The difference of 2.5 represents a 16.8% greater than expected gain had they not received SES (Figure 12). Translated to effect sizes, the SES program had a moderate impact on the math gains of both male and female participants (Appendix D).

Figure 12

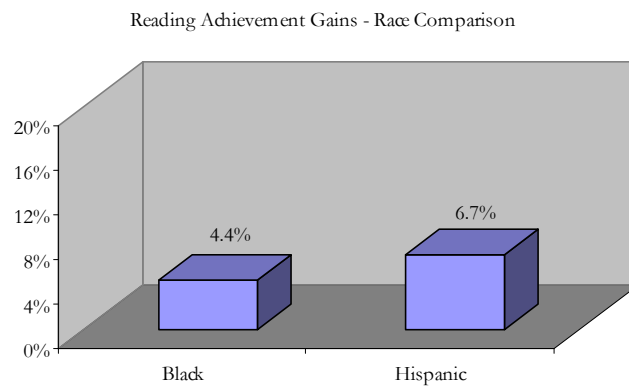


The Impact of SES in Relation to Race

To test if race is a relevant factor in predicting the impact of SES, the interaction term of SES participation and race was included in the statistical models predicting reading and math gains (Appendix E). The results suggest that race is not a statistically significant factor in determining the impact of SES on reading ($p = .2671$) nor math gains ($p = .0964$).

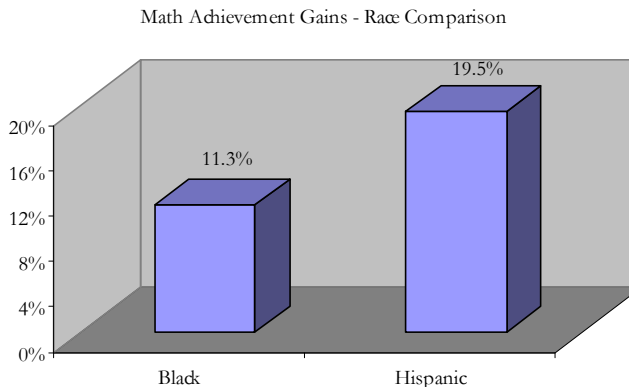
In reading, Hispanic and black SES participants were predicted to gain 11.2 and 9.9 scale points respectively, but actually gained 11.9 ($\sigma = 15.5$) and 10.4 ($\sigma = 16.0$) points. For Hispanic students, the difference of 0.7 scale points represents a 6.7% greater than expected gain, while for black students the difference of 0.5 scale points represents a 4.4% greater gain (Figure 13). Translated to effect sizes, the SES program had a small impact on the reading achievement of both Hispanic and black participants (Appendix C).

Figure 13¹⁰



In math, Hispanic and black participants were predicted to gain 13.7 and 13.6 scale points respectively, while their actual gains averaged 16.3 ($\sigma = 14.2$) and 15.2 ($\sigma = 14.6$). For Hispanic participants, the difference of 2.7 scale points represents a 19.5% greater than expected gain, and for black participants, the difference of 1.6 represents an 11.3% greater gain (Figure 14). Translated to effect sizes, the SES program had a moderate impact on the math achievement of both Hispanic and black participants (Appendix D).

Figure 14



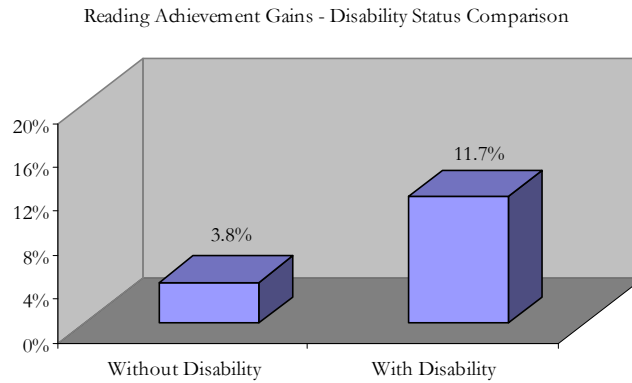
¹⁰ Other racial groups were not presented since the black and Hispanic groups account for 97% of all participants in the analyses.

The Impact of SES for Students with Disabilities

To test if SES participants with disabilities obtained a greater benefit from SES, the interaction term of SES participation and disability status was included in the statistical models predicting reading and math gains (Appendix E). The results suggest that disability status approaches significance in determining the impact of SES on both reading ($p = .069$) and math gains ($p = .0565$).

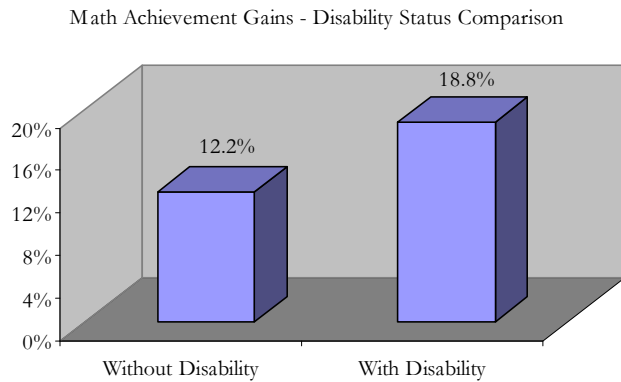
In reading, SES participants with and without disabilities were expected to gain 10.9 and 10.1 scale points respectively, but actually gained 12.2 ($\sigma = 16.8$) and 10.4 ($\sigma = 15.7$) points. The difference of 1.3 scale points gained by students with a disability represents an 11.7% greater than expected gain, while the difference of 0.3 points gained by students without a disability represents a 3.8% greater gain (Figure 15). Translated to effect sizes, SES had a small impact on the reading achievement gains of students with disabilities and a negligible impact on the reading gains of students without disabilities (Appendix C).

Figure 15



In math, SES participants with and without disabilities were expected to gain 13.9 and 13.6 scale points respectively, but actually gained 16.5 ($\sigma = 15.5$) and 15.3 ($\sigma = 14.4$) points. The difference of 2.6 scale points gained by students with a disability represents an 18.8% greater than expected gain, while the difference of 0.3 points gained by students without a disability represents a 12.2% greater gain (Figure 16). Translated to effect sizes, SES had a moderate impact on the reading achievement gains of both students with and without disabilities (Appendix D).

Figure 16



Analyses of SES Providers

In addition to testing the overall effectiveness of the SES program, the effectiveness of the different SES providers were evaluated across four main questions:

1. Which SES programs performed significantly better or worse than the group of similar students eligible for SES that did not receive tutoring?
2. In relation to students eligible for SES that did not receive tutoring, how much more or less reading and math achievement did students tutored by specific providers gain?
3. Did the AIM High (CPS) program perform as well or better than other non-district, private tutoring programs collectively?
4. How cost effective were the SES programs?

Comparison of the Reading Achievement Gains of Students Tutored by Different SES Programs

To determine which SES programs demonstrated a greater benefit to participants than was expected had their students not received SES, SES provider was added to statistical models predicting reading and math gains (Appendices F and G). The results suggest that students in several programs demonstrated higher reading and math achievement gains than the group of students that did not receive SES but were eligible.

In reading, students in the A+ Tutoring Service, Ltd., CS&C Inc.-Julex Learning, One-to-One Learning Center, Socratic Learning, Unparalleled Solutions, Inc., Catapult, Huntington Learning, and AIM High (CPS) programs all demonstrated significantly greater achievement gains than students eligible for SES that did not participate (Appendix H). The Failure Free Reading program was the only provider that demonstrated significantly lower student reading achievement gains.

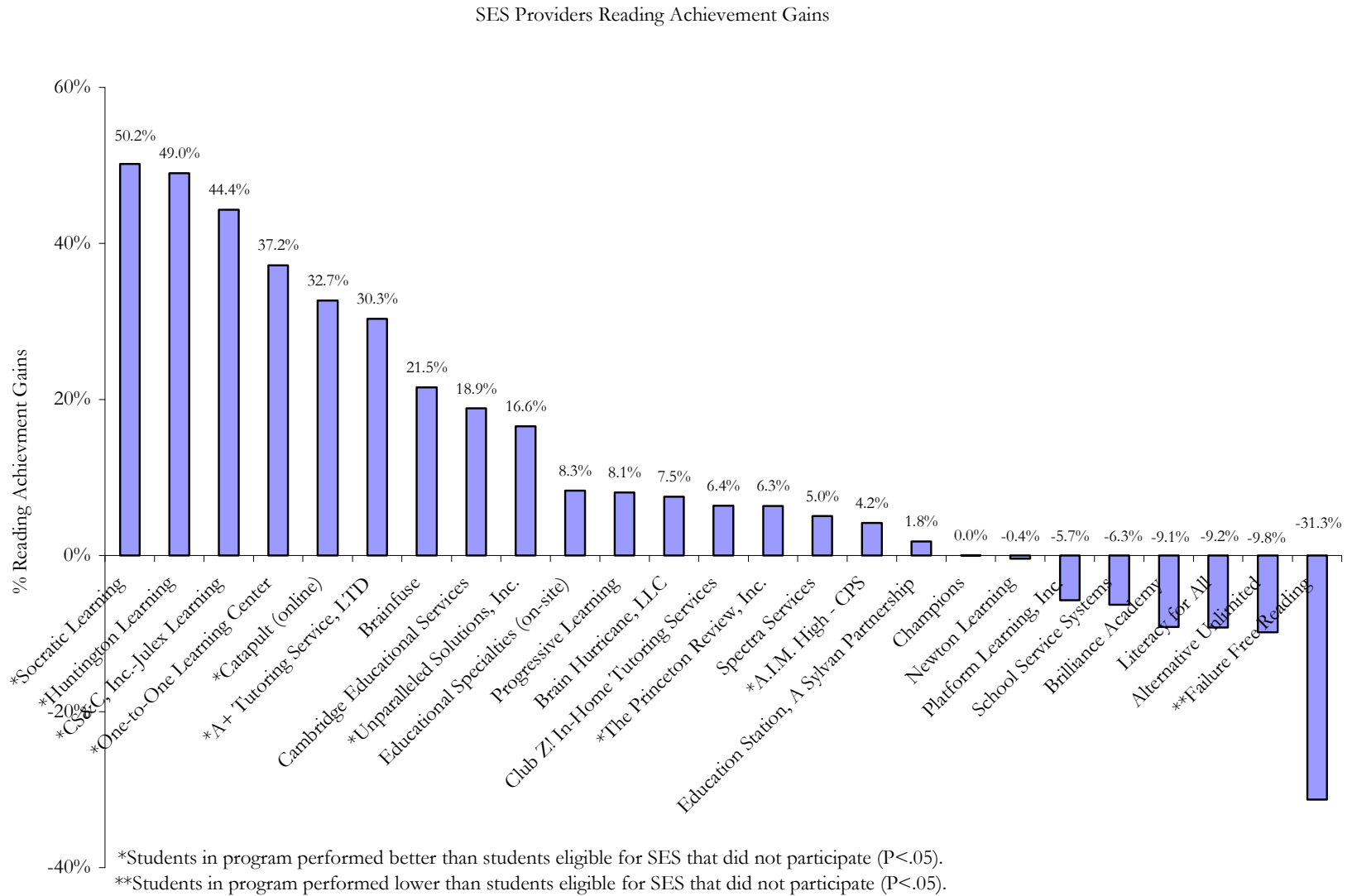
The magnitude of the difference in expected and actual reading achievement gains was also analyzed to determine which providers had the largest impact on student reading achievement gains. The results indicate that students in the Socratic Learning Program demonstrated the greatest difference in actual achievement gains (10.9, $\sigma = 17.9$) compared to expected (7.2). This difference of 3.6 scale points represents 50.2% greater achievement gains than expected had students in that program not received tutoring. Figure 17 presents the providers ordered by the ratio of actual to expected gains.

Further, the size of the impact each provider had on the reading achievement gains of participants were analyzed (Table 4). Based on the difference in actual and expected reading achievement gains, the A+ Tutoring Service, Ltd, CS&C Inc.-Julex Learning, Huntington Learning, One-to-One Learning Center, and Socratic Learning programs all demonstrated large impacts on the reading achievement gains of participants ($z > .20$).

Table 4 – Student Reading Gains Broken Down by SES Providers

	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
A+ Tutoring Service, LTD	10.26	13.37 (14.56)	3.11	30.3%	0.21	206
A.I.M. High - CPS	10.27	10.69 (15.87)	0.43	4.2%	0.03	3,703
Alternative Unlimited	10.62	9.58 (15.77)	-1.04	-9.8%	-0.07	43
Brain Hurricane, LLC	11.03	11.86 (17.86)	0.83	7.5%	0.05	73
Brainfuse	10.08	12.25 (14.80)	2.17	21.5%	0.15	51
Brilliance Academy	10.13	9.20 (16.69)	-0.92	-9.1%	-0.06	320
CS&C, Inc.-Julex Learning	11.74	16.94 (16.10)	5.21	44.4%	0.32	71
Cambridge Educational Services	10.11	12.01 (17.23)	1.91	18.9%	0.11	78
Catapult (online)	8.71	11.56 (15.01)	2.85	32.7%	0.19	284
Champions	11.12	11.12 (17.12)	0.00	0.0%	0.00	353
Club Z! In-Home Tutoring Services	10.82	11.51 (15.62)	0.69	6.4%	0.04	243
Education Station, A Sylvan Partnership	10.43	10.62 (15.97)	0.19	1.8%	0.01	994
Educational Specialties (on-site)	12.63	13.68 (15.33)	1.05	8.3%	0.07	47
Failure Free Reading	11.15	7.66 (18.85)	-3.49	-31.3%	-0.19	82
Huntington Learning	10.31	15.36 (16.36)	5.05	49.0%	0.31	55
Literacy for All	9.99	9.07 (15.37)	-0.92	-9.2%	-0.06	43
Newton Learning	10.57	10.53 (15.37)	-0.04	-0.4%	0.00	1,306
One-to-One Learning Center	10.05	13.79 (17.68)	3.74	37.2%	0.21	68
Platform Learning, Inc.	9.67	9.11 (16.76)	-0.55	-5.7%	-0.03	418
Progressive Learning	9.33	10.09 (15.51)	0.76	8.1%	0.05	721
School Service Systems	9.49	8.89 (15.26)	-0.60	-6.3%	-0.04	357
Socratic Learning	7.23	10.87 (17.89)	3.63	50.2%	0.20	105
Spectra Services	8.51	8.93 (17.63)	0.43	5.0%	0.02	46
The Princeton Review, Inc.	10.19	10.83 (15.06)	0.65	6.3%	0.04	699
Unparalleled Solutions, Inc.	10.01	11.66 (16.03)	1.66	16.6%	0.10	362

Figure 17

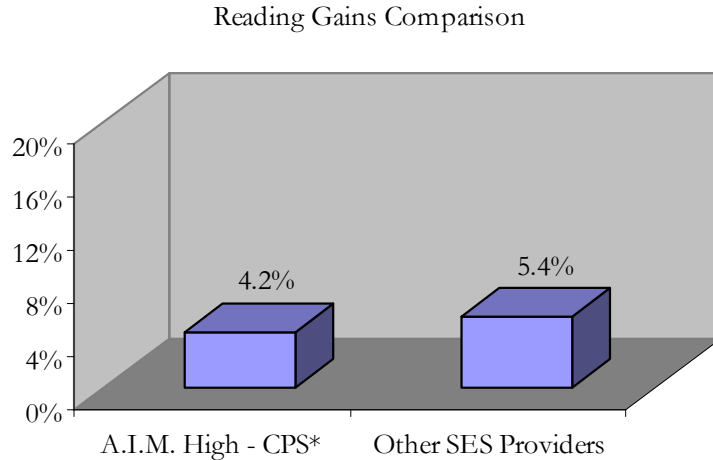


Finally, in addition to comparing the reading achievement gains of students tutored by different providers individually, students tutored by the district tutoring program AIM High were compared to the group of students tutored by other non-district providers. The results of this model (Appendix J) suggest that there was no statistical difference between the reading achievement gains of AIM High participants and those of students tutored by other, non-district providers taken as a group. Both groups experienced small, but higher than expected, reading gains (Table 5), with AIM High participants gaining 4.2% more than expected, while students tutored by other SES providers gained 5.4% more (Figure 18).

Table 5 - Student Reading Gains Comparing A.I.M. High CPS Program to all other SES Providers

	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
A.I.M. High - CPS	10.27	10.69 (15.87)	0.43	4.2%	0.03	3,703
Other SES Providers	10.14	10.69 (15.84)	0.55	5.4%	0.03	7,232

Figure 18



*The impact of SES on reading gains did not vary between AIM High and other SES providers ($p > .05$)

Comparison of the Math Achievement Gains of Students Tutored by Different SES Programs

In math, Students in the A+ Tutoring Service, Ltd., Unparalleled Solutions, Inc., The Princeton Review, Inc., Progressive Learning, Inc., School Service Systems, Catapult, and AIM High (CPS) programs all demonstrated significantly greater achievement gains than students eligible for SES that did not participate (Appendix G). No providers demonstrated significantly lower math achievement gains.

The size of the difference in expected and actual math achievement gains was analyzed to determine which providers had the largest impact on student math achievement gains. The results indicate that students in the A+ Tutoring Services Program demonstrated the greatest difference in actual achievement gains (18.15, $\sigma = 15.77$) compared to expected (13.18). This difference of 4.96 scale points represents 37.6% greater math achievement gains than expected had students in that program not received tutoring. Figure 18 presents all the providers ordered by the ratio of actual to expected gains.

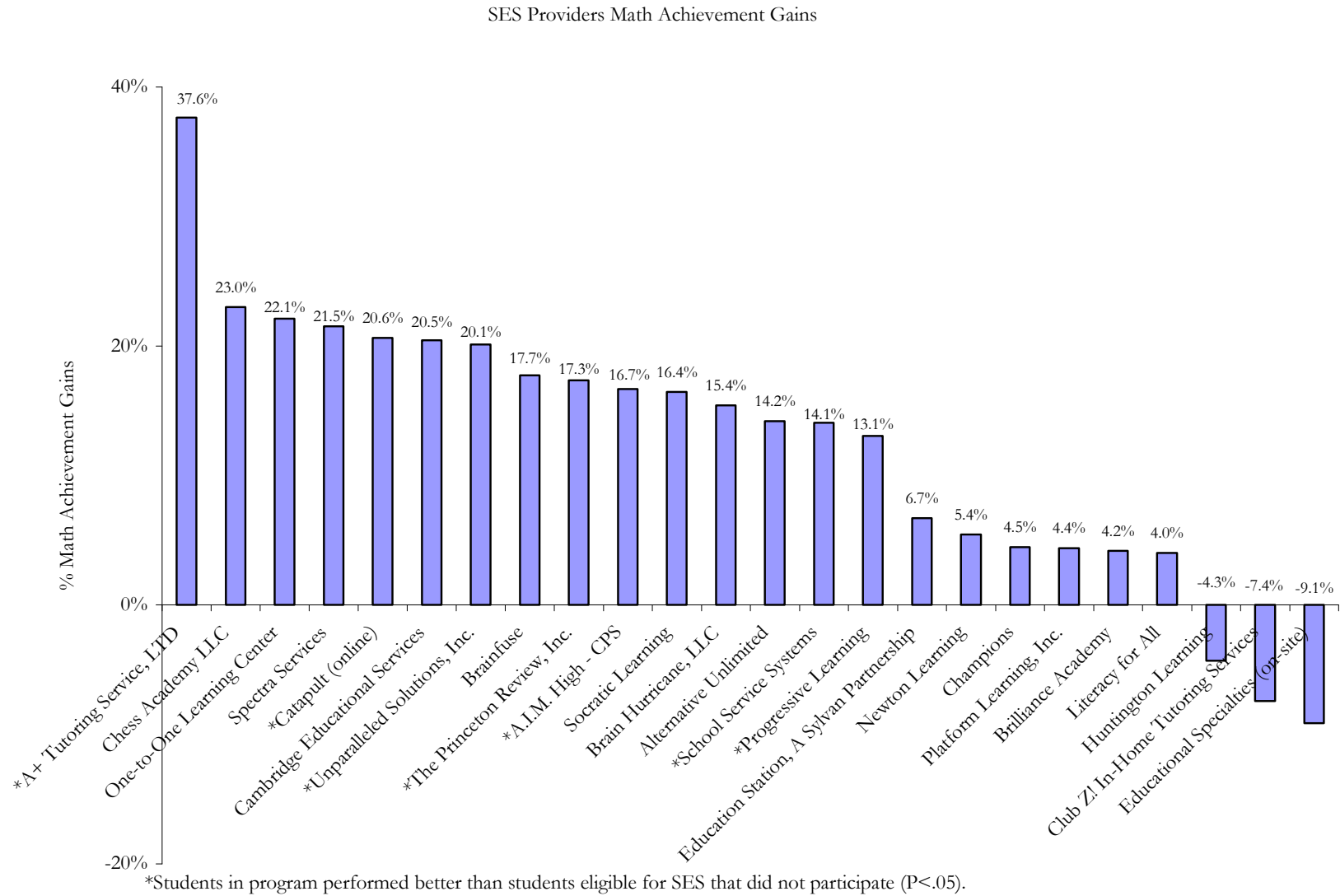
Further, the size of the impact each provider had on the math achievement gains of participants were analyzed (Table 5). Based on the difference in actual and expected reading achievement gains, the A+

Tutoring Service, Ltd, Spectra Services, and Unparalleled Solutions, Inc. programs all demonstrated large impacts on the math achievement gains of participants ($z > .20$).

Table 6 – Student Math Gains Broken Down by SES Providers

	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
A+ Tutoring Service, LTD	13.18	18.15 (15.77)	4.96	37.6%	0.31	204
A.I.M. High - CPS	13.68	15.96 (14.82)	2.28	16.7%	0.15	3,701
Alternative Unlimited	14.15	16.16 (14.72)	2.01	14.2%	0.14	43
Brain Hurricane, LLC	13.06	15.07 (13.93)	2.01	15.4%	0.14	73
Brainfuse	13.07	15.39 (12.47)	2.32	17.7%	0.19	51
Brilliance Academy	13.98	14.57 (15.56)	0.58	4.2%	0.04	320
Cambridge Educational Services	12.21	14.70 (15.96)	2.50	20.5%	0.16	77
Catapult	13.44	16.21 (14.28)	2.77	20.6%	0.19	285
Champions	14.30	14.93 (14.53)	0.64	4.5%	0.04	352
Chess Academy LLC	10.95	13.47 (13.40)	2.52	23.0%	0.19	75
Club Z! In-Home Tutoring Services	14.01	12.97 (15.12)	-1.04	-7.4%	-0.07	244
Education Station, A Sylvan Partnership	15.29	16.31 (11.96)	1.02	6.7%	0.09	42
Educational Specialties	13.98	12.70 (12.35)	-1.28	-9.1%	-0.10	47
Huntington Learning	12.22	11.69 (13.03)	-0.53	-4.3%	-0.04	55
Literacy for All	13.26	13.80 (14.50)	0.53	4.0%	0.04	44
Newton Learning	13.98	14.74 (13.38)	0.76	5.4%	0.06	1,304
One-to-One Learning Center	13.22	16.15 (14.22)	2.92	22.1%	0.21	68
Platform Learning, Inc.	13.68	14.28 (14.98)	0.60	4.4%	0.04	421
Progressive Learning	13.06	14.77 (14.71)	1.71	13.1%	0.12	721
School Service Systems	13.48	15.37 (15.27)	1.89	14.1%	0.12	357
Socratic Learning	12.35	14.38 (13.41)	2.03	16.4%	0.15	103
Spectra Services	13.06	15.87 (11.48)	2.81	21.5%	0.25	46
The Princeton Review, Inc.	13.95	16.37 (13.93)	2.42	17.3%	0.17	695
Unparalleled Solutions, Inc.	13.27	15.94 (13.97)	2.67	20.1%	0.19	363

Figure 19

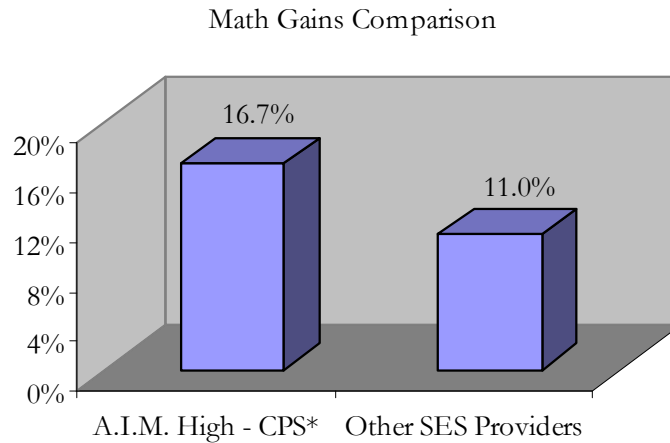


Finally, in addition to comparing the math achievement gains of students tutored by different providers individually, students tutored by the district tutoring program, AIM High, were compared to students tutored by non-district providers collectively. The results of this model (Appendix J) suggest that AIM High participants demonstrated greater math achievement gains than the group of students tutored by non-district providers ($p < .01$). Although, non-district SES providers still had a significant impact on the math achievement of participants, AIM High participants gained 2.3 scale score points (16.7%) more than expected while students tutored by other providers gained only 1.5 scale score points (11.0%) more (Figure 20). Translated to effect sizes, both groups of providers demonstrated a moderate impact on the math gains of participants ($z = 0.15$ for AIM High and $z = 0.11$ for other SES providers) (Table 7).

Table 7 – Student Math Gains Broken Down by SES Providers

	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
A.I.M. High - CPS	13.68	15.96 (14.82)	2.28	16.7%	0.15	3,701
Other SES Providers	13.61	15.11 (14.28)	1.50	11.0%	0.11	6,189

Figure 20



*Students in AIM High demonstrated greater math gains than students tutored by other SES providers ($p < .01$)

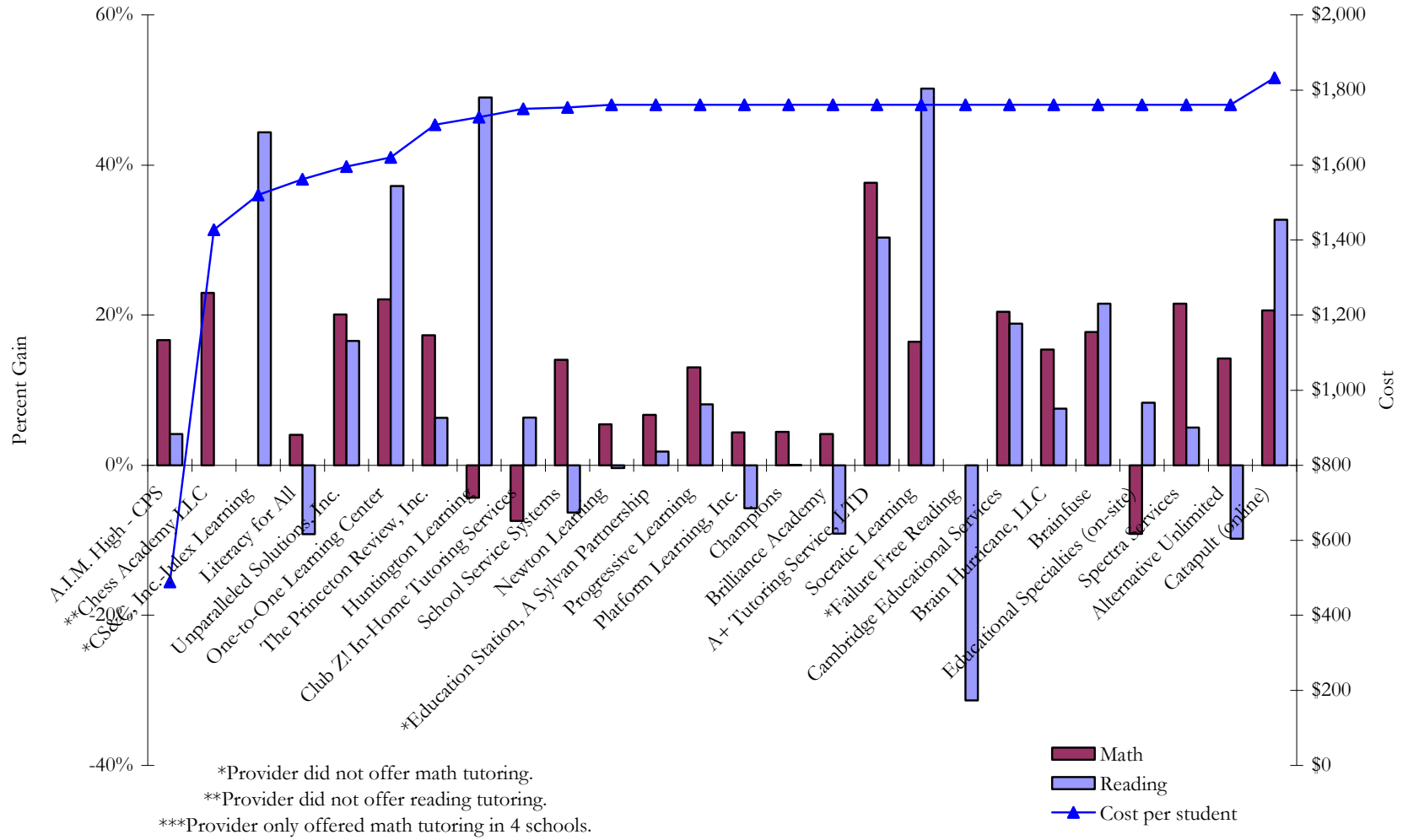
The Cost Effectiveness of the SES programs

In addition to exploring the success of impact of SES on students tutored by the various providers, the cost of providers was also considered relevant for determining the effectiveness of SES tutoring programs. Table 2 (page 6) presents the cost per student approved by the state for each provider. In Figure 19, these costs are graphed along with the ratios of actual achievement gains to expected achievement gains students in each tutoring program demonstrated. Tutoring providers are ordered from left to right, least to most expensive.

Based on the results presented in Figure 19, it is not clear that the more expensive SES providers were more beneficial to students. The success of students in the AIM High program, by far the least expensive SES provider at \$489 per student, was comparable to that of students in other more expensive programs. In fact, students tutored by the three least expensive providers, AIM High, Chess Academy LLC, and CS&C Inc. Julex Learning, demonstrated some of the greatest gains in reading and math. In addition, the lack of a correlation between program cost and its impact on student reading ($r = .07$, $p = .738$) and math achievement ($r = -.07$, $p = .740$) further demonstrates that higher costs do not translate into greater student benefit.

Figure 21

SES Providers Math and Reading Achievement Gains Ordered by Program Cost per Student



Summary and Conclusions

After its fourth year of implementation in the Chicago Public Schools, the SES tutoring program continues to demonstrate a significant impact on the reading and math achievement gains of elementary students. Students in the SES program demonstrated significantly greater gains in both reading and math achievement compared to other low-income students attending the same schools that did not receive SES tutoring. SES participants gained 5% more in reading and 13% more in math than expected had they not received tutoring.

Although the SES program was found to positively impact students in general, certain groups of students demonstrated a greater benefit from SES participation.

- Students with disabilities that participated in SES may receive a greater benefit on both math and reading achievement compared to SES participants without disabilities.
- SES participants in 6th and 7th grades demonstrated a greater benefit from SES on math achievement.
- Male participants demonstrated a greater benefit from SES on their math achievement than did female students.

Among the SES providers, students in the A+ Tutoring Service, Ltd., CS&C Inc.-Julex Learning, One-to-One Learning Center, Socratic Learning, Unparalleled Solutions, Inc., Catapult, Huntington Learning, and AIM High (CPS) programs all demonstrated significantly greater reading achievement gains than students eligible for SES that did not participate.

Students in the A+ Tutoring Service, Ltd., Unparalleled Solutions, Inc., The Princeton Review, Inc., Progressive Learning, Inc., School Service Systems, Catapult, and AIM High (CPS) programs all demonstrated significantly greater math achievement gains than students eligible for SES that did not participate. No providers demonstrated significantly lower math achievement gains compared to students eligible for SES that did not participate.

Although there was no significant difference between the reading achievement gains demonstrated by AIM High students and students in other, private tutoring programs, AIM High participants demonstrated significantly greater math achievement gains than did students tutored in other SES programs collectively.

The cost of tutoring programs did not correlate with greater student achievement gains, suggesting that more expensive programs are not more effective.

AIM High was one of only four programs, along with A+ Tutoring Service, Ltd., Unparalleled Solutions, Inc., and Catapult, that demonstrated a significant impact on both reading and math achievement gains of students.

There are a few noteworthy caveats to these findings. Although the SES program demonstrated a positive significant impact on the achievement of students, little is known about the actual implementation of SES and how characteristics of programs relate to program impact. Further evaluation work, documenting the relationships between aspects of SES programs and impact, is therefore warranted. Also, these findings represent outcomes for a small percentage of all SES participants. Of the over 44,000 SES participants, little more than 10,000 students in grades four through eight who were not English Language Learners were included in these analyses. Therefore, additional evaluation work of the impact of SES in earlier grades, later grades, and with ELL students would provide for a more complete picture of the value of SES in the Chicago Public Schools.

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Appendix A

Sample of students included in General Linear Models

	Math	Reading
Eligible but did not receive SES	42,654	41,861
SES Participants	9,891	10,935

Breakdown of sample included in residual score analyses

	Math	Reading
Gender		
<i>Male</i>	4,682	5,173
<i>Female</i>	5,208	5,761
Race/Ethnicity		
<i>Black</i>	7,658	8,580
<i>Hispanic</i>	1,980	2,090
Disability Status		
<i>With a Disability</i>	1,409	1,574
<i>W/ out Disability</i>	8,481	9,360
Prior Achievement Level		
<i>Warning</i>	551	523
<i>Below</i>	3,977	5,568
<i>Meets</i>	4,867	4,322
<i>Exceeds</i>	495	521
Grade Level		
4 th	2,293	2,600
5 th	2,135	2,370
6 th	2,157	2,378
7 th	1,750	1,907
8 th	1,555	1,679
Hours of Tutoring		
30 up to 40	2,990	3,259
40 to 50	2,089	2,430
50 to 60	2,081	2,458
60 to 70	1,358	1,410
70+	1,372	1,377

Appendix B

Sample Included in GLM Comparing Providers to Group of Eligible Non-participating Students

	Reading	Math
A.I.M. High - CPS	3,703	3,701
Newton Learning	1,306	1,304
*Education Station, A Sylvan Partnership	994	42
Progressive Learning	721	721
The Princeton Review, Inc.	699	695
Platform Learning, Inc.	418	421
Unparalleled Solutions, Inc.	362	363
School Service Systems	357	357
Champions	353	352
Brilliance Academy	320	320
Catapult (online)	284	285
Club Z! In-Home Tutoring Services	243	244
A+ Tutoring Service, LTD	206	204
Socratic Learning	105	103
**Failure Free Reading	82	
Cambridge Educational Services	78	77
***Chess Academy LLC		75
Brain Hurricane, LLC	73	73
**CS&C, Inc.-Julex Learning	71	
One-to-One Learning Center	68	68
Huntington Learning	55	55
Brainfuse	51	51
Educational Specialties (on-site)	47	47
Spectra Services	46	46
Alternative Unlimited	43	43
Literacy for All	43	44
Total	10,935	9,891

*Education Station only provided math tutoring to 3 schools.

**Provider did not tutor students in math.

***Provider did not tutor students in reading.

Sample Included in Models Comparing AIM High Program to other Providers

	Reading	Math
A.I.M. High - CPS	3,703	3,701
Other SES providers	7,232	6,190

Appendix C

Reading Gains for Subgroups						
	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
Overall Reading	10.2	10.7(15.9)	0.51	5.0%	0.03	10934
Race/Ethnicity						
<i>Black</i>	9.9	10.4(16.0)	0.44	4.4%	0.03	8580
<i>Hispanic</i>	11.2	11.9(15.5)	0.74	6.7%	0.05	2090
Gender						
<i>Male</i>	10.5	11.1(16.0)	0.63	6.0%	0.04	5174
<i>Female</i>	9.9	10.3(15.8)	0.40	4.0%	0.03	5761
Prior Achievement Level						
<i>Warning</i>	24.0	24.7(14.8)	0.71	3.0%	0.05	523
<i>Below</i>	13.4	14.1(14.8)	0.72	5.4%	0.05	5569
<i>Meets</i>	6.0	6.3(14.6)	0.36	6.0%	0.02	4322
<i>Exceeds</i>	-3.2	-3.9(16.5)	-0.72	-22.5%	-0.04	521
Disability Status						
<i>With a Disability</i>	10.9	12.2(16.8)	1.28	11.7%	0.08	1574
<i>W/out Disability</i>	10.1	10.4(15.7)	0.38	3.8%	0.02	9360
Grade Level						
4 th	10.8	11.1(17.4)	0.33	3.1%	0.02	2600
5 th	7.2	7.6(15.7)	0.44	6.1%	0.03	2371
6 th	14.3	14.5(15.1)	0.26	1.8%	0.02	2378
7 th	6.6	7.2(14.8)	0.67	10.1%	0.05	1907
8 th	11.8	12.8(14.3)	1.06	9.0%	0.07	1679

Appendix D

Math Gains for Subgroups

	Predicted Gain	Actual Gain (σ)	Gain Difference	Percent Gain	Z-Score	n
Overall Math	13.6	15.4(14.5)	1.79	13.2%	0.12	9891
Race/Ethnicity						
<i>Black</i>	13.6	15.2(14.6)	1.54	11.3%	0.11	7658
<i>Hispanic</i>	13.7	16.3(14.2)	2.67	19.5%	0.19	1980
Gender						
<i>Male</i>	13.2	15.4(15.0)	2.22	16.8%	0.15	4683
<i>Female</i>	14.0	15.4(14.1)	1.41	10.0%	0.10	5208
Prior Achievement Level						
<i>Warning</i>	26.0	28.2(14.1)	2.28	8.8%	0.16	551
<i>Below</i>	16.1	17.8(13.0)	1.74	10.8%	0.13	3978
<i>Meets</i>	11.2	12.9(14.0)	1.68	15.0%	0.12	4867
<i>Exceeds</i>	4.1	6.8(17.9)	2.80	69.1%	0.16	495
Disability Status						
<i>With a Disability</i>	13.9	16.5(15.5)	2.60	18.8%	0.17	1409
<i>W/out Disability</i>	13.6	15.3(14.4)	1.66	12.2%	0.12	8481
Grade Level						
4 th	13.9	15.1(15.9)	1.22	8.8%	0.08	2293
5 th	11.2	12.5(14.5)	1.36	12.2%	0.09	2136
6 th	15.8	18.3(13.6)	2.53	16.0%	0.19	2157
7 th	10.4	12.3(13.3)	1.85	17.8%	0.14	1750
8 th	17.2	19.4(13.3)	2.15	12.5%	0.16	1555

Appendix E

Analysis 1

Results of GLM predicting 2007 ISAT Reading scores

Parameter	Estimate	Standard Error	T-value	Pr
Intercept	77.74	3.38	23.02	<.0001
Gender	-0.04	0.90	-0.04	0.9658
With Disability	-11.23	0.41	-27.19	<.0001
2006 Reading Achievement	0.69	0.01	59.34	<.0001
4th Grade	2.36	4.94	0.48	0.6325
5th Grade	-4.17	4.70	-0.89	0.3749
6th Grade	12.44	4.38	2.84	0.0045
7th Grade	-12.87	4.64	-2.77	0.0056
4th Grade*Disability	5.52	0.65	8.51	<.0001
5th Grade*Disability	3.16	0.63	5.04	<.0001
6th Grade*Disability	4.08	0.61	6.7	<.0001
7th Grade*Disability	3.25	0.58	5.58	<.0001
2006 Reading Performance - Warning	5.63	1.88	3	0.0027
2006 Reading Performance - Below	8.09	1.06	7.65	<.0001
2006 Reading Performance - Meets	7.47	0.83	8.96	<.0001
American Indian	4.27	6.20	0.69	0.4913
Asian	2.29	1.74	1.31	0.189
Black	-2.89	0.63	-4.6	<.0001
Hispanic	0.32	0.65	0.5	0.6183
White	1.85	0.99	1.88	0.0601
Female*American Indian	-6.00	7.03	-0.85	0.3938
Female*Asian	4.89	2.44	2	0.0452
Female*Black	0.62	0.91	0.68	0.4935
Female*Hispanic	-0.05	0.94	-0.06	0.9539
Female*White	-1.50	1.46	-1.03	0.3048
2006 Reading Achievement * 4th grade	-0.03	0.02	-1.8	0.0721
2006 Reading Achievement * 5th grade	0.00	0.02	-0.12	0.9033
2006 Reading Achievement * 6th grade	-0.05	0.02	-2.96	0.003
2006 Reading Achievement * 7th grade	0.06	0.02	3.55	0.0004
Fourth Grade*2006 Reading Performance - Warning	-7.51	2.44	-3.07	0.0021
Fourth Grade*2006 Reading Placement - Below	-12.15	1.55	-7.81	<.0001
Fourth Grade*2006 Reading Performance - Meets	-8.75	1.16	-7.53	<.0001
Fifth Grade*2006 Reading Performance - Warning	-3.49	2.42	-1.44	0.1497
Fifth Grade*2006 Reading Performance - Below	-10.69	1.46	-7.31	<.0001
Fifth Grade*2006 Reading Performance - Meets	-7.92	1.10	-7.21	<.0001
Sixth Grade*2006 Reading Performance - Warning	-3.25	2.35	-1.38	0.1666
Sixth Grade*2006 Reading Performance - Below	-8.81	1.39	-6.32	<.0001
Sixth Grade*2006 Reading Performance - Meets	-7.43	1.08	-6.85	<.0001
Seventh Grade*2006 Reading Performance-Warning	4.73	2.65	1.79	0.0742
Seventh Grade*2006 Reading Performance - Below	-9.47	1.40	-6.75	<.0001
Seventh Grade*2006 Reading Performance - Meets	-7.97	1.07	-7.44	<.0001
Eligible Non-Participants	-0.58	0.15	-3.79	0.0002

Total R-Square = .746

Appendix F

Analysis 1

Results of GLM predicting 2007 ISAT Math scores

Parameter	Estimate	Standard Error	T-value	Pr
Intercept	86.16	3.57	24.1	<.0001
Gender	0.45	0.86	0.52	0.6022
With Disability	-6.59	0.38	-17.33	<.0001
2006 Math Achievement	0.74	0.01	63.04	<.0001
4th Grade	-0.47	4.84	-0.1	0.9231
5th Grade	-28.49	4.90	-5.81	<.0001
6th Grade	-22.06	4.81	-4.59	<.0001
7th Grade	-36.67	4.76	-7.7	<.0001
2006 Math Performance - Warning	1.84	1.37	1.35	0.1783
2006 Math Performance - Below	-5.11	1.07	-4.78	<.0001
2006 Math Performance - Meets	-4.55	0.83	-5.5	<.0001
American Indian	-6.06	5.87	-1.03	0.3017
Asian	3.36	1.65	2.03	0.042
Black	-2.08	0.60	-3.49	0.0005
Hispanic	0.64	0.61	1.05	0.2948
White	1.79	0.60	2.99	0.0028
4th Grade*Disability	2.60	0.58	4.49	<.0001
5th Grade*Disability	-0.12	0.55	-0.22	0.8278
6th Grade*Disability	-0.08	0.53	-0.15	0.877
7th Grade*Disability	0.79	0.94	0.84	0.3995
Female*American Indian	6.61	6.66	0.99	0.3214
Female*Asian	4.25	2.33	1.82	0.0686
Female*Black	0.25	0.87	0.29	0.7742
Female*Hispanic	-0.35	0.89	-0.4	0.6926
Female*White	-1.84	1.39	-1.32	0.1854
2006 Math Achievement * 4th grade	-0.08	0.02	-4.38	<.0001
2006 Math Achievement * 5th grade	0.07	0.02	4.15	<.0001
2006 Math Achievement * 6th grade	0.05	0.02	2.8	0.0052
2006 Math Achievement * 7th grade	0.11	0.02	6.61	<.0001
Fourth Grade*2006 Math Performance - Warning	-4.60	1.89	-2.43	0.015
Fourth Grade*2006 Math Performance - Below	0.34	1.46	0.23	0.8142
Fourth Grade*2006 Math Performance - Meets	1.43	1.06	1.35	0.1767
Fifth Grade*2006 Math Performance - Warning	0.94	1.99	0.47	0.6385
Fifth Grade*2006 Math Performance - Below	0.41	1.55	0.26	0.7922
Fifth Grade*2006 Math Performance - Meets	-2.33	1.17	-1.99	0.0461
Sixth Grade*2006 Math Performance - Warning	6.79	2.19	3.11	0.0019
Sixth Grade*2006 Math Performance - Below	4.62	1.70	2.71	0.0067
Sixth Grade*2006 Math Performance - Meets	6.55	1.39	4.72	<.0001
Seventh Grade*2006 Math Performance - Warning	8.37	2.02	4.15	<.0001
Seventh Grade*2006 Math Performance - Below	3.98	1.51	2.64	0.0084
Seventh Grade*2006 Math Performance - Meets	3.39	1.18	2.87	0.0041
Eligible Non-Participants	-1.80	0.15	-12.05	<.0001

Total R-Square = .788

Appendix G

Analysis 2

Results of GLM including interactions with SES participation - Reading

Interactions	DF	Type III SS	Mean Square	F Value	Pr
Gender * SES participation	1	25.72	25.72	0.14	0.713
Disability * SES participation	1	628.80	628.80	3.31	0.069
Race * SES participation	5	1221.41	244.28	1.28	0.2671
Grade * SES participation	4	704.89	176.22	0.93	0.447
2006 Reading Achievement Performance * SES participation	3	744.71	248.24	1.31	0.2706

Total R-Square = .746

Results of GLM including interactions with SES participation - Math

Interactions	DF	Type III SS	Mean Square	F Value	Pr
Gender * SES participation	1	799.28	799.28	4.69	0.0304
Race * SES participation	5	1591.96	318.39	1.87	0.0964
Disability * SES participation	1	620.38	620.38	3.64	0.0565
Grade * SES participation	4	2830.39	707.60	4.15	0.0023
2006 Math Achievement Performance * SES participation	3	588.83	196.28	1.15	0.3269

Total R-Square = .788

Appendix H

Analysis 3

Results of GLM comparing ISAT reading of SES providers with eligible non-participant group

Provider	Estimate	Standard Error	T Value	Pr
*A+ Tutoring Service, LTD	3.37	0.98	3.44	0.0006
*A.I.M. High - CPS	0.47	0.24	1.96	0.0499
Alternative Unlimited	-1.01	2.10	-0.48	0.6307
Brain Hurricane, LLC	0.84	1.63	0.51	0.6069
Brainfuse	2.58	1.95	1.32	0.186
Brilliance Academy	-0.72	0.79	-0.91	0.3608
*CS&C, Inc.-Julex Learning	4.51	1.80	2.51	0.012
Cambridge Educational Services	2.07	1.57	1.32	0.1882
*Catapult (online)	3.03	0.83	3.66	0.0003
Champions	0.02	0.75	0.03	0.9751
Club Z! In-Home Tutoring Services	0.71	0.90	0.80	0.4264
Education Station, A Sylvan Partnership	0.29	0.45	0.63	0.5257
Educational Specialties (on-site)	0.47	2.03	0.23	0.8157
**Failure Free Reading	-3.48	1.52	-2.28	0.0224
*Huntington Learning	5.07	1.86	2.72	0.0065
Literacy for All	-0.55	2.13	-0.26	0.7969
Newton Learning	0.07	0.40	0.17	0.8681
*One-to-One Learning Center	3.80	1.69	2.25	0.0243
Orion's Mind	-0.65	2.88	-0.23	0.821
Platform Learning, Inc.	-0.60	0.69	-0.88	0.3782
Progressive Learning	0.82	0.53	1.55	0.1214
School Service Systems	-0.54	0.73	-0.73	0.4632
*Socratic Learning	3.65	1.35	2.71	0.0068
Spectra Services	0.47	2.03	0.23	0.8178
The Princeton Review, Inc.	0.70	0.56	1.25	0.2121
*Unparalleled Solutions, Inc.	1.68	0.73	2.31	0.0208
*A+ Tutoring Service, LTD	3.37	0.98	3.44	0.0006
Eligible Non-SES Participants				

*Programs performed better than group of students that were eligible but did not participate in SES (P<.05).

**Programs performed worse than group of students that were eligible but did not participate in SES (P<.05).

Appendix I

Analysis 3

Results of GLM comparing ISAT math of SES providers with eligible non-participant group

Provider	Estimate	Standard Error	T Value	Pr
*A+ Tutoring Service, LTD	5.08	0.93	5.45	<.0001
*A.I.M. High - CPS	2.26	0.23	9.91	<.0001
Alternative Unlimited	2.05	1.99	1.03	0.3027
Brain Hurricane, LLC	1.83	1.54	1.19	0.2342
Brainfuse	2.33	1.85	1.26	0.2084
Brilliance Academy	0.74	0.75	0.99	0.3199
Cambridge Educational Services	2.80	1.50	1.86	0.0623
*Catapult (online)	2.99	0.78	3.81	0.0001
Champions	0.63	0.71	0.89	0.3726
Chess Academy LLC	2.10	1.56	1.34	0.1795
Club Z! In-Home Tutoring Services	-0.96	0.85	-1.13	0.257
Education Station, A Sylvan Partnership	1.58	2.15	0.73	0.4631
Educational Specialties (on-site)	-1.77	1.93	-0.92	0.3593
Huntington Learning	-0.54	1.76	-0.31	0.7601
Literacy for All	0.04	1.99	0.02	0.9837
Newton Learning	0.66	0.37	1.76	0.0784
One-to-One Learning Center	3.00	1.60	1.88	0.0603
Orion's Mind	-2.20	2.73	-0.81	0.4197
Platform Learning, Inc.	0.79	0.65	1.21	0.2259
*Progressive Learning	1.89	0.50	3.79	0.0002
*School Service Systems	1.94	0.70	2.79	0.0052
Socratic Learning	2.10	1.29	1.63	0.1035
Spectra Services	2.82	1.93	1.46	0.143
*The Princeton Review, Inc.	2.20	0.53	4.15	<.0001
*Unparalleled Solutions, Inc.	2.71	0.69	3.94	<.0001
Eligible Non-SES Participants				

*Programs performed better than group of students that were eligible but did not participate in SES (P<.05).

Appendix J

Analysis 4

Results of GLM predicting 2007 ISAT Reading scores

Parameter	Estimate	Standard Error	T-value	Pr
Non-District Providers AIM High	-0.11	0.28	-0.38	0.7031
Total R-Square = .721				

Results of GLM predicting 2007 ISAT Math scores

Parameter	Estimate	Standard Error	T-value	Pr
Non-District Providers AIM High	0.75	0.28	2.7	0.0069
Total R-Square = .771				

Appendix K

Analysis 5

Results of GLM predicting 2007 ISAT Reading scores

Parameter	Estimate	Standard Error	T-value	Pr
Intercept	78.56	3.62	21.71	<.0001
Gender	0.45	0.99	0.46	0.6476
With Disability	-11.66	0.45	-25.88	<.0001
2006 Reading Achievement	0.69	0.01	54.76	<.0001
4th Grade	0.49	5.62	0.09	0.93
5th Grade	-5.51	5.19	-1.06	0.2881
6th Grade	8.81	4.78	1.84	0.0655
7th Grade	-13.38	4.98	-2.69	0.0072
4th Grade*Disability	5.59	0.75	7.48	<.0001
5th Grade*Disability	3.14	0.70	4.5	<.0001
6th Grade*Disability	4.78	0.68	7.07	<.0001
7th Grade*Disability	3.63	0.64	5.71	<.0001
2006 Reading Performance - Warning	4.95	1.99	2.49	0.0126
2006 Reading Performance - Below	7.82	1.12	6.97	<.0001
2006 Reading Performance - Meets	7.38	0.87	8.43	<.0001
American Indian	2.66	6.90	0.39	0.6993
Asian	2.31	1.84	1.26	0.2079
Black	-2.56	0.69	-3.69	0.0002
Hispanic	0.64	0.71	0.9	0.366
White	2.42	1.07	2.27	0.0231
Female*American Indian	-3.81	7.79	-0.49	0.625
Female*Asian	3.47	2.59	1.34	0.1793
Female*Black	0.20	1.00	0.2	0.8432
Female*Hispanic	-0.68	1.03	-0.66	0.5087
Female*White	-2.33	1.57	-1.48	0.1389
2006 Reading Achievement * 4th grade	-0.03	0.02	-1.21	0.2253
2006 Reading Achievement * 5th grade	0.01	0.02	0.37	0.7105
2006 Reading Achievement * 6th grade	-0.03	0.02	-1.81	0.0703
2006 Reading Achievement * 7th grade	0.06	0.02	3.42	0.0006
Fourth Grade*2006 Reading Performance - Warning	-6.71	2.72	-2.47	0.0136
Fourth Grade*2006 Reading Performance - Below	-11.76	1.76	-6.7	<.0001
Fourth Grade*2006 Reading Performance - Meets	-8.62	1.30	-6.66	<.0001
Fifth Grade*2006 Reading Performance - Warning	-3.24	2.64	-1.22	0.2207
Fifth Grade*2006 Reading Performance - Below	-11.32	1.61	-7.02	<.0001
Fifth Grade*2006 Reading Performance - Meets	-8.56	1.20	-7.15	<.0001
Sixth Grade*2006 Reading Performance - Warning	-2.07	2.53	-0.82	0.4126
Sixth Grade*2006 Reading Performance - Below	-8.43	1.51	-5.58	<.0001
Sixth Grade*2006 Reading Performance - Meets	-7.37	1.16	-6.36	<.0001
Seventh Grade*2006 Reading Performance - Warning	4.77	2.82	1.69	0.0915
Seventh Grade*2006 Reading Performance - Below	-9.44	1.49	-6.32	<.0001
Seventh Grade*2006 Reading Performance - Meets	-7.92	1.13	-6.99	<.0001

Total R-Square = .749

Appendix L

Analysis 5

Results of GLM predicting 2007 ISAT Math scores

Parameter	Estimate	Standard Error	T-value	Pr
Intercept	84.72	3.82	22.18	<.0001
Gender	0.57	0.94	0.61	0.5422
With Disability	-6.69	0.41	-16.3	<.0001
2006 Math Achievement	0.74	0.01	58.78	<.0001
4th Grade	-1.46	5.39	-0.27	0.7872
5th Grade	-28.73	5.38	-5.34	<.0001
6th Grade	-23.94	5.19	-4.61	<.0001
7th Grade	-35.70	5.08	-7.03	<.0001
2006 Math Performance - Warning	2.01	1.46	1.38	0.1685
2006 Math Performance - Below	-5.18	1.14	-4.55	<.0001
2006 Math Performance - Meets	-4.50	0.88	-5.14	<.0001
American Indian	-8.87	6.54	-1.36	0.1751
Asian	2.79	1.73	1.61	0.1066
Black	-1.84	0.66	-2.81	0.0049
Hispanic	0.74	0.67	1.1	0.2727
White	1.12	1.01	1.1	0.2713
4th Grade*Disability	1.64	0.68	2.41	0.0158
5th Grade*Disability	2.18	0.64	3.42	0.0006
6th Grade*Disability	0.03	0.60	0.04	0.9664
7th Grade*Disability	-0.16	0.58	-0.28	0.7785
Female*American Indian	11.04	7.39	1.49	0.1352
Female*Asian	4.84	2.47	1.96	0.05
Female*Black	0.24	0.95	0.25	0.8039
Female*Hispanic	-0.34	0.97	-0.35	0.7292
Female*White	-1.88	1.50	-1.26	0.2091
2006 Math Achievement * 4th grade	-0.08	0.02	-3.74	0.0002
2006 Math Achievement * 5th grade	0.08	0.02	3.91	<.0001
2006 Math Achievement * 6th grade	0.05	0.02	2.81	0.0049
2006 Math Achievement * 7th grade	0.10	0.02	6.08	<.0001
Fourth Grade*2006 Math Performance - Warning	-4.42	2.11	-2.1	0.0359
Fourth Grade*2006 Math Performance - Below	0.98	1.62	0.61	0.5436
Fourth Grade*2006 Math Performance - Meets	1.95	1.17	1.67	0.0941
Fifth Grade*2006 Math Performance - Warning	0.32	2.18	0.15	0.8832
Fifth Grade*2006 Math Performance - Below	0.28	1.69	0.16	0.8697
Fifth Grade*2006 Math Performance - Meets	-2.57	1.26	-2.03	0.0421
Sixth Grade*2006 Math Performance - Warning	7.49	2.36	3.18	0.0015
Sixth Grade*2006 Math Performance - Below	5.60	1.83	3.06	0.0022
Sixth Grade*2006 Math Performance - Meets	7.27	1.48	4.9	<.0001
Seventh Grade*2006 Math Performance - Warning	7.16	2.16	3.32	0.0009
Seventh Grade*2006 Math Performance - Below	3.43	1.61	2.13	0.0331
Seventh Grade*2006 Math Performance - Meets	2.87	1.25	2.29	0.0221

Total R-Square = .790

Appendix M

Breakdown of ISAT Performance Levels and Scale Scores

GRADE	Reading				Math			
	Warning	Below	Meets	Exceeds	Warning	Below	Meets	Exceeds
<i>3rd</i>	120-155	156-190	191-226	227-329	120-162	163-183	184-223	224-341
<i>4th</i>	120-157	158-202	203-236	237-341	120-171	172-199	200-246	247-355
<i>5th</i>	120-160	161-214	215-246	247-351	120-179	180-213	214-270	271-369
<i>6th</i>	120-166	167-219	220-256	257-360	120-193	194-224	225-275	276-379
<i>7th</i>	120-173	174-225	226-266	267-369	120-206	207-234	235-280	281-392
<i>8th</i>	120-179	180-230	231-277	278-364	120-220	221-245	246-287	288-410

CHICAGO
MARIACHI
PROJECT



October 6, 2016

Illinois State Board of Education
100 North First Street
Springfield, IL 62777-0001

Re: Arts Education and the Implementation of the Every Student Succeeds Act in Illinois (ESSA)

Dear Superintendent Smith, Chairman Meeks and Members of the Board,

The Chicago Mariachi Project (CMP) is a nonprofit organization whose mission is to elevate the Art of Mariachi and promote excellence in musicianship through education, coordination and support. CMP currently has programs in 5 Chicago Public Schools (CPS) and will be expanding into 2-3 additional schools this year. Through our partnerships and work we bear witness to the difference that the arts add not only to a young person's development but the value that it brings to an entire community as well. CMP unites our voices along with other arts organizations across the State of Illinois in asking for your consideration and support, as you enact the Every Student Succeeds Act in Illinois (ESSA), of policies that will assure access to arts education as part of a "well-rounded education" for every student in Illinois such as:

- including access to arts education as part of the state's accountability formulas and systems being developed to meet the ESSA requirements. ESSA language is very clear that states must now include multiple progress measures in assessing school performance. **These can include measures like student engagement, parental engagement and school culture/climate—all which are achieved by the arts in schools.** These measures can be very important in determining the outside supports their students may not be getting that could help them be more successful.
- encouraging school districts to include arts education as part of the well-rounded section of Title I schoolwide plans under ESSA; encourage use of Title 1 funds to meet curriculum goals to serve all students
- emphasizing the role of arts education in meeting school goals for parent and family engagement, a key component of ESSA; the arts bring a sense of community to schools, and celebrate student accomplishment at every level.
- including arts education teachers as the state assesses its needs and opportunities for ALL students as part of the state's Title IV-A Well-Rounded Education needs assessment.
- encouraging all districts to include the arts in their Title IV-A needs assessment and consider funding for arts education via ESSA Student Support and Academic Enrichment Grants (Title IV) so as to assure access and opportunity for arts education for all students.

CHICAGO
MARIACHI
PROJECT

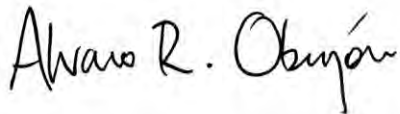


- ensuring that schools and districts are aware that ESSA has updated the definition of STEM (Science, Technology, Engineering, and Math) to include the arts, STEAM. Given that the federal law considers the arts as part of STEM, please consider including the arts as eligible for STEM funding in the education budget.

ESSA makes it clear that a well-rounded education that includes the arts is essential for young people. CMP couldn't agree more. We firmly believe that every student in Illinois should be taught, and have access to, quality arts programming. Please **ensure that the arts are a core part of evidence-based budgeting**, and that there is funding for the arts in the next Illinois state budget.

Thank you for your leadership and consideration of these important educational priorities which will ensure that Illinois' young people truly have a well-rounded education. If you have any questions please do not hesitate in contacting me.

Kind regards,



Álvaro R. Obregón, President and Founder

Chicago Mariachi Project
1819 W. 19th St.
Chicago, IL 60608

(312) 967-9922
arobregon@chicagomariachiproject.org



A Union of Professionals

Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

October 7, 2016

Sent via email to essa@isbe.net

Dear Dr. Smith:

On behalf of the 103,000 members of the Illinois Federation of Teachers (IFT) and Chicago Teachers Union (CTU), we write to comment on the first draft of the Illinois State Board of Education's plan to implement the Every Student Succeeds Act (ESSA). As part of our comments, we enclose the attached document, which contains a set of jointly held principles of the IFT, the Chicago Teachers Union and the Illinois Education Association. In addition to the jointly held principles, we have also made comments below that provide further context and express concerns we have regarding the initial draft of the state plan.

We see ESSA as an important opportunity to remedy decades of inadequate and inequitable resource distribution, an opportunity to end fifteen years of the test and punish model of school accountability that has overwhelmingly impacted low-income Black and Latino students, an opportunity to develop and implement performance based assessments tied to experiential learning, and an opportunity to revise teacher evaluations so they are fair to all practitioners and oriented toward feedback and professional learning. Our comments reflect underlying principles of how the state should proceed with the changes allowed by ESSA so that all students in Illinois, not just those from affluent areas, can attend the schools they deserve.

We value and appreciate the discussion that takes place when stakeholder workgroups are convened, both by ISBE and other through venues such as the state P20 Council and the Illinois Balanced Accountability Measure Committee. These stakeholder workgroups play an important role in the development of the state's ESSA plan. We encourage ISBE to continue convening these groups, and further, we encourage ISBE to include time during meetings for stakeholders to try and reach consensus on key topics. In the event consensus is not possible, we urge ISBE to document where agreement and disagreement exists among stakeholders.

For example, we are concerned with how ISBE has presented this summer's meetings of the ISBE-convened accountability workgroup. The workgroup met three times and had meaningful discussion about a new accountability system, but the workgroup spent very little time, if any, coming to consensus on ideas presented. However, the first draft of the ESSA state plan in Section 3.1 presents what it describes as "summaries created from the work of the Accountability Workgroup" (page 18), creating the appearance of consensus and agreement among stakeholders present.

The experiences of our members, reflected below, provide context to the jointly held principles attached:

- The required academic indicators of the ESSA accountability system must be weighted in such a manner to address the inherent inequities and unfairness of the state's standardized test measures, particularly as they impact students with disabilities, English learners, and students living in poverty. Under No Child Left Behind (NCLB), school accountability indicators have reflected the impact of poverty on students and schools. The result has created a culture of blame and punishment, rather than support. School quality measures must minimize the impact of poverty in school accountability by maximizing weights attached to inputs that schools control, backed by sufficient resources to meet the goals of each school.
- Assessments should be rooted in classroom content and practice. However, assessments under NCLB and Race to the Top were used to rank, sort, and punish schools, not provide useful feedback to help students and schools improve. These assessments warped curricula and drastically reduced time available for authentic, experiential learning opportunities not easily measured or differentiated, and narrowly defined test preparation was implemented. In Chicago, district demands for test preparation led to diminutions of locally determined curricula. These assessments also created incentives to focus on students who could move a school's or teacher's scores with only a couple of additional correct answers at the expense of deeper learning. These standardized assessments came at a significant economic cost to districts, which crowded out spending on more meaningful educational experiences. Assessments should measure student performance, what students know and can do, rather than reflect the effects of poverty.
- Teacher evaluation systems should be fair and support collaborative professional environments and continuous improvement. Instead, Illinois' teacher evaluation system was developed in response to Race to the Top and was based on false assumptions, namely that large numbers of teachers across Illinois were performing horribly and needed to be replaced. University of Chicago research on evaluations in Chicago's public schools has indeed found the opposite: teacher performance is overwhelmingly effective, even measured against a more intensive evaluation standard. Researchers found other, deeply troubling consequences: teachers in high poverty schools, especially Black and Latino/a teachers, are at a significant disadvantage under the new evaluation system; many teachers do not trust their ratings, especially the elements of student growth; and evaluators need additional training, particularly in providing effective feedback. New evaluation expectations and subjectivity of measures, coupled with inadequate training for teachers and evaluators, have created feelings of distrust across the state. Furthermore, the new system requires a burdensome commitment of time, effort, and additional funding to implement and maintain. Illinois has an obligation to make the necessary changes to get teacher evaluation right.

We also wish to specifically comment on ISBE's plan to use a multi-tiered system of support (MTSS) as the foundation of support for school improvement. We want to go on record the IFT and CTU will oppose using MTSS in its current form unless that plan is fully funded and resourced. Since 2007, when Illinois first mandated Response to Intervention (RTI), now called MTSS, through special education administrative rule, IFT has indicated support for this process when it is well resourced, funded and implemented with fidelity. However, whether called RTI or MTSS, the state has not sufficiently or equitably funded implementation to establish statewide MTSS capacity. We have serious concerns about the implementation of RTI, now MTSS, statewide. Our members have experienced increased mandates and paperwork which reduce teaching time, increase testing and prevent or delay student access to special education services. In 2013, the most recent year data are available, the I-RTI Network (now called the IL-MTSSN) provided services to roughly 10 percent of Illinois school districts, the 83 school districts which signed collaborative agreements to participate in the Network. If well implemented and funded, MTSS shows promise to provide quality early intervention services to students most in need of additional support, but this process only works if properly funded and implemented. Without proper funding, we cannot support MTSS.

We also oppose ISBE's intention to design and implement a rigorous review and approval process for external providers that will become part of statewide MTSS (page 27). We are concerned that ISBE does not have the internal capacity for MTSS to be successful. As a result of our members' experience with poor RTI implementation, and the use of external providers in the role of Lead Partners to oversee school improvement 1003(g) grants (SIG), we must oppose this aspect of the plan. Further, there is no qualitative or quantitative data on the effectiveness of the use of external Lead Partners in SIG grants. It is troubling the state would undertake a similar, untested concept for implementation of its proposal for statewide MTSS, rather than build ISBE staff capacity.

The IFT and CTU look forward to reviewing the second draft of the state ESSA plan. We will actively participate and provide more detailed comment on a growth model, proposed college and career readiness definitions, proposed additional indicators in the school accountability model, the use of specific assessments, and other elements of the state's ESSA plan through ISBE workgroups, the Illinois Balanced Accountability Measures Committee, the state P20 Council, and future written comment. In the next version of this critical plan for Illinois schools, we urge ISBE to address our concerns and incorporate the attached guiding principles.

Sincerely,



Dan Montgomery
IFT President

 NBCT

Karen GJ Lewis, NBCT
CTU President

Enclosure



A Union of Professionals



Our ESSA Guiding Principles Document

ESSA is a real opportunity for Illinois. The law is an opportunity to remedy more than fifteen years of the rank, sort, and punish mentality which was part of No Child Left Behind and Race to the Top. ESSA dramatically reduces the power of the U.S. Department of Education and gives states authority to design and implement new systems, including assessment, accountability and intervention. The law is an opportunity to address the long history of inequality in Illinois' schools, to acknowledge and support the needs of the state's rapidly changing student demographics, and to look at the inputs that make schools thrive. Illinois has a responsibility to focus on inputs: adequate and equitable funding, early childhood learning, broad and rich curricula, safe environments, wraparound services, timely and embedded professional learning for educators, and time to focus on learning rather than testing.

As Illinois moves to implement ESSA, our Unions will continue to be engaged in the process as advocates for students, educators and education support professionals. We will continue to collaborate and partner with state legislators, parents, school boards, superintendents, community partners and bargaining teams to make sure implementation goes smoothly and that educators maintain a strong voice in the process.

Our Guiding Principles on Evidence-based Initiatives that Work

School and district accountability must shift dramatically to address inequity and provide support and resources, so school and community members can collaboratively identify evidence-based initiatives that work for them locally, rather than face blame and punishment. All students have a right to learn and achieve academic success regardless of where, or under what circumstances, they live. Too often, children from disadvantaged areas, whether in urban centers or rural communities, lack the additional supports promoting learning which other children have at home and in their communities. ESSA opens the door to providing additional supports and resources to those students, based on evidence-based practices determined locally by practitioners, families, and community members who best know the community and school context. ESSA requires authentic practitioner, student, and family member voice in these local decisions.

All schools can be successful when the following factors are in place:

- Sufficient and equitable funding and resources provided to students in their classrooms, not to vendors and consultants,
- A broad, rich, and meaningful curriculum,

- Wraparound services delivered through the community schools model that clearly addresses the needs of students, and
- Appropriate time for school staff to analyze, plan, implement, and re-assess for change with a focus on fostering relationships within the school building and school community.

Our Guiding Principles for New Accountability

The state's ESSA plan for an accountability system should be based on fair, meaningful accountability and differentiated supports with a commitment to resource equity and sufficiency. To that end, and on behalf of our members, we put forward the guiding principles below. We look forward to further conversations to craft an accountability system using measures, weights, goals and aggregation of measures which aligns with these principles.

Principle 1: The new accountability system must be based on multiple indicators tied to state and district resource accountability. It must reflect each school's efforts to address the factors that put students at risk, including the number of children in the school who live in poverty, are learning English, and come to the school with other special needs.

Principle 2: Academic and school quality indicators must not be weighted so as to disadvantage schools due to any socio-economic factor or disability that a child brings to the school.

Principle 3: Effective implementation of a new accountability system must include time for districts, schools and educators to adjust to different accountability expectations, as well as clear, strong, consistent communication with the public, educators, stakeholders, elected officials and parents on the uses and limitations of the new system.

Principle 4: The Illinois College and Career Ready Indicator Framework must account for a fuller picture of college and career readiness, so all children are treated fairly within the definition of what it means to leave our K-12 system ready to succeed in their chosen pathway. It must lift up all students, particularly those not planning on attending college upon graduation.

Principle 5: Schools must not be defined by a single score derived from the multiple measures included in the state's new accountability system. The work done in schools is simply too complex to be captured by a single score, letter grade or other designation.

Our Guiding Principles on Assessment

Assessments under No Child Left Behind and Race to the Top were used to rank, sort, and punish schools. These assessments reshaped curricula and drastically reduced time available for authentic, experiential learning opportunities not easily measured or differentiated. We believe assessments should be subject to the following principles:

Principle 1: Assessments must be rooted in classroom content and best practices. They must measure what students know and can do, rather than reflect the effects of poverty.

Principle 2: Assessments must not be used to rank, sort, and punish students and schools but instead be used as an opportunity to demonstrate learning and provide feedback. Assessments used for accountability must support authentic learning opportunities that inform instruction.

Principle 3: Assessments related to accountability must be limited in length and frequency by setting a limit on the aggregate amount of instructional time devoted to accountability assessments.

Principle 4: Assessments used for accountability must not require test-preparation activities.

Principle 5: As long as students are subjected to over-testing through developmentally and academically inappropriate standardized tests that are unaligned to curricula and as long as teachers do not have time for meaningful professional development, parents must have the right to opt their children out of state assessments.

Our Guiding Principles on Teacher Evaluation

Illinois' current system of teacher evaluation has created systemic pressures on local education agencies across the state. In general, the requirements are cumbersome, time-consuming, and do not support the supposition that the purpose of teacher evaluation is to support instructional practice. Neither teachers nor evaluators have received sufficient training. We believe teacher evaluation should be subject to the following principles:

Principle 1: Teacher evaluation processes must be fair and free from bias, regardless of teaching context.

Principle 2: Teacher evaluation must ensure teachers receive meaningful feedback that results in professional growth opportunities.

Principle 3: Value-added modeling (VAM) is neither valid nor reliable and must not be used for any part of a teacher evaluation system.

Principle 4: Teacher evaluation systems must not include unreliable student growth measures, but rather be based on measures teachers trust and use processes which minimize the time and stress associated with evaluation.



children's home + aid

CENTER for
Policy | Practice | Innovation

Report on the Actions of U.S. States Regarding Education for Students in Foster Care and the Every Student Succeeds Act (ESSA)

Students in foster care have lower academic outcomes than their peers, even when controlling for other factors such as poverty level. In fact, only 50% of students involved with the child welfare system complete high school by age 18¹. With the enactment of the Every Student Succeeds Act, states have the opportunity to enhance the level and impact of support provided to students in foster care to promote educational stability and long-term academic success. In an effort to better serve students in foster care and close the achievement gap between those students and their peers, several states have taken distinct steps including employing educational liaisons and building information sharing networks. The following report contains information on the ongoing work of several states who have taken purposeful and progressive steps towards helping students in foster care succeed academically. The Center for Policy, Practice & Innovation at Children's Home + Aid encourages states, agencies and advocates to review strategies to improve outcomes for students in foster care and use this information to inform implementation of the Every Student Succeeds Act and other state and agency policies pertaining to students in foster care.

¹ National Working Group on Foster Care and Education. (2014, January). Fostering success in education: National factsheet on the educational outcomes of children in foster care. In *Foster Care to Success*. Retrieved October 3, 2016, from <http://www.fc2success.org/wp-content/uploads/2012/05/National-Fact-Sheet-on-the-Educational-Outcomes-of-Children-in-Foster-Care-Jan-2014.pdf>

Note: Not all states are represented in this report. The states discussed below have implemented or plan to implement strategies to promote the academic success and overall well-being of students in foster care. All information was provided by key informants unless another source is listed (see footnotes). This report only informs on components of policies that are intended to benefit students in foster care. See the sources listed for more information about these policies and practices. States are listed in alphabetical order and not indicative of rank or quality.

Arizona

Key informant²: Peter Hershberger, Director, FosterEd: Arizona, National Center for Youth Law

Pre-ESSA Initiatives

In 2014, the National Center for Youth Law began a pilot program establishing positions for three educational liaisons in child welfare agency offices throughout Pima County, Arizona. These liaisons developed a support structure so each student on their caseloads would have an educational champion and an education team. These supports then collaborated to set goals for the student's education, track progress and achievement of goals, and identify and address any educational concerns or needs. The three liaisons also serve as advocates for students in foster care by raising awareness about their specific needs with agencies and school districts. They are employed by the National Center for Youth Law and funded by private foundations.

The success of this program led to the enactment of House Bill 2665 to fund the statewide Foster Youth Education Success Program, which will begin in summer 2017. When implementation begins, educational liaisons will be funded by public dollars and private foundation grants.

Every Student Succeeds Act (ESSA)

The Department of Child Safety has appointed a state-level point of contact.

California

Key informants^{3,4,5}: Lisa Guillen, Education Programs Consultant, Foster Youth Services, California Department of Education; Casey Schutte, Director, FosterEd: California, National Center for Youth Law

Assembly Bill 490

Passed in 2003, AB 490 requires educational liaisons in every local education agency (LEA). Often, the educational liaison is an existing administrator or staff member. In districts with high concentrations of students in foster care, the educational liaison may be a separate job position.

As the legislation does not authorize funds, it is the responsibility of each LEA to secure the funding necessary to meet AB 490 requirements. According to the AB 490 Fact Sheet⁶, "Each school district and county office of education must designate an educational liaison for foster youth, whose duties are: To ensure proper educational placement, school enrollment, and checkout from school; To

² Personal communication, R. Velcoff Hults, August 25, 2016

³ Personal communication, C. Schutte, August 31, 2016

⁴ Personal communication, R. Velcoff Hults, August 25, 2016

⁵ Personal communication, L. Guillen, August 3, 2016

⁶ California Foster Youth Education Task Force. (2008, October). AB 490. Retrieved August 9, 2016, from http://www.ebclo.org/pdfs/AB_490_Fact_Sheet.pdf

assist with the transfer of grades, credits, and records when there is a school change; and To request or provide school records within 2 business days when there is a change of school”.

Local Control Funding Formula⁷

California operated on a 40-year-old education finance system until 2013 when the Local Control Funding Formula (LCFF) was passed. With an estimated cost of \$18 billion and an eight year implementation timeline, LCFF expands the definition of “foster youth” and shifts services to a more localized approach. “Foster youth” is now defined as all youth involved in an open case, regardless of current placement (i.e. kinship, temporary custody, foster home)⁸.

LCFF established various grants (base, supplemental and concentration) for school districts and charter schools in an attempt to streamline funding. LCFF provides a supplemental grant of 20% the adjusted base grant (determined by grad clusters, i.e. K-3) multiplied by average daily attendance (ADA) and the unduplicated percentage of students deemed “targeted disadvantaged”. Targeted disadvantaged students include English learners, those qualifying for free or reduced-price meals, students in foster care or any combination of the aforementioned. It is important to note the supplemental grant is based on *unduplicated* percentage.

Furthermore, California Assembly Bill (AB) 854, which was implemented in October 2015, established separate funding for oversight activities and instructional programs for county offices of education. Regarding service delivery, LCFF reassigned responsibility for direct services for students in foster care from county offices to school districts for a more localized approach.

LCFF shifted county offices from a direct service to capacity-building model, requiring them to build the infrastructure for school districts to provide direct services. This new model required the creation of collaborative structures with schools, community partners, and other stakeholders in order to build systems to support students in foster care more holistically.

Assembly Bill 854

Passed in 2015, AB 854 increased foster youth funding for county offices of education. This bill aligned the work of county offices of education with priorities for schools identified in LCFF. This alignment creates a collaboration model promoting capacity building for schools in order to expand services for pupils in foster care.

Every Student Succeeds Act (ESSA)

As of the key informant interview on August 3, 2016, California was still in the early stages of planning for ESSA. In addition to the AB 490 required educational liaisons, California has “county coordinators” in every county education agency serving as designated Points of Contact (POCs).

There is one POC for the State Education Agency (Lisa Guillen of the Department of Education), along with coordinators in all 58 counties and educational liaisons in all 1100 LEAs. These positions were in place prior to ESSA and are in compliance with ESSA requirements. To coordinate the implementation of LCFF, AB 854 and ESSA, the state has charged two county offices with

⁷ California Department of Education. (2016, April 4). Local Control Funding Formula overview. Retrieved August 9, 2016, from <http://www.cde.ca.gov/fg/aa/lc/lcffoverview.asp>

⁸ Assemblymember Shirley Weber, Ph.D. (2015, October 14). Foster youth services/LCFF alignment. Retrieved August 9, 2016, from http://www.courts.ca.gov/documents/BTB_23_4H_1.pdf

providing technical assistance for immediate implementation and development of a sustainability plan. California anticipates costs will increase with the implementation of ESSA.

Delaware

*Key informant⁹: Candice Brooks, Executive Assistant to the Secretary of Education,
Delaware Department of Education*

*Edits for content and clarity by: Jennifer Davis, Education Associate for Student Services and Special Populations,
Delaware Department of Education*

McKinney-Vento Act

Beginning in 2005, Delaware law¹⁰ has included all children in foster care under the “awaiting foster care placement” definition of the McKinney-Vento Act. This has allowed all students in foster care to receive services to protect their educational rights and stability, including best interest meetings and school of origin transportation. Delaware has applied all requirements under McKinney-Vento to the care and services for students in foster care.

Educational Liaisons

Prior to ESSA, LEA Homeless Liaisons have provided services to students in foster care in the same capacity they served students experiencing homelessness. With the implementation of ESSA, LEAs have been asked to identify a Foster Care Liaison to specifically serve students in foster care. Some LEAs will identify the current Homeless Liaison to serve in both roles. Other LEAs are taking the opportunity to identify a separate person as the Foster Care Liaison.

Every Student Succeeds Act (ESSA)

Delaware will continue to promote educational stability for students in foster care through the 2016-2017 school year using the already established McKinney-Vento process. They intend to continue providing these services, including best interest meetings and school of origin transportation, moving forward. Transportation is currently provided to students in foster care through the LEA where the child is enrolled. With the pending implementation of ESSA, Delaware has established a committee to determine cost responsibility for transportation in the future.

A committee comprised of a wide range of individuals representing education and child welfare is in the process of examining current practice and making recommendations for change based on ESSA. Delaware’s child welfare agency has appointed POCs for each county. The LEAs received requests to appoint a POC and submit the name to the Department of Education by Sept. 1, 2016 (as of the key informant interview on Aug. 24, 2016). The Department of Education plans to create and maintain a contact list of all POCs on the Department of Education/Foster Care webpage, which is currently in development. As of Aug. 24, 2016, the Department of Education is still gathering data to determine the cost implications of ESSA.

⁹ Personal communication, C. Brooks, August 24, 2016

¹⁰ State of Delaware. (2005). Title 14: Education: Free public schools: Chapter 2: The public school system: Subchapter 1: System of free public schools . Retrieved September 1, 2016, from http://delcode.delaware.gov/title14/c002/sc01/index.shtml#P25_330

District of Columbia

Key informant¹¹: Megan Dho, Education and Child Care Supervisor, Office of Well Being, DC Child and Family Services Agency

Pre-ESSA Initiatives

DC Child and Family Services Agency (CFSA) has an education unit with five education resource specialists whose primary function is to assist social workers in addressing any education barriers encountered by students involved in the child welfare system. These specialists also assist in connecting foster children to more appropriate education opportunities and services. The staff of this unit all have education backgrounds and serve as a child welfare contact with the schools. Since LEAs in the DC Metro area do not have specific individuals designated as foster child liaisons, the education staff at CFSA contacts whomever at the school is best to address each particular situation. For example, if the situation involves discipline, they might contact the Dean of Students to gather more information.

Prior to ESSA, CFSA also conducted a pilot project with one Maryland school district, Prince Georges County, that is responsible for educating approximately a quarter of all students in DC foster care. CFSA provided the school district with a contact sheet for each DC child in foster care enrolled in their school district at the beginning of the school year. The document included the name and contact information for the student's social worker, present caretaker and education decision maker. It also provided the contact information for the staff of CFSA's education unit and guidance on who to call when different types of educational issues arise (e.g., for field trip permissions, disciplinary actions, etc.). This was to promote better communication between the child welfare agency and the schools regarding the educational needs of youth in foster care. CFSA had plans to provide this type of contact/information sheet to all LEAs educating DC youth in foster care prior to the enactment of ESSA.

Over the course of the last two years, CFSA has dedicated itself to developing a comprehensive education strategy aimed at ensuring the entire agency is working together to improve the educational outcomes for students in foster care. With consultation from the American Bar Association's Legal Center for Foster Care and Education, they have used the ABA's Blueprint for Change document to guide the development of their own Blueprint for Change which identifies six main action areas for change.

One example of the work being accomplished and planned for under this initiative is the improvement of data sharing between the child welfare agency and the LEAs serving DC youth in care. CFSA now has access to data allowing them to verify student enrollment and retrieve achievement test scores, grades and attendance data for nearly every child in the agency's custody. For example, CFSA receives basic education data on a quarterly basis from select local education agencies serving its youth, including grades, GPA and attendance. This allows CFSA to conduct trend analysis on DC foster children's educational performance and share the information directly with social workers so they are informed about individual children's school performance and can intervene as needed.

CFSA is also working to improve their own data capture regarding the current educational status for all youth in care so they can more efficiently and appropriately target resources. For example, with new information being gathered on the school or childcare status of children in foster care ages 0-5,

¹¹ Personal communication, M. Dho, August 24, 2016

CFSA can now identify children in daycare settings who may be eligible for preschool or other early learning programs (i.e., Early Head Start or Head Start). The agency's early childhood resource specialist can then reach out to the families of those children and inform them of early learning opportunities the child can take advantage of to enhance their school readiness and development.

CFSA also doubled the tutoring budget for children and youth involved with the agency to provide more in-home tutoring services. This was to respond to the remediation needs of many children and youth when they come into care. Additionally, CFSA's budget also includes a line item to provide educational incentives for students. For example, students who attended the Pathways to Success event for 9th to 10th graders in order to learn what they can do to become more college ready and network with professionals were given prizes for participation from the funds allotted to education incentives.

This incentive money has also been used to encourage parent engagement. For example, parents can earn points toward prizes when they provide proof of participation in events such as a PTA meeting or parent-teacher night. CFSA has also used the incentive program during the school year for all grade levels to encourage improved student achievement. Students can identify a specific goal, such as passing a class or having perfect attendance, at the beginning of the year. If they can prove achievement of this goal at the end of the term, they are eligible to receive a prize.

Since the passage of the Fostering Connections Act of 2008, CFSA has also provided school transportation services to support school stability after removal and placement changes when it is determined to be in the child's best interest. They have also developed a form for social workers to use to facilitate best interest determinations. CFSA has a private transportation contract to receive and accept referrals from social workers who need transportation for students in foster care. To capitalize on the provisions of Fostering Connections, CFSA also developed a mechanism to identify students who are Title IV-E eligible to receive the reimbursement from the federal government for the transportation cost. This reimbursement only covers a portion of the cost. CFSA has assumed the remainder of the cost.

Every Student Succeeds Act (ESSA)

CFSA's strategy for educating children and youth in foster care has shifted since the enactment of ESSA. With the POC requirement, CFSA education specialists will now have a more streamlined approach to communicating with LEAs. CFSA has sent letters to every LEA in the DC metropolitan region that educated or has the potential to educate DC foster youth to give them contact information for the Education & Child Care Supervisor as the child welfare POC. The letter then invites the LEAs to identify their own POC and provide that information to CFSA. The key informant reported already receiving responses from LEAs regarding their designated POC for children in foster care. CFSA has begun using these responses to develop an internal contact list for LEA POCs.

CFSA also began working towards new mandates this summer to develop transportation plans with every LEA to ensure transportation is provided to every student in foster care who needs it. CFSA recently met with representatives from DC's state education agency (SEA) to discuss the development of these plans and agreed to work with them in developing guidance to all LEAs in DC on the transportation plan requirement. CFSA and the SEA intend to have this guidance completed and issued in September 2016.

CFSAs hope its transportation costs will decrease because of the ESSA-required shared responsibility of transportation cost. Though not finalized, the state has considered including in the guidance a mandate for LEAs to identify their available transportation resources, such as private transportation or dedicated funds, so resources can be efficiently utilized. If the LEA does not have any transportation resources, the state is considering a set formula to provide a certain percentage of reimbursement to the child welfare agency for transportation cost outlays.

Idaho

Key informant¹²: Karen J.M. Seay, Director, Federal Programs, State Department of Education

Every Student Succeeds Act (ESSA)

As of the key informant interview on Aug. 1, 2016, the Idaho State Department of Education (ISDE) has identified a Foster Care Liaison and is working with Health and Welfare counterparts to develop an agreement addressing key issues, which include the transportation provisions required by ESSA. The ISDE supports a 50/50 split between the two agencies in the event a transportation agreement cannot be reached.

Illinois

Key informants¹³: Melina Wright, Federal Liaison, Illinois State Board of Education; Tiffany Gholson, Associate Deputy Director in the Office of Education & Transition Services, Office of Child Well-Being, Illinois Department of Children and Family Services

Educational Liaisons

The successful enactment of PA99-0781 in August 2016 encourages the appointment of school district liaisons for students in foster care. These liaisons will facilitate enrollment of students in the event of a school transfer, ensure timely transfer of records, advocate for necessary social services in the new school and plan for on-time graduation so academic progress is not interrupted. The law encourages liaisons to build support structures in schools and communities to promote the academic success of students in foster care. This law was effective immediately following the Governor's approval on Aug. 12, 2016.

Every Student Succeeds Act (ESSA)

Illinois is still in the beginning stages of ESSA implementation, but has taken several steps to ensure development of a comprehensive state plan. The Illinois State Board of Education (ISBE) has conducted listening tours to be inclusive of parents, educators, administrators, and community members in the plans for ESSA implementation. The first round of listening tours began in April and the second round will begin in September. ISBE has established several workgroups to provide input on development of the accountability system. On Aug. 25, 2016, ISBE released the first draft of the ESSA state plan and requested comments from the public.

¹² Personal communication, K. Seay, August 1, 2016

¹³ Personal communication, M. Wright & T. Gholson, August 26, 2016

Indiana

Key informant¹⁴¹⁵: Julie Smart, Program Coordinator for School Social Work and McKinney-Vento Education Coordinator, Indiana Department of Education; Rachel Velcoff Hults, Chief Operating Officer, FosterEd, National Center for Youth Law; Melaina Gant, Education Services Director, Indiana Department of Child Services

Multi-disciplinary Approach

Indiana has previously protected the education rights of students in foster care through cross-collaboration with the Department of Children Services, foster care agencies, school transportation directors, school social workers and school guidance counselors. They anticipate this collaboration to continue and expand under the implementation of ESSA.

Educational Liaisons

In 2011, the Department of Child Services launched a county-wide pilot for a child welfare-based education program. This became a statewide program in 2012 with an education services director and regional educational liaisons. Liaisons identify educational needs of students in foster care and seek to meet those needs through collaboration with youth, biological parents, foster parents, family case managers and school district personnel. These liaisons correspond frequently with the state Department of Education and receive yearly professional development from the McKinney-Vento Education Coordinator.

Every Student Succeeds Act (ESSA)

It is important to note the Indiana Department of Education is still working on the process of implementing ESSA. As of Aug. 18, 2016 key informant interview, Indiana has named a state-level ESSA point of contact and conducted internal meetings to develop the guidance. The Department of Education and Department of Child Services have plans for joint meetings in the future to develop and distribute the state-level guidance, including provisions for transportation. The state intends to have joint guidance in place and issued prior to the scheduled fall break (Oct. 3, 2016) to address students in foster care.

To comply with the POC requirement, the state Department of Education is realigning several internal positions. The current McKinney-Vento Education Coordinator will become the state POC for foster care as another internal staff member assumes the McKinney-Vento position. The state plans to use school social workers and/or school guidance counselors as the LEA POCs. These staff persons will work with Department of Child Services liaisons and case managers to make appropriate arrangements and provide services for students in foster care. The Department of Child Services has designated the Education Services Director as the state-level child welfare POC. The Education Services Director reports they are on-track to meet the December deadline.

The LEAs can retrieve information about ESSA through online courses and regional workshops provided by the state, and on-going technical assistance will be available from the Department of Education and Department of Child Services. The Department of Education is currently uncertain about the cost increase for transportation. The Department of Education and Department of Child Services intend state guidance to permit the most efficient use of funds by LEAs for transportation costs. They do not anticipate an increase in personnel costs due to the internal realignment.

¹⁴ Personal communication, J. Smart, August 18, 2016

¹⁵ Personal communication, R. Velcoff Hults, August 25, 2016

New Jersey

Contact¹⁶: Matthew Angelo, Federal Liaison, Division of Legal and External Affairs,
New Jersey Department of Education

Education Stability Law

In 2010, New Jersey passed the Education Stability Law¹⁷ in response to the federal Fostering Connections to Success and Increasing Adoptions Act of 2008. New Jersey developed this state plan to support and implement the federal legislation. The Education Stability Law was implemented by the joint efforts of the Department of Children and Families, Department of Education and the Office of the Child Advocate.

Title 18A:7B-12 Determination of District of Residence¹⁸

This title set parameters to determine which school district is responsible for students of vulnerable populations in order to determine the appropriate funding. The parameters are as follows: If the child is in the district of their resource family home prior to the enactment of this law, the child will remain in that district. If the child is moved to a new resource family home, group home, skill development home, private school or out-of-state facility on or after the enactment of this law, the child will remain in the school district they lived in prior to their new placement.

If the child becomes homeless, they will remain in the school district they belonged to prior to homelessness. If the child's circumstance cannot be resolved by these provisions, the state is required to assume financial responsibility for the full tuition (equal to the "approved per pupil cost") of the child. If the child is living in an out-of-district domestic violence shelter or transitional living facility for more than one year or if the child is in a Department of Education-approved private educational facility for students with special needs, the Department of Education will pay the department of Children and Families, Department of Corrections, or Juvenile Justice Commission. If the child is homeless or placed in a resource family home, the Department of Education will pay the school district for the "weighted base per pupil amount".

Title 30:4C-26 Placing Child in Resource Family Home or Institution¹⁹

This title sets parameter for determining when moving the child to a new school is in their best interest. The parameters are as follows: The determination will be made by the Division of Youth and Family Services in the Department of Children and Families. The child will remain in their original school until the determination is made. If the school placement threatens safety or is otherwise damaging to the child, they will be immediately transferred to the school district of their resource family home. The Division of Youth and Family Services will consult with the parent/guardian, child's law guardian, a school representative from the present district and a school representative from the prospective district(s) when possible.

¹⁶ Personal communication, M. Angelo, August 10, 2016

¹⁷ Department of Education. (n.d.). Educational stability for youth in foster care. In *State of New Jersey Department of Education*. Retrieved September 1, 2016, from <http://www.state.nj.us/education/students/safety/edservices/stability/>

¹⁸ State of New Jersey. (2014). 18A:7B-12 Determination of district of residence. Retrieved August 10, 2016, from <http://www.nj.gov/dcf/documents/divisions/dyfs/18A7B12.pdf>

¹⁹ State of New Jersey. (2010). 30-4C-26 Placing child in resource family home or institution. Retrieved August 10, 2016, from <http://www.nj.gov/dcf/documents/divisions/dyfs/304C26.pdf>

The following factors were listed for consideration when making the best interest determination in the title²⁰: “safety considerations; the proximity of the resource family home to the child’s present school; the age and grade level of the child as it relates to the other best interest factors listed in this subsection; the needs of the child, including social adjustment and wellbeing; the child’s preference; the child’s performance, continuity of education, and engagement in the school the child presently attends; the child’s special education programming if the child is classified; the point of time in the school year; the child’s permanency goal and the likelihood of reunification; the anticipated duration of the current placement; and such other factors as provided by regulation of the Commissioner of Children and Families.”

“Improving the Educational Outcomes of Children in Out-of-Home Placements: An Interagency Guidance Manual”²¹

A multiagency state work-group developed and distributed this manual in 2013. The manual includes forms, resources and collaboration model/strategies to be employed by LEAs in collaboration with the Department of Children and Families. It also offers strategies for the state child welfare agency and LEAs to meet goals for educational stability for students in resource center homes as well as strategies for constructing and implementing a memorandum of agreement between school districts and the Department of Children and Families.

The New Jersey Department of Education names the goals for creating educational stability for out-of-placement students as follows²²: “Goal 1: Children remain in their current school when in their best interest. Goal 2: Children enter school ready to learn. Goal 3: Children receive supports and services to participate in all aspects of school and to prevent school dropout, truancy, and disciplinary actions. Goal 4: Children are engaged in their education, are empowered to advocate for their educational needs and pursuits, and receive supports and services to ensure a successful transition into adulthood. Goal 5: Children with disabilities are located, identified and evaluated for eligibility for special education and section 504 services and, if eligible, must receive a free, appropriate public education.”

Every Student Succeeds Act (ESSA)

Due to the expansive policy work started in New Jersey to protect the educational rights of students in foster care, ESSA planning includes the review and examination of internal and existing processes and policies to determine where revisions are necessary to meet new federal requirements.

²⁰ State of New Jersey. (2010). 30-4C-26 Placing child in resource family home or institution. Retrieved August 10, 2016, from <http://www.nj.gov/dcf/documents/divisions/dyfs/304C26.pdf>

²¹ Department of Children and Families. (2013, October 29). Improving the educational outcomes of children in out-of-home placements: An interagency guidance manual. In *State of New Jersey*. Retrieved August 10, 2016, from <http://www.nj.gov/education/students/safety/edservices/stability/outcomes.pdf>

²² State of New Jersey Department of Education. (2014). Educational Stability for Youth in Foster Care. Retrieved August 10, 2016, from <http://www.nj.gov/education/students/safety/edservices/stability/>

New Mexico

Key informant²³: Grace Spulak, Director, FosterEd: New Mexico, National Center for Youth Law

Pre-ESSA Initiatives

In March 2016, FosterEd launched a pilot program in Lea County, New Mexico similar to those launched in California and Arizona. This program sought to build a support structure of an educational champion, education team and education plan for students in foster care and/or the juvenile justice system to advance success and address outstanding educational needs.

In their efforts to protect the educational rights of students involved in foster care and the juvenile justice system, FosterEd is facilitating advocacy and legislative work to ensure state law includes protections for credit transfer and development of sustainable funding for educational liaisons on the state level. Additionally, FosterEd is seeking legislation for the collection of state level data regarding education indicators. They are collaborating with the state child welfare agency, Public Education Department, and Administrative Office of the Courts to develop specific procedures for this data collection.

Pennsylvania

Key informants²⁴: Katherine Burdick, Staff Attorney, Juvenile Law Center and Maura McInerney, Senior Staff Attorney, Education Law Center of Pennsylvania

Legislative Proposals Pending

Companion bills have been introduced in both the House and the Senate establishing various standards and policies to ensure school stability and support students in foster care to graduate. Each of the three bills introduced in each chamber operate in tandem to establish the role and function of courts, child welfare agencies and school districts to ensure school stability. These bills include: HB 1808 (amending the Human Service Code); HB 1809 (amending the Judiciary Act); and HB 1828 (amending the School Code). The Senate bills include: SB 1271 (amending the Judiciary Act, which has passed out of committee and to Appropriations); SB 1272 (amending the Human Service Code) and SB 966 (amending the School Code).

For example, HB 1809 addresses a judge's obligation to determine when a school change is necessary. The language of the bill is as follows²⁵: "The court shall ensure that the child shall remain in the school the child attended immediately prior to placement, unless the court determines that remaining in the same school would be contrary to the child's safety or well being. In making a determination ... the court shall consider the wishes of the parent or other legally authorized education decision maker and, where appropriate, the wishes of the child."

HB 1828 includes a comprehensive amendment to the School Code based on changes to ESSA and requires a designated individual in the State Department of Education to oversee school stability and to collaborate with the State Department of Human Services to develop an interagency agreement.

²³ Personal communication, R. Velcoff Hulst, August 25, 2016

²⁴ Personal communication, K. Burdick & M. McInerney, August 4, 2016

²⁵ The General Assembly of Pennsylvania. (2016, January 27). House Bill No. 1809 Session of 2015. Retrieved August 9, 2016, from <http://www.legis.state.pa.us/CFDOCS/Legis/PN/Public/btCheck.cfm?txtType=HTM&sessYr=2015&sessInd=0&billBody=H&billTyp=B&billNbr=1809&pn=2770>

The interagency agreement responsibilities of the Department of Education in the language of the bill are as follows²⁶: “Collect disaggregated data regarding graduation rates and the academic performance of children in foster care. Assist local education agencies and county children and youth agencies in ensuring school stability.”

Interagency agreement responsibilities of the LEAs in the language of the bill are as follows²⁷: “Assign an individual to serve as a point of contact with the local child welfare agency who shall assist students as described under this section. Disaggregate and report data to the Department of Education regarding the academic performance and graduation rates of children in foster care. Collaborate with county children and youth agencies to implement transportation procedures to support school stability in accordance with this section.” These bills determine who is responsible for transportation costs per ESSA and reflects that the child welfare agency will pay unless the LEA can transfer at no cost.

Finally, SB 966 offers significant amendments to the School Code to ensure school stability and support students in foster care by preventing loss of credits and promoting credit waivers to support timely graduation. The language of the bill is as follows²⁸: “Assist the student’s transition to the new school by determining appropriate class placement and connecting the student with appropriate services and opportunities, including participating in extracurricular activity and vocational and other programs. Work with the student in grades nine (9) through twelve (12) and the student’s parent, foster parent or other educational decision maker and the county children and youth agency to evaluate and document partial and full credits the student has earned and the credits needed to graduate for inclusion in a graduation plan for the student. The documentation shall be maintained in the student’s file. School districts shall honor credits previously earned in any prior educational placement by students experiencing an educational disruption. School districts shall consider waiving local school district requirements for graduation and awarding credit based on alternative methods, such as testing or written work, as determined by the district for students who meet state graduation requirements. School districts shall also offer options to allow students experiencing an educational disruption to make up lost credits. Options may include summer school, after-school or online credit recovery programs overseen by a teacher or other assessments to the extent these options are available within the school district.” Finally, these bills mandate the immediate transfer of school records when students in foster care are transferred to a new school.

Education Liaisons – Child Welfare Agency

Since 2008, Pennsylvania has required each of its 67 County Children & Youth agencies to designate an “education liaison” to support students in foster care and interface with school districts. The liaison receives a formal training on the educational rights of children in foster care and serves as a

²⁶ The General Assembly of Pennsylvania. (2016, February 5). House Bill No. 1828 Session of 2015. Retrieved August 9, 2016, from <http://www.legis.state.pa.us/CFDOCS/Legis/PN/Public/btCheck.cfm?txtType=HTM&sessYr=2015&sessInd=0&billBody=H&billTyp=B&billNbr=1828&pn=2812>

²⁷ The General Assembly of Pennsylvania. (2016, February 5). House Bill No. 1828 Session of 2015. Retrieved August 9, 2016, from <http://www.legis.state.pa.us/CFDOCS/Legis/PN/Public/btCheck.cfm?txtType=HTM&sessYr=2015&sessInd=0&billBody=H&billTyp=B&billNbr=1828&pn=2812>

²⁸ The General Assembly of Pennsylvania. (2015, August 7). Senate Bill No. 966 Session of 2015. Retrieved August 9, 2016, from <http://openstates.org/pa/bills/2015-2016/SB966/>

point of contact for caseworkers who confront barriers to enrollment, school stability, special education services, etc. This position adds specific duties to designated staff, but is not separately funded by the child welfare agency.

As a result of this practice, which has made a significant difference for hundreds of children in foster care, school districts will also designate a “Foster Care Point of Contact” as required under ESSA.

Education Support Center

Both Philadelphia and Pittsburgh have created specific departments within their child welfare agencies to support students in foster care. The Education Support Center in Philadelphia (ESC) responds to hundreds of inquiries each year from caseworkers in need of assistance and works directly with School District of Philadelphia staff to address issues. The ESC recently moved to be co-located in the School District. This center began through the use of private funding, but is now fully funded by the Pennsylvania Department of Human Services. The Pittsburgh counterpart has received national attention and federal funding for its robust data and information sharing with school districts to support students in foster care.

Pending ESSA Recommendations of the Education Law Center of Pennsylvania (ELC-PA)

ELC-PA has recommended Pennsylvania establish an ESSA workgroup specifically for vulnerable populations including but not limited to students who are homeless and students in foster care. ELC-PA has recommended that, when establishing a solution for transportation to support school stability, the state must clearly define what constitutes “additional costs” and encourage and support school districts to investigate no-cost options of utilizing existing bus routes. The state should also designate which agency will pay in cases where there is a disagreement between a child welfare agency and the local educational agency.

Texas

Key informant and editor²⁹: Kelly Kravitz, Foster Care Education & Policy Coordinator, Texas Education Agency

Texas Blueprint (Children’s Commission)³⁰

The Children’s Commission Education Committee was created by a State Supreme Court order in 2010 leading to the release of the Texas Blueprint in March 2012. An Implementation Task Force and Advisory Council were then created to prioritize over 125 recommendations from the Texas Blueprint. After the first two years of implementation, in 2015 the Task Force recommended the creation of,³¹ “a standing foster care and education committee of the Children’s Commission, of a duration to be determined by the Children’s Commission, to meet quarterly, approve education-related initiatives, and monitor progress on collaborative projects; and encourage cross-system, multi-disciplinary, and diverse membership from child welfare, education, youth, and advocacy

²⁹ Personal communication, K. Kravitz, September 12, 2016

³⁰ Texas Blueprint Implementation Task Force. (2015, February 27). Texas Blueprint Implementation Task Force final report. In *Texas Children's Commission*. Retrieved August 5, 2016, from <http://texaschildrenscommission.gov/media/2505/TX-Blueprint-Childrens-Comm-Final-Report-FINAL-330pm-022415.pdf>

³¹ Texas Blueprint Implementation Task Force. (2015, February 27). Texas Blueprint Implementation Task Force final report. In *Texas Children's Commission*. Retrieved August 5, 2016, from <http://texaschildrenscommission.gov/media/2505/TX-Blueprint-Childrens-Comm-Final-Report-FINAL-330pm-022415.pdf>

stakeholders.” The Children’s Commission created a standing Foster Care & Education Committee in February 2015. At present, the committee oversees four workgroups: Data, Postsecondary Education, Local Collaboration and Special Education.

Actions of the State Education Agency

Texas Education Agency (TEA) hired a full-time Foster Care Education & Policy Coordinator in 2012 to provide technical support, coordination and brokerage for the various agencies and infrastructures involved in promoting education parity and opportunity for students in foster care. This staff person is responsible for participating in the implementation of the Texas Blueprint, and coordinating activities within TEA and the broader education system to build capacity at the state education level, provide training and technical assistance, leverage existing systems for services and resources, and coordinate across program and service areas to ensure appropriate and efficient delivery. TEA has emphasized it is critical this be a full-time position at the state education agency in order to acknowledge challenges, gaps and opportunities to wholly serve students in foster care. This is on-going work at TEA and will be continued with the implementation of ESSA.

Foster Care Liaisons³²

As of the 2014-2015 school year, all LEAs are required to appoint a foster care liaison. The liaison’s contact information is then required to be recorded in the public database “AskTED”. Additionally, each Education Service Center has Voluntary Foster Care Champions who advocate for local training, answer questions pertaining to students in foster care and support the local school district. Their contact information is similarly made available through the Texas Education Agency website.

Vermont

Key informants³³: Patrick Halladay, ESSA Program Manager, Vermont Agency of Education; Deb Quackenbush, General Supervision & Monitoring Division Director, Vermont Agency of Education; Alicia Hanrahan, Education Program Manager, Vermont Agency of Education

Fostering Connections Act of 2008

Following the enactment of the Fostering Connections Act, Vermont passed a state law that allowed students to remain in their schools of origin if they chose to do so beginning with the 2009-2010 school year. This has been achieved through memorandums of understanding (MOUs) with LEAs, but is not a statewide requirement. Vermont Agency of Education reports relative success of the MOUs, though comprehensive data is not available.

Educational Liaisons

Vermont does not employ a legal requirement for educational liaisons to link LEAs and child welfare agencies; however, the Vermont Agency of Education employs a state level interagency coordinator who regularly corresponds with the Department for Children and Families.

Every Student Succeeds Act (ESSA)

Though still in the planning stages for the implementation of ESSA, the Department for Children and Families has committed to designate points of contact for the child welfare agency. The Vermont Agency of Education plans to facilitate conversations with LEAs in September and

³² Texas Education Agency. (n.d.). Foster care & student success - Texas school foster care liaisons. Retrieved August 15, 2016, from <http://tea.texas.gov/FosterCareStudentSuccess/liaisons/>

³³ Personal communication, P. Halladay, D. Quackenbush & A. Hanrahan, August 23, 2016

October 2016 in order to discuss new requirements under ESSA. Furthermore, they intend to create joint guidance with the Department for Children and Families to ensure consistency between the two state agencies. The state intends to increase data tracking, but has not made decisions regarding this as of the key informant interview on Aug. 23, 2016.

West Virginia

*Key informant³⁴: Melanie Purkey, Executive Director, Office of Federal Programs,
West Virginia Department of Education*

Every Student Succeeds Act (ESSA)

Prior to ESSA, children “awaiting foster care placement” were covered under the McKinney-Vento Act. Children residing in foster care received the same provisions for enrollment and services. Transportation was covered under McKinney-Vento, but rarely used because of the challenge created by the rural environment of West Virginia (often a 1.5 hour drive each way for students moved out-of-county). At the time of the Aug. 8, 2016 key informant interview, a POC had been established at the state child welfare agency.

The key informant also reported plans for a Stakeholders Meeting in August to draft guidance for the agreements between LEAs and local child welfare agencies. West Virginia has set a state deadline of mid-September for establishment and dissemination of the guidance. The guidance will include provisions for the school placement determination process, transportation agreements and strategies for facilitating the transaction between LEAs and child welfare agencies regarding transportation costs. In addition, the guidance will include a requirement that LEAs establish POCs and agree to terms with the child welfare agency regarding school placement determination and transportation by the December 10 federal implementation deadline. West Virginia is currently collecting data to determine the cost of ESSA provisions, but has not arrived at an amount.

Wisconsin

*Key informant³⁵: John M. Elliott, Deputy Administrator, Division of Safety & Permanence,
Department of Children and Families*

Foster Connections to Success and Increasing Adoption Act of 2008 – Wisconsin Statutes

The Wisconsin Statutes for the Fostering Connections Act require collaborative action between the child welfare agency and school district. According to a memo from the Wisconsin Department of Children and Families³⁶, “...an agency placing a child in a foster home, group home, or shelter care facility approved under Section 938.22(2)(c) or in the home of a relative other than a parent, must notify the clerk of the school district that a child has been placed out of his/her home.”

“Educational Services for Children Placed in Foster Care”

This was a joint publication by the Department of Children and Families and the Department of Public Instruction. This publication was the impetus for collaborative action such as data sharing agreement, data analysis to better understand students in foster care and their educational

³⁴ Personal communication, M. Purkey, August 8, 2016

³⁵ Personal communication, J. Elliott, August 4, 2016

³⁶ Bove, F. (2015, September 3). Education information sharing. In *Wisconsin Department of Children and Families*. Retrieved August 11, 2016, from <http://dcf.wisconsin.gov/memos/infomemos/DSP/2015/2015-14.pdf>

characteristics, and plans for the development of an education “portal” to provide child welfare staff access to school records.

Caseworker Desk Guide

This is a resource for child welfare staff to collaborate with school districts, specifically in regards to information sharing. The aforementioned publication states³⁷, “The guide includes a school enrollment checklist, federal and state laws regarding information sharing between child welfare and educational agencies, information on the Education Passport, information sharing best practices, and links to national resources.”

Education Passport

A Department of Children and Families memo regarding the Education Passport states the following³⁸: “In the fall of 2014, DCF designed a new page in eWiSACWIS to collect information for the purpose of generating an Education Passport form. The Education Passport became functional in eWiSACWIS in June 2015. The form supports increased communication to schools, allowing workers to print out education information and give it to a child’s school. The form includes demographic information, school information, child welfare agency information, parent(s)/guardian(s), custodian(s) information, out of home care provider information, and narrative questions to support school success...”

Opportunities for States with Every Student Succeeds Act Implementation

Through the development of ESSA implementation plans, states have an opportunity to include strategies to further protect the educational rights of students in foster care, and improve their academic outcomes.

Following the examples of California, Pennsylvania and Texas, states should place educational liaisons in child welfare agencies. Liaisons should be directly linked to a point of contact at each local education agency. The educational liaison should be a unique position and not additional duties assigned to an existing staff member. The contact information for all educational liaisons should be made easily accessible to school personnel and child welfare staff. All foster parents, educational decision makers, biological parents and other stakeholders in students’ success, as needed and appropriate, should be provided contact information for their child’s assigned educational liaison when appropriate.

Following the example of Wisconsin, states should develop a system for interagency information sharing between the child welfare agencies and school districts. This should be easily accessible to appropriate school personnel and child welfare staff within the parameters of the Family Educational Rights and Privacy Act and the Health Insurance Portability and Accountability Act. This should include contact information for foster parents, educational decision makers, social workers, involved school personnel (i.e. guidance counselor) and biological parents when appropriate.

³⁷ Bove, F. (2015, September 3). Education information sharing. In *Wisconsin Department of Children and Families*. Retrieved August 11, 2016, from <http://dcf.wisconsin.gov/memos/infomemos/DSP/2015/2015-14.pdf>

³⁸ Bove, F. (2015, September 3). Education information sharing. In *Wisconsin Department of Children and Families*. Retrieved August 11, 2016, from <http://dcf.wisconsin.gov/memos/infomemos/DSP/2015/2015-14.pdf>

Involved agencies should include the following as criteria for the “best interest” decision:

- Preference of the child and parents
- Placement of any siblings
- Special academic/support needs of the child
- Number of school transfers and
- Effect of a commute on the child’s personal and academic well-being

A “best interest” decision should be made within ten days of the student’s new home placement.

State agencies should assess processes in place for school stability and placement proximity and explore future collaboration to utilize placement options close to schools and avoid separating the child from their community as much as possible.

The ESSA planning and implementation process gives states a chance to review existing practices and policies, identify and employ new strategies, and change ways of supporting different subgroups. As experiences from other states highlight, unique opportunities exist to strengthen efforts to support children involved in the child welfare system, and to change their academic trajectories.

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Illinois State Board of Education
100 West Randolph Street
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Chicago, Illinois 60601

Dear Superintendent Smith:

Thank you for the opportunity to provide comments on the draft Every Student Succeeds Act implementation plan for Illinois, and for the inclusion of afterschool programming in the plan. There are many ways that the role of afterschool providers could be expanded in this plan to help Illinois' students and schools, particularly in regards to improving academic outcomes, collecting meaningful data, promoting family engagement, expanding funding opportunities for afterschool programs, and using afterschool programs as partners.

Citizen Schools Illinois partners deeply with Chicago Public Schools to deliver high-quality, well-rounded expanded learning opportunities by extending the school day and providing engaging programs outside of regular school hours. Our partnerships include a program model embraced by school districts and communities, including local civic and corporate leaders. We recognize, alongside the teachers, administrators, and parents with whom we work, that all students—regardless of income, racial or ethnic background—should have access to engaging core academics and enrichment that includes real-world opportunities and mentorship that can help shape their vision for their lives, and help them develop needed academic and social-emotional skills.

We are committed to deep partnerships between schools, community organizations, and parents so that the academic and enrichment activities, school redesign, and teacher support that we provide will support educating the whole child to ensure all students have equitable opportunities to meet the challenging standards set forth by the state. We are committed to evaluation, continuous improvement and high standards for student learning. These goals are achieved in part through robust selection and training programs for our staff and volunteers. All of our expanded time programs serve low-income communities.

Citizen Schools Illinois is excited about the opportunities in ESSA to create better connections between school-day and afterschool professionals. We ask that the Illinois State Board of Education (ISBE) take advantage of the opportunities available to increase and improve afterschool programming in the implementation of ESSA, and we encourage the state to work as closely as possible with afterschool providers in constructing its plan. We ask that ISBE consider the following suggestions for the Illinois state plan.

Improving Academic Outcomes:

Afterschool programming has been proven through research to improve youth outcomes and should be used as a strategy for improving schools and academic achievement. Disadvantaged students who have participated in Citizen Schools' programs have graduated from high school¹ and advanced to college at rates that dramatically exceed the norm for their districts.² Students enter Citizen Schools with test scores, attendance rates, and academic performance that are below average for their urban districts; but, after completing the Citizen Schools program, they outperform their peers significantly on each of these measures.³ Our experience is part of a growing body of evidence showing significant positive outcomes for participants in other high-quality expanded learning time programs such as College Track, the Higher Achievement Program, BELL, Experience Corps, Horizons National, Spark and the Breakthrough Collaborative.

Regarding the school improvement indicators suggested by the Accountability Workgroup (Section 3.1, page 15), we recommend that ISBE consider the addition of access to afterschool programs, access to mentors, access to project-based and experiential learning, and access to college and career exploration. High-quality afterschool programs address many of the indicators listed in the non-academic indicators and should be added as a separate indicator.

We are very pleased to see the strong language in the draft plan in favor of social-emotional learning and college and career readiness, and we suggest that the proposed school climate and academic indicators also incorporate indicators of student motivation to learn, such as growth mindset. Furthermore we would suggest measures that assess 21st Century Skills that are essential for college and career readiness such as collaboration, innovation and teamwork.

Importance of Middle School:

Neuroscience research demonstrates that crucial brain development occurs during adolescence, making middle school a critical time to engage students and set them on a path for successful transition to high school and beyond. Middle school students need to develop strong interpersonal and academic skills as a foundation for higher-level critical thinking and skill development in high school. Therefore, we applaud ISBE for including an indicator for 8th/9th grade transitions.

¹ Arcaira, Erikson, Juliet D. Vile, Elizabeth R. Reisner. Achieving High School Graduation: Citizen Schools' Youth Outcomes in Boston [Final Report]. August 2010.

² Citizen Schools. Citizen Schools College Success Report. 2015.

³ Policy Studies Associates Evaluation (2001 - 2010): Citizen Schools engaged Policy Studies Associates (PSA) to conduct a rigorous longitudinal study of its Boston program from 2001 to 2010. This study found that the program engaged students who were at greater educational risk than district students overall prior to enrolling in Citizen Schools (Arcaira, Vile, and Reisner 2010). In addition, based on a comparison with matched peers, PSA found substantial evidence of statistically significant positive impacts on students' engagement in school, achievement, and graduation. <http://citizenschools.wpengine.netdna-cdn.com/wp-content/uploads/2011/01/PSA-Citizen-Schools-Youth-Outcomes-in-Boston.pdf>

Access to high-quality academic and enrichment programming for middle school students should be an important focus for states and districts to ensure that 8th graders are on track to successfully transition to 9th grade. Studies show that attendance, grades, test scores, and behavior during the middle grades all predict students' performance in high school—and their odds of graduating. When students participate in programs like Citizen Schools, they benefit from immediate gains in core academic skills and self-confidence, which translate into increased success in high school. We ask that ISBE consider adding language in Section 5.1 (page 41) on middle school interventions that support successful transitions to high school and reduce the risk of students dropping out.

Data:

In response to ISBE's question in the plan in Section 3.1 regarding what other data the state should include in the reporting system, we suggest that ISBE collect and report on data that reflects not only school culture and climate (as reflected in ISBE's examples listed on page 17 and 18), but also would suggest exploring a measure that incorporates student-level Social Emotional Learning (SEL) that focuses on student perceptions on achievement (such as growth mindset) or key 21st Century Skills such as teamwork, collaboration, or innovation. There is a growing awareness among educators and policymakers about the importance of social and emotional development for successful student performance, school engagement and college and career success, all of which are aligned to ISBE's vision for student success. Furthermore, these types of SEL measures would add more depth and dimension to ISBE's robust academic measures and cohort graduation rates and provide a more holistic picture of student performance and the skills needed to be prepared for the 21st century economy.

Family Engagement:

Afterschool programs provide a crucial bridge between communities and schools and can help foster the family engagement called for under ESSA. Out-of-school time programs can assist in students' transitions throughout their schooling because these programs often have strong, consistent parent and community ties. Citizen Schools focuses on supporting partner schools with family engagement through community building events. For example, each semester culminates with a WOW!, an event where students and volunteer professionals showcase the projects they created during their semester-long apprenticeships. This is an event where family and the community come together to celebrate the accomplishments of the students and also have the opportunity to engage with the professionals from local businesses that are volunteering in their schools. Citizen Schools' staff also communicate with families about student academic progress and areas of social-emotional growth on a bi-weekly basis.

We further applaud ISBE's decision to include the use of Title IV, Part B (Section 5.1 part E, page 52) funds to build the capacity of subgrantees as they implement high-quality afterschool and family programs. We also want to note that ESSA's provisions on Parent and Family Engagement in

Title I Part B call on education agencies to collaborate with community-based organizations, such as afterschool programs, to carry out parent engagement plans and in using its parent engagement funds. We encourage ISBE to partner with afterschool programs in using these funds.

Funding:

Because afterschool is such an integral part of educational improvement, we encourage ISBE to use the opportunities present in ESSA to make investments in afterschool to support crucial programs in Illinois. Afterschool is included as an allowable use of Title I and in allocating funds set aside for school improvement. We ask ISBE to encourage that funds be allocated to afterschool when planning for school improvement in Section 3.3, part A of the plan.

As part of the Direct Student Services program (Title I Part A: Sec 1004), states can reserve up to 3% of Title I funding for services targeted to LEAs identified for comprehensive supports (which receive first priority for funds) or targeted supports (which receive second priority) and for individual low-income students (if funding remains) and improvements to pay costs that help students engage in classes not offered by the school in advanced or career coursework or which offer a personalized learning approach including “high-quality academic tutoring”. We ask ISBE to participate in direct student services and focus funds on high-quality afterschool programs that provide academic tutoring and career coursework.

In addition, the Targeted Assistance to Schools (Title I Part A: Sec. 1009) focuses on helping eligible children meet the challenging State academic standards, which may include programs, activities, and academic courses necessary to provide a well-rounded education by “(B) using methods and instructional strategies to strengthen the academic program of the school through activities, which may include—(i) expanded learning time, before- and afterschool programs, and summer programs and opportunities”.

In regards to ISBE’s request for additional ways it can consider the use of Title IV, Part A funds, (Section 5.1, page 56) we suggest ISBE consider opportunities for STEM learning and college and career readiness in afterschool. ESSA places an emphasis on STEM learning, an area in which afterschool programs can provide hands-on, project-based opportunities for students to advance. To allow for the level of exposure and experiences needed to develop a deep understanding of STEM subjects, we must ensure that all communities offer multiple and varied ways for students to engage with these subjects, including afterschool programming. Title IV, Part A specifically mentions that funds may be used to “facilitate collaboration among school, afterschool program,

and informal program personnel to improve the integration of programming and instruction in the identified subjects⁴ (Sec 4107 (a)(3)(C)(v)).

Afterschool programs also offer opportunities to expose students to higher education options and career pathways and to teach skills that can unlock doors to future career prospects. The afterschool hours offer time for apprenticeships, guest speakers, and project-based activities that are not always available during a school day focused on a core curriculum. The state's ESSA plan can use afterschool to reach ESSA's college and career goals.

Although it was not mentioned in ISBE's plan, Title II Part B of ESSA provides grants to "develop or enhance comprehensive literacy instruction" to entities serving "children from low-income families." ESSA specifically states that these literacy initiatives can be "augmented by after-school and out-of-school time instruction." ISBE should take advantage of these opportunities to improve the literacy of high-need populations by coordinating literacy initiatives between in-school and out-of-school time partners.

In conclusion, the implementation of ESSA provides Illinois with the opportunity to create a comprehensive vision for student success. In implementing ESSA, we hope that ISBE works to coordinate services for young people so that they have everything they need for success, including academic supports that are coordinated with community partners that provide services to promote health, safety, and mentoring. These things can be accomplished by greater partnerships between school and out-of-school time programs. Afterschool programming is critical to success for students, and we hope ISBE capitalizes on the benefits offered by afterschool programming to the maximum extent possible in its implementation of ESSA. If we can provide you with further information, please contact me at jeanettecastellanos@citizenschools.org or my colleague Roxanne Garza at roxannegarza@citizenschools.org.

Thank you,

Jeanette Castellanos Butt
Executive Director
Citizen Schools Illinois

⁴ Well-Rounded Education Sec. 4107 (at least 20% of funds) including the arts, computer science, advanced coursework, career counseling. The section has a large focus on STEM including –supporting students in STEM competitions, promoting hands-on STEM learning

Community Consolidated School District 46



565 Frederick Road • Grayslake • Illinois • 60030 (847) 223-3650 FAX (847) 223-3695

October 7, 2016

To Whom it May Concern:

Response to ESSA and ACCESS Scores (3.1 Accountability System: pgs 14-16)

Response to ESSA and the proposed changes to Title III funding (Section 8201(b)(2)(I). 9)

There are many items to take into consideration when acknowledging the changes that ESSA brings to Title III and ELs. It is difficult to begin to offer constructive feedback until the department makes its' final determination regarding the measurable definition of "*progress in language proficiency*". Based on what we are understanding from state-wide conferences and attending a listening tour, there is a great possibility that the definition will include growth, AMAO 1, and/or attainment, AMAO 2.

Moving forward with the mindset that the definition will include aspects of AMAOs 1 and 2, it would be important to consider what the Common Core is asking of students in each grade level. Creating a crosswalk which compares the language proficiency level of students in each domain aligned to the rigor of the common core would help to determine an attainable cut of score for ACCESS 2.0. Cut off scores could be used to set targets for students across the language acquisition continuum. A growth to target mindset would incorporate AMAOs 1 and 2 (Growth and attainment) and time. For example, if a student starts at level one and were allowed five years to obtain proficiency, using the growth to target model attainable language proficiency goals can be set for this student.

Regarding the ACCESS test and exit scores, an increase in the exit criteria will be necessary to ensure that students not only meet proficiency in English in comparison to their monolingual peers, but maintain proficiency. Research by Thomas and Collier (2015) is showing that students who meet exit criteria (on the ACCESS test) in third grade are able to maintain academic success with their monolingual counterpart until middle school and high school, when the achievement gap widens significantly.

A manner to begin to remedy this problem is to take a closer look at the current ACCESS Exit criteria. Some suggestions would be to ensure that the exit criteria for kindergarten does not apply, and give the students at least two years in the program. The data from the ACCESS test can be used to measure growth between kindergarten and first grade.

Another change to the exit criteria would include only allowing students to exit on a Tier C with a composite of 5.0, and obtaining at least a 5.0 in reading and writing.

The proposed changes would ensure that the students would be more prepared in all four domains to exit the EL program and have fostered the skills and strategies needed to be a successful student who is college and career ready.

Title III funding Folded into Title I Section 8201(b)(2)(I). 9

Another area that which requires feedback is the idea to fold Title III into Title I.

The proposed changes to Title III may create some potential problems with ensuring that ELs receive the funding that is allocated to the EL Department. When this change was brought up at the Statewide directors meeting for Linguistically Diverse students, an audible gasp ran through the crowd. Ensuring that EL students receive the funding that they deserve may pose to be a challenge. It will be exceptionally difficult in areas where one administrator holds the role of director in various departments. A number of safeguards will need to be put into practice to ensure that designated funding be used and spent in the area for which it is allocated. ESEA Section 8201(b)(2)(I). 9(2015) states; educational Agency (SEA) Title I staff should work together with Title III staff to ensure a coordinated approach to serving ELs in the State. This statement will need to be defined and expanded to indicate how each team will work together. It should go on to explain, how the funds be allocated, the procedure for designating, and spending funding appropriately, and most importantly a checks and balance system. A great deal of apprehension is created with the proposed funding changes for Title III.

We appreciate the ability to provide our feedback to you regarding the proposed changes. It is difficult to fully appreciate the impact of these proposed revisions to past practices as outlined in the ESSA expectations when clarity and a full understanding by the state agencies and district staff is not currently available. Our district has actively participated in the Title I and Title III Director's Fall Conferences and have attended the Listening Tours in order for us to have the knowledge of the upcoming changes. We welcome the opportunity to discuss these issues with you in more detail as needed. We can be reached at (847) 543-5322.

Sincerely,



Dr. Stephanie Diaz
EL Director



Paul Louis
Assistant Superintendent

Community Consolidated School District 46 will provide an educational environment that maximizes the potential of ALL students to be prepared for life's opportunities while developing a lasting appreciation for learning.

Teaching, Learning and Assessment

Community Consolidated School District 46 will provide an educational environment that maximizes the potential of ALL students to be prepared for life's opportunities while developing a lasting appreciation for learning.

CCADE

COUNCIL OF
CHICAGO AREA
DEANS OF EDUCATION

October 7, 2016

Tony Smith, Ph.D.
State Superintendent of Education
100 North First Street
Springfield, Illinois 62777-0001

Dear Dr. Smith:

On behalf of our member deans, we are writing to communicate our strong support for strengthening the quality of teaching and learning in Illinois schools by enabling districts to use Title I and Title II funds to support well-designed, year-long, pre-service co-teaching placements, popularly known as “teacher residencies.”

As you may recall from your meeting with us last year, CCADE consists of over 25 Chicago area deans of education. Our deans come from private and public institutions, and lead highly effective, university-based educator preparation programs that are deeply committed to data-based decision-making and programmatic innovation. In the 2015-2016 academic year, CCADE member institutions prepared over 1,000 student teachers who passed the edTPA and earned Illinois teacher licensure. Approximately 27% of these program completers identified themselves as minority.

At a recent meeting, CCADE member deans identified the recruitment, retention, and graduation of more diverse teacher candidates as a top priority. In our view, encouraging the use of Title I and Title II funds to support well-designed teacher residency programs will significantly help us and the State of Illinois to attract more diverse teacher candidates to the teaching profession. As I am sure you are aware, Illinois’ educator workforce does not align with the racial demographics of its students, and these disparities are not improving (King, Kan, and Aldeman, 2016). On the other hand, teacher residency programs demonstrate the capacity not only to attract more diverse teacher candidates, but also to significantly impact student learning and teacher retention—especially in schools with low-income students and high teacher turnover rates (Guha and Kini, 2016). In addition, teacher residency programs provide support for school and district improvement by valuing the professional expertise of current educators, developing current teachers’ skills as mentors and teacher leaders, and building more collaborative school communities (Guha, Hyler, and Darling-Hammond, 2016).

While our member deans stand ready to support the development of residency programs in the Chicago area—in fact, some of our deans have already taken the lead in this regard—we collectively face significant funding and partnership limitations that hamstring our capacity to implement and sustain these programs at the rate that is needed. Consequently, we strongly urge you to accelerate educator preparation innovation and partnership by explicitly incorporating

teacher residencies into the Illinois' ESSA State Plan as an allowable and encouraged use of federal funds.

Thank you for the opportunity to provide feedback on the emerging Illinois' ESSA State Plan. We look forward to working with you and others across the state and the Chicago region to create new and effective pathways for making real access to opportunity available to our most vulnerable students and communities.

Sincerely,

Tom Phillion, CCADE Co-Chair
Roosevelt University

Terri Pigott, CCADE Co-Chair
Loyola University Chicago

CC: Carol Rozansky, Columbia College Chicago
Kevin Brandon, Concordia University Chicago
Paul Zions, DePaul University
Therese Hogan, Dominican University
Paul Busceni, Kendall College
Rachel Ragland, Lake Forest College
Pam Jessee, Lewis University
Robert D. Muller, National Louis University
Rebecca L. Nelson, North Park University
Sandra Beyda-Lorie, Northeastern Illinois University
Laurie Elish-Piper, Northern Illinois University
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Larry Sondler, School of the Art Institute of Chicago
E. Suzanne Lee, St. Xavier University
Karen Wrobbel, Trinity International University
Rhoda Mattson, Trinity University
Aginah Muhammad, University of Illinois at Chicago
Paul Egeland, Wheaton College

To: Dr. Tony Smith, State Superintendent of Education

From: Acasia Wilson Feinberg, Executive Director, E4E-Chicago

Subject: Comments on ISBE Draft ESSA Plan

Date: September 30, 2016

As a teacher-led organization, we strongly urge you to consider the voice of teachers in developing Illinois' ESSA plan. Teachers are not only a required stakeholder for input gathering under the law, our professional expertise and classroom perspectives will be invaluable as our state designs the measures, programs and supports that have the potential to positively impact our classrooms and careers for many years to come.

Educators 4 Excellence-Chicago's more than 3,200 members are part of a quickly growing national network of 20,000 educators. E4E members learn about education policy and research, network with like-minded peers and policymakers, and take action by advocating for teacher-created policies that both lift student achievement and the teaching profession.

Over the last two years, E4E-Chicago members authored two policy papers after reviewing best practices, conducting local research and gathering feedback. Their recommendations on how to improve [teacher evaluations \(2016\)](#) and professional development (2015) inform our comments on the draft ESSA plan for the State of Illinois.

First, we focus on Section 4.2, which outlines how the SEA will use Title II, Part A funds to increase the quality and effectiveness of teachers. Specifically, we recommend better alignment between teacher evaluation data and targeted professional development. Additionally, we support the use of effective teachers as mentors for delivering professional development to their colleagues. The bolded text shows our recommendations.

(Section 4.2) Support for Educators

Resources to Support State-level Strategies:

- (p. 35) Content experts should provide support for these resources through professional development opportunities **that are aligned with teacher evaluation results.**
- (pp. 35-36) Districts, especially those identified for comprehensive services, should be provided professional learning opportunities that include strategies regarding leadership, learning communities, data, outcomes, resources, learning design, implementation, and recruitment and

retention of teachers in high-poverty and/or high-minority districts, which may be delivered **through mentoring from effective teachers working in a hybrid teacher-leader role.**

- (p. 36) This professional learning should **be aligned to teacher evaluation data and will** improve the quality and effectiveness of teachers, principals, and administrators and improve student academic achievement.

We also recommend that the following suggestions be incorporated into the plan to more strongly link teacher evaluations with appropriate and targeted professional development. Aligning these two components of teacher development in the state plan will ensure that teachers are, in fact, supported to improve in the domains they need the most:

- ISBE should mandate that districts align their definition of "professional development" with the domains and indicators in the teacher evaluation system.
- ISBE should require districts to analyze the degree to which the professional development offered is aligned with teacher evaluation results and the domains in which teachers in these schools need support.

In addition to our comments from E4E-Chicago's Teacher Policy Teams, we also submit comments based on responses from more than 100 teachers via surveys and focus groups.

(Section 3.1) Accountability system

School quality measures (p. 15):

- Our teachers overwhelmingly suggested using social-emotional learning indicators or a school climate indicator as the additional indicator of student success for the state accountability system.

(Section 3.3) State Support and Improvement for Low-performing Schools

Evidence-based interventions (p. 30):

When asked what kinds of supports or interventions the state should provide schools identified for improvement, some common themes were that the state should provide:

- More modeling to explicitly show educators what is expected and coaching on how to go about implementing those expectations.

- Additional staffing, resources, programs, and school-based interventions.
- Funding and support for teacher-led professional development.

(Section 4.1) Systems of Educator Development, Retention, and Advancement

Our Teacher Action Team for Teacher Diversity engaged 68 teachers through seven focus groups to create policy recommendations to increase teacher diversity and retain teachers of color in Illinois. We believe that the educator development portion of Title II is an opportunity to include measures that would help recruit, develop, and retain teachers of color.

- (p. 34) With regard to “All approved educator preparation programs,” we recommend that ISBE adds a requirement for approved programs to demonstrate courses or trainings that use culturally relevant pedagogy.

(Section 4.3) Educator Equity

Definitions (p. 39)

- With regard to defining “ineffective or inexperienced” teachers, our members recommended that the state use multiple measures to determine a definition of “effective,” including student growth. Additionally, teachers suggested looking at teachers’ demonstrated cultural awareness during teacher observations if it is not already part of an existing teacher evaluation system.

Title II Funding Option for States

Lastly, ESSA provides opportunities for state Chiefs to use Title II funding in innovative ways to help improve teacher and leader quality and ultimately increase student success. As such, our members recommend Illinois to use optional funds for competitive grants that promote teacher leadership.

- (pp. 35-36) ISBE should opt to reserve the 3% of overall funds for statewide activities for competitive grants around innovative teacher leadership roles and teacher-led professional development in schools.

Thank you for partnership and we hope you will continue to encourage teachers to give input in the Illinois State ESSA plan.

--

Acasia Wilson Feinberg | Executive Director
Educators 4 Excellence-Chicago

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E4E.org

Educators  Excellence



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Comments on Illinois' Every Student Succeeds Act Draft Plan

Submitted by Abbey McLaren, on behalf of Generation All

October 7, 2016

Generation All was founded as a partnership of The Chicago Community Trust, Chicago Public Schools and the Chicago Teachers Union, with support from the Ford Foundation. Since the fall of 2014, Generation All has worked with a diverse steering committee to expand equity in education by revitalizing our city's high schools so that all students experience a top quality education both in and out of the classroom. Our goal is ambitious—but achievable—if we tap into the ingenuity, energy and hardworking spirit that make Chicago great.

We envision a city in which:

- Chicagoans recognize that educating all of our children is a shared responsibility necessary for all students to reach their potential so that our city can thrive.
- Neighborhoods are anchored by top-quality public high schools that have the active support of the wider community.
- All public high school students graduate and are prepared to become engaged, educated and capable adults—contributing to the vitality of their families and communities, our city and the world.

Generation All views ESSA as an opportunity to shine a light on the challenges that our most vulnerable populations face. Issues such as race, segregation, and inequitable distribution of resources permeate the city of Chicago in addition to the state of Illinois. The effects are real – with disproportionately negative outcomes for low-income and minority populations.

In order to ensure that Chicago and Illinois address barriers to education and economic opportunities for its residents, Generation All believes that we should have a vibrant public education system, starting with strong neighborhood high schools. Strong neighborhood public high schools can disrupt disparities by providing high-quality learning opportunities for students both in and out of the classroom, grounding them in their communities and connecting them to the wider world. Strong neighborhood high schools also increase neighborhood cohesion, helping to build stable, safe and vibrant communities.

It's time for a sustained, coordinated, city and state wide effort to give all of our young people a chance to reach their potential and to contribute their skills and talents to the life of our communities and the prosperity of our state.

Section 1: CONSULTATION AND COORDINATION

No Comments

Section 2: CHALLENGING STATE ACADEMIC STANDARDS AND ACADEMIC ASSESSMENTS

No Comments

Section 3: ACCOUNTABILITY, SUPPORT, AND IMPROVEMENT FOR SCHOOLS

3.1 ACCOUNTABILITY SYSTEM

ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators (e.g., why a particular indicator makes/does not make sense within an accountability system). (Page 17)

Recommendation

Consider as part of the non-academic school quality indicator an offering of a wide range of extracurricular and out-of-school activities such as sports and clubs, which develop students' passions and leadership skills. Measuring the percentage of students engaged in after school or extracurricular activities may be fairer than recording the number of activities offered, especially if the school is small.

In addition to the percentage of students participating in extracurricular activities, consider creating a diversity index as part of a non-academic indicator. According to the Shanker Institute, "School diversity could be incorporated as this fourth measure, allowing states to both measure progress in this area and reward schools and districts that make strides towards increased diversity by race and/or income by showing marked improvement toward matching the school-age demographics of their metropolitan area."

Source: <http://www.shankerinstitute.org/blog/holmefinnigan>

Overall, Generation All agrees with the list of non-academic indicators put forth by the Accountability Workgroup.

On using socio-emotional learning as part of an academic indicator:

Recommendation

Review the field guide developed through the Susan Crown Exchange (SCE). It can be found here: <https://www.selpractices.org/resources> and contains promising practices in the emerging field of socio-emotional learning.

Another great resource can be found through the University of Chicago Consortium on School Research Foundations for Young Adult Success report. It can be accessed here: <https://consortium.uchicago.edu/sites/default/files/publications/Wallace%20Report.pdf>

On using teacher retention/engagement as part of an academic indicator:

Recommendation

Given the extra challenges that accompany high-poverty communities, schools in these communities may be disproportionately affected negatively by these criteria. Although teacher-retention and engagement are important, perhaps weighting them lower than other indicators can be a way to account for these extra challenges.

Conclusion

While the proposed indicators for accountability appear evidence-based and well-meaning, a word of caution in holding all schools, especially school in high-poverty communities, equally accountable to these indicators. For example, a small school on Chicago's south side may only enroll 200 students but because of student-based budgeting throughout Chicago Public Schools, that school will not have the funds to provide an array of AP/IB classes in addition to an array extracurricular activities. Therefore, we must question how ISBE is going to reconcile these disparities among schools within a district as large as CPS. Because CPS is the largest school district in Illinois, we encourage ISBE to consider working closely with district leaders to account for and take these challenges into consideration.

ISBE requests ideas from individuals or groups regarding the two examples of weighting (e.g., comments on these examples, issues such as the example identified by the Accountability Workgroup, and other, different possibilities of indicators and weighting). (Page 19)

Recommendation

Example two on page 18 places more weight on 8th/9th grade on-track indicator which has been proven to increase high school graduation rates. Generation All prefers Example Two because it better accounts for the significance of that indicator.

ISBE requests feedback on the relationship between long-term goals that are ambitious and achievable and long-term goals that are aspirational. (Page 19)

Recommendation

Generation All understands the tension between moving the needle on student outcomes and putting in place the right policies that will enable the system to achieve desirable outcomes in the future. While it is important to boost student success as quickly as possible, it is even more important to ensure the Illinois public education is supported in ways that provide a high quality experience for all students, teachers, parents, and communities alike.

Families need open, guaranteed access to a high quality education with the wider support from the surrounding community and sometimes that takes time. For example, simply opening a new charter school near an underperforming school will not support the students at that underperforming school. The state must recognize and support the institutions it currently has – since there really are no quick fixes. It can take at least five years for districts to see movement in long-term goals such as increased graduation rates. We caution the district against rapidly increasing the number of charter schools without a full understanding of the impact of these new schools on existing district-run schools.

One way to prioritize long-term goals is to start with equity. Begin focusing on schools that need the most support to see positive movement across the state. Also, keep in mind that goals need to be achievable, as defined by the district, so that the resources in the system work towards meeting them. For example, ensuring every student has access to a college advisor can be accomplished within one year.

ISBE requests feedback on the following additional questions relevant to the development of an equitable accountability system: (Page 21)

- How might a system avoid the “bubble syndrome,” which focuses on students who are most likely to meet standards instead of those who need additional supports to meet standards or who are at the higher end of the spectrum?

Generation All agrees with concepts put forth by the Federation for Community Schools:

Recommendation

We agree that engaging parents of students on the cusp and using them as a resource is one way to avoid the bubble syndrome. Urging districts to set aside funds specifically for parent engagement activities would help schools conduct these activities. We also agree that engaging those student subgroups to analyze school-wide data and take part in school improvement decision-making is a promising way to learn more about their needs, providing an opportunity for districts to implement policies that help those students.

Schools should also publically report on the variance in student outcomes and on the growth of all student subgroups over time. This would help identify areas where students need assistance.

- *What is necessary in order to develop a system that addresses disparities in funding and resources (state, local, federal)?*

Recommendation

All public schools, including charter schools, need to report their financial information so the public, legislators, and the community can have a clear understanding of the current funding disparities.

The state should also reduce the reliance on local property taxes as a funding stream for education and replace with adequate and equitable statewide funding that ensures all schools are getting the amounts they need based on a revised equitable funding formula. An equitable funding formula can also be used at the district level to ensure districts meet the needs of particular student populations. Chicago especially lags behind other cities in more fully accounting for a wider range of student abilities and needs in its funding formulas, and does not consider neighborhood needs and resources in its funding formula.

New York City, for example, provides additional funding to schools for each student who fall below expectations on the previous year’s standardized testing. Los Angeles uses a “student need index,” which gives more money to schools that have students in various high-needs categories, including homelessness. Boston considers 31 student characteristics to determine additional funding, including whether a high school student is at risk of dropping out, and whether an immigrant student is behind other students of the same age because of disruption in formal schooling.

To further support schools serving students with the greatest needs, the state and district funding formula might also consider the poverty level of the surrounding neighborhood. The percentage of low-income students in a school does not fully reflect the depth of poverty that afflicts some communities. Additional funding would strengthen schools in these communities, allowing them to better serve students and function as anchor institutions able to help revitalize the neighborhood.

Perhaps most importantly, Illinois needs to identify new revenue sources in order to contribute more funding to education across the state. Illinois is ranked last in funding public education, and that simply can no longer stand. Refer to the Center for Tax and Budget Accountability for additional guidance. Their website can be accessed here: <http://www.ctbaonline.org/>.

- *What needs to occur in order to ensure that schools are able to provide an accurate story to the public?*

Recommendation

Schools should be rewarded for their strengths and assets. Even underperforming schools have assets that are rarely discussed in the media or by the district. In order to promote the positive traits of any one school, the state can provide schools with an opportunity to describe themselves and highlight the things they think make them unique. Districts should allocate funds to assist in these communication efforts for every school.

- *What are other ways to define achievement?*

Recommendation

Growth and achievement can refer to factors other than academic progress. They can refer to things such as parental involvement in the school community, social-emotional learning, or include participation in an extracurricular activity that can add to the definition of achievement. ESSA presents states with an opportunity to look at schools more holistically, so one way to do that is to incorporate these other measures.

- *What other data do we want included in our reporting system, but not in our accountability system? (Page 22)*

Recommendation

Teaching that prepares all students for success in a complex and rapidly changing world requires teachers to learn new strategies, design lessons with colleagues and reflect together on what is working or not working as they attempt new approaches in the classroom. Teachers also need time to analyze students' work and discuss with colleagues how to help students improve further. This takes time and resources. Schools could be incentivized to report on the number of hours and resources dedicated to collaboration.

Reporting the number of counselors, nurses, librarians, and other kinds of support staff can help parents understand who their children may interact with on a given day.

Schools should disaggregate the free and reduced lunch data as a measure of poverty since research has shown there to be substantial differences in those two student populations.

3.2 IDENTIFICATION OF SCHOOLS

B. Targeted Support and Improvement Schools

ISBE requests stakeholder input into the aforementioned definition and response to the following question: For how long should a student group be underperforming before it meets the definition of "consistently underperforming"? The proposed regulations suggest identifying schools with these

student groups every two years. What might the intended and unintended consequences of such a timeline be? (Page 25)

Recommendation

The proposed definition puts the focus on whether a subgroup of students is performing at the lowest performance level on two or more academic indicators. The state should be aware, however, that large variances in performance between subgroups can also occur without a subgroup performing at the lowest performance level. These large gaps at one school should not be ignored in the effort to ensure educational equity.

Schools that have large disparities between subgroups but without those subgroups performing at the lowest performance level should not be identified for targeted support and improvement since schools exhibiting more need should receive the additional funds and support. However, these schools should not just be ignored.

The state should create within the school rating system a measure for identifying schools with large disparities between its subgroups. These schools should then be required to close these gaps over a certain amount of time. This could be determined by identifying schools with a subgroup of students that is performing more than X grade levels below (when using test scores) or X% less (when using rates) than the highest achieving subgroup in the school. Possible values for X could be 2 grade levels and 20% less.

After identifying schools with consistently underperforming subgroups, the state should consider whether all identified schools should be immediate recipients of additional funds and support. As the Council of Chief State School Officers recommends: “Implement a targeted strategy focused on a subset of the lowest-performing schools, rather than spreading money among all schools identified. The targeted strategy could include a sequencing approach that begins with schools facing similar challenges to coordinate services, the greatest capacity and willingness to dramatically improve their identified schools, or those that are geographically close to each other to consolidate resources”

(http://www.ccsso.org/Documents/2016/ESSA/CCSSOCriticalAreaOutline_SchoolImprovementSupports.pdf, p.7).

With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not? (Page 26)

Recommendation

The state should celebrate growth in achievement, especially in the short-term, and share schools’ strategies and practices with other schools receiving targeted support. If the state adopts the aforementioned definition of schools with consistently underperforming subgroups, then for a school to exit targeted support, it would need to, in the long-run, not only grow student achievement but significantly reduce gaps between subgroups.

The state should be concerned not only with what the exit criteria should be, but how it will support schools as they exit from these statuses. For example, many schools that received School Improvement Grants, although they made gains, were unable to sustain those gains once the funds ran out. The state should heed the recommendation from the Council of Chief State School Officers to “taper off coaching and monitoring to schools that are improving, rather than

having them lose external support at once, when exiting improvement status” (http://www.ccsso.org/Documents/2016/ESSA/CCSSOCriticalAreaOutline_SchoolImprovementsupports.pdf, p.8).

3.3 STATE SUPPORT AND IMPROVEMENT FOR LOW-PERFORMING SCHOOLS

How should the state define “greatest need”?(Page 30)

Recommendation

To define “greatest need,” the state could create a needs index that aggregates school-level data on student achievement, poverty rates, median household income, and community violence. The state could also take into consideration local education agencies’ capacity of and previous history for supporting school improvement.

What are practical ways for the state to include practitioners and stakeholders in the creation of a state formula and/or instruments that evaluate the quality of an improvement plan? (Page 30)

Recommendation

The state should heed the recommendations made by the Federation for Community Schools in this area around including Community School Standards (included below) to help evaluate the quality of school improvement plans.

Community School Implementation Standards

The development of Community Schools Implementation Standards serves as a first step in identifying **the knowledge, skills, and dispositions that school and community partners need in order to plan and implement successful and impactful community school partnership strategies.**

The Standards are organized into six domains and for each domain, and each domain describes high-level implementation practices.

1. Collaborative Leadership: nurtures shared ownership and shared accountability.

- 1.1 Multi-disciplinary, cross-sector community partners share responsibility and accountability for student and school success.
- 1.2 A representative site leadership team, including the principal, other school personnel, families and community partners guides collaborative planning, implementation, and oversight.
- 1.3 The principal works actively to integrate families and community partners into the life and work of the school.

2. Planning: school improvement plan incorporates the assets and needs of school, family, and community.

- 2.1 A shared vision drives educators, families, and community partners in their planning.
- 2.2 Data on school and community indicators, disaggregated by race, gender, disability, income, and other relevant factors, informs the school improvement plan.
- 2.3 A needs and assets assessment of the school, student, families, and community is conducted regularly to inform the school improvement plan.

- 2.4 The school improvement plan explicitly outlines the role of families and community partners in helping to achieve specific results.
- 2.5 The academic and non-academic results and related indicators that the community school seeks to attain are specified in the school improvement plan.
- 2.6 School improvement plan identifies evidence-based programs and practices.
- 2.7 The school site leadership team plays a decision-making role in the development of the school improvement plan.
- 2.8 A mechanism for measuring progress toward desired results and indicators is defined in the plan.

3. Coordinating Infrastructure: facilitates coordination of school and community resources.

- 3.1 A dedicated full time coordinator facilitates alignment of people, programs and practices.
- 3.2 School personnel and community partners are organized into working teams focused on specific issues, e.g., mental health, after school, mentoring.
- 3.3 School personnel and community partners assess the effectiveness of their relationships on a regular basis.
- 3.4 Community School Coordinator is a member of the school leadership team.
- 3.5 The Community School Coordinator facilitates close communication among the principal, teachers, other school staff, and community partners.
- 3.6 The Community School Coordinator facilitates school and partnership data collection, sharing, and analysis.

4. Student-Centered Data: data guide assistance to individual students.

- 4.1 Data systems and protocols are in place to assure that each child receives individualized support.
- 4.2 Policies and procedures are in place to safeguard student confidentiality.
- 4.3 Interdisciplinary teams use data to prepare individualized plans to make sure every student gets the opportunities and supports they need.
- 4.4 Agreements are in place to share student data and data on services being provided to individual students among school personnel, community school coordinators and community partners.

5. Continuous Improvement: deepens the impact of the community school.

- 5.1 Data and participant feedback are analyzed annually by the site leadership team to assess program quality and progress and develop strategies for improvement.
- 5.2 Issues requiring policy or procedural changes and resource needs are communicated to leaders and staff at the systems level.
- 5.3 Joint professional development enables educators, community partners and families to develop the knowledge, skills and abilities to work effectively together, share best practices and apply those practices in their work.
- 5.4 Community partners participate in relevant professional development sponsored by the school district.

6. Sustainability: ensures ongoing operations of the community school.

- 6.1 A strategy for continuously strengthening shared ownership for the community school among school personnel, families, and community partners is in place.
- 6.2 A plan to sustain funding for the community school, including both the position of the community school coordinator and specific programs is in place.

- 6.3 Principals prepare budgets with a view to helping sustain the community schools.
- 6.4 Community partners commit to a long-term relationship with the school, driven by student and school needs, and modify their organization and culture to support the community school partnership
- 6.5 Community partners help generate funding for programs that will be operated under the umbrella of the community school.
- 6.6 Educators, community partners, and families publicly advocate for community schools within their organization and across their community.

ISBE requests stakeholder comments on the proposed periodic resource allocation review. (Page 33)

Recommendation

The state should heed the recommendations made by the Federation for Community Schools in this area as well. “The community school strategy should be a fundamental component of the state’s school improvement plans and plans for transforming low-performing schools. The community school model promotes academic achievement by fostering family engagement, aligning resources to remove nonacademic barriers to success, engaging the community in planning for school improvement, and providing afterschool programs linked to classroom learning and enrichment.”

The Coalition for Community Schools further shows the effectiveness of community schools by arguing that every dollar spent on community schools returns anywhere from \$10 to 14 of social value”

(<http://www.communityschools.org/assets/1/AssetManager/Community%20School%20Results%202013.pdf>, p.4)

Consequently, return on investment studies should be included in the resource allocation review even if it doesn’t meet the levels of evidence ESSA outlines. Furthermore, the state should consider reviewing the interactions between community development and school improvement and ensure that the evidence-based interventions the state will collect include community-school partnerships that go beyond the walls of a school.

In addition, the state should look at the Carnegie Foundation for the Advancement of Teaching’s focus on improvement science in education and rapid learning cycles as a way to increase ground-level ownership of school improvement and incorporate data into school improvement.

(See: <https://www.carnegiefoundation.org/our-ideas/>)

Affirmation

The state’s proposal to conduct equity audits in the planning year as well as in the periodic resource allocation review is necessary and welcome.

Section 4: SUPPORTING EXCELLENT EDUCATORS

No Comment

Section 5: SUPPORTING ALL STUDENTS

5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS

ISBE requests additional suggestions for ways it may consider the use of Title IV, Part A funds to

- 1) Provide all students with access to a well-rounded education;
- 2) Improve school conditions for student learning; and
- 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students (Page 56)

Recommendation

Generation All agrees with the ISBE’s priority in supporting local education agencies efforts to develop strong MTSS (multi-tier systems of support).

In addition to the ideas mentioned through this section, Generation All has developed best practices to help ensure that all students have access to a well-rounded and high quality education. Located in our action plan, these main ideas are:

1a. Strengthen teaching and learning by making instruction challenging, student-centered and connected to young people’s lives and communities.

Ex: Teachers develop at least one unit in every discipline that culminates in a learning activity with an out-of-school partner.

1b. Invest in teachers and principals, prioritizing time for them to learn, plan and collaborate.

Ex: Universities partner with neighborhood public high schools to provide expertise in academic content areas and pedagogy to guide teachers’ professional learning.

1c. Make neighborhood high schools centers of their community.

Ex: School and community leaders work together to recruit partners and create programs that best meet the needs of both the neighborhood and the school.

1d. Offer comprehensive college and career advising for students at all neighborhood public high schools.

Ex: Local funders and businesses offer “progressive pathways,” a program that allows young people to combine formal education, job training and employment to build toward college or career success. For example, businesses could hire students as apprentices, provide other on-the-job training or offer a work-to-college track.

1e. Strengthen restorative practices to make schools safe and supportive for students and adults.

Ex: School-based health centers host regular evening events at which outside practitioners run workshops on methods for dealing with stress, such as meditation, yoga, breathing exercises and similar relaxation techniques, for students, school staff, parents and community members.

The Generation All action plan can be found here:

http://genallplan.org/wp-content/uploads/2016/04/Gen_All_ActionPlan.pdf

- *Considering the reality that the state funding formula must be addressed to ensure equity, how can Illinois ensure equitable distribution of resources?* (Page 38 of Reader’s Guide)

Recommendation

The Illinois state funding formula must fund schools adequately and equitably according to the needs of the student population and surrounding community. ISBE should ensure all schools have base-line teacher and support staff positions guaranteed no matter how many students

attend the school or where the school is located. For example, some Chicago high schools can only offer the minimum graduation requirements due to small student populations which translate into fewer dollars for the school. In some cases, schools have rolling substitute teachers for a particular subject because they cannot afford to hire a full-time teacher. This kind of practice should be flagged and schools in these situations should receive extra funding and support to ensure their student populations have access to the same resources as students living in higher income communities.

ISBE should also be mindful in how it uses federal funds, especially when it comes to opening new schools. In communities where there is no population increase, perhaps consider that the community does not need a new school, but rather, funds should be invested into the existing assets using evidence-based improvement models. Continuing to open new schools and stratify resources can have a devastating impact in some communities and serve to only increase the inequities in the system. As previously stated, Generation All cautions against the proliferation of charter schools in areas that are struggling with student enrollment. We also encourage the state to develop a revised funding formula that takes into account student and community needs in order to ensure adequate and equitable resources for all students.

HEALTHY SCHOOLS CAMPAIGN

EVERY CHILD DESERVES TO LEARN + THRIVE

October 7, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street, Springfield, IL 62777

Re: Response to Illinois State Board of Education's ESSA State Draft Plan #1

Dear Dr. Smith,

Thank you for the opportunity to respond to the first draft of the state's plan for implementation of the Every Student Succeeds Act (ESSA).

Healthy Schools Campaign (HSC) is a nonprofit organization dedicated to ensuring that all students have access to healthy school environments so they can learn and thrive. ESSA recognizes the need for schools to support the whole child and specifically acknowledges the importance of promoting physical and mental health and wellness. The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning.

In our comments, HSC provides recommendations to the Illinois State Board of Education (ISBE) on improving the proposed Illinois state plan, responses to the questions raised in the plan, and supplemental background information to justify our recommendations. Additional information is available upon request.

ISBE has already recognized the connection between student health and education and has taken action to support social and emotional learning, physical health, improved attendance and forward-thinking discipline practices. We urge you seize the new opportunity presented by the implementation of ESSA to further support student health and school wellness. Illinois has been a leader and now has a chance to create a national model for incorporating health and wellness into its accountability systems, report cards, needs assessments and professional development.

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,



Rochelle Davis, President and CEO

Executive Summary: HSC Recommendations

The Every Student Succeeds Act (ESSA) presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting the physical and mental health and wellness of students.

HSC recommends incorporating student health and school wellness into the Illinois state plan through accountability systems and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and identify evidence-based policies, practices and programs to lead to school improvement. In addition, educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools and, most importantly, students. Toward that end, HSC recommends:

- **Using chronic absenteeism and/or aggregate student fitness scores** as the accountability measure for school quality. To support continued improvement, HSC recommends that school report cards, needs assessments, evidence-based practices and professional development programs be designed to support continued improvements on these two metrics. HSC further recommends preserving the presentation of both of these indicators on school report cards.
- **Including other health-related indicators on school report cards** to illustrate various aspects of a healthy school environment.
- **Designing and implementing assessments for health, physical education (PE) and social and emotional learning** that are aligned with the state's existing (or emerging) standards to ensure that school districts are offering students a well-rounded education.
- **Creating supportive environments to promote staff wellness**, reduce stress and improve teacher satisfaction and retention.

HSC's recommendations are related to the following sections of Illinois' proposed plan, as well as sections that are pending public comment, including those related to accountability measures.

Organized by content areas, HSC recommendations focus on:

	Standards and Assessments	Accountability System	Report Cards	Needs Assessments	School Improvement/Evidence-Based Interventions	Professional Development
Chronic Absenteeism		✓	✓	✓	✓	✓
Student Fitness/ Access to Physical Activity	✓	✓	✓	✓	✓	✓
Social and Emotional Learning	✓			✓	✓	✓
Other Health-Related Factors (including access to health professionals and optimal facilities)			✓	✓	✓	✓
Optimizing Working Conditions for Staff			✓	✓	✓	
Ensuring a Well-Rounded Education				✓	✓	✓

Introduction: Illinois Should Integrate Health and Wellness Into Education Policy and Practice

The Learning-Health Connection

The link between health and learning is clear: healthy, active and well-nourished children are more likely to attend school, be ready to learn and stay engaged in class.

Despite widespread agreement on these facts, many school environments do not promote health. Too many students spend their days in buildings with unhealthy air, have limited opportunities for

physical activity and have inadequate access to fresh water, nutritious food or a school nurse. Many students come to school with one or more health problems that impact their ability to learn. According to the U.S. Centers for Disease Control and Prevention (CDC), the incidence of chronic diseases—including asthma, obesity and diabetes—has doubled among children over the past several decades. This has implications not only for children’s long-term health but also for their opportunities to learn and succeed at school. Just as important, we know that students who achieve success in school are more likely to achieve better health over their lifetime.¹

This challenge is especially critical in light of the nation’s vast health and educational disparities. Low-income and minority students experience higher rates of health challenges that can hinder learning. These students are also more likely to attend schools that have unhealthy environments and do not invest in evidence-based prevention. Unless we address these disparities in health status and school environments, efforts to close the education achievement gap will fall short.

Illinois Policy Recognizes the Importance of Student Health and Wellness

The State of Illinois recognizes the inextricable link between health and learning. Existing state policies require or encourage schools to address a range of issues including social and emotional learning, school climate, PE and fitness, chronic absenteeism and discipline practices. In fact, one of the goals of the current state plan is for every school to offer a safe and healthy learning environment for all students.²

The Children’s Mental Health Act of 2003 required the Illinois State Board of Education (ISBE) to "develop and implement a plan to incorporate social and emotional development standards as part of the Illinois Learning Standards." Accordingly, Illinois became the first state in the country to adopt social and emotional learning standards spanning all grade levels. These ten standards seek to promote mental wellness, prevent mental health issues, improve school connectedness, reduce student absenteeism and suspensions, and improve academic outcomes. Additionally, ISBE has required school districts to administer the 5Essentials Survey in order to identify indicators that positively affect student success, including “effective leaders,” “collaborative teachers,” “involved families,” “supportive environments,” and “ambitious instruction.”

Further demonstrating the state’s commitment to the whole child, in 2011, Illinois recognized the need to **incorporate health and wellness measures into the school report card**. Illinois was the first state to require daily PE for all students. Illinois officially recognizes that comprehensive K-12 physical development and health programs contribute to students achieving active and healthy lives. As a result of the work by the Illinois Enhance Physical Education Task Force, the state revised State Goals 19-24—and accompanying physical development and health performance descriptors—in order to promote movement skills (goal 19), physical fitness (goal 20), team-building (goal 21), health promotion, prevention, and treatment (goal 22), human body systems

¹ Health in Mind: Improving Education Through Wellness, by HSC and Trust for America’s Health, May 2012. Available at https://healthyschoolscampaign.org/wp-content/uploads/2015/07/Health_in_Mind_Report.pdf

² Illinois State Board of Education: Progress Report of the Comprehensive Strategic Plan for Elementary and Secondary Education. Available at http://www.isbe.net/reports/strategic_plan16.pdf

(goal 23), and communications and decision-making (goal 24). Earlier this year, ISBE adopted rules requiring that all students in grades 3-12 be tested in four FitnessGram assessments in order to measure student progress in aerobic capacity, flexibility, muscular endurance and muscular strength.

Next, the state has recognized the importance of addressing **chronic absenteeism**. The Attendance Commission, created by Public Act 99-0432, began meeting late last year and submitted its first report in March. The commission is charged with identifying strategies to help parents, educators, principals, superintendents and ISBE address and prevent chronic absenteeism. The reasons for chronic absenteeism are many but health-related issues, such as asthma and oral health, are common factors affecting attendance rates. Another important factor affecting attendance is school discipline. In September 2016, Illinois Senate Bill 100 went into effect and eliminated automatic “zero tolerance” suspensions and expulsions, required that schools exhaust all other means of intervention before expelling students or suspending them for more than three days, prohibited fines and fees for misbehavior and required schools to communicate with parents about why certain disciplinary measures are used. Under the new law, students returning from suspension will be allowed to make up the school work they missed, and students suspended for more than four days will be offered access to supports such as academic counseling and mental health services.

Finally, Illinois has acknowledged that **facilities** are an integral part of a healthy school environment. Schools built with state funds must meet a green standard and the Illinois Green Ribbon Schools program recognizes schools that integrate best practices in energy, water and waste management, healthy school environments and environmental education. Schools must also practice safe use of pesticides in line with the Integrated Pest Management plan required by the Structural Pest Control Act. The Illinois Green Cleaning Schools Act requires the use of environmentally sensitive cleaning and maintenance products in all Illinois public and private elementary and secondary schools with 50 or more students.

ESSA: A New Opportunity to Support Student Health and Wellness

ESSA presents a new opportunity for schools to address student health and wellness. While both NCLB and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting student physical and mental health and wellness.

ESSA recognizes the importance of student health and school wellness in a number of important ways. A few examples follow:

- Health and PE have been added to the list of subjects that define a student’s “well-rounded education.” Schools eligible for Title I grants may use funding to develop and implement “well-rounded programs[s] of instruction.”
- Each State Education Agency (SEA) is required to create a state accountability system with at least four indicators of their choosing, including three academic indicators and one non-

academic indicator (a measure of school quality or success). Examples of non-academic indicators listed in ESSA include measures of school climate and safety, such as chronic absenteeism and incidences of violence.

- Each SEA must release an annual state report card describing how the state is meeting Title I requirements. In addition to measures such as per-pupil expenditures and student achievement, the report cards must include rates of chronic absenteeism and incidences of violence, including bullying and harassment. Local Education Agencies (LEAs) are also required to prepare and disseminate report cards to the public that include the same minimum requirements as the SEA report cards (e.g., the requirement to include rates of chronic absenteeism).
- Title I funded schools with Schoolwide Program Plans must design these plans based on comprehensive needs assessments for the entire school. While the plans should focus on the needs of all children in the school, designers should place particular emphasis on the needs of high-risk students. This may include counseling, school-based mental health programs and specialized instructional support.
- In order for SEAs to receive Title I grants, ESSA requires them to develop state plans in coordination with specialized instructional support personnel. Specialized instructional support personnel include school counselors, school social workers, school psychologists, school nurses and others.
- States receiving Title I funding must have state plans that describe how they will improve school conditions for student learning through reducing discipline practices that remove students from the classroom and aversive behavioral interventions that compromise student health.
- Title IV, Part A of ESSA consolidates 49 grant programs, some of which focused on student health, into a new grant program called the Student Support and Academic Enrichment Grant. SEAs and LEAs can use these grants to promote student health, increase access to a well-rounded education and improve the use of technology.
- Access to professional development has been expanded under Title II of ESSA to include all teachers, as well as administrators and other staff. This expansion of eligibility, along with a broadening of acceptable programs, allows for professional development of all staff to include health and wellness-related training.

Given the importance of student health and the key role that schools can play in promoting student health and wellness, incorporating health and wellness into Illinois' state plan in a comprehensive fashion will provide educators, policymakers and the public with a more complete understanding of how student health and wellness are impacting learning and academic outcomes and can serve as a decision-making compass, not stigmatizing parents and students or blaming educators but rather, helping schools and school districts effectively drive improvement strategies. If accountability systems recognize the full experience of a student—including health conditions that might impede learning—educators can develop a more comprehensive understanding of student performance, and can deploy resources to schools and students at greatest risk. Parents and community members also benefit from knowing more about how their schools are supporting and promoting student health and well-being. Other community institutions, most notably hospital and public health

departments, can help support schools in their efforts to ensure students are in school, healthy and ready to learn.

HSC Responds to Illinois' Proposed State Plan: *Expanding the Opportunity for Illinois to Support Optimal Student Achievement, Development, and Health*

HSC recommends incorporating student health and school wellness into Illinois' state plan through accountability systems and school report cards. The accountability systems and report cards should be supported by needs assessments that consider health and wellness, and identify evidence-based policies, practices and programs to lead to school improvement. In addition, educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools and, most importantly, students. Toward that end, HSC recommends:

- **Using chronic absenteeism and/or student fitness scores** as the accountability measure for school quality and supporting these metrics through the needs assessments, evidence-based practices and professional development.
- **Including other health-related indicators on school report cards** to illustrate various aspects of a healthy school environment.
- **Designing and implementing assessments for health, PE, and social and emotional learning** that are aligned with the state's existing (or emerging) standards to ensure that school districts are offering students a well-rounded education.
- **Creating supportive environments to promote staff wellness**, reduce stress and improve teacher satisfaction and retention.

These recommendations are described in greater detail below, aligned by the sections of the Illinois proposed state plan.

Challenging Academic Standards and Academic Assessments (Proposed Illinois State Plan, p. 6): Expanding to Include Assessments of Health-Related Standards

ESSA requires schools to offer students a "well-rounded education." The definition of well-rounded education includes health education and PE. In addition, each state plan must provide an assurance that the state has adopted challenging academic content and high quality student academic assessments in a number of subjects such as math, reading or language arts, and science and may develop standards and implement assessments in other subjects.

Given that Illinois already has standards for social emotional learning, health education and PE, HSC recommends implementing assessments for these areas. Developing and implementing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on the effect of instruction on student acquisition of knowledge and skills, based on state standards, will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas. We do not recommend that these assessments be used in state accountability systems or in a punitive

manner; rather, these assessments should be used to improve teaching and learning in these critical content areas.

State-level assessments of social and emotional learning are still emerging and states and districts are considering how to measure these concepts in ways that are valid, reliable and accurate. As states continue this work, Illinois has the opportunity to join the leadership on assessments. As Illinois has led the country on adopting social and emotional learning standards, the state could also be the leader in determining the best methodology for assessing student acquisition of knowledge against these progressive state standards. Examples of how states and districts have assessed social and emotional learning include California's CORE Districts, which have identified ways to assess four key social and emotional indicators. Other states have adopted surveys of school climate, such as the ED School Climate Surveys, which include some questions about social and emotional learning, while some school districts use student-level assessments such as The Search Institute's Developmental Asset Survey, among others.

In regards to assessing PE, states including [New Hampshire](#) and [Washington](#) have developed guidance for required assessment of students' progress in PE against state standards. Illinois may consider developing similar requirements, assessments and corresponding guidance.

***Illinois' Accountability Support and Improvement for Schools
Accountability System and Indicators (Proposed Illinois State Plan, pp. 13-22): Include Chronic Absenteeism and Student Fitness as Measures of School Quality and Student Success***

Based on the correlation of chronic absenteeism and student fitness with student achievement and the ability to provide actionable information on these metrics to educators to improve school environments, HSC recommends that the state accountability system include these metrics as their indicators of school quality and student success. The proposed indicators meet the U.S. Department of Education's proposed requirements for these measures, as shown below.

Table One: Proposed Accountability Measures Meet U.S. Department of Education's Proposed Requirements

	Chronic absenteeism	Physical fitness
Is valid, reliable and comparable across all LEAs in the state	✓	✓
Can be disaggregated for each subgroup of students	✓	✓
Includes a different measure than the state uses for any other indicator	✓	✓
Is supported by research finding a connection to student achievement	✓	✓

Aids in meaningful differentiation among schools by demonstrating varied results across schools	✓	✓
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Chronic Absenteeism: HSC recommends that ISBE include the reduction in the rate of chronic absenteeism as an accountability measure of school quality or student success.

Chronic absenteeism, which is commonly defined as missing 10 percent or more of school days for any reason, excused or unexcused, detracts from learning and is a proven early warning sign of academic risk and school dropout, resulting in decreased literacy and numeracy skills in elementary levels, higher rates of school failure in middle school, high school dropout and lower levels of college completion. In Illinois, about 13 percent of students are chronically absent, with 12 percent of school districts accounting for 75 percent of chronically absent students.

Given the critical link between chronic absenteeism and educational outcomes, **HSC recommends that ISBE include chronic absenteeism in its state system as an accountability measure.** ISBE should adopt the definition of chronic absenteeism used by the nonprofit Attendance Works, which defines it as missing 10 percent or more of school days, including excused and unexcused absences as well as days missed due to suspensions. Schools are already required to report chronic absenteeism data to the U.S. Department of Education’s Office of Civil Rights (OCR) and include information on the school report card. Chronic Absenteeism was proposed by Illinois’ Accountability Workgroup (see p. 16 of proposed plan) as a potential non-academic measure of school quality and student success. When establishing this indicator, ISBE should consider Connecticut’s approach. In Connecticut, schools can receive up to 100 points total for this metric, with up to 50 points for their overall chronic absenteeism rate and up to 50 points for a high-need subgroup chronic absenteeism rate. Full points are awarded if chronic absenteeism is 5 percent or lower. No points are awarded if the rate is 30 percent or greater. Rates between 30 percent and 5 percent are awarded proportional points. Once ISBE has shared a draft accountability system, HSC will provide specific recommendations for incorporating chronic absenteeism.

Student Fitness: HSC recommends that a physical fitness measurement be included as an accountability measure of school quality and student success.

According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being. Physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during and after school to ensure that their students are ready to learn.

The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use FitnessGram assessments to measure students’ progress toward the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance and muscular strength. School districts are required to report aggregate data to ISBE by May 1 of each year.

HSC recommends that ISBE leverage existing data to include physical fitness measurement as an accountability measure to assess school quality and student success. This measure could assess the percentage of students who score within the Healthy Fitness Zone on their FitnessGram assessments.

Several states require that students take the FitnessGram assessment to measure fitness levels. In 2015, Connecticut became the first state to include student fitness as part of their Next Generation Accountability System, which was developed with stakeholder feedback. Once ISBE has shared a draft accountability system, HSC will provide specific recommendations for incorporating a student fitness measure.

In order to ensure that Illinois' accountability system is supportive, HSC's recommendations around school report cards, needs assessments, evidence-based interventions and professional development are designed to support HSC's recommendation to incorporate chronic absenteeism and student fitness as an accountability measure. While these recommendations can be taken separately, HSC strongly encourages ISBE to consider them as an integrated approach to support continual improvement.

Illinois State Report Card: Maintain Existing Health-Related Measures and Add Additional Measures

HSC's recommendations around school report cards are designed to provide parents and others with information that create a more comprehensive picture of a school's efforts for continual improvement around attendance and student fitness.

Chronic Absenteeism: ESSA already requires states that receive Title I funding to include chronic absenteeism on their school report card. HSC recommends that ISBE define chronic absenteeism as missing 10 percent or more days of school, including excused and unexcused absences and suspensions. In addition, ESSA already requires states that receive Title I funding to include other measures that relate to or inform student attendance: rates of in-school suspensions, out-of-school suspensions and expulsions; school-related arrests and referrals to law enforcement; and incidences of violence, including bullying and harassment. In addition, HSC recommends the following measures, which also relate to or inform chronic absenteeism on the school report card:

- **School breakfast participation:** When students eat breakfast, they have better attendance rates and improved academic achievement. However, according to the Food Research and Action Center, only about half the number of students who are eligible for free school breakfast actually eat breakfast.³ School report cards should include the percentage of students eligible for free and reduced school meals, the percentage of students who eat lunch and the percentage of students who eat breakfast at school.
- **Integrated Pest Management and Green Cleaning Policy:** According to the Environmental Protection Agency, 10.5 million school days are missed each year due to asthma. Maintaining a

³ Food Research & Action Center, "Mapping School Breakfast: Participation, Funding, and Growth." Available at: http://frac.org/frac_map

healthy school environment by eliminating triggers for chronic illnesses such as asthma would positively impact attendance rates.⁴ Report cards should indicate whether a school's policies and practices comply with state law related to Integrated Pest Management and green cleaning.

- Ratio of students to school nurses: Research published in the Journal of School Health shows that when students have access to a school nurse, their attendance improves because they are better able to manage chronic illness and can avoid trips to the emergency room.⁵ This information is already being submitted to the U.S. Department of Education's Office of Civil Rights (OCR).
- Ratio of students to school mental health professionals: Mental health conditions, behavior issues and trauma are all causes of school avoidance and truancy.⁶ This information is already being submitted to OCR.

Student Fitness: Illinois currently includes measures related to PE on the school report card, which HSC supports maintaining. HSC recommends that ISBE include additional measures on school report cards which relate to student fitness. Additional measures could include but are not limited to:

- Daily recess offered
- Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- Policies encouraging students to bike or walk to school
- Average class size for PE, by grade
- Number of qualified PE teachers
- Percentage of students granted PE waivers
- Percentage of students with disabilities who participate actively in PE classes
- Strength of the district's wellness policy as measured by using the [WELLSAT](#) or similar tool
- Policies against withholding recess or physical activity as a form of punishment

State Support and Improvement of Low-Performing Schools (p. 27-30): Ensure Rigorous and Comprehensive Needs Assessments and Evidence-Based Interventions

Comprehensive Needs Assessments Should Assess Root Causes of Chronic Absenteeism and Design Evidence-Based Interventions Based on Findings

Under Title I, schools identified for targeted or school-wide improvement interventions must undertake a comprehensive needs assessment to hone in on specific areas of need, as well as available resources and assets. In order to ensure that the Illinois accountability system is supportive of continual improvement, HSC's recommendations around needs assessments and

⁴ United States Environmental Protection Agency, "Managing Asthma in the School Environment." Available at: <https://www.epa.gov/iaq-schools/managing-asthma-school-environment>

⁵ "School Nurses' Role in Asthma Management, School Absenteeism, and Cost Savings: A Demonstration Project." Available at: <http://onlinelibrary.wiley.com/doi/10.1111/josh.12102/abstract>

⁶ Upstream Public Health, "The Connection Between Missing School and Health: A Review of Chronic Absenteeism and Student Health in Oregon." Available at: <http://www.attendanceworks.org/wordpress/wp-content/uploads/2014/10/Chronic-Absence-and-Health-Review-10.8.14-FINAL-REVISED.pdf>

evidence-based interventions are designed to support HSC's recommendation to incorporate chronic absenteeism and student fitness as an accountability measure. While HSC's recommendations can be taken separately, HSC strongly encourages ISBE to consider them as an integrated approach to supporting continual improvement.

Comprehensive needs assessments should help schools identify the root causes of chronic absenteeism specific to their student population. For example, while the causes of chronic absenteeism are multifold, student health conditions present ongoing challenges to attendance. Health-related chronic absenteeism primarily affects young children in ways that can shape academic outcomes for their entire school career. Both chronic and acute health conditions can prevent students from attending school. Commonly conditions include dental caries, asthma, influenza, diabetes, obesity and related illness, seizure disorders, mental health and anxiety and vision problems. Additionally, students who are less connected to their school or adults in their schools, or those who experience a non-supportive school climate, may be less likely to come to school.

A needs assessment that helps schools understand the root causes of chronic absenteeism should take into account a range of student needs, including school climate and safety, environmental health risks, or the availability of qualified on-site school health professionals. The needs assessment should help schools create coordinated interventions that include school and community-based resources. ISBE should include some of the following in the needs assessments template:

- Information about the health status of students, such as the number of students attending school with asthma, diabetes or other chronic conditions
- School climate and safety, such as through Illinois' [5Essentials](#) Survey or the U.S. Department of Education's [School Climate Survey](#)
- School discipline policies
- School health policies and practices using the CDC [School Health Index](#) or the Alliance for a Healthier Generation [Healthy Schools Program assessment](#) (HSP)
- Environmental health needs of school buildings against the Environmental Protection Agency's (EPA) [Model School Environmental Health Program](#) guidelines or, at minimum, the district's compliance with Illinois' school environmental health requirements
- Staffing patterns, such as the ratio of qualified health professionals to students, including but not limited to school nurses, social workers and school counselors using district human resources data
- For schools that are eligible for the Community Eligibility Provision, which provides free meals to all students, indicate if schools are participating in this program

ISBE could help school districts identify additional public agencies or nonprofits that work on public health, health care, juvenile justice or mental health, to find locally available data to incorporate into their assessments, such as:

- Hospital data, such as pediatric emergency room visits for specific conditions
- Youth Risk Behavior Survey data (if available locally)

- Environmental health data, such as air quality
- Crime rates by neighborhood, including gang activity

Based on the findings from a school’s comprehensive needs assessments, school districts could opt to use Title I funds to target policy, program and practice interventions to address the root causes of chronic absenteeism, in partnership with community-based resources (to the extent possible). ISBE could ensure that School Improvement Plan templates include opportunities for schools to adopt interventions designed to reduce chronic absenteeism rates in the school.

In addition, ISBE could provide examples of evidence-based policy, practice and/or program interventions such as:

- Creating a supportive school climate that promotes health and well-being; for example, training teachers on methods such as Responsive Classroom, Positive Behavioral Interventions and Supports, or other such approaches
- Adopting an early warning system to identify students at greatest risk of being chronically absent
- Addressing environmental health challenges of the school to reduce asthma triggers; for example, implementing Integrated Pest Management, reducing unnecessary chemicals in the school, implementing mold remediation, and other approaches
- Ensuring that students have chronic disease management plans, such as food allergy or asthma action plans that are shared and discussed with school personnel, including classroom teachers
- Developing staffing structures to support students with a range of needs
- Creating or enhancing partnerships with community entities to create wrap-around models of care

HSC recommends that ISBE consult the U.S. Department of Education’s What Works Clearinghouse, the Substance Abuse and Mental Health Services National Registry of Effective Programs and Practices, the Centers for Disease Control and Prevention’s Division of Adolescent and School Health, and Illinois’ Institutions of Higher Education for specific policies, programs and interventions.

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools and Design Evidence-Based Interventions Based on Findings

Likewise, comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development and health. For example, by assessing student fitness outcomes, schools can determine whether or not they need to increase the opportunities before, during and after school for students to be physically active. ISBE can provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Several publicly available tools also provide guidance on action planning to make improvements in the school environment. These tools include:

- The CDC’s [School Health Index](#), specifically the PE and Other Physical Activity Programs module (Module 3)

- The [Let's Move Active Schools](#) baseline assessment (schools will need to first register for Let's Move Active Schools)
- The [Alliance for a Healthier Generation Healthy Schools Program](#) assessment

Both the Let's Move Active Schools and the Alliance for a Healthier Generation's assessments mirror the School Health Index. Schools may already have engaged in one of these assessments within the two previous school years. Conducting these assessments assists schools by helping them create action plans, and connects them to resources, funding opportunities and potential national recognition.

HSC recommends that ISBE promote the CDC's Comprehensive School Physical Activity Program (CSPAP), which is the most comprehensive, widely recognized and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during and after school.

Another effective strategy for supporting physical activity in schools is the creation of school health councils. School districts that participate in the federal school meal program are required to have a wellness policy that guides the district's efforts to promote healthy eating and physical activity. According to the CDC, establishing a school health council is an effective way to achieve an enduring focus on promoting physical activity and healthy eating.⁷

On an additional note, given the importance of student health to academic achievement, PEW Health Impact Project is conducting a rapid Health Impact Assessment on how health and wellness in school-level needs assessments could impact academic achievement. The preliminary findings indicate that school level needs assessments and the resulting comprehensive support and improvement plans could be strengthened by explicitly examining important health determinants and health issues that can contribute to student academic achievement and school performance. Their [preliminary findings](#) were articulated in their response to the U.S. Department of Education proposed rules for ESSA implementation. A full report will be available before the end of the year.

Supporting Excellent Educators: Systems of Educator Development, Retention, Advancement, and Support (pp. 33-41): Preparing Educators to Support Students' Achievement and Health
As schools refine their approaches to addressing the needs of all learners, educators will require supplemental training on the root causes of chronic absenteeism and methods for promoting healthy, caring and positive school environments. Although ISBE proposed a list of potential professional learning opportunities, other emerging issues might also be added to the proposed list and some topics seemed redundant.

HSC applauds ISBE for supporting this comprehensive range of proposed learning opportunities and recommends that ISBE organize the training into general categories on pages 47-48 of the

⁷ U.S. Department of Health and Human Services Centers for Disease Control and Prevention "Make a Difference at Your School!" report. Available at: <http://www.cdc.gov/HealthyYouth/KeyStrategies/pdf/make-a-difference.pdf>

proposed plan. These trainings should support the development of educator competency related to understanding, assessing and addressing the root causes of chronic absenteeism. For example, these categories could include:

- Universal design for learning
- Social emotional learning
- Capacity building for school, community and parent/caregiver engagement

These general categories would allow ISBE maximum flexibility to add specific training content within these categories and to continually evaluate the professional development opportunities to ensure alignment with evidence-based best practices.

In addition, ISBE should provide professional development for other staff, including:

- Superintendents and principals, on how to develop and implement an early warning system, how to create a school environment that is supportive of students and staff, and how to support student health and school wellness
- School personnel responsible for maintaining school facilities around EPA's School Environmental Health Program, green cleaning and integrated pest management

ISBE should support schools' adoption of physical activity policies and practices by encouraging professional development on these content areas. ISBE should offer professional development or could link educators with other groups in the field that provide learning opportunities, including many that are free for participants. Groups such as the Alliance for a Healthier Generation and SHAPE America offer a wide range of opportunities, including webinars, podcasts and in-person training sessions.

Positive Working Conditions: HSC recommends that ISBE assess school staff's working conditions to identify strategies to improve overall working conditions and improve teacher satisfaction, reduce teacher burnout and increase staff retention.

Title II funds can be used by states and school districts to conduct and publicly report on an assessment of educator support and working conditions that would be developed with teachers, leaders, parents, students and the community. For example, Title II funds could be used to develop and conduct an evaluation of teacher stress levels to better understand teachers' working conditions.

Positive working environments are important for teacher retention and teacher productivity. Additionally, there is a direct link between the well-being of teachers and the educational outcomes of their students. According to a report from Pennsylvania State University and the Robert Wood Johnson Foundation, "elementary school teachers who have greater stress and show more symptoms of depression create classroom environments that are less conducive to learning, which leads to poor academic performance among students." Effects of teacher stress range from lower

scores on math tests to more behavior problems and lower levels of social adjustment and student engagement.⁸

High stress and poor working environments drive many teachers out of the profession. Turnover is most likely to occur in poorly performing schools, which contributes to a long-term destabilization of low-income neighborhood schools. This cycle deepens existing inequities in the school system.

HSC recommends that ISBE conduct and publicly report on an assessment of educator support and working conditions, with an emphasis on stress and the condition of the school facility, and use those findings to inform other policies and practices.

Table Two: Summary of Recommendations for Accountability Measure, School Report Card Measures, Needs Assessment, Evidence-Based Practices and Professional Development

	Chronic Absenteeism	Student Fitness
Accountability Measure	Reductions in the percent of students who are chronically absent	The percent of students who score within the Healthy Fitness Zone on their FitnessGram assessments; or the percent of students who improve their Healthy Fitness Zone scores on the assessment over the school year
School Report Card	<ul style="list-style-type: none"> • Rates of in-school suspensions, out-of-school suspensions and expulsions • School-related arrests • Referrals to law enforcement • Chronic absenteeism • Incidences of violence, including bullying and harassment <p>(Note: All of these are required.)</p>	<ul style="list-style-type: none"> • Number of days of PE (Already included) • Daily recess offered • Policies for requiring physical activity or movement during the day • Policies encouraging students to bike or walk to school • Average class size for PE, by grade • Number of qualified PE teachers • Students granted PE waivers • Percent of students with disabilities who participate actively in PE classes
Needs Assessment	<ul style="list-style-type: none"> • Information about the health status of students • School climate and safety, 	<p>One of the following:</p> <ul style="list-style-type: none"> • The CDC's School Health Index, specifically the PE and Other

⁸ Pennsylvania State University and Robert Wood Johnson Issue Brief, Teacher Stress and Health: Effects on Teachers, Students, and Schools, Greenberg M, Brown J, and Abenavoli, September 2016. Available at: http://www.rwjf.org/content/dam/farm/reports/issue_briefs/2016/rwjf430428

	<p>such as through Illinois' 5Essentials Survey or the U.S. Department of Education's School Climate Survey</p> <ul style="list-style-type: none"> • School discipline policies • CDC School Health Index • EPA's Model School Environmental Health Program guidelines or, at minimum, the district's compliance with Illinois' school environmental health requirements • Staffing patterns, such as the ratio of qualified health professionals to students, including but not limited to school nurses, social workers, and school counselors using district human resources data 	<p>Physical Activity Programs module (Module 3)</p> <ul style="list-style-type: none"> • The Let's Move Active Schools baseline assessment • The Alliance for a Healthier Generation Healthy Schools Program assessment
Evidence-Based Interventions	<ul style="list-style-type: none"> • A supportive school climate that promotes health and well-being such as Responsive Classroom, Positive Behavioral Interventions and Supports • An early warning system to identify students at greatest risk of being chronically absent • Environmental health challenges of the school to reduce asthma triggers, such as Integrated Pest Management, reducing unnecessary chemicals in the school, implementing mold remediation and other issues 	<p>CDC's CSPAP, which is the most comprehensive, widely recognized and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during and after school</p>

	<ul style="list-style-type: none"> • Ensuring that students have chronic disease management plans • Staffing structures to support students with a range of needs • Partnerships with community entities to create wrap-around models of care 	
Professional Development	<ul style="list-style-type: none"> • Universal design for learning • Social and emotional learning • Capacity building for school, community and parent/caregiver engagement • For superintendents and principals in how to develop and implement an early warning system, how to create a school environment that is supportive of students and staff, how to support student health and school wellness • For school personnel responsible for maintaining school facilities around EPA’s School Environmental Health Program, green cleaning and integrated pest management 	<p>ISBE should offer professional development or could link educators with other groups in the field that provide learning opportunities, including many that are free for participants. Groups such as the Alliance for a Healthier Generation and SHAPE America offer a wide range of opportunities, including webinars, podcasts and in-person training sessions.</p>

Additional Comments

In addition to providing the above recommendations, HSC would like to respond directly to questions presented by ISBE in the draft ESSA implementation plan.

Combining Funding Streams: On page six of the draft plan, ISBE requests ideas regarding how funding streams can be combined in order to support each and every child as she or he progresses through school.

Illinois has an important opportunity to expand Medicaid-funded school health services that provide students with access to school health services, including mental health services, for children across the state. Funding for school health services would complement Title I funds for school-wide interventions that support student health. A recent [decision](#) by the Centers for Medicare and Medicaid Services, along with the transition of Illinois' Medicaid population to managed care, present two key opportunities for expanding Medicaid-funded school health services in Illinois. Currently, 45.5 percent of Illinois' children, or 1.5 million children, are enrolled in Medicaid.⁹ These services could include physical, behavioral and mental, and sexual health services, as well as dental and vision, prevention, screening and disease management. It also could include acute and urgent care as well as case management.

In the summer of 2016, the U.S. Department of Education convened a learning collaborative to assist states in developing state strategies to expand the delivery of health services to Medicaid enrolled students. While Illinois did not participate, there is an opportunity to join this autumn. HSC, which is coordinating the technical assistance for this national learning collaborative, is ready and willing to support Illinois in convening a team and developing a strategy.

Stakeholder Engagement: ESSA requires meaningful stakeholder engagement as a part of the process of developing state plans and also recognizes the need to engage parents in school-level planning. Engagement across a broad array of stakeholders is a necessary part of any effort to identify and address social determinants of health and education because a range of social and economic factors may be contributing to student learning and key academic metrics. This requirement for stakeholder engagement is an opportunity for the state, school districts and schools to engage the health sector to leverage knowledge, expertise and access to resources. This should include public health agencies, hospitals, federally qualified health clinics and others. HSC recommends that ISBE adopt a strong stakeholder engagement protocol as articulated by Partners Four. In addition, ISBE should provide training and support to school districts and schools on how to engage the health sector.

Conclusion

HSC is grateful for the opportunity to comment on Illinois' proposed plan to update our state system for educational accountability, school improvement, and educator preparation, support and

⁹ American Academy of Pediatrics: Medicaid Facts - Illinois, March 2015 https://www.aap.org/en-us/Documents/federaladvocacy_medicaidfactsheet_illinois.pdf

retention. HSC applauds Illinois' long-standing commitment to student achievement, health and development and for taking action to support students. We urge you to continue to advance your work by recognizing the importance of social and emotional learning, physical health, improved attendance and other related issues. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.

HEYWORTH COMMUNITY UNIT SCHOOL DISTRICT NO. 4

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October 7, 2016

Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Dear Illinois State Board of Education Member:

As a 30 year veteran in education and the last 11 years as a superintendent, I have seen quite a few federal and state initiatives come and go. Here are some of my thoughts as it pertains to drafting the Illinois ESSA Plan.

- (1) **Minimize compliance and oversight components/maximize school district flexibility**- Whatever the final plan looks like, my hope would be that ISBE will create an ESSA plan that *minimizes* ISBE compliance and oversight components and *maximizes* school district flexibility to create continuous improvement plans unique to each district. Clearly, a “one size fits all” approach doesn’t work in a state as diverse as Illinois. Rural, suburban and urban school districts each have unique needs and goals based on their communities. The Illinois ESSA plan should allow for each school district to meet its unique needs and goals.
- (2) **Don’t reinvent the wheel**- [Public Act 99-193](#) was signed into law in July 2015. This document was created with Illinois legislators, superintendents, school board members, principals, parents and business managers with the express goal of allowing districts to create continuous improvement plans that recognize the unique strengths and diversity of each district. While interpretation of federal ESSA guidelines may dictate some changes, but let’s create the Illinois ESSA plan starting from what has already been agreed upon.
- (3) **College and Career Readiness**- I support the assertion that College and Career Readiness is more than a test score. Here is my specific feedback pertaining to ISBE’s proposal.
 - a. **GPA 2.8 out of 4.0**- This seems reasonable. However, the drawback of using GPA is that teachers grade at different levels of difficulty, so consistency will be all over the place. This makes GPA neither a reliable or valid indicator. The other drawback to using GPA is that it would be easy for teachers and administrators to “game the system” by lowering standards and giving higher grades. There are too many examples of this happening when high stakes are introduced to ignore.
 - b. **Academic Benchmarks/Industry credentials**- Using Industrial Credentials, Dual Credit, Advanced Placement, Algebra II and IB programs seems like a great idea. However, there is a huge zip code disparity in the ability of high schools to find, fund and staff these types of academic programs. In my local area, some high schools have 36 hours of dual credit opportunity while others only have 12 hours based on staffing and funding. This is not equitable. How will the state equalize opportunities for all students and not just those that live in the right zip code?
 - c. **Behavioral and Experiential Benchmarks**- I like the idea of 90% attendance, 25 hours of community service (or military service), workplace learning experience or two or more organized co-curricular activities (including language and fine arts). Adding community service is an excellent way to engage students within the community. However, coordination and oversight of

a community service program would require additional staff. Will the state provide additional funds to pay for such programs?

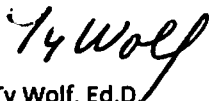
- d. **Inquiry Based Skills-** The Illinois Learning Standards for ELA and Math (e.g., Common Core), Next Generation Science Standards, 3-C Social Science Standards all draw heavily on students ability to critically think and use inquiry-based skills. I think these skills could be assessed at a local level and would be a good inclusion as a factor for College and Career Readiness.
- e. **Soft Skills-** Employers are looking for employees with good "soft skills." Emotional intelligence, collaboration, and social skills are all important in the workplace. I would like to see this skills assessed at a local level and included as a component of College and Career Readiness.

(4) **Implementation-** My experience with ISBE policy changes is that BIG changes are pushed on Districts and staff with minimal amounts of time to implement. This creates frustration and staff morale problems. This has created a negative atmosphere regarding public education in general and has led to huge drops in teacher education candidates at the university level. We are seeing resulting teacher shortages already at the secondary level because there are fewer teacher candidates. When considering implementation, I would hope that ISBE would take a "long-term" view and implement change incrementally rather than require a HUGE overnight change.

(5) **Funding-** It would be my hope that ISBE would channel federal dollars to school districts directly rather than to state or regional organizations for improvement. Going back to the first point in this letter, local school districts have unique and diverse needs based on their communities. Funding should go to the local school district to allow it to use continuous improvement processes to improve and meet its unique needs and goals.

In summary, we have talented and dedicated educators in the state of Illinois. I believe it important to honor them as we seek to improve educational outcomes for all students. As ISBE prepares the State ESSA Plan, I hope that you consider these suggestions. Please contact me if you have further questions.

Best regards,



Ty Wolf, Ed.D.
Superintendent
Heyworth CUSD #4



*"a catalyst for strong families
and powerful communities
where children matter most."*

October 7, 2016

Illinois State Board of Education
100 N. 1st Street
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Thank you for the opportunity to comment on the Illinois State Board of Education's (ISBE) State Plan for the Every Student Succeeds Act (ESSA). Illinois Action for Children (IAFC) is a state wide organization and our mission is to be a catalyst for organizing, developing and supporting strong families and powerful communities where children matter most. Our programmatic focus is on Chicago and Cook County, while our policy and advocacy work is statewide. We administer the Child Care Assistance Program (CCAP) and ExceleRate, the state's Quality Rating and Improvement System, and administer the federally funded Child and Adult Care Food Program (CACFP) for home-based child care providers in Cook County. Additionally, we serve as the Head Start grantee and administer the ISBE Preschool for All (PFA and Prevention Initiative) in the south suburbs of Cook County. Overall, as an organization our efforts respond to local needs with programs that focus on children's earliest and most formative years.

We appreciate the inclusive process of stakeholder engagement and the thoughtfulness that went into the drafting of the state's plan. Our comment will focus on a few areas where we believe minor changes can improve the overall educational experience for children and families across Illinois and truly embrace the intent of the law to provide better early childhood services through our state's education system.

Accountability System

Under previous reauthorizations of the Elementary and Secondary Education Act, Local Education Agencies (LEAs) did not have any true incentive to devote resources to the early years, since accountability centered on assessment scores. ESSA provides the opportunity to shift the emphasis simply from test scores, through the restructuring of the accountability framework. By allowing the state to include non-academic indicators to measure student success or school quality in its accountability system, the opportunity to highlight the early years becomes evident and allowable.

According to ESSA guidelines, when choosing an indicator to measure student success or school quality, the measure must be:¹

- disaggregated by the four major student subgroups (i.e.: economically disadvantaged students, students from major racial and ethnic groups, children with disabilities and English Learners)
- able to aid in the meaningful differentiation among schools
- supported by research that performance/progress is likely to increase student achievement
- comparable across all Local Education Agencies within the state

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Illinois State Board of Education

Based on these requirements, we ask ISBE to incorporate the indicators of **chronic absenteeism** and **Pre-K suspensions and expulsions** into its accountability plan, as we believe they are reliable, research-based measures of student success and school quality.

Chronic Absenteeism

The U.S. Department of Education (ED), recognizing the importance of understanding and addressing chronic absenteeism, calls it a “hidden educational crisis,” as it impacts approximately 1 in every 8 students.^{2,3} By missing valuable time in the classroom, students risk the possibility of falling behind academically. Yet, it does not affect all student subgroups equally as it is especially prevalent among students who belong to vulnerable communities. We believe that tackling chronic absenteeism is a positive strategy toward closing the achievement gap.

Addressing chronic absenteeism from an early age is crucial to ensure our youngest learners are achieving the necessary milestones to succeed in future grades. According to ED, “children who are chronically absent in preschool, kindergarten, and first grade are much less likely to read at grade level by the third grade. Students who cannot read at grade level by the end of third grade are four times more likely than proficient readers to drop out of high school.”⁴ If this is not addressed early on, our most vulnerable students will continue to be left behind, leading to greater academic issues in the future. Yet, we understand that ISBE cannot solve this issue single-handedly; it must be a community-wide effort.

Suspensions and Expulsions

In 2015, the Illinois General Assembly passed a bill to mitigate the overuse of suspensions and expulsions as forms of discipline within the K-12 education system. However, discipline rates are three times higher in early care and education programs.⁵ This is especially concerning because during these critical early years, boys, students of color, English Learners (ELs) and students with disabilities are more likely to be forced out of the classroom versus their peers.⁶

Limiting suspensions and expulsions during the early years are critical so young children do not fall behind academically. Oftentimes, children are harshly disciplined for behavioral issues stemming from traumatic childhood experiences that can be addressed through appropriate mental health supports and services. As a result, suspending or expelling them is usually not the most productive course of action for children’s lifelong learning and success in school.

We respectfully encourage ISBE include pre-k suspension and expulsion rates as a non-academic measure within its accountability system. Suspensions should only be used as a final recourse, as educators should receive training on methods to address students’ challenging behaviors and utilize trauma-informed practices. Children cannot be expected to further develop their educational skills if they are consistently removed from their classroom.

Federal agencies have been closely monitoring chronic absenteeism and rates of suspensions and expulsions. Research shows these issues impede students' ability to progress within their academic setting. If ISBE chooses these measures for accountability purposes, we believe they will provide much needed data on schools to ensure all students across Illinois are receiving a well-rounded education.

Educator Equity

Under our current educational structure, students attending schools in low-income communities are more likely to be taught by inexperienced and out-of-field educators. According to data compiled by ED's Office for Civil Rights, "black students are more than four times as likely, and Latino students twice as likely, as their white peers to attend these schools where 20% or more of their teachers have not yet met all state certification and licensing requirements."⁷ As evidenced, students of color are once again being disproportionately impacted.

These rates of inequality concerning access to qualified and experienced teachers are not acceptable under ESSA. Under the law, the state plan must explain "how low-income and minority children enrolled in schools assisted under [Title I, part A] are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, and the measures the State educational agency will use to evaluate and publically report the progress of the State educational agency with respect to such description."⁸ Through this provision, policymakers are attempting to make a concerted effort to ensure all students have access to quality educators.

Within ISBE's plan, IAFC proposes to slightly alter the definition of "out-of-field teacher" to "a teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license, endorsement **or certification**."⁹ We believe that by including the term "certification," we are being inclusive of the needs of English Learners throughout the state, as they must be taught by an educator with an English as a Second Language (ESL) or Bilingual certificate. Arguably, by altering the definition of "out-of-field teacher," ISBE can also understand how widespread this particular issue is across the state.

Additionally, we are concerned about the mismatch of educators placed in classrooms for which they do not hold the proper credential. It is crucial for educators to be in the appropriate educational space so they can have the most positive impact on their students. Not only this, but by being in the proper classroom setting, teachers and students can thrive together.

Reporting teacher licensure information is required, yet the Illinois state plan does not explain how ISBE will publish these figures. We ask ISBE to disaggregate this information not only for low-income and students of color, but by the four main subgroups of vulnerable students. Disaggregating the data in such a manner will allow the state to "improve within-district equity in the distribution of teachers," as required under ESSA.¹⁰

English Language Proficiency Standards

Across the state, English Learners continue to grow as a subgroup of students. Illinois has experienced a rapid growth of ELs, as they have increased 83 percent over the past 15 years.¹¹ During the 2014-2015 school year, almost 10 percent of all students were classified as ELs.¹² English Learners occupy a particular niche within educational policy, as intensive language supports are necessary for them to efficiently transfer out of these classrooms. It is essential for them to achieve high levels of language competency before transitioning out of the program. IAFC supports ISBE's proposal to raise the overall composite ACCESS score necessary for EL students to "exit" the program, from 5.0 to 5.2.

Furthermore, ESSA stipulates that EL students should be tracked for four years after being reclassified as 'former English Learners.' This is a step in the right direction, but the rule does not go far enough. Due to the high rates of ELs within the state, it is crucial to collect information on this subgroup to track their progression over time. We suggest that ISBE track former EL students' academic progress throughout high school. This will allow us to ensure that English Learners continue to progress long after exiting language services and that as a state, we are providing them with the proper support services to graduate high school and be college or career ready.

Supporting Education through Title II Funds

Under the Every Student Succeeds Act, Title II funds are provided to "support principals, teachers, early childhood educators, and program administrators to develop solutions for school transitions and school readiness."¹³ Title II offers Illinois the opportunity to better align the pre-k and K-12 curriculums for a more seamless transition for young children. Currently, the early childhood and K-12 systems do not adequately communicate with one another, leading to a significant disconnect. If the curriculums were better aligned, LEAs would be able to build upon the skills and abilities young children developed in their early education program as they transition to the higher grades.

Due to the high number of English Learners across the entire state, there is also a demand for teachers with ESL or Bilingual Certifications. As a state, we must search for effective methods to recruit additional teachers to pursue these certifications. As mentioned earlier, the number of EL students has risen quickly and it will likely continue. An additional option for ISBE could be to create an ESL or Bilingual credential at the Associate Degree level, which could prompt higher numbers of individuals to pursue it. Regardless, the shortage of teachers with these certifications must be addressed sooner than later to provide our students with the proper academic supports.

Targeted Assistance School Program

Under the Targeted Assistance School Program, states may provide additional monetary assistance to schools whose students are not achieving at the rates expected. A school is identified as needing targeted assistance when a subgroup of students is "consistently underperforming" based on the indicators in the accountability system.¹⁴ ESSA states that districts may "coordinate with and support the regular education program, which may include services to assist preschool children in the

transition from early childhood education programs such as Head Start, the literacy program [in Title I, part A], or State-run preschool programs to elementary school programs."¹⁵

We ask ISBE to encourage districts to use these program funds to assist young students in the transition from their early education program to the K-12 system. As mentioned above, there is a strong disconnect between the two systems, which must be addressed to maximize student growth. By supporting transition services, students will have the opportunity to further build upon the skills developed in their preschool program.

An additional step must be taken beyond searching for ways to better align the early and elementary education systems. For districts with schools that qualify for the Targeted Assistance School Program, an early education needs assessment is needed. Early childhood programs are crucial to children's development, so local districts must examine the distribution of resources among the programs. Resource equity should be a point of interest not only for the district, but for the state board as well. It is a method to ensure that all children are receiving comparable educational supports and vulnerable subgroups are not being left behind.

Children & Families Experiencing Homelessness

Addressing the needs of children and families experiencing homelessness has been a focal point in various federal policies as of late. Based on ED figures, student homelessness doubled from 679,724 during the 2006-2007 academic year to 1,301,239 during the 2013-2014 academic year.¹⁶ Policymakers have attempted to further address this issue through ESSA by including rules and guidance for LEAs to assist families.

We support ISBE's commitment in having liaisons work with "community social service agencies and Continuum of Care programs."¹⁷ Through partnerships, liaisons have the opportunity to build strong relations and conduct greater outreach in searching for and identifying children and families experiencing homelessness. Strong community relationships are crucial in order to provide the family referrals to all the possible resources they may need.

However, we believe ISBE does not provide enough concrete details regarding its plan for providing assistance to children and families experiencing homelessness. The state board is required to ensure that young children experiencing homelessness are immediately placed in the appropriate early childhood program at their "school of origin." Yet there are no clear guidelines describing how homeless liaisons at any level should go about assisting the child and family to accomplish this objective. The plan also declares that "all school personnel will gain a better understanding of the specific needs of homeless children and youths by participating in ongoing trainings."¹⁸ However, the state board does not provide details on the types of trainings or how often they will occur. We urge ISBE to layout clear details to tackle student homelessness in its next draft of the state plan.

Illinois Action for Children would like to once again thank the Illinois State Board of Education for the opportunity to comment on the Illinois State Plan for the Every Student Succeeds Act. We believe the department is committed to providing a high-quality education to all students across the state. The few changes we recommend in our comments would go a long way toward improving the educational experience for children and families. We look forward to our continued efforts to support working families across Illinois.

Sincerely,



Sessy Nyman
Vice President of Policy & Strategic Partnerships
Illinois Action for Children

¹ (Illinois State Board of Education 2016)

² (United States Department of Education n.d.)

³ Ibid.

⁴ Ibid.

⁵ (U.S. Department of Health and Human Services and U.S. Department of Education 2015)

⁶ (U.S. Department of Education Office for Civil Rights 2014), School Discipline

⁷ (U.S. Department of Education Office for Civil Rights 2014), Teacher Equity

⁸ Every Student Succeeds Act of 2015

⁹ ISBE., 39

¹⁰ESSA, 127

¹¹ (Latino Policy Forum n.d.)

¹² (Illinois State Board of Education 2015), ELs

¹³ (Partners for Each and Every Child 2016)

¹⁴ Ibid., 21.

¹⁵ ISBE., 66.

¹⁶ (U.S. Department of Education 2016)

¹⁷ ISBE., 77.

¹⁸ Ibid., 79.



Comments Regarding ESSA State Plan Draft #1

<p>Combination of Funding Streams</p>	<p>When the IDEA was initially passed as PL 94-142, Congress promised to fund 40% of the cost of special education. IDEA currently funds less than 20% of the cost. Districts in Illinois spend millions of dollars of local revenue annually to offset what was promised by Congress and what is not funded by the state. The IAASE is opposed to “braiding” of IDEA funds if the result will be erosion of dedicated funds for students with disabilities.</p>
<p>Academic Assessments</p>	<p>While there are obvious benefits to providing all high school juniors access to a college entrance exam, the move away from PARCC to SAT at the high school level is a step backwards for students with disabilities in terms of access to accommodations. The IAASE urges ISBE to prioritize the needs of students with disabilities at the onset of any assessment decision. It should be required that Universal Design for Learning be incorporated in any state-adopted assessments. If an assessment needs to be retrofitted with accessibility features, it must be done in consultation with members of the field.</p> <p>The ISBE needs to consider innovative assessment strategies that better meet the needs of students with disabilities. The current options of DLM or PARCC/SAT are too restrictive for our students. There is a large group of students with disabilities who do not meet the significant cognitive disability threshold of DLM, but who do not have meaningful participation in the standard assessment, even with accommodations. Special Education teachers across the state share stories of students having behavioral outbursts, crying, refusing, or having similarly negative experiences with the state assessment. As we exit the NCLB era, we must seize the opportunity to offer a better system for our students with disabilities.</p> <p>Because of the difficulty insuring appropriate accommodations for all learners on College Entrance Exams, the IAASE does not support allowing the local choice option allowing districts to choose between them for State Assessment. We believe the focus and resources of the state should be on improving the accommodations available on the assessment that is awarded a contract by the state and that all districts should use that assessment so that all students have access to the same accommodations.</p>
<p>Accountability System & Identification of Schools</p>	<p>The IAASE is concerned that the College and Career Ready Indicator Framework, particularly the behavioral and experiential benchmarks, may be unfairly limiting for students with disabilities. Further, Illinois is the least equitable state in the nation in school funding and districts with fewer resources will be less able to provide opportunities for their students to achieve the indicators in this framework (i.e.: co-curricular activities). The Redefining Ready campaign launched by AASA is clearly the basis for this work. The ISBE version is too restrictive and does not recognize the needs of our schools and our students.</p>

IAASE Illinois Alliance of Administrators of Special Education



A subdivision of the Council of Administrators of Special Education
1324 Lantern Lights Circle, Lebanon, IL 62254

<http://www.iaase.org>

	<p>As ISBE considers the accountability system, the IAASE urges Illinois not to repeat the errors of the previous system. The students with disabilities subgroup was often the first in a school not to make AYP and was “blamed” for a schools “failure”. Appropriate accommodations for these students must be embedded in all facets of the ESSA plan.</p> <p>When considering growth within the subgroup of students with disabilities, it is important to recognize the nature of special education eligibility. When students reach grade level performance or the deficit has been remediated, they are often dismissed from services and no longer eligible for special education. Therefore, students who show significant growth are removed from the subgroup. The IAASE is opposed to a model that has the unintended consequence of influencing IEP teams to continue eligibility for high performing students because of the benefit to the subgroup. Significant conversations should occur around the concept of “consistently underperforming” subgroups as it relates to students with disabilities.</p> <p>Student group performance on relevant indicators should not be compared to state averages for “all students,” but rather to the comparable student group.</p> <p>When measuring growth, the model and tools we use must be sensitive enough to show smaller increments of growth for specific cohorts of students who grow in smaller increments. Growth measures should not just compare apples to apples, they must compare granny smith to granny smith and braeburn to braeburn.</p> <p>A subset of students with disabilities access high school programs until the day before their 22nd birthday. The high school graduation rate calculation must capture these students in a way that does not penalize schools for providing services they are legally obligated to provide.</p>
Resource Allocation Review	<p>While a periodic resource allocation review is noble, the question in Illinois is not IF equity gaps exist. Gaps DO exist. The question is what will be done about it and there is no indication from the draft plan that a plan is in place to address that much more important question.</p>
Support For Educators	<p>The IAASE strongly supports professional development programs that enhance the skills of educators to meet the needs of students with disabilities, mental health concerns, and other behavioral health concerns within the general education program.</p>

October 5, 2016

Superintendent Tony Smith, Ph.D.
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Response to Illinois State Board of Education’s ESSA State Draft Plan #1

Dear Dr. Smith,

Thank you for the opportunity to respond to the first draft of the state’s plan for implementation of the Every Student Succeeds Act (ESSA).

The Illinois Alliance to Prevent Obesity (IAPO) is a statewide coalition of over 140 organizations working to reduce obesity trends in Illinois by 2018 through comprehensive policy, systems, and environmental change strategies and interventions as outlined in the coalition’s State Action Roadmap. Several of IAPO’s long-term goals align with ESSA’s recognition of the need for schools to support the whole child, specifically the importance of promoting physical and mental health and wellness, including:

- Implementing nutrition standards for school meals and competitive foods in all Illinois schools and after-school programs.
- Supporting initiatives to integrate physical activity into the school day, including daily high-quality enhanced physical education, daily recess, classroom education that includes physical activity, and extracurricular physical activity programs.

The implementation of ESSA provides an important opportunity to more fully integrate student and school health into education policy and practice and support the integral connection between health and learning.

In our comments, IAPO provides recommendations to the Illinois State Board of Education (ISBE) on improving the state plan, responses to the questions raised in the proposed Illinois state plan, and supplemental background information to justify our recommendations. Additional information is available upon request.

ISBE has already recognized the connection between student health and education and has made important strides in supporting social and emotional learning, and physical health and wellness. We urge you seize the new opportunity presented by the implementation of ESSA to further support student health and school wellness.

We appreciate the opportunity to comment on the revised draft and welcome the opportunity to discuss these recommendations with you. We look forward to seeing ESSA fully implemented so that every child is in school and ready to learn.

Sincerely,

Elissa Bassler, CEO
Illinois Public Health Institute
Executive Director
Illinois Alliance to Prevent Obesity



Leadership Council

- Active Transportation Alliance
- American Association of Retired Persons (AARP) Illinois
- American Cancer Society, Illinois Division
- American Heart Association, Midwest Affiliate
- American Lung Association of Illinois
- American Medical Association
- Blue Cross Blue Shield of Illinois
- Building a Healthier Chicago
- Chicago Department of Public Health
- Chicago Hispanic Health Coalition
- Consortium to Lower Obesity in Chicago Children (CLOCC)
- Cook County Department of Public Health
- DuPage County FORWARD Initiative
- Heartland Human Care Services
- Illinois Academy of Family Physicians
- Illinois Action for Children
- Illinois African American Coalition for Prevention
- Illinois Association for Health, Physical Education, Recreation and Dance
- Illinois Association of School Nurses
- Illinois Association of Public Health Administrators
- Illinois Chapter, American Academy of Pediatrics
- Illinois Dietetic Association
- Illinois Department of Public Health
- Illinois Hospital Association
- Illinois Local Food & Farm Coalition
- Illinois Maternal and Child Health Coalition
- Illinois Public Health Association
- Illinois Public Health Institute
- Illinois State Alliance of YMCAs
- Midwest Business Group on Health
- Northern Illinois Public Health Consortium
- Ounce of Prevention Fund
- Salud Latina/Latino Health
- Southern Illinois Healthcare
- University of Illinois at Chicago Health Policy Center
- University of Illinois at Chicago School of Public Health
- Voices for Illinois Children
- YMCA of Metropolitan Chicago

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Executive Summary: IAPO Recommendations

The Every Student Succeeds Act (ESSA) presents a new opportunity for schools to address student health and wellness. While both the No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting the physical and mental health and wellness of students.

IAPO recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school reports cards. The accountability system and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, IAPO recommends:

- Using the **aggregate fitness testing scores as an accountability measure for school quality and as an indicator on the school report card**. IAPO also recommends that ISBE provide technical assistance and guidance to school districts on comprehensive needs assessments that consider factors related to nutrition, physical education and physical activity, use evidence-based interventions designed to address identified needs, and recommend professional development for educators on optimally addressing the needs of students.
- Including other **health-related indicators on school report cards** to illustrate various aspects of a healthy school environment.
- **Designing assessments for health, physical education, and social emotional learning** that are aligned with the state's existing (or emerging) standards to ensure that school districts are offering students a well-rounded education. IAPO also recommends ISBE use existing tools to have schools self-evaluate the strength of their wellness policies.
- Creating **supportive environments to promote staff wellness**, reduce stress, and improve teacher satisfaction and retention.

IAPO recommendations are related to the following sections of Illinois' proposed plan, as well as sections that are pending public comment, including those related to accountability measures.

Organized by content areas, IAPO recommendations will focus on:

	Standards and Assessments	Accountability System	Report Cards	Needs Assessments	School Improvement/ Evidence-Based Interventions	Professional Development
Student Fitness/Access to Physical Activity	✓	✓	✓	✓	✓	✓
Social-Emotional	✓			✓	✓	✓

Learning						
Other health-related factors including access to health professionals and optimal facilities			✓	✓	✓	✓
Optimizing Working Conditions for Staff			✓	✓	✓	
Ensuring a Well-Rounded Education				✓	✓	✓

Introduction: Illinois Should Integrate Health and Wellness Into Education Policy and Practice

The Learning-Health Connection

The link between health and learning is clear: healthy, active, and well-nourished children are more likely to attend school, be ready to learn and stay engaged in class.

Despite widespread agreement on these facts, many school environments lack the resources and support to comprehensively promote health. Too many students do not have access to high-quality daily P.E., opportunities for physical activity and nutritious food. Many students come to school with one or more health problems that impact their ability to learn. According to the U.S. Centers for Disease Control and Prevention (CDC), the incidence of chronic diseases—including asthma, obesity, and diabetes—has doubled among children over the past several decades. This has implications not only for children’s long-term health but also for their opportunities to learn and succeed at school. Just as important, students that learn and adopt healthy habits and behaviors in school enjoy improved academic and behavioral outcomes in school and are positioned to realize the lifetime benefits of proper nutrition and physical fitness.

This challenge is especially critical in light of the nation’s vast health and educational disparities. Low-income and minority students are at increased risk of health problems that hinder learning. These students are more likely to attend schools with unhealthy environments and that do not invest in evidence-based prevention. Unless we address these disparities in health status and school environments, efforts to close the education achievement gap will fall short.

Illinois Policy Recognizes the Importance of Student Health and Wellness

The State of Illinois recognizes the inextricable link between health and learning. Existing state policies

require or encourage schools to address a range of issues including social and emotional learning, physical education and fitness, and nutrition. In fact, one of the goals of the current state plan is for every school to offer a safe and healthy learning environment for all students.

Social and Emotional Learning: The Children’s Mental Health Act of 2003 required the Illinois State Board of Education (ISBE) to "develop and implement a plan to incorporate social and emotional development standards as part of the Illinois Learning Standards." Accordingly, Illinois became the first state in the country to adopt Social and Emotional Learning (SEL) standards spanning all grade levels. These ten standards seek to promote mental wellness, prevent mental health issues, improve school connectedness, reduce student absenteeism and suspensions, and improve academic outcomes. Additionally, ISBE has required school districts to administer the 5Essentials Survey in order to identify indicators that positively affect student success, including “effective leaders,” “collaborative teachers,” “involved families,” “supportive environments,” and “ambitious instruction.”

Physical Education: Illinois has been a leader in valuing children’s health, long requiring daily physical education (P.E.) for students in grades K-12. Since 2012, ISBE and the Illinois Department of Public Health have worked to promote “enhanced physical education,” an evidence-based strategy recommended by the CDC’s Community Guide to increase activity levels in or the length of school-based P.E. classes.

This work is based on the Illinois Enhanced P.E. Strategic Plan, a high-level roadmap to increase school-based P.E. and inspire a culture shift that makes high quality P.E. and wellness a priority for all schools and children. The movement is driven by a new understanding that high-quality P.E. is as important as math, science, or any other core subject because it correlates directly to the health and well-being of students for the rest of their lives.

As part of this work, in 2012, Public Act 97-1102 established the Illinois Enhance P.E. Task Force (EPETF), charged with promoting and recommending enhanced P.E. programs that could be integrated with broader wellness strategies and health curriculum in elementary and secondary schools, and revising the State Learning Standards on Physical Development & Health to reflect the rich body of neuroscience on the connection between movement and improved student outcomes, as well as them bringing them into alignment with current best practices.

One of the EPETF’s recommendations was to develop and utilize metrics to assess the impact of enhanced P.E. and measure the effectiveness of State Goal 20 of the Illinois Learning Standards for Physical Development and Health, which is to help students to achieve and maintain a health -enhancing level of physical fitness based upon continual self –assessments. This recommendation led to advocacy for Public Act 98-0859, which was enacted to implement fitness testing in Illinois starting in the 2016-17 school year.

Further demonstrating the state’s commitment to the whole child, in 2011 Illinois recognized the need to incorporate health and wellness measures into the school report card by, as of 2016, requiring all Illinois public schools to report the average number of days of P.E. they provide per week per student.

Physical Activity: While physical activity (PA) is different from P.E. in that P.E. is a planned sequence of developmentally appropriate activities and games that educates students about and through movement, and is taught by qualified teachers who assess student knowledge, and motor and social skills to establish and sustain a healthy lifestyle, a school environment that provides comprehensive opportunities for PA before, during and after the school day is critical to ensuring students get the

recommended 60 minutes of PA per day, as recommended in the [Physical Activity Guidelines for Americans](#).

In 2007, ISBE codified this by establishing a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that addresses nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy.

ESSA: A new opportunity to supporting student health and wellness

ESSA presents a new opportunity for schools to address student health and wellness. While both No Child Left Behind (NCLB) and ESSA share the goal of improving academic performance, ESSA offers a different pathway, one that explicitly and implicitly recognizes the need for schools to support the whole child. ESSA specifically acknowledges the importance of supporting student physical and mental health and wellness.

Given the importance of student health and the key role that schools can play in promoting student health and wellness, incorporating health and wellness into Illinois' state plan in a comprehensive and integrated fashion will provide educators, policymakers and the public with a more complete understanding of how student health and wellness are impacting learning and academic outcomes and can serve as a decision-making compass, not stigmatizing parents and students or blaming districts/educators, but, rather, helping schools and school districts effectively drive improvement strategies. If accountability systems recognized the full experience of a student—including health conditions that might impede learning—educators could develop a more comprehensive understanding of student performance, and could deploy resources to schools and students at greatest risk. Parents and community members also benefit from knowing more about how their schools are supporting and promoting student health and well-being.

IAPO Responds to Illinois' Proposed State Plan: *Expanding the Opportunity for Illinois to Support Optimal Student Achievement, Development, and Health*

IAPO recommends incorporating student health and school wellness into Illinois' state plan through the accountability system and school reports cards. The accountability system and report cards should be supported by needs assessments that consider health and wellness, and that identify evidence-based policies, practices, and programs that lead to school improvement. Educators should be provided appropriate professional development to support their efforts to better meet the needs of the whole child. This comprehensive approach will create a state plan that is supportive to school districts and schools, and most importantly, students. Toward that end, IAPO recommends:

- Using the **aggregate student fitness scores as an accountability measure for school quality**. IAPO also recommends that ISBE provide technical assistance and guidance to school districts on comprehensive needs assessments that consider factors related to nutrition, physical education and physical activity, use evidence-based interventions designed to address identified needs, and recommend professional development for educators on optimally addressing the needs of students.
- Including other **health-related indicators on school report cards** to illustrate various aspects of a healthy school environment.
- **Designing assessments for health, physical education, and social emotional learning** that are aligned with the state's existing (or emerging) standards to ensure that school districts are

offering students a well-rounded education. IAPO also recommends ISBE use existing tools to have schools self-evaluate the strength of their wellness policies.

- Creating **supportive environments to promote staff wellness**, reduce stress, and improve teacher satisfaction and retention.

These recommendations are described in greater detail below, aligned by the sections of the Illinois proposed plan.

Challenging Academic Standards and Academic Assessments (Proposed Illinois State Plan, p. 6): Expanding to Include Assessments of Health-Related Standards

ESSA requires schools to offer students a “well-rounded education.” The definition of well-rounded education includes health education, nutrition education, and physical education. In addition, each state plan must provide an assurance that the state has adopted challenging academic content and high quality student academic assessments in a number of subjects like math, reading or language arts and science and may develop standards and implement assessments in other subjects.

Given that Illinois already has standards for social emotional learning, health education, and physical education, IAPO recommends implementing assessments for these areas. Developing assessments on these content areas will support the collection of statewide data and assist educators in understanding the importance of competency in these areas on overall academic performance. Additionally, having data on the effect of instruction on student acquisition of knowledge and skills, based on state standards, will better equip Illinois and school districts with critical information about resource allocation and professional support in these content areas. We do not recommend that these assessments be used in state accountability systems or in a punitive manner; rather these assessments should be used to improve teaching and learning in these critical content areas.

***Illinois’ Accountability Support and Improvement for Schools
Accountability System and Indicators (Proposed Illinois State Plan, pp. 13-22): Include Chronic Absenteeism and Student Fitness as Measures of School Quality and Student Success***

Based on the correlation with student achievement and ability to provide actionable information to educators to improve school environments, IAPO recommends that the state accountability system use district reporting on the number of students that score within the Healthy Fitness Zone (HFZ) for the fitness tests the state is requiring as of the 2016-17 school year as one of the indicators of school quality and student success.

Rationale: Beginning in 2016-17, all Illinois schools are required to administer, using the Fitnessgram protocols, and report fitness assessment data for the following components of fitness: aerobic capacity, muscular strength, muscular endurance and flexibility.

The proposed indicator meets the US Department of Education’s proposed requirements for these measures, as shown below.

Table 2: Proposed Accountability Measures Meet US Department of Education’s Proposed Requirements

	Fitness assessment data
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<i>Is valid, reliable and comparable across all LEAs in the state</i>	✓
<i>Can be disaggregated for each subgroup of students</i>	✓
<i>Includes a different measure than the state uses for any other indicator</i>	✓
<i>Is supported by research finding a connection to student achievement</i>	✓
<i>Aids in meaningful differentiation among schools by demonstrating varied results across schools</i>	✓

ISBE also stated it wants to consider items that are within the schools’ nexus of control. This is an important point in regards to HFZ data. Public Act 98-059 specifically prohibited using fitness scores to grade students or evaluate teachers because there are many factors that influence a student’s fitness levels outside of P.E. However, assessing a students’ fitness levels and improvement over time can provide important information for schools and educators to make adjustments to programs to better meet student needs.

Student Fitness: IAPO recommends that a physical fitness measurement be included as an accountability measure to assess school quality and student success.

According to the [Physical Activity Guidelines for Americans](#), children require 60 minutes of physical activity daily for optimum health and well-being, and physical activity has been correlated with positive academic achievement and behavior, including grades and standardized test scores. Schools can promote physical activity before, during, and after school to ensure that their students are ready to learn.

The cornerstone of a Comprehensive School Physical Activity Program (CSPAP) is high-quality PE, which provides an equitable opportunity for all students to be physically active in school. Illinois has existing PE state standards and recently adopted a policy that requires school districts to use Fitnessgram assessments to measure students’ progress towards the state standard for personal fitness assessment, as well as to assess student progress in aerobic capacity, flexibility, muscular endurance, and muscular strength. School districts are required to report aggregate data to ISBE by May 1st of each year.

IAPO recommends ISBE leverage the aggregate fitness assessment data as an accountability measure to assess school quality and student success over time. As data systems are developed, ISBE should also include the year-to-year differences in district reporting of the number of students that score within the Healthy Fitness Zone for the required fitness tests on the school report cards to track improvements over time.

Illinois’ State Report Card: Maintain Existing Health-Related Measures and Add Additional Measures

IAPO recommendations around school report cards are designed to reinforce and provide parents and others with information that creates a more comprehensive picture of a school’s efforts for continual improvement around attendance and student fitness.

Illinois currently includes measures about physical education on the school report card, which IAPO supports maintaining. In addition, IAPO recommends that ISBE include additional measures on school

report cards which relate to and/or informs student health and fitness. These potential additional measures could include but are not limited to:

- Daily recess offered
- School breakfast participation
- Policies for requiring physical activity or movement during the day (such as after 20 minutes of continuous sitting)
- Policies encouraging students to bike or walk to school
- Average class size for physical education, by grade
- Number of qualified PE teachers
- Students granted physical education waivers
- Percentage of students with disabilities that participate actively in physical education classes.
- Strength of the wellness policy

As of 2007, Illinois established a state goal, based on the requirements of Public Act 094-0199, that all public school districts must have a locally-developed wellness policy that address nutrition guidelines for all foods sold on the school campus during the school day, nutrition education and physical activity. Additionally, following implementation of the policy, schools are required to create a plan to measure the implementation of the policy. IAPO recommends that ISBE integrate an indicator of the strength of the wellness policy, using a nationally recognized tool for measuring the strength of wellness policies, in the school report card.

State Support and Improvement of Low-Performing Schools (p. 27-30): Ensure Rigorous and Comprehensive Needs Assessments and Evidence-Based Interventions

Comprehensive Needs Assessments Should Assess Opportunities for Physical Activity in Schools and Design Evidence-Based Interventions Based on Findings

Comprehensive needs assessments should identify opportunities to promote optimal achievement, youth development, and health. For example, by assessing student fitness outcomes, schools can make adjustments to P.E. programs to better meet student needs or determine whether or not they need to increase the opportunities for students to be physically active before, during, and after school. ISBE can provide technical assistance and support to schools in identifying their priority areas for focus and intervention by first encouraging schools to undertake a baseline needs assessment. Fortunately, several publicly available tools also provide guidance on action planning to make improvements in the school environment. These tools include:

- The CDC's [School Health Index](#), specifically the Physical Education and Other Physical Activity Programs module (Module 3).
- The [Let's Move Active Schools](#) baseline assessment (schools will have to first register for Let's Move Active Schools).
- The [Alliance for a Healthier Generation Healthy Schools Program](#) assessment.

Both the Let's Move Active Schools and the Alliance for a Healthier Generation's assessments mirror the School Health Index. Schools might already have engaged in one of these assessments within the two previous school years. Conducting these assessments assist schools by helping them create action plans, and connect them to resources, funding opportunities, and potentially for national recognition.

IAPO recommends that ISBE promote Enhanced Physical Education (EPE), an evidence-based intervention recommended in the CDC's Guide to Community Prevention Services, which is defined as programs that increase the length of, or activity levels in, school-based physical education classes. IAPO

also recommends that ISBE promote the CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school.

Additionally, IAPO recommends that needs assessments ask schools if they are eligible for the “Community Eligibility Provision” for school lunch programs, and if they are, if they are taking the option. Including this question about the provision will help schools identify potential food and nutrition benefits for their students that they can leverage to promote health.

Supporting Excellent Educators: Systems of Educator Development, Retention, Advancement, and Support (pp. 33-41): Preparing Educators to Support Students’ Achievement and Health

As schools refine their approaches to addressing the needs of all learners, educators will require supplemental training methods for promoting high-quality EPE programs and school environments that maximize opportunities for physical activity and nutrition education. Although ISBE proposed a list of potential professional learning opportunities, other emerging issues might also be added to the proposed list and some topics seemed redundant.

ISBE should support schools’ adoption of physical activity policies and practices by encouraging professional development on these content areas. Professional development opportunities to consider include:

- Professional development opportunities for administrators to help them understand and communicate the movement/improved learning outcomes connection, as well as the way that is linked to fitness testing.
- Professional development opportunities for physical educators on implementing high quality PE programs.
- Professional development resources for integrating physical activity in the classroom.

ISBE should offer professional development or could link educators with other groups in the field that provide learning opportunities, including many that are free for participants. Groups such as the Alliance for a Healthier Generation and SHAPE America offer a wide range of opportunities, including webinars, podcasts, and in-person training sessions.

Table 3: Summary of Recommendations for Accountability Measure, School Report Card Measures, Needs Assessment, Evidence-Based Practices and Professional Development

	Recommendations
Accountability Measure	Aggregate student fitness scores
School Report Card	<ul style="list-style-type: none"> • Percentage of students in HFZ for required fitness tests • # of day of PE (Already included) • Daily recess offered • Policies for requiring physical activity or movement during the day • Policies encouraging students to bike or walk to school • Average class size for physical education, by grade • Number of qualified PE teachers

	<ul style="list-style-type: none"> • Students granted physical education waivers • % of students with disabilities that participate actively in physical education classes. • Strength of a school’s wellness policy
Needs Assessment	<p>One of the following:</p> <ul style="list-style-type: none"> • The CDC’s School Health Index, specifically the Physical Education and Other Physical Activity Programs module (Module 3). • The Let’s Move Active Schools baseline assessment • The Alliance for a Healthier Generation Healthy Schools Program assessment.
Evidence-Based Interventions	<ul style="list-style-type: none"> • CDC’s CSPAP, which is the most comprehensive, widely recognized, and commonly accepted intervention to improve physical activity environments in schools and thus, opportunities for students to be physically active before, during, and after school • Enhanced Physical Education, includes details on specific evidence-based interventions recommended in the CDC’s <i>Guide to Community Prevention Services</i>
Professional Development	<p>ISBE should support schools’ adoption of physical activity policies and practices by encouraging professional development on these content areas. Professional development opportunities to consider include:</p> <ul style="list-style-type: none"> • Professional development opportunities for administrators to help them understand and communicate the movement/improved learning outcomes connection, as well as the way that is linked to fitness testing. • Professional development opportunities for physical educators on implementing high quality EPE programs. • Professional development resources for integrating physical activity in the classroom. <p>ISBE should offer professional development or could link educators with other groups in the field that provide learning opportunities, including many that are free for participants. Groups such as the Alliance for a Healthier Generation and SHAPE America offer a wide range of opportunities, including webinars, podcasts, and in-person training sessions.</p>

Conclusion

IAPO is grateful for the opportunity to comment on Illinois’ proposed plan to update our state system for educational accountability, school improvement, and educator preparation, support, and retention. IAPO applauds Illinois’ long-standing commitment to student achievement, health, and development and for taking action to support students. We urge you to continue to advance your work by recognizing the importance of social and emotional learning, physical health, improved attendance, and other related issues. We look forward to your leadership on these critical issues and stand ready to assist in any way possible.

Recommendations of the Illinois Association for Gifted Children to the Illinois State Board of Education Regarding Implementation of ESSA

Introduction

The Every Student Succeeds Act (ESSA) represents a watershed shift from No Child Left Behind policies that focused almost exclusively on identifying and remediating deficits. The clear intent of ESSA is to rebalance America's system of public education to ensure that all students have opportunities to learn every day and grow to their full potential.

Gifted and academically advanced students, who require significantly modified curriculum, instruction, and support systems to maintain their academic growth and develop their talents, have been neglected in the No Child Left Behind era that began in 2001 and that will draw to a close with full implementation of ESSA. Illinois' system of gifted education has suffered critical deterioration over the past decade due to the unintended consequences of NCLB and a lack of state funding for gifted education and talent development programming. According to ISBE's last official report on gifted education, published in 2003, 85% of school districts then offered elementary gifted education programming, and almost 79% offered services for gifted students at the middle school level. However, a study conducted by One Chance Illinois (Dwyer & Welch, 2016) recently found that only 27% of districts now report offering gifted education programming at any grade level.

Consequently, Illinois earned an overall grade of "D-" from the Jack Kent Cooke Foundation for its support for developing academic excellence in its report, "Equal Talents, Unequal Opportunities: A Report Card on State Support for Academically Talented Low-Income Students" (2015). This means Illinois is missing the opportunity to fully develop the talent of tens of thousands of promising learners and is setting gifted students on a path to underachievement at a time when human talent, more than any other resource, will determine the future of our state and its communities.

The Illinois Association for Gifted Children (IAGC) believes ISBE has a once-in-a-generation opportunity to leverage the implementation of ESSA to reverse this decline and make Illinois K-12 schools incubators of talent able to develop the next generation of leaders and innovators. For the first time, federal law now provides states with opportunities to use federal funds to support talent development-focused programming and train teachers to recognize and develop the potential of diverse students. ESSA directs states to ensure that educators receive training in meeting the needs of gifted students and that the diversity and academic growth of gifted students are visible in school accountability frameworks.

Following are a set of recommendations developed by IAGC for ISBE's consideration in the rulemaking and planning process for implementing the Every Student Succeeds Act. IAGC would be pleased to work collaboratively with ISBE to through the ESSA implementation process and to provide additional details and background research in support of these recommendations.

Recommendations Regarding ESSA Title I Changes:

❖ IAGC Recommendations for Monitoring Student Growth and Accountability

- Create a gifted education “gifted services index” for school districts to highlight schools that excel in providing gifted education services and to reveal gaps to help state leaders and individual families make informed educational decisions.
 - Publish the “gifted services index” on the Illinois Report Card site.
- IAGC recommends this indicator be philosophically modeled after the the Jack Kent Cooke Foundation report, *Equal Talents, Unequal Opportunities: A Report Card on State Support for Academically Talented Low-Income Students*, adapting relevant statewide indicators to the district level.
- IAGC recommends that the district “gifted services index” be based on the following metrics:
 - The percentage of all enrolled district students qualifying for one or more gifted education services
 - The percentage of district students assessed for possible placement in a gifted education or advanced academic program
 - The percentage of district students receiving instruction directly from a teacher who holds a gifted education endorsement
 - The “gap” between the percentage of economically disadvantaged students and percentage of non-economically disadvantaged students identified as gifted.
 - The percentage of district students served by one or more of the following research-supported academic talent development opportunities:
 - Whole grade or single subject academic acceleration (e.g. students who are learning full time in a setting with older peers and students who are taking one or more individual courses at a higher grade level than is age typical)
 - Enrichment programming provided to students identified as gifted by a teacher with a gifted education endorsement
 - Academically advanced courses including:
 - ◆ Advanced courses taught by a teacher with a gifted endorsement
 - ◆ College Board-approved Advanced Placement and Pre-AP courses

- ◆ Middle school students enrolled in courses offered for high school credit
 - ◆ Dual enrollment courses taught by community college, college, or university faculty for dual credit in high school and college
- The “gap” between the percentage of economically disadvantaged students and percentage of non-economically disadvantaged students participating in one or more of the advanced learning options listed above
 - The percentage of all enrolled students scoring at the “exceeds expectations” (Level 5) level on the state achievement assessment
 - The gap between the percentage of economically disadvantaged students and non-economically disadvantaged students scoring at the “exceeds expectations” level on the state achievement assessment
 - The percentage of students from economically disadvantaged backgrounds attaining “college ready” benchmark scores on the ACT or SAT.
 - The percentage of economically disadvantaged students who attain a score of 3 or higher on one or more AP Exams or earn IB diplomas
 - The percentage of high school students identified as National Merit Semifinalists or attaining one or more other highly selective honors meriting special recognition to be determined by ISBE in consultation with the Gifted Advisory Board.
- To ensure gifted identification statistics are valid and fair, IAGC recommends ISBE develop guidelines for categorizing a student as gifted and require districts to publish online local policies and procedures for gifted identification and placement in advanced learning opportunities, including procedures for requesting assessment for gifted identification and academic acceleration.
 - To ensure that test-based accountability does not create an unintended disincentive to appropriate use of early entrance, subject acceleration, and whole grade acceleration, IAGC recommends ISBE develop a “credit” to adjust the impact of accelerated students’ test scores on overall school and district ratings. To ensure appropriate use of acceleration, IAGC recommends awarding this adjustment only when students are accelerated using ISBE approved acceleration policies and procedures. IAGC further recommends ISBE develop a model acceleration policy based on Ohio’s Model Acceleration Policy for Advanced Learners and NAGC’s Guide to Developing an Acceleration Policy.

- To ensure that state testing appropriately monitors gifted students' growth, IAGC recommends ISBE take advantage of new flexibility in ESSA to utilize computer adaptive assessment and allow alternative assessment using above-grade-level testing.
 - IAGC recommends that a growth-based measure be incorporated into the gifted services index once it is determined that statewide assessments have adequate range to provide a valid estimate of gifted students' growth to be calculated.

❖ **IAGC Recommendations on The Use of Title II Funds to Build Educator Capacity to Serve Gifted Children**

- To build educator capacity to effectively serve gifted children and address new mandates in ESSA regarding gifted education, IAGC recommends that the state of Illinois designate at least 5% of Title II funds it receives to aid school districts serving significant numbers of low income students in accessing professional development on serving diverse gifted and talented learners.
- IAGC recommends ISBE require districts to submit a plan specifying how these designated funds will be expended for one or more of the following purposes:
 - Funding district employee tuition for coursework in an ISBE-approved gifted endorsement programs or graduate programs in gifted education.
 - Funding district educator participation in gifted education-focused conferences, webinars, workshops or online learning experiences facilitated by an ISBE approved provider with specific expertise in gifted education focusing on one or more of the following themes:
 - Selecting appropriate criteria for the identification/selection of students for advanced programming
 - Differentiating curriculum and instruction for advanced students
 - Reviewing research-based gifted education and talent development program models
 - Developing and monitoring implementation of individualized learning plans for gifted and advanced students that address both academic and psycho-social development
 - Creating assessment practices that demonstrate continuous student growth for gifted students
 - Providing differentiated guidance, counseling, or college and career development programming for gifted students

- Consistent with the purpose of Title II, IAGC recommends ISBE require that professional development activities address support for traditionally underserved populations, which may include:
 - Gifted economically disadvantaged students
 - Gifted students from culturally diverse backgrounds
 - Gifted English language learners and linguistically diverse students
 - “Twice exceptional” students (gifted students with disabilities)
 - Additionally, IAGC recommends ISBE encourage districts to address in their plans these additional populations frequently underserved in gifted programs but not specifically addressed in Title II gifted education language:
 - Gifted lesbian, gay, bisexual, transgendered, and questioning students
 - Gifted students in rural schools with limited capacity to provide specialized courses and programming
 - Profoundly gifted students
 - IAGC further recommends requiring school districts with above average “excellence gaps” in the percentages of students from disadvantaged and non-disadvantaged populations identified as gifted and participating in advanced academic programming to utilize at least 10% of Title I funds received to fund an approved plan to increase successful participation by economically disadvantaged minority students, underrepresented minority students, English language learners, and students with disabilities in advanced academic programs.
- ❖ Other Recommendations:
- To ensure Illinois has appropriate leadership for fully implementing gifted education requirements in the Every Student Succeeds Act, IAGC **strongly recommends ISBE create a full-time position dedicated to providing state leadership and district support, expanding the role and authority of the Gifted Advisory Board, and securing additional federal support by authorizing a gifted education organization or institution of higher education to pursue a federal Javits state capacity grant on ISBE’s behalf.**
 - IAGC recommends the legislature appropriate funds to update and expand the Gifted Education Seminar program supported by Marci Johnson at ISBE and develop companion training modules to ensure districts have a cost-effective research-based resource for providing professional development.

- IAGC recommends all pre-service teachers be required to complete a survey course on essential aspects of gifted education.

- IAGC recommends that any school receiving Title I or Title II funds for gifted services be required to implement such services according to all state approved rules regarding identification and programming for gifted students (see <http://www.isbe.net/rules/archive/pdfs/227ARK.pdf>) unless a district waiver of some elements of the rules is recommended by the Gifted Advisory Council.

Illinois Association for Gifted Children
 Feedback on Draft #1 of the Illinois State Board of Education Every Student Succeeds Act
 Implementation Plan

The Illinois Association for Gifted Children (IAGC) appreciates the opportunity to provide feedback on Draft #1 of the Illinois State Board of Education’s state plan for implementation of the Every Student Succeeds Act (ESSA).

The recommendations below are organized using the section numbers from the public draft of the state plan posted on the ISBE website. IAGC would be pleased to provide research documentation for its feedback and to respond to any questions about its recommendations.

For more information, please contact IAGC Governing Board member Eric Calvert, Ed.D., by email at eric.calvert@northwestern.edu or by phone at (847) 467-0185.

Section	ISBE Request	IAGC Position
1.2 A	ISBE requests ideas from individuals or groups regarding how funding streams can be combined in order to support each and every child as she or he progresses through school.	<p>ESSA requires that states include in their Title II implementation plans a description of how funds will be spent to support educators gaining competence in gifted education.</p> <p>ESSA also requires districts that receive Title II professional development funds to use those funds to address the learning needs of all students. ESSA specifically says that “all students” includes gifted and talented students.</p> <p>Therefore, IAGC recommends that ISBE set aside 5% of Title II funds to support the development and delivery of research-based professional development resources on supporting gifted and talented students with a particular emphasis on addressing the needs of bright students from low-income and culturally diverse backgrounds. By supporting resource development at the state level, district Title II funds may be used more efficiently to support local educators’ participation in training utilizing these resources.</p> <p>IAGC also encourages ISBE to pursue a competitive federal grant through the Jacob K. Javits program to provide additional resources to schools serving significant numbers of economically disadvantaged and/or minority students.</p>

2.1.A.v	<p>The local choice option is designed to allow a nationally recognized college entrance exam to substitute for the ISBE-identified accountability assessment. ISBE is currently using the SAT with essay for the purposes of the state accountability in ELA and math. ISBE requests feedback from stakeholders regarding this approach.</p>	<p>IAGC strongly supports allowing the SAT and/or ACT to be used as a substitute for ISBE-identified accountability assessments by school districts.</p> <p>Further, IAGC recommends ISBE provide opportunities for gifted and academically advanced students to take the SAT or ACT above-grade-level (beginning in middle school) as a nearly “ceiling-free” diagnostic tool for monitoring gifted students’ growth over time and guide appropriate instruction and supports. This approach has been used successfully for decades in academic talent search programs such as Northwestern University’s Midwest Academic Talent Search, in which thousands of Illinois students participate annually.</p>
3.1	<p>ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators (e.g., why a particular indicator makes/does not make sense within an accountability system).</p>	<p>IAGC recommends the creation of a composite rating representing access to and participation in advanced coursework and talent development programming for inclusion in the Illinois Report Card. (See attached document for specific recommendations regarding this rating, as well as the “Equal Talents, Unequal Opportunities” report from the Jack Kent Cooke Foundation at http://www.excellencegap.org/s/JKCF_ETUO_Report-vdi6.pdf.)</p> <p>In particular, IAGC recommends that this composite rating include the following elements:</p> <ul style="list-style-type: none"> ● The percentage of district students assessed for possible placement in a gifted education or advanced academic program in a given year; ● The percentage of district students receiving instruction directly from a teacher who holds a gifted education endorsement in a given year; ● The percentage of district students served by one or more of the following research-supported academic talent development opportunities in a given year: <ul style="list-style-type: none"> ○ Whole grade or single subject academic acceleration (e.g.

		<p>students who are learning full time in a setting with older peers and students who are taking one or more individual courses at a higher grade level than is age typical);</p> <ul style="list-style-type: none"> ○ Academically advanced courses including: <ul style="list-style-type: none"> ■ Advanced courses taught by a teacher with a gifted endorsement; ■ College Board-approved Advanced Placement and Pre-AP courses; ■ Middle school students enrolled in courses offered for high school credit; ■ Selective enrollment courses for advanced K-12 students provided by a college or university (when sponsored by a school or district); and, ■ Dual enrollment courses taught by community college, college, or university faculty for dual credit in high school and college. ● The “gap” between the percentage of economically disadvantaged students and percentage of non-economically disadvantaged students participating in one or more of the advanced learning options listed above; ● The percentage of all enrolled students scoring at the “exceeds expectations” (Level 5) level on the state achievement
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		<p>assessment;</p> <ul style="list-style-type: none"> ● The gap between the percentage of economically disadvantaged students and non-economically disadvantaged students scoring at the “exceeds expectations” level on the state achievement assessment; ● The percentage of students from economically disadvantaged backgrounds attaining the “college ready” benchmark scores on the ACT or SAT; ● The percentage of economically disadvantaged students who attain a score of 3 or higher on one or more AP Exams or who earn IB diplomas; and, ● The percentage of high school students identified as National Merit Semifinalists or attaining one or more other highly selective honors meriting special recognition to be determined by ISBE in consultation with the Gifted Advisory Board. <p>IAGC would also like to express its strong support for the following indicators already included in the draft ESSA implementation plan:</p> <ul style="list-style-type: none"> ● Equitable student access to (and participation in) AP, IB, and dual credit courses among student subgroups, including EL students, minority students, and economically disadvantaged students; ● Access to and participation in extracurricular activities (IAGC recommends giving additional weight to extracurriculars in academic and artistic domains); ● Postsecondary plans (IAGC recommends that the implementation of this indicator take into consideration addressing
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		<p>“undermatching,” or the degree to which students do not apply to more selective institutions of higher education for which they are qualified on the basis of academic achievements); and,</p> <ul style="list-style-type: none"> • Access to and participation in mentorship programs, especially those providing authentic exposure to possible future academic and career fields.
3.1	<p>ISBE requests ideas from individuals or groups regarding the two examples of weighting (e.g., comments on these examples, issues such as the example identified by the Accountability Workgroup, and other, different possibilities of indicators and weighting).</p>	<p>IAGC recommends that ISBE identify gifted or high ability students as a subgroup for disaggregation and define this group to ensure consistency in data reporting.</p> <p>In the interest of valid assessment of high achieving students and of educator impact with this population, IAGC recommends the inclusion/allowance of above-grade level assessment in future specification of allowable statewide tests.</p> <p>To help avoid the “bubble syndrome” with respect to weighting of academic achievement as measured by statewide assessments, IAGC recommends that points awarded do not disproportionately emphasize basic proficiency but rather incentivize helping students attain the highest levels of achievement. Additionally, IAGC recommends establishing multiple achievement levels in score reporting beyond the level representing grade-level proficiency.</p> <p>Finally, IAGC strongly recommends assigning a significant point value to the composite indicator described in the attached document.</p>
3.1	<p>What other data do we want included in our reporting system, but not in our accountability system?</p>	<p>IAGC recommends that reporting requirements include information about the assessments and criteria used for identifying gifted students and/or selecting students for advanced academic programming to help reveal effective and promising local practices.</p>

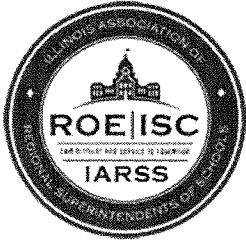
3.2	With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not?	IAGC recommends that growth be the priority so that students who are already performing at or above grade level expectations are not ignored in school improvement efforts.
3.2	Should there be minimal required amounts of growth (beyond the requirement to no longer meet the criteria for identification)? If so, what amount of growth would be sufficient? If not, why not?	ISBE intervention in low performing schools should not focus exclusively on raising achievement for students performing grade level, but should also include growth for students at or above grade level as well, and should shine attention on the availability of advanced academic programming. Efforts to address achievement gaps should not focus merely on “raising the floor” but also on “raising the ceiling” in low performing schools.
3.3	How should the state define “greatest need”?	IAGC recommends that the definition of "greatest need" include low levels of participation in advanced academic programming as well as large disparities between racial and economic student subgroups in participation in advanced academic programming.
3.3 (C)	What are the challenges of which ISBE should be aware in regard to the identification and implementation of “evidence~ based practices”?	IAGC recommends that ISBE prioritize support for research-based interventions for high-ability learners, including academic acceleration and grouping practices based on research-supported ongoing, culturally fair, and psychometrically valid assessment of student readiness.
4.2	ISBE requests additional comments on suggestions of uses of Title II funds.	<p>IAGC advocated for and applauded the inclusion of language in ESSA that requires state Title II implementation plans to include professional development to meet the needs of high achievement students.</p> <p>To build educator capacity to effectively serve gifted children and address new mandates in ESSA regarding gifted education, IAGC recommends that the state of Illinois designate at least 5% of Title II funds it receives to aid school districts serving significant numbers of low income students in accessing professional development</p>

		<p>on serving diverse gifted and talented learners.</p> <p>IAGC recommends ISBE require districts to submit a plan specifying how these designated funds will be expended for one or more of the following purposes:</p> <ul style="list-style-type: none"> ● Funding district employee tuition for coursework in an ISBE-approved gifted endorsement programs or graduate programs in gifted education; ● Funding district educator participation in gifted education-focused conferences, webinars, workshops or online learning experiences facilitated by provider approved by the ISBE Gifted Advisory Council with specific expertise in gifted education focusing on one or more of the following themes: <ul style="list-style-type: none"> ○ Selecting appropriate criteria for the identification/selection of students for advanced programming; ○ Differentiating curriculum and instruction <i>specifically</i> for advanced students; ○ Reviewing research-based gifted education and talent development program models; ○ Developing and monitoring implementation of individualized learning plans for gifted and advanced students that address both academic and psycho-social development; ○ Creating assessment practices that demonstrate continuous student growth for gifted students; and, ○ Providing differentiated guidance,
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		<p>counseling, or college and career development programming for gifted students.</p> <ul style="list-style-type: none"> ● Consistent with the purpose of Title II, IAGC recommends ISBE require that professional development activities address support for traditionally underserved populations, which may include: <ul style="list-style-type: none"> ○ Gifted and talented economically disadvantaged students; ○ Gifted and talented students from culturally diverse backgrounds; ○ Gifted English language learners and linguistically diverse students; and/or, ○ “Twice exceptional” students (gifted students with disabilities). ● Additionally, IAGC recommends ISBE encourage districts to address in their plans these additional populations who are frequently underserved in gifted programs but not specifically addressed in Title II gifted education language: <ul style="list-style-type: none"> ○ Gifted and talented lesbian, gay, bisexual, transgendered, and questioning students; ○ Gifted and talented students in rural schools with limited capacity to provide specialized courses and programming; and, ○ Profoundly gifted students. ● IAGC further recommends requiring school districts with above average “excellence gaps” in the percentages of students from disadvantaged and non-
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		<p>disadvantaged populations identified as gifted and participating in advanced academic programming to utilize at least 10% of Title I funds received to fund a plan approved by the ISBE Gifted Advisory Council to increase successful participation by economically disadvantaged minority students, underrepresented minority students, English language learners, and students with disabilities in advanced academic programs.</p>
4.2	<p>ISBE requests additional suggestions for ways it may improve the skills of teachers, principals, or other school leaders in identifying students with specific learning needs.</p>	<p>IAGC recommends that efforts include providing professional development on understanding the learning needs of gifted and high ability students as well as appropriate practices for assessment, curriculum modification, and academic acceleration. This professional development should be tailored to the specific roles of educators within their school districts.</p>
4.3	<p>The equity plan does not include a definition of “Ineffective teacher.” ISBE proposes the following, but requests the assistance of stakeholders in developing a definition.</p>	<p>IAGC recommends that ISBE consider the implications of using tests with low ceilings to evaluate the effectiveness of teachers predominately serving gifted and academically advanced students based on student growth, as this approach may underestimate the effectiveness of these teachers.</p>
5.1 (G)	<p>ISBE requests additional suggestions for ways it may consider the use of Title IV, Part A funds to</p> <ol style="list-style-type: none"> 1) Provide all students with access to a wellrounded education; 2) Improve school conditions for student learning; and 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students. 	<p>IAGC recommends ISBE explicitly allow and encourage districts to use Title IV funds to support access to advanced online coursework where similar local coursework is not available and to designate a portion of its Title IV, Part A funds for this purpose.</p>

5.2	ISBE requests additional suggestions for other factors it may wish to consider in regard to the waiving of the 40 percent poverty threshold.	IAGC recommends using the 40% threshold to allow districts increased flexibility and to allow more districts to incorporate school-wide talent development efforts into their Title I plans.
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ILLINOIS ASSOCIATION OF REGIONAL SUPERINTENDENTS OF SCHOOLS

October 7, 2016

JEFF VOSE
IARSS PRESIDENT

The Regional Offices of Education (ROEs) and Intermediate Service Centers (ISCs) are positioned to support ISBE in the development and implementation of the state's plan for the Every Student Succeeds Act (ESSA). Our long history of supporting administrators, teachers, parents, community partners and, most importantly, students. We offer up the following suggestions and observations in response to ISBE's initial draft of the statewide ESSA plan.

- ROEs/ISCs can support regular and meaningful improvement on educational standards and their effective implementation in schools by serving as a hub of continuous school improvement planning with targeted professional development and comprehensive wrap-around services that are coordinated.
- Foundational Services delivery model that currently exists in ROEs/ISCs provides the coaching model that is proven to be effective. Introduction of new/revised learning standards can be achieved effectively through this model
- ISBE should examine implementation of a Quality Review model in the vein of IBAM through ROEs/ISCs to ensure an accountability system that provides accountability to all stakeholders
- Provide ROEs/ISCs resources and funding to analyze data, do peer evaluation, provide common planning and collaboration among teachers in districts. Provide support for effective PLC use and implementation. Use data from statewide assessments to identify areas of concern and focus efforts to improve in those areas.
- SSOS template should be examined to identify the types of proven, evidence-based interventions that can be modeled across schools through a regional delivery model.

If you have any questions, please do not hesitate to contact me. My email is jvose@roe51.org and my phone number is 217-753-6623.

Sincerely,


Jeff Vose

Regional Superintendent- Sangamon/Menard #51
President- Illinois Association of Regional Superintendents of Schools



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Tony Smith, State Superintendent of Education
Illinois State Board of Education
100 West Randolph Street - Suite 4-800
Chicago, Illinois 60601-3223

October 7, 2016

Sent via email to essa@isbe.net

Dear Dr. Smith:

On behalf of the more than 130,000 members of the Illinois Education Association (IEA), I write to comment on the first draft of the Illinois State Board of Education's plan to implement the Every Student Succeeds Act (ESSA). The attached document contains a set of jointly held principles of the IFT, the Chicago Teachers Union and the IEA.

You will notice in our ESSA Guiding principles document that we urge the state to take into account all the factors that affect student learning and give each of them equal weight. Those factors have been highlighted in our comments. Each component must be carefully crafted with an understanding of how each fits with and affects the other components.

I am particularly proud of the work IEA is doing to transform Illinois public education by the promotion of trauma-informed practices in our classrooms, schools, districts and communities. This research-based work confirms what our educators have known for years: The outside life of our students and their families has a tremendous impact on the student's ability to learn.

IEA looks forward to reviewing the second draft of the state ESSA plan. We will actively participate and will provide more detailed comment on the state ESSA plan through ISBE workgroups, the Illinois Balanced Accountability Measures Committee, the state P-20 Council and future written comment. In the next version of this critical plan for Illinois schools, we urge ISBE to incorporate the attached guiding principles.

Sincerely,

A handwritten signature in black ink that reads 'Cinda Klickna'.

Cinda Klickna
President

Enclosure



Our



ESSA



A Union of Professionals
Guiding Principles Document

ESSA is a real opportunity for Illinois. The law is an opportunity to remedy more than fifteen years of the rank, sort, and punish mentality which was part of No Child Left Behind and Race to the Top. ESSA dramatically reduces the power of the U.S. Department of Education and gives states authority to design and implement new systems, including assessment, accountability and intervention. The law is an opportunity to address the long history of inequality in Illinois' schools, to acknowledge and support the needs of the state's rapidly changing student demographics, and to look at the inputs that make schools thrive. Illinois has a responsibility to focus on inputs: adequate and equitable funding, early childhood learning, broad and rich curricula, safe environments, wraparound services, timely and embedded professional learning for educators, and time to focus on learning rather than testing.

As Illinois moves to implement ESSA, our Unions will continue to be engaged in the process as advocates for students, educators and education support professionals. We will continue to collaborate and partner with state legislators, parents, school boards, superintendents, community partners and bargaining teams to make sure implementation goes smoothly and that educators maintain a strong voice in the process.

Our Guiding Principles on Evidence-based Initiatives that Work

School and district accountability must shift dramatically to address inequity and provide support and resources, so school and community members can collaboratively identify evidence-based initiatives that work for them locally, rather than face blame and punishment. All students have a right to learn and achieve academic success regardless of where, or under what circumstances, they live. Too often, children from disadvantaged areas, whether in urban centers or rural communities, lack the additional supports promoting learning which other children have at home and in their communities. ESSA opens the door to providing additional supports and resources to those students, based on evidence-based practices determined locally by practitioners, families, and community members who best know the community and school context. ESSA requires authentic practitioner, student, and family member voice in these local decisions.

All schools can be successful when the following factors are in place:

- Sufficient and equitable funding and resources provided to students in their classrooms, not to vendors and consultants,
- A broad, rich, and meaningful curriculum,
- Wraparound services delivered through the community schools model that clearly addresses the needs of students, and
- Appropriate time for school staff to analyze, plan, implement, and re-assess for change with a focus on fostering relationships within the school building and school community.

Our Guiding Principles for New Accountability

The state's ESSA plan for an accountability system should be based on fair, meaningful accountability and differentiated supports with a commitment to resource equity and sufficiency.

To that end, and on behalf of our members, we put forward the guiding principles below. We look forward to further conversations to craft an accountability system using measures, weights, goals and aggregation of measures which aligns with these principles.

Principle 1: The new accountability system must be based on multiple indicators tied to state and district resource accountability. It must reflect each school's efforts to address the factors that put students at risk, including the number of children in the school who live in poverty, are learning English, and come to the school with other special needs.

Principle 2: Academic and school quality indicators must not be weighted so as to disadvantage schools due to any socio-economic factor or disability that a child brings to the school.

Principle 3: Effective implementation of a new accountability system must include time for districts, schools and educators to adjust to different accountability expectations, as well as clear, strong, consistent communication with the public, educators, stakeholders, elected officials and parents on the uses and limitations of the new system.

Principle 4: The Illinois College and Career Ready Indicator Framework must account for a fuller picture of college and career readiness, so all children are treated fairly within the definition of what it means to leave our K-12 system ready to succeed in their chosen pathway. It must lift up all students, particularly those not planning on attending college upon graduation.

Principle 5: Schools must not be defined by a single score derived from the multiple measures included in the state's new accountability system. The work done in schools is simply too complex to be captured by a single score, letter grade or other designation.

Our Guiding Principles on Assessment

Assessments under No Child Left Behind and Race to the Top were used to rank, sort, and punish schools. These assessments reshaped curricula and drastically reduced time available for authentic, experiential learning opportunities not easily measured or differentiated. We believe assessments should be subject to the following principles:

Principle 1: Assessments must be rooted in classroom content and best practices. They must measure what students know and can do, rather than reflect the effects of poverty.

Principle 2: Assessments must not be used to rank, sort, and punish students and schools but instead be used as an opportunity to demonstrate learning and provide feedback. Assessments used for accountability must support authentic learning opportunities that inform instruction.

Principle 3: Assessments related to accountability must be limited in length and frequency by setting a limit on the aggregate amount of instructional time devoted to accountability assessments.

Principle 4: Assessments used for accountability must not require test-preparation activities.

Principle 5: As long as students are subjected to over-testing through developmentally and academically inappropriate standardized tests that are unaligned to curricula and as long as teachers do not have time for meaningful professional development, parents must have the right to opt their children out of state assessments.

Our Guiding Principles on Teacher Evaluation

Illinois' current system of teacher evaluation has created systemic pressures on local education agencies across the state. In general, the requirements are cumbersome, time-consuming, and do not support the supposition that the purpose of teacher evaluation is to support instructional practice. Neither teachers nor evaluators have received sufficient training. We believe teacher evaluation should be subject to the following principles:

Principle 1: Teacher evaluation processes must be fair and free from bias, regardless of teaching context.

Principle 2: Teacher evaluation must ensure teachers receive meaningful feedback that results in professional growth opportunities.

Principle 3: Value-added modeling (VAM) is neither valid nor reliable and must not be used for any part of a teacher evaluation system.

Principle 4: Teacher evaluation systems must not include unreliable student growth measures, but rather be based on measures teachers trust and use processes which minimize the time and stress associated with evaluation.

To: Illinois State Board of Education
CC: Melina Wright, ISBE; Claudia Quezada, ISBE
From: Pam Witmer, Illinois Network of Charter Schools
Re: ISBE's State Plan – Feedback on first draft
Date: October 7, 2016

As the charter school support organization that represents Illinois' 143 charter public schools, the Illinois Network of Charter Schools (INCS) strongly advocates for the Illinois State Board of Education (ISBE) to maintain the flexibility granted to charter schools under state law while developing its state plan. INCS also encourages ISBE to develop a robust and informative accountability system to benefit all of Illinois' students and public education stakeholders.

INCS has four main points of feedback from ISBE's first draft of its State Plan:

1. ISBE must maintain the current licensure and teacher evaluation flexibility guaranteed to charter schools under state law.
2. The state accountability model should include high school growth and limit the weight given to non-academic indicators. A suggested format is provided below.
3. ISBE should create a summative, single rating system for all schools and districts that emphasizes student performance, especially growth. INCS recommends an A-F rating system.
4. ISBE must ensure that accountability provisions for charter public schools are overseen in accordance with Illinois charter school law.

In addition to providing this feedback, INCS has responded to a few other components in the state plan.

Throughout the creation of the second draft of the state plan, INCS encourages ISBE to take into consideration the seven Commission-authorized charter schools that are their own Local Education Agencies (LEAs). (The Commission also has two charter schools that are "replicators" that recently transferred from Chicago Public Schools. These two schools operate under the same charter contract and are part of one LEA.) These schools' unique structures will have an impact on certain accountability portions of the state plan, depending on the final rule released by the Department of Education. INCS looks forward to reviewing the revised state plan under the final rule, and will provide additional feedback regarding this structure and other components of the plan.

INCS' Prioritized Feedback

1. Teacher Licensure and Evaluation

ISBE must maintain the current licensure flexibility and teacher evaluation flexibility for charter public schools and carry out the requirements of Section 4 in a way that is consistent with the Illinois Charter Schools Law. (Sections 4.1, 4.2, 4.3; pages 33-43)

- a. Charter public schools must retain their teacher licensure flexibility guaranteed to them under the Charter Schools Law. Nothing in the State Plan nor in the NPRM should require all charter school teachers to become licensed.** Section 4.1, page 33.

ISBE must carry out the requirements in Section 4, as they affect teachers in charter schools, in a manner consistent with the Illinois Charter Schools Law. The Illinois Charter Schools Law (105 ILCS 5/27A) grants charter public schools in the state flexibility in hiring and evaluating its teachers in instructional positions. The law and administrative code allow charters to hire individuals to fill instructional positions who are either licensed under the laws of Illinois or who meet the requirements under Section 27A-10(c). Under the law, up to 25% of a charter school's teaching force can be in instructional positions without an Illinois teaching license so long as they have a bachelor's degree, 5 years of experience, have passed a basic skills and subject matter knowledge test, and demonstrate continuing evidence of professional growth.¹ This flexibility allows charter public schools to hire alternate career path educators and continue to innovate in the field of education.

ISBE previously retained this flexibility under the previous versions of ESEA. Under No Child Left Behind, ISBE explicitly stated in its administrative code that teachers who work in charter schools who are either licensed or meet the requirements under Section 27A-10(c) of the School code satisfy NCLB's highly qualified requirement.²

- b. ISBE should modify the definition of "ineffective teacher" to reflect the flexibility granted to charters under current state law since it does not require charter schools to abide by state or district teacher evaluations systems.** Section 4.1, page 39.

ISBE should retain the current flexibility granted to charter schools since they are not required to follow the state or district-imposed evaluation system. ISBE should explicitly state that this does not apply to any of its charter public schools in the state by modifying the definition to state:

A teacher who has received an "unsatisfactory" rating in his/her most recent

¹ 105 ILCS 5/27A-10(c). (c) Charter schools shall employ in instructional positions, as defined in the charter, individuals who are certificated under Article 21 of this Code or who possess the following qualifications:

- (i) graduated with a bachelor's degree from an accredited institution of higher learning;
- (ii) been employed for a period of at least 5 years in an area requiring application of the individual's education;
- (iii) passed the tests of basic skills and subject matter knowledge required by Section 21-1a of the School Code; and
- (iv) demonstrate continuing evidence of professional growth which shall include, but not be limited to, successful teaching experience, attendance at professional meetings, membership in professional organizations, additional credits earned at institutions of higher learning, travel specifically for educational purposes, and reading of professional books and periodicals.

² See page 363 of Appendix D, 23 ILLINOIS ADMINISTRATIVE CODE 25, available here:

<http://www.isbe.net/rules/archive/pdfs/25ark.pdf>. A teacher who is employed in a charter school and who has primary responsibility for teaching content in any of the core academic subjects will be considered highly qualified if he or she either: a) holds a professional educator license applicable to the assignment and meets the other criteria applicable to the assignment, as outlined elsewhere in this Appendix D; or b) holds a bachelor's degree, has passed the relevant content-area test in each core subject area of teaching responsibility, and meets the other requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

performance evaluation rating or a teacher who has received a “needs improvement” on an evaluation and in a subsequent evaluation has received an “unsatisfactory” or “needs improvement.” A teacher who is employed in a charter school and who has primary responsibility for teaching content in any core academic subject will be considered effective if he or she either: a) holds a professional educator license applicable to the assignment and meets the other criteria applicable to the assignment; or b) holds a bachelor’s degree, has passed the relevant content-area test in each core subject area of teaching responsibility, and meets the other requirements of Section 27A-10(c) of the School Code [105 ILCS 5/27A-10(c)].

Under state law, charter school teachers are not required to follow the state evaluation system (PERA) or any district-created evaluation system, such as CPS’ REACH system.³ The current suggested definition of “ineffective teacher” in the state plan includes one who has “received an ‘unsatisfactory’ rating in his/her most recent performance evaluation rating or a teacher who has received a ‘needs improvement’ on an evaluation and in subsequent evaluation has received an ‘unsatisfactory’ or ‘needs improvement.’” Many charter schools’ evaluation systems do not have these designations, nor should they be required to restructure their evaluations to align with a state mandate, as that conflicts with current law.

Charter schools should be able to retain this flexibility so they can continue to innovate and develop best practices regarding teacher evaluation. In fact, this aligns with the purpose of charter schools as stated in the preamble of the Charter Schools Law: it was enacted to “encourage the use of teaching methods that may be different in some respects than others regularly used in the public school system” and to “create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site.” See 105 ILCS 5/27A-2(b)(3) and (b)(5). The General Assembly intended to “create a legitimate avenue for parents, teachers, and community members to take responsible risks and create new, innovative, and more flexible ways of educating children” and sought to create opportunities within the public school system “to develop innovative and accountable teaching techniques.” 105 ILCS 5/27A-2(c).

c. Charter school teachers should not be considered “out-of-field” if they satisfy the requirements under 105 ILCS 5/27A-10(c). Section 4.1, page 40.

Charter school teachers should *not* be classified as “out-of-field” if they are licensed or meet the alternative requirements outlined in the Charter Schools Law by holding a bachelor’s degree, passing the relevant content-area test in each core subject area of teaching responsibility, and meeting the other requirements of Section 27A-10(c) of the School Code.

The current state plan draft defines an out-of-field teacher as a “teacher teaching in a grade or content area for which he or she does not hold the appropriate state-issued license or endorsement.” While this may have been used as a statewide definition or guideline previously, ISBE should modify this to reflect the flexibility granted by law to charter school teachers. As mentioned in paragraph (1)(a) above, charter school teachers are granted flexibility in their licensure. To ensure that they retain this flexibility, ISBE should clarify that teachers who are either licensed or who meet the alternative to licensure requirements under the Charter Schools Law will not be classified as “out-of-field.”

d. The definition of “inexperienced teacher” should be a teacher with less than one year of teaching experience. Section 4.1, page 40.

ISBE should follow the guidelines set forth in the 2015 Illinois Equity Plan.⁴

³ 105 ILCS 5/24A-1, et al.

⁴ 2015 Illinois Equity Plan, Illinois State Board of Education, p. 12. Available at: <http://www2.ed.gov/programs/titleiparta/equitable/ilequityplan060115.pdf>.

2. Accountability Model

ISBE's accountability model should reflect a fair assessment of student performance, and therefore should include growth at both the elementary/middle and high school level. Section 3.1, page 18.

The suggested models below include growth for high schools and elementary/middle schools. The non-academic indicators should total 25% or less of the total accountability score. Non-academic indicators, such as 8th and 9th grade on track, attendance, post-secondary credential attainment, are more closely tied to income which could result in disproportionately lower scores for schools that serve low-income populations.

Growth: Similar to the elementary and middle school accountability model suggested in the state plan, the high school model should include a growth measure. Student growth is the currently the most effective way to measure the value schools add for their students. A model which factors achievement only is more susceptible to the socio-economic make-up of the student body than one which also factors growth. Thus, an achievement-only model is inherently unfair to districts and schools with large a low-income student body. Growth, on the other hand, provides a fairer depiction of student progress that can be measured across all school types, including low-wealth and high-wealth schools.

Non-academic indicators: The non-academic indicators are limited to 25% of both models as these metrics are more influenced by the socio-economic make-up of the school than the academic indicators selected. INCS is supportive of the non-academic indicators reflecting an even lower percentage of the model, such as 15%.

Post-secondary credential: Additionally, it is critical for a high school to not only graduate students, but graduate college ready students. Accordingly, a postsecondary credential and postsecondary access metric is included below to encourage schools to focus on preparing students to succeed beyond high school.

INCS' suggested models are as follows:

High School Model

- A. Achievement – 10 pts
- B. HS Growth – 35 pts
- C. High School Grad Rates – 20 pts
- D. EL Proficiency – 10 pts
- E. Student Success/School Quality
 - a. 9th Grade on Track – 10 pts
 - b. Attendance – 5 pts
 - c. Postsecondary Credential Attainment (AP/IB/Dual Credit/CTE) – 5 pts
 - d. Postsecondary Enrollment – 5 pts

Elementary and Middle School Model

1. Achievement – 15 pts
2. ES/MS Growth – 50 pts
3. EL Proficiency – 10 pts
4. Student Success/School Quality
 - a. 8th Grade on Track – 15 pts
 - b. Attendance – 10 pts

- a. **The accountability system should only contain an attendance metric, and not a chronic absenteeism in the non-academic indicator.**

Attendance and chronic absenteeism tend to be highly correlated, thus adding both to the accountability system as provided in the examples in the State Plan seems duplicative.

- b. More information should be provided about the College and Career Ready framework, how it will be implemented, how it will impact all schools, and which schools could currently meet the framework's goals.**

The College and Career Ready Indicator Framework, though thorough and rigorous, may not be feasible for schools to immediately achieve. Schools would need time to ramp up their offerings of postsecondary credentials as many do not currently offer the slate of options suggested by ISBE. This framework will also disproportionately impact numerous schools as many of them do not currently meet the academic benchmarks. Only 18% of charter school students in Chicago Public Schools, for example, earned a postsecondary credential. Postsecondary credentials include dual credit, IB exams, AP exams, dual enrollment, and CTE credits.

Since this framework is essentially an indicator of district wealth, it should only be used in the reporting portion of the accountability section. ISBE should not use the framework in any accountability metric, as it will negatively impact low-wealth schools and districts.

- c. Some accountability indicators should be reported publicly only and not included as part of a school or district's overall rating.**

Some potential indicators, like the entire suite of indicators in the College and Career Ready Framework and school discipline (expulsions or suspensions) may still be collected, but ISBE should not include them in an overall rating. Since it is unclear which indicators ISBE will use, INCS will reserve comment on this for its feedback for the next draft of ISBE's state plan.

- d. In an effort to equitably measure all school types in the state, ISBE should develop a second rating system for its alternative and drop-out recovery schools, including alternative charter public schools.**

There are two alternative charter public schools in Chicago, and dozens of other alternative public schools across the state. ISBE should develop an additional rating system to adequately and accurately measure performance of these schools to encourage operators to open and continue to operate schools that serve alternative student populations. States like Idaho are developing an alternative school accountability model in their state plans,⁵ and the National Association of Charter School Authorizers (NACSA) has written an extensive report on best practices in rating alternative charter schools.⁶ INCS is willing to partner with ISBE and other stakeholders to help develop such a model.

⁵ Idaho is contemplating including proficiency, English Learner test growth, 4-year cohort graduation rate, and extended graduation rate in the academic portion of the alternative school accountability model. The school quality indicators would include credit recovery/accumulation, chronic absenteeism, a teacher quality and engagement index and a student engagement index. See: <http://www.sde.idaho.gov/topics/essa/index.html>.

⁶ National Association of Charter School Authorizers, "Anecdotes Aren't Enough: An Evidence-Based Approach to Accountability for Alternative Charter Schools." 2013. Available at: <http://www.qualitycharters.org/wp-content/uploads/2016/01/AnecdotesArentEnoughNACSAReport.pdf>.

3. ISBE should create a summative, single rating system for all schools and districts that emphasizes student performance, especially growth.

(Section 3.1, page 20.)

ISBE must employ a summative rating system that accurately reflects student performance and heavily emphasizes student growth in order to allow parents, stakeholders, and education leaders to have a clear understanding of school and district performance. As discussed in section (2) above, student growth is the most effective way to measure the value schools add for their students and provides a fairer depiction of student progress that can be measured across all school types, including low-wealth and high-wealth schools.

To easily share school and district performance, ISBE should employ an A-F summative rating system that consists of 5 levels: A, B, C, D, and F. This type of objective, intuitive rating system can easily be conveyed to parents via school and district communications. Most, if not all, parents will understand that an “A” rating is excellent, whereas an F rating is an indicator of a school that is failing to meet the state’s expectations of a quality school. Such a rating system will be easier to convey to audiences than a number, color, or other categorical system.

ISBE has received pushback on A-F models and summative rating systems in general, but the state should not “hide the ball” from parents and stakeholders. Parents have a right to understand the quality of their school so they can make the appropriate decision regarding where they send their child to school, where they want to live or purchase a home, and whether they should be advocating for improvements at their child’s school. If the state does not rate schools in a transparent and understandable fashion, parents and stakeholders will turn to another less qualified organization or company for guidance or rankings. ISBE is the most qualified entity to provide a transparent, objective, and parent- and stakeholder-friendly summative rating system.

4. All accountability provisions should ensure that charter school authorizers retain the ability to revoke or decline to renew low-performing charter public schools before intervention occurs or other timelines for intervention begin.

(Section 3.3, page 31.)

Any accountability provisions developed by ISBE must align with the Illinois Charter Schools Law. In the case of charter schools, an authorizer’s decision to revoke or decline renewal of a charter based on academic performance will override the intervention by the state. In other words, low-performing charter schools can be shut down, rather than be subject to intervention. Further, timelines associated with interventions for comprehensive and targeted support and interventions should not delay the authorizer’s ability to close the charter school through its own charter review or revocation processes.

A charter school meeting the accountability requirements set forth in its charter will not be exempt from accountability requirements set forth by ISBE. Nor will meeting ISBE’s requirements exempt a school from the performance targets in its charter. For example, a school that meets the terms of its charter but, under the state’s accountability system, has subgroups whose performance is at a low enough level to cause the school to be identified for targeted support and improvement would be so identified and would develop and implement a plan to improve those subgroups’ performance, even if the school meets the terms of its charter. Similarly, if a charter school meets ISBE’s accountability requirements but fails to meet the performance targets in its charter, the authorizer could still close the school.

INCS' Additional Feedback

1. Student academic assessments and local choice option. (Section 2.2, page 10.)

Districts should only be able to opt out of the SAT only if (1) they are going to be taking the ACT, (2) taking the ACT does adversely affect the school or district's accountability rating; and (3) if the state can still accurately measure districtwide and statewide performance using the ACT instead of the SAT.

In addition, a school district that authorizes charter schools should only be able to access this alternative choice if it obtains meaningful input and consultation from the charter public schools in the district. Such districts must provide assurances that they have meaningfully consulted with their charter public schools in their request for flexibility for a local choice option.

2. Exiting schools from comprehensive support and improvement: increased achievement and growth are necessary. (Section 3.2, page 22.)

The proposed regulations require that a state's exit criteria expect that at a minimum, schools a) increase student outcomes, and b) no longer meet the eligibility criteria for comprehensive support and improvement.

If the end goal is to have all students in Illinois be at a certain level of academic preparedness, then improvement in achievement is a necessity and thus should be a requirement to exit comprehensive support. There should be a minimum required amount of growth; it should at the very least be that of the state average. Growth must be demonstrated for all students and for those subgroups deemed as underperforming. Schools with low proportion of a certain underperforming subgroups may choose not to prioritize them if the state is only measuring growth for all students.

3. Skills to Address Specific Learning Needs. (Section 4.2, page 38.)

It's unclear whether charter school data will be included in the Ed360 dashboard. Charter schools are not required to submit certain data sets to the state, including teacher evaluation ratings and other teacher data. More information is needed to determine whether charter schools would be eligible or required to participate in this dashboard. INCS will reserve additional comments for the second version of the state plan, but welcomes any questions or feedback from ISBE in the meantime.



October 5, 2016

To Whom It May Concern;

I would like to provide feedback to the ESSA Draft as an elementary school principal and a Legislative Committee member of the Illinois Principal Association. Please place strong consideration on the following factors in determining revisions for the next ESSA draft:

I urge you to use the Balanced Accountability Model found in the Vision 20/20 initiative and signed into law as PA 99-193. In regards to accountability, ESSA says that 51% of student growth has to be on academic indicators (test scores). ***It is important that ISBE requirements should not place more than 51% on indicators of academic performance.***

ISBE should support the indicators of College and Career readiness. More schools are moving away from traditional grading methods, something in which ISBE supports: <http://www.isbestandardsbasedreporting.com/>. Another system needs to exist to determine GPA as some schools use number systems instead of grades (1-4), which mirrors the system that we were mandated to put into place for teachers via the regulations by ISBE on the evaluation system. ***Therefore, I do not support the arbitrary starting point of 2.8 for GPA to indicate College and Career Readiness.***

Furthermore, as an elementary building principal, I think ISBE is on the right track with the behavioral and experiential benchmarks which include 90% attendance and 25 hours of community service. In addition, attendance should be broad because attendance in this sense is different than the attendance we take for our GSA calculation, because these learning experiences won't always take place in the traditional school setting.

When creating long and short term goals, I would like to see ISBE plan their long term goals at least 5 years out since research indicates it takes 3-5 years for systemic change to take hold. Sustainability of programs is the key to seeing positive change.

The latest research from businesses reveal that the economy needs students with strong self-skills, soft skills, social intellect, and emotional intellect. ***It is critical so see these soft skills be placed in the accountability model.*** In regards to the Title IV New Block Grant, I would like to see ISBE honor the intent of ESSA and funnel Title IV dollars so Districts can locally support and enrich students.

To conclude, the educational leaders in this state just spent the last two years together advancing Vision 20/20. ***Spend some time here, <http://illinoisvision2020.org/>, and you will have the answers to many of questions.*** Thank you for taking the time and consideration into these matters.

Sincerely,

Ben Lee
IPA Corn Belt Region
Legislative Committee

Illinois State Board of Education



October 4, 2016

To Whom it May Concern;

After looking over the ISBE ESSA First Draft, I would like to share some of my thoughts and feedback as an elementary school principal and the IPA State Director for the Corn Belt Region.

- In regards to accountability, ESSA says that 51% of student growth has to be on academic indicators (test scores). It is important that ISBE requirements should not place more than 51% on academic indicators (test scores). PA 99-193 from the Vision 20/20 plan that was signed into law by our governor has already accounted for this through the Balanced Accountability Model.
- In regards to College and Career readiness, I would like to see ISBE support the indicators of College and Career readiness. The CCR framework established student readiness based on the following academic and testing benchmarks.
 - GPA 2.8 out of 4.0
 - Readiness college entrance score on the SATIn my current school district, we have moved to a skills based reporting system K-8 and are moving that way for the high school. On a Skills Based Reporting system, I would like to see them honor a 2.5 or offer another scale for grading scales which are more rigorous. I would also like to see the possibility of accepting another readiness score (for example, ACT, in case the student doesn't test well on the SAT).
Being in an elementary building I feel that it is important to include behavioral and experiential benchmarks:
 - 90% Attendance
 - 25 hours of Community Service (or military service)
 - Workplace Learning Experience
 - Two or more organized Co-Curricular Activities (including language and fine arts)
- In regards to long term and short term goals, I would like to see ISBE plan their long term goals at least 5 years out since research indicates it takes 3-5 years for systemic change to take hold. Sustainability of programs is the key to seeing positive change.
- In regards to future economic skills, the latest research from businesses reveal that the economy needs students with strong self-skills, soft skills, social intellect, and emotional intellect. It is critical so see that this be placed in the accountability model.
- In regards to the Title IV New Block Grant, I would like to see ISBE honor the intent of ESSA and funnel Title IV dollars to school districts so Districts can locally support and enrich students

Thank you for taking the time and consideration into these matters.

Sincerely,
Stacey Rogers
IPA Corn Belt State Director



illinois school library media association

P.O. Box 1326
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Phone: 309-341-1099
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AUG 17 2016 #1

State Superintendent's
Office

August 15, 2016

Illinois State Board of Education
James T. Meeks, Chairman
Tony Smith, Ph.D., Superintendent
100 N. 1st Street
Springfield, IL 62777

Re: Key Findings for ESSA

Dear Chairman Meeks and Superintendent Smith:

On behalf of the Illinois School Library Media Association (ISLMA), thank you for the opportunity to comment on ISBE *Every Student Succeeds Act* (ESSA) Listening Tour Report. The newly formed ISLMA ESSA Task Force Committee is writing this letter to alert the Illinois State Board of Education that the ESSA Key Findings document of June 16, 2016, failed to include the importance of effective school library programs to student success in Illinois. In advance of ISBE's Statewide Listening Tour Two, we want to share our observations and recommendations.

School libraries are unique spaces within every learning community that provide equitable access to resources for all students. School libraries in Illinois provide essential access to print and digital resources. Instruction provided by certified school librarians throughout Illinois results in students who read, analyze and are able to navigate information for lifelong learning. From digital literacy and citizenship, to instilling a love and comprehension of literature and nonfiction text; school libraries reach all students and staff in a school community. Therefore, adding provisions to ensure the success of Illinois school library programs is crucial.

Effective school libraries have proven to boost student achievement. The 2003 Illinois study, "Powerful Libraries Make Powerful Learners," states that school libraries that have larger, more current collections show a 11-13% increase in student test scores. All students in Illinois should have access to current, high-quality print and digital resources appropriate to their reading level. Provisions to Title I of ESSA should include effective school library programs to ensure access to these essential resources, especially in schools of high-need. School libraries provide personalized learning support that leads to increased student engagement and achievement.

School librarians are licensed educators leading in print and digital literacy instruction, the latest technology instructional practices, and each buildings' curriculum. School librarians use Student Learning Objectives to show student growth and partner with teachers to provide targeted instruction.

Moreover, school libraries, led with the expertise of a school library professional, increase access to personalized, rigorous, technology-based learning experiences. Not only do school librarians provide this environment and instruction during the day, but could also provide specialized library programs after school hours. Expanding library access in any capacity has shown to impact student academic achievement as shown in the Illinois Study. School libraries would benefit from funding for this type of student enrichment through Title IV through Part A. The 21st century school library reaches students in a 24/7 atmosphere through technology and innovative programming.

Schools that have fully staffed, effective library programs critically support student achievement in Illinois. The Illinois School Library Media Association strongly urges that ISBE use ESSA Implementation to strengthen school libraries across Illinois. Please consider adding these school library and school librarian-focused policy recommendations to the final Illinois ESSA Implementation Plan:

1. Endorse adequately staffed libraries, including a state-certified school librarian who is an instructional leader and teacher;
 - a. Supports the development of digital learning, participatory learning, inquiry learning, technology literacies, and information literacy;
 - b. Supports, supplements, and elevates the literacy experience through guidance and motivational reading initiatives;
 - c. Has up-to-date digital and print materials and technology, including curation of openly licensed educational resources; and
 - d. Provides regular professional development and collaboration between classroom teachers and school librarians.

2. Maximize use of federal funding through grant programs like Innovative Approaches to Literacy (IAL), LEARN Act funding, and the Block Grant to create, enhance, and maintain effective school library programs, and provide robust professional development opportunities to school librarians across our state.

Thank you for the opportunity to make our recommendations concerning this important legislation. You can contact the Illinois School Library Media Association at:

PO Box 1326
Galesburg, IL 61402-1326
Telephone: 309-341-1099 Fax: 309-341-2070
Email: exsec@islma.org

Sincerely,



Patti Fleiser, ISLMA President, and
The ISLMA ESSA Task Force

CC: Illinois Library Association; Reaching Across Illinois Libraries System (RAILS), Heartland Library System, Illinois State Library



illinois school library media association

P.O. Box 1326
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execsecretary@isлма.org

October 6, 2016

Dear Superintendent Smith, Chairman Meeks and Members of the Illinois State Board of Education,

The Illinois School Library Media Association (ISLMA) is writing on behalf of our 785 members, representing school librarians all across Illinois and from every type of K-12 institution. We are pleased to offer the following recommendations to ISBE concerning the ESSA Draft Plan #1 (dated 25 August 2016), and in response to questions distributed at Stakeholder Listening Tour sites between September 6 and October 5, 2016. Thank you for soliciting stakeholder feedback to both specific questions and inviting comment on the draft policy points generally.

ISLMA publishes “Linking for Learning”, recognized by the Illinois State Library and the General Assembly as the definitive standards for school library media centers across the state. Throughout ISBE’s stakeholder engagement process, ISLMA members have reviewed the stated goals and proposed strategies for ESSA Implementation in our state and have returned comments on key action areas and the funding formula. Like all educators in Illinois, school librarians are concerned with the development of the Whole Child. As ISBE considers policies and funding formulas across the wide spectrum of ESSA Implementation, we’d like to highlight that:

- School Libraries promote and encourage well-rounded, collaborative, lifelong learners.
- The Library is the largest classroom in the school allowing children to explore interests, problem solve, and build information literacy skills.
- Licensed School Librarians provide a wide variety of programs for students to participate.
- Licensed School Librarians are trained to select high-quality materials and literature that support student interests as well as Common Core.
- Librarians are equipped to help students navigate digital media and become socially responsible users of information in our fast-paced world.
- Licensed school librarians help foster an appreciation of literature and a love of reading in our students.

Section 3 - ACCOUNTABILITY, SUPPORT, AND IMPROVEMENT FOR SCHOOLS

As ISBE considers ways to implement an accountability system that acknowledges meaningful differences between schools and addresses the success of all students as well as sub-groups of students, we encourage you to adopt accountability policies and processes that utilize effective school library programs and school librarians as drivers for success. An effective

school library program provides instruction designed to maximize student growth and progress, student academic achievement, and student progress in English language proficiency. Effective school library programs help close student performance gaps and increase post-secondary readiness. ISBE’s goals of increasing graduation rates by providing comprehensive and rigorous instructional support across all grade levels and content areas should acknowledge and integrate school libraries and licensed librarians for their significant and sustained work supporting in student achievement.

3.1 School Accountability Measures

“Academic Indicators and School Climate”

An effective school library program provides instruction designed to maximize student growth and progress, student academic achievement, and student progress in English language proficiency. Effective school library programs help close student performance gaps and increase post-secondary readiness. ISBE’s goals of increasing graduation rates by providing comprehensive and rigorous instructional support across all grade levels and content areas should acknowledge and integrate school libraries and librarians for their significant and sustained work in supporting student achievement.

Likewise, effective school library programs materially contribute to a welcoming, productive, supportive school climate; the school library is never just an empty room. Effective school library programs are under-recognized ways to address “school climate”. They provide a safe haven for students with different learning styles and modalities. The school, with a library at its core, will help ISBE achieve its accountability goals. The school library program is an integral piece of the entire student experience: student behavior, social/emotional learning, school culture, and academic success.

At its most basic, ISLMA believes and understands that an effective school library program is more than just the room, and that a school climate that encourages the development of the whole child needs to have the right number of school librarians on staff and engaged as holistically across the curriculum and able to focus on all students and student groups. We believe that particular focus should be paid in the accountability system on an appropriate student to librarian ratio to fulfill this outcome. Furthermore, we believe in the equity of access and opportunity for each and every child in Illinois to be served by a licensed Library Information Specialist.

3.2 A Comprehensive Support and School Improvement

“Uniform statewide exit criteria”

An additional exit criteria for the statewide multi-tiered system of support (MTSS) that Illinois should look at is an evaluation of the Library Media program in ISLMA’s “Linking for Learning” guidelines. First passed by the General Assembly in 1993 and updated every 5 years, these guidelines include the current and robust standards by which all Illinois school libraries can and should measure themselves. Colorado State Library and RSL Research Group fellow Keith Curry Lance has studied in numerous states, including Illinois, Colorado, and South Carolina and found that effective library media programs make powerful learners. ISLMA is in the process of conducting our next scheduled comprehensive review and update of “Linking for

Learning” to be published in 2017. We encourage ISBE to integrate these standards for school libraries into the MTSS approach.

3.3 A Allocation of School Improvement Resources

“Statewide Support Liaison”

ISLMA recommends that ISBE, as a component of its MTSS approach, dedicate a “statewide support liaison” who is specifically focused on identifying and applying for grant programs that improve, enhance, or extend effective school library programs, and likewise focus on identifying and applying for grant opportunities that empower school librarians with professional development and continuing education to better serve students, other faculty and staff, and school leadership.

“School Review Team”

ISLMA’s commitment to the integrity and outcomes of the school improvement process extends to our willingness to act as qualified and recognized library experts on school review teams. ISLMA thanks ISBE for considering an approach that integrates peer-to-peer support and looks forward to participating in this “Networked set of educators from peer schools and districts” for future success.

“Develop the state funding formula ... for comprehensive or targeted supports”

ISLMA recommends that ISBE utilize and implement the student support services provided by effective school library programs across all schools and districts, but with particular attention to underperforming schools. ISLMA knows from our evidence-based program guidelines and standards-based rubrics in “Linking for Learning” that school libraries help students become effective and efficient lifelong users and creators of ideas and information.

ISLMA recommends that the state formula for allotment of funds to schools identified for comprehensive support and correction include effective school libraries, and that ISBE specifically seek to access and utilize federal funds to support student achievement through provision in IAL (Innovative Approaches to Literacy) and LEARN that improve staffing, programs, collections, and instructional support services in those schools.

3.3 D Periodic Resource Allocation Review

As a component of ISBE’s multi-tiered system of support, ISLMA recommends that in the ‘planning year’, one of the audit criteria be based on our “Linking for Learning” guidelines to evaluate the effectiveness of school library programs.

ISBE’s “periodic resource allocation review” should include a specific review of grant funding sources that support and encourage effective school library programs and the instructional support services provided by school librarians.

ISBE should be aware now and in the future that school library programs are uniquely eligible for grant funding through multiple channels to address various gaps in literacy, technology, college and career readiness, and teacher quality.

Additional Comments on Section 3

As ISBE considers strategies for school improvement, the school librarian community wants to highlight a 2013 report from the National Center for Literacy Education (NCLE) which shows that when school librarians are highly involved leaders, they play a critical role in their schools through consistent and sustained collaboration with other educators. Significant new Title funding is becoming available through ESSA that would, if applied for and put to work by ISBE and LEAs, allow licensed librarians to focus on school improvement not only through direct student contact but also through professional development for all faculty members on information literacy and resources, instructional technology, and more. Collaboration among faculty and high quality professional development both play vital roles in the school improvement process. We recommend that ISBE adopt school improvement policies that recognize and support school librarians in our roles as teachers, co-teachers, and providers of instructional support for content area teachers.

Section 4 - SUPPORTING EXCELLENT EDUCATORS

In Section 4 of the Draft Plan, ISBE asked stakeholder for “Additional suggestions for ways Title II funds may be used in order to improve the skills of teachers, principals, or other school leaders in identifying students with specific learning needs.”

School librarians across the state ask that ISBE looks at new and extended sources of federal money - in addition to state and local funds - to help our school librarians realize the goal of supporting and improving educator effectiveness. In particular, we encourage ISBE to bundle up and apply for federal programs like Innovative Approaches to Literacy for high needs schools. New Title II monies are available for library programs, and our ESSA Plan should specifically encourage investments in academic and technology programs and services through effective school library programs.

The daily work of school librarians places them at the forefront of providing professional development to their educator colleagues. School librarians are professional development leaders within their buildings and communities. School librarians not only teach and develop students on a daily basis, but they also lead educators, administrators, and parents to new educational technology, new digital tools, and new digital resources. As a part of their role as professional development leaders, school librarians provide focused training and support of new school initiatives that incorporate new educational technology and digital resources. Being highly effective in the role of professional development leaders within schools requires funding for certified school librarians to continue with their own professional development endeavors.

ISBE is now authorized by ESSA to use funds to support the instructional services provided by “effective school library programs” (Title II, Part A). LEAs are authorized to use funds to support the instructional services provided by “effective school library programs” (Title II, Part A). ESSA requires local LEARN grants to provide high-quality professional development opportunities for specialized instructional support personnel, school librarians, paraprofessionals, and other program staff (Title II, Part B, Subpart 2). ESSA also authorizes all local grants for K-5 or 6-12 to provide time for literacy staff such as school librarians or specialized instructional support personnel to meet to plan comprehensive literacy instruction (Title II, Part B, Subpart 2).

ESSA now includes a new authorization of the Innovative Approaches to Literacy (IAL) program that provides dedicated funding to promote literacy programs in low-income communities. ESSA authorizes funds to be used for developing and enhancing effective school library programs, which may include providing professional development for school librarians, books, and up-to-date materials to high need schools. IAL is a Title II program and is focused on High Needs schools. Fundable projects may include providing professional development for school librarians, books, and up-to-date materials to high need schools.

ISLMA recommends that ISBE fully utilize federal grant sources like Innovative Approaches to Literacy and within LEARN Act grants. ISLMA encourages ISBE to fund literacy, ELL, digital literacy, and technology programs through the school library and with a school librarian as an effective way to directly address the achievement gap. New Title monies are also available for school librarians for Continuing Education and Professional Development. Please know that the school librarian community is an interested, invested, and eager partner in this project for years to come.

Section 5 - SUPPORTING ALL STUDENTS

In Section 5 of the draft ESSA Implementation Plan, ISBE asked stakeholders to provide “Additional suggestions for ways ISBE can use Title IV, Part A funds.”

ISLMA recommends that ISBE fully access and utilize Title IV, Part A funding available to effective school library programs through the Student Support and Academic Enrichment Grants Program (SSAEG), the new flexible block grant program established in ESSA designed to allocate funding to nearly all school districts. SSAEG now allows ISBE to invest in academic and technology programs and services through effective school library programs. As a non-competitive grant program, SSAEG funding could kick-start library programs in otherwise at-risk schools.

Through ESSA, states are authorized to use funds to assist LEAs with identifying and addressing technology readiness needs, including Internet connectivity and access to school libraries. (Title IV, Part A) States are also authorized to use funds to assist LEAs in providing school librarians and media personnel with the knowledge and skills to use technology effectively, including effective integration of technology, to improve instruction and student achievement. (Title IV, Part A)

Licensed school librarians are in the ideal position to:

- 1) Provide all students with access to a well-rounded education;
- 2) Improve school conditions for student learning; and
- 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

As the Association of College and Research Libraries transitions to the Framework for Information Literacy for Higher Education, it is the K-12 school library programs, directed by trained licensed librarians, that will prepare students to meet the information literacy standards

as college freshmen. The importance of digital and information literacy in preparation for post secondary is further illustrated by the multiple Common Core's College and Career Anchor standards that integrate digital and information literacy components. The licensed school librarian's collaborations across the curriculum bridge multiple literacies and impact multiple standards, including the Next Generation Science Standards and the International Society for Technology in Education.

With regard to the Illinois College and Career Ready Indicator Framework, the curricular requirements for successful Advanced Placement and Dual Credit courses require curricular partnerships with the school librarian whose specialized training in collating authoritative and pertinent resources is unmatched by any other professional in the school.

It should be noted that Innovative Approaches to Literacy (IAL) funding is currently underutilized by schools and districts across Illinois. LEARN Act and Block Grant (SSAEG) monies contain new federal program funds that libraries and librarians could access under ESSA. This further underscores the need for a library-specific statewide liaison for grant making as a component of MTSS.

ISLMA appreciates the opportunity to make these recommendations regarding the ESSA Draft Plan #1 (dated 25 August 2016), and in response to questions distributed at Stakeholder Listening Tour sites between September 6 and October 5, 2016. We encourage ISBE to include the Illinois School Library Media Associations "Linking for Learning" standards in our state ESSA Plan. "Linking for Learning" was first passed by the General Assembly in 1993 and is updated every 5 years. These guidelines include the current and robust standards by which all Illinois school libraries can and should measure themselves. ISLMA is in the process of conducting our next scheduled comprehensive review and update of "Linking for Learning" to be published in 2017. We encourage ISBE to integrate these standards for school libraries into the MTSS approach.

Our community of school librarians is invested in the future of education across our state. We share common goals with other educators, parents, and stakeholders wanting to address the academic and socio-emotional life of the child. We look forward to advancing those goals together.

If you have any further questions or would like any follow up, please don't hesitate to contact me at president@islma.org or 847-363-3642.

Sincerely,

Patti Fleser
President, Illinois School Library Media Association.



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

Illinois State Alliance of YMCAs
Comments regarding ESSA implementation
September 27, 2016

The Illinois State Alliance of YMCAs brings together YMCAs working at more than 800 sites in 120 communities and serving 1.1 million Illinoisans through youth development, healthy living and social responsibility. The Ys in Illinois open their doors to tens of thousands of school aged children throughout the year at hundreds of out of school time programs and summer day camps. These programs focus on social and emotional skills, achievement gap, homework support, summer learning loss, healthy eating, physical activity and much more.

We would like to begin by thanking ISBE for the opportunity to provide comments on the draft ESSA implementation plan and for the inclusion of afterschool programming in its plan. We see many ways that the role of afterschool providers including Ys could be expanded in this plan to help Illinois' youth and schools.

Plan Feedback

- Outreach and Input [Section 1.1 (A)(i)]¹: We encourage ISBE to accept feedback from the diverse afterschool community because they are important partners for school day learning. Many states have created entire committees filled with stakeholders that are collaborating on writing the plan, including members of the afterschool community. We encourage the state to work as closely as possible with afterschool providers in constructing its plan.
- Improving Academic Outcomes: Afterschool programming has been proven through research to improve youth outcomes and should be used as a strategy for improving schools and academic achievement.
 - *Accountability System Indicators* [Section 3.1]: Afterschool programs address many of the school improvement indicators listed as non-academic indicators. We recommend it be added as a separate indicator as well.
 - *Well- Rounded and Supportive Education for Students* [Section 5.1(B)]: Afterschool programs should also be used as a strategy to create a well-rounded and supportive education for students because of its proven ability to improve educational outcomes and expand the subject to which youth are exposed.
- Data: ISBE can use ESSA implementation as an opportunity to collect data on a range of youth outcomes.
 - *Reporting System* [Section 3.1]: In regards to the data the state should include in the reporting system, we suggest that ISBE collect data that reflects the impact afterschool programs can have on schools and communities, such as improved safety, improved health outcomes, and improved social/emotional skills. ISBE could collect this data through 21st Century Community Learning Centers' (21st Century CCLCs) reporting systems or through partnerships with other afterschool programs.
 - *Ed360* [Section 3.1; Section 4.2(B)]: Incorporating data such as this into the educator's dashboard/Ed360 and sharing that information with community partners that run afterschool programs could help to track outcomes and improve instruction.

¹ Each recommendation is accompanied by the section of the ISBE plan it refers to in case you get any questions about which section you are talking.

- **Family Engagement:** Afterschool programs provide a crucial bridge between communities and schools and can help foster the family engagement called for under ESSA.
 - *Transitions* [Section 5.1(A)]: Out-of-school time programs can assist in students' transitions throughout their schooling because these programs often have strong consistent parent and community ties. As youth may continue on in their schooling, they or their siblings may stay with the same afterschool programs.
 - *Family Engagement Funding* [Section 5.1(E)]: We further applaud ISBE's decision to include the use of Title IV, Part B funds to build the capacity of sub grantees as they implement high-quality afterschool and family programs. We also want to note that ESSA's provisions on Parent and Family Engagement in Title I Part B call on education agencies to collaborate with community-based organizations, such as afterschool programs, to carry out parent engagement plans and in using its parent engagement funds. We encourage ISBE partner with afterschool programs in using these funds.
 - *Migratory and Low-Income, Rural Youth* [Section 5.2]: ISBE's plan to address the needs of migratory youth and low-income, rural students can also be assisted by afterschool programs. Afterschool programs can help connect families and youth to the vital services that they need in order to be successful in school. The extra instructional and enrichment time offered in afterschool can help these student populations to succeed.
- **Funding:** Because afterschool is such an integral part of educational improvement, we encourage ISBE to use the opportunities present in ESSA to make investments in afterschool to support this crucial service.
 - *Allocation of School Improvement Resources* [Section 3.3 (A)]: In allocating funds set aside for school improvement, we remind ISBE of the positive effects of afterschool programs and encourage ISBE to allow funds to be allocated to afterschool when planning for school improvement.
 - *Title IV Part A Funding* [Section 5.1(G)(iv)]: In regards to ISBE's request for additional ways it can consider the use of Title IV, Part A funds, we suggest ISBE consider opportunities for STEM learning and college and career readiness in afterschool.
 - **STEM:** ESSA places an emphasis on STEM learning, an area in which afterschool programs provide limitless opportunities for students to advance. To allow for the level of exposure and experiences needed to develop a deep understanding of STEM subjects, we must ensure that all communities offer multiple and varied ways for students to engage with these subjects, including afterschool programming.²
 - **College and Career Readiness:** Afterschool programs offer a key opportunity to expose students to higher education options and career paths and to teach skills that can unlock doors to future career prospects.³ The afterschool hours offer time for apprenticeships, guest speakers, and project-based activities that are not always available during a school day focused on a core curriculum. The state's ESSA plan can use afterschool to reach ESSA's college and career goals.
 - *Literacy:* Although it was not mentioned in ISBE's plan, Title II Part B of ESSA provides grants to "develop or enhance comprehensive literacy instruction" to entities serving "children from low-income families." ESSA specifically states that these literacy initiatives can be "augmented by after-school and out-of-school time instruction." ISBE should take advantage of these opportunities to improve the literacy of high-need populations by coordinating literacy initiatives between in-school and out-of-school time partners.
- **Afterschool Providers as Partners** [Section 3.3 (A)]: We also recommend including afterschool partners in school review teams and in creating the state formula and/or instruments that evaluate the quality of an improvement plan to more fully incorporate comprehensive stakeholder input.
- **Quality Standards:** Our statewide coalition of afterschool providers released Afterschool Quality Standards this past spring, as noted in the draft plan. These Standards were developed in partnership with ISBE and are evidence-based practices that lead to positive youth outcomes.

² Talking Points, Afterschool STEM Hub, <http://www.afterschoolstemhub.org/> (last visited May 1, 2016).

³ Afterschool: Supporting Career and College Pathways for Middle School Age Youth, Afterschool Alliance (Jan. 2011), http://afterschoolalliance.org//documents/issue_briefs/issue_collegeCareer_46.pdf.

Using these Standards will promote overall school improvement and academic achievement. These Standards could address several aspects of the ESSA implementation plan.

- *Multi-Tiered System of Support (MTSS)/ Evidence-Based Interventions* [Section 3.2(A)(i); Section 3.3(B); Section 5.1(A)]: The plan emphasizes the various standards and evidence-based practices schools can use to develop consistent practices to support education for students. We encourage ISBE to incorporate the Illinois Statewide Afterschool Quality Standards into its MTSS because of afterschool's strong ties to the school day and to further promote consistent, high-quality instruction.
- *Training* [Section 4.2(A); Section 5.1(C)]: As ISBE considers training opportunities for school staff, we encourage ISBE to consider training specific to afterschool. Many afterschool instructors are school day teachers as well. Providing training for teachers and school staff on what quality afterschool programs look like through ACT Now's Quality Standards training, which ACT Now offers free of charge, can improve school day academic achievement as well.

Conclusion

- The implementation of ESSA provides Illinois with the opportunity to create a comprehensive vision for student success.
 - In implementing ESSA, we hope that ISBE works to coordinate services for young people so that they have everything they need for success, not only academic supports but coordination with community partners that provide services to promote health, safety, and mentoring.
 - We hope ISBE continues to consider the many aspects of positive youth development and considers afterschool programs as strong partners in creating positive youth outcomes.

The Illinois State Alliance of YMCAs look forward to working hand in hand with ISBE and other key stakeholders to support children and youth through the implementation of ESSA.

Thank you for your consideration.

Submitted by Meg Cooch, Executive Director, Illinois State Alliance of YMCAs, 872-802-4177

My name is Karen Bounds (klbnds522@gmail.com). I retired last spring after working as a certified school librarian in a K-12 school and a high school for a total of 29 years. I am presently the chairperson for the Illinois State Library advisory committee and am a past president of the Illinois Heartland Library System.

Observations related to ISBE proposal:

Where are the school libraries in this proposal?

The United States is considered a top notch place to attain an education. This education is supposed to be available to all of our citizens. If we purposefully erode that education by limiting our youngest citizens to access well run school libraries staffed by dedicated individuals who have received certification in the field of library and information technology, where will our “informed citizenry” be? How will they determine whether information given to them is correct?

Look at the countries of the world that are in turmoil. Their people are denied access to education and libraries. We see daily on TV what this lack of intellectual development does to people.

Not all students have the luxury of visiting public libraries. The very young have to depend on their parents, grandparents or other care givers to take them to the public library. This is not always possible due to time constraints, transportation issues or lack of interest on the part of the adult. The school library is the **great equalizer of public education** because it allows ALL students to access the best reading materials (print or digital) that are available.

The tools of education changed dramatically in the time I was employed as a librarian. Both schools where I worked suffered the growing pains of technology as it advanced rapidly and required a continually increasing supply of money for each school district to even hope to keep up with the latest and greatest offerings. While technology and the internet have been wonderful additions to education, we do not as yet have the technology available to imbed microchips in our brains to have access to downloaded information directly – we still must be willing and able to READ.

The internet is a wonderful tool, but it is not the only one that should be used to educate our students. Not all information found on the internet is complete or accurate. Someone had to choose to post it. Do we limit our students in their educational development to an internet that contains materials that are sometimes incomplete, biased, or downright dangerous? Do we throw out all of the years of the accumulated knowledge of mankind that is in print because we are too lazy or ignorant to go to the library and read its wealth of information? Do we allow an unknown “someone” to be in charge of what we read on the internet? Shouldn’t we teach our children to consider all points before making a decision?

The best school libraries:

The best school libraries have certified librarians who have the knowledge to teach their students how to find the most appropriate information available to them whether it is in print or in the digital world. School librarians help students know where their information originated. Has it been written by someone who is a legitimate author and has his or her name with the document? Has the information been vetted for accuracy? Is the information biased to one point of view? Did another student write the article for a project and post it? Is there a list of references attached to the article to indicate where the author retrieved the information to create the article? Were the references checked to be certain they exist? This is part of the research process that allows students to be successful in college, trade schools and life.

The best school libraries have certified librarians who collaborate with the teachers for projects to go along with what students are learning in the classroom.

The best school libraries have certified librarians who follow a library curriculum that is appropriate to the grade level of the students.

The best school libraries have certified librarians who love to read and pass on to students that enthusiasm for reading – whether it is for pleasure or finding information that interests the student.

The best school libraries have school administrators and teachers who have been taught to understand the place of the school library and certified librarian in education.

The best school libraries have school administrators who fund the library in a manner that allows it to offer the best digital information and print materials to the students that are available.

The best school libraries have school administrators who understand that students need to have free access to the library before, during and after school.

Finally, the best schools have a certified librarian in EACH school building to allow ALL students the best education the district can offer.

Thank you.

Karen Bounds
klbnds522@gmail.com



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October 5, 2016

Illinois State Board of Education
100 North First Street
Springfield, IL 62777-0001

To Whom It May Concern,

The Lake Forest Symphony exists to present exciting, outstanding, and diverse musical programs of the highest artistic quality for audiences of all ages. Because education is extremely important, the Lake Forest Symphony strives to reach as many young children and students as we can during our subscription season. Currently, our outreach reaches thousands of school children throughout Northern Illinois. We accomplish this through our age-appropriate Youth Concerts. These programs bring students to the performance hall to hear the full orchestra perform a program specifically geared towards their age group. As the Illinois State Board of Education (ISBE) develops its plan to implement the Every Student Succeeds Act (ESSA), we ask for your consideration of the following items.

We ask that in implementing ESSA in Illinois, you:

-include access to arts education as part of the state's accountability formulas and systems being developed to meet the ESSA requirements. ESSA language is very clear that states must now include multiple progress measures in assessing school performance. **These can include measures like student engagement, parental engagement and school culture/climate—all which are achieved by the arts in schools.** These measures can be very important in determining the outside supports their students may not be getting that could help them be more successful.

-encourage school districts to include arts education as part of the well-rounded section of Title I schoolwide plans under ESSA; encourage use of Title 1 funds to meet curriculum goals to serve all students

-emphasize the role of arts education in meeting school goals for parent and family engagement, a key component of ESSA; the arts bring a sense of community to schools, and celebrate student accomplishment at every level.

-include arts education teachers as the state assesses its needs and opportunities for ALL students as part of the state's Title IV-A Well-Rounded Education needs assessment.

-encourage all districts to include the arts in their Title IV-A needs assessment and consider funding for arts education via ESSA Student Support and Academic Enrichment Grants (Title IV) so as to assure access and opportunity for arts education for all students.

As part of ESSA’s definition of “well-rounded”, I believe the arts should be taught to every Illinois student. Please **ensure that the arts are a core part of evidence-based budgeting**, and that there is funding for the arts in the next Illinois state budget.

ESSA updated the definition of STEM (Science, Technology, Engineering, and Math) to include the arts. Some call this “STEM to STEAM.” Given that the federal law considers the arts as part of STEM, please consider including the arts as eligible for STEM funding in the education budget.

Thank you for your time and consideration of these important educational priorities. Please feel free to reach out to Ingenuity (312-583-7459) or Arts Alliance Illinois (312-855-3105) for more information on the many benefits of arts in schools.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Lape". The signature is fluid and cursive, with the first name "Susan" and the last name "Lape" clearly distinguishable.

Susan Lape, Executive Director

Lake Forest Symphony
400 E Illinois Rd
Lake Forest, IL 60045
847.295.2135
susan@lakeforestsymphony.org

September 27, 2016

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777
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RE: Comments on the first draft of ISBE's ESSA State Plan

“Every Student Succeeds Act” A Compendium of Accountability Considerations for Illinois

The Latino Policy Forum is the only organization in the Chicago area whose primary focus is to facilitate inclusion at all levels of policy decision-making processes in Illinois. Its work is focused on listening to and involving many voices—educators at all levels and areas of responsibility, community representatives, parents, elected officials, researchers—to ensure that the next generation has every opportunity to succeed. The Forum works to inform the community, promote participatory policy-making, and lead advocacy efforts that result in positive improvements and access for all to high quality programs. Its education agenda includes both improving academic achievement for Latino students and English learners (ELs) and closing the achievement gaps between them and non-Latino students.

Background

According to Illinois census data, close to one-in-four public school children speak a language other than English in their homes. The number who identify as ELs—close to one-in-ten students—has grown an astonishing 83 percent over the last 15 years. As these students transition into general education classrooms, a majority of their teachers will likely work with them at some point in their careers. Given their increasing numbers, the Forum, along with its community colleagues, believes that the U.S. Department of Education is making progress by supporting EL learning in various ways through the Every Student Succeeds Act (ESSA).

ESSA Framework for Bilingual/Biliteracy Goals

ESSA presents a unique opportunity for each state to develop implementation plans. The State Seal of Biliteracy, enacted in more than twenty states including Illinois, offers yet another legislated opportunity to meet the cultural and linguistic educational needs of today's children. The Seal ensures that high school graduates achieve college-/career-ready language skills in both English and another language. It offers an effective way to expand both world language programming and the education of ELs. State accountability and assessment systems under ESSA must align with efforts to achieve the State Seal of Biliteracy.

ESSA State Plan Feedback

In accordance with the Illinois State Board of Education request for feedback on its ESSA State Plan-Draft #1, the Forum offers the following important recommendations along with the considerations that motivated them. There are two recommendations for Section 2 of the Plan: *Challenging State Academic Standards and Academic Assessments* and six for Section 3: *Accountability, Support, and Improvement for Schools*.

A Cohesive Illinois Plan for ELs in Illinois within the ESSA Framework:

For more information contact: Karen Garibay-Mulattieri, Education Manager, Kgaribay-mulattieri@latinopolicyforum.org and Rebecca Vonderlack-Navarro, Senior Policy Analyst, rvnavarro@latinopolicyforum.org.

Illinois State Board of Education

Title I and Title III Implementation—Considerations and Recommendations

Below are important considerations referenced to the ISBE ESSA State Plan-Draft #1 that constrain or allow for the recommendations that follow.

Section 2.1 Challenging State Academic Standards (p.6) consideration: Title I requires that states apply a uniform criteria to qualify students as English learners (ELs). According to the Early Childhood Education Mandate for bilingual education in Article 14C of the ILSC, students in Illinois are identified as ELs upon entering the school system. Parents fill out a home language survey and early childhood students are assessed with an English proficiency assessment to determine their placement and required services to ensure academic success. Screening EC students in primary language is not mandated by ESSA; however it is best practice in early education.¹ It is vital to consider native language screening and assessment in early childhood settings. Teachers will not capture a full understanding of a student's knowledge and skills if they only assess children in the language in which they are least proficient.

√ *Recommendation: ISBE should maintain the current practice of identifying ELs as they enter early childhood education and should encourage native language screening as part of the identification process.*

√ *ISBE must scale up efforts to provide quality early childhood education which matches a child's cultural and linguistic needs.*

Section 3.1 Accountability System (p.13) consideration: Title I of ESSA requires that states determine a timeline for English learners to become English proficient and to be reclassified. According to Title III regulations, Local Education Agencies (LEA) will be required to report EL students not attaining English proficiency within five years of initial classification and enrollment. States will provide information on how the five years will be counted as part of the state plan to be filed with the U.S. Department of Education. Currently in Illinois EL students are identified and served in early childhood education, however years of service are counted beginning in first grade. First grade is the first compulsory grade in the Illinois school system. Historically, services offered in EC or kindergarten was not counted toward years in program for this reason.

√ *Recommendation: ISBE should maintain the practice of counting years of service for EL instruction beginning in first grade for the purposes of the ESSA State Accountability Plan.*

Section 3.1 Accountability System (p.13) consideration: Under Title I, English proficiency data will be reported at the school level in grades 3-12 as part of the required accountability system. This is a change from NCLB, where English Language Development (ELD) was reported under AMAO targets at the district level for all students K-12. Under NCLB, all English learners K-2 participated in the annual measure of English Proficiency assessment known as ACCESS. Schools use the data from these assessments to make decisions about student placement and instruction. Parents also request assurance that their children are making progress toward English proficiency.

√ *Recommendation: ISBE should continue the current practice of annual language proficiency assessments K-12 as part of the assessment and accountability plan under ESSA.*

√ *ISBE should consider K-12 growth along a continuum of proficiency as the EL academic indicator for accountability purposes.*

Section 3.1 Accountability System (p.17) consideration: Title I under ESSA requires that data on English proficiency be reported in two ways, growth and attainment. States must determine the level of acceptable growth to factor into the accountability system. English learners, however, are a diverse group of students with a variety of factors impacting their progress. Factors can include time of entry into the U.S. school system, level of prior education, refugee status, trauma suffered while immigrating to the U.S., gaps in schooling, as well as the age of the student. Illinois belongs to the WIDA Consortium which has a strong research department with access to student’s data from multiple states. WIDA reports scaled scores for each of the language domains, making it possible to compare growth over time along a continuum of proficiency—which is preferred over reporting reclassification rates of ELs (See Darling-Hammond and colleagues 2016 p. 12).ⁱⁱ ISBE should consider how to best weight this indicator for schools with very few or no EL students. The accountability system should not privilege or reward schools based on demographicsⁱⁱⁱ.

√ *Recommendation: ISBE must ensure the ESSA Accountability System does not incentivize reclassifying students too soon as a means to boost proficiency attainment rates.*

√ *Recommendation: ISBE ensure that the accountability system provides equitable attention to all ELs and their growth.*

√ *Recommendation: ISBE must design accountability indicators to foster home language instruction as a means of transferring content knowledge that contributes toward high levels of achievement on English content exams.*

√ *Recommendation: The growth measure for English Language Development and the weighting of this indicator- should be informed by the Illinois Advisory Council on Bilingual Education and the research team at the WIDA Consortium*

Sections 2.1 Student Academic Assessments (p.7) and 3.1 Accountability System

(p. 15) consideration: New Title I regulations call for states to make every effort possible to offer academic content assessments in languages other than English when 30 percent or more of English learners speak the same language. Illinois has a Spanish speaking population which comprises more than 80 percent of the ELs enrolled EC-12. The PARRC assessment is currently in use in Illinois and the assessment for mathematics is available in Spanish, however the literacy assessments are only available in English. Other states such as California have adopted Common Core en Español and are developing assessments in Spanish for their EL students. The federal government strongly encourages that a portion of Title I funds be used to create Spanish language literacy and science assessments aligned to college and career readiness standards. Having Spanish literacy assessment ensures that schools will follow empirically based best practice in bilingual instruction instead of implementing “Structured English Immersion” approaches which affect student outcomes in the middle grades.

√ *Recommendation: ISBE must ensure the availability of native language literacy assessments in Spanish for grades 3-8, to ensure validity and reliability of content assessments for the largest language group served in English Learner programming.^{iv}*

Section 3.1 Accountability System (p.13) Consideration: Under ESSA, states must set ambitious goals for subgroups of students. States are to establish multiyear, ambitious, long-term goals for all students and separately

for each subgroup of students for the following areas: academic achievement, as measured by proficiency on the annual assessments; high school graduation rates; closing statewide proficiency and graduation rate gaps; and English language proficiency for ELs.

Subgroups are identified as:

For more information contact: Karen Garibay-Mulattieri, Education Manager, kgaribay-mulattieri@latinopolicyforum.org and Rebecca Vonderlack- Navarro, Senior Policy Analyst, rvnavarro@latinopolicyforum.org.

- economically disadvantaged students
- students from major racial and ethnic groups
- children with disabilities
- English Learners

The minimum number of students used to form a subgroup shall be determined by the state and the same State-determined number is used for all students and subgroups. The “N” count for the subgroup size should be reconsidered for both reporting and accountability purposes. Setting the “N” size at 20 for disaggregating subgroup data would bring the accountability plan into alignment with the ILSC Article 14 C which mandates bilingual education when an attendance center has 20 or more students speaking the same language. Reducing the N count would give more schools a subgroup and offer valuable information on English learners to drive school improvement given the various instructional designs implemented across the state.

√ Recommendation: ISBE must consider options for making the ESSA Accountability Plan subgroup size align to existing statute in ILSC Article 14C.

Section 3.1 Accountability System (p.13-14) consideration: Under Title I, states must develop new accountability systems with interim measures of progress. Goals and interim measures must be designed to enable subgroups that are behind on achievement and graduation rate to make significant progress in closing the gap. Indicators—for all students and separately for each subgroup of students, include the following indicators:

- Proficiency or attainment
- Elementary/middle school growth OR other indicator
- High school adjusted graduation rates
- English Language proficiency
- Other indicator of school quality or student success
- Optional—High school growth
- Optional—Elementary/middle school other
- Optional—High school extended graduation rate

“Substantial weight” must be given to achievement, graduation rate or the other academic indicator and English proficiency. In the aggregate, they must receive “much greater weight” than the indicator(s) of school quality or student success.

Growth and proficiency on content assessments are mentioned in the new ESSA law. Proficiency should not be assessed simply by the percentage of students scoring proficient on state exams. Under NCLB, this practice focused schools’ efforts on those students who were close to meeting standards, leaving others further behind. The Forum echoes the recommendations of other stakeholders for encouraging the use of a proficiency index, which will focus attention on the growth of all students in a manner which is fair and reliable. Growth measures for high school are also important for ELs. Illinois has recently decided to use the SAT as the high school assessment for accountability purposes which will be given in eleventh grade. If the assessment only yields one data point, opportunities for improvement will be lost at the secondary level. Schools with significant immigrant populations will be at a disadvantage. Students who arrive to the U.S. in the middle grades and up have difficulty with the text level of college entrance exams which are written for native speakers. It is important to note, SAT does not offer accommodations or native options. Unless Illinois is able to implement a system which also captures growth at the secondary level, schools which serve as ports of entry will be adversely affected.

√ Recommendation: ISBE must design an accountability system which weights growth in academic content for secondary students as well as for those in grades 3-8.

Section 3.1 Accountability System (p.13-14) consideration: The “Every Student Succeeds Act” stipulates that former ELs may be included in the accountability measures for the EL subgroup up to 4 years after they transition into the mainstream. Former ELs are those who have met state criteria for English proficiency and are reclassified. This means data from the former EL students will be aggregated along with those who are still enrolled in language assistance programs. Data from Illinois on ISAT demonstrates that the transitioned ELs tend to outperform their peers in mathematics and reading. Students who are in the process of acquiring English and who are identified as active ELs typically do not have enough English proficiency to meet standards on assessments administered in a language they are still acquiring. The Forum cautions the ISBE in grouping together the performance of current and former English Learners. Aggregating the data does not give an accurate portrayal of either groups’ progress or needs.

√ *Recommendation:* ISBE should report the progress of each EL group (those active in the program and those who have transitioned) separately so schools can determine the effectiveness of instruction.

The new ESSA law under Title 1 allows for states to follow the progress of former ELs for four years. The Forum recommends the EL students to be part of a continuous monitoring system following students as they enter the system through enrollment in post-secondary. Longitudinal data beginning in early childhood would serve as a vital indicator of a school district’s effectiveness in minimizing achievement gaps for ELs—achievement gains that are likely to occur after the four-year tracking stipulation. ^v Such an approach is bolstered by research that states that it takes ELs between 5 to 7 years to be on par with their English speaking colleagues. ^{vi}

√ *Recommendation:* ISBE should design the ESSA accountability system to report on the progress of former ELs 3-12.

Summary

The new ESSA legislation affords Illinois the opportunity to refine current practices for accountability with respect to ELs and to create a cohesive system from early childhood through grade 12. Schools which provide services to the subgroup and their families will be able to show progress toward both academic success on content area assessments and steady progress in supporting students in developing their academic English. The languages and cultures of the students in Illinois should be integrated into the learning environment and enhanced for life long success.

ⁱ Policy Statement on Supporting the Development of Children Who are Dual Language Learners in Early Childhood Programs,” A joint statement by the U.S. Department of Health and Human Services and U.S. Department of Education. Accessed on July 21, 2016: https://www.acf.hhs.gov/sites/default/files/ece/dll_policy_statement_final.pdf

ⁱⁱ Darling-Hammond, L., S. Bae, C. Cook-Harvey, L. Liang, C. Mercer, A. Podolsky, and E. Stosich (2016) “Pathways to New Accountability Through the Every Student Succeeds Act,” Accessed on August 31, 2016: https://learningpolicyinstitute.org/wp-content/uploads/2016/04/Pathways_New-Accountability_Through_Every_Student_Succeeds_Act_04202016.pdf

ⁱⁱⁱ Marion, S. (2016) “Considerations for State Leaders in the Design of School Accountability Systems Under the Every Student Succeeds Act,” National Center for the Improvement of Educational Assessment

^{iv} Abedi, Jamal (2009) “Assessment of English Learners,” Presentation to the Race to the Top Assessment Program Public and Expert Input Meeting.

^v “Statement from the Working Group on ELL Policy Re: Every Student Succeeds Act of 2015,” (2016). Accessed on May 25, 2016: <http://ellpolicy.org/wp-content/uploads/ESSAComments.pdf>

^{vi} Cummins, Jim (2003) “Bilingual Children’s Mother Tongue: Why Is It Important for Education?” Rethinking Schools: On-line Urban Educational Journal. Accessed on June 10, 2013: <http://iteachilear.org/cummins/mother.htm>

“Every Student Succeeds Act” A Compendium of Accountability Considerations for Illinois

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ESSA Framework for Bilingual/Biliteracy Goals

ESSA presents a unique opportunity for each state to develop implementation plans. The State Seal of Biliteracy, enacted in more than twenty states including Illinois, offers yet another legislated opportunity to meet the cultural and linguistic educational needs of today's children. The Seal ensures that high school graduates achieve college-/career-ready language skills in both English and another language. It offers an effective way to expand both world language programming and the education of ELs. State accountability and assessment systems under ESSA must align with efforts to achieve the State Seal of Biliteracy.

ESSA State Plan Feedback

In accordance with the Illinois State Board of Education request for feedback on its ESSA State Plan-Draft #1, the Forum offers the following important recommendations along with the considerations that motivated them. There are two recommendations for Section 2 of the Plan: *Challenging State Academic Standards and Academic Assessments* and six for Section 3: *Accountability, Support, and Improvement for Schools*.

A Cohesive Illinois Plan for ELs in Illinois within the ESSA Framework: Title I and Title III Implementation—Considerations and Recommendations

Below are important considerations referenced to the ISBE ESSA State Plan-Draft #1 that constrain or allow for the recommendations that follow.

- **Section 2.1 Challenging State Academic Standards (p.6)** consideration: Title I requires that states apply a uniform criteria to qualify students as English learners (ELs). According to the Early Childhood Education Mandate for bilingual education in Article 14C of the ILSC, students in Illinois are identified as ELs upon entering the school system. Parents fill out a

home language survey and early childhood students are assessed with the Pre-IPT to determine their placement and required services to ensure academic success. Illinois should maintain the current practice of identifying ELs early and providing quality early childhood education which matches a child's cultural and linguistic needs.

√ Recommendation: Screening EC students in primary language is not mandated by ESSA, however it is best practice in early education.¹ It is vital to consider native language screening and assessment in early childhood settings. Teachers will not capture a full understanding of a student's knowledge and skills if they only assess children in the language in which they are least proficient.

- **Section 3.1 Accountability System (p.13)** consideration: Title I of ESSA requires that states determine a timeline for English learners to become English proficient and to be reclassified. According to Title III regulations, Local Education Agencies will be required to report EL students not attaining English proficiency within five years of initial classification and enrollment. States will provide information on how the five years will be counted as part of the state plan to be filed with the U.S. Department of Education.

√ Recommendation: Currently in Illinois EL students are identified and served in early childhood education, however years of service are counted beginning in first grade. First grade is the first compulsory grade in the Illinois school system. Historically, services offered in EC or kindergarten were not counted toward years in program for this reason. The Forum recommends maintaining this practice for the purposes of ESSA.

- **Section 3.1 Accountability System (p.13)** consideration: Under Title I, English proficiency data will be reported at the school level in grades 3-12 as part of the required accountability system. This is a change from NCLB, where English Language Development (ELD) was reported under AMAO targets at the district level for all students K-12.

*√ Recommendation: Under NCLB, all English learners K-2 participated in the annual measure of English Proficiency assessment known as ACCESS. Schools use the data from these assessments to make decisions about student placement and instruction. Parents also request assurance that their children are making progress toward English proficiency. **ISBE should consider K-2 growth along a continuum of proficiency as a nonacademic indicator for accountability purposes.** The Forum recommends that Illinois continue the current practice of annual language proficiency assessments K-12 to enable teachers and parents to monitor the progress of all ELs.*

- **Section 3.1 Accountability System (p.17) consideration:** Title I under ESSA requires that data on English proficiency be reported in two ways, growth and attainment. States must determine the level of acceptable growth to factor into the accountability system. English learners, however, are a diverse group of students with a variety of factors impacting their progress. Factors can include time of entry into the U.S. school system, level of prior education, refugee status, trauma suffered while immigrating to the U.S., gaps in schooling, as well as the age of the student. The new law also mentions the responsibility of states to weight this indicator in the accountability system.

√ Recommendation: Illinois belongs to the WIDA Consortium which has a strong research department with access to students data from multiple states. WIDA

reports scaled scores for each of the language domains, making it possible to compare growth over time along a continuum of proficiency—which is preferred over reporting reclassification rates of ELs (See Darling-Hammond and colleagues 2016 p. 12).ⁱⁱ The growth measure for English Language Development and the weighting of this indicator- should be informed by the Illinois Advisory Council on Bilingual Education and the research team at the WIDA Consortium. ISBE should consider the weighting of this indicator for schools with EL populations less than 20. The accountability system should not privilege or reward schools based on demographicsⁱⁱⁱ. Other considerations:

-Ensuring the accountability system does not incentivize reclassifying students too soon as a means to boost proficiency attainment rates. Research shows if students are transitioned too soon, they do not have the academic language and/or content knowledge to perform without appropriate supports.

-Ensure that the system provides equitable attention to all ELs and their growth. The Forum cautions against a system that might focus too much on children right below the proficiency threshold.

-Acknowledge the role of home language instruction as a means of transferring content knowledge that contributes toward high levels of achievement on English content exams.

- **Sections 2.1 Student Academic Assessments (p.7) and 3.1 Accountability System (p. 15) consideration:**

New Title I regulations call for states to make every effort possible to offer academic content assessments in languages other than English when 30 percent or more of English learners speak the same language. Illinois has a Spanish speaking population which comprises more than 80 percent of the ELs enrolled EC-12. The PARRC assessment is currently in use in Illinois and the assessment for mathematics is available in Spanish, however the literacy assessments are only available in English. Other states such as California have adopted Common Core en Español and are developing assessments in Spanish for their EL students.

√ *Recommendation: Ensure native language literacy assessments in Spanish for grades 3-8, to ensure validity and reliability of content assessments for the largest language group served in English Learner programming.^{iv} The federal government strongly encourages that a portion of Title I funds be used to create Spanish language literacy and science assessments aligned to college and career readiness standards. Having Spanish literacy assessment ensures that schools will follow empirically based best practice in bilingual instruction instead of implementing “Structured English Immersion” approaches which affect student outcomes in the middle grades.*

- **Section 3.1 Accountability System (p.13) Consideration:** Under ESSA, states must set ambitious goals for subgroups of students. States are to establish multiyear, ambitious, long-term goals for all students and separately for each subgroup of students for the following areas: academic achievement, as measured by proficiency on the annual assessments; high school graduation rates; closing statewide proficiency and graduation rate gaps; and English language proficiency for ELs.

Subgroups are identified as:

- economically disadvantaged students
- students from major racial and ethnic groups
- children with disabilities
- English Learners

The minimum number of students used to form a subgroup shall be determined by the state and the same State-determined number is used for all students and subgroups.

√ Recommendation: The “N” count for the subgroup size should be reconsidered for both reporting and accountability purposes. Setting the “N” size at 20 for disaggregating subgroup data would bring the accountability plan into alignment with the ILSC Article 14 C which mandates bilingual education when an attendance center has 20 or more students speaking the same language. Reducing the N count would give more schools a subgroup and offer valuable information on English learners to drive school improvement given the various instructional designs implemented across the state

- **Section 3.1 Accountability System (p.13-14)** consideration: Under Title I, states must develop new accountability systems with interim measures of progress. Goals and interim measures must be designed to enable subgroups who are behind on achievement and graduation rate to make significant progress in closing the gap. Indicators—for all students and separately for each subgroup of students, include the following indicators:
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 - English Language proficiency
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 - Optional—High school growth
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 - Optional—High school extended graduation rate
 - “Substantial weight” must be given to achievement, graduation rate or the other academic indicator, and English proficiency. In the aggregate, they must receive “much greater weight” than the indicator(s) of school quality or student success.

√ Recommendation: Growth and proficiency on content assessments are mentioned in the new ESSA law. Proficiency should not be assessed simply by the percentage of students scoring proficient on state exams. Under NCLB, this practice focused schools’ efforts on those students who were close to meeting standards, leaving others further behind. The Forum echoes the recommendations of other stakeholders for encouraging the use of a proficiency index, which will focus attention on the growth of all students in a manner which is fair and reliable.

-Growth measures for high school are also important for ELs. Illinois has recently decided to use the SAT as the high school assessment for accountability purposes which will be given in eleventh grade. If the assessment only yields one data point, opportunities for improvement will be lost at the secondary level. Schools with significant immigrant populations will be at a disadvantage. Students who arrive to the U.S. in the middle grades and up have difficulty with the text level of college entrance exams which are written for native speakers. It is important to note, SAT does not offer accommodations or native options. Unless Illinois is able to

implement a system which also captures growth at the secondary level, schools which serve as ports of entry will be adversely affected.

- **Section 3.1 Accountability System (p.13-14) consideration:** The “Every Student Succeeds Act” stipulates that former ELs may be included in the accountability measures for the EL subgroup up to 4 years after they transition into the mainstream. This means data from the former EL students will be aggregated along with those who are still enrolled in language assistance programs. Data from Illinois on ISAT demonstrates that the transitioned ELs tend to outperform their peers in mathematics and reading. Students who are in the process of acquiring English and who are identified as active ELs typically do not have enough English proficiency to meet standards on assessments administered in a language they are still acquiring.

√ *Recommendation: Former ELs are those who have met state criteria for English proficiency and are reclassified. ESSA requires states to follow these students for four years and to combine their performance on academic content assessments with the active ELs. The Forum cautions the ISBE in grouping together the performance of current and former English Learners. Aggregating the data does not give an accurate portrayal of either groups’ progress or needs. **The Forum recommends reporting the progress of each group separately, the percentage of former ELs meeting state standards should be reported as an academic indicator.***

The new ESSA law under Title 1 allows for states to follow the progress of former ELs for four years. The Forum recommends the EL students to be part of a continuous monitoring system following students as they enter the system through enrollment in post-secondary. Longitudinal data beginning in early childhood would serve as a vital indicator of a school district’s effectiveness in minimizing achievement gaps for ELs—achievement gains that are likely to occur after the four-year tracking stipulation.^v Such an approach is bolstered by research that states that it takes ELs between 5 to 7 years to be on par with their English speaking colleagues.^{vi}

Summary

The new ESSA legislation affords Illinois the opportunity to refine current practices for accountability with respect to ELs and to create a cohesive system from early childhood through grade 12. Schools which provide services to the subgroup and their families will be able to show progress toward both academic success on content area assessments and steady progress in supporting students in developing their academic English. The languages and cultures of the students in Illinois should be integrated into the learning environment and enhanced for life long success.

ⁱ Policy Statement on Supporting the Development of Children Who are Dual Language Learners in Early Childhood Programs,” A joint statement by the U.S. Department of Health and Human Services and U.S. Department of Education. Accessed on July 21, 2016: https://www.acf.hhs.gov/sites/default/files/ecd/dll_policy_statement_final.pdf

ⁱⁱ Darling-Hammond, L., S. Bae, C. Cook-Harvey, L. Liam, C. Mercer, A. Podolsky, and E. Stosich (2016) “Pathways to New Accountability Through the Every Student Succeeds Act,” Accessed on August 31, 2016:

[https://learningpolicyinstitute.org/wp-content/uploads/2016/04/Pathways New-Accountability Through Every Student Succeeds Act 04202016.pdf](https://learningpolicyinstitute.org/wp-content/uploads/2016/04/Pathways_New-Accountability_Through_Every_Student_Succeeds_Act_04202016.pdf)

ⁱⁱⁱ Marion, S. (2016) "Considerations for State Leaders in the Design of School Accountability Systems Under the Every Student Succeeds Act," National Center for the Improvement of Educational Assessment

^{iv} Abedi, Jamal (2009) "Assessment of English Learners," Presentation to the Race to the Top Assessment Program Public and Expert Input Meeting.

^v "Statement from the Working Group on ELL Policy Re: Every Student Succeeds Act of 2015," (2016). Accessed on May 25, 2016: <http://ellpolicy.org/wp-content/uploads/ESSAComments.pdf>

^{vi} Cummins, Jim (2003) "Bilingual Children's Mother Tongue: Why Is It Important for Education?" Rethinking Schools: On-line Urban Educational Journal. Accessed on June 10, 2013: <http://iteachlear.org/cummins/mother.htm>

LEGAL COUNCIL FOR HEALTH JUSTICE

AIDS LEGAL COUNCIL
HOMELESS OUTREACH PROJECT
CHICAGO MEDICAL-LEGAL PARTNERSHIP FOR CHILDREN

October 5, 2016

Illinois State Board of Education
100 N. First Street
Springfield, IL 62777

Sent via email to: essa@isbe.net

RE: Comments on the first draft of ISBE's ESSA State Plan

To Whom It May Concern:

The mission of the Legal Council for Health Justice is to use the power of the law to secure dignity, opportunity, and well-being for people facing barriers due to illness or disability. Through judicial, administrative, and legislative advocacy, the Legal Council identifies health-harming legal needs and addresses them through our three medical-legal partnerships.

The Chicago Medical-Legal Partnership for Children (CMLPC) is a program of the Legal Council for Health Justice. The program assists some of the most at-risk and medically complex children and their families in Illinois who have a combination of social, medical, and educational needs; such as problems accessing health insurance, Medicaid, children's SSI, Early Intervention, and special education. More than one-third of our clients experience problems accessing special education or early intervention services and supports. Most of the families and individuals we serve would never access legal assistance unless they were referred to us by medical staff or because they can have face-to-face meetings with our staff who are co-located at partnership sites. The individual representation we provide and close work with medical providers fuels the policy initiatives we engage in across state systems.

Amy Zimmerman, director of CMLPC, serves on a variety of children's health and education committees and is currently a Governor appointed member of the Illinois Early Intervention Interagency Council and an appointed member of the Illinois Attorney General's Special Education Advisory Committee. Amy also serves on a number of subcommittees of the Early Learning Council and was recently chosen to be part of the national Children's Health Leadership Network.

Because CMLPC's work has a strong focus on at-risk children from birth to 5, including those with developmental delays or disabilities, we appreciate the opportunity to offer feedback on the first draft of this plan. Indeed, ESSA offers many opportunities to enhance early learning and improve the transition between preschool programs and K-12. The ISBE state plan provides an opportunity to meet the needs of the whole child as well as complement IDEA Part B requirements for children with developmental delays and disabilities. Illinois' state plan, if appropriately conceived and implemented, has the promise of improving child performance and long-term outcomes for all children.

Overall, the state plan would benefit by putting additional focus on preschool services and supports for children with developmental delays and disabilities in all aspects of the state plan. Preschool education is effective at improving social and cognitive skills for 3 and 4 year olds with developmental delays and disabilities. Multiple studies have shown that preschool special education services, particularly those provided in blended settings, have resulted in significant improvements in children's early literacy, mathematics, and social skills. In addition, children's improvements are maintained into their early elementary years. Blended programs that include typically developing children and children with disabilities or delays have been shown to benefit both groups of students socially and academically.

Illinois' state plan should recognize the cost-effectiveness and positive impact of preschool programs and the importance of providing children with special needs a continuum of preschool placement options—including full-day opportunities.

Our specific comments are organized by section below.

Section 1.2 Coordination

Under 1.2A (page 5), Illinois should consider including an emphasis on aligning data systems to assist in coordination efforts. By having comparable and sharable data across child serving systems in Illinois, policymakers will be able to see changes in the overall student population, trends for different student demographics, and programs correlated with positive or negative outcomes. For example, tracking students who receive Early Intervention (EI) services as well as those found ineligible, throughout their educational career could show whether those students need more or less special education services in the future. This information could better inform decisions regarding allocation of funding for Early Intervention, early childhood special education and targeted Child Find efforts.

Section 2.1 Challenging State Academic Standards

Under 2.1 (page 6), Illinois should take note of the primary language as identified in language assessments upon a child entering the school. Early childhood screenings to identify a student's knowledge and skills should be in the student's native language for an accurate assessment of understanding. ESSA should reflect the importance of screening a student in their native language as early as preschool.

Section 3.3 State Support and Improvement for Low-performing Schools

Under 3.3A (page 27-30), Illinois describes the use of funds to further develop the multi-tiered system of support (MTSS). One important initiative should include Illinois allocation of funds for the MTSS to establish wellness centers in each school district. Like the Chicago Public Schools' Office of Student Health and Wellness (OSHW), which aims to remove health-related barriers to learning so that students may succeed in education, career, and life, each school district should be required to offer this service. By connecting students and families to support services they need, including SNAP, Medicaid, or All Kids, families are able to stabilize, creating a more supportive environment for learning. The achievement gap can be linked to socioeconomic factors. One national study documented that, before kindergarten entry, the average cognitive scores of affluent children were 60 percent higher than those of low-income children. By providing supports to low-income families through resources like the CPS OSHW, Illinois will help close the achievement gap.

4.2 Support for Educators

Under 4.2B (page 37-39), Illinois' plan should emphasize that parents/guardians are a crucial part of the multi-tiered system of support (MTSS). Ensuring that teachers, principals, and other school leaders are trained and comfortable with involving parents/guardians in decisions regarding their children, particularly children with IEPs or 504 plans, will help keep parents/guardians to be more engaged and aware of their children's well-being. Parents/guardians can be crucial in identifying and overcoming student barriers to learning, making them invaluable resources in the MTSS.

Also related to 4.2B, ISBE should support Senate Bill 565, HA 1--proposed state legislation that would require social and emotional screenings as part of the Illinois child health examination requirements. This legislation will help ensure that medical providers conduct regular screenings, will serve to destigmatize social and emotional health issues and, where necessary, help connect children to services.

In addition, Illinois should monitor school district Child Find activities. While Child Find is legally required by federal and state law, there is little to no accountability. With increased marketing, event frequency, and reliability and better coordination with Early Intervention, school districts could identify more young children birth to 5 who are eligible for Early Intervention and/or special education. If these children are identified early, they have a greater chance to catch-up to their typically developing peers by age 5. Increasing funding for and accountability of school district Child Find efforts will save resources long term and benefit all children.

5.1 Well-Rounded and Supportive Education for Students

Under 5.1A (page 41-45), the draft plan states that it aims to support the continuum of a student's education which "begins at birth and extends through to postsecondary education and careers." We commend ISBE for recognizing the importance of a continuum of care, particularly understanding that the continuum begins at birth. However, Illinois should put a greater emphasis on implementation of transitions from stage to stage. Particularly when a child in Early Intervention turns 3, it is important to ensure that the child receives an IEP, if needed and receives appropriate preschool special education services and supports. Once again, the transition from preschool to K-12 is of particular importance for children with IEPs. A lapse in services can be detrimental for these students, potentially delaying or regressing progress made previously. The programs and guidelines mentioned in the draft plan (Illinois Early Learning Guidelines and Birth to 5 Program Standards) do not explicitly or extensively address transitions for children with developmental delays or disabilities, for which transitions are critically important. In fact, Part C and Part B 619 Data published in 2016 indicates that over 20% of African American infants and toddlers exit Part C without Part B eligibility determined.

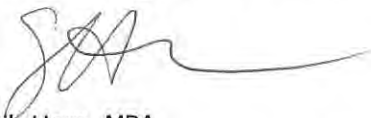
Additionally, to further improve the quality of instruction for preschool students and decrease school day disruptions, ISBE's state plan should detail instructions for all school districts to bring preschool special education instruction and related services directly to Head Start locations. By eliminating the need for transportation of these students to and from Head Start locations, Illinois could save money, support continuity of care and open up more preschool special education spots to non-Head Start participating children. Head Start providers are open to preschool providers coming directly to their locations to provide the preschool education services that families need but that Head Start doesn't have the resources to provide.

Thank you for this opportunity to provide initial feedback. The Legal Council for Health Justice recognizes that there will be additional opportunities to provide comment on the ESSA Illinois State Plan. We hope to provide more comprehensive feedback on later drafts both independently and as part of a supporting all students workgroup being convened by the Early Learning Council.

Sincerely,



Amy Zimmerman, Director
Chicago Medical-Legal Partnership for Children, a program of Legal Council for Health Justice



Sarah Horn, MPA
Americorps Vista, Chicago Medical-Legal Partnership for Children

To: Melina Wright, ESSA Coordinator
Illinois State Board of Education

From: Dr. Brent Clark, Executive Director – Illinois Association of School Administrators
Mr. Roger Eddy, Executive Director – Illinois Association of School Boards
Mr. Jason Leahy – Illinois Principals Association
Dr. Michael Jacoby – Illinois Association of School Business Officials

RE: Proposed ISBE ESSA Draft Plan – Round 1

Date: October 7, 2016

The purpose of this letter is to provide feedback to the first draft of the Illinois Every Student Succeeds Act (“ESSA”) State Plan. Thank you in advance for your time and consideration.

Section 1: Consultation and Coordination

We commend the Illinois State Board of Education (“ISBE”) for its extensive stakeholder involvement and thank you for the chance to provide multiple opportunities for meaningful feedback in the development of the Illinois ESSA State Plan. Our primary request and concern is that Illinois honor the spirit of the federal legislation and provide maximum flexibility to our local school districts and schools in the implementation of ESSA.

ISBE requested feedback as to how funding streams can be combined to support every child as he/she progresses through school. We would respectfully request that ISBE allow local flexibility to the greatest extent possible under the statutory language of ESSA and provide maximum opportunities for districts to receive and spend dollars in order to maximize the success of individual children.

Section 2: Challenging State Academic Standards and Academic Assessments

ISBE requested feedback regarding the assessment(s) to be used in the Illinois ESSA State Plan. Although we continue to support local options, we recognize that the federal law provides that assessments administered must be statewide in nature, and the statewide choice at the K-8 level, based on statutory constraints, is PARCC and the High School choice is SAT. Our members will continue to push for the maximum flexibility that the law provides related to the suite of assessments that school districts and schools could administer. Districts continue to request that they are able to use additional assessments, such as MAP. However, we also will continue to educate our member districts regarding the confines of the current statutory language contained within ESSA. Given the impending expiration of the PARCC contract, we hope moving forward that ISBE will have a pro-active and collaborative statewide approach and alignment of multiple assessments.

Section 3: Accountability, Support and Improvement For Schools

As to the accountability plan, we have been extremely active in sharing our comments and concerns. We cannot stress enough the importance of a multi-measured approach that not only considers a student’s ability on the statewide assessment, but honors the “whole” child, the environment in which the student learns, and the presence of high quality professional practices within school districts. We also firmly believe that any measure which is included in our accountability system should be within the schools’ nexus of control. Schools should not be held responsible for factors over which they have little to no control.

While we deeply appreciate ISBE’s inclusion of multiple examples of stakeholder feedback as to what could be in the accountability plan, we would request that the next draft contain a focused and succinct approach to the indicators and components of the State Accountability Plan that will meet the federal requirements. We would recommend the following for consideration and inclusion in the next draft:

K-8

Required Indicators:

Proficiency
Growth
EL Proficiency

Other Potential Indicators:

IBAM Component 2 (Compliance,
Standards, Contextual Goals)
Chronic Absenteeism (or other Attendance
Marker)
“On Track” Readiness
K-2 Readiness

High School:

Required Indicators:

Proficiency
Graduation Rates
EL Proficiency

Other Potential Indicators

IBAM Component 2 (Compliance,
Standards, Contextual Goals)
Chronic Absenteeism (or other Attendance
Marker)
“On Track” Readiness
Post-Secondary Readiness

We believe that this type of chart would better focus the conversation on what is statutorily allowable under ESSA and elicit meaningful feedback to move the conversations forward in order to answer the harder questions inside each indicator. We believe that the above enumerated “other” indicators are those that have systematic statewide support, are rooted in evidence that drive continuous student improvement and are fair and measureable at the individual district and school level. The only “other” indicator that is yet to be in existence in the state is a K-2 Readiness Indicator. We would like to work with early childhood stakeholders, as well as ISBE, to determine whether this type of readiness indicator is realistic, supported in evidence and meaningful to our districts.¹ We are not absolute with these “other” indicators, but would like to

¹ It is imperative that this not be construed to be the current KIDS assessment. We would be firmly opposed for a multitude of reasons in including said assessment in the state accountability model. There is much concern regarding this assessment and its current use in the schools.

see a more focused and realistic conversation moving forward. However, for many reasons, we feel that some of the “other” indicators that were listed in the draft plan should not be used for accountability purposes. These concerns are detailed in Exhibit A.

We would recommend breaking down each indicator into a very specific list of questions as they relate to the specific indicator. For example, as it relates to the Growth Indicator at the K-8 level, we need to continue to focus the statewide conversation as started with the ISBE ESSA Working Group. We would request ISBE elicit feedback related to individual stakeholder’s guiding principals when considering growth. Once guiding principals are established, the work on this particular indicator would become more detailed and stakeholders would have the opportunity to provide specific comments and concerns. Regarding the measurement of student growth, please find attached, as Exhibit B, the Alliance’s preferred approach. In regards to establishing proficiency standards, graduation rates and EL proficiency, we would like the opportunity to continue collaborative discussions with stakeholders on these important topics. We will provide further input as we continue our internal discussions on these topics and expect to provide more detailed comments and concerns after the release of the next draft.

As it relates to the “other” indicators, we strongly believe in the work that is taking place within the Illinois Balanced Accountability Measure Committee (IBAMC). The IBAMC has recently adopted and recommended to ISBE a Quality Framework containing seven standards and practices that research has proven drives continuous improvement. We believe that this is not only a framework to drive deep continuous improvement work at the district and school level, but could also provide meaningful evidence to drive a targeted system of support in the areas districts and schools need the most. The IBAMC is beginning its work regarding an attendance marker. Our recommendation related to an attendance marker will come after a thorough study and discussion of research-based best practice. We also continue to research student “On-Track” indicators and post-secondary readiness. To the extent possible, the goal of the accountability plan should be to highlight the successes of our students and districts, while recognizing weaknesses and targeting support where needed, instead of being punitive and negative.

In response to the weighting of the indicators, we implore ISBE to follow, to the greatest extent possible based on statutory limitations of ESSA, the spirit of HB 2683 (Public Act 99-0193). We favor including a large portion (as much as determined acceptable by definition after ESSA rule-making) of the new accountability system to continue to come from the “Other” Indicators (now 70% per Public Act 99-0193). Our schools are much more than student performance on assessments. We recognize that ESSA requires the statutory required indicators to be given greater weight than the “other” indicators. If this language is not further defined, we would recommend a 51%/49% split, thereby allowing the greatest percentage possible for “other” indicators while still adhering to the statutory limitations of ESSA.

Regarding Goal Setting, we agree with the Draft comments. While long-term goals can be ambitious, short-term goals must be concise, reasonable and achievable. In all cases, capacity

and resources must be considered. We must balance rigor with realistic expectations. We believe that the long term goals timeline should be six to eight years, while interim goals timeline should be a minimum of three years. We cannot stress enough the importance of appropriate and targeted supports at every level, which we believe are necessary to achieve both long- and short-term goals. We must continue to change the message at the state and local level, especially as we embark on a new funding model; systematic and meaningful change takes time and resources.

Regarding Aggregating Measures, we agree that grades should not be used for differentiation. We fully support avoiding negative terminology when expressing performance levels. We value the opportunity to continue to provide meaningful feedback regarding this. We do not support a compare-and-punish model, but we do support a model that allows for districts and schools to “tell their own story.” Additionally, we support five to six levels of measures with more opportunity for movement along the scale.

Finally, as to ISBE’s request regarding how many years schools with a student group whose performance is on par or lower than the performance of the “all students” group in the lowest-performing 5 percent of schools should have to implement a school improvement plan before it is identified as requiring comprehensive supports and services, we recommend up to four years due to capacity and development time to implement a school improvement plan. As mentioned above, we firmly believe that a good framework for continuous growth, time, and equitable and adequate resources are essential.

Section 4: Supporting Excellent Educators

We support and clearly understand the need for professional learning opportunities for teachers and administrators in order to improve the effectiveness and quality of teachers and principals. In particular, we believe support for principals and school leaders must be a renewed focus of the ESSA State Plan. Valid and reliable research has proven that effective school leadership is second only to direct classroom instruction in raising student achievement, and evidence shows that school leadership has the greatest impact in schools with the greatest need. Over the last decade, the roles of principals and other school leaders have become increasingly complex. Principals are not only operational leaders responsible for establishing a safe and supportive school environment, they are also instructional leaders responsible for providing ongoing coaching and mentoring to teachers and students.

Despite the increased demands placed on principals, state and local efforts around effective recruitment, preparation, and ongoing support have not kept pace. The New Teacher Center recently found that only 20 states offer any kind of induction or mentoring program for new principals, and in just six states does that support continue into the second year. In the states where programs do exist, they are often not funded at a level that would allow all principals to take advantage of them.

In addition, we have and will continue to support efforts to recruit and retain substitute teachers in order to provide more release time for teachers to participate in the aforementioned

professional development opportunities and induction. The substitute shortage is a statewide issue, and will significantly impact the ability for schools and districts to allow release time for teachers to continually learn and grow. We must continue to work through this issue so that the flexibility and increased funding realize their full impact.

We encourage ISBE to consider supporting continued efforts to address the growing needs of school leaders in the areas of professional development, mentoring, recruiting and retaining quality educators, and access to substitute teachers to support teachers' professional development needs.

Section 5: Supporting All Students

We believe that we must maintain flexibility and provide the most comprehensive well-rounded and supportive education for all students. In response to the requested feedback, we agree that it is beneficial for districts to provide student support services. However, there must be reliable, adequate and sustainable funding for these services. Often the expectation of student support services comes without funding and we must change this moving forward.

Conclusion

Thank you for your consideration of the abovementioned. We will continue to provide feedback and engage in the process. We look forward to Draft #2 and the opportunity to continue to collaborate in this very important work.

Exhibit A

Concerns with “Other” Indicators listed in Draft State Plan

- “Academic Indicators”:
 - We have concerns regarding mandating the KIDS assessment for all students. Some schools have experienced success with other assessments and have longitudinal data using another high quality assessment.
 - We caution using Teacher Retention as an Academic Indicator because there are too many variables related to teachers either moving to another school or out of the profession.
 - We support the use of Student Growth Over Time with appropriate time intervals and supports provided. Resources are necessary to support student growth.
- “School Climate”:
 - With the new requirements in SB 100, this could be reported but not an Indicator. Schools need time to adjust to these new requirements and data will not be reliable.
 - We should always consider school capacity and resources for any Indicator
 - We caution against using any components of the 5Essentials Survey as Indicators. Climate surveys can be beneficial but problematic as an Indicator. The specific climate survey used should not be mandated and continue to provide the flexibility allowed under statute.
- “Engagement”:
 - We understand the importance of parent and community engagement, and we support appropriate measures of consistent reporting. We do not support this as an Indicator because it is difficult to measure in an accurate manner.
- “Access to Advanced Coursework”:
 - We support student access to advanced coursework and dual credit at the high school level as an Indicator, but such inclusion must consider capacity and resources.
- “Non-Academic Indicators”:
 - Generally, for all of these, the capacity of districts to provide programs related to the indicator must be considered.

Exhibit B

Purpose

This document summarizes three guiding principles that emerged from the growth model working group. As ISBE chooses how it will measure student growth for school accountability under ESSA, the group believes the final model should satisfy the following three principles:

Guiding Principles

1. Student growth should be uncorrelated to student proficiency.

The group believes that student growth should capture a unique attribute of student performance separate from proficiency. If both proficiency and growth are components of an accountability system, proficiency and growth should provide unique information about the school and the students it serves. ISBE's growth value tables used in the past fail to satisfy this principle as the percentage of students meeting or exceeding standards correlates highly with the growth score produced by the growth value tables. Hence, the student growth measure contains information about student proficiency and does not capture a unique attribute. The group believes this principle is important as it allows lower proficiency schools to demonstrate continuous quality improvement, providing a more equitable accountability system.

2. Student growth should be measured against a standard for growth and should not mathematically prohibit all students and schools from receiving favorable growth scores.

The current proficiency model (percentage of students that meet standards) allows for all students in the state to meet standards. The group believes the same principle should apply to student growth. The model used to calculate student growth should not mathematically prohibit any students in Illinois from receiving high growth scores. The group believes any growth model that produces growth scores where the growth of a student is affected by the growth of a different student during the same time period violates this principle. Consequently, individual student growth ratings should avoid a "zero-sum" property that introduces competitiveness to individual students and aggregate growth ratings.

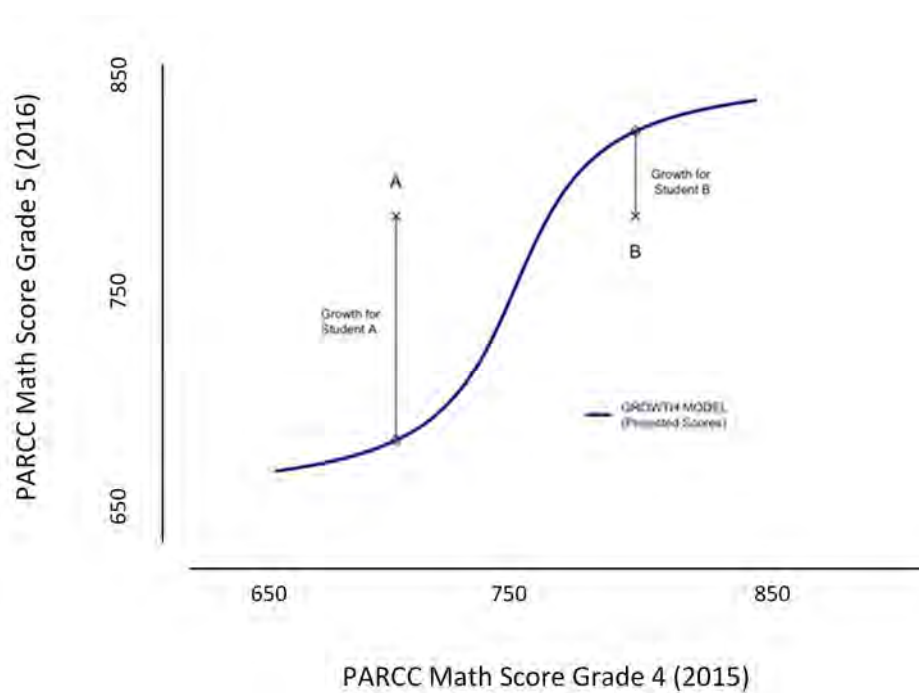
3. The growth model should be transparent and easy to communicate.

Documenting the methodology used to produce growth scores and publishing said methodology publicly in an easily understood format provides the basis for a transparent accountability system. Any methodology used by ISBE to produce growth ratings should be in the public domain.

Preferred Model

A **regression-based conditional status** approach is the only approach under consideration that satisfies all three guiding principles. While many statistical details will need to be decided, the group believes formulating growth as the difference between a student's actual score to their projected score given typical growth and starting point should be the foundation of ISBE's growth model. The following diagram illustrates the approach.

Conditional Status Model for Student Growth



The above graph shows two students with the same Grade 5 PARCC Math score. Student A showed high growth. Student B showed low growth.

The model satisfies principle one. Regression analysis, when properly implemented, ensures growth is uncorrelated to projected values.

The model satisfies principle two. The model would be calibrated on an independent sample of students.

The model satisfies principle three. Regression analysis is public domain. The results can be communicated as a simple lookup table that describes for each starting score the projected amount of growth typical across the state of Illinois.

Early Childhood Comments – ISBE’s First Draft ESSA Implementation Plan

Each year, Metropolitan Family Services reaches 1150 Illinois children ages zero to 5 and their families through our enriching Early Head Start and Head Start programs, employing 150 staff to empower communities throughout the City of Chicago and DuPage County.

As an early childhood grantee in DuPage and delegate agency in Chicago, Metropolitan appreciates the opportunity to provide feedback for the Illinois State Board of Education’s proposed ESSA implementation plan.

Section 1: Consultation and Coordination

Re: Section 1.2. Strategically braid funding streams to best support children’s continuity of learning.

Beginning with early childhood education, it is essential to remove state fiscal and accounting barriers so providers can best consolidate federal, state and local funds to provide the highest quality of educational opportunities while reducing redundancies in services and reporting. Currently, Metropolitan’s Chicago-based programs braid funding from the following sources:

- Chicago Department of Family and Support Services – Head Start and Early Head Start
- Chicago Public Schools – Preschool for All, Home and Center Based Prevention Initiative
- Illinois Department of Human Services – Child Care Assistance Program
- Illinois State Board of Education (federal pass through) – Child and Adult Care Food Program

Metropolitan Family Services looks forward to participating in a continued dialogue around how to most efficiently and effectively blend funding streams to better meet children’s education needs (for example: in Chicago, blend Head Start and Preschool for All funds to provide a full day of learning, allocating Child Care Assistance Program funds to deliver supplemental services).

Section 2: Challenging State Academic Standards and Academic Assessments

Re: Section. 2.2. Clearly define English Language Proficiency (ELP), indicators and supports needed.

As a provider serving communities with a high concentration of dual language learners, we strongly recommend adoption of specific English Language Proficiency supports.

- Dissemination of widely accepted English Language Proficiency guidelines – including age-specific definitions and key performance indicators that align early childhood and grades K-12 (WIDA is one resource).
- Comprehensive support plan for children who do not achieve age-specific benchmarks, inclusive of family and community engagement strategies.
- Tracking and supports for students through high school, following exit from English Language support services.

Section 3: Accountability, Support, and Improvement for Schools

Re: Section 3.1. Select a PreK-2 indicator that is reflective of key social emotional learning needs.

An appropriate and meaningful PreK-2 student success / school quality indicator must take into consideration the full range of children’s social emotional learning needs, including family and community support factors. Metropolitan looks forward to collaborating with stakeholders through the Early Learning Council to provide additional consultation and feedback on this subject.

Section 4: Supporting Excellent Educators

Re: Section. 4.2. Reinstate funding and extend timeline for receipt of specific teaching certifications.

Non-profit providers like Metropolitan Family Services struggle to recruit and retain a qualified workforce with the required early childhood teaching credentials, namely the 1) Professional Educator License, 2) Spanish Language Certification, and 3) English as a Second Language (ESL) Endorsement. Having invested in extensive workforce training and development, we consistently lose qualified staff to Local Education Agencies, which can afford to pay higher salaries for similar positions. We propose the following possible solution:

- Allow organizations to hire qualified teaching staff, with an 18-month grace period for receipt of required certifications.
- Reinstate funded cohorts for qualified education professionals pursuing advanced certifications.

Section 5: Supporting All Students

Re: Section. 5.1. Strengthen implementation of existing Social Emotional Learning (SEL) standards.

As an alternative to punitive measures that remove children from the classroom, we recommend that school districts re-examine methods for incorporating existing SEL standards into classroom learning. Incorporation of diverse SEL factors in grades K-12 contributes to a smooth transition for students from early learning settings – where providers integrate classroom learning with a full range of family and community engagement strategies, including medical and mental health referrals, nutrition services, family counseling and special education. In particular:

- School districts should track specific school quality indicators that align with statewide SEL standards, incorporating appropriate school quality improvement measures as needed.
- School districts can build capacity by partnering with organizations that provide a range of services addressing non-academic barriers to success, including the evidenced-based 21st Century Community Learning Centers model.

In Conclusion

Metropolitan Family Services recognizes the complexity involved in consolidating diverse stakeholder input into a plan that effectively addresses the comprehensive needs and disparities in learning experienced by children in communities across Illinois. We look forward to continuing to partner with ISBE to implement strategies that provide the best education opportunities for each and every child in our state.

Contact: Director of Government Affairs Taneka Jennings at jenningt@metrofamily.org or 312-986-4227.



Olympia Community Unit School District No. 16

Dr. Ed Jodlowski ♦ Olympia High School Principal

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October 6, 2016

Dear Illinois State Board of Education –

This letter serves as my official response to the Illinois Draft ESSA plan. I have enthusiastically served as an educator in the state of Illinois for the last twenty seven years. I have had the opportunity to work for three uniquely different school districts located in the heart of central Illinois. In those years, I have seen the state of Illinois react and implement changes based on federally mandated guidelines. I completely understand that it is necessary for the state to be in full compliance with these guidelines, but often times the way it is mandated is not necessarily in the best interest of our students. I work specifically with high school students – students whose next step is college and career – my concerns about this ESSA Draft are all related to the implications for these individuals.

When looking at the accountability aspect, ESSA says that 51% of student growth has to be on academic indicators (test scores). However, at the high school level we have not had a consistent test given in the last three years. We have moved from the PSAE to ACT to PARCC and now to the SAT. Our high school students don't get timely results either on these tests as well which is another reason why 51% use of this academic indicator is problematic. Teachers at the high school level do the best to teach the skills from these assessments, but they are not as clearly aligned with the state standards as many of the assessments that are constructed by schools themselves. And now, applying such a large percentage towards student growth only complicates these measures for both students and teachers especially when there is a current Balanced Accountability Model that has been established through PA 99-193.

Secondly, as I examine the indicators of College and Career readiness I note that the state board of education has not taken some important elements into consideration. One of those elements is the GPA of 2.8 on a 4.0 scale. It seems that ISBE does not understand that GPA looks different in every school district in the state. There is not one mandated grading scale so a student who earns an A in one school at 92% could transfer to our school where an A is 94%. Also, our school is currently developing a skills based system for reporting achievement at the high school level, and while that system will be converted into a GPA, it will reflect a different readiness level than what the state board is considering. ISBE needs to recognize that there are additional ways to denote readiness such as dual credit enrollment and achievement; Advanced Placement enrollment and achievement; Student Attendance; Student Involvement in Community Service and Co-Curricular Activities. Schools, especially high schools, are working to build the most rounded students possible and that goes beyond a set GPA and score on a test.

Finally, ISBE must recognize the timeline of such an endeavor. There is a need to make long term goals at least five years especially since change research shows that it takes three to five years for systemic change to take hold. Also, examining the latest research trends that come from the business industry shows that students must exit high school with strong characteristics such as responsibility, respect, perseverance, collaboration, and self-advocacy. Without these skills, students cannot be prepared to exist in future careers. Thus, the ISBE needs to reflect in their timeline work with outside agencies that will be impacted by our future workers. This

also can only be done in schools if ISBE honors the intent of ESSA and provides Title IV dollars to school districts can support the needs of their students individually. Again, time and resources are critical to ESSA's success.

I hope that you will take the time to recognize that there are components outlined in this draft that need some considerations. Please take the time to consider the needs not only of those students who I will encounter in my high school, but all the students in the state of Illinois. For too long, the students of Illinois have had to suffer from the manacles that bind us with these federal guidelines. With careful, research-based planning, the students of Illinois can benefit, but that will require careful consideration from ISBE regarding the ESSA draft.

Sincerely,



Dr. Ed Jodlowski
Olympia High School Principal



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To whom it may concern;

I am writing to you regarding the proposed ISBE guidelines for the implementation of ESSA. As a building principal I would like to share my thoughts with you as these guidelines will dictate the future education of our students. After reviewing the proposed guidelines there are five areas that I would like to bring to your attention; accountability, College and Career Readiness measures, methods to set goals for the state and individual districts, future economic skills, and the new Title IV Block Grant.

I cannot disagree that accountability is important, however I urge you not to take away local control of accountability. ESSA requires 51% of student growth to be measured on academic indicators, please allow local districts to measure accountability past the 51%. Illinois currently has a law, PA 99-193 the Balanced Accountability Model that sets the parameters for accountability, there is no need for additional guidelines or legislation.

I would also like you to consider supporting the Indicators of College and Career Readiness. While the College and Career Readiness Indicators provide a broad look at a student's achievement I would urge you to reconsider the GPA requirements. Many districts including ours are moving away from the a GPA and the emphasis on grades and are focusing on the achievement of skills and learning. The GPA requirement can hinder this process as well as create inequality as each district measures GPA differently. While the College and Career Readiness Indicators provide good data about our students, they do not tell the whole story. Please consider adding accountability for the soft skills, social intellect and emotional intellect as well that we know are imperative to a student's success.

Additionally, please consider making long term goals that extend at least five years out. For systemic change to take hold, research indicates plans must be in place at least 3-5 years. Lastly, I would ask ISBE to honor the intent of ESSA and funnel Title IV dollars to school districts so Districts can locally support and enrich students.

Thank you for your consideration of my request, I feel very passionately about the guidelines and implementation of ESSA.

Sincerely,

Lisa A. Castleman
Principal, Olympia West Elementary

October 6, 2016

Illinois State Board of Education
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Springfield, IL 62777
essa@isbe.net

RE: Comments on the first draft of ISBE's ESSA State Plan

To Whom It May Concern:

With our mission of giving children in poverty the best chance for success in school and in life, the Ounce of Prevention Fund ("the Ounce") advocates for and provides the highest quality care and education for children from birth to age five. Thousands of infants, toddlers, and preschoolers are reached each year through our programs, training, evaluation, and advocacy efforts.

The Ounce believes that high-quality early learning opportunities, beginning at birth, must continue to be an essential part of our nation's education system. As such, we appreciate the opportunity to offer feedback on the first draft of the Every Student Succeeds Act (ESSA) Illinois State Plan. The new law includes a number of important early learning provisions and references designed to encourage and enable states and school districts to strengthen connections between early learning and K-12. The development of the ISBE state plan presents an opportunity to maximize the impact of these early learning provisions on student outcomes in Illinois.

Our comments are organized by section below.

Section 1.1 Timely and Meaningful Consultation

- Under 1.1A.i (page 3), we ask that the summary of ISBE's ESSA "listening tour" meetings reflects the participation of the early learning community.

Section 1.2 Coordination

- Under 1.2A (page 5), ESSA requires states to describe how they will assist districts and schools that use Title I funds to support early childhood education programs in their state plans. The Illinois Early Learning Council is taking up this issue, and we will be supporting the Council as it prepares recommendations to ISBE in this important area.
- Under 1.2A.v (page 5), we suggest the following edit: "the Child Care and Development Block Grant Act of ~~1990~~ 2014;"
- Under 1.2A (page 5-6), we are glad to see ISBE soliciting ideas from stakeholders regarding how funding streams can be combined to better serve young children and their families. ESSA provides a great opportunity for the agency to coordinate the funding and administration between different federal programs in order to support children as they progress through school. Those involved with the state's early learning system have decades of experience coordinating and administering state and federal programs. The braiding and blending of funds is often quite complex, and when done improperly it can create barriers

for families trying access high-quality programs. Because early learning providers and system leaders know the benefits (and pitfalls) of combining the funding and administration of distinct early childhood programs first hand, we urge ISBE to consult with the [Illinois Early Learning Council](#) if and when the agency discusses future blending and/or braiding opportunities.

- Under 1.2A.vi (page 5-6), we suggest including examples of ways in which the state's early learning system is working to integrate Head Start. For one, preschool programs are required by law to coordinate with local Head Start providers ([105 ILCS 5/2-3.71\(4.5\)](#)). And as noted in its "[Early Childhood Care and Education Position Statement](#)," ISBE urges collaboration "with families, community organizations, child care organizations, Head Start and other state agencies to meet the physical, mental, social and emotional needs of young children, including their physical care and protection; share resources, services and accountability." This is especially true for grantees of Preschool Expansion Grant funding, where building working partnerships with Head Start is required and monitored. Another case is the [Illinois Early Childhood Asset Map](#) (IECAM), an online resource that provides data on early childhood services and the demographics of young children and their families, which features data from programs funded by the Early Childhood Block Grant and those funded by Head Start.
- Under 1.2A.vii (page 5-6), we suggest including examples of ways in which ISBE-funded early childhood programs interact with programs funded by the Child Care Assistance Program (CCAP). The state, for instance, [allows the blending](#) of ECBG funding with Child Care Assistance Program (CCAP) funding; the purpose is to facilitate collaboration between child care and other early childhood programs to increase the quality, continuity, and quantity of higher-quality early care and education for families who are working and/or participating in approved training/education programs. Children served in high-quality, full-workday, full-year, blended Early Head Start, Head Start, state preschool, and Prevention Initiative (PI) infant/toddler programs receive a child care subsidy for the program year to encourage continuity of service.
- Under 1.2A.viii (page 5-6), we suggest highlighting the Education Sciences Reform Act of 2002 (ESRA), the federal law that authorizes the Statewide Longitudinal Data Systems grant. Funds from LDS have been used in Illinois to build out the state's early childhood data systems, including efforts to incorporate infants and toddlers into the longitudinal data system. Illinois is seen as a national leader in this area.

Section 2.1 Challenging State Academic Standards

- Under 2.1 (page 6), students in Illinois, according to the Early Childhood Education Mandate for bilingual education, are identified as English Learners (ELs) upon entering the school system. Parents fill out a home language survey and early childhood students are assessed to determine their placement and required services to ensure academic success. Screening early childhood students in their primary language is not mandated by ESSA; however, it is best practice in early education. Illinois should maintain the current practice of identifying ELs early and providing quality early childhood education that matches a child's cultural and linguistic needs. It is vital to consider native language screening and assessment in early

childhood settings; teachers will not capture a full understanding of a student's knowledge and skills if they only assess children in the language in which they are least proficient.

Section 2.2 Academic Assessments

- Under 2.2A.iv (page 8-10), we suggest that data on student progress and achievement be disaggregated by the number of years a student has been in an EL program. Additionally, we recommend that ISBE consider ongoing tracking of ELs' academic achievement beyond the point in time the student is considered English language proficient. Lastly, ISBE should consider including native language proficiency in their assessments in order to further promote sustained bilingualism and biliteracy.
- Under 2.2F (page 12-13), we believe that in addition to providing assessments in other languages, it is important that ISBE also ensure staff able to adequately support a student in his/her native language is present to provide the necessary guidance and support prior to and during administration of assessments. Communication of such assessments, which includes background information and methodology, should also be made available to the student's family in their native language. Engaging families in their child's education will enhance the student's academic and developmental experience.
- Under 2.2G (page 13), we suggest the following edits: "Illinois will continue to support the design, development, and implementation of high quality and evidence-based assessments that are developmentally appropriate, culturally and linguistically competent, and aligned to the ILS."

Section 3.1 Accountability System

We are grateful that ISBE's discussion of the state's accountability system includes a recognition of the importance of the early years – both the K-2 years and preschool. We have spent a great deal of effort on exploring the possibilities of accountability in those years through a series of papers: *A Framework for Rethinking State Education Accountability and Support from Birth through High School* (2014), *Changing the Metrics of Turnaround to Encourage Early Learning Strategies* (2014), *Valuing the Early Years in State Accountability Systems Under the Every Student Succeeds Act* (2016), and *Uses and Misuses of Kindergarten Readiness Assessments* (forthcoming). Our comments here draw on that work, and we hope to partner with ISBE in the development of an accountability system that uses appropriate metrics to put meaningful weight on the early years.

Overview

The years prior to third grade are incredibly important developmentally, but historically Illinois' accountability system has ignored those years – largely because No Child Left Behind (NCLB) pushed the state to focus on the tested grades of third grade and up. Under the ESSA assessment, results will continue to be the predominant indicator of school success, but Section 1111(c)(4)(B)(v) of the law requires states to utilize an "indicator of school quality or student success" beyond assessment results. The use of this (B)(v) indicator presents a valuable opportunity for Illinois to fundamentally change how its accountability system drives local action relating to the early elementary and pre-kindergarten years.

When assessment results in third grade and up are the only metric on which a school is judged, it creates a strong incentive for district and school leaders to focus on the “tested years.” There are more than four years between the day a child enters a 4-year-old preschool program and the day that child takes his or her first accountability assessment – longer than the tenure of the average superintendent or principal. In the context of a low-performing or turnaround school, four years has often been too long to wait to show results. Moreover, many low-performing schools have high student mobility – meaning that only about half of the children receiving pre-kindergarten education in a district could be expected to stay long enough to take accountability assessments in that same district.

Taken together, these factors put pressure on local leaders to focus on the tested years – the years that mattered most to their metrics. The new (B)(v) metric provides an opportunity to shift the balance by using additional indicators that place emphasis on the early years, which will encourage local action to improve opportunities in those years. Assessment results will remain a central focus of Illinois’ accountability systems under the ESSA, but the opportunity to use (B)(v) as a counterweight is critical to the development of early learning systems and efforts to raise quality in the early elementary grades. Doing so aligns strongly to ISBE’s goal of having 90% or more students reading at or above grade level by third grade.

One potential strategy for states interested in strengthening the focus on the early years is to choose (B)(v) indicators that can be collected for any grade (such as chronic absenteeism) and then disaggregate the data by grade. For example, if Illinois chose a single (B)(v) indicator that would count for 20% of an elementary school’s rating, it could decide that each year in a K-5 school would count as 4% of the school’s overall rating – meaning that the K-2 years would represent 12% of the school’s total rating.

Illinois could even choose to put additional weight on the K-2 years, which might be particularly important if Illinois places a heavy emphasis on growth in assessment scores. Using growth scores without having a counterweight for K-2 quality could give districts an incentive to have students coming into third grade at lower levels of performance; while we have faith that Illinois superintendents would not intentionally undermine K-2 performance to “game the system,” we think it would send the wrong message for the state to set up an accountability system that potentially rewarded that behavior. We greatly appreciate that ISBE’s draft included a recognition of the importance of putting meaningful weight on those early years.

A complementary and even more ambitious approach is one used in many early learning rating systems: conducting external reviews of teaching and learning, including of the quality of schoolwide systems supporting quality instruction. In early childhood the CLASS is a tool in widespread use for this approach, which is reflected at the K-12 level in voluntary accreditation processes that some schools undertake. This approach could have numerous benefits if applied to K-12 schools through the (B)(v) indicator, including generating much more actionable feedback for local leaders seeking to improve school quality. These measurements can also be used appropriately for all grade levels, not just third grade and up – providing an opportunity to create real accountability in the K-2 years.

The ESSA rules do not and should not mandate that Illinois use the (B)(v) indicator to place emphasis on the early years. It is important to understand, however, that the (B)(v) indicator presents an

opportunity for Illinois to remove a significant disincentive to early learning presented by its previous accountability systems.

Specific Recommendations

Weighting of Indicators

As suggested above, we recommend that the early years be given significant weight in the state's accountability formula. This does not necessarily require the creation of a standalone K-2 indicator; instead, the state could disaggregate its (B)(v) indicators by grade level. For example, if the state determined that chronic absenteeism was going to count for 20% of a school's overall score, it could require that chronic absenteeism in each of the K-2 years count for 4% of the school's overall score – and then the remaining 8% could be divided equally among the school's remaining grades. This approach would ensure that at least 12% of the school's accountability rating would be focused on the K-2 years – which would reward administrators for efforts to improve outcomes in those years.

This disaggregation approach could also work in concert with a standalone K-2 indicator developed at some point in the future. In the short term, however, this approach is the one most likely to place a specific focus on the early years. We acknowledge that not all potential (B)(v) indicators would work with this approach, as some of the indicators proposed – such as high school curricular measures or 8th and 9th grade on track data – would not be collected in K-2.

We strongly recommend that ISBE include in its (B)(v) indicators at least one indicator that can be collected for every grade and disaggregated, and that the specific weight assigned to indicators in the K-2 years represent at least 10% of an elementary school's overall score.

Selection of Indicators

We appreciate that ISBE has worked with its Accountability Workgroup to develop some proposed indicators for public consideration. Our comments here will focus on three specific issues: (1) the indicator included in the ISBE draft that we think is most promising for immediate use in the state's accountability system; (2) the development of a standalone K-2 indicator under (B)(v), a possibility raised in ISBE's draft; and (3) data to be included in the state's reporting system but not its accountability framework.

(1) Potential (B)(v) Indicators Included in the ISBE Draft

As discussed above, we believe it is important for ISBE to include at least one (B)(v) indicator that can be measured across all grade spans. We also believe that it is essential that the indicators be ones where activities by school leaders have the power to change performance on the metric; we want district and school administrators to see a clear line between tangible action on their part and improvement in the state's accountability system. We also believe that it is important for the indicators to represent areas where there would be general agreement that improvement in that area makes for a better school.

By those standards, we believe that ***chronic absenteeism*** is a strong metric for a variety of reasons:

- It is objectively measurable for every grade level.

- There are specific strategies district and school leaders can use to improve performance in this area – and in doing so, they will connect more closely with parents and primary caregivers, which is positive.
- Intuitively it makes sense to parents, caregivers, and policymakers that all other things being equal, a school with lower chronic absenteeism is better than a school with higher chronic absenteeism; rigorous research evidence supports this notion.

Importantly, chronic absenteeism in the earlier years has been shown to correlate with chronic absenteeism in later years – meaning that data about K-2 chronic absenteeism is not only an important indicator for district and school leaders to use in measuring success in those grades, but that improving performance in that area has potentially meaningful long-term effects.

Of the indicators repeatedly identified by the Accountability Workgroup, chronic absenteeism is the only one that could be collected throughout K-12. We support its inclusion as an accountability indicator, particularly if it is disaggregated by grade as described above.

(2) Potential (B)(v) K-2 Indicator

The ISBE draft raises the possibility of developing a specifically designed PreK-2 indicator for eventual inclusion in the accountability formula. We support the concept of a PreK-2 indicator, and also agree with ISBE's suggestion that the development of this indicator be put on a separate timeline from other indicators. To thoughtfully develop this indicator will require working with the P-20 Council, the Early Learning Council, and other stakeholders; we do not believe this process could be completed before the March submission deadline.

If ISBE launches an effort to develop a K-2 indicator, we would strongly recommend that it draw on the expertise and research used to develop the state's ExceleRate system for rating early childhood programs. The K-2 indicator would represent a specific judgment of what constitutes an excellent education in those years; the ExceleRate system represents the state's judgment on what constitutes an excellent education in the years preceding K-2. Ideally the K-2 indicator will represent a melding of the best thinking of ExceleRate with the best thinking of ISBE's (B)(v) indicators for the entire K-12 system, so that the accountability expectations for the K-2 years fit neatly into a cohesive progression from birth through high school graduation.

The Ounce's accountability recommendations have also emphasized the benefits of school rating systems that use trained outside observers to rate the quality of teaching and leadership in schools. This indicator has the advantage of measuring the adult behaviors that matter most to improving child outcomes in a valid and reliable way, and also provides concrete, actionable feedback to school leaders and teachers. We recognize that there are burdens that come with a system of this kind, but believe that those can be more than offset by the benefits of the changes to professional practice that can be supported through this approach. As described above, this indicator is a critical complement to indicators that emphasize growth in assessment scores; it will help to ensure that Illinois' accountability system incentivizes the highest quality education in all grades.

(3) Reporting System Indicators

a. KIDS

We are grateful for ISBE's efforts to roll out KIDS. KIDS is an excellent example of data that ISBE should report, but should not be included in the accountability system (as requested on page 21). The data from KIDS – and other kindergarten assessments -- does provide meaningful insights into the status of children at a school and in a community, which can help inform decisions about resource allocation and professional practice. While it is not appropriate to use that data for school accountability purposes, it is important to report aggregated data publicly to inform action at the state, district, and building level.

There reasons for not including KIDS in the accountability system are as follows:

- Assessments should only be used for the purpose for which they were designed, and KIDS was not designed for accountability purposes.
- The implementation of KIDS is not designed to produce data that would be reliable for accountability purposes. Among other problems, the inter-rater reliability systems necessary to use any adult-reported assessment for accountability purposes would be enormously expensive and difficult to develop and maintain. And in this case using the data for school accountability would mean the teachers administering the assessment and their colleagues would be directly impacted by the results, which could significantly bias the data collection process. This problem is common across any teacher-reported measure of students' skills and development at any grade level (e.g. measures of social-emotional learning) —such tools should never be used for accountability purposes.
- Even if a kindergarten-aged assessment could produce reliable data, it would not really measure the quality of the school. KIDS provides some insights into where children are developmentally when they enter elementary school, but attributing that to the school itself is not appropriate given how little time the children have spent there when the assessment is administered.

b. Other potential indicators

We also recommend that ISBE include **student-teacher ratios** and **class size** in its reporting system, but not in the accountability system. The research evidence is clear that low student-teacher ratios and small class sizes are important components of high-quality education, particularly in the early years. These indicators would be easily incorporated into the reporting system because they can be objectively measured at every grade level (K-12) and are already universally documented. Importantly, because these indicators are so closely tied to funding and other factors outside of the school or districts' control, we do not recommend that these indicators be included in the accountability system.

We also recommend that ISBE develop links between its reporting system and the Illinois Early Childhood Services Dashboard being developed by the Illinois Early Childhood Asset Map (IECAM). This dashboard – expected to come on line in FY 2017 -- will provide key data points about the early learning system, which where possible will be sortable by school district. Connecting this dashboard

and the ISBE-funded Asset Map to the K-12 report card will make it easier for stakeholders to find relevant information about the full birth-to-college education spectrum.

Finally, some suggestions for the list of possible indicators suggested by the Accountability Workgroup:

- Under 3.1 (page 15), we suggest the following edit to the School Climate section: “11. Disciplinary Data: Suspensions and expulsions, referrals to law enforcement, and the use of aversive behavioral interventions.”
 - Under 3.1 (page 15), we suggest the following edit to the School Climate section: “12. Safe environments, including incidences of violence, bullying, and harassment.”
 - Under 3.1 (page 19), the draft plan mentions that more research is needed for the English language proficiency indicators. The same should be said for social-emotional indicators and indicators measuring non-cognitive skills. Guidance around the emerging area of measuring non-cognitive skills is important, as interpretations of behavior [may be subjective](#) and measurements of these skills are only now being reviewed within the context of [race and social-economic status](#).
- c. Utilizing the reporting system

In addition to the use of visuals and strength-based language, communication to primary caregivers about the accountability system and other indicators should be made available orally through public meetings offered by school personnel during hours that are accessible and meet the needs of parents/primary caregivers, and/or through online outlets like a webinar recording that can be voluntarily accessed by parents/primary caregivers at any given time. Communication should be timely and include information about the overall accountability system and also drill down to the school's specific outcomes. Families should receive descriptions of each of the categories that make up the school's rating and the additional indicators, to provide a more complete picture of school performance than a single summative score. Communication should also include achievement growth made among all students and within subgroups, not only absolute achievement. In addition, personnel who are fluent in top non-English languages spoken at school should be made available for translation and interpretation services and to answer any questions or concerns during communications. Community partnerships which can support school's efforts to provide multilingual communication with primary caregivers and families should be part of diligent effort to meet families' diverse language needs (including sign language), if school does not have appropriate staff in place.”

Conclusion

Historically Illinois' accountability system has ignored the years prior to third grade – largely because NCLB pushed the state to focus on the tested grades. However, ESSA's (B)(v) “indicator of school quality or student success” presents a new and important opportunity for Illinois to remove a significant disincentive to early learning presented by previous accountability systems. To do so, we urge the state to: (1) include at least one (B)(v) indicator—chronic absenteeism—that can be measured across all grade spans; (2) weight indicators in the K-2 years to represent at least 10% of an elementary school's overall score; and (3) include other indicators in the reporting system that are relevant to the quality of education in the early years—specifically, KIDS, student-teacher ratios, class size, and IECAM Dashboard data.

It will be critical to conduct a rigorous evaluation of the implementation and impact of Illinois' new accountability system to support continuous system improvement. Freed from NCLB's prescriptive focus, ESSA presents us with a unique opportunity to learn more about what works best in school accountability and improvement. Illinois is well-positioned to contribute to --and benefit from --this important line of research, and should commit to doing so. We appreciate that ISBE has indicated a willingness to learn as we go in this developing policy area, and we fully support the notion that we should study the impacts of accountability policy over time and make adjustments based on what we are learning.

Section 3.2 Identification of Schools

3.2A Comprehensive Support and Improvement Schools (page 22)

We agree with ISBE that the identification of schools for support should be based on the entirety of the state's accountability system, not just test scores. Unfortunately, the federal government in its proposed ESSA accountability rules has indicated that states should only use test scores to identify schools for improvement (§200.18(d) – Differentiation of School Performance). We commented to the Department of Education that we disagree with this provision, and we hope that the final federal rules will allow ISBE to use its entire accountability system in identifying schools for improvement.

We also have expressed our objection to the federal proposed rules governing the exit criteria for school turnaround. School improvement fund awards are limited to four years under §200.24(c)(2)(iii), potentially including a planning year. This means that even if a school implemented a new preschool program for 4-year-olds in the first year of a grant, the children attending that preschool program would only be in second grade in the final year of the grant – too young to take accountability tests. But for a school to exit continuous improvement, the rules require that it show improvement on “student outcomes” under §200.21(f). In other words, the improvement fund strategy that might end up having the most powerful impact on a school's long-term trajectory is mathematically incapable of helping the school exit improvement status within the grant period. This combination of rules dramatically reduces the likelihood of any school using improvement funds to support early education or of demonstrating successful use of the funds if they do.

We have asked the federal government to amend §200.21(f) to allow exit from designation based on measures other than (or in addition to) scores in tested grades and subjects. The inclusion of school quality indicators—in addition to test scores—in exit criteria is instrumental in (1) incentivizing and supporting schools to improve student outcomes by investing in early learning strategies and improving the quality of education, and (2) ensuring that schools are not able to exit the lowest-performing designation via means that are not in line with ISBE's mission, vision, and goals. We hope that ISBE will be able to create exit criteria for improvement grants that encourages schools to invest in early learning strategies, but at this time it appears the federal government will not allow ISBE to do so. We hope that ISBE will work with stakeholders to develop potential exit criteria that encourage early investment, so that if the final federal regulations are more permissive then ISBE is poised to act.

Regardless of whether the federal government changes its approach, we appreciate that ISBE's description of the multi-tiered system of support in 3.2.A.i (page 21-22) recognizes the importance of meeting the needs of students. We recommend building on the existing language with the following suggested change: “An MTSS is grounded upon a framework for continuous improvement that is systemic, prevention-focused, and data-informed, thus providing a coherent continuum of supports

responsive to meet the needs of all learners. ISBE will utilize its MTSS for training, coaching, and technical assistance in order to build districts' capacity to deliver MTSS within all of its schools. In doing so, districts will be able to address the holistic needs of students through evidence-based, developmentally appropriate, and culturally and linguistically competent practices that have been demonstrated to improve outcomes for all students."

Section 3.3 State Support and Improvement for Low-performing Schools

3.3A Allocation of School Improvement Resources (page 27)

Federal law requires that when ISBE distributes school improvement funds it must prioritize districts that "demonstrate the greatest need for such funds." One of ISBE's key questions in this area is how the state should define "greatest need." One factor we would recommend including is data on gaps in early childhood service to children at risk of school failure, which can be identified through IECAM. The data tracked through IECAM allows communities and school districts to determine the level of unmet need in early childhood, and in distributing early childhood funding ISBE has indicated that it will use that data to prioritize the communities that need it most. The need in early childhood is certainly not the only factor that should be considered in determining overall K-12 need, but it should be one factor – because communities with significant shortfalls in early learning service are likely to have persistent performance issues in K-12, which early learning investment can help address.¹ The fact that the state has data readily available through IECAM should make it relatively easy to include this factor in the overall formula.

Relatedly, ISBE's rubric to determine the quality of a district's plan should include considering the quality of the district's efforts to engage its early learning community and ensure that children are entering kindergarten ready. In the process of seeking school improvement funds districts should get credit for having administered strong preschool programs and/or committing local funds to early learning investment, which increases the likelihood of long-term improvement in school performance. School districts can demonstrate a commitment to early learning without a significant outlay of their own dollars: strong coordination with local Head Start and private early learning providers is another practice for which districts should get credit. Strategies school districts can use are discussed in more detail in *An Early Learning User's Guide for Illinois School Boards* (a joint publication of the Ounce and the Illinois Association of School Boards).

In sum, district need for and commitment to early learning should be a meaningful factor in the process of distributing school improvement funds. We are not arguing that it should be the predominant factor, only that it should be a part of the calculus significant enough that districts will pay attention.

In addition, ISBE includes "the quality of the plan itself and readiness of the schools and districts to implement an effective plan" as stakeholder-identified criteria used to allocate improvement funds. We agree that school and community capacity to spend funds effectively and efficiently is an important concern, and we see ESSA as a mechanism to bolster this local capacity-building. In early childhood, ISBE is working closely with outside stakeholders on the issue of support for districts applying for funds; as a funder, ISBE can appropriately provide generalized supports like bidder's conferences, but cannot appropriately provide deep-dive support to applicants for competitive

¹ Because Head Start and state preschool are support by grants rather than through the state's funding formula, the scope of need in early childhood may differ from the scope of need in K-12.

funds. This is an area where outside partners need to be engaged to support capacity-building efforts in communities with significant needs, so that the schools in those communities can demonstrate readiness to use school improvement funds effectively. The valuable stakeholder engagement work ISBE has done on the early childhood block grant might be a model for how it approaches the distribution of school improvement funds.

3.3B *Evidence-Based Interventions (page 30)*

We support ISBE's proposal that schools requiring supports engage in a planning year, which can provide an opportunity to design a birth-through-high-school improvement plan that builds thoughtfully on resources in the school and the community. Some potential strategies for interventions that address the developmentally-important early years include:

- Quantifying the kindergarten entry gap. In many low-performing elementary schools, children are entering kindergarten already far behind. Using KIDS and other developmentally-appropriate assessments to measure where children are at kindergarten entry can provide useful information to inform resource allocation across the birth-to-third-grade spectrum.
- Partner with community providers to expand access to early learning opportunities and improve quality. This can include aligning curriculum and assessments, developing joint professional development, engaging families, and transition planning.
- Opening additional school-based preschool classrooms.
- Strengthen the technical assistance and professional development provider workforce to ensure that they (1) have expertise in early childhood development as well as early learning best practices, policies, and systems and (2) have the capacity and preparation to support improvements in early learning as well as in later grades.

The *Early Learning User's Guide for Illinois School Boards* provides additional detail on how districts might implement these strategies. We know that ISBE is seeking district flexibility, so we are not recommending that any of these strategies be required. However, we do believe that the school-level needs assessment should be required to include an assessment of the needs of children at kindergarten entry, and an assessment of the resources available to families with pre-kindergarten aged children in the school's attendance area.

3.3C *More Rigorous Interventions (page 31)*

We note that there are early learning interventions that could meet the high standards or rigor discussed in 3.3(C) if implemented appropriately for the right populations.

3.3D *Periodic Resource Allocation Review (page 32)*

We encourage ISBE to include in the allocation review data from IECAM on the availability of publicly-funded early learning in different communities. This data is readily available and will help ISBE provide a fuller picture the resources and needs in each school district.

In addition, evidence shows that more disadvantaged and at-risk students tend to be concentrated in lower quality schools. Thus, we recognize there will likely be "gaps" in the technical assistance,

professional development, and other supports and services needed and—as a result of the proposed system to target supports to the lowest-performing schools—provided. That is, Illinois will likely need to provide more support to schools and districts serving more at-risk and disadvantaged populations; using an equity lens, this is an appropriate strategy.

Section 4.1 Systems of Educator Development, Retention, and Advancement

- Under 4.1A (page 33-35), ISBE promises to ensure that the professional development of LEAs offered to their teachers and instructional staff is consistent with the definition of “professional development” by aligning the process of auditing approved PD providers with the definition of PD, establishing an annual PD audit, and communicating the definition to LEAs in guidance. We believe that early learning should be included in the professional development alignment as well as the annual professional development audit. Specific training in early childhood is one of the best predictors of effective early childhood instruction.
- Under 4.1A (page 34), the state plan calls for a description of “the state’s system to ensure adequate preparation of new educators, particularly for low-income and minority students.” The plan should make clear how within the category of minority students, the educator preparation system will meet needs of both race/ethnicity and language for English Learners. In working to meet these needs, a targeted investment could be made in efforts that will work towards the linguistic and racial/ethnic diversification of the teaching workforce.

There are some specific practices that can be taken within the existing system to meet the needs of students of color and of those who are low-income. For example, the education sector should look to form partnerships to establish sector-based workforce development programs that are offered in minority and low-income communities – like within the nursing and manufacturing sectors. Such programs would create a pipeline for there to be increased diversification moving through the education career pathway. Preparation programs need to be accessible to non-traditional students who may not be able to enroll as full-time students, have limited transportation, and/or have varied work schedules if currently employed. Additionally, programs should be equipped with sufficient supports that will adequately orient and guide individuals through their preparation program and the state licensing and certification system.

Currently, the State places teacher candidates in diverse student teaching settings. However, this should not be limited to the teaching candidate. Upon certification and licensing, the state should invest in a system that incentivizes already-certified and licensed teachers to hold stable, non-temporary, or short-term contracts in low-income and minority communities. Furthermore, there should be specific focus on recruitment of experienced teachers, so that these schools in these communities are not inequitably left with staff that has relatively little to no experience.

In addition to recruitment, hiring, and development of a workforce pipeline to diversify the current workforce, meeting the needs of low-income students and students of color also includes adequate preparation and professional training. Such preparation coursework and

ongoing professional development opportunities should include focus areas of cultural competency, cultural responsiveness, and anti-bias approaches. Trainings on implicit biases associated with race/ethnicity, ability, and national origin/immigration should be provided to instructional and administrative staff. Doing so would help diminish and address those implicit biases which have been shown to impact teachers' expectations of students and the engagement of their parents/families, perceptions of student and parent behaviors, and students' own perceptions and beliefs. (This comment also applies to Section 4.2.)

- Under 4.1A (page 35), we suggest the following edit: "Align the process of auditing approved PD providers with the definition of "professional development" [as defined by Learning Forward](#) and remove provider approval status from those providers not in compliance with the definition.

Section 4.2 Support for Educators

We agree with the Department of Education that it is critical to use federal funds to support state-level strategies designed to increase student achievement, improve the quality and effectiveness of school leaders, and provide at-risk children greater access to those effective school leaders. The early learning community has developed and implemented a number of methods designed to improve the quality and effectiveness of teachers, principals, and other school leaders, a few of which are highlighted below. Our recommendations are meant to build on ISBE's articulated approach and emphasize the importance of teachers who can meet the full range of a child's developmental needs, and leaders who can provide job-embedded professional support to those teachers.

- Under 4.2 (page 35-39): Principals and other school leaders have significant influence on creating and sustaining effective learning environments. Supporting differentiated instructional and assessment practices based on age/grade ranges, encouraging an open collaborative learning environment, directing resources where they can be most impactful, and engaging families leads to a well-functioning school. To date, school reform efforts have not been successful in eliminating the achievement gaps between children transitioning into kindergarten. Focusing on integrating early learning experiences with K-2 curricula, assessments, and professional development opportunities will support children's acquisition of critical cognitive and executive functioning skills, with each successive grade building on foundational knowledge and abilities. Remediating children after learning issues surface relies on children catching-up, which is not an effective strategy for academic success.

Title II professional development resources can be most effective when used to support the alignment of learning environments during the early childhood and early elementary grades, when the trajectory of a child's learning can best be impacted. Title II funds should be used in the following ways:

Increase student achievement consistent with the challenging state academic standards;

- Develop sequenced curricula, instructional expectations, and appropriate assessments between early childhood and early elementary classrooms.
- Build relationships with community-based providers to facilitate shared kindergarten entry expectations, joint professional development and family engagement, and kindergarten transitions opportunities.

Improve the quality and effectiveness of teachers and principals or other school leaders;

- Promote age appropriate quality instruction in the early grades that enhances principal's knowledge of play- and activities-centered learning environments that engage students and supporting teachers in shared lesson planning, analysis of assessment data, and problem-solving.
 - Focus attention and resources on student-based early learning and K-2 environments to strengthen learning in subsequent tested grades.
- Under 4.2A (page 35), we suggest the following edits: "Professional learning will be offered to principals, teachers, and administrators to build their content knowledge in the Illinois Learning Standards, gifted students, English Learners, students with disabilities, family and community engagement, trauma, mental health issues, restorative practices, cultural competence, anti-racism, recognizing implicit bias, and actualizing anti-bias approaches. Resources such as units and lessons for mathematics, English language arts, science, social studies, fine arts, and social-emotional curricula will be created and shared with all educators."
- Under 4.2A (page 35-36), we suggest the following edits: ""Districts, especially those identified for comprehensive services, will be provided professional learning opportunities that include strategies regarding leadership, reflective supervision, job embedded professional development, learning communities, data, outcomes, resources, learning design, implementation, recruitment and retention of teachers in high-poverty and/or high-minority districts, family and community engagement, restorative practices, addressing issues related to school conditions and school climate, and the use of referral mechanisms that link children to appropriate services."
- Under 4.2A (page 35-37), we suggest the following addition: "Leaders who facilitate evidence-based job-embedded professional development for their teachers that is planned, routine, collaborative and data driven, such as coaching, team lesson planning or peer learning groups, are more likely to see teachers improve compared to more traditional, ad hoc, offsite professional development. The state and districts should invest professional development funds to better equip school leaders to act as instructional leaders, particularly for teachers in the early grades. School leaders need knowledge of child development, pedagogical content knowledge, and knowledge of pedagogical practice and high-impact teacher-child interactions for young children. School leaders also need professional development to build their capacity as facilitators of continuous teacher learning and development. Instructional leaders set a vision for practice excellence and are intentionally focused on instructional quality and the systematic support of teachers. These leaders focus on student's learning, development and school readiness, supporting teachers to be effective in their work and cultivating strong partnerships with families. Instructional leaders facilitate ongoing, routine, job-embedded professional development for teachers such as data dialogues, team lesson planning and peer learning groups. The state should invest in and provide guidance to districts on the type of professional development that is most likely to be effective— professional development that is aligned to adult learning best practice, evidence-based, and has been proven effective in developing knowledge and improving practice and/or outcomes for students.

- Under 4.2A (page 37), we suggest the following edit: “Representatives from a number of groups advocate for supports for social and emotional learning, behavioral and mental health, and physical well-being, as well as trauma.”
- Under 4.2B (page 37-39), [ESSA provides opportunities](#) to expand high quality inclusion within early childhood settings. [Research shows](#) that attitudes and beliefs are often the biggest barrier to preschool inclusion. To reduce disparities in outcomes for children with disabilities, we must ensure that the professionals serving them in both school-based and community-based programs have the competencies and confidence to support them. This requires not only ensuring that children can enroll in all early childhood programs, but also that we have cross-sector professional development and embedded coaching and support.
- Under 4.2B (page 37), we suggest the following edit: “MTSS will provide services that focus on improving student performance in grades pre-k-12”
- Under 4.2B (page 38), we appreciate the reference to the Illinois Data FIRST project and ISBE’s continuing efforts to improve its data capacity.
- Under 4.2B (page 37-39), we urge ISBE to ensure that existing data systems and supports for improvement (Ed360, Online Impact, etc.) include data, assessments, and supports that are developmentally appropriate for leaders and teachers responsible for preschool-aged students.

Section 4.3 Educator Equity

- Under 4.3A (page 40), the draft plan states that an ‘inexperienced teacher’ is one with ‘less than one year’ of experience. While we’re we are not prepared to offer recommendations on the number of years a teacher must teach before they’re no longer deemed “inexperienced,” we would like to include in the draft plan some explanation as to why employing experienced teachers matter. According to [Closing the School Discipline Gap](#)², first- and second-year teachers tend to have comparatively lower classroom management and instructional skills (due to their inexperience), and under-resourced schools often have the most teachers with inexperience. Teacher inexperience is linked to greater rates of exclusionary discipline; the disproportionate exposure to novice teachers is thought to contribute to the increased risk for suspension documented for students of color, particularly black children. Hiring inexperienced teachers should not be discouraged, but new teachers need support and professional development, like coaching and mentoring.

Section 5.1 Well-Rounded and Supportive Education for Students

- Under 5.1A (page 41), we applaud ISBE for recognizing that learning begins at birth and acknowledging the Illinois Birth – 5 Program Standards and the Illinois Early Learning and Development Standards (IELDS) in the plan. Alignment of the IELDS and the K-12 Illinois Learning Standards is a critical step forward towards creating a coherent set of high-quality learning experiences that help children and families achieve their full potential. We

² Chapter 6, page 91

encourage ISBE to consider taking additional steps in the early years and grades that would strengthen the birth—grade 12 continuum, including implementing policies to guide the preschool to kindergarten transition process.

- Under 5.1A (page 41-42), we suggest including acknowledgement of the state’s strong commitment to high-quality early childhood programs for children under the age of three and their families. Illinois was the first state in the country to ensure a portion of early childhood education dollars went directly to programs for infants and toddlers. This past year, the agency’s legislative team [helped craft and pass](#) Public Act 99-589, a law which over time will grow the share of ECBG funding directed towards 0-3 programs by allocating 25 percent of any ECBG increased appropriation to the Prevention Initiative (PI). ISBE should be applauded for its efforts to ensure Illinois continues to be a national leader in providing high-quality birth-to-three services.
- Under 5.1A (page 42), we suggest the following addition: “The achievement gap can also be linked to socioeconomic factors. One national study documented that, before kindergarten entry, the average cognitive scores of affluent children were 60 percent higher than those of low-income children. [Another research study](#) indicated that four variables were associated with both academic and behavioral risk: parental education below bachelor’s degree, little/no shared reading at home, food insecurity, and fair/poor parental health.”
- Under 5.1A (page 44), we suggest the following edit: ““Response to Intervention (RtI) is a general education initiative that requires collaborative efforts from all district staff, general educators, special educators, [counselors and mental health staff](#), and bilingual/EL staff.”
- Under 5.1A (page 45), we suggest the following edit: “Illinois is transitioning as an agency toward cross-functional teams, situated within a statewide multi-tiered system of support (MTSS) to provide technical assistance, professional learning, funding, and related services and support that promote the shifts in pedagogy in all content areas in order to meet the needs of the whole child. This work draws extensively from the resources and statewide capacity developed by the Early Childhood Division, Special Education Division, College and Career Readiness Division, and the Foundational Services initiative. MTSS will provide support for schools and districts in balanced assessments, ELA, mathematics, science, [social-emotional curricula](#), family and community engagement, [the use of referral mechanisms that appropriately link children to services](#), continuous improvement, and teacher evaluation.”
- Under 5.1A (page 45), we suggest the following addition: “[The MTSS technical assistance, professional learning, funding and other supports should include supports for school leadership and job-embedded professional learning. All technical assistance, professional learning and supports should be evidence – based, align with the Learning Forward definition of professional learning and result in improved practice and student outcomes.](#)”
- Under 5.1B (page 45-47), we suggest the following addition:

“Educational outcomes (e.g., academic, social, emotional, mental, behavioral, and physical) of students are improved in schools with

- Positive school climates;
- A highly qualified workforce that is trained in engaging academic and climate and culture education;
- Adequate academic, social, emotional, and behavioral health supports and interventions;
- Coordinated systems for engaging, identifying, referring, and addressing student needs in a positive and proactive manner, and
- Strong leadership and organizational conditions that support the everyday practice of teachers³.

ESSA places an unprecedented priority on the provision of supports for young people struggling with barriers to learning, including programs that address academics along with the climate and culture of the school setting. Improving the educational outcomes for all students requires that schools – the places where children and youth spend most of their day – promote the necessary conditions for learnings, which include:

- A safe, caring, participatory, and responsive school/classroom climate; ~~and~~
- The development of academic, social, emotional, behavioral, and physical competencies;
- Effective and inclusive leaders;
- Ambitious instruction;
- Collaborative teachers;
- Supportive environment; and
- Involved families.

Barriers to learning and teaching, such as inadequate access to the general education curriculum, poverty, trauma, homelessness or instability in a living situation, disengagement, absenteeism, bullying, behavioral health issues, lack of or insufficient number of behavioral health supports in the school environment (such as counselors or social workers) must be addressed.”

- Under 5.1B (page 47), we suggest the following edit: “2) Provide early intervention and identification strategies and supports to reduce the possibility of escalating issues (developmental and mental health screening to identify problems early and evidence-based practices for content areas and social, emotional, behavioral and physical supports), such as the use of early childhood mental health consultation, family support, and inclusion specialists”
- Under 5.1B (page 47), we suggest the following edit: 3) Provide intensive, individualized supports for those students demonstrating complex, multifaceted needs including developmental screenings that could lead to qualification for special education services.

³ Dunlop, A. (2008). A literature review of leadership in the early years. Retrieved from: <http://www.ltscotland.org.uk/publications/a/leadershipreview>; Rodd, J. (2012). Leadership in early childhood (3rd ed.). Berkshire, England: McGraw-Hill International; Zaslow, M., Tout, K., & Martinez-Beck, I. (2010). Measuring the quality of early care and education programs at the intersection of research, policy, and practice (OPRE Brief No. 2011-2010a). Retrieved from: http://www.acf.hhs.gov/programs/opre/cc/childcare_technical/reports/

- Under 5.1C (page 47), we suggest the following addition: “In addition, ISBE will support local school districts in addressing issues of racism, implicit bias, and micro-aggressions and will provide guidance on collecting and analyzing data around school discipline, particularly in assessing for disproportionalities.” As a first step, trainings around recognizing implicit biases will be made available. Doing so will help diminish and address implicit biases, which have been shown to impact teachers’ expectations of students and the engagement of their parents/families, perceptions of student and parent behaviors, and students’ own perceptions and beliefs. Upon receiving such initial trainings, individuals will be more readily prepared to create the conditions in their school that will allow the culture and climate to be one that promotes, practices, and sustains anti-bias approaches. Additional professional development opportunities will be made available to guide and support the actualization and sustainability of the anti-bias approach.
- Under 5.1C (page 47-48), we suggest the following edit: “ISBE will support local districts receiving assistance and prioritize funding and/or staffing in schools experiencing high rates of poverty, homelessness, community violence, and students with special needs to improve school conditions for student learning by providing professional learning opportunities to work directly with these districts on the implementation of specific evidence-based practices for improved academic, social, emotional, behavioral, and physical student outcomes.”
- Under 5.1C (page 47-48), the Yale Child Study Center helped implement mental health consultation to early care and education centers through a statewide program in Connecticut. Researchers of the project found that after three months of consultation, the teachers in the active group reported a significant decline in the “externalizing or acting-out behavior problems” in their classrooms compared to the control group, which is important because externalizing behaviors are more likely to lead to classroom removal or preschool expulsions. In Illinois, there is a coordinated effort to advance the goal of a universal, effective, and sustainable early childhood mental health consultation model in Illinois, with an expanded qualified workforce. As a result, this project will strengthen the capacity of early childhood professionals, families, programs and systems to prevent, identify, treat and reduce the impact of mental health problems among infants and young children. Integrating mental health professionals into early care and education programs is a viable option to support the healthy social-emotional development of young children and the approach is more effective and cheaper than pushing children into special education classes, holding them back a grade, or suspending or expelling them for misbehavior. Thus, we suggest the following addition: “Title IV, Part A (Student Support and Academic Enrichment Grants), Part B (21st Century Community Learning Centers), and Part F funds (Promise Neighborhoods and Full-Service Community School Programs) can be used to coordinate with LEAs to reduce exclusionary discipline, implement evidence-based mental health awareness training programs, expand access for school-based counseling and mental health programs, and improve outcomes of children living in the most distressed communities through a community-based continuum of high-quality services. Programs can include school-based mental health services that are trauma-informed, prevent bullying and harassment, develop relationship-building skills, and train staff on trauma, classroom management, and child sexual abuse and prevention. Title VII funds (Impact Aid) will also be used to support positive school climates, and address childhood exposure to violence and the effects of trauma.”

- Under 5.1D (page 48-50), we suggest the following edit: “Additional standards-aligned resources specifically designed to differentiate content for student consumption in order to increase academic achievement for each and every student by providing resources that are developmentally, culturally, and linguistically appropriate and responsive.”
- Under 5.1E (page 50), we applaud the comprehensive approach ISBE has taken to family engagement, particularly with respect to young children and families and English Learners. We appreciate ISBE’s partnership with the Illinois Early Learning Council on family engagement efforts focused on the early learning community. ESSA allows family engagement funds to be used for joint professional development inclusive of early childhood educators, which creates more consistency and alignment in how families are engaged before and after school entry and provides opportunities for early learning providers and schools to partner and learn from one another to best meet the unique needs of families in their communities. That said, we also urge ISBE to using terms like “caregiver” or “guardian” instead of “parent” for the sake of inclusivity.
- Under 5.1E (page 50), we suggest that within the ISBE Family Engagement Framework, ISBE explore how family engagement can occur beyond the walls of one school and instead be expanded to caregivers across different schools and LEAs so they can create partnerships and collaborations that aim to contribute to systems change and influence policies and practices on a broader scale. In addition, it is recommended that in the area of Family Engagement, ISBE include and invest in multi-generation approaches that include the area of workforce development and career pathways for caregivers.
- Under 5.1E (page 51), we suggest the following edit: “Additional tools and resources will be integrated into the framework for more targeted and intensive individualized engagement with families of students with disabilities, EL students, students with mental health issues, and/or students with trauma.”
- Under 5.1E (page 52-53), we thank ISBE for highlighting the importance of family and community engagement in high-quality early learning, including mentions of the state Quality Rating and Improvement System (ExceleRate Illinois), the Preschool Expansion Grant, and the Early Learning Council. We are anxious to see more details on the framework.
- Under 5.1F (page 53), ESSA funds are intended to promote educational equity at elementary and secondary levels. We believe education equity is unattainable for children with disabilities if the state and local school districts do not promote the early identification of developmental needs and the delivery of special education instruction and support for children who need them. This is consistent with [the Departments of Education and Health and Human Services Policy Statement on Inclusion of Children with Disabilities in Early Childhood Programs](#).

Whether or not the Department offers further explanation, we ask ISBE to offer guidance on how to ensure that policies and practices supporting high quality inclusion are being established as outlined by the Individuals with Disabilities Education Act (IDEA) and recommended in the Federal Inclusion Policy Statement. The IDEA presumes that the first placement option considered for an eligible child with a disability is the regular classroom

the child would attend if he or she did not have a disability. Local education agencies must ensure that a free appropriate public education is provided in the least restrictive environment regardless of whether they operate a general early childhood program. This may include providing special education and related services in community based early childhood programs, including Head Start and Early Head Start programs, Preschool for All and Prevention Initiative programs and child care programs. We believe ESSA offers promising opportunities to expand teacher and leader knowledge on how to best support the educational opportunities of young children with special needs in all of these settings, and will require guidance on cross sector professional development and embedded inclusion support. We further request including guidance on specific strategies for delivering special education instruction and related services to children in community-based programs, where often there are barriers to promoting inclusion - such as lack of comprehensive services, limited time and commitment to build partnerships, and the need to build funding models that support children in both school and community based settings.

In particular, ISBE should modify one current policy that creates a barrier to promoting inclusion of children with disabilities with their typically developing peers. According to Part 226 of the Illinois Administrative Code, special education personnel reimbursement is applicable to staff who are teaching students with disabilities. But if there is a single teacher in a classroom with a blend of students with disabilities and general education students, no FTE is claimable. Put another way, the administrative code prohibits LEAs from using special education funds to support special education instruction in inclusive classrooms. This is a real barrier to effective implementation of the state's Preschool Expansion Grant, and to inclusion in general. This rule should be modified to facilitate improved braiding of funds to support inclusion.

- Under 5.1F (page 53), we suggest the following edit: "Illinois wants to ensure that, within the standard process for the identification of ELs in our state, there is a priority enough flexibility to identify children with disabilities, who may or may not need additional services other than linguistic services.
- Under 5.1G (page 54), we suggest noting in the state plan that there are important new elements of the required ESSA District Plan related to early learning that are not currently mentioned in this section: 1) School districts that receive Title I funding must coordinate with early childhood programs, regardless if they use Title I funding for early childhood, and 2) If a school district plans to use Title I funds for early childhood education, its Title I plan must describe how it will support, coordinate and integrate ECE programs, including transition planning.
- Under 5.1G.iv (page 55), we suggest the following edit: "ISBE shall use funds under this part to provide technical assistance and capacity building to districts to meet the goals of this program. ISBE will work to support districts in providing programs and activities that (1) offer well-rounded educational experiences to all students; (2) foster safe, healthy, supportive environments with adequate school resources (such as enough counselors, social workers, special education personnel) to address high level needs such as deep poverty, homelessness, community violence, and trauma, and drug free environments that support

student academic achievement; and (3) increase access to personalized, rigorous learning experiences supported by technology.

- Under 5.1G.iv (page 55), we suggest the following addition: “ISBE will use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs to reduce exclusionary discipline, implement evidence-based mental health awareness training programs, and expand access for school-based counseling and mental health programs. Programs can include school-based mental health services that are trauma-informed, prevent bullying and harassment, develop relationship-building skills, and train staff on trauma, classroom management, and child sexual abuse and prevention.”
- Under 5.1G.iv (page 56-57), we suggest the following edit under the section “Title IV, Part B: 21st Century Community Learning Centers: “The program helps students meet state and local student standards in core academic subjects, such as reading and math; offers students a broad array of enrichment activities that can complement their regular academic programs; offers literacy and other educational services to the families of participating children; and for counseling programs, including trauma-based responses.”

Section 5.2 Program-Specific Requirements

5.2.B.vii McKinney-Vento Education for Homeless Children and Young Program (pages 70-96)

The Every Student Succeeds Act (ESSA) makes some important updates to the McKinney-Vento Education for Homeless Children and Youth program, including the following requirements related to preschool age children:

- ESSA state plans must include procedures that ensure that homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children.
- McKinney-Vento liaisons must ensure homeless families and children can access early intervention services under IDEA Part C, if eligible.
- The definition of school of origin includes preschools.

Although ISBE’s draft ESSA plan adequately describes how Illinois will implement many McKinney-Vento requirements, new and old, we feel the plan would be significantly strengthened by more comprehensively addressing issues related to data collection and reporting, identification of homeless children, training for McKinney-Vento liaisons and other staff, cross-divisional collaboration, and transportation. Specific ideas for addressing these areas are included below.

Data

- Make data on the number of students identified as homeless publicly available on the ISBE website, and break down the data by age/grade level/race, including children under the age of three.
- Collect and make publicly available data on the number of homeless children who also have IEPs and/or who are English Language Learners, also by age/grade level.

Identification

- Update the Common Form to better reflect and support referrals to early care and education programs, particularly those programs that serve infants and toddlers, like Early Intervention and home visiting.
- Explicitly address the role and responsibilities of community-based organizations implementing ISBE-funded early childhood programs in recruiting, identifying, and reporting data on children experiencing homelessness, and otherwise meeting the requirements under McKinney-Vento.

Training

- Require training on the McKinney-Vento Act, as well as strategies for identifying and serving young homeless children for key early childhood program staff, both at the state and program level. McKinney-Vento liaisons cannot do the important work of removing barriers to participation alone and will need the partnership of teachers, administrators and other staff to truly ensure homeless children can access early childhood programs. Such partnerships cannot be developed through dissemination of information/outreach materials alone.
- Require liaisons to offer training and/or outreach materials to homeless service providers and early childhood providers in their communities multiple times each school year, as staff turnover can be very high in these settings.
- Provide training to liaisons on how to identify young children at risk of developmental delays and disabilities who may be eligible for Early Intervention (EI); provide training and support to liaisons for referring families to EI.
- Consider supporting regional or community-based cross-training for liaisons and service partners, particularly those that work with young children and their families, such as shelters, Head Start programs, Early Intervention services, home visiting, and child care.

Cross-divisional collaboration

- Ensure that ISBE early childhood policies, manuals, and training materials/efforts reflect the importance of recruiting, identifying, and enrolling homeless children in ISBE-funded early childhood programs.

Transportation

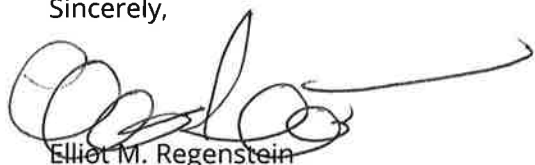
- Explicitly address the expectations regarding providing transportation for young homeless children to and from their early childhood program/school or origin. Clarify the role and responsibility of the LEA, LEA-administered Head Start programs, and community-based agencies implementing ISBE-funded early childhood programs as it relates to transportation.

Specific Recommendations

- Under 5.2A.A (page 58), we suggest the following edit: “ISBE will use 20 percent poverty as the initial threshold for schools to receive consideration for the schoolwide waiver. Further considerations will include the educational needs for schoolwide status, which may include the size of the school, the benefit the schoolwide status will provide, and other factors that the school wishes the state to consider. ISBE will also consider whether the school is located in a community with high rates of violence and student homelessness.”
- Under 5.2A (page 58), we urge ISBE to consider whether or not state- or federally-funded early childhood education - including Preschool for All, Preschool Expansion, and Head Start - is provided in the school when determining an LEA’s eligibility to waive the 40 percent schoolwide poverty threshold. These early childhood programs serve children living in poverty who are at risk of academic failure through comprehensive services, including family and community engagement efforts, to ensure that the needs of the “whole child” are met and children are given the opportunity to reach their full potential through age five. Enabling a school to use Title I funds to continue to serve these children as they move into kindergarten and the later grades regardless of whether the school overall meets the 40 percent poverty threshold, would provide the opportunity for the at-risk children who qualify for these programs to continue to receive comprehensive supports that sustain academic success as they move through the later grades in that school.
- Under 5.2.B.vi (page 64), we suggest that data on student progress and achievement be disaggregated by the number of years a student has been in an EL program. Additionally, we recommend that ISBE consider ongoing tracking of ELs’ academic achievement beyond point in time the student is considered English language proficient. Lastly, ISBE should consider including native language proficiency in their assessments in order to further promote sustained bilingualism and biliteracy.

For more information about our comments, please contact me at 312-453-1931 or eregenstein@ounceofprevention.org. Once again, we appreciate this opportunity to comment and look forward to helping ISBE develop its current draft into a final approved plan.

Sincerely,



Elliot M. Regenstein

Senior Vice President, Policy and Advocacy, Ounce of Prevention Fund

October 7, 2016

essa@isbe.net

Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Re: Partners *for* Each and Every Child (Partners *for*) is pleased to respond to the draft state plan submitted for public comment by the Illinois State Board of Education (ISBE) on August 25, 2016, as required under the federal *Every Student Succeeds Act* (ESSA).



ESSA and Equity in Illinois - Building Infrastructure for Better Engagement: For building a broad, collaborative, multi-sector community of stakeholders with a shared vision of excellence for all students at its core, ESSA offers a unique opportunity for more democratic participation in the shaping of the policies that govern our schools and educate our students. Continuous improvement involves identifying opportunities to improve, acting on those opportunities, and then assessing whether improvements were made.

We applaud ISBE's attention to these matters and agree with Superintendent Smith when he said, "So that we may collectively maximize the opportunities that ESSA presents for educating 'the whole child' and ensure the law's equitable implementation, ISBE recognizes the need to meaningfully engage all Illinois stakeholders," in a press release around this initial draft of the ESSA State Plan. We commend, and will use this letter to reflect on, much of ISBE's efforts thus far around engaging Illinois stakeholders in the ESSA policy development process. However, there remains a great distance ISBE can travel in connecting with state and local stakeholders traditionally underrepresented in this process and providing targeted and specific focus on discrete components and student populations identified in ESSA. The goal of our letter is to offer constructive recommendations and partnership to ISBE in meeting ISBE's strategic goals.

The New Federal Law (ESSA): ESSA provides the basic framework for this more locally driven – and potentially more directly democratic – paradigm for public education in its consistent, explicit call for stakeholder engagement throughout the processes of policy development and implementation (*see ESSA provisions, page 13 of the attached document*). Increased flexibility for states in this system, however, means raised stakes for the nation's most vulnerable children: if states do not meaningfully engage a broad cross-section of families and community stakeholders, it is very likely that historically underserved and underrepresented communities will be denied the full protections and benefits to which they are entitled. ***The success and sustainability of efforts to improve educational excellence and equity requires robust and thoughtful partnerships among federal, state, and local governmental agencies and stakeholders.***

The mission of the Partners *for* project is to build an infrastructure of interconnected work that will encourage a growing portion of the education policy community to break down barriers to advance sound educational policies, attentive to matters of equity and responsive to the needs of at-risk, under-served, and politically underrepresented students. A project of The Opportunity Institute, Partners *for* is a collaborative, nonpartisan network of education researchers, advocacy organizations, and policy experts who are committed to educational excellence for each and every child. The network grew out of the work of the Congressionally chartered national Commission for Equity and Excellence in Education.

The Proposed Rules (ESSA): The United States Department of Education’s (US ED’s) proposed ruleⁱ for ESSA requiring states to timely and meaningfully consult with stakeholders in the development, revision, and amendment of their State Plans, and to coordinate efforts across other Federal programs such as the IDEA, provide an opportunity for State Educational Agencies (SEAs) to keep the interests of politically underrepresented and under-resourced groups in keen focus.

ISBE’s Engagement Work to Date: Partners *for* applauds ISBE’s efforts to intentionally, regularly and deliberately engage with a diverse base of stakeholders in the development of a better, stronger state educational accountability system. NOTE: Partners *for* has already worked with ISBE on some of these efforts, and **we encourage ISBE to continue to refine and develop their existing stakeholder engagement strategy in the interest of furthering shared responsibility for educational equity and excellence and continuous improvement throughout ESSA implementation.**

ISBE has established an iterative plan development process conducive to transparently capturing and integrating stakeholder input. ISBE began gathering ideas for the first draft of the Illinois State Plan (ESSA State Plan Draft #1) by participating in a stakeholder-led June 2016 ESSA and Equity webinar, and has since hosted over 50 meetings with individual groups. These initial sessions sought to provide baseline ESSA information around components of the law, identify key issue areas for further discussion, and share information about the state plan development process.

Getting Early Input: ISBE’s Two Listening Tours, organized in various locations around Illinois in two phases (the first in April and May 2016, with a second round in September and October 2016) included presentations supported with issue-specific materials, resources, and timelines, which are currently available to broader audiences via ISBE’s website. These tours have complemented ISBE’s engagement with more institutionalized structures such as the P-20 council and another accountability workgroups, presenting the beginning of a balanced approach to receiving feedback from groups around the state.

Release of the ESSA State Plan Draft #1: The early September 2016 release of ISBE’s State Plan Draft #1, and ISBE’s commitment to making revisions to this draft plan also available for public comment, are excellent efforts toward ensuring continuous stakeholder engagement. The State Plan Draft #1 companion document, the Reader’s Guide, furthered these efforts by helping Illinois stakeholders’ understand the draft plan and focus their subsequent feedback. Specifically, the Reader’s Guide summarized ESSA’s requirements alongside corresponding sections of the draft plan, identified further considerations for stakeholders to keep in mind when reviewing and providing feedback on the draft plan, and provided suggestions for additional context and research.

Moving Forward: The advancement of educational equity under ESSA requires not only fluid collaboration among and between SEAs, LEAs, and stakeholders, but also the prioritization of the interests of historically underrepresented groups. Accordingly, Partners *for* is excited about the prospect of continuing to work with ISBE to refine existing stakeholder engagement practices, and to help ISBE assist LEAs in developing the structures, norms, timelines, and practices, including translation and interpretation services, that are needed to enable full community participation throughout ESSA planning, transition, and implementation.ⁱⁱ ISBE and LEAs in Illinois have much to gain from their improved

ⁱ See, for example, Proposed §299.15: Consultation and Coordination

ⁱⁱ These kinds of considerations are at the core of two Partners *for* publications: *A Handbook for Meaningful Stakeholder Engagement* (available at: partnersforeachandeverychild.org/P4_EngagementHandbook_ESSA_0616.pdf) and *In Consultation*

engagement with underserved and underrepresented communities, including the enhanced sustainability of efforts to improve outcomes for all children, better aligned services, and increased community investment in school improvement efforts through greater informational and procedural transparency.

From our work, observations, and relationships with a diverse range of stakeholders from around Illinois, we have identified, and use the following sections to address, gaps in ISBE’s engagement and policy development processes. We believe ISBE has the ability to perform better in reaching communities that represent *all* the children of Illinois. Highlights of Partners *for*’s specific recommendations include:

Prioritizing Equity

- ISBE should **establish systemic, long-term stakeholder engagement mechanisms** during its ESSA State Plan development process.
- ISBE should **develop tools and practices to work with underrepresented and underserved stakeholders in strengthening systems that ensure districts and schools effectively and efficiently identify and use resources** to enable all students to achieve state content and performance standards.

Including a Diverse Group of Stakeholders

- ISBE should **work with community partners to strengthen mechanisms of engagement** to ensure that all stakeholder input is included.
- ISBE should **develop and strengthen its networks connecting civil rights groups, community and parent groups, health-focused organizations, and researchers with schools, districts, and the state.**
- ISBE should **ensure that all stakeholders are included in conversations** and foster an explicit collaboration effort.

Informed Stakeholder Engagement

- ISBE should **prepare and make available materials** well in advance of meetings, have printed materials available for stakeholders to reference during the meetings, and share materials with their constituents following the convening.
- ISBE should **communicate a unified mission and vision about the importance of working with stakeholders** to create and strengthen its educational system by **working with community partners** to develop materials, co-facilitate meetings, and streamline messaging.
- ISBE should **amend the timing and format of Listening Tours and other public engagement events** to a more interactive discussion-based format, and schedule options at various times in the day to allow for more comprehensive input from a broader range of community members.

Continuous Improvement

- ISBE should **regularly conduct an internal review of existing engagement mechanisms used and feedback received throughout plan development** in order to make informed decisions about how to engage stakeholders as plans are revised and implemented over time.

(continued from previous footnote) ...With: The Case for Meaningful Stakeholder Engagement
(available at: partnersforeachandeverychild.org/P4_EngagementCase_ESSA_0616.pdf).

- ISBE should **develop a formal system of engaging communities throughout the ESSA implementation process** that considers capacity, staffing, resources, and decision-making authority, to **ensure continuous improvement**.
- ISBE should **develop guidance for its LEAs that sets expectations and demands accountability around local engagement** and supports the LEAs in creating structures for policy development through sustained community collaboration.
- ISBE should **create an internal and/or cross-agency team** to support and oversee the work of developing and implementing stakeholder engagement systems for continuous improvement.

Recommendations for Effective Collaboration

- ISBE should **partner with stakeholders to present evidence for decision making**, and seek ways to model or test practical solutions in different contexts.

Please see the attached *Strengthening Stakeholder Engagement in Illinois* for a set of detailed recommendations – grounded in our stakeholder engagement principlesⁱⁱⁱ – based on our assessment of ISBE’s ESSA transition efforts to date. Thank you for your attention to these matters. Partners *for* looks forward to continued collaboration with ISBE on these efforts. If you have any questions, please contact Molly Mauer at molly@theopportunityinstitute.org

Sincerely,



Christopher Edley, Jr.
Chair, Partners *for* Each and Every Child
Co-founder, The Opportunity Institute



Molly Mauer
Director, Partners *for* Each and Every Child
Senior Vice President, The Opportunity Institute

ⁱⁱⁱ For a review of the Partners *for* stakeholder engagement principles see *A Handbook for Meaningful Stakeholder Engagement* (available at: partnersforeachandeverychild.org/P4_EngagementHandbook_ESSA_0616.pdf), pages 2-3.



Strengthening Stakeholder Engagement in Illinois: Recommendations for ISBE's ESSA State Plan Development

ESSA presents new opportunities for shaping education policy by recasting federal, state, and local roles in ensuring educational equity. **Input and support from a broad and politically inclusive set of stakeholders is critical for advancing equity through the implementation of ESSA and for the ultimate sustainability of the law and of equity efforts in states, districts, and schools across the country.**



Stakeholder Engagement in Illinois: Recommendations

PRINCIPLE 1: Hold stakeholder engagement and the pursuit of equity and excellence as inseparable endeavors that must be practiced and reflected throughout the full decision-making and implementation process.

- **Create systemic structures and expectations** that embed stakeholder engagement throughout the policy planning process, in a regular and ongoing manner.
- **Prioritize more equitable outcomes for students throughout all policy and reform efforts**, taking into account both the immediate and cumulative impact of reforms on classrooms and school practice, and the improvement of key programs and activities.

Recommendations

Prioritizing Equity

- ISBE should develop tools and practices that prioritize historically underrepresented stakeholders and ensure districts and schools effectively and efficiently identify and use resources to enable all students to achieve state content and performance standards. For example, building system-wide leadership and capacity to ensure continuous improvement, ISBE should expand effective programs and policies and eliminate ineffective ones (e.g. connecting statewide data systems that track resource investments, programs, and outcomes; developing work plans; and evaluating the impact of cross-sector, inter-agency collaborations and workgroups).

PRINCIPLE 2: Include diverse groups of stakeholders, with a commitment to engaging historically excluded voices. Such a commitment goes beyond a more diverse invite list, and considers the structures, norms, timelines, languages, etc. that may unintentionally elevate some voices over others.

- **Work with key community leaders and networks** to identify and prioritize opportunities for stakeholder engagement, not only to understand and identify program challenges, but also as part of decision-making processes on funding, accountability, supports, interventions, data reporting and assessment.
- **Assess local community histories, needs, and resources** to develop a map of stakeholders that considers their knowledge, background, and expertise to inform key decisions.
- **Invest in diverse channels and mechanisms** to build public awareness and solicit feedback. Actively engage and support stakeholders that best represent the demographic, geographic, language, and political diversity of the state and make up a cross-section of community perspectives and experiences.

Partnership Highlight: There are already strong examples within Illinois of collaborative efforts at the school and district level. The Partnership for Resilience, whose members include teachers' unions, the Consortium for Educational Change, health care organizations, and Governors State University, works in districts in Chicago's southern suburbs to improve academic, health, and social outcomes for children by building sustainable community partnerships, developing and sharing informational resources, providing training and education programs, and advocating for the implementation of research-based policies.



The perspectives of historically excluded students (e.g. English Learners, foster youth) should not be seen as isolated sets of challenges experienced by a specific subgroup. And outreach and engagement efforts should not merely focus on increasing access to the existing decision-making structures and protocols. Rather, ESSA provides an opportunity for ISBE and districts to provide new and more responsive opportunities for the students, families, and communities whose voices have often been marginalized, to inform and support system changes, question traditional decision-making practices, and mobilize around the new law.





Stakeholder Engagement in Illinois: Recommendations


Recommendations

Including a Diverse Group of Stakeholders

- **Strengthening Mechanisms of Engagement:** ISBE should work with community partners to improve how stakeholders are engaged and ensure stakeholder input is actively considered in policy decisions. ISBE should:
 - Design agendas that prioritize participatory activities and provide written follow up to participants that acknowledges and elevates the critical perspectives these communities bring
 - Actively structure information sessions to consider the mechanisms, structures, norms, timelines, languages, and practices that elevate some voices over others;
 - Provide meeting materials in languages and formats accessible to all prospective meeting participants, ideally in advance of the meeting. ISBE should include translated materials and simultaneous interpretation services for non-English speakers and make materials available in an accessible form, including providing accommodations for stakeholders with special communications needs, and should also support LEAs in doing the same; and
 - Dedicate resources specifically to the engagement of stakeholders who represent historically underrepresented demographic, geographic, language, and political groups and who represent a broad range of perspectives and experiences.
- **Strengthening and Diversifying Partnerships:** ISBE should develop and strengthen its networks connecting civil rights groups, community and parent groups, health-focused organizations, and researchers with schools, districts, and the state. Some important considerations for achieving these ends include:
 - Prioritizing long-term engagement with underrepresented and underserved communities
 - Making information (e.g. opportunities for input and feedback, regular updates on ongoing priorities) available to these communities -- and to the schools and districts that serve them -- in ways that are directly responsive to their needs and concerns;
 - Working with superintendents and districts to ensure clarity and effectiveness of communication tools and strategies;
 - Supporting state and district efforts to prioritize procedural and informational transparency (e.g. including sharing decision-making timelines and evaluation cycles, relevant data/evidence, and describing expected impacts), particularly around significant policy and resource decisions;
 - Engaging legislators, especially in areas where implementing legislation will be necessary; and
 - Committing to convening around annual state reporting to US ED at the state and district levels.
- ISBE should ensure that all stakeholders are included in conversations and foster an explicit collaboration effort. ***For a list of stakeholder groups to include, please see page 12.***

PRINCIPLE 3: Support stakeholder engagement that is well-informed by developing and distributing necessary background information and by offering preliminary thoughts about key decision points and implications for program resource allocation, assessment and accountability.

- **Be intentional about making time and space** for learning and discussion among a diverse group of stakeholders throughout the process of designing, implementing, assessing, and refining reform efforts.
- **Engage communities** to review information and recommend and design improvements that reflect collaborative approaches towards building consensus.

Partnerships with stakeholders must be actively facilitated and supported through coordination at the national, state, and local level. In addition to “Town Hall” events and “Listening Tours” organized ahead of state and federal policy deadlines, establishing expectations, resources, and tools for parent, family, and community involvement in policy matters throughout the implementation process would go far in establishing shared accountability for continuous improvement. 



Stakeholder Engagement in Illinois: Recommendations

Recommendations Informed Stakeholder Engagement

- ISBE should accompany draft material with additional informational resources and questions to consider.
- ISBE should package a clear analysis of feedback to date that includes the iterative Illinois ESSA State Plan timeline, and next steps.
- ISBE should prepare and make materials available well in advance of meetings, and have printed materials available for stakeholders to reference during the meetings, and to share with their constituents following the convening.
- ISBE can communicate a unified mission and vision about the importance of working with stakeholders to create and strengthen its educational system by working with community partners to develop materials, co-facilitate meetings, and support consistent messaging. Wherever possible, the State Superintendent of Instruction should contribute to stakeholder engagement and messaging efforts either in-person or via pre-recorded or remote video to demonstrate ISBE's commitment to authentic engagement.
- To ease and improve the transition to ESSA, ISBE should develop, distribute, and provide support around materials designed to assist LEAs prior to the conclusion of the 2016-17 school year, with related trainings and technical assistance efforts planned through the beginning of the 2017-18 school year.
- ISBE should amend the timing and format of listening tours and other public engagement events to a more interactive discussion-based format, and schedule options at various times in the day to allow for more comprehensive input from a broader range of community members.

PRINCIPLE 4: Focus on continuous improvement as an essential paradigm/framework for engagement, including reflection on key decisions and implementation, as well as on the stakeholder engagement process itself.

- **Commit to transparent, evidence-based decision-making**, including establishing and following clear and consistent decision-making processes and timelines.
- **Establish a cycle of identifying opportunities for improvement**, taking action through planning and implementation, and assessing impact to inform next steps.
- **Determine how collaboration and engagement will inform an ongoing continuous improvement cycle** regarding state ESSA plans and related state policy; ensure that stakeholder engagement generates input and insight at key reflection and decision points.
- **Adapt strategies, allowing them to evolve** based on new data, information, needs, and resources; remain fluid and flexible in response to stakeholder input.

Partnership Highlight: The work of the Illinois Federation of Community Schools reflects a multi-disciplinary and inter-organizational commitment to a comprehensive, whole-child approach, with the recognition that health, wellness, social and human services, youth development and family-serving organizations all have a specific role to play in creating high quality teaching and learning environments. This extends beyond needs assessments and community meetings to consider opportunities for braided local and state funding and collaborative staffing practices to better align services, reduce redundancies, and support shared accountability for student success, such as placement of Department of Human Services counselors in high-need schools.





Stakeholder Engagement in Illinois: Recommendations

Recommendations Continuous Improvement

- ISBE should include community-based voices in early design and planning stages, and incorporate stakeholder feedback into ongoing implementation decisions; LEAs and schools will need ISBE's support and leadership in doing the same at a local level.
- ISBE should develop a formal system of engaging communities throughout the ESSA implementation process that considers capacity, staffing, resources, and decision-making authority, to ensure continuous improvement.
- ISBE should also provide the following kinds of assistance to schools and districts:
 - How to facilitate meaningful conversations at the local level.
 - How to help schools and districts apply conversations with stakeholders throughout the policy planning and implementation process.
 - How to establish local partnerships around evidence-based practices evaluation and understanding data.
 - How to develop tools to support improvement planning for schools identified under the state accountability plan.
- ISBE should commit to and model procedural and informational transparency over the coming years. This should include widely sharing decision-making timelines and evaluation cycles, relevant data/evidence, and information on progress made towards expected outcomes.
- ISBE should commit to convening stakeholders around annual state reporting to US ED at the state and district levels, to share information and to refine priorities
- Mechanisms for stakeholder voice and policy conversations should be continually examined to ensure they are including groups representative of Illinois' broad and diverse population
- ISBE should provide examples of authorized spending under Title I and Title IV.
- State and district entities should be included in co-facilitation and collaboration, and the independent efforts of community partners (family and local community advocates) should be supported by ISBE where possible.
- We also encourage ISBE's development of guidance in the form of an ESSA implementation district toolkit that draws upon the expertise of local stakeholders focused on community engagement and the perspectives of people that have not historically been engaged. This guidance should set expectations and accountability around local engagement and support LEAs in creating structures for policy development through sustained community collaboration. Among others, we suggest this toolkit cover the following topics:
 - Identifying district and school responsibilities in ESSA implementation
 - Engaging with stakeholders in a meaningful and sustained fashion
 - Prioritizing engagement with historically excluded voices
 - Using state and local data sources to inform accountability and report card efforts
 - Assessing needs and community resources
 - Developing structures to support the development of improvement plans
 - Identifying areas of flexibility where LEAs have the opportunity to go beyond requirements

* *Partners for* is in the process of producing a Local Education Agency toolkit for ESSA implementation that states can adapt and localize for this purpose.



Stakeholder Engagement in Illinois: Recommendations

Recommendations Continuous Improvement

- ISBE should create an internal and/or cross-agency team to support and oversee the work of developing and implementing stakeholder engagement systems for continuous improvement.
- ISBE should remain transparent about timelines and processes throughout plan development and implementation. *For a timeline of current planning and engagement efforts and questions to consider, see Page 11.*

PRINCIPLE 5: Seek to build consensus pragmatically; effective collaboration doesn't always mean full consensus.

- **Strive to find common ground**, be willing to work across political divides, and build on each other's expertise.
- **Commit to an understanding that the end product will result in some give-and-take** on all sides.

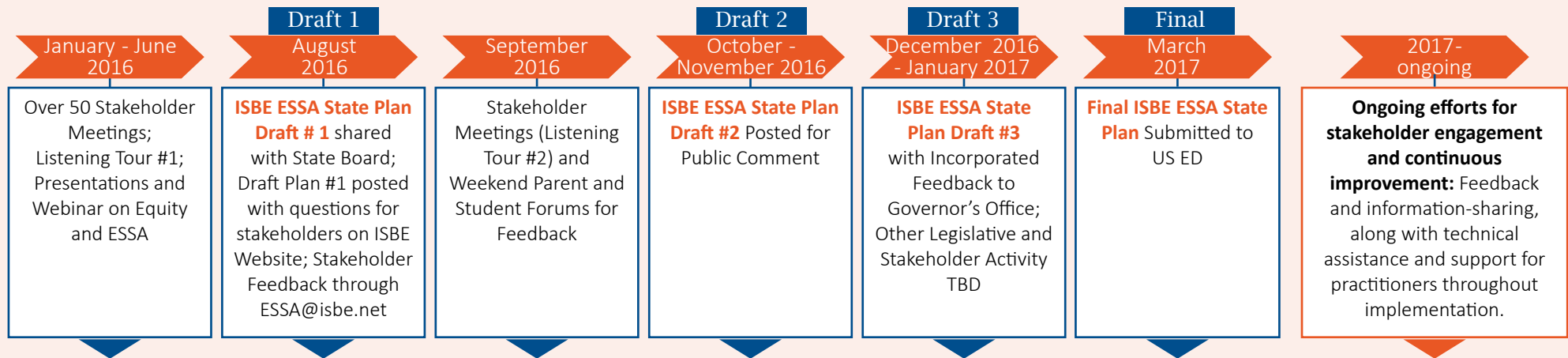
Recommendations Effective Collaboration

- ISBE should develop close partnerships with a diverse array of local stakeholders and networks (e.g. multi-stakeholder alliances, partnership, voluntary initiatives, or existing collaborative projects) to encourage deeper and more fruitful collaboration between schools and their communities, and enable the development of better, more comprehensive approaches to supporting students, staff, and schools.
- ISBE should partner with stakeholders to present evidence for decision making where possible, and seek ways to model or test practical solutions in different contexts.



Timeline of Engagement Efforts in Illinois: Developing the State Plan

The **Illinois State Board of Education (ISBE)** has been working with stakeholders around the state to develop their ESSA State Plan, including: providing an email portal to accept feedback along with resources on an ESSA-specific ISBE webpage; hosting two listening tours throughout the state; convening and seeking the input of select stakeholders (for example, the P-20 Council) throughout the state; writing and posting a draft plan for public comment and input from the State Board along with a *Reader's Guide* and explicit questions for stakeholder input; and providing a **transparent timeline for plan development**.



Questions to Consider

- How will ISBE improve stakeholder engagement with low-income and minority communities in this process or other processes?
- Has ISBE ensured that relevant data and evidence will be provided to inform and promote stakeholder dialogue?
- What are effective mechanisms for relaying feedback back to stakeholders once it has been collected and keeping track of input as it is incorporated into the state plan?
- How might stakeholder engagement efforts and strategies used in State Plan development become increasingly more targeted and focused, collaborative, and implemented on an ongoing basis, beyond State Plan submission?
- How will ISBE shift from a listening-centered approach to engagement with stakeholders to facilitating a more real-time, interactive, dynamic?

Meaningful Means Ongoing

What are the mechanisms in place for ongoing engagement and continuous improvement?

What are the ways in which stakeholders will continue to be engaged throughout implementation, moving forward?

How can stakeholder engagement efforts implemented throughout plan development be utilized after the State Plan is submitted in 2017?



ESSA Stakeholders to be Engaged

Partners *for* Recommends **Including the Following Stakeholders*** in Engagement Efforts

Civil Rights Organizations	<i>State:</i> Organizations that expressly support or advocate for underserved students (students of color, low-income students, ELs, students with disabilities, e.g. State Conferences of the NAACP) <i>Local:</i> Local affiliates (e.g. Urban League affiliates), local alliances, school-based support centers/providers, youth development organizations
Educators	<i>State:</i> National union affiliates, teacher networks, state union federations (e.g. Teacher Union Reform Network, Professional Association of Illinois Educators, Educators for Excellence) <i>Local:</i> Local union chapters, childcare providers, early learning practitioners, charter teacher alliances, teacher preparation programs, labor-management alliances
Advocacy	<i>State:</i> Grasstops organizations, education lobbying organizations <i>Local:</i> Community-based organizations (CBOs), families and family organizations, early learning advocates, students and student organizations, school-based personnel, community coalitions focused on public education
Philanthropy	<i>State & Local:</i> Local, state and national-level foundations or collaborative organizations with interest in state, district, or policy-based funding
Business Community	<i>State & Local:</i> Corporations, health and social service providers, local business organizations, faith-based organizations, and GED and workforce programs
Higher Ed, Certification Programs, Research	<i>State & Local:</i> Accreditation institutions for K-12 and higher education, teacher certification programs, state university systems, historically black colleges and universities, postsecondary minority institutions, community college systems
Professional Associations	<i>State & Local:</i> School boards, school business officials, school administrators, superintendents, principals
Elected Officials	<i>State:</i> Governor, state board members, state legislators <i>Local:</i> Mayors, City/County Council members, school boards
State Agencies and Governmental Bodies	Representatives from Indian Tribes, state legislatures and committees, housing, health/human services, Charter Management Operators (CMOs)
Local Agencies	Districts, school leadership, mental and physical health providers (e.g. clinics, preventive health, teacher consultancies, trauma-informed), CMOs, alternative and transitional education providers
Student Groups	<i>State & Local:</i> Youth and student groups that operate at the state and local levels

*See the U.S. Department of Education [Dear Colleague Letter](#) for more information about stakeholder engagement requirements under ESSA and a comprehensive list of stakeholders.



ESSA Stakeholder Engagement Provisions

An overview of the requirements for stakeholder engagement in the new federal law:

ESSA State Plans (*Title I, Section 1111*): States must work with stakeholders for State Plan development, including a period of public comment for 30 days or more; determination of N-size; development of the Comprehensive and Targeted Improvement Plans; collection and dissemination of effective parent and family engagement strategies to LEAs and schools; and the development and presentation of the state report card system.

ESSA LEA Plans (*Title I, Section 1112*): LEAs must develop their intervention plans in meaningful consultation with stakeholders, and that implementation strategies (including the identification of eligible student most in need of Title I services) include meaningful engagement as well.

Innovative Assessment and Accountability Demonstration Authority (*Title I, Section 1204*): Applications must demonstrate stakeholder collaboration in the development of the assessment(s) and assessment scoring; and must include a description of how the SEA will inform and gather feedback from stakeholders at the beginning of each year of implementation.

Flexibility for Equitable Per-Pupil Funding & Assessment System Audit (*Title I, Sections 1501, 1202*): Applications must include assurance that the pilot/program will be developed and implemented in collaboration with stakeholders.

Formula Grants to States & Subgrants to LEAs [Teacher and Principal Training and Recruiting Fund] (*Title II, Sections 2101, 2102*): SEAs must meaningfully consult with stakeholders to learn how to best improve the State's efforts under Title II.

English Language Acquisition, Language Enhancement, and Academic Achievement (*Title III, Section 3102*): The SEA and specifically qualified agency plans must be developed in consultation with stakeholders.

Subgrants to Eligible Entities [English Language Acquisition and Language Enhancement] (*Title III, Section 3115*): Local grants must promote family and community engagement in the education of English learners and that the plans be developed in consultation with stakeholders.

National Professional Development Project (*Title III, Section 3131*): Local grants must promote family and community engagement in the education of English learners.

LEA Applications under [21st Century Schools] (*Title IV, Section 4106*): LEA applications must be developed and implemented in continued consultation with stakeholders.

State Application [21st Century Schools] (*Title IV, Section 4203*): State applications must be developed in consultation and coordination with stakeholders.

Promise Neighborhoods (*Title IV, Section 4624*): Applications must include a needs assessment and include stakeholder engagement in the development and implementation processes.

Full Service Community Schools (*Title IV, Section 4625*): The Secretary must prioritize consortiums comprised of a broad representation of stakeholders or consortiums demonstrating a history of effectiveness.

Programs for Indian, Native Hawaiian, and Alaska Native Students (*Title VI, Section 6111*): LEAs must ensure that programming be operated and evaluated in consultation with stakeholders.



Additional Resources

Partners *for* Each and Every Child

In Consultation With... The Case for Meaningful Stakeholder Engagement | July 2016

A Handbook for Meaningful Stakeholder Engagement: A tool for SEAs | July 2016

Council of Chief State School Officers (CCSSO)

"Let's Get This Conversation Started: Strategies, Tools, Examples and Resources to Help States Engage with Stakeholders to Develop and Implement their ESSA Plans..." | June 2016

Leadership Conference on Civil and Human Rights

Parent and Family Engagement Provisions in the ESSA | January 2016

U.S. Department of Education

Dear Colleague Letter: the Importance of Stakeholder Engagement Throughout the Transition to ESSA | June 2016

Kent McGuire and Martin J. Blank

ESSA's Success Requires Stakeholder Engagement | May 2016

We'd like to acknowledge our Illinois Partners who provided valuable feedback on this submission:

- The Consortium for Educational Change
- The Center for Tax and Budget Accountability
- Latino Policy Forum
- Ounce of Prevention
- The Illinois Federation of Community Schools

For more information from Partners *for* Each and Every Child and our work in Illinois, please email us at illinois@partnersforeachandeverychild.org



For more information, to ask a question, or to submit feedback about the ESSA State Plan, please email ISBE at

ESSA@ISBE.net

or visit the ISBE ESSA Website at

www.ISBE.net/ESSA



essa@isbe.net

To Whom It May Concern:

The Illinois Association of Private Special Education Centers is a statewide group of non-public agencies providing day and residential services to children with severe disabilities. We are pleased to offer public comment on Illinois' implementation of the Every Student Succeeds Act.

There are many positive features of ESSA. We are pleased with the directive to focus on the whole child including health and social emotional needs as well as encouraging more parental involvement. Acknowledgement of trauma informed schools, person centered planning and positive school climate are big steps forward. Also welcome is the goal of reducing suspension and expulsion. We appreciate the integration of high academic standards with a less punitive approach to schools serving students in high poverty, high need communities. We applaud the expectation that state and federal regulators not promote rules that exceed the provisions of legislation.

However, we are concerned with the notion of combining IDEA funding with Title I and other sources of general funding. Federal and state governments are not meeting long standing goals for special education funding. Comingling funding for students with disabilities may impede our ability to track the adequacy of such appropriations and diminish the availability of services for children.

We also want to ensure that the achievement scores of students attending non-public schools are included in the data sets of the resident school district. Since students attend a non-public school for a shorter period of time, the best indicators of academic progress are growth measures administered during the student's tenure at the school, not an annual standardized test. Growth measures are more appropriate than academic achievement levels for schools serving a high number of students with special education and ELL needs and for high poverty areas.

We appreciate the invitation from Superintendent Smith to provide this public comment. We look forward to working with our public school partners to implement the specifics of ESSA.

The Legislative Committee of the Illinois Association of Private Special Education Centers.

Comments on Draft Illinois ESSA Plan
Raise Your Hand for Illinois Public Education
7 October 2016
info@ilraiseyourhand.org

Overview

ESSA requires an accountability system that provides meaningful differentiation in school performance. It sets out a few specific indicators and more kinds of indicators that states must use in their accountability systems. But it requires accountability. We must be clear on what accountability means. To hold someone or something *accountable* or to call someone *to account* means there is an "answering for conduct" or a justification of actions. Accounting alone, merely measuring, is insufficient for accountability. NCLB failed because there was never accountability, only accounting. The measures matter but taking five measurements, weighting them differently, and saying "that's our accountability system" is ridiculously inadequate. A meaningful accountability system requires more. The current draft is vague about what many of these indicators will be. Without more detail, we cannot assess the quality of the accountability system.

Any performance measure should take resources and challenges facing schools into account. The current draft omits measures from the accountability formula that would control for relative funding, poverty levels, class sizes, or the percentage of English learners -- all that factors affect performance. For example, a school that spends three times as much as another with the same proficiency level is not performing equally well. Under the proposed accountability system, there is no way to accurately and fairly hold a school accountable because these factors are ignored.

By contrast, there are measures included in the current formula that could penalize a school for lacking resources. High-school curricular offerings are a problematic indicator alone. An under-funded high school will have fewer AP or IB offerings and so would receive a lower rating, essentially punishing it for its poverty and the failure of our existing funding formulas.

Other suggested measures can yield counter-intuitive inferences. Consider attendance. We can understand that a school with low rates of attendance might have low rates of proficiency (absences retard proficiency). But what if a school has high rates of proficiency and low rates of attendance? Why would we lower a school's performance rating because it was more productive with students' time in school than its peers? And why should a school with high attendance but low proficiency be rewarded for

attendance without proficiency? It is not that measuring attendance is unimportant -- high attendance with low proficiency might indicate that instruction is ineffective. But these percentages alone are a poor indicator of school quality. Unfortunately, few of the indicators provide enough information to give an *account* of what affects school performance or actually hold a school *to account* for its performance.

Some of the Accountability Working Group ideas are promising (for example, grades, arts and enrichment coursework and social-emotional learning), but, when a "portfolio" indicator is a student's Lexile level (p.15), it is not clear we are talking about the same concepts even though the words are the same. New York has piloted a genuine portfolio-based performance assessment system that is both rigorous and rich -- what ESSA calls an "innovative assessment."¹ The flexibility in state accountability systems that ESSA makes possible will most strongly benefit public school students if the state seriously pursues establishing a system of high-quality innovative assessments.²

Below we address specific questions and requests for feedback ISBE posed in the ESSA draft.

Consolidation of Funds, Sec. 1.2 (5-6)

Any consolidations of funds must not use federal or state funds for special education for other purposes, in effect, redirecting special education funds away from its intended recipients. Using *other* federal and state funds to support special education is potentially useful. Fiscal or accounting changes that would eliminate accurate tracking of special education spending would also be unacceptable.

Locally Selected High School Assessment, Sec. 2.2 (10)

RYH supports the use of locally selected assessments under ESSA. The current draft does not specify the technical aspects of the assessments. International Baccalaureate Diploma exams should be one of the locally selected options.

Additional School Quality Indicators, Sec. 3.1 (15-17)

As stated above, several of the listed indicators are promising, but it is unclear in this draft how these items would be measured or how they would factor into the accountability formula. Focusing on the easily measurable factors that are already collected and reported (e.g., attendance, absenteeism, disciplinary data) adds little to

¹ See <http://performanceassessment.org/> and also [Education for the 21st Century: Data Report on the New York Performance Standards Consortium](#).

² For an overview of other assessment programs, including [New Hampshire's PACE](#), see [Assessment Matters: Constructing Model State Systems to Replace Testing Overkill](#)

our understanding of why schools and students succeed. Others are commendable, e.g., conducting Spanish-language literacy and science assessments for ELs (assuming Spanish is their first language). Our position is not that we should ignore factors like nutrition, teacher retention, student-counselor ratios, but that scoring a school as performing worse because its students lack adequate nutrition or have high staffing ratios would fault individual schools for factors outside the control of the school. One set of factors omitted from the list is school funding or per-pupil spending in relation to other schools. Again, giving a school a lower rating because it spends less would be wrong, but other measures of performance (e.g., proficiency levels) could be weighted upward or downward based on relative spending. This must be done carefully (e.g., we would not want a district to lower its spending in order to offset otherwise low proficiency measures).

College and Career Readiness, Sec. 3.1 (17)

Given that the SAT college readiness math benchmark score is at the 61st percentile of the nationally representative sample, we do not understand how Illinois expects to achieve college readiness for most of Illinois 11th or 12th graders. By creating at least six *necessary* conditions for college and career readiness, the plan would create numerous veto-points for students to achieve readiness. Even if a student had a 90% probability of successfully meeting each indicator, the joint probability of meeting all six would be 53%.

Weighting of Indicators, Sec. 3.1 (18-19)

ESSA requires that “much greater weight” in aggregate be given to at least academic proficiency, growth, graduation rates, and English proficiency than any fifth type of indicator or indicators. This requirement would be satisfied by a 55 percent aggregate weighting.

In the two examples, it appears that ISBE is assuming that all the measures would be in the form of percentages (e.g., proficiency, growth, graduation rate). While this makes the weightings simple to understand in these examples, it is not clear how many of the other measures proposed above would easily or meaningfully converted to percentages (e.g., staffing ratios, grades, socio-emotional learning).

Goal Setting, Sec. 3.1 (19)

Goal-setting must account for resources available. How achievable a particular goal is depends on the resources made available to achieve. Discussing achievability in the abstract is impossible.

Aggregating Measures, Sec. 3.1 (20)

Euphemisms should be avoided as should inaccurate language. For example, describing a school as “failing” because it is below a target would be inappropriate. ESSA requires that there be three levels of academic achievement as part of the state *standards*, but there is no requirement for a specific number of levels for the accountability system. The statutory requirement is that there be “meaningful differentiation.” Not only *could* this be satisfied by a continuous measure, it necessarily would be satisfied by such a measure because it would allow for meaningful differentiation among schools. Categorical measures, in contrast, would not allow for differentiation within a category.

Addressing Disparities in Funding, Sec. 3.1 (21)

As stated above, an accountability system that does not account for disparities in funding and resources and disparities in students’ socio-economic conditions is an inherently flawed system of accountability. At a minimum, relative spending per pupil and relative need per pupil should be factored into the system. Reporting raw dollars per pupil alone is inadequate: a school with more low-income, special education, homeless, and EL students will need greater per pupil spending than one with significantly fewer such students. But these factors are crucial if there is to be *meaningful* differentiation among schools, as opposed to merely *measurable* differentiation.

Providing an Accurate Story to the Public, Sec. 3.1 (21)

Data does not speak for itself; there is no clear meaning in uninterpreted numbers. A true accountability system requires a narrative component. Just as report card with only a letter grade or score tells a parent very little about the specific strengths or weaknesses of her child, an accountability report that provides no explanation is uninformative. We are aware how daunting a task this is but NY DOE does this for all its schools and other states are piloting school inspections.³

Identification of Schools, Sec. 3.2 (23)

We welcome ISBE’s criticism of the illogic behind ESSA’s fixed “lowest-performing 5 percent of schools” for “comprehensive support.” Therefore, focusing on high-schools with graduation rates below 67% is a reasonable step. However, there is a risk that this approach would divert potentially needed resources from elementary schools. Some balance is needed here.

³ At Vt. Schools, a Look Under the Hood, *Education Week* Vol. 36, Issue 06, September 28, 2016, 31

Exit Criteria, Sec. 3.2 (24)

One question posed was whether improved student outcomes to exit comprehensive support should include improvements in achievement or growth. We are unclear how a school could achieve any growth without some improvement in achievement.

October 7, 2016

Dr. Tony Smith
State Superintendent
Illinois State Board of Education
100 W. Randolph, 14-300
Chicago, Illinois 60601

Dear Dr. Smith:

Thank you for the opportunity to offer comment on the first draft of your plan for the Every Student Succeeds Act (ESSA). We appreciate the collaborative approach you and the agency have taken throughout this process as Illinois moves toward a fair accountability system that recognizes outstanding schools, supports schools that are struggling, and maintains a strong focus on student learning.

We have three general recommendations upon which we elaborate below:

1. Use growth as a significant factor in both elementary and high school accountability systems.
2. Maintain NCLB's focus on achievement of subgroups.
3. Require targeted support for schools that are struggling the most.

Use growth as a significant factor

The accountability system should be exceptionally fair to schools and students. Proficiency is not fair because it penalizes schools with students who start further behind. Similarly, significantly weighting inputs, such as access to programs and funding, is unfair because it also disadvantages lower-income districts. We support:

- **Adding PSAT in high school.** The SAT given once in high school as the only statewide high school assessment is insufficient. Illinois needs a high school growth model. Adding the PSAT in high school would provide this. (Section 2.2 (A))
- **Weighting growth more than either proficiency or the fifth indicator.** The biggest flaw in No Child Left Behind was that it based a school's rating 100% on the proficiency of its students. This more accurately measured the socioeconomic status of a school than the influence the school had on student learning. If we don't emphasize individual student growth significantly more than proficiency, we will replicate the failures of NCLB. Similarly, every student deserves access to pre-school, wraparound programs, college-ready coursework, enrichment, and an overall well-rounded education, but overly weighting these inputs also penalizes the most underfunded districts. (Section 3.1)

- **Measuring growth-to-proficiency.** To the extent allowable under federal regulations, Illinois should use a growth-to-proficiency model (such as Value Tables) as a portion of its proficiency measure. Along with being fairer, this also minimizes “bubble syndrome.” (Page 21)
- **Using growth toward English Language proficiency.** In the required English Language Proficiency measure, a growth-to-proficiency model better isolates the influence of the school on the student’s language growth. (Section 3.1)

Maintain NCLB’s focus on achievement of subgroups.

The biggest benefit in No Child Left Behind was that it required transparency of subgroup performance, which led to progress in closing academic achievement gaps.¹ Please make sure that the new system maintains that important focus. We support:

- **Factoring achievement of subgroups significantly into the overall rating.** Demonstrating success within each subgroup should be given significant weight. This should not be an asterisk or a footnote to an otherwise high rating; the system should never allow a school to get the highest rating if it is failing any of its student populations. (Page 20)
- **Including a new subgroup of former English Learners.** As ELs transition from bilingual programs, measuring their continued progress provides important feedback on how well their bilingual programs prepared them for success in mastering grade-level content.
- **Reducing n-size to ten.** Illinois has one of the highest n-sizes in the country, which can mask achievement gaps when there are smaller numbers of students in individual subgroups. We should reduce our n-size to ten.

Require targeted support for schools that struggle the most.

ISBE has done a tremendous job involving stakeholders in the conversation about designing the accountability system. However, without a meaningful system of supports, the accountability system will fall short of having demonstrable impact on student outcomes. We support:

- **Using contextual data to develop appropriate interventions and supports.** Determining the accountability system has comprised the majority of the time of ISBE’s stakeholder working groups and the IBAM committee. This makes sense because it is critical to get the identification right and provide transparency to parents and communities about school quality. We look forward to broader conversation about individualized supports and interventions based on a comprehensive needs assessment for struggling schools as the process continues.
- **Allocating funding only to districts funded below adequacy.** Because the state’s resources to support interventions are so limited, we support an additional criterion in the formula for allocation of school improvement funds. Most school districts identified for targeted and comprehensive

¹ “Pacts Americana: Balancing National Interests, State Autonomy, and Education Accountability,” Bellwether Education Partners, June 2015.

support will be severely underfunded and deserve additional funding for implementation. Some districts that are adequately funded already are also likely to need supports and interventions, and we believe existing district resources should be used to fund those efforts so that the additional federal funds can be focused on schools with a greater need for more investment. We also support the broader work of the Illinois School Funding Reform Commission, but see this as a parallel conversation to the ESSA plan development.

- **Requiring state support and capacity-building for districts without strong plans.** The draft plan says that: “Stakeholders were emphatic that there should be a minimum level of quality to the improvement plans, evidence of readiness to implement, and that the plans should be required for schools to receive more than the base-equitable amount needed for planning. When pressed to consider what was best for students in schools whose plans did not meet such criteria, respondents stated that if a school could not even create a solid plan for improvement, it was not going to be able to use any funds it received effectively.” But we believe it is unfair to penalize those students. In such cases, it may be appropriate for the state to take on a more significant role. Moving forward, consider what alternative options make sense to support struggling schools even if there are leadership deficiencies or capacity issues at the school- and district-level, possibly including on-site technical assistance, peer coaching opportunities, or other structural changes. (Page 29-30)

Thank you again for the opportunity to provide feedback on your draft. We looking forward to continuing to work with you and your staff as development of the plan continues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mimi Rodman', with a long horizontal flourish extending to the right.

Mimi Rodman
Executive Director

Illinois College and Career Ready Indicator Framework

www.redefiningready.org

Students are CC Ready if they meet the academic and standardized testing benchmarks:

- GPA 2.8 OUT OF 4.0
- Readiness college entrance score on the SAT

AND two or more of the following academic benchmarks or industry credential

- Industry Credential
- Dual Credit Career Pathway Course
- Advanced Placement Exam (3+)
- Advanced Placement Course (A,B,C)
- Dual Credit College English and/or Math (A,B,C)
- Algebra II (A,B,C)

AND two or more from the following behavioral and experiential benchmarks:

- 90% attendance
- 25 hours of Community Service (or military service)
- Workplace Learning Experience
- Two or more organized Co-curricular activities (including language and fine arts)

October 7, 2016 SEPLB FEEDBACK:

- Industrial Credential:
 - Region Specific: Kentucky example, needs for niche credentials
 - Challenge: Too broad
 - Could there be a common credential?
- Dual Credit/Advanced Placement:
 - Do all HS students have access to DUAL and AP Credit classes? If not, this should not affect their “college readiness.”
 - Will honors level courses equal AP courses? Or would there be an incentive to take honors level courses?
- Transitional Aspect
 - SHEEO August 2016 Publication: Mindful of career pathways and GPA, selectivity bands
 - <http://www.sheeo.org/resources/publications/roadmap-college-readiness>
 - Addressed P-20 challenges in College and Career Readiness
 - GPA no adequate for all, specifically engineering
- Foreign Language component
 - World language? Mandarin/Arabic, etc...
 - Bilingual Literacy exam
 - Workforce Globalization
- SAT Test
 - ACT/SAT –Should this apply to all students?
 - Is the score applicable to college readiness?
- Grades
 - Economic pressures (Grade inflation?)



SHRIVER CENTER

Sargent Shriver National Center on Poverty Law

RECEIVED

AUG 24 2016

State Superintendent's Office

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Chicago, Illinois 60602
312.263.3830
www.povertylaw.org

August 19, 2016

James T. Meeks
Chairman, Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Tony Smith
State Superintendent of Education
100 N. 1st Street
Springfield, IL 62777

Re: ESSA State Implementation Plan essa@isbe.net

Dear Chairman Meeks and Superintendent Smith:

We represent policy, advocacy and education organizations committed to effective public education for Illinois children, built on high quality early learning experiences. We appreciate the time and thoughtful effort the Illinois State Board of Education put into the statewide Every Student Succeeds Act (ESSA) listening tour to solicit input from stakeholders and community members, and the June 2016 findings report.¹ We note that numerous stakeholders spoke about using ESSA funding to strengthen preschool programs. We are writing to point out additional opportunities ESSA presents for the state to invest in learning from birth, and to strengthen the connection between schools and their communities. We respectfully request that you encourage school districts to use ESSA funding to expand supports for children from birth to age three, and that you provide tools and guidance for them to do so.

In order to close the opportunity gap, “[i]nvestments should start where learning starts—at birth.”² Cognition, hearing, receptive language, and speech production peak during a child’s first three years,³ and “700 new neural connections are formed every second” in the first few years of life.⁴ An abundance of research demonstrates initiatives directed toward children age birth to three build key foundational knowledge and competencies necessary for success at all life stages. According to the Harvard Center on the Developing Child, “[b]y age 2, infants and toddlers in families with lower incomes, less education, and fewer social supports are more likely to show gaps across all domains of development” and those same children often simultaneously face “[t]oxic stress [that] damages developing brain architecture, which can lead to lifelong problems in learning, behavior, and physical and mental health.”⁵ By the time a child reaches a K-12 school, a “window” to shaping the vital development of a child’s brain has closed. ESSA

¹ILLINOIS STATE BOARD OF EDUCATION, FINDINGS FROM THE ILLINOIS STATE BOARD OF EDUCATION LISTENING TOURS FOR LOCAL PERSPECTIVES ON THE EVERY STUDENT SUCCEEDS ACT 9 (June 2016), <http://www.isbe.net/essa/pdf/ESSA-tour-report-0616.pdf>.

²ZERO TO THREE POLICY CENTER, CLOSING THE OPPORTUNITY GAP FOR BABIES AND FAMILIES: ZERO TO THREE’S ROAD MAP TO REACH AMERICA’S POTENTIAL 1 (2016).

³*Id.* at 3.

⁴HARVARD UNIV.: CTR. ON THE DEVELOPING CHILD, IN BRIEF: THE SCIENCE OF EARLY CHILDHOOD DEVELOPMENT (2007), <http://46y5eh11fhgw3ve3ytpwxt9r.wpengine.netdna-cdn.com/wp-content/uploads/2015/03/InBrief-The-Science-of-Early-Childhood-Development.pdf>.

⁵*Id.*



funding and policies allow districts to reach children early enough to impact their learning trajectory. Because it is “easier and more effective to influence a baby’s developing brain architecture than to rewire parts of its circuitry in the adult years,”⁶ the Illinois State Board of Education should take advantage of state flexibility granted under ESSA to devote more state funds to early childhood education, and encourage local districts to use a portion of their ESSA funding for children age 0-3.

ESSA gives to state and local education agencies the ability to determine how to most effectively utilize ESSA funding, and the power to implement early childhood education.⁷ The No Child Left Behind Act previously included early learning as an allowable use of funds, and ESSA “takes the allowable use of funds a step further by explicitly naming early learning as an area for states, districts and other grantees to further their commitment to developing and expanding high quality early learning opportunities for their families.”⁸ Under ESSA, an “early childhood education program” means a Head Start or Early Head Start program, a state-licensed or regulated childcare program, or, more broadly, a program that “serves children **from birth** through age six that addresses the children’s cognitive (including language, early literacy, and early mathematics), social, emotional, and physical development; and ... is - (I) a State prekindergarten program; (II) a program authorized under section 619 [20 U.S.C.1419] the Individuals with Disabilities Education Act [20 U.S.C. 1431 et seq.]; or (III) a program operated by a local educational agency.” (emphasis added).⁹

We make the following recommendations to help children in Illinois start preschool with the tools they need to succeed:

Title I, Improving the Academic Achievement of the Disadvantaged, Part A

- Identify and disseminate information on promising practices in evidence-based family engagement and supports for children from birth that are already occurring in Illinois, including examples of how early childhood collaborations among LEAs and community partners are crafting programs to fit local needs.

⁶ *Id.*

⁷ Congress expressed its intent to give states greater discretion over the control of early childhood education programs and spending in the name of state autonomy. According to House Report 114-354 of the Every Student Succeeds Act, Congress stated, “It is the Sense of the Congress that a State retains the right to make decisions, free from Federal intrusion, concerning its system of early learning and child care, and whether or not to use funding under this Act to offer early childhood education programs. Such systems should continue to include robust choice for parents through a mixed delivery system of services so parents can determine the right early learning and child care option for their children. States, while protecting the rights of early learning and child care providers, retain the right to make decisions that shall include the age at which to set compulsory attendance in school, the content of a State’s early learning guidelines, and how to determine quality in programs.” H.R. Rep. No. 114-354, at § 8549B (2016).

⁸ Letter from Joint Advocates on Early Childhood Education to John King, U.S. Secretary of Education (May 25, 2016), <http://ffyf.org/resources/joint-advocates-letter-essa-guidance/>.

⁹ Every Student Succeeds Act, 20 U.S.C.A. § 7801(3) (16) (West 2016), *citing* Higher Education Act, 20 U.S.C.A. § 1003 (West 2008).

- Support data infrastructure and cross-agency collaboration to enable transfer of children’s records from birth to three early childhood education programs, to preschool, and later, to elementary school.
- Include early learning as a measure on Illinois’ State Report Card, including programs serving children birth to age six.¹⁰
- Advise LEAs that it is permissible to use Title I funds for early childhood education programs, and encourage LEAs to invest in birth to three services.
- Promote the use of linguistically and culturally appropriate behavioral and developmental screening of young children to identify possible delays or concerns, with referrals to Early Intervention centers for evaluation and services when indicated, and provide appropriate family support.
- Develop and disseminate guidance to help deepen districts’ understanding of coordination requirements and the new Head Start and Early Head Start performance standards.
- Encourage LEAs in need of an improvement plan to use strategies that include high quality early learning and evidence-based birth-to-three literacy and mental health services.

Title II, Preparing, Training, and Recruiting High-Quality Teachers, Principals, and other School Leaders

- Designate a portion of the Title II formula grant for supporting effective instruction to carry out activities that “[support] opportunities for principals, other school leaders, teachers, paraprofessionals, early childhood education program directors, and other early childhood education program providers to participate in joint efforts to address the transition to elementary school, including issues related to school readiness.”¹¹ We encourage ISBE to take an expansive view of what it means to “address a transition to elementary school” and use Title II funding to coordinate collaborative efforts to pinpoint and address community issues around school readiness, including linguistic and cultural diversity.
- Advise LEAs they may also include joint learning opportunities to broadly address transitions and early readiness in their professional development plans.
- Apply for a Comprehensive Literacy State Development Grant under Title II’s Literacy Education for All initiative to further develop/update comprehensive literacy instruction for students most in need, including initiatives directed at developing instructional support for parents and childcare providers.
- Using data collected from a statewide literacy needs assessment (required for a Literacy for All Grant), identify low-income areas in highest need of literacy reform, then widely encourage eligible LEAs and nonprofit agencies to apply for competitive grants or contracts under ESSA Section 2226 to implement evidence-based programs in high-needs locations. Release guidance that Title II grants are available to “support the development of literacy skills in low-income communities” and may include: “early literacy services,

¹⁰ See *What Early Learning in ESSA Can Look Like for States and Districts*, THE FIRST FIVE YEARS FUND 3 (May, 2016), <http://ffyf.org/resources/early-learning-essa-can-look-like-states-districts/>.

¹¹ Every Student Succeeds Act, 20 U.S.C.A. § 6611(c) (4) (B) (xvi) (West 2016).

including pediatric literacy programs through which, during well-child visits, medical providers trained in research-based methods of early language and literacy promotion provide developmentally appropriate books and recommendations to parents to encourage them to read aloud to their children starting in infancy . . .”¹²

Title III, Language Instruction for English Learners and Immigrant Students

- Identify and invest in best practices to support English Language Learners and immigrant families in transitions to preschool, including community engagement strategies.
- Identify and disseminate information on promising practices in fostering early dual language development.
- Identify and invest in strategies to build a qualified bilingual workforce to meet the needs of English Language Learners and Immigrant Students.

Title IV, 21st Century School, Place-Based Early Learning

- Support local efforts to invest in evidence-based community learning programs that serve young children and their families, including Promise Neighborhoods and Full-Service Community Schools, and other services focused on health, nutrition, mental health services, and early learning development in families with young children.
- Prioritize engaging families early and promoting parenting skills.¹³
- Facilitate cross-sectional partnerships and provide technical assistance for eligible entities to successfully navigate the application process.

Thank you for the opportunity to point out the many exciting opportunities ESSA presents for state and local education agencies to build on Illinois’ success in strengthening and expanding early learning services throughout the state, including for children from birth to three.

We look forward to working with you to build an integrated, strong early learning system in Illinois to support bright futures for all our children.

Sincerely,

Ann Courter
The Sargent Shriver National Center on Poverty Law
50 E. Washington Street
Chicago, IL 60602

¹² Every Student Succeeds Act, 20 U.S.C.A. § 6646(a) (West 2016).

¹³ See Every Student Succeeds Act, 20 U.S.C.A. § 7175(a)(1)(10) (West 2016).

Submitted by St. Clair Regional Office of Education #50
ESSA Recommendations for Further Consideration

Section 1. Consider using the current SSoS of fiscal agents in Regional Offices of Education (ROEs) and Intermediate Service Centers (ISCs) ROE/ISCs can be used as an audit/critical friend for districts.

Section 2. This approach allows all students in IL to have the opportunity to maximize assessments for both current academic measures and for post secondary education. Raising the proficiency level on ACCESS increases the need for licensed ELL teachers. ISBE should reinstate a grant process to help offset the additional cost. ROE/ISCs across the state could replicate St. Clair County's program serving ELL students in districts without resource to serve low numbers of students.

Section 3. A correlation of all internal district assessments should be created to determine readiness for PARCC. This is then easily accessible to the school community. Academic Indicators should include Pre-school/Kindergarten non-compulsory attendance. Johns Hopkins Early Warning Indicator can be implemented in all districts across IL to capture each student. At the high school level, districts need to increase opportunities for advanced coursework and credit recovery. Student growth should include all the academic indicators, not just test results. Non-academic Indicators really fit under topics further in this document. To create better transitions between Middle School to High School, districts could implement bridges from one to the next level. Continue to permit districts to waive subcategories when the category is less than 5% of the student population. When looking at goal setting, consider ambitious vs. attainable so that districts can reach their targets. The question of who sets these long-term and interim goals along with who approves them is important. ROE/ISC could play an integral role in this process. ISBE could use the four levels (like Danielson) when evaluating districts and schools for accountability. The timelines stated are realistic to measure real change but how will the long-term goals accommodate change in staff and student? To avoid districts focusing on "bubble kids", use the Danielson levels to eliminate the middle group in PARCC. Allowing school to report anecdotal data gives them a chance to tell "their story." ISBE needs to work to keep the reporting document (school report card) simple so that the public can read and understand. Continue to use the 5esentials or another climate survey part of reporting. Lowest performing schools and districts need to continue to be identified. Funding for these schools/districts can be tiered with services from the ROE/ISCs. The tiers could be services for "Targeted", "Comprehensive" and then a "School Improvement Grant" type of competitive grant. Focus services for all districts should be part of the plan. The length of implementation should be at least five years. Having a planning year as we did with new SIG schools this year is essential.

Section 4. Resource allocation priorities to first serve to improve classroom practice. Assuring high quality teachers and leaders is a priority. Foundational Services begins to address this by keeping practicing educators current and informed of the new trends and directions in instruction will add to improving student achievement.

Targeting our most needy districts whose staffs are either ineffective and/or inexperienced will also lead to increasing student achievement. Your definitions are accurate.

Section 5. Constraints in braiding or preventing them from using federal funds are numerous. If grants had the wording of using funds “reasonably” in areas such as food for working lunches and parent involvement activities or furniture to create new learning environments, or other activities if documented need exists. Allow Title II funds to be leveraged in any district with poverty. The link between students in poverty and our districts with the greatest needs is obvious. Following a funding formula such as the equitable funding formula is essential.

Thank you for your efforts to create a plan that reflects the diverse needs of students and districts in our state. ROEISCs can play a major role in this work by partnering with educational organizations across the state.

ESSA Response

Section 3: Accountability, Support and Improvement for Schools 3.1 Accountability System Page 21

There are a number of ideas that came to me in the portion that had the “additional questions.” When it comes to the “Bubble Syndrome” it is important to understand what the school’s public thinks are the most important factors for determining student success. I would be willing to bet that the first level is making sure a student graduates. While many public schools get well over 90%, the schools that we feel are the most struggling often are far from that 90% mark. The idea that a student must graduate from high school in order to achieve any future successes is a foregone conclusion. I would like to think that the order of goals for a school is as follows:

- Graduation Rate
- Longitudinal Student Growth
- G.P.A. Thresholds

A school could continually work to the goal of 100% graduation rate. If a school is under 90%, the key would be to try and increase the rate every year. If you start at 54%, the key would be to have more than 54% the next year. If you do not make it that first year, you get one year of probation. Two years in a row of decreasing graduation rates would cause the school to meet some sort of consequence. For example, restructuring or reshuffling of the administration. If a school is greater than 90%, the school would be in a safe harbor. If they could increase the rate above 90%, the school could be awarded. That would insure that the high achieving school continues to push towards the 100% mark.

As for the longitudinal student growth, I would like to see high schools to be graded on if **individual** students improve. For example, if the state is using SAT as the state’s junior exam I would love to see the student to have a score as an incoming freshmen that is scored on the same scale. While I do not love being married to a corporation, in this case College Board, I want to focus on individual student growth. If we do not go with SAT, ACT has an eighth grade exam that we could rely on. I am sure we also could look at percentiles if we needed to change assessments while we are in the process.

The key would be to make sure that the individual student improves as they move along through their educational career. The school would then look at individual students and if EACH were getting better. We then could give the school a score, for example, 75% of the student body has increased then we would want to increase that number the next year. Give the school the same two year time line that we gave for the Graduation Rates.

I do not like the idea of having grade point averages in the mix. The number one reason would be that the idea of indexing and weighting grades needs to be considered. I would want the students to take a rigorous class than taking an easier class to get a higher G.P.A. It also would put pressure on the teacher. I also would not want to elevate the focus of grades for determining student success. It encourages arguing about grades, or at times, academic dishonesty.

All of this should be constantly shared with the school's external public. The more they know the more they will be inclined to get that student taking those small steps. They also will embrace the graduation rate concentration. They will also like the approach of treating each child as an individual. The schools will want to educate their public. If they choose not to it will be their own undoing. If they feel that it is not important in sharing, they will not get that buy in. If they over share, the initiatives will either be appreciated or fall on deaf ears. If that was the case, no plan would ever be effective with the public.

**Feedback from Teach Plus Chicago Teaching Policy Fellows on
ISBE ESSA Draft #1 - 10/4/2016**



Team 1 - Accountability, Pages 13-21 (Brighid B, Nick S, Debra L., Tim A.)

Focus Question	Response
<p>1. ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators (e.g., why a particular indicator makes/does not make sense within an accountability system). p. 17</p>	<p>Overall, what is the research that supports the indicators listed in this draft? There are 40 listed - are all of them supported by research as valid and meaningful measures of school success? We suggest having experts in respective fields of research weigh in on these topics.</p> <p>When looking at the 40 indicators, some of them do not meet the criteria outlined in ESSA</p> <p>Grades - grades are subjective and not a valid or reliable measures of how a school is doing. At the same time, we have seen good results with on-track measures and support them.</p> <p>Chronic absenteeism can be used as a measure of wraparound services if there is a growth component, so it is not only capturing SES.</p>
<p>2. What other data do we want included in our reporting system, but not in our accountability system? (p. 21)</p>	<p>More attention to teacher retention</p>
<p>Other Suggestions?</p>	<p>There has to be a way to connect these ideas to funding appropriations to ensure the resources are there to support the initiatives</p>

Team 2 - Accountability, Pages 13-21 (Paula B, Jillian O., Annemarie T., Leah S.)

Focus Question	Response
<p>1. ISBE requests feedback on performance levels. More specifically considerations on</p> <ul style="list-style-type: none"> a. Number of levels, b. Terminology that can be used in expressing the performance levels, c. Suggestions that could assist parents and other interested parties in understanding performance levels and what they could mean for a school. d. p. 19-20 	<p>School grades are a good way for people to have a common language for school performance across the state. People will make assumptions about schools no matter what, so having a real system to discuss successes and areas for growth is preferably to not having anything.</p> <p>Numeric > traditional grade (A, B, etc.) (1-100)</p>
<p>2. How might a system avoid the “bubble syndrome,” which focuses on students who are most likely to meet standards instead of those who need additional supports to meet standards or who are at the higher end of the spectrum? (p. 20)</p>	<p>Using growth as a metric-- place growth in bands(i.e., RIT bands from NWEA) and show student growth within current level</p> <p>Concerned with PARCC as assessment measure, non-adaptive test can never truly isolate student ability when students are below or above. This makes it harder to measure schools on growth. Like the rigorous test, but would like a test that could give better data.</p>
<p>3. What needs to occur in order to ensure that</p>	<p>We do believe that some measure of school climate needs to be included in accountability. If we as a district can justify spending money on PARCC, we need to be able to put money on other measures such as 5 Essentials</p>

**Feedback from Teach Plus Chicago Teaching Policy Fellows on
ISBE ESSA Draft #1 - 10/4/2016**



schools are able to provide an accurate story to the public? (p.21)	survey.
Other Suggestions?	

Team 3 - Identification and Support of Schools, 21-29 (Kate K, Shannon S., Jim S., Alex K.)

Focus Question	Response
<p>1. How many years (up to four inclusive of a possible planning year) should schools with a student group whose performance is on par or lower than the performance of the “all students” group in the lowest performing 5 percent of schools have to implement a school improvement plan before it is identified as requiring comprehensive supports and services, and why? (p. 23)</p>	<p>4 years. It takes time to see the fruits of an improvement plan. Research shows that the first year a new curriculum is implemented, scores tend to drop. Schools need time for the plan to work. Schools should get the resources to implement the plan right away and ongoing throughout the 4 years...and then show progress monitoring data of their efforts and the impact on student growth (2 years).</p>
<p>2. With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not? (p.23)</p>	<p>Both growth and attainment need to be valued...kids at the top percentile with high attainment may be hard to show growth, while student who are grade levels behind should have their growth valued. Some sort of value-added measure to compare like demographics.</p> <p>Something to consider is transient populations...is there a way for accountability and tracking measures to take into account how long a student has actually been receiving instruction at the school.</p>
<p>3. For how long should a student group be underperforming before it meets the definition of</p>	<p>In reference to student groups...Something to keep in mind, research shows that ELLs take 4-7 years to acquire the academic English proficiency to perform on par with their native language peers. Consider innovative assessments that show promise in measuring emergent bilinguals’ progress. Transadaption tests are developed for bilingual students in native languages from the start and work to eliminate cultural bias. Bilingual mode assessments allow</p>

<p>“consistently underperforming”? The proposed regulations suggest identifying schools with these student groups every two years. What might the intended and unintended consequences of such a timeline be? (p.24)</p>	<p>students to draw on all their language capabilities to read and respond to test items. Dynamic assessments are performance-based and allow for the assessment of the process of learning, not just a product.</p> <p>Changing an improvement plan every 2 years won’t allow the plan to work. Concerned about PARCC’s ability to measure growth...we need adaptive tests that honor student growth. We need valid assessments for ELLs and students with IEPs.</p>
<p>Other Suggestions?</p>	<p>Accountability needs to lead to support, not punishment or unintentional outcomes such as too much time spent on test prep or anti-educational practices. When we rely on quantitative measures such as attendance, unintentional anti-educational consequences come up such as schools where children/families are “bribed” an extrinsically rewarded to death to get kids to school and the message/motivation of education gets lost.</p> <p>If schools are going to be accountable to the assessments, do all schools have curriculums aligned to the standards. That’s not currently the case. If schools don’t, are they getting resources to address the need.</p>

Team 4 - Identification and School Supports, Pages 21-29 (Heather D, Ray B, Sarena G., Katie C., Andrea P.)

Focus Question	Response
1. How should the state define “greatest need”? (p.29)	Lowest 5%
2. Which should be prioritized, districts with the highest concentrations of identified schools or highest numbers? Why? (p.29)	<p>Prioritize LEAs with the highest NUMBERS of identified schools so that the most students receive an impact.</p> <p>Note that if a district has a “super-concentration” of failing schools, then there should be an intervention at the district level rather than at the school level. (“super-concentration” to be defined...)</p>
3. What are practical ways for the state to include practitioners and stakeholders in the creation of a state formula and/or instruments that evaluate the quality of an improvement plan? (p.29)	<ol style="list-style-type: none"> 1. Don’t hold meetings in the middle of the school day. Schedule them for evenings and weekends. If teachers are willing to put the extra time in, board members should be willing to do so as well. 2. Actively advertise the information and enhance outreach efforts to teachers and stakeholders. 3. Reach out to superintendents and leverage them to get a set percentage of teachers involved-- set a minimum require of seats for teachers.
4. How should the state define and measure “readiness” and “strongest commitment” to implement change? (p.29)	<p>Plan criteria for demonstrating readiness and strongest commitment:</p> <ul style="list-style-type: none"> - A few clear areas of focus for improvement with defined benchmarks for measuring success. - Strong research-backed approaches and interventions within the plan. These research-backed approaches must be researched in settings similar to the schools in which they will be implemented. - Clear budget for allocation of proposed funding, including rationale for why funding is broken down as it is. - Clear backup plans for intervention if the initial plan does not succeed to indicate that the district has accounted for all eventualities.

**Feedback from Teach Plus Chicago Teaching Policy Fellows on
ISBE ESSA Draft #1 - 10/4/2016**



Other Suggestions?	We also think that districts should create a budget plan for the longer 3 year implementation resources. Planning grant must be significant enough to allow for true planning without spreading the school administrators too thin.

Team 5 - Supporting Excellent Educators pages 33-40 (Nicole A, Chris M, Trish D., Sabrina A., Alicia T.)

Focus Question	Response
<p>1. ISBE requests additional comments on the aforementioned suggestions or other uses of Title II funds. (p. 36)</p>	<p>Among the menu of options, will ISBE be focusing on any in particular? Will the state be establishing criteria for how local districts can structure programs to receive funding?</p> <p>Will there be a greater emphasis on some than others?</p> <p>Priority should be on teacher mentorship programs for peers to continue to support each other in a formal and effective way.</p> <p>The professional development of teachers as they continue to develop in their careers in order to attain more leadership opportunities, certifications, and trainings.</p>
<p>2. The equity plan does not include a definition of “Ineffective teacher.” ISBE proposes the following, but requests the assistance of stakeholders in developing a definition. (p. 39)</p>	<p>The definition provided by ISBE seems reasonable. Will variances among evaluation systems between districts matter a great deal?</p>
<p>3. The current definition in the equity plan states that an inexperienced teacher is an individual with ‘less than one year’ of experience. ISBE requests stakeholder input in developing a definition for this term. (p.40)</p>	<p>The definition provided by ISBE seems reasonable, but they also suggested other timeframes (ranging up to 4 years) for an inexperienced teacher. Does it seem arbitrary to select within the range?</p> <p>“Inexperienced” = Less than a year teaching Early Career Educator = 2-4 years teaching</p> <p>Developing a definition with more specifications determine the type of support needed in mentorship programs.</p>
<p>Other Suggestions?</p>	<p>What are the implications of Illinois Data First initiatives in the classroom?</p>



THE FEDERATION FOR
COMMUNITY SCHOOLS

Comments on Illinois' Every Student Succeeds Act Draft Plan

Submitted by Melissa Mitchell on behalf of the Federation for Community Schools

October 7, 2016

As part of the Every Student Succeeds Act (ESSA), Illinois will have new flexibility over how Federal funds are used and how school progress is measured, among other things. The state needs a far-reaching and innovative plan to change academic outcomes for students in low-performing schools, better support outcomes for vulnerable populations and to promote positive youth development as part of a larger, more comprehensive vision of success for children and youth. The state's plan needs to be guided by the need for equitable access to high quality learning opportunities, and a system for accessing supports that remove nonacademic barriers to academic success.

It is imperative that the Illinois State Board of Education (ISBE) continue the stakeholder engagement that has thus far taken place to support the ESSA plan's development. The state should also look to expand stakeholder involvement and include populations heretofore not involved in the ESSA plan conversations – youth, harder-to-engage parents and communities. As ISBE moves forward with finalizing its ESSA plan, continuing to build and expand stakeholder engagement not only strengthens the plan, it also sets up a structure that districts can use to engage families and communities in their own planning processes, as well.

Along those lines, it is important that ISBE develop a set of expectations of and guidance for meaningful family and community engagement in district and school-level planning processes. The expectations set forth in ESSA should comprise the floor – not the ceiling – of what the state expects from districts and schools in terms of ensuring that stakeholders have been partners in decision making around maximizing the flexibility and new opportunities offered by ESSA.

ISBE should also consider establishing an implementation taskforce. Comprised of a range of stakeholders, this taskforce could support ISBE in developing guidance for districts to use to implement the state's ESSA plan, set expectations for different types of stakeholder engagement and be partners in re-evaluating the state's plan and its components as necessary.

The state also has an opportunity to use ESSA as a lever to drive greater systems-level collaboration at the state and local levels. Many communities are already doing this kind of work – through community school and collective impact initiatives. The state can build on these experiences and use ESSA to prioritize cross-system partnerships that work to remove non-academic barriers to academic success in coordinated and efficient ways. Putting in place guidance around the use of Title I and Title IV funds, prioritizing authentic family and community engagement, incentivizing collaboration and coordination between schools and communities

and directing funding to these efforts are some ways that the state can use the opportunities offered by ESSA to be innovative and impactful in meeting the needs of all students in the state.

The recommendations below are intended to address specific aspects of the state’s draft plan – places where the state can look to use the community school strategy and its core components to improve outcomes for students across Illinois.

1.2 Plan Coordination

Recommendation: The state should coordinate and integrate Title I funding with other funding at the district or school level (special education funding, bilingual funding, 21st century funding) to hire school site coordinators who can support the integration of services for vulnerable populations. Leveraging funds in this way would promote comprehensive, efficient, and collaborative programming for students and families.

3.1 Accountability System

Equitable Accountability System- How might a system avoid “bubble syndrome?”

Recommendation: The state should include a concrete budgetary allotment dedicated to parent engagement activities linked to metrics and outcomes. To avoid “bubble syndrome,” districts and individual schools must be accountable to families for the outcomes of all students. Schools can create Parent Advisory Committees and recruit families from different vulnerable subgroups (such as EL students, special education students, and foster youth) to analyze school-wide data and take part in school improvement decision-making.

It is also important to invest in the human capital necessary to perform successful outreach to hard-to-reach communities. A school-site coordinator would be instrumental in performing outreach and leveraging resources to meet parent engagement goals.

- A. *Is growth in the “all students” group sufficient, or must there be growth for underperforming student groups as well?*

Recommendation: Growth for underperforming students should be required as a component of a statewide strategy to prevent bubble syndrome and promote engagement of hard-to-reach families. Furthermore, authentic family engagement should be one of the metrics on which the state tracks progress. The state should design guideposts for how to engage communities in needs assessments, asset maps, and school-wide plans with the goal to improve outcomes and mitigate or remove nonacademic barriers to success for consistently underperforming groups.

3.2 Identification of Schools:

- B. *Targeted Support and Improvement Schools*

What, if any, additional exit criteria should Illinois use? If so, what criteria and why?

Recommendation: The state should require that schools establish sustainability plans to ensure viability and success of school improvement initiatives. Comprehensive school improvement systems cannot be maintained without a strategic vision regarding ongoing management of programs, funding streams, and cross-system collaboration.

3.3. State Support & Improvement for Low-Performing Schools

What are practical ways for the state to include practitioners and stakeholders in the creation of a state formula and/or instruments that evaluate the quality of an improvement plan?

Recommendation: The state should include Community School Standards (*please see Appendix*

A) as an instrument to support stakeholders in evaluating the quality of an improvement plan. Community School Standards promote the success of academically at-risk students by creating structures for family and community engagement and wraparound supports that remove barriers to academic success.

B. Evidence-Based Interventions- ISBE requests stakeholder response or additional ideas regarding the ISBE proposal for evidence-based strategies

Recommendation: The community school strategy should be a fundamental component of the state's school improvement plans and plans for transforming low-performing schools. The community school model promotes academic achievement by fostering family engagement, aligning resources to remove nonacademic barriers to success, engaging the community in planning for school improvement, and providing afterschool programs linked to classroom learning and enrichment.

Grant recipients should be encouraged to use a planning year to spend a portion of School Improvement Grant funds on community engagement activities with the goal to develop the community school strategy and plan. For family engagement to support whole-school improvement, rather than just individual students, schools should structure key decisions to include family and community input. Core engagement activities should include involving the community in needs assessments and asset mapping, establishing organized parent groups, holding public meetings to engage parents and community members in shaping school improvement plans, and providing wraparound services to students and families. This planning year should also be spent establishing cross-systems alignment at the community level to foster sustainability of these efforts. Districts and schools can use the Community School Standards (*please see Appendix A*) as a tool to support the development of this infrastructure.

Section 4: Supporting Excellent Educators

A. Resources to support state-level strategies

Recommendation: The state plan should prioritize professional learning opportunities that support teachers in engaging parents and communities as partners in education. Principals also need professional development that builds their capacity in developing cross-community partnerships and creating a structure of shared decision-making with parents and community members. Parent engagement is often avoided or ignored because schools don't have the tools or strategies to implement effective outreach and services for families. The community school model provides a structure that principals can use to accomplish these goals.

Section 5: Supporting all Students

E. Parent, Family, and Community Engagement

Recommendation: The majority of community schools in Illinois operate on Title IV, Part B 21st Century Community Learning Center (21st CCLC) funding. Many grants are used for community schools versus stand-alone afterschool programming. As such, the state should include Community School Standards in the ESSA plan in addition to ACT Now afterschool program quality standards as a tool to support districts in combining classroom changes with wraparound supports that remove barriers to academic success. Providing grantees with tools that they can use to deepen the efforts they undertake with 21st CCLC funds is one strategy that the state can use to maximize its strategic use of Federal funding.

Furthermore, the state should take advantage of grant opportunities available through Title IV, Part E of ESSA to establish a state-wide system of school-based resource centers for

youth and families. ISBE could model an Illinois resource center initiative after Kentucky's Family Resource and Youth Services Centers, which were established in 852 schools across the state following the Kentucky Education Reform Act of 1990.

APPENDIX A: Community School Implementation Standards (draft)

Revised May 23, 2016

Created by the Coalition for Community Schools and Partners for Each and Every Child, with support from partners including the Federation for Community Schools and key stakeholders in Illinois.

The overall purpose of this project is to engage and support the local and national Community Schools movement as a standards-driven, evidence-based strategy to promote equity and educational excellence for each and every child.

Implementation standards can help new sites more effectively develop their community school strategy, assist existing schools to strengthen their practice and document outcomes, and help provide a consistent language and framework for advocacy, technical assistance, research, funding and policy engineering.

Background to Community Schools and Guiding Principles

The new Every Student Succeeds Act (ESSA) that replaces No Child Left Behind contains several key provisions that advance the vision of community schools ¹(Title IV, Part F, Subpart 2—Community Support for School Success²).

The legislation recognizes that achieving excellence in American education depends on providing access to opportunity for all children, and that increasing inequality within external social, economic and community factors – traditionally viewed as outside of the domain of schools -- have a significant influence on academic outcomes and a persistent achievement gap.

A community school strategy makes explicit that in order to significantly improve the academic and developmental outcomes of children, schools must work with partners – e.g. families, community organizations, institutes of higher learning, public agencies – to ensure that all students have equitable opportunity to succeed in school.

While the rationale behind a comprehensive approach to student learning is simple, actual implementation requires a transformational shift in the way that public schools (and all of the adults within and around them) function.

¹ “(2) FULL-SERVICE COMMUNITY SCHOOL.—The term ‘full-service community school’ means a public elementary school or secondary school that— “(A) participates in a community-based effort to coordinate and integrate educational, developmental, family, health, and other comprehensive services through community-based organizations and public and private partnerships; and (B) provides access to such services in school to students, families, and the community, such as access during the school year (including before- and after-school hours and weekends), as well as during the summer.

² Title IV, Part F, Subpart 2—Community Support for School Success Full Service Community Schools program The bill also contains provisions that advance the community schools strategy, including the requirement for indicators beyond academics in state and district accountability systems; supportive programs including Promise Neighborhoods and 21st Century Community Learning Centers; and a new set of tools and resources to boost results-focused school-community partnerships for young people’s success, including integrated student supports, needs assessments, and professional development for educators to work more effectively with families and communities.

The following seven principles guide a community schools approach to school transformation, and provide a framework that undergirds each of the community school implementation standards.

Programmatically, a community school is often characterized by a wide array supports and services to enhance conditions for high-quality teaching and learning, so that all children can learn. Such programs often include*:

- **Expanded learning opportunities**, such as afterschool and summer programs, to engage students as independent learners;
- **Health and social services and supports** to assess and address the basic physical, mental, behavioral and emotional health needs of students and their families;
- **Family engagement** to mobilizes family assets and work together as partners in their children’s learning;
- **Community engagement** to align and leverage community and neighborhoods resources to enhance student success;
- Programs that support **seamless transitions** from early education through college and career.

Many of these program areas benefit from respective field-specific implementation standards to ensure high quality service delivery. And while program elements are important hallmarks of a community school strategy, piecemeal programmatic investments do not result in a cohesive, sustainable, and transformational community

1. **EQUITY** -- Educational excellence and equity are inseparable. Community schools work purposefully to disrupt deep histories of structural inequity that keep students of different backgrounds and races from achieving equitable outcomes. This means paying explicit attention to policies, practices, and cultures that reinforce patterns of educational inequity.

2. **WHOLE-CHILD APPROACH** to teaching and learning -- meaningful teaching and learning extends beyond mastery of core subjects, and includes social-emotional learning, critical thinking, and problem solving.

3. **STUDENT-CENTERED** conditions for learning -- Prioritizes creating the optimal conditions for each student, and a safe and positive school climate inside and outside of the classroom, for teaching and learning so that students are motivated and engaged in academic and youth development.

4. **INTENTIONALITY** -- A community school organizes its resources, time, and partnerships so that they are guided by and responsive to reliable information, and are designed to achieve specific results.

5. **INTERDEPENDENCE** -- No single entity can create all of these conditions, so community schools build partnerships that share responsibility and accountability for progress. Student success relies on recognizing and strengthening mutual interdependencies across traditional program areas and disciplines, and requires explicit investment in collaborative planning and process.

6. **RELATIONAL TRUST** -- Such interdependencies are built over time, and become infused within the day-to-day social exchanges within a school community. Research from Bryk and Schneider (2011) find that social trust among teachers, parents, and school leaders improves much of the routine work of schools. This is a key resource for transformation by supporting a safe, respectful and trusting climate where caring adults rely on each other as part of a shared approach to student success.

7. **LEARNING ORGANIZATION** -- improved student learning depends on a school community that has a commitment to, and opportunities for working together, in ways that require individual and collective investment, builds adult and teacher capacity to be responsive to student needs, and prioritizes continuous improvement and learning.

In combination, and when guided by a coherent and rigorous vision of student and school success, these principles provide a strong foundation for the pursuit of community school strategies — a comprehensive partnership approach to meet students’ conditions for learning.

Community School Implementation Standards – DRAFT for discussion

The development of Community Schools Implementation Standards serves as a first step in identifying **the knowledge, skills, and dispositions that school and community partners need in order to plan and implement successful and impactful community school partnership strategies.**

The Standards are organized into six domains and for each domain, we describe high-level implementation practices. Detailed indicators are forthcoming, that will describe specific ways that community school practitioners and partners might meet each standard as part of a comprehensive and coherent community school strategy.

1. Collaborative Leadership: nurtures shared ownership and shared accountability.

- 1.1 Multi-disciplinary, cross-sector community partners share responsibility and accountability for student and school success.
- 1.2 A representative site leadership team, including the principal, other school personnel, families and community partners guides collaborative planning, implementation, and oversight.
- 1.3 The principal works actively to integrate families and community partners into the life and work of the school.

2. Planning: school improvement plan incorporates the assets and needs of school, family, and community.

- 2.1 A shared vision drives educators, families, and community partners in their planning.
- 2.2 Data on school and community indicators, disaggregated by race, gender, disability, income, and other relevant factors, informs the school improvement plan.
- 2.3 A needs and assets assessment of the school, student, families, and community is conducted regularly to inform the school improvement plan.
- 2.4 The school improvement plan explicitly outlines the role of families and community partners in helping to achieve specific results.
- 2.5 The academic and non-academic results and related indicators that the community school seeks to attain are specified in the school improvement plan.
- 2.6 School improvement plan identifies evidence-based programs and practices.
- 2.7 The school site leadership team plays a decision-making role in the development of the school improvement plan.
- 2.8 A mechanism for measuring progress toward desired results and indicators is defined in the plan.

- 3. Coordinating Infrastructure: facilitates coordination of school and community resources.**
- 3.1 A dedicated full time coordinator facilitates alignment of people, programs and practices.
 - 3.2 School personnel and community partners are organized into working teams focused on specific issues, e.g., mental health, after school, mentoring.
 - 3.3 School personnel and community partners assess the effectiveness of their relationships on a regular basis.
 - 3.4 Community School Coordinator is a member of the school leadership team.
 - 3.5 The Community School Coordinator facilitates close communication among the principal, teachers, other school staff, and community partners.
 - 3.6 The Community School Coordinator facilitates school and partnership data collection, sharing, and analysis.
- 4. Student-Centered Data: data guide assistance to individual students.**
- 4.1 Data systems and protocols are in place to assure that each child receives individualized support.
 - 4.2 Policies and procedures are in place to safeguard student confidentiality.
 - 4.3 Interdisciplinary teams use data to prepare individualized plans to make sure every student gets the opportunities and supports they need.
 - 4.4 Agreements are in place to share student data and data on services being provided to individual students among school personnel, community school coordinators and community partners.
- 5. Continuous Improvement: deepens the impact of the community school.**
- 5.1 Data and participant feedback are analyzed annually by the site leadership team to assess program quality and progress and develop strategies for improvement.
 - 5.2 Issues requiring policy or procedural changes and resource needs are communicated to leaders and staff at the systems level.
 - 5.3 Joint professional development enables educators, community partners and families to develop the knowledge, skills and abilities to work effectively together, share best practices and apply those practices in their work.
 - 5.4 Community partners participate in relevant professional development sponsored by the school district.
- 6. Sustainability: ensures ongoing operations of the community school.**
- 6.1 A strategy for continuously strengthening shared ownership for the community school among school personnel, families, and community partners is in place.
 - 6.2 A plan to sustain funding for the community school, including both the position of the community school coordinator and specific programs is in place.
 - 6.3 Principals prepare budgets with a view to helping sustain the community schools.
 - 6.4 Community partners commit to a long-term relationship with the school, driven by student and school needs, and modify their organization and culture to support the community school partnership
 - 6.5 Community partners help generate funding for programs that will be operated under the umbrella of the community school.
 - 6.6 Educators, community partners, and families publicly advocate for community schools within their organization and across their community.

Appendix A: Common Program Elements of a Community School

Expanded Learning: engages students as independent learners.

- Teachers work with community partners to provide a well-rounded and enriching core curriculum during the school day.
- Students have access to enriching after school programs that are aligned with the curriculum.
- Students have access to enriching summer learning experiences.
- Students have access to supportive environments as needed before school and during school breaks.
- Joint professional development opportunities are available to teachers and staff of community partners.
- Learning experiences incorporate a focus on real world issues and enable young people to be problem solvers in their own communities.
- Learning experiences in community schools meet quality standards defined by specific program fields (e.g., after school, summer learning, service learning, project-based learning, common core).

Health and Social Services and Supports: addresses basic needs.

- Students and their teachers and families are knowledgeable about the services and supports that are available at, or through, school, including physical, mental, behavioral and emotional health.
- Services and supports are culturally responsive.
- Health and social supports and services respond to the needs of students, teachers and families, and focus both on prevention and treatment.
- A student support team including specialized instructional support personnel, community partners, other school staff, and involving families where appropriate, develops and oversees a plan to respond to individual student needs.

Family Engagement: mobilizes family assets.

- Two-way communication between school and families is proactive and consistent.
- Families have a strong voice in the community school's leadership and decision-making structures.
- Leadership development opportunities are regularly available to families and community residents.
- A safe, supportive and respectful climate welcomes students, staff, families and the community.
- Educators, families, and community partners demonstrate trusting relationships.

Community Engagement: gathers community and neighborhoods resources.

- The school is a venue for exploring and addressing problems affecting the school and the community.
- The school building is open and accessible beyond the school day, including evenings and weekends.
- Families and residents see the school as a hub of learning and community development.

Programs that support the seamless transition from early education through college and career.

October 5, 2016

Dear Colleagues and Illinois State Board of Education Members,

Thank you for the opportunity to collaborate with you as we craft a stronger and more meaningful state accountability system. Attached is a document with page-by-page feedback to the September 2016 draft Illinois plan from School District U-46.

We appreciate the effort to develop a more holistic system that addresses the whole child and no longer treats schools like assessment factories with one-size-fits-all expectations that lead to punitive labels and sanctions. We appreciate the comprehensive secondary metrics that promise to render a more complete picture of a student's readiness for college and career. We look forward to seeing the State's updated and more detailed plan later this year.

We believe we should not talk about innovation or adopting a new accountability plan in this large and diverse state without addressing the funding inequity that has ranked Illinois among the worst in terms of education spending and support. We should not ignore that fundamental issue or perpetuate the myth that schools should see "equal" student performance outcomes or varied levels of growth when school districts with higher concentrations of poverty are taxing their residents at rates far above the state average, yet spending less money per pupil.

Equitable funding should be the foundational reform as we look at how we drive improvement and monitor progress. That means districts with a higher concentration of students from low-income families, those learning English or those who have special cognitive, physical or emotional needs are going to need more resources. Educators across the land can identify those needs and respond to them but they need the resources to do so.

As the State's second largest district and one that has embraced dual language programming, we are chiefly concerned with the treatment of our fast-growing segment of English Learners. Three out every 10 students in U-46 are English Language learners and the majority of these students are on their way to becoming bilingual and biliterate through our dual language programming. We are calling for greater recognition and support of bilingualism in our state.

Illinois should include former English Learners in the EL subgroup for the full four years as allowed by ESSA, rather than quickly move these students into a general subgroup. ESSA allows for states to track former EL progress for all indicators and not just assessments. This will help provide an accurate picture of EL program success and we encourage Illinois to take advantage of this measure.

Additionally, if Illinois truly values biliteracy, the State will support a single test to measure language proficiency. Currently, every district in the state could use different assessments to measure language proficiency. This devalues the Seal of Biliteracy. A student could be considered biliterate in one district but not another. The State should support (fund) one test. If a district wants to use a more rigorous assessment (AP

language tests), there could be allowable exceptions, but the bar needs to be set by the State. This promotes consistency and demonstrates that Illinois does truly value developing biliterate students.

We have adopted and implemented new learning standards in Illinois that emphasize the application of knowledge. This is a huge step forward. Now we need tests that go beyond written responses and require students to show they can apply their knowledge and skills in a real-world context. We encourage Illinois, as one of the largest states, to apply to implement performance-based assessments in place of the state's grade level tests. U-46 has been working with several districts of the Large Countywide and Suburban Districts Consortium to develop a bank of quality performance-based assessments and we would love to see Illinois earn the chance to pilot more innovative tests of student knowledge.

We know that as education leaders you are working diligently to develop the best plan for Illinois students. Thank you again for making a stop in our District last week. We appreciated your presentation and welcome the chance to review future drafts until together we develop a comprehensive plan to guide an innovative and equitable state education system for our more than two million K-12 elementary students.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Sanders". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Tony Sanders
CEO, School District U-46

School District U-46 ESSA Feedback

October 5, 2016

2.2 ACADEMIC ASSESSMENTS

A. Student Academic Assessments (iv.) (pages 10, 18, 68)

U-46 Response: On several occasions, there is mention of increasing the overall composite score for determining English language proficiency. Ideally, a committee would be formed to discuss this new determination as has been done in the past. The points to consider include:

- the rationale and implications for increasing the level, in other words what factors support this decision and the impact/outcomes for students, etc.
- the fact that the overall composite is a compensatory score with more weight on literacy, and thus at times may skew higher or lower, particularly if there is a large difference within the individual scores.
- as noted in WIDA's interpretive guide for ACCESS: "A student's individual performance in each language domain provides a more comprehensive and realistic profile than that from a single overall score."

E and F. Appropriate Accommodations and Languages Other than English (i-iii). (pages 12 - 13)

U-46 Response: The state acknowledges the need to "investigate and advocate" for assessments that demonstrates students' knowledge and mastery of the standards that is "not confounded by acquisition of a second language." Furthermore, the draft plan (September 2016) acknowledge the need for content-area tests in languages other than English, particularly Spanish. The question remains, in supporting TBE programs and as a state that has adopted and is promoting the Seal of Biliteracy and different pathways to attain it, including dual language programs, are native language assessments (i.e., Spanish for the majority of Illinois NEB students) being considered and what is the status?

More information is needed on what the PreK-2 school quality measure might be. While it states that it might not be ready in 2017-18, there is no indication of what is being considered. (pages 17 – 18)

Consider replacing PARCC grade 8 with PSAT 8/9 to allow for a broad growth metric for secondary.

- Students in Middle School should all take the same test (not Algebra I or 8th grade PARCC-Math) regardless of course schedule. The public needs to be able to compare all 8th grade students with the same measure.
- Increase of ACCESS cut score – Consider the impact of keeping students remaining in ELL programs longer. Is it more support or more isolation?
- SAT – Continue the practice of using the SAT test with essay for accountability purposes. The accountability should align to what matters most to families, including college entrance exams. We need to use the same test for the entire state.

3.1 ACCOUNTABILITY SYSTEM

U-46 Response: Should English language proficiency (K-12) be used as an indicator of student performance?

Should this be considered within the type and goal of the program? Additionally, will length of time/number of years in the TBE/TPI program (including whether or not a student is new to the country) be considered when looking at English language proficiency? (page 13)

State Plan, Page 14: *“The DLM-AA system is designed to map a student’s learning throughout the year. The system will use items and tasks that are embedded in day-to-day instruction that are aligned to the ILS. At end of the year, assessment will be created for states that want to include a summative test in addition to the instructionally embedded system.” (page 14)*

U-46: Will the state decide if everyone in the state will use summative assessments or will it be at the district's discretion or teacher discretion to administer the summative assessment?

- “Academic indicators,” numbers 5 and 6 of the *accountability workgroup* suggestions are important to consider, particularly within the context of the goals of the program, as mentioned above. The school climate should also include “culturally and linguistically responsive” as one of the indicators. (page 15)
- **Academic Indicators - need clear definitions** – this reads a bit more of a laundry list than policy document.
- Under this list, we would recommend removing Grades, Access to and completion of arts and enrichment coursework, portfolio indicator, socio-emotional. We recommend removing “teacher retention and engagement” until we pass a state equitable funding formula.
- We believe State should keep KIDS as that is an appropriate assessment, Spanish assessments should be implanted, and keep longitudinal data on students showing progress on ACCESS but remove “Former El.” In terms of “Consistency of test scores,” we recommend the State sign multi-year contracts so comparisons can be made over time.
- Many of the terms under “School Climate” and “Parent Engagement” are not clearly explained or defined. More information is needed regarding how “safe environment” or “wrap around support,” will be defined and measured. Under postsecondary readiness, many factors need to be better defined and measurements explained.
- College enrollment – is listed as an indicator. This should be tracked but as a post-secondary outcome measure and should not be listed as an academic indicator

- Other Non-academic indicators
 - a. Chronic absenteeism – not for accountability
 - b. Attendance, very important but should be in school climate
 - c. Expulsion and discipline policies – already in school climate
 - d. State Seal of Biliteracy – This should be listed as an academic indicator.
 - e. Mentorship programs, remove it
 - f. Early childhood education – this is academic
- College enrollment and earning an accredited certificate (like NIMS, CNA, NATEP etc) should count equally. Illinois needs to partner with these 3rd party organizations in order to obtain accurate data.
 - g. The National Student Clearinghouse needs more trade schools to be represented because many do not appear. Many cosmetology and beauty schools are in the National Student Clearinghouse but not the trades. It gives a false representation that females attend more post-secondary institutions than males. This needs to be considered when designing a “career-readiness” measure used for accountability or reporting.

4.1 SYSTEMS OF EDUCATOR DEVELOPMENT, RETENTION, AND ADVANCEMENT

A. Educator development, retention, and advancement systems (pages 33-34)

U-46 Response: The document/state references that all educator programs must align to rigorous standards (e.g. content standards, social-emotional standards, etc.) in order to “adequately teach **all** students.” Will the WIDA language standards be added in order to address ELs? Has the state discussed requiring educator programs to include coursework related to serving ELs, strategies, assessment, etc. and/or ESL/bilingual endorsements?

What is the science assessment, who is writing it? Is it NGSS aligned? How do we know? (page 31)

Why are only Math tests “trans adapted (directions, etc.)? If tests are not available in native language you are not measuring content knowledge but English proficiency which is already measured by ACCESS. (page 35)

Increased needs to be addressed in Professional development, but states Title II will be facing cuts? (page 36). Would like more information.

4.2 SUPPORT FOR EDUCATORS

A. Resources to support state-level strategies? (page 34)

Will the resources referenced (e.g. units and lessons) include Spanish resources for bilingual (Spanish/English) educators or other languages? Also, professional development programs should address ELs, it should be embedded in the PD offered overall for educator support.

A reference made to cutting Title II support. What will this reduction look like? Need additional information concerning MTSS frameworks. Are districts expected to provide PD for teachers around UDL? If so, to what extent? (page 35)

5.0 SUPPORTING ALL STUDENTS

U-46 Response:

- The reference to ACT Now Coalition quality standards for after-school care is an area that requires more information. (page 51)
- Additional information needed about the state commitment of engaging hard-to-reach families. (page 52)
- Education of Migratory Children requires more information. (pages 57 – 64)
- Concerned about the reference to specific assessments that seem to be in contradiction to the observational assessment the state promotes in preschool and kindergarten. (page 64)
- What is the timeline for MTSS frameworks and who is writing them? (page 57)

5.1 WELL-ROUNDED AND SUPPORTIVE EDUCATION FOR STUDENTS

U-46 Response: Although IL is a WIDA state, in the list of standards, the WIDA language development standards are not addressed (i.e. ELDS, SLDS, etc.) when discussing the standards-based approach by Illinois. As we're trying to align the standards and support all students with curriculum, this is important to include. (pages 41-42)

Where is the work that was done for the multiple measure index as a part of ESEA? It seemed as though these metrics were well thought out. It was organized and concise. You do not need many metrics if the ones available are quality. Remove the bonus which makes it sound like a game. Add measures for early childhood, and update some of the language. Include the State Seal of Biliteracy, attendance and a few of the other non-academic indicators mentioned here.

There needs to be a high school growth metric. This should involve one suite of assessments (College Board) that is given to 8th-11th graders. High schools need a minimum of two points to have a growth metric. The assessment should not be course-based.

ADDITIONAL U-46 RECOMMENDATIONS AND FEEDBACK

Finally, U-46 has reviewed the supplement not supplant language. As a district we would be considering option 2 or 4. We have great concerns based on the skeletal information given in the documents and via the webinar. There are more questions than guidance, which would make any review of the options problematic.

On Weighting – Student outcomes should account for **70** percent and school climate should account for **30 percent**. Accountability systems should be heavily weighted on reliable and valid metrics. The individual weights of components does not matter that much if the general philosophy is reflected.

Additional points on weighting:

- Academic achievement and growth should be equally weighted.
- EL proficiency should be half the weight of an academic indicator.
- Graduation rate should be equal to the academic indicators. An example is below:
Achievement 20 points
Growth 20 points

Graduation 20 points
EL 10 points
Climate 30 points

The purpose of any goal setting should be clear and directly tied to student achievement.

Aggregating Measures: Four levels would be more informative to avoid neutrality. The PARCC language should be clarified with greater description of levels of performance. The performance levels should be intuitive so a guide is not needed to interpret them. The language should be clear to allow for greater understanding by all stakeholders.

Illinois College and Career Ready Indicator Framework: Consideration must be given to outlining the use of GPA (Cumulative? Specific Course Inclusion?), providing clarity in explanation and understanding of the Readiness Composite Score, specification of the industry credentials that will be included, identification of pathways allowed, assessment interval window for inclusion of AP Exam data, grade requirements for AP courses, grade requirements for Dual Credit College English and/or Math courses, grade requirements for College Developmental/Remedial English and/or Math courses, grade requirements for Algebra II, score requirements for International Baccalaureate Exam, and the Seal of Biliteracy,

Consideration must also be given to outlining the behavioral and experiential benchmarks including: attendance, community service or military service, workplace learning experience, and Co-Curricular Activities.

###

Kathleen Wilkey, PhD
Assistant Superintendent of Instruction
Mokena Public Schools District 159

Colleen McKay

Jennifer Smith

Janice Taylor

EDEL 850

Section 2: Standards and Assessments (ELs)

1. Should Illinois introduce a new reporting category of former ELs to track the progress of students over time beyond four years?

Illinois should introduce a new reporting category of former ELs to track the progress of students over time beyond the four years. It is imperative that as a state we remain focused on evaluating the effects of the reclassification on student achievement and riven criteria it could be suggested that there is a misalignment between the services and/or settings provided for EL students. Obviously the ideal situation would be that there would not be a negative effect of a reclassification on student achievement and that there is a smooth transition from EL to a reclassified status, however, it is imperative that as educators we carefully consider the student’s linguistic needs and the services and/or settings provided to students.

2. Illinois has set a goal for third grade students to read at grade level. Along those lines, should IL adopt literacy assessments available in Spanish, to complement the current Spanish mathematics assessments?

Illinois should adopt literacy assessments in Spanish to complement the current Spanish mathematics assessment. In order to support the learner and gain the most reliable data, it is imperative that the state make every effort to develop assessments in languages other than English that are present to a “significant extent” in its participating student population.

3. How can Illinois address the technology divide that result in some districts lacking the proper infrastructure for online assessment, affecting administration of ACCESS 2.0, PARCC, the Dynamic Learning Maps Alternate Assessment (DLM-AA), and the Illinois Science Assessment?

Although ESSA pushes states to maintain their investment in education it has become the burden of school districts to troubleshoot the infrastructure divide. The lack of a high-quality infrastructure can shape student outcomes particularly in low income districts.

The federal government should make targeted investments in districts where this may be a problem.

4. Should Illinois change the N-size for subgroups to 20 to match the Illinois School Code statute on Bilingual Education? If yes, why? If no, why not?

ESSA does require states to use multi-indicator accountability system that includes the performance of all students and each student subgroup for each indicator. The subgroup classification has brought attention to the many longstanding concerns with regard to the validity and reliability of standardized tests for EL students. Since the EL classification is looked at as transitory for most students, this creates a state of flux as students move in and out of this classification. The subgroup of 20 does not seem reasonable in that the group may be fluid as to their level of English proficiency and their time in U.S. schools whereas the other subgroup classifications do not change.

5. Should Illinois raise the transition criteria for transitioning from services and EL status to align with the skills needed to meet state standards? If yes, why? If no, why not?

Illinois should raise the transition criteria for transitioning from services and EL status to align with the skills needed to meet the standards. Raising the transition criteria will remove the sink or swim placement of EL students in core subject areas, especially for those who have low levels of English proficiency. The other component that needs consideration is EL students often have little to no exposure to English-speaking peers and meaningful content instruction in English which may have a significant impact on a successful transition.

6. How much weight should English proficiency have in the accountability system?

English proficiency should carry weight in the accountability system. It may be wise to create a new category for EL students. It may be worth considering a value added method for teacher and school accountability and adjust accordingly either by not including the EL scores or an improvement of the validity and reliability through research-based accommodations.

7. What should the timeline for inclusion of ELs in the accountability system be?

The timeline should be established once education policy reflects equal access and outcomes for English learners (ELs).

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October 5, 2016

To Whom It May Concern:

Hello, my name is Erin Moore and I am the Director of Community Schools at Y.O.U. (Youth & Opportunity United) in Evanston, IL. We serve low-income youth and families with after-school and summer learning programs, community schools partnerships, and clinical and outreach services in eleven schools across Evanston and Niles Townships.

As a partner of four school Districts, Y.O.U. has a vested interest in the creation of an ESSA plan that supports alignment of our mission with that of our School District partners. I would like to take this opportunity to give input on the state's draft plan for ESSA. There are several places in the plan where the role of community schools could be expanded to support Illinois' youth and families and promote academic success and well-being.

3.1 Accountability System [pg. 20]

Equitable Accountability System

Recommendation: The state should include a concrete budgetary allotment dedicated to parent engagement activities linked to metrics and outcomes. Districts and individual schools must be accountable to families for the outcomes of all students. Schools can create Parent Advisory Committees and recruit families from different vulnerable subgroups (such as EL students, special education students, and foster youth) to analyze school-wide data and take part in school improvement decision-making.

It is also important to invest in the human capital necessary to perform successful outreach to hard-to-reach communities. A Community School Coordinator or Manager is instrumental in performing outreach and leveraging resources to meet parent engagement goals.

3.2 Identification of Schools [A. Comprehensive Support and Improvement Schools, ii. pg. 23]

Is growth in the "all students" group sufficient or must there be growth for underperforming student groups as well?

Recommendation: Growth for underperforming students should be required as a component of a statewide strategy to prevent bubble syndrome and promote engagement of hard-to-reach families. Furthermore, authentic family engagement should be one of the metrics on which the state tracks progress. The state should design guideposts for how to engage communities in needs assessments, asset maps, and school-wide plans with the goal to improve outcomes and mitigate or remove nonacademic barriers to success for consistently underperforming groups.

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4.2 Support for Educators [A. Resources to Support State-Level Strategies, pg. 34

Recommendation: The state plan should prioritize professional learning opportunities that support teachers in engaging parents and communities as partners in education. Principals also need professional development that builds their capacity in developing cross-community partnerships and creating a structure of shared decision-making with parents and community members. Parent engagement is often avoided or ignored because schools don't have the tools or strategies to implement effective outreach and services for families. The community school model provides a structure that principals can use to accomplish these goals.

5.1 Well-Rounded and Supportive Education for Students [E. Parent, Family, and Community Engagement, pg. 51]

Recommendation: The majority of community schools in Illinois utilize Title IV, Part B 21st Century Community Learning Center funding. Many grants are used for community schools. As such, the state should include Community School standards in the ESSA plan in addition to ACT Now standards as a tool to support districts in combining classroom changes with wraparound supports that remove barriers to academic success.

Furthermore, the state should take advantage of grant opportunities available through Title IV, Part E of ESSA to establish a state-wide system of school-based resource centers for youth and families.

ESSA provides Illinois with the opportunity to create a comprehensive vision of success for children and youth. In the implementation of ESSA, we hope that ISBE includes nonacademic measures of success, and recommends structures for family and community engagement with schools. The community school model offers an infrastructure that would support Illinois districts and schools to achieve these goals.

Thank you for the opportunity to engage with ISBE in the creation of an ESSA plan for Illinois, and I look forward to continuing to engage as the plans are formalized and adopted.

Sincerely,

Erin Moore
Director of Community Schools
Y.O.U. (Youth & Opportunity United)
emoore@youthopportunity.org
(847) 866-1200 x251



**FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

The YMCA of Metropolitan Chicago Comments and Recommendations on the Every Students Succeeds Act State Plan Submitted to ISBE on October 7, 2016

The YMCA of Metropolitan Chicago partners with schools to intentionally embed learning supports in out-of-school time programs for youth from early childhood through school and into college or career. Through formal and informal assessments and a comprehensive method for evaluation, the Y tracks the development of academic skills, attitudes, and resources.

The YMCA of Metro Chicago partners with ISBE and/or Chicago Public Schools (CPS) in the following areas:

- **Early Learning:** The YMCA's Early Head Start/Head Start program receives Prevention Initiative and Preschool for All funds through the City of Chicago's Department of Family and Support Services. Our program also receives USDA Child Nutrition dollars directly through ISBE.
- **Community Schools Initiative:** The YMCA's Community Schools receive Title IV or 21st Century Community Learning Center grants to operate high-quality out-of-school programming at 10 schools.
- **Youth Safety and Violence Prevention (YSVP):** The YMCA partners with CPS to provide trauma-informed programs and services for at-risk youth.

Recommendations and Comments

In the State Plan, ISBE requested ideas from individuals or groups regarding how funding streams can be combined in order to support each and every child as she or he progresses through school. Follow are our recommendations.

Early Childhood Education

The Y's Early Education and Care (EEC) program carefully braids state and federal dollars to ensure a full day of quality care to children from low-income families in neighborhoods with higher rates of crime and violence. EEC receives funds through ISBE for Prevention Initiative, Preschool for All and Child Nutrition. We also receive federal Head Start funds through Chicago's Department of Family Support Services and Child Care Assistance Program dollars through the Illinois Department of Human Services.

It is critical that the "The Early Learning Council" and other groups composed of government agencies and varying levels of government meet to discuss areas of funding in jeopardy because funding shortfalls result in a domino effect for providers and families. For instance, the freeze in the Child Care



**FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

Assistance Program last year jeopardized our ability to provide early learning services to low income families.

After School

The Y recommends the integration of Title I funding with local resources to enhance the Community School Manager/Resource Coordinator position. An increased investment will enable these positions to establish the partnerships necessary in the school and in the community to create the robust neighborhood hub that community schools are meant to be. It will also allow the Y and other Illinois community schools to increase our investment in evaluation to ensure program quality, as well as technical assistance.

Trauma-Informed Services

The Y is encouraged to learn that ISBE will support local school districts to implement evidence-based practices for improving academic, social, emotional, behavioral and physical student outcomes and as part of that work to create trauma-informed environments. The YMCA's Youth Safety and Violence Prevention initiative is a comprehensive trauma-informed approach to violence prevention that looks at past exposure to trauma as a main driver of future dangerous behaviors. We offer our support and consultation on initiatives to integrate trauma-informed practices for school staff as well as on how to better partner with community-based organizations with expertise in this work.

YMCA Programs noted in Recommendations

Early Childhood Education

The Y serves 1,000 birth to five year olds at 24 sites across the Chicago region including 13 Early Head Start/Early Head Start sites in Chicago. The Y's early childhood education programs have worked to establish consistent and high-quality teaching standards that raise the bar for early learning classrooms. This includes meeting the "Gold Standard" in the statewide quality recognition and improvement system, ExceleRate Illinois. In addition, the Y recently secured a \$1.4 million grant awarded from the Robert R. McCormick Foundation to implement and expand the "Y Essentials Quality Initiative" which drives quality improvement in critical early-learning education programs for infants, toddlers and preschoolers.

YMCA Community Schools Initiative

The Y's Community Schools Initiative collaborates with CPS and other organizations to provide high-quality out-of-school-time programs and services at 10 K-8 CPS partner schools located in underserved communities. The Y currently has 734 CPS students enrolled in the Y's Community Schools Initiative. The YMCA currently operates Community Schools through Title IV's 21st Century Community Learning Center grants, Community Development Block Grants, as well as support from the United Way.



**FOR YOUTH DEVELOPMENT
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Closing the Achievement Gap

Evidence shows the Y's Community Schools Programs close the achievement gap. The Y worked with the University of Chicago's Chapin Hall Collaborative and five other Chicago-based nonprofit and public organizations to provide evidence of the positive impact the Y's programming has on youth and families.

Through this collaborative we have discovered that the Y's Community Schools are helping to close the achievement gap for low-income CPS students. Here are some of the outcomes seen during the 2014-2015 school year.

- Youth in Y programming performed significantly better than their peers at the same schools on standardized tests. For the Illinois State Achievement Test in math, 52 percent of Y youth met or exceeded standards, compared with just 39 percent of their classmates. For the ISAT reading test, 43 percent of Y youth met or exceeded standards, compared with just 32 percent of their classmates.
- On the Northwest Evaluation Association (NWEA) math test, Y youth and their classmates started in similar places. But over the course of the year, the proportion of Y youth meeting or exceeding standards rose by 27 percentage points, compared with 14 percentage points for their classmates. For the NWEA reading test, the proportion of Y youth meeting or exceeding standards rose by 22 percentage points, compared with 16 percentage points for their classmates.

Youth Safety and Violence Prevention

The YMCA of Metro Chicago's YSVP initiative is a comprehensive, trauma-informed approach to violence prevention that looks at past exposure to trauma as a main driver of future dangerous behaviors. Everything we do is designed to help our region's most vulnerable young people become leaders in their own communities. The following programs are offered by YSVP:

URBAN WARRIORS

- Post-9/11 military veterans mentor youth who have experienced high levels of trauma
- 16-week evidence-informed curriculum featuring innovative practices
- Increases coping skills, social support and future orientation

BRIDGING THE DIVIDE

- Outreach workers and volunteers facilitate peace-making conversations between police officers, opportunity youth and other community members through an interactive toolkit, cafés, peace circles and story sharing
- Operating in six Chicago Police Department districts in high-crime neighborhoods
- Increases mutual understanding and empathy between police and youth



**FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
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STORY SQUAD

- Narrative therapy for youth through audio and music production opportunities
- 16-week structured curriculum
- Strengthens critical thinking, personal mindset and verbal communication

RESTORING INDIVIDUALS THROUGH SUPPORTIVE ENVIRONMENTS (RISE)

- Community-based diversion program for justice-involved youth
- 6-month leadership development program, case management and community projects
- Increases leadership skills and goal attainment, reduces recidivism

Contact

DaWana Williamson, Senior Vice President, Youth Development

YMCA of Metropolitan Chicago

312-440-2410

dwilliamson@ymcachicago.org

October 12, 2016

Dr. Tony Smith
Illinois State Board Of Education
100 W. Randolph, Suite 14-300
Chicago, IL 60601

Re: Comments to ESSA State Plan Draft #1

Dear Dr. Smith:

The below comments are being submitted by the ED-RED Executive Board, Education | Research | Development (**ED-RED**). As you know, ED-RED is a coalition of nearly 90 school districts, special education cooperatives and Intermediate Service Centers in suburban Cook, Lake and DuPage counties in the Chicago, Illinois area. ED-RED monitors and educates its membership on State and Federal education policy issues, particularly issues of priority for our member districts.

On behalf of our member districts, we appreciate ISBE's commitment to offering various avenues for stakeholders to provide input on Illinois' ESSA State Plan, including the ISBE Accountability Working Groups that met over the summer, numerous state-wide listening sessions and the opportunity to provide input on Draft #1 of the ESSA State Plan, as well as on upcoming drafts of the State Plan.

We also appreciate your commitment to ensuring that Illinois' State Plan contemplates the "whole child" and that we take a "holistic, yet common sense" approach to our work. To that end, we have worked with our membership to identify those areas where there is some consensus within our membership over the State plan. As you can imagine, there has been some disagreement over some of these areas even within our membership. For that reason, we noted those areas where there the majority of our districts agree on a particular issue, yet additional dialogue needs to occur over the next several months to more fully and thoroughly develop ED-RED's position on that issue.

ED-RED Comments to ESSA State Plan Draft #1

1. Student Academic Assessments

We support ISBE's decision to move from PARCC to the SAT for high school juniors in the 2016-17 school year and thereafter. However, concerns remain over the continued use of PARCC to assess ELA and mathematics in grades 3-8. It is critical that there be continuity and alignment between the assessments administered in elementary and secondary grades. It is also essential that assessment results in these early grades provide timely and meaningful feedback to schools and parents.

The PARCC test administered in grades 3-8 has not fulfilled its initial promise of providing our elementary schools with the meaningful data that they need. However, we acknowledge that our districts having recently received preliminary data from PARCC. While this has helped, serious improvements to PARCC are still necessary and timeliness of results remains a concern. Additionally, the initial problems with PARCC implementation and concerns over how meaningful PARCC data results are have eroded our school communities' trust in this assessment. We would note that these concerns have led to increased opt-out rates in many of our districts.

PARCC also fails to provide high school districts with adequate predictors of the required level of academic rigor that students will need at the secondary level. This has led to additional testing of students instead of less testing. It is this need for continuity between the grades that is critical and we must find an assessment for elementary feeder districts that adequately measures progress through a student's transition to high school.

Because we recognize the need for consistency from year to year in the administration of a State assessment, we do not make the recommendation to reconsider PARCC lightly. However, we feel it is critical that ISBE identify a test that can meet the above criteria and that such a test is implemented in grades 3-8. At this point we are unable to recommend a specific test that should be chosen, but would urge ISBE to research and consider the K-8 assessment that SAT is in the process of developing, the NWEA MAP test and/or any other assessment that meets the above criteria. Once such an assessment is identified, we need to use this assessment over a period of time so that we are able to use the data in a meaningful way that allows us to measure student growth.

Finally, we also feel that is important for ISBE to provide support services for all districts so that our teachers are able to address the rigor of the new Illinois Learning Standards and help students better demonstrate their understanding of these Standards.

2. Student Academic Assessments – Mathematics Testing On-line

In the event that ISBE continues administering PARCC (in the short-term or long-term), or chooses another test that can be administered to students on-line, we recommend that for any questions that require students to demonstrate their mathematical thought process, students be provided with the option of writing down their mathematical thinking in written format. Currently, students taking their tests electronically must also show their work electronically. A written option is particularly important for students in grades 3-8 who are regularly encouraged to show their thought process on paper. While some of our districts have been able to incorporate technology into their mathematics curriculum, for schools where this has not occurred, students may be at a disadvantage when testing.

However, we would want to ensure that these written documents are being used for evaluation and assessment purposes so that students can earn credit for their demonstrated thinking, reasoning and modeling. Otherwise, the administrative oversight required for a written option would not be worthwhile.

We understand the convenience, cost-effectiveness and efficiency that computer testing has the potential of providing us at some point in the future, but the ability of a student to show his or her mathematics work simply does not translate to computer testing for many of our students. In fact, it can be extremely confusing and problematic for our students. If they are being assessed and evaluated for their thought process, we need to provide them with realistic options for doing that successfully.

3. EL Proficiency and Accommodations

Students are currently assessed for EL Proficiency using ACCESS, with proficiency levels being: overall 5.0, reading 4.2 and writing 4.2. We support the continued use of the ACCESS test and would note that the test also contains descriptors of what the student “can do” which makes the data received from the test important when grouping and differentiating instruction among students. While attainment of English proficiency must continue to be measured for purposes of receiving full EL supports, we support emphasizing growth for accountability purposes. Additionally, any growth

accountability measure must recognize what amount of growth is reasonable, particularly given the grade level of the student when he/she enters the school, as growth tends to be slower as students advance in grades.

4. EL Proficiency and Accommodations

Some schools have high levels of enrollment in one specific language and choose to utilize dual language programs. In these cases, we recognize that research suggests that there may long-term benefits for those students to take longer to exit from the EL program, as they work to strengthen their native language skills and later apply those skills to the English language. However, the majority of our schools do not offer dual language programs for a variety of reasons. Additionally, many of our districts encompass multiple languages (some have up to 90 different languages spoken within their district). Therefore, it is in the best interests of these students to help them progress towards English Proficiency as quickly as possible.

We would recommend ISBE also consider the following as it relates to this area:

a. Transitional EL supports

While we continue to study whether the above ACCESS scores should be increased/decreased, the majority of our schools understand that EL students who have acquired English Proficiency status may continue to need transitional supports after they exit the program. Many of our districts provide these supports despite the fact that funding ceases once these students exit the EL program based on the current ACCESS “proficiency” scores. We would support continued funding at some level to support these students who are deemed EL proficient (yet fall below the 6.0 score in some or all of the domains and overall score) as they become mainstreamed. This would also serve to dis-incentivize schools from keeping students in the EL program longer than necessary for funding purposes.

b. Over-Identification

In some cases, our districts have experienced EL students, particularly younger students, being over-identified and placed in the EL program because, due to their limited writing skills rather than limited English skills, they are unable to meet the 4.2 writing score required for proficiency (while meeting the overall

and reading scores). We want to ensure that the students testing into EL programs are being tested for just that, their need for English Language supports, and not confused with the needs for other supports (i.e. writing).

c. Seal of Biliteracy

We encourage and support districts utilizing the Seal of Biliteracy to further recognize and reward dual language skills.

d. State Assessments

Currently, first year EL students do not have to take the State Assessment (i.e. PARCC, SAT, etc...). We understand the importance of testing and collecting data for all subgroups. However the first year waiver is a recognition that the assessment will not be meaningful (and in fact can be extremely frustrating and a waste of instructional time) if the student has not acquired a certain level of English Proficiency. Conversely, some students may be capable of taking the State Assessment within that first year. This seems to be an area that Illinois could be proactive in working at the federal level to ensure that only EL students for whom the State Assessment will provide meaningful data are taking the test.

5. Local Choice Option to Allow any Nationally Recognized College Entrance Exam

We oppose a local choice option allowing districts to choose between different college entrance exams for use as the ESSA-designated State Assessment. Allowing such an option would make it difficult to compare data across districts. The procurement process is designed to allow ISBE to award a contract to the lowest responsible bidder that will provide the best universal testing option to all of our students in the State. We believe that process occurred with the recent bidding process and led to awarding SAT the contract. Therefore, SAT should be the college entrance exam that should be universally used by all schools in Illinois for purposes of the ESSA accountability measure for student assessments. This will help ensure equitable access for all Illinois students to learning experiences, outcomes and opportunities.

I would note, however, that a few of our member districts have indicated that they do support the local choice option.

6. Indicator of School Quality and Student Success

We recognize that several options are currently being considered for these indicator(s). While we continue to investigate what indicators we would like to see included in the State Plan, we would recommend the following:

- a. All indicators selected should align with policy priorities of our State and all stakeholders should continue to be a part in the development of those priorities.
- b. Indicators should not serve to penalize districts that lack sufficient funding to provide opportunities or services to students. ED-RED, along with other stakeholders, has done extensive work on the evidence-based funding model in which the amount of funding needed for each district to provide adequate educational services and programs for all of its students is identified. Until Illinois demonstrates a commitment to funding those necessary educational services and programs for all districts, we should not choose indicators in which districts are unable to implement appropriate research-based interventions to improve on those indicators due to lack of funding.
- c. Once indicators are selected, ISBE should continue to work collaboratively with stakeholders to identify what specific data points best measure each of those indicators.
- d. Any College and Career Readiness indicator should reflect the “Redefining Readiness” work that District 214, in conjunction with the AASA, has done in this area and ensure that a student’s ability to achieve College Readiness or Career Readiness is recognized. This work is national, research-based work which reflects a future look at what students will be expected to do once they leave high school. We believe that the definition of College and Career Readiness adopted by ISBE at its September board meeting is too restrictive and will not serve the interests of our schools and its students.
- e. ISBE should collaborate with those elementary districts, and possibly a reputable research university, that are working to identify “readiness” measures that could serve as a valuable indicator at the elementary levels.
- f. All indicators should use meaningful measures that demonstrate evidence of student learning and student growth. However, we need to identify a growth model that does not penalize high performing districts if the growth index at any given time is not meeting a target. This is critically important since it is not in the best interests of these students to unnecessarily accelerate content in order to demonstrate growth. Depth of learning is also critical and must not be compromised in an effort

- to accelerate content for the sole purpose of demonstrating student growth for State accountability purposes.
- g. Whether and to what extent proficiency should be included in both academic and non-academic indicators is an area where we need to engage in additional dialogue with our membership. While our membership feels that the State Plan must emphasize growth measures over attainment of proficiency, some feel that there is still a place for proficiency within the Plan. What is clear, however, is that our membership does not want to revert back to NCLB's reliance on unrealistic proficiency goals and the punitive consequences for a districts' failure to meet AYP or another measure of interim progress.

7. Meaningful Differentiation of Public Schools and Weighting of Indicators

ESSA requires that the State Plan meaningfully differentiate all public schools in the State. Additionally, each State must identify a methodology to identify schools for comprehensive support and improvement which identify (1) the lowest-performing 5% of schools; 2) high schools failing to graduate 1/3 or more of their students; and chronically lowest performing subgroups.

We acknowledge that the proposed Federal Regulations require at least three distinct levels of performance for schools for each indicator, as well as an overall summative rating for each school. However, we oppose this requirement and believe that the proposed Federal Regulations are in conflict with the intent of ESSA. On August 1, 2016, we provided the U.S. Department of Education with comments reflecting that the Federal Regulations should not require this in State Plans.

We recommend for a "dashboard" approach to meaningful differentiation that includes the broad spectrum of accountability indicators required by ESSA and measures each school's periodic growth on each of those indicators. While the simplicity of a summative rating can be appealing, ESSA provides us the opportunity to create a more complex accountability system that rewards schools for what they are doing well, but also identifies areas of needed improvement. This can be accomplished through a "dashboard" approach. We are committed to working with ISBE on the best way to identify the lowest-performing 5% of school and the chronically lowest performing subgroups through this approach. Additionally, by using such an approach to meaningfully differentiate schools, it seems that it would unnecessary to provide weights to each of the indicators.

In the event that levels of performance for each indicator and a summative rating are required, we will provide comments at that time.

8. Long-term Goals and Interim Measures of Progress

ESSA provides an opportunity for each State to develop its own ambitious long-term goals. We believe that the best way to set these long term goals is in a way that utilizes student growth rather than attainment of proficiency as appropriate measures for district accountability. As noted above, however, we intend to engage in additional dialogue with our membership as to the role of proficiency in the State Plan, as some districts feel that both growth and proficiency should be accounted for in the Plan. Districts have limited control over the level of proficiency and readiness with which a student arrives at their schools. Yet our schools do have responsibility for educating those same kids once they enter our doors. No Child Left Behind left behind a legacy of punishing districts for their inability to reach a certain level of proficiency, regardless of how much growth was achieved.

We recommend setting goals for our schools that highlight and reward districts that are able to achieve gains in student growth over time, although in some cases may still fall short of proficiency. Conversely, those schools that fail to see sufficient growth over time will be able to utilize appropriate interventions to address their specific issues. Because it is so important for our schools to analyze the data in order to determine why or why not growth has occurred, it is critical that stakeholders be included in discussions over the specific data points used to measure each indicator.

We also recommend that each school have an individual growth plan specifying what amount of growth is appropriate for that district and that student growth be measured over a period of time. This approach will also serve to encourage the education of each and every student and avoid the issue of “bubble kids” that arose under NCLB.

9. Long Term Goals

Based on the above reasons, we do not think that the ESSA State plan should utilize the long-term goals that ISBE adopted in 2015 (i.e. 90% or more 3rd grader students at or above grade level, 90% 5th grade students meet or exceed expectation in mathematics), as these goals are based solely on proficiency and not student growth. In the event that ISBE determines that some long term goals should be incorporated into the State Plan that are based on attainment of proficiency, we feel that it would be necessary to

include qualifiers and descriptors around who should be included within these calculations, specifically accounting for the unique needs of students with limited English Proficiency, limited previous school experience, significant disabilities and/or other measures that would unfairly penalize schools for not reaching a proficiency target.

10. Student Growth Model

As it relates to the above discussion points on student growth and the model used, we recommend ISBE consider using: 1) the average of the previous three (3) years of data in order to account for unexpected changes (i.e. specific population changes); and/or 2) the same cohort of students to measure growth on any indicator, if feasible and appropriate.

CEC thanks ISBE for an opportunity to share ideas in response to the questions posed in the first draft of the state ESSA plan. Our comments are focused on Section 3 - Accountability, Support and Improvement for Schools. While not asked directly, we wish to briefly mention:

1. As it relates to the timeline for identification and notification of schools for SY 2017-18 in 3.2, the sooner the better in order to have sufficient time develop a strong plan and prepare for implementation. SIG Cohort 6 has benefited tremendously from planning and preparation time.
2. The importance of strong school leadership cannot be understated. Illinois should strongly consider utilizing the Teacher and Leader Academies program opportunity in Title II to support the preparation of candidates for high-needs schools with a year-long residency or similar supports. If possible or needed, consider partnering with other states.
3. When ISBE considers more rigorous action for schools not exiting comprehensive status, consider requiring the implementation of a broader approach instead of a narrow prescription to turnaround efforts. Follow examples like full service community schools and Promise Neighborhoods in Title IV to generate deeper community engagement, expansion of access to quality early childhood experiences, mental health services, social services targeted to family needs, and out-of-school time opportunities.
4. In order for schools to improve, the district (system) of which they are a part must also improve. A plan and commitment from the district to support the school and make the necessary changes to enable school improvement. All district policies and practices that may contribute to low or high performance should be examined.
5. Any school improvement strategy should at its foundation begin with labor-management collaboration. In order to plan, implement and sustain the difficult improvements required, a strong commitment to work collaboratively by the labor and management will increase the likelihood the improvements are deep and durable.

3.1 ACCOUNTABILITY SYSTEM.

ISBE requests ideas from individuals or groups regarding both additional school quality indicators and other ideas as they relate to additional school quality indicators (e.g., why a particular indicator makes/does not make sense within an accountability system).

A school climate / culture survey is a worthwhile indicator of school quality. Most such surveys (like the 5Es) are correlated to school improvement. The surveys can be administered in all schools so would be nearly universal in application. Also important, the surveys can be influenced by schools.

3.2 IDENTIFICATION OF SCHOOLS

A. Comprehensive Support and Improvement Schools.

Should Illinois identify the lowest-performing 5 percent of schools first, and then identify high schools with a four-year graduation rate of less than 67 percent? Or should the state identify high schools first, then calculate a lowest-performing 5 percent from the remaining pool? Alternate methods will either increase or decrease the number of schools identified.

As stated in the ISBE ESSA draft, there will always be a lowest 5% of schools. Method 1 produces a smaller number of schools identified which concentrates the available resources. Concentrating significant resources in fewer schools, instead of spreading them out, would ideally increase the chances of success of the lowest-performing 5%. If more schools in the lowest 5% successfully exit, they can provide examples for others later identified in the lowest 5% or those schools at-risk of being identified. Additionally, the first method allows more elementary schools to receive significant funds, which did not receive funds until Cohort 5 (of 6) of SIG.

How many years (up to four inclusive of a possible planning year) should schools with a student group whose performance is on par or lower than the performance of the “all students” group in the lowest-performing 5 percent of schools have to implement a school improvement plan before it is identified as requiring comprehensive supports and services, and why?

Significant improvements in student outcomes typically follow years of smaller improvements in local assessments and other measures like attendance or graduation rates. It would make sense to allow 4 years which aligns with the requirement / allowance for schools identified for comprehensive support. Schools in which student group(s) are not achieving, as opposed to the whole school (in the case of comprehensive), does not likely simplify the work required or shorten the time needed to improve. Attempts to address student groups will need to be “comprehensive” at the school level as the student groups are part of a whole system (school and district) that may need to make changes in its practice in order to improve the results for identified student groups.

Alternatively, providing more support or intensified monitoring prior if progress is not made in the first two years could be an option. For example, if schools do not see improvements within two years, ISBE or external partners could provide greater accountability, increased supports, more frequent monitoring, and greater decision-making authority.

With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not?

One method could ensure that students are, at minimum, on a trajectory to ensure college and career readiness. Allowing schools to set their own targets is preferable to externally generated targets.

Another method could be that the student subgroup(s) must make progress to be on track with all students by the end of the four year process. This is more feasible for schools and would

ensure achievement gaps closed over time. However, this could still allow all students to underachieve as long as the entire school is not performing in the lowest 5%.

Should there be minimal required amounts of growth (beyond the requirement to no longer meet the criteria for identification)? If so, what amount of growth would be sufficient? If not, why not?

We agree with the ISBE position that definition of increased student outcomes should be aligned to the totality of the state's accountability system, not a single assessment or measure. Growth and achievement should be considered. For consideration, the trajectory of growth should put the students on track to graduate college and career ready.

Is growth in the "all students" group sufficient, or must there be growth for underperforming student groups as well? If "all students" is sufficient, why? If growth for underperforming groups is necessary, why so?

Schools and districts should be using strategies that support all students, including strategies that may only focus on the underperforming groups. For schools identified for comprehensive supports, both "all students" and underperforming subgroups should be considered; The school could exit comprehensive supports if all students improve, but could then move into targeted supports if student groups are not meeting requirements. The school must understand that exiting comprehensive supports to targeted supports is a possibility.

How should these exit criteria support or hinder progress toward the state long term goals and measures of interim progress?

The trajectory of growth should put the students on track to graduate college and career ready. Exit criteria should align to state long term goals and measures of interim progress.

What, if any, additional exit criteria should Illinois use? If so, what criteria and Why?

The presence of a long-term plan to sustain growth and improvements in achievement after exit should be developed by the school prior to exit. This long-term plan would include: a theory of action, measureable goals, aligned strategies, progress monitoring plan, and action items with timelines, deliverables, and person(s) responsible, and rationale for sustainability. This long-term plan must also maintain the same expectations of the original plan while addressing how the school intends to ensure sustainability with (eventual) reduction in funds.

Also, if a school is able to exit, it should NOT result in a total loss of funding and other supports. Successful exit should create an opportunity for tailored or targeted funding to continue or deepen initial improvements.

B. Targeted Support and Improvement Schools

ISBE requests stakeholder input into the aforementioned definition and response to the following question:

For how long should a student group be underperforming before it meets the definition of “consistently underperforming”? The proposed regulations suggest identifying schools with these student groups every two years. What might the intended and unintended consequences of such a timeline be?

Identifying the schools with consistently underperforming student groups every 2 years has the advantage of not allowing underperformance to persist, while still using multiple years' data to avoid misidentification of one year anomalies or outliers.

However, the cycle for *action* would be better as 3 or 4 years so that new groups of schools are not piling on to the already identified group working through a 4 year cycle. One consequence of a tighter timeline might be that too many schools may be identified, making the list too long. If it is possible to identify schools *without requiring mandated action*, simply identifying schools might be useful to provide some urgency without diverting scarce state resources.

The state’s methodology for identifying additional targeted schools with low-performing subgroups of students.

EXAMPLE: Methodology for identifying additional targeted schools:

- 1. Identify schools that meet the criteria for comprehensive supports and services.*
- 2. For each of the identified schools, identify the highest performance level on the state accountability system.*
- 3. Compare individual school disaggregated data against the values identified in step 2.*
- 4. Notify any school where one or more subgroup is at or beneath the performance level identified above.*

ISBE requests stakeholder input into the aforementioned methodology. For example, does it make sense in the context of identification of comprehensive and targeted schools?

This explanation requires greater explanation and clarity. The second step, in particular, is not easy to understand. The methodology makes sense as best can be determined from the information presented. One key would be for the subgroup comparisons to be made at the subgroup level and not the “all students” level if regulations allow.

For Step 2, the highest performance level should be an academic measure(s). As written it is not clear. Step 2 may not identify all student subgroups and/or achievement gaps and thus under-represent the number of schools identified for targeted support. Step 2 may be better to address the greatest area of need of the school, rather than an area in which it performs highest, to ensure the needs of student groups are met.

Additionally, examining each academic area, rather than just the highest performance level, would identify all achievement gaps, and then for manageability purposes, the greatest gap could be targeted for supports.

The uniform exit criteria for schools requiring additional targeted support due to low performing subgroups established by the state.

ISBE invites stakeholder response to the following questions:

With respect to the definition of improved student outcomes, should improvements in achievement be required, or is increased growth sufficient? If so, why? If not, why not?

One method could ensure that students are, at minimum, on a trajectory to ensure college and career readiness. Allowing schools to set their own targets is preferable to externally generated targets.

Another method could be that the student subgroup(s) must make progress to be on track with all students by the end of the four year process. This is more feasible for schools and would ensure achievement gaps closed over time.

Should student group performance on relevant indicators be compared to state averages for the “all students” category or the comparable student group? Why?

All. This would ensure that the achievement gap is being closed within a school.

Should there be minimal required amounts of growth (beyond the requirement to no longer meet the criteria for identification)? If so, what amount of growth would be sufficient? If not, why not?

It makes sense to include a growth requirement so that the school is more likely on a path towards sustained improvement, rather than risk that in a year or two, the school would be identified yet again. Also, if a school is able to exit, it should NOT result in the loss of funding and other supports. Successful exit should create an opportunity for tailored or targeted funding to continue or deepen initial success.

How should these exit criteria support or hinder progress toward the state long-term goals and measures of interim progress?

Exit criteria should align to state long term goals and measures of interim progress.

What is the appropriate timeline for improvement of performance of underperforming student groups?

4 years. Literature on systems change and school turnaround suggests a five-year minimum timeline, which is not presently an option under the law.

What, if any, additional exit criteria should Illinois use? If so, what criteria and why?

The presence of a long-term plan to sustain growth, improvements in achievement, and meeting the needs of subgroup(s) after exit should be developed by the school prior to exit. This long-term plan would include: a theory of action, progress monitoring plan, measureable goals, aligned strategies, and action items with timelines, deliverables, and person(s) responsible, and rationale for sustainability. This long-term plan must maintain the same expectations of the original plan while addressing how the school intends to ensure sustainability with (eventual) reduction in funds.

Also, if a school is able to exit, it should NOT result in the loss of funding and other supports. Successful exit should create an opportunity for tailored or targeted funding to continue or deepen initial success.

3.3 State Support and Improvement for Low-performing Schools

A. Allocation of School Improvement Resources. Describe the SEA's process for making grants to LEAs under section 1003 of the ESEA to serve schools implementing comprehensive or targeted support and improvement plans.

ISBE requests stakeholder response to the following questions:

How should the state define "greatest need"?

Greatest need may not be worth defining. However determining how to prioritize could be useful. The schools in greatest need, or rather those that should be prioritized, may include the following:

- Historical chronic underperformance
- Chronic underperformance of subgroup(s)
- Persistent achievement gaps
- Greatest disparity in terms of achievement gaps
- Greatest underperformance (bottom 1% compared to bottom 5%)
- Disparities within district

However, if greatest need is identified in this manner, then ISBE may be identifying schools with little readiness (i.e. commitment or will) to improve, rather than focusing on schools with greater potential to improve. Readiness should play a significant factor in the identification of schools.

Which should be prioritized, districts with the highest concentrations of identified schools or highest numbers? Why?

Choosing between the concentration or highest number of school is not a productive distinction. Concentration favors smaller districts. Total number of identified schools favors larger school districts.

What are practical ways for the state to include practitioners and stakeholders in the creation of a state formula and/or instruments that evaluate the quality of an improvement plan?

Stakeholder and practitioner input could be best used to evaluate improvement plans. Stakeholders from previous SIG schools, schools that have shown improvement or extraordinary achievement (e.g. successful SIGs, successful RtT, Blue Ribbon schools) could help develop the evaluation criteria/instrument. Practitioners, such as external partners, could help develop and review the potential instrument. There are many publicly available instruments from other states or organizations.

How should the state define and measure “readiness” and “strongest commitment” to implement change?

Readiness should be based on evidence from practice and research that identifies factors most likely to contribute to sustainable improvements for students.

Leading candidates for readiness and commitment include:

- Detailed diagnostic data (needs assessment) on the root causes of low achievement
- Detailed plans to use a small number (2-5) of targeted, critical strategies to address low achievement
- Commitment separately and together from the school board, district, union, and school to the small number (2-5) of strategies including the role each will play in supporting the strategies - i.e flexibility, changes in current practices
- A plan that includes implementation, outcomes and monitoring associated with the small number of strategies
- A building leader who demonstrates the competencies of a turnaround leader
- In addition to student academic learning, the plan demonstrates attention to student and teacher culture & climate, student non-academic needs, and family and community engagement.

ISBE requests stakeholder response to the following question:

What are the challenges of which ISBE should be aware in regard to the identification and implementation of “evidence-based practices”?

Evidence-based practices are important to ensure that districts and schools have considered what research can tell them about how they choose practices to address their needs. Just as important is to use the research to inform the implementation of practices. Once the practices are chosen, it is most important to consider the local context and needs for successful implementation.

As recommended by a [recent report](#) from the Center for American Progress, it may not be as important to create a set list of evidence-based practices, but rather for ISBE to provide support for districts and schools to select and implement practices that match their specific needs. A pre-ordained list may narrow the options and choices for a district and school too soon in the process. It is ultimately more important that the strategy fits the site-specific issues and a sound plan for implementation has been developed. A practice with a strong basis in evidence is not useful if it is not put in local context and poorly implemented.

CEC recommends that ISBE look at best practice exemplars of institutional support systems used by districts and schools to match their needs with possible evidence-based practices. National level evidence-based practice learning resources like the [What Works Clearinghouse](#) are making efforts to improve search capabilities and data warehousing that enables schools to find niche interventions and case studies that fit their context.

Districts and schools, particularly low-performing schools, often do not have the research capacity to adequately diagnose their own needs, find relevant evidence-based practices, fit possible interventions to their context, and evaluate the effectiveness of practices. ISBE might consider piloting a state-based implementation or policy-to-practice educational team that would be directly accountable to the state. This could be in concert with activities to boost the capacity of the regional laboratories or strategic [alliances](#) to pull in research resources from non-profits and higher-education institutions. Such efforts would build implementation capacity for districts and schools around evidence and support site-level monitoring and evaluation activities in efforts to implement evidence-based practices.

It would also make sense for ISBE or an ISBE endorsed group to identify, broadcast and network schools and districts tackling similar work. The networks could include similar school or districts not in status. The more the people doing the work can share the details of implementation and success the more likely that evidence based practices may be applied more broadly. For example, it would be helpful to identify and spotlight those schools that have improved performance for targeted sub-groups and have those schools share their approaches and expertise with schools who have similar issues.

D. Periodic Resource Allocation Review

ISBE requests stakeholder comments on the proposed periodic resource allocation Review.

The resource allocation review should be conducted at both the district and school level if possible. Resource allocation differences and/or inequities often do not become visible at the district level, but do once the school level is examined.

Illinois Speech-Language-Hearing Association

35 E. Wacker Drive, Suite 850, Chicago, IL 60601-2106
Phone: 312/644-0828 Fax: 312/644-8557 Web: www.ishail.org
Voice and TT/TDD

October 10, 2016

Dear ESSA Committee,

The Illinois Speech-Language-Hearing Association represents over 2,100 of Illinois' 7,000 speech-language pathologists (SLPs) and audiologists, many of whom work in school settings. SLPs and audiologists are recognized in the new Every Student Succeeds Act under the term Specialized Instructional Support Personnel.

Audiologists and SLPs are often called upon to assist learners who are struggling and are often asked to provide important, valuable services to help students access the general curriculum. They can also be instrumental in designing learning systems for students. Although some of these students are eventually identified for services under IDEA, others are not. Struggling learners who are not identified for special education and specialized instructional supports may continue to need support in a typical education classroom. Learners who are identified for special education may benefit from specialized support from SLPs and audiologists through an Individualized Education Plan.

Audiologists are uniquely qualified to understand the impact of hearing loss on classroom learning, and they have the knowledge and skills to recommend specific strategies and technology to meet the individual communication, academic, and psychosocial needs of students with hearing disorders. Audiologists perform comprehensive, educationally relevant hearing evaluations and make recommendations to enhance communication access and learning. They evaluate and make recommendations for the use of hearing aids, cochlear implants, and personal, classroom, and other hearing assistive technology. They provide their expertise in collaboration with teachers and other school personnel to monitor and improve student outcomes in the educational environment.

SLPs provide preschool and school-based services to children. SLPs who work in the schools are uniquely qualified to contribute in a variety of ways to provide assessment and intervention in both general and special education settings across the learning continuum. They offer expertise in the language basis of literacy and learning as well as social communication, and they have experience with collaborative approaches to instruction and intervention. SLPs use student outcomes data when making decisions related to instruction and eligibility.

Speech-language pathologists and audiologists are integral parts of students' educational support systems. Our background and training in communication, language and literacy allow us to support both regular and special education students as well as educators. Considering this, we feel that we can provide guidance should ISBE's ESSA committee need specific advice regarding how Specialized Instructional Support Personnel are utilized in schools. ISHA will review the second draft of the ESSA state plan and will offer specific comments to the plan as deemed necessary by the ISHA Board. In the meantime, should you require information on SLPs' and audiologists' roles in supporting students under the new ESSA, we would be happy to assist you. Please consider contacting us as you continue to develop the state ESSA plan.

Sincerely,

Kim Pepler
President
Illinois Speech-Language-Hearing Association



Professionals Serving People with Communication Disorders