

ILLINOIS STATE BOARD OF EDUCATION

PROPOSAL FOR THE

NCLB DIFFERENTIATED ACCOUNTABILITY PILOT

Revised as of June 30, 2008



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I. EXECUTIVE SUMMARY

The Illinois State Board of Education (ISBE) welcomes the opportunity to submit this proposal to the U.S. Department of Education (ED) for participation in the NCLB Differentiated Accountability Pilot. ED has confirmed to the State Superintendent that Illinois meets ED's eligibility criteria for the pilot. At the beginning of the 2008-09 school year, ISBE will begin utilizing the proposed differentiated classifications.. ISBE will also provide the new flexibilities relating to SES and public school choice during the 2008-09 school year. In addition, ISBE will commence with intensive planning and needs analysis as well as beginning discussions with potentially eligible schools with the expectation that a limited number of schools will begin piloting the Priority Schools initiative during the 2008-09 school year. The remainder of the proposal will be implemented in the 2009-10 school year. Illinois' proposed changes will infuse corrective action strategies earlier in the improvement process, and includes an innovative, yet simple, model of differentiation. ISBE's proposed intervention model in the State's lowest-performing schools builds on promising national best practices and seeks to establish a new state approach for dramatically improving student achievement in these schools.

In developing this proposal, ISBE* began by establishing certain guiding principles for its approach to the differentiated accountability pilot:

1. Illinois should seek to develop an accountability system that targets supports and interventions to best improve student achievement and close achievement gaps. The State should therefore take advantage of this opportunity from the U.S. Department of Education to improve upon its current system and leverage federal flexibility and resources. To do so, Illinois must adhere to the bright line requirements set out by the U.S. Department of Education for the differentiated accountability pilot. These requirements include maintaining the current measurements of adequate yearly progress under NCLB, continuing to hold school districts and schools accountable for ensuring all students are proficient by 2013-14, and not differentiating among schools based on the criteria of whether the schools missed targets in the students with disabilities or limited English proficient student group.
2. As part of this pilot, Illinois should not seek to entirely remake its current accountability system. Doing so would create confusion for school districts and the public and strain the ability of the State to provide assistance and support for underperforming schools. Instead, Illinois should seek meaningful changes to its current accountability system upon which the State can build over time.
3. All of the school and district improvement designations in the NCLB timeline should more clearly inform relevant stakeholders whether the strategies for support and intervention should be targeted to specific deficiencies or address more systemic needs, and relate more directly to the supports offered by the State for addressing those needs.

* The Illinois State Board of Education refers to both the nine-member State Board and the state educational agency. As used in this proposal, "ISBE" refers to the state educational agency. "State Board" refers to the governing board of the agency.

4. The restructuring designation under federal law should distinguish between the lowest performing schools needing dramatic transformation in a short period of time and those that require less transformative, yet still fundamental, interventions.

These guiding principles informed the following strategies, which are more fully described in Section II:

- Strategy 1: Throughout the federal accountability system for schools and districts, differentiate those schools and districts requiring focused interventions from those requiring comprehensive action.
- Strategy 2: Eliminate “corrective action” as a distinct school designation in the accountability timeline, and instead infuse intensive corrective action strategies earlier in the improvement process.
- Strategy 3: Focus more intensive efforts and resources on the lowest-performing schools in comprehensive restructuring.

Section III of this proposal describes how the proposed differentiated accountability model addresses all of the 10 core principles established by ED for this pilot.

ISBE believes the strategies outlined in this proposal will help the State of Illinois improve upon its current accountability system, and thereby help the State, districts, and schools improve student achievement and close the achievement gap. ISBE looks forward to addressing any questions ED may have regarding the strategies described in this proposal.

II. THE PROPOSED DIFFERENTIATED ACCOUNTABILITY MODEL

Illinois' proposed differentiated accountability model relies on three strategies to better identify the types of supports and interventions needed for designated schools and districts, provide districts with the opportunity to better align interventions with overall improvement strategies, and focus attention and effort on the lowest-performing schools. Figures II.A. and II.B. present these strategies for each step in the improvement timeline for schools and districts, and compares them to the current state accountability system.

Strategy 1: Throughout the federal accountability system for schools and districts, differentiate those schools and districts requiring focused interventions from those requiring comprehensive action.

- This differentiation will rest on whether the school or district, based upon the most recent AYP calculation, missed AYP targets in the "ALL students" subgroup. Those not missing in the ALL students subgroup will be designated as "focused" (i.e., focused improvement, focused restructuring, etc.). Schools or districts missing in the ALL students subgroup will be designated as "comprehensive" (i.e., comprehensive improvement, comprehensive restructuring).
- The State's required improvement template for schools and districts in the focused categories requires data-driven, targeted strategies to address the specific areas of deficiencies ("Focused Planning"). The State's required improvement template for schools and districts in the comprehensive categories also requires the development of data-informed strategies for all areas of deficiencies. In addition, however, the school or district in the comprehensive category must ensure its improvement plan addresses the more systemic issues of: (a) data-driven decision making; (b) school-wide standards-aligned curriculum and instruction; (c) instructional leadership at the school level, and board and administrative leadership at the district level; and (d) student, family, and community supports ("Comprehensive Planning").
- The State will revise its public reporting processes to correspond to the new designations for the 2009 reporting cycle. The revised designations will help districts more clearly communicate the areas of deficiencies and focus of improvement and intervention strategies. The State will design a method for communicating the differentiated categories to be utilized in the 2008-09 school year.
- Illinois has established a regional system of support to provide services to schools and districts in need of improvement (the regional service provider (RESPRO) system). In addition, various ISBE divisions and programs offer support and services that help schools and districts address general and focused needs. The State's system of support, consisting of both RESPRO services and ISBE programs, will align supports and interventions to the revised designations:
 - Focused State Support: Schools in the focused category will get the necessary school-wide support but interventions will emphasize programs and processes that target the specific academic deficiencies within the school. For example, RESPRO services will seek to implement curricular improvements and teacher supports that have a demonstrated record of effectiveness in meeting the needs of the subgroup(s) failing to make AYP. ISBE support systems for various

student populations, such as students with disabilities and English language learners, will be targeted to those schools and districts with an identified need in a particular area.

- Comprehensive State Support: Comprehensive state support will still involve a focus on the needs of specific student populations within a school or district. In addition, however, comprehensive schools and districts will be prioritized for RESPRO and State supports in the following areas: (a) implementation of a comprehensive data-gathering system and methods of data analysis; (b) school-wide implementation of standards-aligned curriculum and instruction; (c) principal mentoring and support; and (d) improvements to student, family, and community support systems.
- Districts and schools will be provided with new flexibility to increase the number of students participating in supplemental educational services (SES), so that SES can better support both focused and comprehensive improvement strategies. Districts will be given discretion to "flip" SES and choice, so that SES is instituted in Improvement Year 1 and choice in Improvement Year 2. Many districts and schools will view an earlier implementation of SES as consistent with their overall "focused" or "comprehensive" improvement objectives. ISBE will strengthen its efforts to monitor and provide assistance to districts to increase participation in public school choice and SES. (See Part III, Core Principle 9)

Strategy 2: Eliminate "corrective action" as a distinct school designation in the accountability timeline, and instead infuse intensive corrective action strategies earlier in the improvement process.

- Currently, schools are designated for "corrective action" after missing AYP for four consecutive years. When designated for corrective action, a district must implement one or more specific school interventions identified in NCLB. If the school misses AYP for an additional year, it moves into restructuring planning, and its restructuring plan may or may not build on the corrective action intervention.
- Instead of designating corrective action as a separate one-year stage in the accountability timeline, districts will be expected to implement corrective action-type interventions earlier in the improvement timeline and maintain them until a change in status occurs. Beginning in School Improvement Year 2, a district will include within a school's improvement plan the intervention(s) it will institute to support its broader improvement objectives. The intervention will then have several years to demonstrate an impact. If the school should move into restructuring planning the district will have data to determine whether to continue them or move to more intensive interventions.
- The intervention may be "focused" or "comprehensive," depending on the designation of the school. Focused interventions will be as intense, but more targeted, than comprehensive interventions.

Examples of both are described below:

- Focused Interventions:
 - Restructure the internal organization of the school to focus instruction on the area of need (such as providing block scheduling and an aligned instructional program targeted to the subgroup(s) not meeting AYP);
 - Replace or reassign the school staff who are deemed relevant to the school not making AYP; or

- Appoint one or more outside experts to advise the school on (1) how to revise, strengthen, and implement its improvement plan to better address the area of focus; and (2) how to address the specific issues underlying the school's inability to make AYP.
 - Comprehensive Interventions:
 - Institute a new curriculum aligned to state standards with necessary professional development to support its implementation;
 - Develop and implement frequent formative assessments permitting immediate analysis, feedback, and instruction;
 - Create an extended day program for all students, or all underperforming students;
 - Implement a Response to Intervention model that emphasizes data-driven decision-making, team planning, and coordinated professional development coupled with personalized student instruction and interventions;
 - For high schools, establish (i) joint instructional and assessment programs involving feeder elementary school districts, and (ii) dual credit/enrollment programs with postsecondary institutions; or
 - Implement a comprehensive school reform program with the assistance and advice of one or more outside experts.
- ISBE may revise the required school improvement template to require a three-year improvement plan beginning in School Improvement Year 1, so that schools begin planning for a multi-year focused or comprehensive intervention at an early stage in the improvement timeline. Schools will still be required to revise this plan for each year that they do not make AYP.

Strategy 3: Focus effort and resources on the lowest-performing schools in comprehensive restructuring.

The following is a preliminary plan for restructuring and the Priority Schools initiative that has not yet been agreed to by all parties. The final proposal and implementation details will be developed collaboratively with stakeholders during the 2008-09 planning year.

- For schools in comprehensive restructuring planning or implementation, the lowest-performing Title I schools based on the overall percentage of students meeting/exceeding state standards in reading/English language arts and mathematics (labeled as "Priority Schools") will be eligible to participate in a comprehensive turnaround initiative seeking to improve academic outcomes as quickly as possible.
- Participation in the Priority School initiative will be voluntary and is available only to those schools receiving Title I funds. For the 2008-09 school year, ISBE will pilot the priority schools initiative with a limited number of schools.
- Participation will require the commitment of district leadership and the teachers union. Each participant in the initiative must commit to State-specified turnaround criteria and a process that involves the collaborative development of a plan for turnaround implementation involving district and school officials, the local teachers union, any external partner organization, and ISBE representatives. All of these parties must be engaged at the outset of the process, and throughout the plan's

development and implementation. (See Part III, Core Principle 10, for a description of the specific turnaround criteria that must be addressed by Priority Schools.)

- In return for their commitment to an intensive intervention model, Priority Schools will receive priority for various federal and state funding sources, with amounts designated to support the turnaround planning and implementation. In addition, Priority Schools will receive "protected space" for implementation consisting of: (i) maximum flexibility in the use of federal, state, and district funds; and (ii) flexibility from other federal, state, and local restraints to implement the turnaround initiative, consistent with the transferability provisions of Title VI of NCLB and the prohibition on supplanting. (See Part III, Core Principle 10, for a description of the specific "protected space" elements for priority schools.)
- Districts with schools participating in this initiative may select from a variety of approaches for turnaround implementation. (See Part III, Core Principle 10, for a description of the portfolio of approaches available for implementation.) Depending on the capacity of the district to lead the initiative, the turnaround may be implemented directly by the district or through a district partnership with an external provider. ISBE will oversee turnaround implementation in all participating schools, and will take a direct role in districts with minimal demonstrated capacity to implement a successful turnaround initiative.
- In the first year, Priority Schools will undertake a comprehensive turnaround planning process and implement certain state-specified requirements for capacity building and preparation (such as implementation of annual assessments to guide instruction (EXPLORE and PLAN for high schools), improvements to district- and school-level data capacity, implementation of Response to Intervention model with State support, etc.). The turnaround plan will be fully implemented in the second year and will remain in place for a four-year period.
- Schools eligible to participate in the Priority School initiative that choose not to participate must: (a) implement a restructuring plan that provides for an alternative governance arrangement that includes fundamental reforms, as approved by ISBE and required by NCLB; and (b) achieve specified improvement benchmarks within a two-year period. These benchmarks will be established by ISBE based upon an analysis of gains achieved by high-performing, high-poverty schools throughout the state within the same grade span. If these improvement benchmarks are not reached, the State will exercise its authorities under NCLB and state law to undertake a significant intervention within the school and/or district (See Part III, Core Principle 10, Section 10.1 for a discussion of interventions available under federal and state law.)
- A district may voluntarily enroll any school in focused or comprehensive restructuring planning or implementation in the Priority School initiative to access the "protected space" elements. Participating schools will receive priority for state and federal resources.

Figure II.A: Comparison of the Current and Proposed Accountability Model for Schools

YEARS MISSED AYP	CURRENT		PROPOSED			
	NCLB ACCOUNTABILITY DESIGNATION	NCLB REQUIREMENTS/ SUPPORTS	FOCUSED: <i>Not missing in "ALL students" subgroup</i>	FOCUSED REQUIREMENTS/ SUPPORTS	COMPREHENSIVE: <i>Missing in "ALL students" subgroup</i>	COMPREHENSIVE REQUIREMENTS/ SUPPORTS
1	-	-	-	-	-	-
2	School Improvement, Year 1	- Improvement Planning* - Choice	Focused Improvement, Year 1	- Focused Planning* - Choice or SES	Comprehensive Improvement, Year 1	- Comprehensive Planning* - Choice or SES
3	School Improvement, Year 2	- Choice and SES*	Focused Improvement, Year 2	- Focused Intensive Intervention - Choice and SES*	Comprehensive Improvement, Year 2	- Comprehensive Intensive Intervention - Choice and SES*
4	Corrective Action	- Implement Corrective Action - State System of Support Priority	Focused Improvement, Year 3	- Focused Intensive Intervention continues - Focused State Support Priority	Comprehensive Improvement, Year 3	- Comprehensive Intensive Intervention - Comprehensive State Support Priority
5	Restructuring Planning	- Restructuring Planning - State System of Support Priority	Focused Restructuring Planning	- Focused Intensive Intervention continues, with planning for fundamental organizational changes to address the area of focus - Focused State Support and Oversight <i>- May volunteer for Priority School Initiative</i>	Comprehensive Restructuring Planning	- Comprehensive Intensive Intervention continues, with planning for fundamental organizational changes to address comprehensive needs - Comprehensive State Support and Oversight <i>- Priority School designation for lowest performers; may volunteer for Priority School Initiative</i>
6	Restructuring Implementation	- Restructuring Implementation - State System of Support Priority	Focused Restructuring Implementation	- Implement fundamental organizational change to address area of focus - Focused State Support and Oversight <i>- May volunteer for Priority School Initiative</i>	Comprehensive Restructuring Implementation	- Implement fundamental organizational change to address comprehensive needs - Comprehensive State Support and Oversight <i>- Priority School designation for lowest performers; may volunteer for Priority School Initiative</i>
7 (and beyond)	Continued Restructuring Implementation	- Restructuring Implementation - State System of Support Priority	Continued Focused Restructuring Implementation	- Implement fundamental organizational change to address area of focus - Focused State Support and Oversight <i>- May volunteer for Priority School Initiative</i>	Continued Restructuring Implementation	- Implement fundamental organizational change to address comprehensive needs - Comprehensive State Support and Oversight <i>- Priority School designation for lowest performers; may volunteer for Priority School Initiative</i>

* Requirement continues in subsequent years.

Figure II.B: Comparison of the Current and Proposed Accountability Model for Districts

YEARS MISSED AYP	CURRENT		PROPOSED			
	NCLB ACCOUNTABILITY DESIGNATION	NCLB REQUIREMENTS/ SUPPORTS	FOCUSED: <i>Not missing in "ALL students" subgroup</i>		COMPREHENSIVE: <i>Missing in "ALL students" subgroup</i>	
			FOCUSED DESIGNATION	FOCUSED REQUIREMENTS/ SUPPORTS	COMPREHENSIVE DESIGNATION	COMPREHENSIVE REQUIREMENTS/ SUPPORTS
1	-	-	-	-	-	-
2	District Improvement, Year 1	Improvement Planning	Focused Improvement, Year 1	Focused Planning	Comprehensive Improvement, Year 1	Comprehensive Planning
3	District Improvement, Year 2	Improvement Planning	Focused Improvement, Year 2	Focused Planning	Comprehensive Improvement, Year 2	Comprehensive Planning
4 (and beyond)	Corrective Action	Implement Corrective Action	Focused Corrective Action	Focused Intensive Action	Comprehensive Corrective Action	Comprehensive Intensive Action

III. CORE PRINCIPLES ESTABLISHED BY THE U.S. DEPARTMENT OF EDUCATION

This Section of the proposal includes additional information to address all of the Core Principles for the Differentiated Accountability Pilot established by the U.S. Department of Education.

Core Principle 1: AYP Determinations Consistent with State's Consolidated Accountability Workbook

ISBE will continue to make annual AYP determinations for all public schools and districts as required by NCLB and as described in the State's approved accountability plan. The State's accountability system will continue to hold schools and districts accountable to ensure all students are proficient in reading/English language arts and mathematics by 2013 – 14.

Core Principle 2: Transparent Information About AYP Calculations

Illinois holds all public elementary, middle/junior high, and high schools, public charter schools, and LEAs to the same criteria when making AYP determinations. For the 2008-09 school year, in order for a school or district to be determined as making AYP, the following conditions must be met:

1. At least 95% tested in reading and mathematics for every student group. If the current year participation rate is less than 95%, this condition may be met if the average of the current and preceding year rates is at least 95%, or if the average of the current and two preceding years is at least 95%. Only actual participation rates are printed. If the participation rate printed is less than 95% and yet this school makes AYP, it means that the 95% condition was met by averaging.
2. At least 62.5% meeting/exceeding standards in reading and mathematics for every group. For any group with less than 62.5.0% meeting/exceeding standards, a 95% confidence interval was applied. Subgroups may meet this condition through Safe Harbor provisions. ***
3. For schools not making AYP solely because the IEP group fails to have 62.5% meeting/exceeding standards, 14% may be added to this variable in accordance with the federal 2% flexibility provision.
4. At least 90% attendance rate for non-high schools and at least 75% graduation rate for high schools.

*** Subgroups with fewer than 45 students are not reported. Safe Harbor only applies to subgroups of 45 or more. In order for Safe Harbor to apply, a subgroup must decrease by 10% the percentage of scores that did not meet state standards from the previous year plus meet the other indicators (attendance rate for non-high schools and graduation rate for high schools) for the subgroup. For subgroups that do not meet their Safe Harbor Targets, a 75% confidence interval is applied. Safe Harbor allows schools an alternate method to meet subgroup minimum targets on achievement.

The state's annual measurable objectives (AMO) are the same throughout the state for each public school, each district, and each subgroup of students and increase in equal intervals. Appendix (A) includes the chart of AMOs for Illinois.

Illinois requires a minimum of 45 students or more to constitute a subgroup for AYP calculation purposes. Illinois requires a minimum of 10 students for reporting of performance information to protect the privacy of individual students. Students who are enrolled in the district on or before May 1, and who stay continuously enrolled through state testing the following spring are considered to be enrolled for a full academic year. This ensures that the full academic year definition is less than 365 calendar days while taking into account the varying dates of state testing in Illinois.

Illinois provides LEAs with assessment results and AYP status in early summer. LEAs and schools then have the opportunity to review the data for accuracy. If school districts submit corrections, ISBE releases updated final assessment results and AYP status before the beginning of the school year. ISBE continually strives to provide assessment and AYP results as early as possible. Appendix (B) includes the reporting requirements codified in state law and the ISBE press release from 2007 announcing the release of Report Cards.

Illinois continues to modify and improve the reporting system for schools, districts, and the general public. In addition to the school, district, and state report card available at <http://webprod.isbe.net/ereportcard/publicsite/getSearchCriteria.aspx>, an interactive report card is available at <http://iirc.niu.edu/> that provides additional information such as interactive graphics; longitudinal trends from 1999-present; advanced search and school comparison capabilities; instructional materials; and individual student data (available only to school officials in accordance with federal and state law). The Illinois Interactive Report Card (IIRC) is located at Northern Illinois University and is funded by the Illinois State Board of Education.

Core Principal 3: Title I Schools Continue to Be Identified for Improvement as Required by NCLB

The State will continue to identify for improvement all schools and school districts receiving Title I funds after missing AYP for 2 years, as required by NCLB and described in the State's approved accountability plan. As described in Section II of this proposal, schools and districts will be identified in either the "focused" or "comprehensive" categories, depending on whether the school or district failed to make AYP in the "ALL students subgroup."

Illinois will continue to annually report school and school district status and achievement information. Illinois will be modifying both the report card template and the information contained on the IIRC as necessary to comply with changes to federal or state law, regulation or policy. See Appendix (B) for a sample school report card and IIRC web report. (See also Core Principal #7.)

Core Principal 4: Method of Differentiation

4.1 Has the state established technically and educationally sound criteria to distinguish between the phases (e.g., from "improvement" to "restructuring") of differentiation?

Illinois is only proposing two changes to the phases of improvement: (1) eliminating "corrective action" as a distinct phase in the school improvement timeline; and (2) creating a new "Priority School" designation for a subset of schools in comprehensive restructuring planning and implementation. The "corrective action" designation for schools will be replaced with the label of either "Focused School Improvement" or "Comprehensive School Improvement," Year 3. As described in Section II of this proposal, corrective action-type interventions will be introduced earlier in the school improvement timeline, allowing more time for interventions to improve students' academic proficiency in reading/English language arts and mathematics.

The criteria used to determine the "Priority School" designation will be straightforward – this designation will simply be based upon identifying the lowest performers in the designated grade span (elementary, middle, or high school), using the overall percentage of students meeting or exceeding state standards in reading/English language arts and mathematics. The grade span selected will be based upon State educational priorities and need. Initially, the Priority School initiative will be focused on high schools. The percentage of schools per grade span will not exceed the lowest 5% of schools, with separate percentages calculated for districts with a population over 500,000 and the remainder of the state. Using a simple metric and designation, such as the lowest performers based upon the percentage meeting or exceeding state standards, will be simple to communicate to the public and will allow the State to mobilize support for an intensive intervention. The actual percentage selected (e.g., lowest 3%, lowest 5%, etc.) will depend on State capacity to manage and provide additional federal and state resources for an intensive turnaround intervention (as further described under Core Principal Number 10, Section 10.3).

4.2 Has the state established technically and educationally sound criteria to differentiate between categories (e.g., between "targeted" and "comprehensive") within a phase of improvement?

Illinois' proposed basis for distinguishing between categories ("focused" and "comprehensive") will simply be based on whether the school or district failed to make AYP in the "ALL students" subgroup for the last annual calculation. Data demonstrates that the state assessment achievement levels of schools in the comprehensive category is approximately 30% lower than schools in the focused category. Using the "ALL students" subgroup as the basis for differentiation will be easy for districts and the public to understand, and is also based on educationally sound principles. Schools in the comprehensive categories of improvement are achieving lower than those in the focused category and thus would benefit more from intensive, systemic and specific interventions. Illinois does not believe that treating all schools the same for purposes of supports and interventions is an effective use of the limited resources available to the state, districts, or schools. Using the "focused" and "comprehensive" designations can allow the state and districts to better direct resources to the area of most need.

Tables 4.2.A and 4.2.B list the number of schools and districts that would fall into each category of improvement, based on 2006-07 data. Appendix C includes data that illustrates and supports the rationale for the category differentiation.

Table 4.2.A: Title I Schools not making AYP based on 2006-07 data.

* Does not include schools that made AYP for 2006-07 but are still in status.

YEARS MISSED AYP	CURRENT*				PROPOSED							
	NCLB ACCOUNTABILITY DESIGNATION	NUMBER OF SCHOOLS (BY GRADE SPAN)			FOCUSED: <i>Not missing in "ALL students" subgroup</i>			COMPREHENSIVE: <i>Missing in "ALL students" subgroup</i>				
		FOCUSED DESIGNATION	NUMBER OF SCHOOLS (BY GRADE SPAN)		COMPREHENSIVE DESIGNATION	NUMBER OF SCHOOLS (BY GRADE SPAN)						
		Elem	Middle	HS		Elem	Middle	HS		Elem	Middle	HS
1	-				-				-			
2	School Improvement, Year 1	39	12	17	Focused Improvement, Year 1	28	11	1	Comprehensive Improvement, Year 1	11	1	16
3	School Improvement, Year 2	20	3	16	Focused Improvement, Year 2	12	3	0	Comprehensive Improvement, Year 2	8	0	16
4	Corrective Action	19	3	12	Focused Improvement, Year 3	13	3	5	Comprehensive Improvement, Year 3	6	0	7
5	Restructuring Planning	36	7	14	Focused Restructuring Planning	25	6	6	Comprehensive Restructuring Planning	11	1	8
6	Restructuring Implementation	174	26	57	Focused Restructuring Implementation	46	12	0	Comprehensive Restructuring Implementation	128	14	57
7	Continued Restructuring Implementation				Continued Focused Restructuring Implementation				Continued Restructuring Implementation			
	TOTAL	288	51	116		124	35	12		164	16	104

Table 4.2.B: Districts in Each Proposed Category, Using 2006-07 Data

YEARS MISSED AYP	CURRENT				PROPOSED							
	NCLB ACCOUNTABILITY DESIGNATION	NUMBER OF DISTRICTS			FOCUSED: <i>Not missing in "ALL students" subgroup</i>			COMPREHENSIVE: <i>Missing in "ALL students" subgroup</i>				
		FOCUSED DESIGNATION	NUMBER OF DISTRICTS			FOCUSED DESIGNATION	NUMBER OF DISTRICTS			COMPREHENSIVE DESIGNATION	NUMBER OF DISTRICTS	
1	-	Elem	HS	Unit		Elem	HS	Unit	-	Elem	HS	Unit
2	District Improvement, Year 1	25	6	41	Focused Improvement, Year 1	24	2	38	Comprehensive Improvement, Year 1	1	4	3
3	District Improvement, Year 2	5	8	3	Focused Improvement, Year 2	4	4	2	Comprehensive Improvement, Year 2	1	4	1
4 (and beyond)	Corrective Action	5	24	9	Focused Corrective Action	2	11	6	Comprehensive Corrective Action	3	13	3
	TOTAL	35	38	53		30	17	46		5	21	7

4.3 Has the state provided a description and detailed examples of how schools could move between different categories and phases of improvement?

Schools move through the improvement process in a manner similar to the current process. Schools and districts will continue to move through the phases of improvement each year the school does not make AYP. In addition, schools and districts will also fall into either the “focused” or “comprehensive” categories. As such, with each annual AYP calculation, schools could move from one category to the other. For example, a school may be identified in Comprehensive School Improvement Year 1 because the students in the school (based upon the ALL students subgroup) did not meet the mathematics proficiency target. The next year, after planning and intervention, the school makes progress and only one subgroup does not meet the AYP proficiency target (i.e. the school made AYP in the ALL subgroup). The school would then be identified as in Focused School Improvement Year 2. The school would then receive support and target improvement strategies to the subgroup that did not make AYP.

4.4 Has the state proposed a technically and educationally sound process for using valid and reliable additional academic indicators?

The Illinois proposal does not involve additional academic indicators.

Core Principle 5: Transitioning to a Differentiated Accountability Model

5.1 How does the differentiated accountability model consider the current status of a school?

All schools currently identified for status will continue to be identified. However, a descriptor (i.e., focused or comprehensive) will be added to better identify the types of supports and interventions needed for designated schools and districts.

5.2 How will the state ensure students participating in public school choice (PSC) and supplemental educational services (SES) during the 2007-08 school year continue to have those options available to them during the transition, even if they would not be eligible under the state's proposed model?

ISBE does not anticipate issues with providing PSC or SES during the transitional year since schools that have already been identified in year 1 or year 2 of school improvement will continue to provide those services. Schools moving from year 1 to year 2 will be required to continue to offer PSC and also offer SES as required by NCLB. Only newly identified schools will be affected by the proposed changes to “flip” SES and choice.

Schools in School Improvement Year 1 seeking to implement SES instead of PSC will be required to notify ISBE of this election within a specified time period after receiving its AYP determination, and must comply with all ISBE timelines for SES implementation. Therefore, the transition to the proposed model will occur prior to the beginning of the 2009-10 school year and no students will be notified of a PSC option that is not available to them. (See also Core Principal #9).

Core Principle 6: Transparency of Differentiation and Interventions

6.1 How has the state ensured that the process for differentiation is data-driven and accessible to the public?

The differentiation process is based on existing AYP determinations. By not changing the fundamental way AYP is calculated and the primary status designations, districts and the public will only have to learn the new classifications and related implications. Various methods will be used to inform the public about the differentiated accountability system and Priority Schools initiative, including information on ISBE's website, outreach to ISBE constituent organizations, and regional information sessions.

Core Principle 7: Intervention Timeline

7.1 Has the state established a comprehensive system of interventions and clearly described how the interventions relate to the academic achievement of the schools?

Illinois' differentiated accountability proposal seeks to meaningfully modify its current accountability system in order to improve upon the existing system of support and interventions and their relation to academic achievement of students. The inclusion of two categories – focused and comprehensive – will inform the public and stakeholders of the strategies for support and intervention to be targeted to specific academic deficiencies and more systemic needs.

Differentiated accountability will allow the State's established regional system of support, RESPRO, to provide more effective services to schools and districts in need of improvement. The comprehensive system of interventions will include various ISBE divisions and programs to offer support and services that help schools and districts address general and focused needs. The State's system of support, consisting of both RESPRO services and ISBE programs, will align supports and interventions to the academic needs identified in the annual AYP calculations. The intervention may be "focused" or "comprehensive," depending on the designation of the school. In either the focused or comprehensive categories, support will be provided to the whole school. However, in the focused categories, focused support and interventions would be directed to students not making AYP. Focused support and interventions would be as intense, but more targeted, than comprehensive support and interventions. Examples of both are described below:

- **Focused State Support and Interventions:** Focused state support and interventions will emphasize programs and processes that target the specific academic deficiencies within the school. For example, RESPRO services will seek to implement curricular improvements and teacher supports that have a demonstrated record of effectiveness in meeting the needs of the subgroup(s) failing to make AYP, as well as the needs of other low-performing student populations who may not constitute a subgroup. ISBE support systems for various student populations, such as students with disabilities and English language learners, will be targeted to those schools and districts with an identified need in a particular area.
- **Comprehensive State Support and Interventions:** Comprehensive state support and interventions will still involve a focus on the needs of specific student populations within a school or district. In addition, however, comprehensive schools and districts will be prioritized for RESPRO and State supports in the following areas: (a) implementation of a comprehensive data-gathering system and methods of data analysis; (b) school-wide implementation of standards-aligned curriculum and instruction; (c) principal mentoring and support; and (d) improvements to student, family, and community support systems.

See Core Principle Number 10 for a description of the application of the Priority Schools Initiative to the lowest performing schools in the State.

7.2 Has the state explained how its proposed system of interventions aligns with and builds on current state interventions?

The proposed system of interventions aligns with existing efforts to expand the State's system of support. The RESPRO system of support will continue its work with schools and districts that have been identified for improvement. Established by ISBE in 2003, six service regions in Illinois are served by ten RESPRO organizations. Each RESPRO provides school support teams for all schools that do not make adequate yearly progress for at least two consecutive years. The school support teams are comprised of distinguished teachers and principals, representatives of higher education, and others qualified in the specific areas for which a school needs assistance to effect academic improvement.

The teams work with the schools and LEAs to help them develop and implement School Improvement Plans (SIPs), ensuring that the plans are data-driven, complete, approvable, timely, and effective. Through frequent monitoring and assistance with the plan the team is able to guide the development of improvement activities and discern the professional development needs of the school. School support team members spend a great deal of time reviewing data specific to the school and collaborate with the local school improvement team to develop recommendations for improving student academic performance. The RESPRO system of support emphasizes school improvement programs and processes that have a record of success, and encourage use of those that are most likely to improve the academic achievement of students when tailored to the LEAs and schools they serve.

The implementation of a differentiated accountability system provides the perfect opportunity to expand the supports available to schools and districts. Additional professional development and training may be provided to RESPROs to improve the services and expertise they provide to schools and districts. Outside experts will also contribute to the state system of support by providing technical assistance as needed. An evaluation of the RESPROs is under development to strengthen that part of the system.

Expansions to the Illinois system of support will include the development of improvement modules. Modules will be designed with a specific target of improved achievement that can be combined with other modules and improvement strategies for schools in the comprehensive category. These specific modules will become imbedded within the SIP, will be supported by RESPROs (at a minimum), and will be provided from the beginning improvement planning stages. The following are examples of modules that will likely be included with the Illinois system of support:

- One module will focus on building LEA capacity by training school staff to use data in more effective ways. Schools will become informed by student achievement data and other outcome-related measures to drive instruction that is tailored to meet the needs of individual schools. Schools will be provided training in the framework through an SEA provider who will ground all school decision making in this theory of planning for change, doing/implementing the change, check/monitoring to see

what impact the change has had, and then act/adjusting upon the change needed. This model will encourage the school to work on a continual model of self-improvement with student needs being at the center of the school.

- Other examples include Systemic Improvement or Decision Making Frameworks that would include Professional Learning Communities; Plan, Do, Check Act (PDCA) Model; Curriculum Mapping; Understanding Children of Poverty; and Teaching Difficult Students. Modules that are targeted toward academic needs could include Specific Grade Level Core Content Areas focusing on classroom strategies to meet the needs of all learners (Math, Reading, Writing, Science, etc.); Classroom Management Skills; Progress Monitoring of Students and Programs; Individual Student Performance Training; and Aligning Coursework to Standards/Benchmarks. As described above, specific interventions will be provided based on the unique needs of each school through the support of RESPROs and articulated within the School Improvement Plans.

7.3 How does the state's model ensure that Title I schools and school districts identified for improvement that continue to miss AYP progress through an intervention timeline with interventions increasing in intensity over time?

As illustrated in Figures II.A and B, schools and districts will progress through a very similar intervention timeline as existing law. The removal of the abrupt corrective action designation while requiring intensive interventions earlier in the improvement timeline will encourage more strategic and long-term planning and implementation of supports. Again, similar to existing law, schools and districts that miss AYP for a fourth consecutive year enter the restructuring phase where supports will be triaged. As in all states, ISBE's capacity requires the prioritization of supports and resources. The Priority Schools Initiative described in Part II, Strategy 3 and in Core Principal #10 will target the lowest-performing schools based on the overall percentage of students meeting/exceeding state standards.

Schools in the restructuring phase that are not among the lowest-performing schools must still engage in restructuring planning and implementation involving an alternative governance arrangement seeking fundamental reform, as required by NCLB. With the revised designations, ISBE and the RESPROs will be able to better determine whether the proposed restructuring strategies are tied to student achievement data and propose interventions that address a school's targeted or systemic need.

ISBE recognizes that due to its available capacity for implementation of the Priority Schools initiative, many of the lowest-performing schools in restructuring planning or implementation will not be eligible to receive available state and federal funding support to participate. ISBE will still strongly encourage these schools to volunteer for the initiative to receive the "protected space" elements and priority for funding after those schools designated for Priority focus.

ISBE and its RESPRO partners will also closely monitor and support restructuring planning and implementation in the lowest performing schools that do not participate in the Priority Schools Initiative.

7.4 How will the state and its school districts ensure that students in schools needing the most comprehensive interventions have access to teachers and principals with a demonstrated history of improving student achievement? How will the state and its school districts target resources to improve teacher and principal effectiveness?

Research and experience indicate that of the factors contributing to student learning, classroom instruction and school leadership are the first and second most important factors, respectively. Furthermore, schools struggling academically need effective teachers and leaders (principals and superintendent) more than other schools similarly situated. Illinois is building its internal and external capacity to improve leadership within underperforming schools.

As part of both the focused and comprehensive planning process, a needs assessment must be performed. A more detailed evaluation of the school's personnel, including leadership and capacity to improve student achievement, will be embedded within the planning stage. If principal and teacher effectiveness has been identified as a substantial factor for the schools inability to make AYP, then specific interventions will be initiated. Focused schools will receive professional development for the teachers working with the subgroups not making AYP and empowerment/leadership training to promote support school wide. For comprehensive schools, Illinois will be developing a module that focuses on improving teacher and principal skills and recruiting effective teachers and principals. This specific review of the schools' existing personnel is combined with the outside expertise provided through the RESPRO system and external partners to provide access to individuals with a demonstrated history of improving student achievement. ISBE will direct comprehensive schools and districts as part of their improvement planning to identify professional development and resources that can be targeted to teachers and principals teachers.

Core Principle 8: Types of Interventions

8.1 Has the state proposed interventions that are educationally sound and designed to promote meaningful reform in schools?

Last year, 36 districts and 184 schools were removed from improvement status by making AYP for two consecutive years. Illinois credits its successful academic improvement efforts for schools in need of support to a number of factors. First, ISBE requires school improvement plans to be data-driven, with strategies developed based upon identified deficiencies. Second, the RESPRO system has been able to deliver support and expertise to schools throughout the state. Finally, conscientious monitoring of the plans is accomplished through a shared partnership with ISBE, the RESPRO, and the school. Illinois will continue to provide support to LEAs and schools to improve student achievement. As the percentage of a school's students required to meet or exceed state standards increases to 62.5 percent in 2008 and 70 percent in 2009, targeted interventions will be critical to providing consistent and collaborative support throughout Illinois' schools. Illinois will continue to implement existing effective reform efforts and expand its support system to provide both targeted and comprehensive assistance to the schools and districts that need it most. Please see Core Principal #7.2 for more details on the interventions strategies and how they relate to existing state supports.

8.2 How will the state align its resources to increase state and local capacity to ensure substantive and comprehensive support for consistently underperforming schools including plans to leverage school improvement funds received under section 1003(g) of the ESEA, and Title II funds to provide targeted intervention, particularly to those schools subject to the most intensive interventions?

Illinois currently uses over \$23 million of its Title I state allocation for activities associated with section 1003(a) to conduct state-level activities through the Regional System of Support Providers (RESPRO). To ensure the lowest performing schools receive substantial and comprehensive support, the schools that participate in the “priority” schools initiative will receive preference for school improvement funds under NCLB, such as school improvement funding under 1003(g). In addition, a portion of state funding will be designated to support the turnaround planning and implementation. In addition, priority schools will: (i) be granted maximum flexibility in the use of federal, state, and district funds; and (ii) be able to receive flexibility from other federal, state, and local restraints to implement the turnaround initiative.

Additionally, under the State transferability provisions allowed in section 6123 of NCLB, Illinois may seek to transfer funds allotted to the State for certain NCLB provisions to its allotment under Title I to support agency and school district efforts to implement the Priority Schools initiative. ISBE will also continue efforts to realign internal and external support systems.

Core Principle 9: Public School Choice and Supplemental Educational Services

9.1 Has the state established clear eligibility criteria for PSC and SES?

As described in Section II, Illinois is proposing the following modifications to its administration of PSC and SES:

1. Districts that have limited space available for the number of students eligible for public school choice would be able to request a waiver from ISBE to prioritize notifications to parents of students eligible for public school choice
2. Districts will be given discretion to "flip" SES and choice, so that SES is instituted in Improvement Year 1 and choice in Improvement Year 2.

Details of the above modifications are enumerated below.

9.2 Has the state established an educationally sound plan to increase the number of students participating, in the aggregate, in PSC and SES at the state level (even if the number of students eligible for these options decreases)?

Illinois has over 875 school districts, many with only a single attendance center, and PSC has only been utilized by a small percentage of students. Illinois intends to increase the number of students participating in PSC by ensuring that districts notify eligible parents before the start of school of the availability of public school choice, and will continue to monitor district implementation of PSC.

Illinois has made several efforts to increase SES participation. ISBE offers technical assistance to districts through various mechanisms, including regional workshops and on-line toolkits and forms, and that technical assistance encourages districts to consider ways to increase student participation in SES, including voluntary implementation of SES in Year 1 of School Improvement in conjunction with school choice.

The State's SES administrative rules establish implementation timelines that are intended to ensure parent notification and a start of services to maximize student participation. ISBE continues to add approved providers to its state list, thereby increasing options for parents across the state. ISBE has encouraged districts to offer summer SES programs. ISBE has made available to SES high schools the option to offer SES during study halls per the technical assistance provided by the U.S. Department of Education. The Illinois administrative rules (23 IL Admin Code 675.90) describe the process for evaluating provider effectiveness for Illinois students after services are completed. An outside contractor is currently conducting an evaluation of SES provider effectiveness in Illinois.

1. Districts that have limited space available for the number of students eligible for public school choice would be able to request a waiver from ISBE to prioritize notifications to parents of students eligible for public school choice. Districts seeking a waiver of the choice notification requirements will need to submit: a) rationale and basis of prioritization, b) enrollment and space limitation information, c) plans to increase choice options and/or why such options are not feasible, and d) assurances that no eligible student would be denied placement if available, districts requesting a waiver of the choice notification requirements will need to submit enrollment and space limitation information for all Title I schools within the district boundaries. Waivers will be considered on a case-by-case basis dependent on the information provided by the district. Until the districts receives written notification that a waiver has been granted, the district must continue to send notification letters to ALL students in schools in need of improvement and list available choice schools as required by law. ISBE also provides regional workshops to assist schools in improvement with the implementation of PSC.
2. Districts will be offered the flexibility to provide Supplemental Educational Services during the first year of School Improvement for eligible students. ISBE believes reversing the order of sanctions will provide a more effective intervention strategy for the first year of improvement by offering eligible students SES while planning for choice implementation in year two. Illinois meets the four “Conditions for Participation”.
 - a. Availability of SES providers.

ISBE has on its [website](#) three files of information about approved SES providers, including identification of providers by profit, non-profit, and other categories; this list also indicates which providers work through on-site, off-site, and on-line locations. There are approximately 40 providers approved to serve every district in the state. Each LEA or parent can contact those providers to determine if they will serve their particular area or student. Many districts have more than just the 40-statewide providers as possible providers.
 - b. Effective parent notification and outreach.

ISBE requires districts to provide notice to parents about the identification of their child's school as in need of improvement and their parental involvement opportunities, including the availability of the SES and public school choice options within a few weeks of the start of school, if not before. To ensure the notifications contain all required information, ISBE approves LEA's notification letters before they are distributed to parents. ISBE checks these notifications for the NCLB-required elements and for readability. ISBE will work with districts to ensure multiple or rolling SES enrollment periods are offered during the course of a school year until all SES funds have been used or until all possible student demand has been met.

c. Level Playing Field for all providers.

ISBE's administrative rules for SES require that "district personnel shall treat all providers of SES impartially" (23 Illinois Administrative Code 675.30(q)), which would include making facilities available to all when available to one. This is applicable especially if one of the SES providers is the LEA. Thus, ISBE ensures fair and equitable treatment of non-LEA providers. ISBE has made clear to districts and providers that providers have the right to market their services directly to parents. Districts may exercise some control over distribution of materials on district property and through district mechanisms; ISBE governs marketing content somewhat through the provisions in our Ethics Code (23 Illinois Administrative Code 675.30), such as prohibitions against misrepresenting the location of services or a provider's approval status.

d. Reporting.

ISBE is prepared to supply to USDE such data on this pilot project as may be required.

1. Districts will have flexibility to extend SES to all low-achieving students (regardless of low-income status), provided all non-proficient low-income students receive first priority for service.

Core Principle 10: Significant and Comprehensive Interventions for Consistently Lowest-Performing Schools

The following is a preliminary plan for restructuring and the Priority Schools initiative that has not yet been agreed to by all parties. The final proposal and implementation details will be developed collaboratively with stakeholders during the 2008-09 planning year.

10.1 How does the state ensure that interventions for the lowest-performing schools are the most comprehensive?

Under the proposed model, the lowest-performing Title I schools in the comprehensive restructuring planning and restructuring implementation years will be eligible for an intensive "Priority Schools" initiative seeking dramatic changes that produce significant

achievement gains as quickly as possible. In creating the Priority Schools framework, Illinois has drawn from national studies of the strategies used by pioneering large urban school districts, including Chicago Public Schools, to implement turnaround strategies, while considering how these comprehensive strategies can be administered at a statewide level.

Eligibility for the Priority School initiative will be based upon a ranking of schools within one or more grade spans selected by ISBE (i.e., elementary, middle, or high school) by the overall percentage of students meeting or exceeding state standards in all subjects. ISBE will establish a percentage cap of no more than the "bottom 5%" of schools in a grade span that are eligible to participate in the initiative, based upon the capacity considerations described in Section 10.3. A separate "bottom percentage" will be calculated for districts with a population over 500,000, and all other school districts. This is a common distinction made in the Illinois School Code for various state programs and requirements, and is necessary to ensure resources for the Priority Schools initiative are equitably distributed among multiple school districts.

Although ISBE will need to further evaluate its capacity, ISBE intends to pilot the Priority School initiative with a limited number of schools in the 2008-09 school year and anticipates that the Priority School initiative will commence in earnest in 2009-10. The first year of full implementation will be limited to the bottom 3% of high schools. This would equate to approximately four high schools in Chicago Public Schools, and 17 in the rest of the state. A higher percentage of high schools and/or other grade spans may be added in future years. The process for schools to participate in the Priority Schools initiative is described in Section 10.2.

For school districts with multiple schools potentially eligible for the Priority School initiative, the district may request permission from ISBE to transfer eligibility from a school designated for priority by the State Board to another similarly situated school. In order to transfer eligibility, the district must demonstrate the transfer is necessary to achieve district educational objectives for the originally designated school and the students it serves, and the district interventions proposed for the originally designated school must comply with the restructuring requirements under NCLB. In subsequent years, ISBE may again designate a school whose eligibility has been transferred for Priority School focus if the district interventions are not demonstrating sufficient student achievement gains.

All participants in the Priority Schools initiative would be required to commit to implementing dramatic changes in operating and instructional conditions to enable the success of the turnaround effort. These "people, program, time, and money" conditions are described below.

Required Criteria for Operating and Instructional Conditions for Turnaround in Priority Schools

People:

1. **School-level turnaround leader:** The turnaround plan designates a school-level leader to exercise autonomies under the plan and ensure adherence to the turnaround model. Depending on the overall turnaround approach, the leader may be a principal designated by the district or a leader working under the direction of an external partner organization.

2. **Highly capable, distributed school leadership team:** The turnaround plan must demonstrate how the school will be put on a path to distributed leadership, with a highly capable leadership team working to build a cohesive, professional teaching culture. The plan for a distributed leadership team must include the school-level turnaround leader and teachers with augmented school roles.
3. **Flexibility and control over staffing:** While distributed leadership is an essential long-term goal, in the short term, the school-level turnaround leader may need to make a host of rapid and important decisions about personnel. The school-level turnaround leader must have authority to select and assign staff to positions in the school based on qualifications, without regard to seniority, and must act decisively after receiving appropriate input from the school's leadership staff and other relevant constituencies.
4. **Performance-based expectations for adults:** Performance-based expectations must be established for all adults in the building through both evaluation processes and incentive programs. Performance-based expectations may be either individual or collective.

Program:

5. **Personalized student supports:** The turnaround plan must identify personalized academic and non-academic support services for targeted instructional interventions and to address student social and emotional needs.
6. **Aligned and data-driven instructional systems:** The turnaround plan specifically implements the following instructional systems and strategies:
 - Alignment of curricula, assessments, and professional development to state standards and expectations;
 - Development and use of frequent formative assessments permitting immediate analysis, feedback, and targeted instruction; and
 - Data-driven decision-making for all activities relating to curriculum development, instructional strategies, and student-level interventions.
7. **Integration of existing instruction and professional development activities:** The turnaround plan must identify all state, district, and school instructional and professional development programs currently impacting the school, and demonstrate how these programs will be integrated with or eliminated by the turnaround effort.

Time:

8. **Extended learning:** The school schedule for student learning must provide additional time on a daily, weekly, and/or annual basis for the delivery of instruction and provision of individualized support as needed in core academic subjects.
9. **Faculty collaboration:** The weekly and annual work schedule for teachers must provide adequate time for regular, frequent, faculty meetings to discuss individual student progress and school-wide efforts.

Money:

10. **Control over financial resources:** The school-level turnaround leader must have control over financial resources necessary to successfully implement the turnaround implementation plan.

While all schools would be expected to commit to the same criteria for operating and instructional conditions, districts would have flexibility in how the turnaround approach is structured. The portfolio of options for turnaround implementation is listed below:

Same School Approaches

1. **District Cohort Model:** The turnaround effort involves the same school and same students, and is managed directly by a special unit within the district with authority and accountability for results. This model would only be appropriate with districts that have sufficient capacity and resources to manage the turnaround effort without extensive oversight by the state or direct management by an external partner organization.
2. **Partner Consulting Model:** The turnaround effort involves the same school and same students, with an external partner organization managing the turnaround effort with authority and accountability for results. This model involves less direct district management and oversight than the District Cohort model, but more than the Partner Management Model. This model also anticipates that, eventually, as achievement levels rise, the role of the external partner organization will transform from that of turnaround manager to external support provider.
3. **Partner Management Model:** The turnaround effort involves the same school and same students, with a school management organization (SMO) managing the turnaround effort with authority and accountability for results. Of the same school models, this model would be most appropriate for districts with little demonstrated capacity to assist with the management of a turnaround effort, and for higher capacity districts seeking to vest more direct control in external partner organizations. This model assumes a long-term role for the SMO in managing the turnaround school, and may or may not include a plan for transition of responsibility back to the district.

New School Approaches

1. **Close and Replace/Non-charter Model:** A low-performing school is closed, and replaced by one or more new schools in the same geographic area serving the same or similar students. Districts with sufficient capacity and resources may be authorized to manage the turnaround implementation; all others would be expected to work with an external partner organization. Critically, the new school or schools must be operated to address all of the state's criteria for turnaround, and be expected to meet specified metrics for student achievement.
2. **Close and Replace/Charter Model:** A low-performing school is closed, and replaced with one or more charter schools operated by an SMO partner in accordance with all of the requirements of the Illinois Charter Schools Law (and subject to the availability of charters under the Charter Schools Law). Again, the new schools must address the state's criteria for turnaround, and be expected to improve performance in accordance with specified metrics for student achievement.

As part of the Priority Schools Initiative, ISBE will need to actively recruit external partner organizations from throughout the state. In particular, ISBE will seek to engage organizations that have a demonstrated record of effective work with underperforming schools, and that have a strong connection with the local community in which the schools are located (or that create partnerships with locally-based organizations).

Schools committing to the Priority Schools Initiative will be prioritized for various federal and state funding sources. In particular, if ISBE is allocated funding under the federal School Improvement Grant program (Section 1003(g) of NCLB), ISBE will seek to use a portion of these funds to support activities within the Priority Schools. Each district participating in the Priority Schools initiative will receive a grant from ISBE for planning and implementation activities. The district will be expected to make a substantial funding commitment to support the intervention as well. All funds must be used for purposes specified by ISBE, and in accordance with an implementation agreement between ISBE and the district. In many instances, the district will need to allocate funding to an external partner that will support planning and implementation activities.

In addition to funding support, Priority Schools will receive "protected space" for turnaround implementation through flexibility from federal, state, and district restraints:

- *Federal:* ISBE proposes that all schools participating in the Priority Schools initiative be granted the same flexibility available to schools participating in a Title I schoolwide program to (a) integrate Title I funding with other funds to upgrade the educational program of the school in accordance with the turnaround plan, and (b) receive exemption from federal regulatory requirements to the extent necessary and allowable to implement the turnaround plan. No separate application or plan will be required to obtain the schoolwide program flexibility – enrollment in the Priority Schools initiative will be deemed sufficient. The turnaround plans for Priority Schools will address both the state's required criteria for turnaround and the requirements for schoolwide programs in Section 1114 of NCLB. Generally, Priority Schools will be required to comply with the requirements of Section 1114 of NCLB to obtain Title I schoolwide program flexibilities, except: (i) the 40% poverty threshold may be waived for schools participating in the Priority Schools initiative, if necessary; (ii) the turnaround plan for the Priority School must be approved through the process established by ISBE for the Priority Schools initiative; and (iii) the planning period will occur in the school year prior to implementation, but may be less than one-year (i.e., twelve months) in duration. In addition, ISBE proposes that districts participating in the Priority Schools initiative have authority under the State and Local Transferability Act (Section 6123 of NCLB) to transfer no more than 50% of the funds allocated to the LEA for certain federal programs (Title II, Technology Grants, Safe and Drug Free Schools, and Informed Parental Choice and Innovative Programs) to its allocation for school or district improvement activities that support the turnaround implementation, as approved by ISBE. This flexibility would be provided regardless of the district's status under NCLB. ISBE, the districts, and schools must not use federal dollars to supplant state/local funds. Attorneys for ISBE and the Department will work collaboratively to ensure flexibilities, transferability, and waivers are implemented and administered consistent with federal law.
- *State:* Under Section 2-3.25g of the Illinois School Code, school districts may petition the State Board of Education for the waiver or modification of any School Code mandates or administrative rules. 105 ILCS 5/2-3.25g. Waivers of administrative rules can be approved by the State Board. Waiver of statutory mandates must be acted upon by the General Assembly. ISBE will work with districts participating in the Priority Schools initiative to use the waiver and modification

authority under the School Code to remove any state statutory or regulatory barriers to turnaround implementation. If particular statutory issues are identified as common barriers, ISBE will seek a statutory amendment through the legislative process.

- *District:* All districts participating in the Priority Schools initiative must provide maximum freedom from district-wide mandates and restrictions, particularly those relating to curriculum, professional development, the daily schedule, annual calendar, budgeting processes, and improvement planning requirements. In addition, participating districts and their teacher unions, with guidance and assistance from a state support team, will be required to engage in a focused effort to address any limitations on turnaround implementation in the collective bargaining agreement to the maximum extent possible. Specifically, the school district and its teacher union will be required to address how the collective bargaining framework will or will not apply to the people, program, time, and money criteria of turnaround implementation (discussed earlier in this subsection). Incentives for the teacher unions to engage in this process will include additional pay for the professional development and learning time necessary for the turnaround model, and opportunities for performance-based pay enhancements.

State and federal funding administered by ISBE for the Priority Schools initiative will be directed to participating schools meeting the eligibility criteria established by ISBE for that year (e.g., the "bottom 3% of high schools"), unless funding priority is transferred to another school within the district as described in Section 10.1. However, any district with a school in restructuring planning or implementation (whether focused or comprehensive) may opt into the Priority Schools initiative to obtain the federal and state "protected space" flexibility described above, provided the district implements a turnaround plan meeting the state's criteria. These schools will be prioritized for state and federal funding assistance for the Priority Schools initiative, if funding is available after serving those schools designated for Priority focus by the State Board.

Schools designated for Priority focus by State Board will not be required to participate in the Priority Schools Initiative. However, if a school designated for Priority focus does not participate, ISBE will take the following actions:

- First, the restructuring plan for the school will be subject to approval by ISBE to ensure it includes an alternative governance arrangement that makes fundamental reforms, as required under NCLB.
- Second, the school will be expected to demonstrate significant achievement gains under the plan for the current school and subsequent school year. The required achievement gains will be calculated by ISBE based upon an analysis of gains achieved by high-performing, high-poverty schools throughout the state within the same grade span. If these gains are not achieved, ISBE will exercise its authorities under NCLB and the Illinois School Code to take intensive and significant within the school and district. Section 2-3.25f of the School Code, 105 ILCS 5/2-3.25f, authorizes ISBE to undertake significant interventions in both districts and schools, including removing school board members, appointing an independent authority to operate a district or school, directing the reassignment of staff, or non-recognizing the school (which would likely lead to its closure).

In addition, ISBE will rely on its district corrective action rights under NCLB (if the district is in federal improvement or corrective action status) to remove authority from the local district and ensure the implementation of an intensive turnaround plan.

10.2 Has the state established an educationally sound timeline for schools to enter and exit the most comprehensive interventions?

During the 2008-09 school year, ISBE will engage in an intensive planning and needs analysis process involving ISBE, identify external partner organizations to work with participating schools, enter into agreements as necessary, identify potentially eligible schools for the Priority Schools initiative and begin discussions to ensure participation by all key stakeholders necessary for successful implementation. Extensive professional development and recruitment of staff will occur at the end of the school year and through the summer. Based on the work described above, ISBE intends to pilot the Priority School initiative with a limited number of schools in the 2008-09 school year. Turnaround implementation will begin in earnest, and on a larger scale, during the 2009-10 school year.

During the 2009-10 school year, participating districts/schools will be expected to implement certain programs and supports that will help the school prepare for turnaround implementation during the following school year. At the high school level, these programs and supports include implementation of the EXPLORE and PLAN assessments in 9th and 10th grade (which is funded by the state), implementation of a Response to Intervention model, professional development and training on data analysis, and identification and evaluation of all existing instructional and professional development programs at the school.

For the 2010-11 school year and each year thereafter, ISBE will establish new eligibility parameters for a subsequent cohort of schools to participate in the Priority Schools initiative (subject to the availability of federal and state resources for the new cohort). Each new turnaround cohort will participate in a similar process of planning and preparation during the school year selected, with full implementation the following year.

Unless a district selects to engage in a turnaround approach led by a school management organization (SMO) with a long-term role in managing the school, the ultimate objective of the Priority School Initiative will be to transition responsibility back to the district with less state oversight. Every turnaround plan will establish specific metrics for success, (based on both objective measures and other factors identified in the planning process), with an expectation of significant gains in student achievement over the four-year period of implementation on a pathway to AYP. For schools that achieve those metrics, the districts will be expected to continue the elements of the turnaround plan that led to the school's achievement success until the school meets AYP. However, ISBE will decrease its role in overseeing that implementation. For schools that do not achieve the specified metrics for success, ISBE will take one or more of the following actions: (i) require a change in external supporting organization; (ii) put in place an oversight authority to oversee the implementation of the turnaround plan; or (iii) undertake a state intervention authorized pursuant to Section 2-3.25f of the School Code, 105 ILCS 5/2-3.25f (as further described in Section 10.1).

10.3 Has the state proposed to limit the number of schools that receive the most substantive and comprehensive interventions? If so, has the state provided an educationally sound justification or rationale for this capacity cap?

The type of interventions proposed for Priority Schools will take a high level of state commitment. ISBE believes it is imperative that this initiative begin with a manageable cohort of schools, so that the state can build capacity for working with larger numbers. It will also require the building of a statewide consensus that dramatic action is needed to improve student achievement within these schools. By focusing on the "bottom performers" based upon the overall percentage of students meeting and exceeding state standards, ISBE can build consensus for action in a cohort of schools where no reasonable observer can deny the need for dramatic intervention.

The work required in Priority Schools can also be expensive. Experience to date with turnaround initiatives in large urban districts suggests costs in the range of \$250,000 to a million dollars per year over the first three years. ISBE will expect participating districts to meaningfully participate in the cost of turnaround, but a state investment will be required for the work to be done effectively. ISBE will seek state funding and outside foundation help to supplement available federal funds. However, ISBE will not know until the start of each fiscal year what funding is available to add additional schools to the Priority Schools initiative. Therefore, ISBE needs the ability to limit the number of schools eligible for the Priority School initiative to ensure available resources can support the types of interventions required for under-performing schools.

The surest formula for failure of the Priority Schools Initiative is for ISBE to dilute its management capacity and funding resources over too large a number of schools. ISBE is proposing a new state model for intensive action in its lowest-performing schools. It must be able to implement the initiative in a focused and measured way, while building capacity over time to work with larger numbers of schools and districts.

10.4 How has the state worked with its school districts to ensure that school districts are implementing interventions for the lowest-performing schools?

Some Priority Schools will be in large districts with hundreds of schools, whereas others may be literally the only attendance center in their district. Some Priority Schools will be in districts with strong administrative, leadership, and instructional capacity to implement change, but others will be in districts that are unable to manage the process of turnaround. Accordingly, district capacity will be an important variable for ISBE in administering the Priority Schools program, and will be addressed when ISBE defines its relationship with the district for turnaround implementation.

As part of its implementation, ISBE will develop a protocol for determining the strengths and weaknesses of the district specific to turnaround implementation, and will use this analysis for allocating roles and responsibilities between ISBE, the district, and (in most cases) an external partner organization. If district capacity is strong, the district will be able to manage the turnaround implementation and work directly with an external partner organization with relatively state oversight. Where district capacity is weak, ISBE will

ensure the turnaround plan at the school level is coupled with necessary capacity building, interventions, and oversight at the district level.

ISBE expects that almost all of the districts with Priority Schools will either be in district corrective action or district improvement status (thereby allowing ISBE to accelerate corrective action under NCLB). ISBE will leverage its corrective action authority under NCLB to ensure districts are undertaking all necessary action at the district level to successfully implement the turnaround plan. ISBE has developed an internal process across various agency divisions (including federal programs, Career and Technical Education, Special Education, English Language Learners, Curriculum and Instruction, and School Business and Supports) to identify and address all instructional/compliance concerns the agency has with a district identified for corrective action. ISBE will apply this same process to all districts with schools participating in the Priority Schools Initiative to help ensure there is sufficient capacity at the district level to sustain significant improvement at the school level.

IV. ADDITIONAL QUESTIONS

A. Differentiation Data Analysis

Below, Illinois addresses the questions related to data analyses in the U.S. Department of Education's Peer Review Guidance.

- i. Has the state provided the data analyses that were used in developing the state's proposed method of differentiation? Yes, see Core Principle Number 2 and Focused and Comprehensive Statistics Summary in Appendix (c).
- ii. Has the state provided evidence, including any available statistical modeling, to support the rationale for the proposed method of differentiation? Has the state provided any available evidence to provide a justification for the method and need for differentiated accountability? Yes, see Core Principle Number 4, question 4.2.
- iii. Has the state provided the total number of schools that would be in each phase and category of improvement, using prior year data as necessary, under the differentiated accountability model? Yes, see Table 4.2.A.
- iv. Has the state provided an analysis, using prior year data as necessary, on the overall academic achievement of schools in each phase and category of improvement? Yes, see the School Information by Category and Phase of Improvement chart in Appendix (c).

- v. Has the state provided an analysis, using prior year data as necessary, on the academic achievement of schools in each phase and category of improvement disaggregated by the following:
 - a. Student groups (major racial/ethnic groups, students with disabilities, limited English proficient, and economically disadvantaged). Yes, see the School Information by Category and Phase of Improvement chart and the AYP Subgroup Summary by Category chart in Appendix (c).
 - b. Urban versus suburban versus rural schools – Please see the map referenced in Appendix A.
 - c. Large versus small schools – Yes, see the enrollment column in the School Information by Category and Phase of Improvement chart in Appendix (c).

- vi. Has the state provided evidence, including any statistical modeling, to demonstrate the rationale for the proposed method of differentiation; or provided any empirical evidence or data models to provide a theoretical justification for the method and need for differentiated accountability? Yes, see Core Principle Number 2 and Focused and Comprehensive Statistics Summary in Appendix (c).

- vii. Has the state provided data regarding teacher quality for schools in each phase and category of improvement? Yes, see the HQT column in the School Information by Category and Phase of Improvement chart in Appendix (c).

- viii. Has the state provided the number of students enrolled in tested grades in the state disaggregated by student group and the number and percent of these students included in AYP calculations at the school and school district level? Yes, see 2007 State Report Card, pg. 7 in Appendix A.

- ix. Has the state provided the total number of schools in the state and the number of schools for which AYP determinations were made? There are over 4,000 public schools in Illinois. AYP determinations are made for every school. Those that did not make AYP are included in the State Academic Achievement Informational Chart in Appendix C.

B. Annual Evaluation Plan

Illinois proposes a two-pronged monitoring system for the implementation of the strategies in this proposal. RESPRO support teams currently monitor electronic school improvement plans, with permission from the LEA, on the state's Illinois Interactive Report Card (IIRC) website. Each School Improvement Plan (SIP) submitted via the IIRC is first reviewed by the RESPRO School Support Team working with the school. This review generates a form detailing how to address the areas that caused the school to be placed in school improvement status and identifies strategies to resolve the identified issues. Identified interventions must be researched-based to address the deficit area(s) that has caused a school to be placed in improvement, corrective action, or restructuring status, such as reading/English language arts, mathematics, and the implications of the various identified subgroups. This forms the foundation of the school improvement plan which details the expectations and action items to address the school's academic or system needs. ISBE

staff review the school improvement plan and the information provided by the RESPRO to determine how the school improvement plan should be monitored. The ISBE reviewer completes the monitoring form on the website and either endorses the school improvement plan or requests that additional information be added. Most of the school improvement plans are endorsed upon receipt due to the review of data and assistance with plan development provided by the RESPRO School Support Teams.

In addition, ISBE is in constant communication with schools and districts through the RESPRO to review and discuss the strategies and best practices being implemented. Collaboration with outside experts will also be used for capacity building and professional development to expand exposure to effective interventions. On-site monitoring and technical assistance is provided by the RESPRO School Support Teams and ISBE's External Assurance Division. Improvement to the monitoring and technical assistance offered by RESPRO and the External Assurances Division, and the connection to ISBE's programs staff are underway. ISBE and RESPRO staff also review the academic achievement of schools receiving support to determine if the activities have resulted in improved student achievement. Schools that are showing lack of improvement or commitment to the process receive targeted assistance from ISBE to determine if the SIP needs to be altered or if more intensive interventions are necessary. To engage in thorough evaluation of the differentiated accountability pilot and priority schools initiative, ISBE plans to contract with an evaluator to collect outcome data and analyze and report on methodology, interventions, and implementation issues.

If approved, ISBE will also fully cooperate in the U.S. Department of Education's evaluation of the differentiated accountability model, and provide data to show how student achievement has differed prior to and after the implementation of the pilot.

V. CONCLUSION

The Illinois State Board of Education appreciates the flexibility offered by ED through the NCLB Differentiated Accountability Pilot. Illinois hopes its differentiated accountability proposal will provide the public with a better understanding about school and district performance. ISBE also believes this proposal will assist in directing interventions and resources to best impact student outcomes. As described in this proposal, Illinois' proposed changes will infuse corrective action strategies earlier in the improvement process, and includes an innovative, yet simple, model of differentiation. ISBE's intervention model will build on promising national best practices and seeks to establish a focused state approach for dramatically improving student achievement in the state's lowest-performing schools.

ISBE believes the strategies outlined in this proposal will help the State of Illinois improve upon its current accountability system, and thereby help the State, districts, and schools improve student achievement and close the achievement gap. ISBE looks forward to addressing any questions ED may have regarding the strategies described in this proposal.

VI. APPENDICES

- Appendix A: Illinois' Assessment and AYP Information (Annual Measurable Objectives, 2007 State AYP Status, 2007 State Report Card, , Map of schools not making AYP for 3 years by county)
- Appendix B: Illinois' Reporting Requirements (105 ILCS 5/10-17a; related ISBE 2007 Press Releases; Sample School Report Card; Sample Report from the IIRC website)
- Appendix C: Illinois' Supporting Data