



October 7, 2016

Dr. Tony Smith  
State Superintendent  
Illinois State Board of Education  
100 W. Randolph, 14-300  
Chicago, Illinois 60601

Dear Dr. Smith:

Thank you for the opportunity to offer comment on the first draft of your plan for the Every Student Succeeds Act (ESSA). We appreciate the collaborative approach you and the agency have taken throughout this process as Illinois moves toward a fair accountability system that recognizes outstanding schools, supports schools that are struggling, and maintains a strong focus on student learning.

We have three general recommendations upon which we elaborate below:

1. Use growth as a significant factor in both elementary and high school accountability systems.
2. Maintain NCLB's focus on achievement of subgroups.
3. Require targeted support for schools that are struggling the most.

*Use growth as a significant factor*

The accountability system should be exceptionally fair to schools and students. Proficiency is not fair because it penalizes schools with students who start further behind. Similarly, significantly weighting inputs, such as access to programs and funding, is unfair because it also disadvantages lower-income districts. We support:

- **Adding PSAT in high school.** The SAT given once in high school as the only statewide high school assessment is insufficient. Illinois needs a high school growth model. Adding the PSAT in high school would provide this. (Section 2.2 (A))
- **Weighting growth more than either proficiency or the fifth indicator.** The biggest flaw in No Child Left Behind was that it based a school's rating 100% on the proficiency of its students. This more accurately measured the socioeconomic status of a school than the influence the school had on student learning. If we don't emphasize individual student growth significantly more than proficiency, we will replicate the failures of NCLB. Similarly, every student deserves access to pre-school, wraparound programs, college-ready coursework, enrichment, and an overall well-rounded education, but overly weighting these inputs also penalizes the most underfunded districts. (Section 3.1)



- **Measuring growth-to-proficiency.** To the extent allowable under federal regulations, Illinois should use a growth-to-proficiency model (such as Value Tables) as a portion of its proficiency measure. Along with being fairer, this also minimizes “bubble syndrome.” (Page 21)
- **Using growth toward English Language proficiency.** In the required English Language Proficiency measure, a growth-to-proficiency model better isolates the influence of the school on the student’s language growth. (Section 3.1)

*Maintain NCLB’s focus on achievement of subgroups.*

The biggest benefit in No Child Left Behind was that it required transparency of subgroup performance, which led to progress in closing academic achievement gaps.<sup>1</sup> Please make sure that the new system maintains that important focus. We support:

- **Factoring achievement of subgroups significantly into the overall rating.** Demonstrating success within each subgroup should be given significant weight. This should not be an asterisk or a footnote to an otherwise high rating; the system should never allow a school to get the highest rating if it is failing any of its student populations. (Page 20)
- **Including a new subgroup of former English Learners.** As ELs transition from bilingual programs, measuring their continued progress provides important feedback on how well their bilingual programs prepared them for success in mastering grade-level content.
- **Reducing n-size to ten.** Illinois has one of the highest n-sizes in the country, which can mask achievement gaps when there are smaller numbers of students in individual subgroups. We should reduce our n-size to ten.

*Require targeted support for schools that struggle the most.*

ISBE has done a tremendous job involving stakeholders in the conversation about designing the accountability system. However, without a meaningful system of supports, the accountability system will fall short of having demonstrable impact on student outcomes. We support:

- **Using contextual data to develop appropriate interventions and supports.** Determining the accountability system has comprised the majority of the time of ISBE’s stakeholder working groups and the IBAM committee. This makes sense because it is critical to get the identification right and provide transparency to parents and communities about school quality. We look forward to broader conversation about individualized supports and interventions based on a comprehensive needs assessment for struggling schools as the process continues.
- **Allocating funding only to districts funded below adequacy.** Because the state’s resources to support interventions are so limited, we support an additional criterion in the formula for allocation of school improvement funds. Most school districts identified for targeted and comprehensive

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<sup>1</sup> “Pacts Americana: Balancing National Interests, State Autonomy, and Education Accountability,” Bellwether Education Partners, June 2015.



support will be severely underfunded and deserve additional funding for implementation. Some districts that are adequately funded already are also likely to need supports and interventions, and we believe existing district resources should be used to fund those efforts so that the additional federal funds can be focused on schools with a greater need for more investment. We also support the broader work of the Illinois School Funding Reform Commission, but see this as a parallel conversation to the ESSA plan development.

- **Requiring state support and capacity-building for districts without strong plans.** The draft plan says that: “Stakeholders were emphatic that there should be a minimum level of quality to the improvement plans, evidence of readiness to implement, and that the plans should be required for schools to receive more than the base-equitable amount needed for planning. When pressed to consider what was best for students in schools whose plans did not meet such criteria, respondents stated that if a school could not even create a solid plan for improvement, it was not going to be able to use any funds it received effectively.” But we believe it is unfair to penalize those students. In such cases, it may be appropriate for the state to take on a more significant role. Moving forward, consider what alternative options make sense to support struggling schools even if there are leadership deficiencies or capacity issues at the school- and district-level, possibly including on-site technical assistance, peer coaching opportunities, or other structural changes. (Page 29-30)

Thank you again for the opportunity to provide feedback on your draft. We looking forward to continuing to work with you and your staff as development of the plan continues.

Sincerely,

A handwritten signature in black ink, appearing to read "Mimi Rodman", with a long horizontal flourish extending to the right.

Mimi Rodman  
Executive Director