



December 23, 2016

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

Dear Dr. Smith:

The comprehensive approach you are taking to collect stakeholder feedback in connection with Illinois's implementation of the Every Student Succeeds Act ("ESSA") continues to be a model process among states.

Stand for Children is a member organization representing parents in several communities across the state. Our parent members travelled to Washington D.C. twice to participate in the public conversations around the reauthorization of No Child Left Behind and urge a continued focus on educational equity. With the passage of ESSA, they have closely followed the work here in Illinois and participated in several listening tours. Stand for Children is grateful for the opportunities you and your staff have provided for us to share our perspective 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 feel that several positive changes are evident in the second draft. **First, thank you for proposing an "n-size" of 20.** Illinois's current n-size of 45 is among the largest in the country. Federal regulations now suggest, and many states currently, use n-sizes of 20. We recognize that there is a balance to strike between the reliability of data and inclusion of subpopulations of students, and we appreciate your efforts to move toward more inclusion. **We also appreciate your creation of a new "former English Learner" subgroup.**

We hope you will consider these suggestions to strengthen your next draft:

1. **Incorporating subgroup scores.** We continue to have concerns with the way in which subgroup ratings will be incorporated into summative scores. The draft proposes several options for weighting the required and other indicators, but none include suggestions for how subgroup weights would be applied. As we said in our comments on the first draft: "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.” There are several ways to accomplish this and we are open to variations on any of these:

- a. The Education Trust has proposed that each subgroup be given equal weight within each indicator. For example, if student growth counted for 40% of the total score, each of eight groups (all students, African-American, Latino, White, Asian, low-income, ELs, and students with IEPs) would count as 5% of the total score.
  - b. Another option would be to count the all-student score for half of the total for each indicator and to divide the remaining half among under-represented subgroups based on the percentage of the population of each. For example, if student growth counted for 40% of the total score, the all-student score would count for 20% of the total and 20% of the remainder would be divided among subgroups, each weighted based on percentage of the total population comprised by those subgroups.
  - c. A third option would be to calculate summative ratings for all students and then undergo another round of analysis before applying the summative score. Districts that fail to demonstrate success within a subgroup would be moved down one rating level. This is less cohesive than the above options, but it would comply with the federal regulation requirement that no school that fails its subgroups can earn the highest rating.
2. **Weighting growth more than proficiency or any other indicator.** Your second draft expresses a commitment to equal weighting of proficiency, growth, and English Learner proficiency. It also requests feedback on the overall split between these and other indicators. Under these parameters, it is possible that growth could count for just 17% of the total, which we believe does a disservice to schools that drive substantial learning gains despite significant socioeconomic challenges. Furthermore, both the value tables and growth-to-proficiency growth models double down on measuring proficiency. We support:
- a. **Including the 70/30 split among required and other indicators.** The “other” indicators under consideration are worthwhile practices for which schools should strive in order to drive student learning, but we don’t want to mask the thing that matters most (student outcomes) with things that are designed to get those results (inputs). Focusing the majority of the weight on growth and proficiency will better identify and focus scarce resources on supporting the schools that most need it.
  - b. **Selecting a growth model that measures individual growth.** If proficiency were under-weighted, selecting a hybrid growth model that includes both individual growth and growth-to-proficiency would also make sense. But using proficiency and growth-to-proficiency leaves little incentive to improve outcomes for gifted students and little reward for improving outcomes for students far below grade level.



- c. **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.
3. **Prioritizing Diverse Educator Pipelines.** We appreciate that ISBE is waiting for recommendations from the Teacher and Leader Effectiveness (TLE) committee of the P-20 Council to finalize its Title II recommendations. We are following the committee's work and are eager to see its final recommendations around residency programs and academies, which we hope will include prioritizing recruiting diverse candidates to these programs. We also support funding for the Diverse Educator Exchange. We hope your final ESSA plan will include a commitment to building the racial, gender, and linguistic diversity of Illinois's teacher.
4. **Expediting the timeline.** Your draft proposes establishing a three-year baseline for graduation and growth data from 2017-2018 – 2019-2020. Again, we understand that there are trade-offs to consider between having the most accurate data and providing intervention more quickly. In this case, we hope you will consider a more expedited timeline so that we can identify schools more quickly and get right to work supporting their students. We have data from previous years that can be used to get a jumpstart on calculating baseline data.
5. **Improving the supports and interventions process.** This is the most important piece of the system, but it seems to be the one that has had the least amount of stakeholder engagement. We continue to have concerns about those districts that lack expertise and capacity to put together and implement a strong plan. We also suggest that the ESSA plan require deeper intervention for schools that fail to demonstrate improvement after a specific amount of time to implement their plans. In addition, because we have such an inequitable funding system overall, we hope that ISBE's allocation of Title I set-aside funds to support schools will only provide additional funds to districts that are under-resourced. Fully-funded districts that need targeted or comprehensive support should be required to fund their improvement plans with their existing resources.
6. **Summative scores.** Parent-friendly ratings are important so that the people who depend on our public schools can easily understand the quality of their child's school. We support summative ratings alongside an easy-to-understand dashboard of information that clearly shows families how their schools are doing overall and in key areas. Given the number of ratings a school may have (for example, a 2+ from CPS, a 6 from greatschools.org, a "growing" from the state, and a "targeted support" from the DoE), consider continuing with the ratings of "comprehensive support" and "targeted support" allowed in the final regulations and expanding the categories for those schools not identified for support (for example, "approaching, meeting, exceeding, and excelling).



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". The signature is stylized and includes a long horizontal line extending to the right.

Mimi Rodman  
Executive Director