

## **PROPOSED ED-RED Comments to ESSA State Plan Draft #2**

### 1. Student Academic Assessments

As noted in our previous comments on draft #1, many of our districts remain concerned over the continued use of PARCC to assess ELA and mathematics in grades 3-8. Some of the concerns outlined were the lack of continuity and alignment between the assessments administered in elementary and secondary grades, and that PARCC results are not meaningful to schools and parents. For these and several other reasons, the weight that many of our districts give these test results have been greatly diminished. We recommend that ISBE work to identify a reliable assessment for elementary feeder districts that adequately measures progress from K-8 and can be used through a student's transition to high school.

We understand that a new assessment would have to first undergo a lengthy approval process to become an "ESSA assessment" (i.e. peer review, review by the Department of Education, etc.). However, given that the State's contract with PARCC ends in 2018, we urge ISBE to research and consider the K-8 assessment that SAT is in the process of developing, the NWEA MAP test (which we also understand is being adapted to meet ESSA assessment eligibility requirements) and/or any other assessment that meets the above criteria. Once such an assessment is identified, we need to use this assessment over a period of time so that we are able to use the data in a meaningful way that allows us to accurately measure student growth.

### 2. Student Academic Assessments

Illinois middle schools are currently provided with the option of using PARCC high school course-based assessments to assess their students taking advanced mathematics courses (e.g. Algebra I when a student is in middle school). Given that many of our districts value using a uniform test across each grade level and would be opposed to administering multiple tests to students within a grade level, we want to ensure that this option remains just that, an option. The ultimate decision of which test to administer must be left to the local school district.

### 3. Student Academic Assessments (Illinois Science Assessment)

We want to ensure that the Illinois Science Assessment aligns with the new Illinois State Standards for Science, also referred so as the NGSS standards. Our districts' teachers

teach to those standards and we want to ensure that our students are accurately assessed in this area. Additionally, test results need to be timely in order to inform teaching practices. We have not received timely results on last year's Science assessment which is eroding out our districts' confidence in this assessment.

#### 4. Student Assessment for English Language Proficiency

We support ISBE's current proposal to convene stakeholders for the purpose of considering the WIDA recommendations and have that the group submit recommendations to ISBE. However, given that the final draft of the State Plan is due in July, 2017, we would urge those recommendations to be made sooner than June 30, 2017. We also request to have a representative from ED-RED be included in those meetings.

#### 5. Universal Design for Learning (UDL) – Mathematics Testing On-line

Under ESSA's requirement for Universal Design for Learning, ISBE must describe how its state assessments "ensure that each and every student can access the content and constructs being measured in a way that meaningfully documents what they know and are able to do." As noted in our previous comments, for any math assessment that requires students to demonstrate their mathematical thought process, students must be provided with the option of writing down their mathematical thinking in written format. Currently, students taking their tests electronically must also show their work electronically. A written option is particularly important for students in grades 3-8 who are regularly encouraged throughout the school year to show their thought process on paper.

For those districts that have been able to incorporate technology into their mathematics curriculum during the school year, students showing work electronically may not be as much of an issue. However, for schools where this has not occurred, students that are required to demonstrate their mathematical thought process electronically are not being afforded the opportunity to be measured in a way that "meaningfully documents what they know and are able to do", as required by ESSA. For these students, as several of our districts have noted, they become confused by having to show their math thought process electronically and become frustrated in accomplishing this task.

Again, we would want to ensure that these written documents are being used for evaluation and assessment purposes so that students can earn credit for their

demonstrated thinking, reasoning and modeling. Otherwise, the administrative oversight required for a written option would not be worthwhile.

#### 6. Student Assessments – Language Other than English

Currently, only the math portion of the PARCC assessment is trans-adapted into Spanish. ISBE noted that it received comments suggesting that content assessments be made available in languages other than English when 30% or more of the EL students speak the same language. We support providing EL students with the option of taking an assessment in their native language or English; provided, 1) the choice is left to the student as to which language he or she prefers to be assessed; and 2) school districts are not responsible for any additional costs of trans-adapting the assessment into the various languages which must be administered.

However, setting the threshold at 30% of the EL students at a given school seems to be arbitrary and would vary greatly across schools depending on the total number of EL students at each school. We would recommend that ISBE consider using the subgroup number (see comments below regarding appropriate subgroup number) or a possible combination of 30% of the total EL students in addition to reaching at least the subgroup number.

#### 7. Accountability – College and Career Readiness Definition

ED-RED is opposed to the definition of College and Career Readiness adopted by ISBE at its September board meeting. That definition is too restrictive, will not serve the interests of our schools and students and does not reflect the national, research-based model that District 214 has worked on in length, in conjunction with AASA.

#### 8. Accountability - College and Career Readiness Definition

ED-RED believes that the College and Career Readiness framework presented by Dave Schuler and Kevin O'Mara on behalf of IHSDO at the November 18 ISBE Board meeting is a stronger model. While we support it in concept, we would make the following recommendations:

- a. We understand that the number of students that meet one of the 4 College and Career Readiness pathways (A, B, C or D) would be added together and reported as the aggregate number of students that meet any College and Career Readiness Pathway. We support that. We do want to clarify that it is not the intention of ISBE to also report the number of students that meet each pathway

designation. Given that every one of these pathways is an evidence-based indicator of College and Career Readiness, we want to ensure that the intent is only to report them in the aggregate.

- b. Additionally, given the connotation that letters (A, B, C and D) have in the education world, we are concerned that by labeling each pathway with a letter, the public might infer that one pathway is more beneficial than others. We would recommend ISBE consider using descriptive words to identify each pathway.
- c. We understand that the Seal of Biliteracy was not included as an academic indicator because there is currently no research to support its inclusion, as required by ESSA. However, many of our districts feel that the Seal of Biliteracy is a valuable achievement for students and should be included. We urge ISBE to research its effectiveness and to include into the State Plan, a process that allows for indicators to be added (and removed, if necessary) from year to year. While consistency in the framework is important, we want to ensure that new indicators that are supported by research can be incorporated into the framework.
- d. As it relates to Pathway A, we believe that a minimum composite score should be used for the ACT and SAT, rather than requiring students to reach a minimum score for each of the subject areas (i.e. the proposed scores for ACT are: English – 18; Math – 22; Reading – 22 and Science – 23). The ACT composite score takes into account all subtest scores and research shows that the composite is a stronger measure of overall performance. The only individual subtest scores that have been found to be a predictor of college performance are the English and math subscores. Because individual reading and science subscores have not been shown to be a predictor of college performance, those cut scores are not as meaningful and, therefore, should not be the determining factor as to whether a student is successful in this particular College and Career Pathway.

#### 9. Accountability – Student Growth

As noted in the State Plan, we agree that each of the proposed models have strengths and weaknesses. We would urge ISBE to continue considering the Student Growth Percentiles, Value Table Models, as well as hybrid models of each. The Growth to Proficiency model is the least appealing of the models presented.

While there are concerns with all models, we feel it is critical that:

- 1) any student growth model does not serve to penalize districts that are not adequately funded and have high subgroup populations (i.e. low income, EL, etc.); and
- 2) student growth measurements are dependent on a student's initial score.

#### 10. Accountability - Subgroups

We recommend that ISBE use a subgroup ("n") number of 30, rather than 20. The final federal regulations allow states to set the highest "n" number to be used at 30 (and possibly higher, if the State can justify it). The threshold of 30 for a subgroup is generally considered the minimum sample size for statistical analysis. Setting subgroups smaller than that can result in less precise data. Because the sample size in ESSA could play a big role for accountability purposes, including the determination of what districts are identified as needing targeted supports, it is critical that subgroup data be statistically significant.

We understand that some stakeholders believe that the "n" score should be 20 due to the requirement that when the number of students in a school who all speak the same language reach the number 20, it triggers the requirement that the school provide Transitional Bilingual Education (e.g. instruction in core content areas in the home language and English). While this rationale may make sense for the EL subgroup, it does not make sense for the other subgroups.

ESSA requires that the subgroup "n" number be the same for all subgroups (EL, Special Education, low income, etc.). We feel that for the benefit of all subgroups affected, the subgroup size needs to be set at a level that ensures statistically significant results.

#### 11. Accountability – Other Indicators for School Quality and Student Success

In ISBE's 2nd draft of ESSA, it indicated that 6 non-academic indicators had been identified by in comments. However, it was not clear whether ISBE had also narrowed the initially presented 40+ indicators down to these six indicators. Assuming that those are the 6 indicators we are looking at (in addition to one other non-academic indicator that was mentioned elsewhere in draft #2), our position on each is below:

- a. Chronic Absenteeism – our districts that have looked into their own data on this issue and have found that chronic absenteeism is highly correlated with the district's low-income students. We know that there is research that shows that

an aggressive and intensive approach to working with these students and families can have positive results.

Our concern is that currently, the State significantly underfunds our schools and has been doing so for years. While we have been working with legislators and stakeholders over the past couple of years on the development of the evidence-based formula, the legislature would still need to identify how to fund such a model. In the absence of adequate funding for all schools in Illinois, we are concerned that using this indicator would only serve to penalize schools with high low-income populations that are not adequately funded. For that reason, we do not support the use of this indicator.

- b. College and Career Readiness – We support that use of this indicator subject to comments submitted in a separate section of this document. We also note that the AASA is working on a similar model for K-8 schools. Given that this K-8 model is still in the development phase, we cannot comment on it at this time. However, we are eager to review this model once developed and urge ISBE do the same.
- c. 8<sup>th</sup> grade on track/9<sup>th</sup> grade on track – In principal, we support the use of this indicator. However, in the past, our districts have had issues resolving their calculations with ISBE’s calculations of this measure. If this indicator is used for accountability purposes, there needs to be improved transparency and communications with school districts on how ISBE will measure this indicator.
- d. School Climate Survey – We oppose the use of this indicator. Any indicator must measure schools across the State uniformly. Currently, districts have the option of using 3 separate climate surveys. We support districts continuing to have this choice to find a survey that meets their needs. As you may know, many issues arose when our districts were required to use the 5 Essentials survey. The 5 Essentials survey still contains assumptions about how schools are organized and governed that simply don’t apply to many of our districts.
- e. Growth toward college and career readiness (as measured by 9<sup>th</sup> grade on track and graduation rate) – we are unclear on how such an indicator would work and currently oppose this indicator.
- f. K-2 readiness indicator – We are opposed to using the Illinois KIDS assessment as an indicator given that it is highly subjective and consists of self-reported data by districts. If used well, the KIDS assessment can provide meaningful data for school districts to use internally. However, if this assessment were to be used as an indicator within a State accountability system, the quality of the data reported could be severely compromised. Without additional information on

what other assessment (other than KIDS) or what data would be collected to assess K-2 readiness, we cannot support using this indicator at this time.

Additionally, for the non-academic indicators, we strongly urge ISBE to use a minimum of 2 such indicators.

Finally, we would note that many of our high schools districts are voluntarily giving the PSAT in 9<sup>th</sup> and/or 10<sup>th</sup> grade so that it can measure student growth at the high school level. If ISBE were to require all high school districts to administer the PSAT in 9<sup>th</sup> and/or 10<sup>th</sup> grade *and the State pays for this test(s)* (emphasis added), this measure of student growth could be used at the high school level as a non-academic indicator (NOTE: our understanding is that ESSA would not allow for it to be used as an additional academic indicator).

## 12. Accountability – Weighting of Indicators

ESSA requires that academic indicators (student growth, attainment, graduation rate, EL proficiency) be given “greater weight” than the other non-academic indicators. ISBE asked for feedback on 3 possible distributions: 60% academic/40% non-academic, 70% academic/30% non-academic, and 51% academic/49% non-academic. With the caveat that it is extremely difficult to recommend an appropriate distribution for these indicators without knowing what the final non-academic indicators are and that our position may change depending on that determination, we provide the following comments:

- We would recommend using either a 60% academic/40% non-academic or 70% academic/30% non-academic distribution. While it is important that the accountability system take into account the “whole child” and schools be given credit for successes in non-academic areas, we are opposed to an accountability system that could result in a district with strong academic performance indicators scoring lower than a district with substantially lower academic performance indicators. For this reason, we recommend using a minimum of a 60% weight for academic measures.
- In the examples provided by ISBE in its Draft #2, ISBE gave equal weight to each of the 3 academic indicators. For example, for a K-8 district using a 60% academic/40% non-academic distribution, ISBE used 20% - attainment, 20% growth and 20% EL proficiency (with 40% attributed to non-academic indicators).

For the weight distribution *within* the academic indicators and *within* the non-academic indicators, we would recommend the following:

- Academic Indicators:
  - We understand the importance of measuring the success of our EL programs for our students. However, all of our schools have varying percentages of EL students. We would recommend for some type of adjustable percentage for the EL indicator depending on the percentage of the EL population of the school. However, we understand that ESSA may not allow for different weights to be used for the EL indicator based on those percentages. If that is the case, we believe that setting the EL proficiency weight for all schools at 10% would be appropriate and would serve to ensure that schools are held accountable for this indicator.
  - As it relates to the EL accountability indicator itself, we believe that within that indicator, growth should be given significantly more weight than attainment (i.e. 80% EL student growth/20% EL attainment).
  - As noted in the second draft of ESSA, many stakeholders, including ED-RED, commented that ISBE should put a greater weight on growth over proficiency. However, ISBE stated in draft #2 that it is committed to honoring “both attainment and growth at equal weight.” We understand ISBE’s commitment to considering attainment, but strongly urge ISBE to give greater weight for student growth and less weight to attainment.
- Non-Academic Indicators
  - Given that the College and Career Readiness indicator contains many “sub-indicators” (i.e. attendance, assessment score, grades, co-curricular activities, etc.), we believe this indicator should be given greater weight than the other non-academic indicators.

### 13. Accountability – Goal Setting – Long Term and Interim Goals

ISBE proposes using 2032 as the target year for each school to meet each of the long-term goals (see below). Over the first three school years (2017-18, 2018-19 and 2019-20), a baseline would be established for each school. Between 2020-2021 and 2031-32 interim goals would be mapped every 3 years up through the 2032 target year. Our comments to this plan are as follows:



#### GENERAL COMMENTS:

- We support the concept of establishing a baseline for each school over an initial 3-year period.
- We support using 3 years for establishing interim goals.
- We support setting the target year no earlier than 12 years from the baseline school year.

#### COMMENTS ON PROPOSED LONG-TERM GOALS

- All kindergartners are assessed for readiness  
Comment: We are opposed to this goal given that: 1) there currently is not an appropriate objective assessment available (or, to our knowledge, one that is being developed) to assess kindergartners [since ESSA requires ISBE to revisit the State Plan every 4 years, this goal could also be revisited then if one becomes available]; and 2) it is unclear whether, under this goal, school districts would be held accountable for their students' performance on this assessment. Given the concerns with the KIDS assessment (see above) and that such an assessment would determine the level and extent of experiences that students have prior to entering our school buildings, holding districts accountable for such a measure would be extremely problematic.
- As it relates to the proposed proficiency goals of: 1) 90% or more of 3<sup>rd</sup> grade students are reading at or above grade level; 2) 90% or more of fifth-grade students meeting or exceeding expectations in mathematics; 3) 90% or more of 9<sup>th</sup>-grade students are on-track to graduate with their cohort; and 4) 90% or more of students graduate from high school ready for college or career, we offer the following comments:
  - With the exception of using 90%, rather than 100%, we fail to see how these ESSA goals are significantly different from NCLB.
  - We do acknowledge and appreciate that ESSA lacks the level of punitive consequences seen in NCLB when a school failed to meet AYP. However, focusing long-term goals on attainment will continue to hurt districts that have high mobility rates, those that are underfunded by the State, and those with historically underserved populations. Given the emphasis on growth throughout the State Plan, we would strongly urge the Board to develop some long-term goals that reflect and highlight schools gains in this area.

#### 14. Accountability – Meaningfully Differentiation of Schools

It is difficult to ascertain ISBE's current position on summative ratings given that the final Federal Regulations were released after ISBE posted its 2<sup>nd</sup> draft of ESSA. We would note that while the final regulations affirmed that 3 summative "determinations" (rather than "ratings") be used, it clarified that those determinations could be the same categories of schools set forth in ESSA. Therefore, it could include: 1) those schools requiring comprehensive supports (lowest 5% of schools); 2) those requiring targeted supports (lowest 5% of subgroups) and 3) other schools. We support using these categories at the 3 required summative determinations.

As noted, ISBE released its 2<sup>nd</sup> draft prior to the release of the final Federal Regulations and stated that if 3 summative ratings were required, it proposed using "initial", "growing", "meeting" and "exceeding." While we agree that these categories are better than the use of letter grades or numbers assigned to schools, we strongly believe that it is critical to avoid any level of shaming for struggling districts, as was the case with NCLB. We feel that our recommendation above is the best way to do that, given the boundaries set forth in the Federal Guidelines.

Finally, we strongly support ISBE's commitment to using data dashboards to measure a school's periodic growth on indicators.