

Superintendent Report September 2016

This month's report from the superintendent includes the following topics for your review, discussion and consideration:

- A. NPR Report on Segregated School Boundaries
- B. *Every Student Succeeds Act* Information
- C. Personnel Counts Comparison
- D. Measured Progress & ECRA Assessment Timelines

A. Segregating School District Boundaries

Included with this report is an article from August 23, 2016 indicating that the border between Carbon Cliff-Barstow Schools and Geneseo CUSD 228 is the 10th most disparate, segregated border in the nation. The researchers built an algorithm that identified all 33,500 school district borders across the US and compared school age poverty rates. The table includes the district borders, by state, with the largest difference in child poverty rates from one district to the other. The comparative data to determine this discrepancy is the student percentage of students classified in poverty, then the median property value, and the median household income. (Statistically, keep in mind that the statistical value of 'median' means that there are an equal number of values above that line and below the line. If I took the set {1, 2, 4, 4, 7, 8, 9} the median value is 4, but the mean, or average, would be 5. It doesn't mean one statistical measure is necessarily better than the other, but without knowing the range, high, low value, etc we would not have a full picture.)

WQAD is planning to do a story on this boundary. The district is not at any fault or criticized for this boundary issue, it is merely a reality of demographics at the present time. I am not sure what the angle of this for a local news story, but by the time of the Board meeting we should know.

B. Every Student Succeeds Act

Approximately 20 months ago, President Obama signed the reauthorization to the Elementary and Secondary Education Act of 1965, and this new legislation was

called the “Every Student Succeeds Act” (ESSA). Unlike No Child Left Behind, this was very much a bipartisan effort, and now it is time for the Illinois State Board of Education to put together the state’s implementation plan. A draft has recently been made available on the ISBE website.

Here are a few highlights of information that may explain some of the changes from NCLB:

A. For 2016-17 districts are expected to continue programs that would have been required with NCLB. (We have none that apply to us.)

B. We no longer are held to a standard of “Highly Qualified” teachers, which is really a federal requirement, not one initiated in the state.

C. I have included a letter from our state superintendent, Dr. Tony Smith, and his appeal for some considerations from some of the more restrictive components of ESSA.

D. The ISBE has scheduled a second round of “Listening Tour” sites where citizens can hear and comment on parts of the Illinois draft plan for ESSA implementation.

E. The Illinois Plan still holds up PARCC as the 3rd-8th grade assessment for the State, which is not well aligned to the newly adopted SAT for 11th graders.

F. An accountability system must hold a at a minimum, four distinct indicators or student performance, measured for ALL students: a) academic achievement K-12, b) English Language Proficiency K-12, c) Student growth or another valid and reliable statewide academic, K-8, d) Graduation rate for high schools, e) At least one school quality or student success indicator.

One of the major concerns that is fairly widespread is avoiding simplistic metrics designed to rank order schools and districts for unreliable and invalid media comparisons. We will strive to have district representation at some of the listening tours. A calendar of the listening tour is included with this report.

C. Personnel Counts Report

Included in this report are some personnel count comparisons. It is always interesting to see the evolution of decreasing Geneseo 228 employees, but some increasing Henry Stark programming. While this isn’t a 1:1 correlation, it does speak to some change in disability identification and a more comprehensive

continuum of services provided here (for example, the Life Skills and Cross Categorical programs). It also speaks to the fiduciary responsibility that the Board of Education has meted out over the past decade. Since 2002-03 the district has increased 22 special educators split between D228 and Henry Stark employees. Overall the district now employs 64 fewer people than it did in 2002-03, a 17.5% reduction overall in staffing. (Enrollment has decreased approximately 11.5% over the same time period.) When you combine D228 teaching and professional support staff with Henry Stark teaching and professional staff, there were 206 FTE persons in 2002-03 and in 2016-17 we saw a combined 197 FTE teaching and professional staff. This is a 4.4% decrease in instructional staffing. Over the same time period the district employed 14 administrators in 2002-03 and there are 11 FTE administrators in 2016-17, which represents a 21.4% reduction.

The “numbers” members of the Board of Education may be interested in such data.

D. Measured Progress and ECRA Assessment Timelines

Measured Progress is an assessment company who employs the following mission: “The mission of Measured Progress is to improve teaching and learning by providing customizable assessment products and educational services. As we extend our capabilities to meet changing assessment needs, our not-for-profit company remains true to its founding philosophy: Assessment is a means, not an end. It’s all about student learning. Period.”

Our interest in Measured Progress and a possible partnership surrounds their ability to align with the new state-wide testing, SAT system. We know that the HS previously enjoyed using the EXPLORE, PLAN, ACT hierarchy to benchmark student progress for college and career readiness. We then piloted, but ultimately discontinued the Aspire testing for grades 3-8 when we were informed that ACT would no longer be the accepted state test.

We will be meeting with Illinois representatives from Measured Progress during the week of this September Board of Education meetings and we are also excited to hear that they are closely connected to the ECRA Group, which will assist our ability to accurately depict student growth.

Also included with this report is a chart listing our planned assessment program

to be utilized with ECRA for our student growth reports in 2016-17. The only change may be if we choose to use Measured Progress. The newly formed D3 team (merger between the Data Review Team and A-3) hopefully will be assisting in reviewing this assessment system so that we can accurately and appropriately gather faculty input into this decision-making process.

The Top 10 Most Segregating School District Boundaries

These neighboring school districts have some of the largest poverty differences in the country.

STATE	DISTRICT	POVERTY RATE	ENROLLMENT	MEDIAN PROPERTY VALUE	MEDIAN HOUSEHOLD INCOME
1. Michigan	Detroit City School District	49%	49,043	\$45,100	\$26,087
	Grosse Pointe Public Schools	7%	8,328	\$220,100	\$90,542
2. Alabama	Birmingham City School District	49%	24,858	\$86,100	\$31,217
	Vestavia Hills City School District	6%	6,762	\$339,000	\$81,352
3. Alabama	Birmingham City School District	49%	24,858	\$86,100	\$31,217
	Mountain Brook City School District	7%	4,477	\$558,900	\$130,259
4. Pennsylvania	Clairton City School District	48%	785	\$48,700	\$29,158
	West Jefferson Hills School District	7%	2,831	\$157,200	\$67,596
5. Ohio	Dayton City School District	47%	14,209	\$67,200	\$27,938
	Beavercreek City School District	7%	7,454	\$183,300	\$81,661
6. Arizona	Balsz Elementary District	51%	2,719	\$142,200	\$36,488
	Scottsdale Unified District	11%	24,866	\$349,700	\$67,699
7. Ohio	Dayton City School District	47%	14,209	\$67,200	\$27,938
	Oakwood City School District	7%	2,087	\$232,000	\$100,724
8. Ohio	Youngstown City School District	46%	5,408	\$46,900	\$24,807
	Poland Local School District	7%	2,078	\$154,800	\$63,568
9. Colorado	Sheridan School District 2	49%	1,583	\$150,000	\$37,446
	Littleton School District 6	9%	15,830	\$286,700	\$70,744
10. Illinois	Carbon Cliff Barstow School District 36	45%	309	\$96,300	\$32,273
	Geneseo Community Unit School District 228	6%	2,596	\$147,000	\$62,197

Source: EdBuild: "Fault Lines: America's Most Segregating School District Borders" (August 2016)

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K-12

The 50 Most Segregating School Borders In America

August 23, 2016 · 6:17 AM ET



CORY TURNER



Gustav Dejerl/Getty Images

The grass is greener ... if you're a student in Detroit, looking across your school district's boundary with the neighboring Grosse Pointe public schools.

Nearly half of Detroit's students live in poverty; that means a family of four lives on roughly \$24,000 a year — *or less*.

In Grosse Pointe, a narrow stretch of real estate nestled between Detroit and Lake St. Clair, just 7 percent of students live at or below the poverty line.

To recap, that's 49 percent vs. 7 percent. Neighbors.

Which is why a new report from the nonprofit EdBuild ranks the Detroit-Grosse Pointe boundary as "the most segregating school district border in the country."



SCHOOL MONEY

Why America's Schools Have A Money Problem

The report, called "Fault Lines," doesn't stop there.

"What we did is built an algorithm that identified all 33,500 school district borders in the country ... and compared their school-aged child poverty rates," says Rebecca Sibia, the founder and CEO of EdBuild.

From this comparison Sibia's team compiled a list of the 50 most segregating school boundaries in the nation — in short, the district borders with the largest difference in child poverty rates from one side to the other. In this case, "segregating" is being used to talk specifically about class, not race, though the two often overlap, especially in America's large urban school systems.

The Top 10 Most Segregating School District Boundaries

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Rounding out the top three on the Fault Lines list are the Birmingham City School District in Alabama and ... the Birmingham City School District in Alabama.

In fact, of Birmingham's 13 school district boundaries, six landed on EdBuild's list of the 50 most segregating. That's because the poverty rate of Birmingham's students is 49 percent, while the district is surrounded by several far smaller, far more affluent districts: Vestavia Hills (6 percent child poverty), Mountain Brook (7 percent), Trussville (10 percent), to name a few.

Birmingham's district lines weren't always a story of haves and have nots, at least not this glaring. Most of the affluent districts now bordering the city's schools were once part of the larger Jefferson County School District. But over the years, they have seceded, using their considerable property tax wealth to create new minidistricts.

Interestingly, Birmingham stands out not only because of its multiple appearances but because Alabama is the only Southern state on the list (unless you count Kentucky or Missouri). One reason for this, says Sibilias, is that in much of the South, county borders do double duty as school district borders, "and so there is less opportunity for intentional segregation."

In fact, Sibilias says, she and her team "were shocked. We honestly believed we were going to see a lot of this in the South and very little in the North."

Instead, the vast majority of states on EdBuild's list were Northern, with segregating school lines heavily concentrated in the Rust Belt, particularly Ohio. Dayton's schools have two borders on the list. Ditto Youngstown. Cleveland has four. As manufacturing jobs disappeared, so too did families that could afford to move, creating intense pockets of student poverty.

What can be done about it?

There are no easy fixes, owing in part to the U.S. Supreme Court.

In 1970, the NAACP sued the state of Michigan; its lawyers argued that Detroit's schools were still unofficially segregated more than 15 years after *Brown v. Board of Education* because of discriminatory housing policies meant to keep African-Americans out of the suburbs. The proposed remedy: a forced desegregation plan involving dozens of surrounding school districts.

But in one of its most controversial decisions, *Milliken v. Bradley* in 1974, the court ruled that these largely white, affluent suburban districts could not be forced to desegregate because their boundaries were not deliberately discriminatory. Or had not been proved so.

"The court said that the school district as a concept is basically untouchable," says Ben Justice, an education historian at Rutgers University's Graduate School of Education.

Justice calls the *Milliken* decision "ridiculous" because, he says, "to argue that where people live, particularly by the 1960s, was not the result of racist government policy was simply a lie. Public policy and private industry conspired to create neighborhoods where people could or could not live." And, Justice says, school district lines were (and remain) an extension of that discrimination.

Fast-forward more than 40 years after that ruling. One of the school borders at the heart of that case tops EdBuild's new list: the jagged curve that today separates Detroit's schools, where half of all students live in poverty, from those of Grosse Pointe, where poverty is blissfully uncommon.

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Americans Like Their Schools Just Fine — But Not Yours



Illinois State Board of Education

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July 28, 2016
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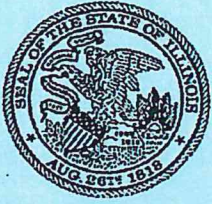
Illinois Statewide Listening Tour – Round Two

The Illinois State Board of Education, with assistance from the Regional Offices of Education, is hosting a second round of listening tours to collect feedback on ESSA.

A series of meetings will be held across the state to provide overview information on ESSA and allow participants to share their thoughts and ideas on Illinois' draft plan. The draft plan may be accessed at isbe.net/essa. Comments may be sent to essa@isbe.net.

All meetings will take place from 4:30-6:30pm with the exception of the U 46 event which will start at 5:00pm. Meetings will also include a one hour meeting for area legislators prior to each event.

Date	District	Location
Tuesday, September 6	Freeport School District 145	Freeport High School 701 W. Moseley St., Freeport
Wednesday, September 7	Moline-Coal Valley School District #40	Moline Senior High School 3600 Avenue of the Cities, Moline
Thursday, September 8	Hall High School District 502	Hall High School 800 W. Erie St., Spring Valley
Tuesday, September 13	Bloomington School District 87	Bloomington Junior High School 901 N. Colton Ave., Bloomington
Thursday, September 15	Mundelein High School District 120	Mundelein High School 1350 W. Hawley St., Mundelein
Monday, September 19	Carbondale Community High School District 165	Carbondale Community High School 330 S. Giant City Road, Carbondale
Tuesday, September 20	Effingham CUSD 40	Effingham High School 1301 W. Grove Ave., Effingham
Wednesday, September 21	Quincy Public School District 172	Baldwin Intermediate School 3000 Maine St., Quincy
Thursday, September 22	Peoria School District 150	Woodruff Career and Technical Center 1800 NE Perry, Peoria
Monday, September 26	Lockport THSD 205	Lockport East High School 1333 E. 7 th St., Lockport
Tuesday, September 27	East St. Louis SD 189	East St. Louis High School 4901 State St., East St. Louis
	Chicago Public School District 299	Simeon Career Academy 8147 S. Vincennes Ave., Chicago
Wednesday, September 28	School District U 46	Streamwood High School 701 W. Schaumburg Rd., Streamwood
Wednesday, October 5	DeKalb County Farm Bureau	Farm Bureau Theatre 1350 W. Prairie Dr., Sycamore



Illinois State Board of Education

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Tony Smith, Ph.D.
State Superintendent of Education

August 1, 2016

Meredith Miller
U.S. Department of Education
400 Maryland Avenue, SW, Room 3C106
Washington, DC 20202-2800

Docket ID: ED-2016-OESE-0032

Dear Ms. Miller:

I am writing to provide comments on behalf of the Illinois State Board of Education (ISBE) on the U.S. Department of Education's proposed regulations governing accountability, data reporting, and state plans under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA). Illinois is a state with great diversity; ISBE oversees 852 school districts, more than 4,000 schools, and over 2 million students.

We commend the overall approach of the U.S. Education Department (ED) in encouraging states to utilize the flexibility provided by ESSA in the development of their accountability systems. Illinois is pleased that the proposal is not overly prescriptive in describing the long-term goals, interim performance measures, annual academic indicators that states must establish, the weighting given to the annual indicators, and the procedures for identifying schools in need of support and improvement. Illinois supports a system of capacity building and believes that everyone benefits from high-quality coaching and support.

However, there are specific provisions, listed below, that pose significant concern and require reconsideration as the regulations are finalized.

A. §200.15 Participation in Assessments and Annual Measurement of Achievement

Proposed §200.15 would require that states annually measure the achievement of at least 95 percent of all students and 95 percent of all students in each subgroup of students enrolled in public school separately for English language arts and math. States would be required to take one of the following actions for a school that misses the 95 percent participation requirement for all students or one or more student subgroups: (1) assign a lower summative rating to the school, described in proposed §200.18; (2) assign the lowest performance level on the state's Academic Achievement Indicator, described in proposed §200.14 and §200.18; (3) identify the school for targeted support and improvement under proposed §200.19(b)(1); or (4) apply another equally rigorous state-determined action, as described in its state plan, that will result in a similar outcome for the school in the system of annual meaningful differentiation under proposed §200.18 and will lead to improvements in the school's assessment participation rate so that it meets the 95 percent participation requirement. Proposed §200.15(c)(1) would further require schools that miss the 95 percent participation rate for all students or for one or more

subgroups of students to develop and implement improvement plans that address the reason or reasons for low participation in the schools and include interventions to improve participation rates in subsequent years, except that schools identified for targeted support and improvement due to low participation rates would not be required to develop a separate plan than the one required under proposed §200.22.

ED should not be dictating a methodology or sanctions for schools that do not meet the 95 percent participation target. If Congress wanted this level of intervention for schools based on participation, Congress would have included this as part of the determining factors in comprehensive and targeted schools. ED is discounting the work that is being done by states currently to address participation issues, is not considering that there may be extenuating circumstances whereby the 95 percent threshold is not met, and is approaching a complicated issue with rigidity in contrast to the flexibility offered by ESSA.

Recommendation: ISBE believes the intent of Congress is for states to determine how best to develop an accountability system and hold schools accountable when they do not meet those targets. ESSA provides that *“Each State plan shall describe a statewide accountability system that complies with the requirements of this subsection and subsection”* 1111(c). ED should adhere to congressional intent and strike this proposed regulation and allow states to continue to address schools that do not meet the 95 percent targets.

For Illinois to achieve long-term economic and social success, we need all of our students to demonstrate readiness for the world beyond school. Illinois is best positioned to ensure all of its districts are doing everything possible to make sure all students are ready. We believe congressional intent supports this position.

B. §200.18(b)(2) and (4) – Annual Meaningful Differentiation of School Performance

The proposed regulations would require each state’s system of annual meaningful differentiation to (1) include at least three distinct levels of performance for schools on each indicator that are clear and understandable to the public and (2) result in a single rating from among at least three distinct rating categories for each school, based on a school’s level of performance on each indicator.

ISBE is concerned, due to the diversity of Illinois and funding inequities between districts, that a summative score ranking and performance levels for individual indicators that could be used to compare one school to another are not an accurate representation of school quality. Insofar as each school is unique, a full picture of a school cannot and should not be represented by a single grade despite a more robust accountability system under ESSA

Recommendation: ISBE believes the intent of Congress was for states to determine how best to meaningfully differentiate schools. ESSA provides that states *“...establish a system of meaningfully differentiating, on an annual basis, all public schools in the State”* §1111(c)(4)(C). ED should adhere to congressional intent and strike this proposed regulation and allow states to develop approaches to differentiate schools.

C. §200.19 – Identification of Schools

The proposed regulations would identify (1) schools that need comprehensive support at least once every three years, beginning with the 2017-18 school year, and (2) schools with consistently underperforming subgroups of students that need targeted support and improvement annually, beginning with the 2018-19 school year. An issue for ISBE is the proposed language that “[s]chools identified for the 2017-18 school year would be identified, at a minimum, on the basis of their performance in the 2016-17 school year.”

ISBE opposes identifying schools based on an accountability system yet to be implemented. ISBE, as do other states, needs time to collaboratively develop our accountability system under ESSA. The metrics being used within the accountability system will not be finalized until a state plan is submitted in March of 2017. Schools and districts will need time to adjust for the accountability system once it is developed. Thus, to identify schools in a system different than the system under which they will be held accountable is problematic.

Recommendation: ISBE requests that ED allow states to develop an accountability system collaboratively over the next year and then use data collected from the 2017-18 school year to identify comprehensive and targeted schools.

D. §200.19 – Identification of Schools – Graduation Rate

Proposed §200.19 would specify that any high school with a four-year adjusted cohort graduation rate below 67 percent, averaged over no more than three years, must be identified as a comprehensive school due to a low graduation rate.

While the law does not specify a particular methodology to be used in making the graduation rate calculation, the proposed regulations submitted by ED require that all states use the four-year adjusted cohort rate. ED should recognize the need for flexibility in this area when, under the 2008 Title I regulations, it allowed states to use both the four-year adjusted cohort rate and an extended-year adjusted cohort rate in their accountability systems. Congress implicitly endorsed that decision in ESSA by permitting states to use both rates in their long-term goals, measures of interim measures of progress, and annual indicators. ED bases its decision on the current proposal on an argument that this policy would provide consistency across states and that “on-time” graduation is the appropriate measure for all schools and all students. If this proposed rule becomes a requirement, there will be data inconsistency based on what is reported and what is being used to identify schools based on this policy.

More importantly, this policy will overly identify schools that disproportionately are serving students who need more time to achieve their educational goals, thus identifying schools based on the students they serve and not because of their educational program. Schools serving students that may require additional time to finish school should not be set up to be identified for comprehensive support under this policy. This type of thinking ignores the diversity of the nation’s schools and students and is precisely why the Congress decided to return key decision-making authority to the states under ESSA.

Recommendation: ISBE strongly recommends that states be allowed to use **BOTH** the four-year adjusted cohort rate and an extended-year adjusted cohort rate in their identification of schools for comprehensive support and improvement. A graduation rate threshold of 67% is too low for communities, state and country. We need to ensure we are identifying the right schools for the right reasons. Allowing for both 4-year and 5-year graduation rate ensure we do not misidentify schools that are truly helping those students who may need more time to graduate.

E. §200.19 – Identification of Schools, §200.21 – Comprehensive Support and Improvement, and §200.22 – Targeted Support and Improvement - Timelines

The proposed regulations establish a number of different identification, implementation, and exit-criteria satisfaction timelines. In proposed §200.19, an identification timeline for comprehensive schools that are the lowest-performing 5 percent of Title I schools and high schools with low graduation rates is established beginning in 2017-18 and at least once every three years thereafter.

It also aligns identification of schools requiring additional targeted support to the comprehensive identification timeline. Proposed §200.19 establishes an annual identification timeline for schools with consistently underperforming subgroups.

Proposed §200.21 establishes a timeline for satisfaction of state-determined exit criteria within a state-determined number of years (not to exceed four years). The regulations in proposed §200.22 permit the LEA to establish exit criteria and determine a timeline for satisfaction, but do not place any limitations on the maximum number of years. The proposal further requires the state to establish exit criteria for schools requiring additional targeted support that must be satisfied after a state-determined number of years (not to exceed three years), after which the school must be identified as the third type of comprehensive school, one with a consistently underperforming subgroup that has failed to improve with targeted support. Identification of this third type of school is recommended to begin in 2018-19 in proposed §200.19, giving schools only one year to implement targeted supports and services, a year that could be a planning year.

ED has established timelines for identification of schools, implementation of comprehensive or targeted supports and improvement, and satisfaction of exit criteria that are inconsistent across types of schools and within types of support and misaligned to each other.

Recommendation: We recommend that ED remove these timelines and allow states to establish their own timelines for identification, implementation, and satisfaction of exit criteria that meet a standardized maximum of no more than four years, consistent with Section 1003(c). This would allow states to award subgrants for up to four years, which may include one planning year. We recommend this same maximum of no more than four years be applied to the LEA-determined timeline for schools implementing targeted supports and services.

F. §200.24 – Resources to Support Continued Improvement

Under the proposed regulations, each award supporting continuous improvement would be at least \$50,000 per school identified for targeted support and improvement and at least \$500,000 for each school identified for comprehensive support and improvement. The exception to this is that a state could conclude, based on a demonstration from the Local Education Agency (LEA) in its application, that a smaller award would be sufficient to successfully implement the plan in a particular school.

ISBE appreciates the exception contained within the proposed regulations allowing states to make smaller awards. ISBE does not think, however, that ED is acting within the intent of ESSA in making these regulations. ESSA is deliberate in providing states latitude to make the determinations on the schools served, on plans and interventions for targeted support, and on comprehensive support schools. Under Section 1003(a), states are required to prioritize funds for districts that serve high numbers or a high percentage of schools identified for comprehensive support and improvement; districts with the greatest need for such funds, as defined by the state; and districts with the strongest commitment to improving student achievement and outcomes. Further, the amount of the award should be determined based on the evidence-based interventions and requirements outlined under section 1111(d).

Recommendation: ESSA gives states the authority to make awards “*of sufficient size to enable a local educational agency to effectively implement selected strategies*” §1003(b)(B)(2)(A)(ii). ED should adhere to congressional intent and strike this proposed regulation and allow states the flexibility to make these determinations. ED should not be dictating award amounts.

G. §200.35 - Per-pupil Expenditures

Proposed §200.35 would implement the statutory provisions requiring a state and its LEAs to annually report per-pupil expenditures of federal, state, and local funds on state and LEA report cards, disaggregated by source of funds. In addition, by requiring states and LEAs to report expenditure data for the preceding fiscal year no later than December 31, consistent with proposed §200.30(e) and §200.31(e), stakeholder awareness of LEA budget decisions from the preceding fiscal year would increase, allowing for more informed budgetary decisions in the subsequent fiscal year.

ISBE is in the process of initiating a project to collect and report on school-level budgeting. Drafting policies for data reporting, setting up systems for data collection, monitoring the collection of this data, and training of district personnel will, in all likelihood, not be possible in the 2017-18 school year, or, noting the allowance that the proposed regulations have provided, even in the next two succeeding fiscal years. Instead, this will be a multiyear process in which school-level budgeting will need to be developed in conjunction with substantive state and LEA plans and interventions.

Recommendation: ISBE is deeply committed to using all data to support improved student outcomes and has spent a number of years working on sophisticated data systems focused on

student achievement. We are just now scaling up our financial systems to report the level of data required by statute and the proposed regulations. ISBE requests ED allow for as much time and flexibility as possible while the state develops a system, trains personnel in the field, collects the data, and reports on school-site per-pupil expenditure data of federal, state, and local dollars.

H. §299.14 – 299.19 – Requirements for the Consolidated State Plan

In its proposed regulations, ED has recommended adding a number of burdensome requirements that are not found in the statute. One of the five sections in the proposed consolidated state plan requires strategies, rationale for the selected strategies, timelines, and explanations for how funds under the programs will be used for nine subparts, not to mention data on resource equity collection, performance management, technical assistance, and program-specific requirements.

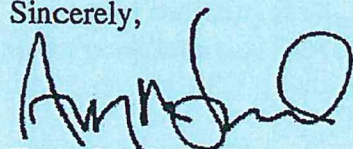
The statute clearly specifies that, in establishing requirements for the consolidated state plan, the Secretary may “*require only descriptions, information, assurances..., and other information that are absolutely necessary for the consideration of the consolidated application*” §8302(b)(3). This language has been in the statute since the consolidated plan authority was created as part of the 1994 ESEA reauthorization. Since then, ED has taken this language very seriously by winnowing down the planning requirements under the individual programs and identifying essential requirements consistent with congressional intent. The core of this intent is that the consolidated plan be a mechanism for streamlining administration and reducing burden.

Recommendation: ISBE strongly recommends ED allow states to submit streamlined plans that capture essential elements of a consolidated plan without adding planning requirements that go beyond what is called for in the statute.

Thank you for the opportunity to provide recommendations on the proposed regulations. Again, we find many positive features in the proposal, along with a number of provisions that require significant change, if not complete removal.

Illinois is committed to supporting every district to create more social economic and political capital for every student we serve. The long-term well-being of our state requires a deep commitment to excellent and equitable outcomes for all of our students. If you would like to discuss our concerns, please do not hesitate to contact our federal liaison, Melina Wright, at mewright@isbe.net or (312) 814-1295

Sincerely,



Tony Smith, Ph.D.
State Superintendent of Education

**Personnel Counts
2016-2017**

UNIT	ADM	TEACH	PT TEACH	Henry/Stark SPEC ED	SEC	PT SEC	CUST/MAINT	PT CUST	FT CAFÉ	PT CAFÉ	PARAPROFESSIONAL PT	PARAPROFESSIONAL FT	CLERICAL/TECH/SUPE PT	CLERICAL/TECH/SUPE FT	RVISORY/LIBRARY PT	RVISORY/LIBRARY FT	CERICAL/TECH/SUPE PT	CERICAL/TECH/SUPE FT	CLERK	CLERK	PT PLAY-GROUND	NURSE	PT NURSE	FT SAFE	PT SAFE	PT BUS MONITORS	TOTAL	DIST 228 EMPLOYEES
	2	1		1	6	1	5	1	2																	1	20	19
HS	4	53	1	10	6	1	8	8	2	13	2	1	1	1													103	93
MS	2	40		9	2		2	2	7	5	2																75	66
MIL	1	23		4	1		2	1	6	4																	43	39
NOR	1	19	1	9	1		2		4	6																	48	39
SOU	1	21		5	1		2		3	5																	47	42
St. Malachy's									2																		2	2
TOTALS	11	157	2	38	17	2	21	3	6	35	22	1	3	3	3	2	1	4	1	8	1	4	1	8	1	338	300	

Full time employees 218
Part-time employees 82
Henry/Stark employees 38
Part-time Henry Stark 0
TOTAL DISTRICT 338

CERTIFIED FULL TIME 168
CERTIFIED PART-TIME 2
SUPPORT STAFF FULL TIME 50
SUPPORT STAFF PART-TIME 80
GENESEO EMPLOYEES 300

*Henry-Stark Counties Special Education District	
*Cassie Hanson-District Special Education Coordinator	
*Janet Larson - HS (Life Skills)	*Laura Winkleman - Mil (Speech Pathologist)
*Isabelle Mathews - HS (Life Skills)	*Kelly Lawrence - Mil (Cross Cat)
*Dawn Sheddian - HS (Cross Cat)	*Andrea Allen - Mil (FT Aide)
*Chandra Williams - HS (Sign Language Interpreter)	*Hannah Whiteside - Mil (FT Aide)
*Jeff Belvel - HS (Psychologist)	*Taylor Anderson - NS (Speech Pathologist)
*Lisa Witte HS (Hearing itinerant)	*Anna Beth Anderson - NS (Life Skills)
*Lora Johnson - HS (FT Aide)	*Eleanora Hendrix - NS (Life Skills)
*Jennifer Hoon - HS (FT Aide)	*Meghan Mahoney - NS (Psychologist)
*Lisa Verstraete - HS (FT Aide)	*Pam Martens - NS (ECE)
*Andrea Gonzales - HS (FT Aide)	*Mariah Bell - NS (FT Aide)
*Margaret Judson - MS (Speech Pathologist)	*Tricia Girtlen -NS (FT ECE Aide)
*Andrea Hogue - MS (Life Skills)	*Amber Johnson - NS (FT Aide)
*Jeanne Napier - MS (Psychologist)	*Stephanie Stephenson NS (FT Aide)
*Kaitlyn Nordstrom - MS (Psychologist)	
*Allison Goodwin - MS (FT Aide)	
*Tina Mattan - MS (FT Aide)	
*Darcie VanDoren - MS (FT Ind Aide)	
*Elizabeth Hull - MS (Social Worker)	
*Karen Kistler - MS (Social Worker)	
	*Alesha Rlewarts - SW (Speech Pathologist)
	*Bridgette Fitzpatrick - SW (Cross Cat)
	*Aly Kupersmith - SW (ECE)
	*Heidi Stanfield - SW (FT Aide)
	*Lori Tracey - SW (FT Aide)

**Personnel Counts
2015-2016**

UNIT	ADM	TEACH	PT TEACH	Henry/Stark SPEC ED	SEC	PT SEC	CUSTOMANT	PT CUST	FT CAFE	PT CAFE	PARAPROFESSIONAL	PT	PARAPROFESSIONAL	FT	PARAPROFESSIONAL	PT CLERICAL	SUPERVISORY OR	LIBRARY CLERK	PT CLERICAL	SUPERVISORY OR	LIBRARY CLERK	PT PLAY-GROUND	NURSE	PT NURSE	FT SAFE	PT SAFE	PT BUS MONITORS	TOTAL	DIST 228 EMPLOYEES
HS	2	3	3	1	4	1	5	1	2	2	2	3	2	3	1	1	1	1	1	1	1	1	1	1	1	1	1	20	19
MS	4	53	3	11	5	2	8	0	13	13	2	3	2	3	1	1	1	1	1	1	1	1	1	1	1	1	109	98	
MIL	2	39	2	6	2	2	2	2	6	6	5	5	5	5	2	2	2	2	2	2	2	2	2	2	2	2	70	64	
NOR	1	23	1	2	1	1	2	1	6	6	4	4	4	4	2	2	2	2	2	2	2	2	2	2	2	2	41	39	
SOU	1	19	1	10	1	2	2	1	4	4	6	6	6	6	2	2	2	2	2	2	2	2	2	2	2	2	47	37	
St. Malachy's	1	22	1	6	1	2	2	1	4	4	5	5	5	5	1	1	1	1	1	1	1	1	1	1	1	1	50	44	
TOTALS	11	159	3	36	14	3	21	3	6	35	22	3	2	1	4	1	4	3	2	1	4	1	1	7	1	1	339	303	

Full-time employees 219
 Part-time employees 84
 Henry/Stark employees 36
 PT Henry Stark 0
 TOTAL DISTRICT 339 *(including Henry/Stark)
 CERTIFIED FULL-TIME 170
 CERTIFIED PART-TIME 3
 SUPPORT STAFF FULL-TIME 49
 SUPPORT STAFF PART-TIME 81
 GENESEO EMPLOYEES 303

Henry/Stark Counties Special Education District
*Cassie Hanson-District Special Education Coordinator
*Janet Larson - HS (Life Skills Teacher)
*Isabelle Strong - HS (Life Skills)
*Dawn Sheddan - HS (Cross Cat)
*Chandra Williams - HS (Sign Language Interpreter)
*Jeff Bevel - HS (Psychologist)
*Lisa White HS (Hearing Inlinerant)
*Lora Johnson - HS (FT Aide)
*Jennifer Hoon - HS (FT Aide)
*Lisa VerStrate - HS (FT Aide)
*Amber Johnson - HS (FT Aide)
*Tara Hollinshead (Vision Inlinerant)
*Margaret Judson - MS (Speech Pathologist)
*Andrea Hogue - MS (Life Skills)
*Jeanne Napier - MS (Psychologist)
*Tina Maitan - MS (FT Aide)
*Darcie VanDoren - MS (FT Ind Aide)
*Lexi Frakes - MS (Social Worker)
*Kelly Lawrence - Mill (Cross Cat)
*Andrea Allen - Mill (FT Aide)
*Alesha Riewerts - SW (Speech Pathologist)
*Brigitte Fitzpatrick - SW (Cross Cat)
*Ally KuperSmith - SW (ECE)
*Lori Tracey - SW (FT Aide)
*Cindy Newton - SW (FT Aide)
*Jacque Freebarn - SW (FT Aide)
*Anna Beth Anderson - NS (Life Skills)
*Theresa Fredericks - NS (Speech Pathologist)
*Gina Stearns - NS (Life Skills)
*Pam Martens - NS (ECE)
*Michelle Aman - NS (FT Aide)
*Mariah Beil - NS (FT Aide)
*Connie Cybulski - NS (FT ECE Aide)
*Stephanie Stephenson NS (FT Aide)
*Laura Winkleman - NS (Speech Pathologist)
*Megan Mahoney - NS (Psychologist)

**Personnel Counts
2011-2012**

UNIT	ADM	TEACH	PT TEACH	FT Communication Coordinator	Henry/Stark SPEC ED	Henry/Stark PT SPEC ED	SEC	PT SEC	CUSTOM/MAINT	PT CUST	FT CAFE	PT CAFE	TEACH AIDE	PT TEACH/PERSONAL AIDE	PT CLERICAL/SUPERVISORY OR LIBRARY CLERK	TECHNICAL ASST.	FT CLERICAL/SUPERVISORY OR LIBRARY CLERK	TECHNICAL ASST.	FT TECHNOLOGIST	PT TECHNOLOGIST	PT PLAY-GROUND	NURSE	PT NURSE	SAFE	PT SAFE	PT BUS MONITORS	PT PARENT EDUCATOR	TOTAL	DIST 228 EMPLOYEES
HS	4	57	3	1	10	5	5	2	5	4	3	12	1	1	2	2	1	1	1	1					2		21	21	
MS	2	42	2		5	2	2	2	2	2	8	3	3		5	2						1					111	101	
MIL	1	23	2		3	1	1	1	2	1	7	6	1		1	1						1					72	67	
SOU	1	23	2		3	2	2	2	2	2	4	4	2		2	4						1		1	1	4	47	45	
NOR	1	16	0		6	1	1	1	2	2	3	2	3		1	1					1			2	1	40	34		
St. Malachy's																											2	2	
ALC	1	2				1				1																	5	5	
TOTALS	12	165	5	1	27	0	16	3	18	8	6	36	2	17	11	2	1	0	1	1	4	1	6	1	2	1	346	319	

Full time employees 225
 Part-time employees 92
 Henry/Stark employees 27
 PT Henry Stark 0
TOTAL DISTRICT 344 *(including Henry/Stark)

CERTIFIED FULL TIME 177
 CERTIFIED PART-TIME 5
 SUPPORT STAFF FULL TIME 48
 SUPPORT STAFF PART-TIME 89
GENESEEO EMPLOYEES 319

Dan Rakestraw NS (MIL)
 Alesha Arndt MIL (NS)
 Tony Hernandez HS (MS)
 Heidi Hernandez SW (NS)
 Lindraw Johnson - SW (NS)
 Denise Ford MIL (NS)
 Jill Wouif MS (SW)
 Nicole Smith - MIL (North)
 Jeanne Brucher - HS (MS)

James Roodhouse - Unit
 Rayanne Burrack - Unit
 Bill Esker - Unit
 Jackie Bopp - SW

Cindy Phlypo NS SAFE (HS Cafe)

*Henry Stark -
 *Megan Ernst - MIL
 *Laura Winkleman - MIL (Speech Pathologist)
 *Lisa VerStraete - MIL (FT Aide)

Jackie Call - HS
 Nick McCauley - HS
 *Nacole Jackson - HS (FT Interpreter)
 *Adrienne Kruse - HS (FT Interpreter)
 *Jeff Beivel- HS (Psychologist)
 *Lisa Witte HS (Hearing Impaired Teacher)
 *Lora Johnson - HS (FT Aide)
 *Jennifer Hoon - HS (FT Aide)
 *Tina Mattan HS (FT Aide)
 *Tara Hollinshead - HS (Visual Impaired)

*Sharon Neumann - MS
 *Andrea Hogue - MS
 *Jeanne Napier - MS (Psychologist)
 *Kathy Cross - MS (FT Aide)
 *Darole VanDooren - MS (FT Ind Aide)

*Alesha Stralow - SW (Speech Clinician)
 *Brigitte Fitzpatrick - Southwest
 Jackie Freebern - SW (FT Aide)

*Theresa Fredericks - NS (Speech Clinician)
 *Pam Martens - North ECE
 *Amber Johnson - North ECE (FT Aide)
 *Mary Kelly -North
 *Mary Beth Farber-North (FT Aide)
 *Sandra Manna - MIL (FT Aide)

The first school listed behind teachers that split their time between buildings, is the school that receives their personnel count.

2006-2007

PERSONNEL COUNTS

UNIT	ADM	TEACH	PT TEACH	ED	Henry/Stark SPEC	ED	Henry/Stark PT	SPEC ED	SEC	PT SEC	CUST/MAINT	PT CUST	CAFE	PT CAFE	TEACH AIDE	PT	TEACH/PERSONAL AIDE	PT CLERICAL/SUPERVISORY OR LIBRARY CLERK, TECHNICAL ASST.	FT TECHNICAL ASSISTANT/LIBRARY CLERK	PT PLAY-GROUND	NURSE	PT NURSE	SAFE	PT SAFE	PT STUDY HALL	SCHOOL SECURITY OFFICER	TOTAL	DIST 228 EMPLOYEES
HS	4	57	1	2	4	1	4	1	5	1	1	1	1	1	0	5	4	1	1	1	1	1	1	1	1	1	17	15
MS	2	40	1	2	4	3	4	4	4	2	2	2	2	2	0	5	4	1	1	1	1	1	1	1	1	1	103	103
MIL	1	22	1	6	1	1	2	2	2	1	2	1	6	2	8	0	4	6	2	2	2	0	1	1	1	1	70	68
SOU	1	21	0	2	1	1	2	2	2	0	2	0	4	0	3	1	1	2	0	1	2	0	1	1	5	5	48	48
NOR	1	14	0	2	1	1	2	2	2	0	2	0	4	0	4	0	4	1	1	2	2	0	1	3	3	3	34	43
ATK	5	5	3	2	1	1	2	2	2	0	2	2	0	3	0	2	2	2	2	2	2	0	1	2	2	2	34	32
ALC	1	4					1																				19	19
TOTALS	13	163	5	12	0	14	5	17	8	4	41	2	26	10	2	6	1	5	1	10	1	5	1	10	0	1	346	6

Full time employees 217
 Part-time employees 117
 Henry/Stark employees 12
 PT Henry Stark 0
TOTAL DISTRICT 346 *(including Henry/Stark)

CERTIFIED FULL TIME 176
 CERTIFIED PART-TIME 5
 SUPPORT STAFF FULL TIME 41
 SUPPORT STAFF PART-TIME 112
GENESECO EMPLOYEES 334

- Kevin Reed - HS (MS)
- Julie Marriot - HS (MS)
- Tony Hernandez HS (MS)
- Heidi Hernandez SW (ATK & MIL)
- Lindrew Johnson - SW (HS, MS)
- Denise Ford MIL (ATK & NS)
- Vickie Hawley ATK (MIL & MS)
- Carrie Schindwein ATK (SW)
- Jill Wouif MS (SW)
- Jackie Bopp - Unit
- Clark Brookens - Unit
- Shelly Ganson - MS (HS)
- Judi Nash SW (ATK & MIL)
- Heidi Harner - MIL (North)
- Robert Thomas MIL (North)
- Nancy Green MIL (North)
- Glenda Thoms NS (MS)
- Michelle Ganson MS (HS)
- Brenda Chrisop NS (HS)
- *Henry Stark -
- *Kathy Cross -PT Aide MS
- *Pam Martens - MIL ECE
- *Brigitte Fitzpatrick - MIL
- *Mary Kelly - MIL
- *Chris Ahlstrand - MIL (SW)
- *Kim Shubat NS (MS)
- *Theresa Fredericks - NS (ATK)
- *Andrea Hogue - MS
- *Megan Olson - MIL
- *Mary Beth Farber - MIL FT

The first school listed behind teachers that split their time between buildings, is the school that receives their personnel count.

2002-2003

PERSONNEL COUNTS

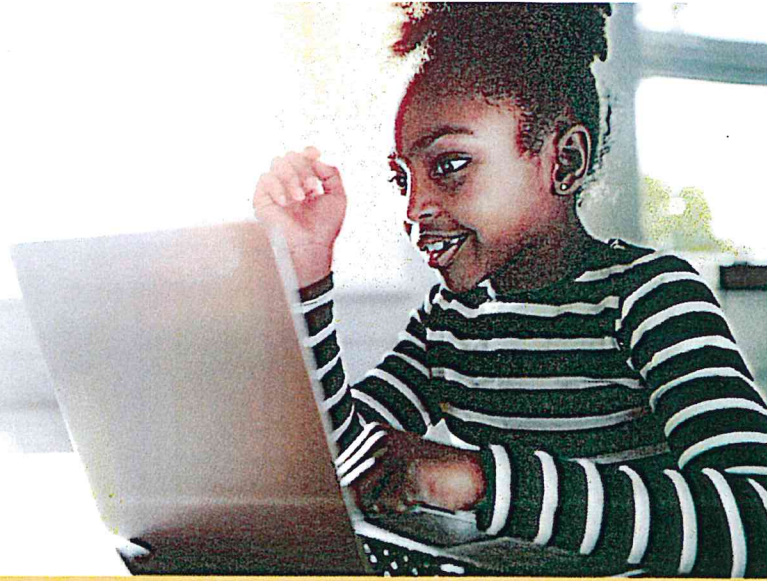
UNIT	TOTAL	ADM	TEACH	PT TEACH	SPEC ED	PT SPEC ED	SEC	PT SEC	CUST	PT CUST	CAFE	PT CAFE	TEACH AIDE	PT PLAY-GROUND	NURSE	SAFE	PT SAFE	PT STUDY HALL	POLICE LIASON
HS	22	3	1	1	5	1	4	2	5	1	1	1	0(3)		1			1	1
MS	108	4	65	3	1	6	2	6	6	2	2	15	0(2)		0(1)				
MIL	72	2	43	3	1	2	6	1	3	1	0	8	0(5)	3	0(1)				
SOU	45	1	22	1	1	1	1	1	2		1	7	0(4)	2	0(1)	1	4		
NOR	49	1	23		3	1	1	1	2		0	4	0(4)	2	0(1)				
ATK	43	1	19	1	5	1	1	2	2		0	4	1(5)	1	0(1)		3		
ALC	19	1	7		1	1	1	1	1	1	0	2	0(2)	1	0(1)		2		
	6	1	4				0												
TOTALS	364	14	184	5	15	1	16	10	21	5	4	41	1(21)	6	1(5)	1	9	1	1

Full time employees 257
 Part-time employees 107

Total 364

CERTIFIED FULL TIME 212
 CERTIFIED PART-TIME 8
 SUPPORT STAFF FULL TIME 45
 SUPPORT STAFF PART-TIME 99
364

() Denotes part-time

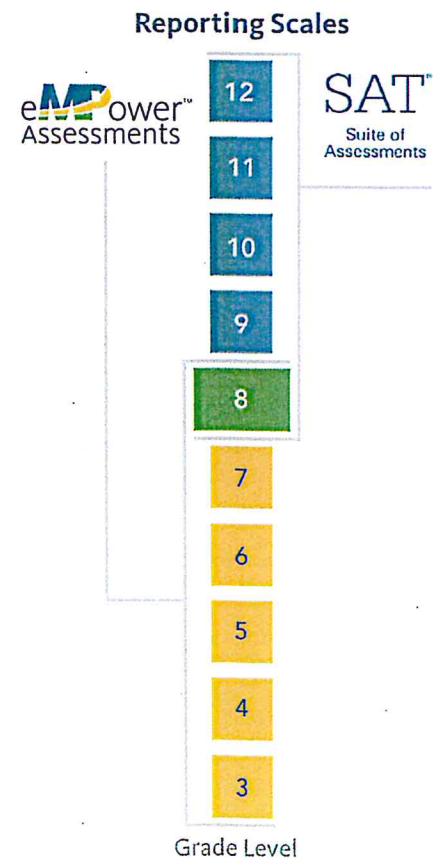


Interim assessments for districts

eMPower™ Assessments are reliable and valid interim assessments for grades 3–8 in reading, writing, language, and mathematics that provide a predictive connection to the SAT® Suite of Assessments. Built to national standards and aligned to state standards, eMPower Assessments show student growth over time to determine if students are making progress toward meeting college and career readiness goals.

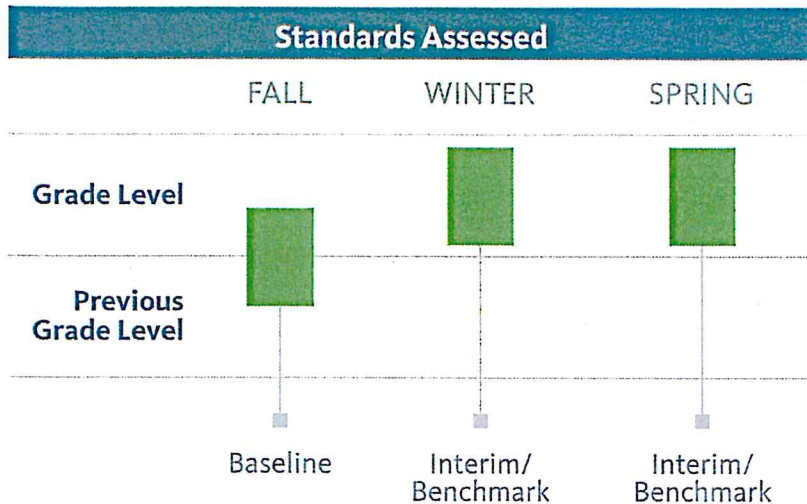
Interim assessment that supports district needs

- **Linked to the SAT Suite of Assessments.** Reporting 8th grade results on the score scale of the SAT Suite of Assessments, eMPower Assessments provide a predictive connection to the PSAT 8/9, PSAT 10, and SAT. Together with the SAT, the eMPower Assessment suite represents a comprehensive assessment solution to gauge college and career readiness for grades 3–high school.
- **Provides a consistent solution for classroom, district, and statewide testing.** Districts can use eMPower Assessments for secure district-wide interim testing that is consistent with the SAT and statewide accountability tests in terms of rigor, item types, and presentation style. In addition, a formative classroom complement supports individual student instruction, targeted to interim results.
- **Maintains respect for instructional time.** eMPower Assessments can provide meaningful data using limited testing time. The program follows U.S. Department of Education recommendations that student assessments should be worth taking, of high quality, and time-limited.
- **Delivers valid and reliable score reporting.** eMPower Assessments provide reliable scores at every reporting level, built to national college and career readiness standards and aligned to state-specific standards.



Show student growth

eMPower Assessments help you measure student growth up to three times a year. They provide consistency for your assessment program, reporting how students are tracking toward college and career readiness standards and goals.



Create checkpoints throughout the school year and year-to-year. Fall, winter, and spring tests give actionable data and provide a reliable measure of growth within and across years.

Support for classroom instruction

Providing formative instructional resources for teachers, the eMPower classroom complement ties to eMPower score reporting categories. Teachers can use these formative tools to direct individual instruction and support additional student learning towards mastery of the specific standards assessed with eMPower Assessments.

eMPower Assessments form the foundation of a complete suite that provides a consistent and coherent approach to meet your assessment needs. In the classroom and across the district, eMPower Assessments provide the same item types and level of rigor as statewide accountability programs.



eMPower Assessments at a glance

Type of assessment: interim

- Format: fixed-form
- Grades: 3–8
- Subjects: reading, language, writing, and mathematics
- Standards covered: college and career readiness, state-specific standards alignment available
- Administrations per year: up to 3
- Length of test: 2 sessions per administration, per subject, per grade level
- Timing per session: between 23 and 39 minutes, depending on grade level and subject area
- Types of items: selected-response, including multiple-choice, multiple-select, and evidence-based selected-response
- Delivery modes: online or paper/pencil
- Scoring: auto-scored
- Reporting time: immediate
- Optional features: constructed-response items with professional hand-scoring available for an additional fee



To learn more about eMPower Assessments, visit go.measuredprogress.org/empower-for-districts, or email info@measuredprogress.org.



