



Release date: August 15, 2017

Advanced Opportunities

Comment(s):

Thank you for the opportunity to submit public comments on Idaho's Consolidated Plan. In reviewing the plan, we are concerned that there are several references to Dual Credit and only one reference to Advanced Placement, which can be found under the Access to Services Section of the McKinney-Vento Act. While this may be a semantics issue or simply an oversight, we believe that it would be more appropriate if the Consolidated Plan referenced Advanced Opportunities rather than just Dual Credit. To correct this, the authors of the Consolidated Plan could simply replace Dual Credit throughout the document with Advanced Opportunities, thereby broadening the meaning and intent of the document to include, "overload courses, dual credits, college credit-bearing examinations and professional certificate examinations," as is outlined in 33-4602, Idaho Code. This will also align Idaho's Consolidated Plan with the language and intent of Title IV, Part A, Section 4104 State Use of Funds, which allows states to spend their State Activities Funds on, "supporting local educational agencies in providing programs and activities that offer well-rounded educational experiences to all students, as described in section 4107, including female students, minority students, English learners, children with disabilities, and low-income students who are often underrepresented in critical and enriching subjects, which may include increasing student access to and improving student engagement and achievement in high-quality courses in science, technology, engineering, and mathematics, including computer science; activities and programs in music and the arts; foreign languages; accelerated learning programs that provide postsecondary level courses accepted for credit at institutions of higher education, including dual or concurrent enrollment programs, and early college high schools; or postsecondary level instruction and examinations that are accepted for credit at institutions of higher education, including Advanced Placement and International Baccalaureate programs...."

The references in the document that need to be changed to accomplish this can be found on the following pages and paragraphs:

- Page 30, last section of the chart that outlines the Strategies used in the Idaho Statewide System of Support. Change dual credit to advanced opportunities.
- Page 40, last sentence in the second to last paragraph under section 6 School Transitions. Change dual credit to advanced opportunities in both locations within this sentence.
- Page 62, Under Section F. Title IV, Part A: Student Support and Academic Enrichment Grants. Replace dual credit with advanced opportunities in the fourth sentence. The second and third reference to dual credit in this paragraph are most likely appropriate as they are directly referencing a need to streamline the process of dual credit registration and clarifying how dual credits transfer from one institution to another.



- Page 62, in the first section of the chart outlining Strategies, Timelines and Funding Sources. Change dual credit to advanced opportunities. The second reference to dual credit found in the second cell is most likely appropriate.

Response:

Thank you! These corrections have been made in the final version.

Consistently underperforming subgroups

Comment(s):

Consistently underperforming subgroups: Schools should be identified as "consistently underperforming" when any subgroup of students fails to meet the state- defined academic goals and interim measures for two years.

Response:

In keeping with the spirit of ESSA and its focus on achievement gaps, Idaho defined consistently underperforming subgroups as those with achievement gaps between the group and their "non-group" peers (i.e., English learners vs. non-English learners) of 35 percentage points or more averaged over three years.

The progress of these groups toward interim and long-term goals will be reported annually on the school's report card.

Comprehensive support and improvement

Comment(s):

Comprehensive support and improvement: States are permitted under ESSA to broaden the categories of schools that are identified for comprehensive support and improvement. A category should be added for schools that have already been identified for targeted support and improvement for three years because of consistently underperforming subgroups.

The current accountability plan seems to involve averaging percentiles for the five indicators, which is not appropriate. If averaging is going to take place, it would be more appropriate to average normal curve equivalents.

Response:

Stakeholders encouraged Idaho to avoid unnecessary school categories. Schools identified for targeted support and improvement because of low-performing student groups for three consecutive years are moved into the comprehensive support and improvement category. Schools that do not exit comprehensive support and improvement status will qualify for more rigorous interventions. These interventions are described in the plan. The public will easily be



able to determine whether a school was identified for comprehensive or targeted support on the school report card, including whether a school qualifies for more rigorous interventions.

Though there will not be an additional "reward school" category, schools that are meeting their goals or that are in the upper tier of achievement in any of the indicators will have that recognized on their report card.

Earlier drafts of the plan incorrectly described the calculation used during the school identification process as a percentile calculation. This has been corrected. The state will use a percentile rank calculation – displaying the percent of schools falling below the school in question. A normal curve equivalent is not used.

Educator effectiveness

Comment(s):

Definition of effective teacher: Evidence of effectiveness should include: 1) preparation that includes extensive clinical experience with a demonstration of instructional skill; 2) passage of a performance assessment in order to be certified or to complete a preparation program; and/or 3) a level of state certification that reflects demonstrated instructional effectiveness.

Definition of experienced teacher: Any teacher with less than three complete years of experience should be considered "inexperienced."

Qualifications for special educators: Although ESSA only requires a bachelor's degree - in any subject - our children deserve better. Teachers who are considered "special education teachers" should have been prepared with research-based instructional strategies in special education teacher preparation programs. If they do not have these qualifications they should be considered "out of field teachers."

Students success depends on several components: 1) Parental involvement, 2) proper school atmosphere/environment for learning, 3) quality instructional materials, 4) adequate resources for the teachers, and 5) effective teaching practice for large number of students, 6) doing academic activity during the summer break. Failure in one or more of these element means burden is placed on other elements. For example, teachers can be successful when parents are involved during the school year, and continue to do reading/math during the summer break. Failure to do reading during summer means students lose their reading skills. Not giving excellent problems in classrooms, due to poor resources, students will stagnate. It will be reflected in teachers, but not on the other elements.

It is better that teachers are deemed ineffective when all other elements are deemed to be adequate.



In my personal case, the school district imposed poor curriculum in math. School official thought that it was excellent material. It took involved parents to remove the ineffective curricular materials from classroom. Uninvolved parents and the higher authorities would blame on teachers for the failure, but not on themselves. When poor instructional materials were in place for the entire year, my child would not have learned the math. Thus, poor teacher evaluation may not be due to poor teachers, but due to poor instructional materials. School decision makers are to be blamed for the poor student performance.

Response:

ESSA removes the federal highly-qualified teacher definition and tasks states with monitoring the distribution of "ineffective, inexperienced, and out-of-field teachers" in its schools. Idaho retained its definitions of inexperienced and out-of-field teachers, and aligned its ineffective teacher definition to career ladder requirements. Currently, those definitions are:

- Ineffective teacher:
 - Majority (50% +1) of his/her students have NOT met their measurable student achievement targets (pursuant to 33-1001, Idaho Code), or
 - Has a summative evaluation rating of unsatisfactory.
- Out-of-field teacher: not appropriately certificated or endorsed for the area in which he/she is teaching
- Inexperienced teacher: in his/her first year of practice

These definitions may change if there is concern that the current definitions do not provide an accurate picture of the distribution of these teachers across the state and within districts.

It is true that student success is dependent on the actions and responsibilities of many actors, including parents, classroom teachers, support staff, and administrators at the school, district and state levels. For this reason, one of the goals of the state department of education is that all education stakeholders are mutually responsible for student success.

General feedback and copy editing

Comment(s):

I would like to help, though I'm not sure how much I can contribute to the process.

Was instructed to fill this out if we would be interested in serving to help in the development of this plan.

It is hoped that students are forced to do exercises before learning in classroom.



I have just started reviewing the latest Consolidated Plan draft and found a mistake on page 12. 2. b. 1. Calculation: Long-term goal = $50\% \times (100 - \text{previous year \% proficient/advanced}) + \text{previous year \% graduating}$. This should read: $50\% \times (100 - \text{previous year \% graduating}) + \text{previous year \% graduating}$.

I am sure it is a simple copy/paste error and "proficient/advanced" just wasn't replaced with "graduating" within the parentheses.

Near the bottom of page 12 of the Consolidated Plan, under "Calculation" the "Long Term Goal" says:

$75\% \times (100 - \text{previous year \% proficient/advanced}) + \text{previous year \% graduating}$

I believe it should say:

$75\% \times (100 - \text{previous year \% graduating}) + \text{previous year \% graduating}$

Response:

Everyone can contribute! Importantly, Idaho's ESSA accountability conversation does not end when the U.S. Department of Education approves the plan. As we implement the plan, we will uncover details that need to be changed in order for our plan to be the best it can be for Idaho's students, educators, and parents. Everyone interested in being involved should stay tuned for press releases and announcements seeking additional input and partnership going forward.

Idaho rules require districts to provide physical education in a manner of their choosing.

Thank you for helping us find typos in the plan!

Goal setting

Comment(s):

A nearly 4% yearly increase goal in proficiency as measured by the rigorous new ISAT is not going to happen, at least not in this universe. That this would happen with regularity each year is even less likely, especially as proficiency rises closer to 100%. No one believes this and it is detrimental to and undercuts the credibility of the whole effort to better support student success. This could become a replay of the failed no child left behind era, which resulted in an emphasis on low cognitive level teaching and learning, with a focus on numbers, not students. 1 to 2 % is much more reasonable an expectation.

Response:

Feedback on the initial long-term goals indicated that the goals were too ambitious, and they have been adjusted. ESSA requires that a state's goal-setting methodology to meet the following criteria:



- Be uniform across all schools and student groups;
- Set long-term goals that are ambitious and attainable; and
- Close achievement gaps.

Idaho's goals in the final plan strike a balance between ambitious and attainable while complying with ESSA requirements.

Graduation rate

Comment(s):

Please seriously look at changing the graduation rate calculations. Currently students in Special Education as well as those enrolled in Alternative Schools (both which allow for students to attend school until they are 21 years of age) are considered drop-outs if they do not complete the Idaho Graduation Requirements with their 4 year cohort, yet we have systems in place (including Federal IDEA) that allows them to continue in our schools yet the schools are penalized with what I would consider inaccurate representation of graduation rates. Please consider creating options that would allow students to be a part of 5, 6, or even 7 year cohorts (if applicable) under either Special Education and/or Alternative Schools (at-risk criteria) for the purposes of graduation rate calculations.

I would propose looking into how graduation rates are calculated in regards to students who are in special education as well as alternative graduation programs, such as alternative high schools. It is my understanding that students who do not complete High school in the traditional 4 years are considered drop outs. This seems to go against the programs in place that allow students to attend until the age of 21 if on an IEP or attending an alternative program. It does not reflect the efforts of these programs or reward districts for having quality alternative programs. It seems that the goal should be to graduate as many as possible. Thanks.

I have reviewed the latest draft of the Consolidated Plan and appreciate the work that has been done. I applaud the State Department for working to avoid the two cited common challenges associated with school accountability: Growth Ceiling issue and Low Baseline issue. I also applaud you for differentiating alternative schools. As an educator, I appreciate the efforts by the SDE for fairness in the accountability system. On the subject of fairness, I would like the SDE to take another look at the graduation rate measures and consequences. The plan states that any high school with a four-year cohort graduation rate of less than 67% will be identified as a comprehensive support and improvement school. This does not differentiate for alternative schools. It should. Additionally, virtual schools, while not differentiated in the draft plan, should also be held to a different measure here. Alternative schools, by definition, enroll students who are at risk. Many are under-credited and will not graduate within the 4-year cohort. Virtual



schools have similar issues with many of their students, and, to exacerbate the issue, virtual and alternative students are often highly mobile. These students are at higher risk of leaving the school, and it can be very difficult to track them down. At risk students are also at higher risk of dropping out of school, which is going to affect graduation rate, as well. By holding alternative and virtual schools to the 67% graduation rate bar, the State Plan could be dis-incentivizing schools to enroll these at-risk students. Alternative or virtual are both, oftentimes, last chance schools, so this could result in more Idaho students never graduating. Alternative and virtual schools graduate students who would not have graduated in another setting. Some of these students graduate in 4 years. Others take 5 or 6 years. It is a positive thing for these kids to graduate even if it takes a little longer. I don't have to go into all of the statistics for non-graduates and the negatives involved. You already know. The federal graduation rate calculation has already caused schools to push students at risk for not graduating within the 4-year cohort into alternatives and virtuals. I know, because I have spoken with parents who have experienced this. Alternatives and virtuals struggle with the 4-year cohort graduation rates. Putting even higher stakes on grad rate could make this problem worse and actually decrease alternative's and virtual's already low 4-year grad rates. I understand the limitations that the federal government has put in place for the plans, but I hope the SDE will consider another metric for graduation rate for alternatives and include virtual schools, as well. If all of the alternative schools and virtual schools end up in improvement due to the grad rate measure (or shut down in the case of virtual schools, which are all under the PCSC's Performance Framework), where will our at-risk students go?

Response:

The U.S. Department of Education sets the definition of the four-year cohort graduation rate calculation. Under this definition, students are tracked with their cohort beginning in fall of ninth grade. That student has four years to graduate from high school – which includes the summer after his or her senior year – in order to be counted in the four-year cohort for the school.

Idaho can define a five-year cohort graduation rate. This work is underway and SDE will seek input from our education stakeholders to determine the best definition. ESSA requires that if the five-year cohort graduation rate is used for accountability purposes, the state must set five-year graduation rate goals that are more ambitious than its four-year graduation rate goals.

ESSA requires that *all high schools* with a graduation rate lower than 67% be identified for comprehensive support and improvement. Feedback from alternative schools indicated a strong preference to be treated like other schools in terms of the indicators used for accountability, however the Accountability Framework separates high schools and alternative high schools for school identification purposes in order to avoid over-representing alternative high schools in the identification results. Alternative high schools serve an important role and are commended for serving a high proportion of at-risk and historically disadvantaged students.



Indicators in the school rating system

Comment(s):

Indicators in the rating system: No school that would have been identified as in need of targeted or comprehensive support and improvement on the basis of ESSA's required indicators (student achievement/growth, high school graduation, and progress towards English language proficiency) should cease to be identified because of success on the other indicator(s) of school quality that the state can select. The focus must be on academic achievement.

There is no definition for "proficient" related to school accountability. Under NCLB there were two federal definitions. NAEP proficient was similar to an A performance. The NCLB definition of proficient, which Idaho had to use for ISAT, was similar to a C or above performance. The SBAC developers tried to define ISAT/SBAC proficient as similar to NAEP's definition as possible, or similar to an A performance.

You need to state a clear definition for proficient that you will use and reset your accountability goals accordingly.

Response:

The school identification system outlined in the plan was designed with two overarching goals:

- Simplicity and transparency: all education stakeholders should be able to understand why and how a school was identified for comprehensive or targeted support.
- Schools identified are *both* low performing *and* not improving.

The indicators used for identifying schools, in compliance with ESSA, place much more weight on academic performance than on the school quality indicator.

A definition for proficiency has been added to the plan and reads: "Proficient" means that a student has met or exceeded grade level standards in a specific subject as determined by performance on the associated assessment.

N-size

Comment(s):

Minimum subgroup size (N-Size): There are national studies recommending 10 or lower as a minimum subgroup size. Higher numbers undermine disability subgroup accountability. For example, a national study demonstrated that a state with an N-size of 30 would not count more than 20% of students with disabilities in most aspects of its accountability system. The state we're residing in now (Ohio) is recommending 10 for their subgroup and have research to back it up--click on the discussion topics on this link: <http://education.ohio.gov/Topics/Every-Student-Succeeds-Act-ESSA>)



RE: Small schools may be exempt from accountability under ESSA plan

<https://www.idahoednews.org/news/small-schools-may-exempt-accountability-provisions-essa-plan/>

This problem may be resolved by letting small schools (elementary, middle, or high) voluntarily "partner" with other small schools to have enough students to qualify. Give the partnership a "partner school name" for accountability purposes. Each member of the partner school would receive only accountability data for the partner school, not by individual school.

The SDE could facilitate an online discussion where all small schools are invited to learn about the partnerships, and the process to participate.

Response:

N-sizes were chosen to meet stakeholder desire that the accountability system include as many schools as possible and to ensure that as much information about student performance is available while still protecting student privacy. Idaho received considerable feedback from stakeholders regarding N-size. The final plan incorporated this feedback and uses an N-size of 20 in the "all students" group for school identification.

Many Idaho schools have a small number of students who fall into the disaggregated student groups required under ESSA (e.g., English learners, racial/ethnic groups, students with disabilities). Therefore, the N-size for these groups will be 10. N-size for graduation rate will also be 10. It is important that Idaho's accountability system capture these students so that education stakeholders can monitor achievement for these groups as well as achievement gaps between these groups and their peers.

N-size for non-accountability reporting, which is set by Idaho's Data Management Council, is 5.

Participation requirement and attendance

Comment(s):

95 percent participation rate requirement: When fewer than 95 percent of students (and each subgroup of students) are included in the state assessments, it should be reflected in a significant way in the school rating and a plan should be implemented to ensure that the school meets the participation rate requirement in the subsequent year.

The Idaho Consolidated Plan needs to address the "partial attendance" requirements found in 20 USC 1111(c)(4)(F). These requirements govern which school a student is assigned to for



accountability purposes when they have attended school at their current school for less than half a school year.

Response:

Schools that fail to meet the 95-percent assessment participation requirement set in ESSA for all students or any student group will write and implement a plan to increase participation. The school's failure to meet the requirement will be noted on the school's report card.

It might be better to say, IDAPA Rule 08.02.03.112 establishes the full academic year for student enrollment continuously from the end of the first 56 calendar days is included in accountability calculations at the school and district levels.

Significant cognitive disabilities

Comment(s):

I would like to be part of the discussion on what is a significant cognitive impairment

Definition of students with the most significant cognitive disabilities: The state IEP team guidelines should include a definition that expressly states it is not based on IQ or disability category or educational setting. The focus should be on whether the student requires extensive direct individualized instruction and substantial supports to achieve measureable gains on the challenging state content standards for the grade in which the student is enrolled.

Training on state guidelines for alternate assessment participation: Training should be provided to parents, teachers, schools and districts on how to appropriately identify those students with the most significant cognitive disabilities who will participate in the state alternate assessment. The training should also explain that participation in an alternate assessment does not determine a student's placement (IDEA) or his/her opportunity to work towards a regular high school diploma (ESSA).

Cap on participation in alternate assessment: Procedures must be put in place to prevent the inclusion of more than 1 percent of students, statewide, in the alternate assessment.

Response:

Under ESSA, states may set their own definition for a student with significant cognitive disabilities. The SDE is currently bringing stakeholders together to create Idaho's definition and this individual and comment will be incorporated. To be involved, contact Dr. Charlie Silva at csilva@sde.idaho.gov.



School quality indicator

Comment(s):

Give quantitative information on this: This will indicate the credibility of Advanced level work in math ISAT-2/SBAC:

1) Math: Identify each school's 6th grade students who need remedial, at the grade level (7th grade math), and advanced (8th grade math, Algebra-1) when they enter 7th grade.

2) Math: Advanced Middle School, grade 7: How many students are taking 8th grade math, and Algebra-1. Grade 8: How many students are taking Algebra-1, and Geometry.

3) Math: High School: How many students in grade 11 score in specific range for SAT Math: 200-300, 300-400, 400-500, 500-600, 600-700 and 700-800.

4) Math: How many students are taking AP Calculus as in AP Calculus AP and AP Calculus BC.

I see that the School Quality indicator for K8 is a student satisfaction & engagement survey. I also see that the school quality indicator will have a weight of 10%. However, I don't see how the student satisfaction & engagement survey will be measured? Will 90%+ satisfaction be worth 10 points and, therefore, give the school the full 10% for the school quality indicator? Or will 75%+ satisfaction be worth 10 points and, therefore, give the school the full 10% for the school quality indicator? These are, obviously, examples. The point I am trying to make is that it would be helpful to know how these student surveys will be measured. My recommendation is to add this information into the plan.

Table 12 - School Quality Indicators: Will there be a metric to use to understand the survey?

Response:

The school quality indicators were set by the State Board of Education when it approved Idaho's Accountability Framework in 2016 and by the legislature when it approved the Framework during the 2017 session.

Idaho plans to deploy a student survey for grades 4-12. The state will ask a committee of experts with making a recommendation on how to use the data to make determinations for school identification. Details for the use of all indicators for school identification will be made available well in advance of the first round of school identification as part of the Idaho's implementation of its plan.



Standards

Comment(s):

There is a serious problem with mathematics standards from grade 1-high school (Algebra-2). There is nothing in trigonometry, analytic geometry and combinatorial (pre-Calculus). The mathematics standards have been discussed at length with April 21, 2016 forum at Idaho Falls, and posted on SDE webpage. However, every suggestions have been rejected for the reasons I disagree.

1) Math standards are not high enough.

2) Missing topic is linear & matrix algebra. This course is missing from School District 91, but must be offered to STEM bound curriculum in college. Matrix Algebra is needed, but not part of the curriculum. Topics in matrices should be about how to solve linear equations through Gaussian elimination, finding inverse of matrix, matrix diagonalization (with computers) of both 2×2 , and higher order matrices, property of coordinate rotation, unitary transformation).

3) Teachers must give complex and challenging problems. Textbooks approved by State Board of Education are lower levels. Must give every teachers appropriate supplementary books on mathematics. Examples are Singapore Math's Intensive Practice, US Edition, and Challenging Word Problems for Primary Mathematics. For High School and Junior High School Mathematics, provide teachers with Singapore's Math textbooks & workbook (that includes Additional Mathematics). These books have excellent problems that provoke thinking.

3) Aim must be for students to gain mathematical maturity, which means that students must be in position to solve complex problems that integrate multiple topics, and requires thinking.

4) Include times table from $x11$ to $x20$. Those school practice this will get their students achieve math proficiency at very high level when compared with those learning times table up to $x10$. Mental computation of products, determination through inspection of digit whether quotient of two numbers has remainder. This is not part of the common core, but teachers must be required to teach this topic. Mathematical proof is simple. When this is done, students will learn algebraic thinking.

Response:

The Idaho Content Standards are recognized as a set of rigorous expectations for students. However, state standards serve only a minimum requirement for the content students must learn in the classroom. Districts may go above and beyond the Idaho Content Standards in any or all grades and subjects at their discretion.

Curriculum serves as the material with which educators equip students to meet Idaho Content Standards expectations. Idaho does not set curriculum at the state level – this decision is left to local school boards.



Statute and administrative rules

Comment(s):

I'm writing with regards to proposed administrative rule 08-0202-1607 as it specifically relates to para-educators. The specific section I am highly concerned about is summarized below:

10. Para-Educator. Aides and assistants employed by school districts to supplement instruction and provide additional assistance to students. Paraprofessional. A noncertificated individual who is employed by a school district or charter school to support educational programming. Paraprofessionals must work under the direct supervision of a properly certificated staff member for the areas they are providing support. Paraprofessionals cannot serve as the teacher of record and may not provide direct instruction to a student unless the paraprofessional is working under the direct supervision of a teacher. To qualify as a paraprofessional the individual must have completed at least two (2) years of study at an accredited postsecondary educational institution, obtained an associate degree or higher level degree; demonstrate through a state approved academic assessment knowledge of and the ability to assist in instructing or preparing students to be instructed as applicable to the academic areas they are providing support in. Individuals who do not meet these requirements will be considered classroom. (3-16-04)()

To be clear, the way the rule reads without an "or" in the paragraph, our para-educators would have to meet all three requirements:

2 years of study at a postsecondary educational institution, and

obtain an associate degree or higher level degree, and

demonstrate through a state approved academic assessment (Praxis) knowledge of and the ability to assist in . . .

We have many paraprofessionals in our district who not be eligible for hire under these new guidelines. We rely on the Praxis to hire individuals to work in our schools.

Response:

Under ESSA, states are required to have qualifications for paraprofessionals that "were in place on the day before the date of enactment of the Every Student Succeeds Act." As a result, Idaho adopted in 2017 the following qualifications for paraprofessionals (IDAPA 08.02.02.007(10)):

To qualify as a paraprofessional the individual must have a high school diploma or general equivalency diploma (GED) and:

- i. Demonstrate through a state approved academic assessment knowledge of and the ability to assist in instructing or preparing students to be instructed as applicable to the academic areas they are providing support in; or



- ii. Have completed at least two (2) years of study at an accredited postsecondary educational institution;; **or**
- iii. Obtained an associate degree or higher level degree; demonstrate through a state approved academic assessment knowledge of and the ability to assist in instructing or preparing students to be instructed as applicable to the academic areas they are providing support in.

In other words, paras must have a high school diploma or GED; AND

1. Pass a state approved assessment (Para Praxis); OR
2. Have completed 2+ years of college; OR
3. Obtained an associate degree or higher, pass a state approved assessment

Individuals who do not meet these requirements will be considered school or classroom aides.

Idaho's Every Student Succeeds Act State Consolidated Plan does not propose changes to Idaho statutes or administrative rules, including those for paraprofessionals. Any changes to Idaho law that are intended to bring policy in line with Idaho's plan will be carried out in 2018 with opportunity for public input. Individuals seeking changes to these rules should contact the Idaho State Board of Education.

Statewide assessments

Comment(s):

It's important that the academic indicators for achievement for K-8, HS, and Alt HS be based on valid and reliable sources, and the results need to provide information that can be used to identify individual learning gaps and help improve instruction. The current ISAT does not meet that standard. A better (than ISAT) High School academic indicator that is also a College and Career readiness standard would be a college entrance exam with cut scores based on a statewide analysis of results. School quality metrics for K-8 might include a measure of annual academic growth for students and at the high school level, the number and/or percentage of students involved in Advanced Opportunity programs and/or Career and Technical certificates earned. Keep it simple, relevant, and understandable.

Assessment: Writing in SAT is not indicative of writing skills. In school, students learn how to write, and they go through several draft to produce finished product. In SAT writing, students do not have the time to write an essay as finished product in 50 minutes. In reality, in colleges, it takes long time to write paper that is the finished product. SAT writing gives College Board the money, but remains irrelevant to students.



Accountability: Make SAT scores by school public. This is needed for parents to discuss quality of education with the school administrators several years prior to taking courses.

2) Have the Board and the Administrators hold question & answer session in the spirit of UK Parliament's Prime Minister Questions. This is needed so that the Administration at the highest level know the problem and answer questions.

3) Create SDE or Board of Education office of Ombudsman. The role is to comply the local officials to obey relevant laws (e.g., textbook selection process that requires non-educators to served on those committees).

There is no mention of using the currently required college entrance exam as an alternate form of assessment for high school. It seems this is both an expensive and time-consuming effort each year that yields significant data with regard to college readiness, and should be included. Additionally if students can be given the option of meeting the ISAT exit exam requirement in 9th grade, it would allow students who are already proficient to check this box off early and turn their attention to college/career readiness efforts.

We should be using college entrance exams (ACT/ SAT) for accountability as well. How do we address poor go on success without looking at these?

The Idaho ESSA plan clearly states the statewide ISAT scores in Mathematics and English Language Arts used for academic indicators (i.e., percents proficient or above) have met validity and reliability criteria as outlined in the Federal Assessment Peer Review Guidance (pg. 16). However, this is simply not the case.

The Federal Assessment Peer Review Guidance, Revised 2007 (FAPRG) was written to implement NCLB. Under NCLB, there were two federal definitions for "proficient," the NAEP definition and the NCLB definition. The NAEP definition of "proficient" was equivalent to a classroom grade of A. The ISAT definition of "proficient" included the grades C and B, representing grade-level expectations.

According to FAPRG, the on-site peer review team's task is to verify that the state's "proficient" achievement level represents attainment of grade-level expectations for that academic content area. In the previous ISAT, implemented for NCLB, the state "proficient" achievement level did represent attainment of the state's grade-level expectations.

Here's the rub. The SBAC/ISAT developers made the ISAT achievement levels mirror the NAEP achievement level. Thus, interpretations that apply to NAEP achievement level results now apply to the SBAC/ISAT achievement levels. Since NAEP proficient was akin to an A, the ISAT proficient



is now akin to an A. I doubt seriously that anyone thinks an A actually represents Idaho's grade-level expectations. SBAC/ISAT "basic" represents Idaho's grade-level expectations, period. ISAT "basic" is now the same as NAEP "basic," which includes students who are "proficient in the subject," using the common language meaning for the term.

The Idaho Consolidated State Plan: The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (June 19, 2017, submitted for public comment) claims that the plan's academic indicators, the other academic indicator, and the selected graduation rate calculation have been shown to be valid and reliable.

Validity and reliability (pg. 16): Both academic indicators [i.e., percentage of students scoring at or above the proficient achievement level] are calculated using statewide test scores in Mathematics and English Language Arts. The ISAT has met validity and reliability criteria as outlined in the Federal Assessment Review.

Validity and reliability (pg. 17): Idaho's analyses have shown the other academic indicator [i.e., difference in the percentage of students scoring at or above the proficient achievement level] to be valid and reliable.

Validity and reliability (pg. 19): The federally-required four-year cohort graduation rate has been shown to be valid and reliable.

Where is the actual evidence (or links to the evidence) supporting these three claims of "validity and reliability" posted on the Idaho State Board of Education website for public review?

Response:

Statewide academic assessments must pass a rigorous federal peer review process in order to be accepted as valid and reliable measures of students achievement in grades 3-8 and once in high school. Idaho, along with a number of other states submitted our ISAT assessment in ELA and Math for federal peer review in 2015. Not only was the ISAT approved, it has been one of the highest-rated assessments in this process.

The graduation rate methodology is also set at the federal level.

However, no single assessment can give a complete picture of student progress. This is why Idaho's Accountability Framework will use measures beyond ISAT scores in reading and math in order to report on school progress.

There is ongoing discussion related to the best way to assess students in high school. The ISAT in high school is aligned to the Idaho Content Standards and is therefore able to give educators student results that are consistent with the assessments administered in grades 3-8. The SAT and ACT are not designed for this purpose and are instead intended as a measure of college readiness, though students who perform well on the ISAT assessments tend to also perform well



on the SAT or ACT. Neither the SAT or ACT have passed federal peer review as of this writing, meaning Idaho must wait for these assessment companies to address concerns of federal peer reviewers before the assessments can be used for accountability purposes.

Idaho's Accountability Framework includes measures of college and career readiness (which incorporates Advanced Opportunities and industry certificates) and student growth.

[Based on feedback from schools and administrators, The SAT writing component will not be offered as part of the statewide contract beginning in 2017-18.](#)

~~The SAT writing component has been removed as a required component beginning in 2017-18.~~ SAT scores for each school will be publicly reported as part of the Accountability Framework on the school report card.

Because Idaho's school quality indicators are new, Idaho must begin collecting data and analyzing results to determine if they are valid and meaningfully differentiate schools. We look forward to sharing these analyses once they are available.

The SDE cannot require that administrators adopt specific practices related to community engagement. The State Board of Education holds an open forum each meeting, and State Board of Education members and staff are available by phone or email to answer questions.

Summative rating

Comment(s):

Summative rating: Every school should be given a summative rating that reflects the performance of the school overall, for all indicators and for each individual subgroup (no combined subgroups). A breakdown of this data on a "dashboard" can be used in addition to the summative rating. I noticed on page 189 of the Idaho ESSA recommendations there were no summative ratings for each school (in addition to a dashboard of data), which would violate federal proposed regulations.

Response:

Stakeholder feedback in Idaho overwhelmingly favored a school accountability system that does not include a summative rating. During feedback opportunities conducted by the State Department of Education and the Office of the State Board of Education around the state, participants were concerned that a summative rating oversimplifies the results for a school. Stakeholders shared that they preferred a system that provides them with information so that can draw their own conclusions about a school.