



Illinois State Board of Education

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www.isbe.net

James T. Meeks
Chairman

Christopher A. Koch, Ed.D.
State Superintendent of Education

January 30, 2015

Dear Superintendent and Board President:

We write in response to the position certain districts have taken or are threatening to take regarding the administration of the Partnership for Assessment of Readiness for College and Careers, or PARCC assessment. We send this letter to make it clear that all districts must administer the PARCC assessment to all of their students unless the students are specifically exempt under federal law.¹

Section 6311 (b)(3) of Title I of the Elementary and Secondary Education Act (ESEA) requires a State Educational Agency (SEA) that receives funds under Title I, Part A of the ESEA to implement in each Local Educational Agency in the State a set of high-quality, yearly academic assessments that include, at a minimum, assessments in mathematics and reading or language arts. The assessment must be the same for all students and must be administered in grades 3 through 8 and once at the high school level. The U.S. Department of Education (USDOE) confirmed these requirements in a letter sent to us in December, a copy of which is attached.

As you will also see in the letter from the USDOE and as is clear from federal law, as the State Education Agency, we are responsible for the compliance of all districts with these federal requirements. Therefore, we are directing you to administer the PARCC assessment to all students except those who are specifically exempted under law. If any district does not test, ISBE will withhold its Title I funds. We will also seek to recoup the state funds spent on any test booklets unused by the district, as well as any restocking fees charged to ISBE by our testing vendor.

Further, all currently funded Title I School Improvement Grant (SIG) Section 1003(g) schools are required to administer the state accountability assessment pursuant to the terms of these grant awards and the assurances signed by all districts in receipt of these funds. Any district that has a SIG grant and fails to administer the PARCC exam will jeopardize its funding. Because districts must report data to ISBE on performance of students on the assessment, any school without fiscal year 2015 PARCC data would be eliminated from eligibility for all SIG continuation grants or new SIG grant awards.

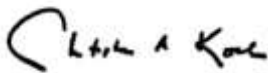
¹ One exception to the general requirement that a State's assessment must be the same for all students is the authority in the Title I regulations for an SEA to adopt alternate academic achievement standards and alternate assessments aligned with those standards for students with the most significant cognitive disabilities. See 34 C.F.R. §§ 200.1(d), 200.6(a)(2)(ii)(B). Another exception is students who have been determined to be English Learners and have been in a school in the United States for less than 12 months. See 34 C.F.R. § 200.6(b)(4).

In addition, both Title III of ESEA and the Individuals with Disabilities Education Act (IDEA) require that English Language Learners and Students with Disabilities, respectively, be tested unless specifically exempt. In order to receive funds under these statutes, districts must sign assurances that they will comply with all state and federal laws. Therefore, ISBE will withhold Title III and IDEA funds from any district that fails to administer the PARCC exam.

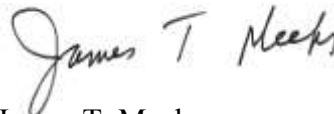
Finally, ISBE is also prepared to take recognition action pursuant to 23 Ill Admin. Code 1.20 against any district that fails to properly administer the PARCC exam to all students. As you are aware, a non-recognized district will lose General State Aid funding.

Please understand that if a district does not administer the assessment, it not only places the district at risk of losing federal funds but it also places the entire State at risk of losing federal funds. According to communications with USDOE, if ISBE fails to sanction a district for failure to test, USDOE will withhold federal funds from the State. In addition, USDOE has made clear that noncompliance with the assessment requirement also places Illinois at risk of losing its No Child Left Behind (NCLB) waiver. ISBE must and will enforce the provisions of ESEA as required by federal law so that ISBE does not place the State at risk of action by the USDOE and because we are committed to implementing valid and reliable performance measures for our schools.

Sincerely,



Christopher A. Koch, Ed.D
State Superintendent of Education



James T. Meeks
Chairman, State Board of Education