



Board of Education

City of Chicago

David J. Vitale
PRESIDENT

Office of the Board
1 North Dearborn Street, Suite 950, Chicago, Illinois 60602
(773) 553-1600 Fax (773) 553-3453

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February 24, 2015

Rev. James Meeks, Chairman
Illinois State Board of Education,
100 N. First Street
S405
Springfield, IL 62777

Dr. Christopher Koch, State Superintendent
Illinois State Board of Education
100 N. First Street
S405
Springfield, IL 62777

Dear Chairman Meeks and State Superintendent Koch,

We write today with the request that ISBE strongly consider the proposal outlined below and provide CPS the same consideration that the federal government provided to the State of Massachusetts with respect to compliance with the federal testing requirement.

Chicago Public Schools believes deeply in the Common Core State Standards. We have been implementing the Common Core for three years and recent gains on NAEP, and NWEA are evidence that the Common Core is working in Chicago. Chicago Public Schools also believes in PARCC. We believe that PARCC will ultimately be a valid measure of achievement of the Common Core State Standards and we are supportive of the use of PARCC in Chicago, Illinois, and in other PARCC consortium states.

However, our primary concern regarding the administration of PARCC this year is that PARCC will essentially measure our students' ability to navigate the PARCC software and not their true content knowledge of the Common Core State Standards. In addition, we remain concerned that scheduling technology resources will disrupt class schedules beyond the loss of instructional time for students actually taking PARCC.

As you know, CPS willingly volunteered to participate in ISBE's PARCC field test last school year. We did so because we wanted to understand how this assessment would perform in Chicago's urban environment. These insights could have been used to inform the preparation of administrators, teachers, and students for full PARCC implementation and help answer questions about how best to schedule students through computer labs. The results also could have answered questions about how PARCC performs for students from low income neighborhoods or whether there are cultural biases embedded within the assessment. Unfortunately, the results of the field test were never shared with CPS in a way that provided clarity to these concerns.

This is why we remain committed to the approach of administering PARCC to a 10% sample of CPS schools. The 10% sample will provide the valuable information necessary to prepare administrators, teachers, and students for the full administration of PARCC in the 2015-16 school year.

As such, we request that ISBE grant CPS the same courtesy that the US Department of Education granted to the State of Massachusetts when they were allowed one additional year to come into compliance with the federal testing requirement. If granted, CPS will commit to providing ISBE with a detailed plan that will outline the steps that will be taken to come into compliance with the state mandate in the 2015-16 school year.

CPS is uniquely positioned to be granted this consideration due to the maturity of the assessment and accountability system that is currently in place in our district. NWEA, CPS' elementary assessment, and Explore, CPS' high school assessment for 9th graders, are used to determine school accountability ratings and teacher evaluation results. Both assessments are rigorous, valid and reliable measures of student achievement that have alignment to the Common Core.

In addition, we propose that an analysis be conducted by the University of Wisconsin to link the NWEA and Explore results to the results of the 10% PARCC pilot that we would conduct. This analysis could generate a PARCC score for every eligible student in Chicago and meet the spirit of the ISBE mandate.

CPS would be more than happy to work with ISBE to submit a joint waiver application to the US Department of Education under Section 9401 of the *Elementary and Secondary Education Act* or participate in any additional discussions with the federal government that are necessary.

If CPS were forced to administer PARCC to all eligible students this school year, we would also have to continue administering our district assessments in order to provide school ratings and conduct teacher evaluation - resulting in double testing. Instead of administering just 3 hours of assessments through NWEA and Explore, requiring PARCC for every eligible student will result in 10 additional hours of testing or 13 total hours of testing for 230,000 students, which is close to 3 million student hours of testing and a significant loss of instructional time.

The ISBE letter of January 30th sent to all districts identified a wide possible range of sanctions that the state could use to punish districts who fail to administer PARCC to all eligible students. In the absence of clearly articulated specific consequences that the state would employ to force the administration of PARCC on the City of Chicago, it is difficult to determine the impact of ISBE's potential actions on our district.

However, if federal and state aid are withheld from CPS, it would destroy our students' ability to achieve the best possible education. For example:

- Title I, which provides supplemental services for low income students, represents about \$300M of the nearly \$900M in federal funds we expect to receive this year. If Title I funds were eliminated schools would lose discretionary funding that is used for more than 1,200 positions, including 824 teachers, 103, teacher assistants, 87 security officers, and 18 counselors. Funding for Pre-K programs at Child Parent Centers would be eliminated resulting in 2,300 children losing access to programs.
- Federal IDEA provides \$100 million in support for our students with diverse learning needs. If these funds were withheld, 988 staff would be eliminated including 716 teachers and 103 paraprofessionals who provide direct support to our students.

And if ISBE decided to end recognition of CPS as a district and withhold \$1 billion in general state aid, it would jeopardize our ability to fund thousands of teaching and instructional support positions as well as our ability to pay our pension obligations.

With the testing date rapidly approaching, we believe that our proposal to administer PARCC to a 10% sample of schools and provide an equated PARCC score for all eligible students in Chicago - while continuing to administer our Common Core aligned district assessments is the most appropriate plan for Chicago's students.

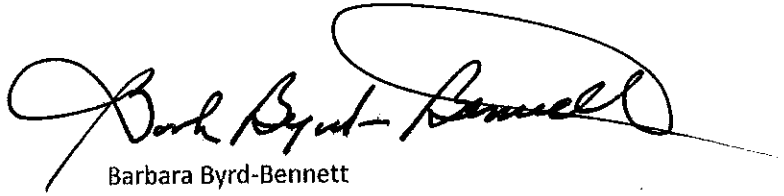
We respectfully request the time and information necessary to successfully roll out the PARCC assessment in a thoughtful and deliberate manner.

We look forward to your response at your earliest opportunity.

Sincerely,



David J. Vitale
President, Chicago Board of Education



Barbara Byrd-Bennett
Chief Executive Officer