



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

November 16, 2015

The Honorable Bruce Rauner  
Governor  
Office of the Governor  
207 State House  
Springfield, IL 62706

Dear Governor Rauner:

I am writing in response to Illinois' request to amend its approved Race to the Top grant project, including revisions to the project period to implement a portion of its plan. Between July 15, 2015, and October 26, 2015, the State submitted documentation to, and held conversations with the U.S. Department of Education (ED) to support amendment requests to its approved Race to the Top plan. ED has the authority to approve amendments to your plan and budget, provided the revisions do not change the overall scope and objectives of the approved proposal. In June 2014, ED issued *Amendment Requests with No-cost Extension Guidance and Principles*, indicating the process by which amendments containing request to provide additional time for a grantee to accomplish the reform goals and deliverables it committed to in its Race to the Top application and approved Scope of Work would be reviewed. To determine whether approval could be granted, ED has applied the conditions noted in the document, and compared it with the Race to the Top program *Principles*, which are also included in that document.

I approve the following amendments, including timeline extensions, as described below.

- In the Illinois State Board of Education (ISBE) Capacity project under sub-criterion (A)(2), shift \$274,745.90 to Year 5 and extend the State's project period to December 31, 2016. The funds will continue to support State personnel to provide grant oversight, communications, reporting, and support to participating Race to the Top local educational agencies (LEAs) during Year 5<sup>1</sup>.
- In the LEA Support and Regional Capacity project under sub-criterion (A)(2), shift \$119,100 to Year 5 and extend the State's project period to September 30, 2016. ISBE will utilize funds to extend the contract for seven coaches to continue to provide supports, technical assistance, and monitoring of participating LEAs in Year 5. The State will also hold two regional networking events for participating LEAs in winter and spring 2016 with a focus on sustaining Race to the Top initiatives and grant closeout.

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<sup>1</sup> As part of ISBE's budget process, the State reviews its actual expenditures in comparison to its original budget and identifies any funds that are unexpended across all projects. ISBE reallocates the unexpended funds to other projects according to needs, some of which are described throughout this amendment letter.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

- In the Establish the Illinois Collaborative for Education Policy Research (ICEPR) project under the (C)(3) sub-criterion, extend the State’s project period to December 31, 2016. ISBE originally planned to contract with a lead research entity by December 2014 to perform the responsibilities of the ICEPR project throughout Year 4. However, as a result of significant procurement challenges which impacted ISBE’s ability to secure a lead research entity, the State will now complete this project in Year 5. Specifically, ISBE will secure a contract with a lead research entity and establish a research agenda with a focus on how policies and programs promote student growth and close achievement gaps. The lead research entity will also be responsible for conducting ad-hoc research requests for the State, working with LEAs to building local capacity to support research, and the dissemination of data and research findings in a manner consistent with State and federal privacy and protection laws. No Race to the Top funds will be needed to complete this project.
- In response to a condition placed on the Illinois’ scope of work approval, the State committed to conducting a validation study to demonstrate that student growth as measured by the assessments selected by participating LEAs is correlated to student growth as measured by the State assessments and outline what actions the State will take in response to the results.<sup>2</sup> The State submitted to ED an interim report in fall 2014 and a final report was to be submitted by December 2015. The State requests to extend the date for submission of the report until March 31, 2016 due to delays in receiving data from the statewide assessments administered during the 2014-2015 school year. No additional Race to the Top funds will be needed to complete this report.
- In the Performance Evaluation Advisory Council (PEAC) Supports for Accelerated Performance Evaluation Reform Act of 2010 (PERA) Implementation project under the (D)(2) sub-criterion, shift \$54,066 to Year 5 and extend the project timeline to June 30, 2016 for two activities. First, Race to the Top funds has supported a survey of learning conditions at the district level. The initial year was school year (SY) 2012-2013 and the State would like to administer the survey during SY 2015-2016. The State and LEAs point to the value in having data to support improving the learning climate and LEAs point to the survey as a tool to increase parent involvement. Second, based on feedback from the field, the State will convene participating Race to the Top LEAs with non-participating LEAs to provide training and share lessons learned on the implementation of teacher and principal evaluation and support systems. In addition, the State will continue to fund PEAC to continue to identify needs in the field related to PERA implementation and develop corresponding guidance and resources.
- In the Teacher and Principal Induction and Mentoring project under the (D)(5) sub-criterion, shift \$161,279 to Year 5 and extend the project timeline to December 31, 2016. These funds will continue induction and mentoring supports provided to participating LEAs and sharing of best practices across the State. Further, ISBE plans to utilize funds identified from outside of the grant to fund competitive grants to LEAs to continue induction and mentoring programs established at the local level and promote sustainability beyond Race to the Top.

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<sup>2</sup> For additional information, see ED’s August 6, 2012 scope of work approval letter here: <http://www2.ed.gov/programs/racetothetop/sow-letters/illinois.pdf>.

Illinois also submitted a request to revise the project period for LEAs to implement their Scopes of Work. In June 2014, ED issued “Amendment Requests with No Cost Extension Guidance and Principles” indicating the process by which amendments containing requests to provide additional time for a grantee to accomplish the reform goals and deliverables it committed to in its Race to the Top application and approved Scope of Work would be reviewed and approved or denied. In order to consider amendment requests with no-cost extensions, ED indicated that States must address the timelines and implications of the amendment on the 50 percent LEA subgrants (i.e., allocations to participating LEAs), as well as the process the State will use to review LEA subgrant requests to obligate and liquidate funds after the current project period. To determine whether approval could be granted, ED has applied the conditions and elements specific to no-cost extensions noted in the document, and compared it with the Race to the Top program *Principles* included in the “Grant Amendment Submission Process” document issues to Governors of grantee States.

Through conversations with Illinois and documentation submitted as part of this amendment request, we understand that the State will begin to review requests from participating LEAs to extend the project period to complete Race to the Top activities on a case-by-case basis. ED generally approves the State’s process as described in Appendix 1. Prior to December 31, 2015, ED expects the State to submit a record of each participating LEA project approved by the State for a no-cost extension and the total funding approved for the LEAs’ Year 5 Scopes of Work.

ED understands that this amendment will not result in a change in your State’s performance measures and outcomes, nor will they substantially change the scope and objectives of the work. Please note that by law all Race to the Top funds revert to the U.S. Department of Treasury as of October 1, 2017. ED expects grantees with no-cost extensions to liquidate all funds by April 3, 2017. This letter will be posted on ED’s website as a record of the amendments.

If you need any assistance or have any questions regarding Race to the Top, please contact Karen Dorsey Hargrove at (202) 453-6695 or [OSS.Illinois@ed.gov](mailto:OSS.Illinois@ed.gov). Thank you for your continued commitment to enhancing education for all of the Illinois’ students.

Sincerely,

/s/

Monique M. Chism, Ph.D.  
Director  
Office of State Support

cc: Dr. Tony Smith, State Superintendent  
Julie Evans, Race to the Top Director

Attachment: ISBE LEA Process

**Attachment 1: ISBE Race to the Top LEA Review Process – No-cost Extension Year**

**Appendix 1:** Process the State will use to review local educational agency (LEA) subgrant requests to obligate and liquidate funds after the current project period, as described by the Illinois State Board of Education (ISBE).

ISBE will review LEA requests for a no cost extension on a case by case basis, any districts interested in getting a no cost extension will go through a three-step process. Those districts not seeking an extension will have until November 15<sup>th</sup> to expend funds from the grant. Any unexpended funds from those districts will then revert back to the initial LEA formula for allocation funds and be redistributed to the districts getting a no cost extension by December 31<sup>st</sup>, 2015.

Each LEA seeking a no cost extension will submit a letter of intent (signed by the LEA superintendent and the teachers' union president) no later than October 31<sup>th</sup> (See Appendix 1A for a detailed explanation of LEA timeline). After a letter of intent has been submitted, ISBE staff will work with the districts to gather the remaining documentation for the final step in the application for a no cost extension.

Final determination on extending the grant will be based on a review of the following criteria;

1. Submit a narrative detailing how being granted an extension will allow them the additional time to progress and accomplish the goals of Race to the Top. Describe how the work to be done will align to their original scope of work and the goals of Race to the Top (See Appendix A for Race to the Top expectations). Express how the extension will impact student growth and achievement.
2. The district submits an amended Scope of Work (SOW) detailing out the progress made to date, and the projects and timeline for completion on the initiatives they want to get a no cost extension on.
3. Submit an amended budget to address possible carry over funds for the extended period. All final budget amendments for the no cost extension will go through the same LEA process currently in place through the eGrant Management System and Illinois Web Application Security (IWAS). Budget amendments will be submitted and go through three levels of review; two at the program level and the third at the fiscal level. This process is in place to ensure all applications adhere to the goals and objectives of the funding source.
4. Commit to developing a sustainability plan for the initiatives, the Center for Performance partnered with the Building State Capacity and Productivity Center at Edvance Research, Inc. to train staff and district staff on sustainability. Each district will commit to developing a sustainability plan, and agree to submit the plan to ISBE on or before December 22, 2015.
5. Other factors that will be used to determine an extension; responsiveness to Race to the Top request, participation in Race to the Top district conferences/networking events, submission of required reports and metrics and overall alignment to the State's no cost extension.

The factors that will be taken in to consideration when not approving an LEA for a no cost extension include, but are not limited, to the following;

1. LEA has had multiple findings from Federal and State Monitoring Division.
2. No clear direction and/or explanation of the benefit of a no cost extension.
3. The plan for extension does not align with Race to the Top goals and initiatives.
4. Application for extension includes goals and objectives that conflict with LEA assurances of the Race to the Top grant.
5. Lack of participation in the district networking groups and meetings.
6. LEA has low draw down of funds to date and has no clear outline for utilizing funds by the end of the grant.
7. Timeliness of submitting reports and surveys.

All LEA extension requests that are approved will be for a time period starting December 22, 2015 to December 31<sup>st</sup>, 2016.

Once granted an extension the LEA will commit to the extension, via the eGrants system, by the district administrator signing off on the assurances. Furthermore, by being granted an extension the LEA agrees to have their application for extension and amended scope of work posted to the ISBE Race to the Top website for transparency and accountability purposes.

### **RttT Timeline for LEA No Cost Extension**

#### **Illinois State Board of Education**

Step 1:

- Webinar concerning LEA no cost extension (Goal date for Webinar July 20<sup>th</sup>)
- Letter of Intent to apply for extension to ISBE by noon on July 31<sup>st</sup>, 2015

Step 2:

- LEA district applications for no cost extension due to ISBE by October 31<sup>st</sup>, 2015

Step 3:

- ISBE will review and respond to LEA's applications no later than November 20<sup>th</sup>, 2015
- If an extension is granted LEA's will have until November 25<sup>th</sup>, 2015 to go online and submit an amended and signed budget for the extension period.
  - o The online budget application process has legally binding assurances that only the districts administrator/superintendent can sign off on. Making their budget a legal agreement with ISBE.

### **RttT Expectations**<sup>3</sup>

- 1 CII1: The district implements the State-adopted survey of learning conditions or approved equivalent, subject to availability of RttT or State funding
- 2 CII2 & CII3: The district implements a comprehensive school continuous improvement process (either Rising Star or an approved equivalent)
- 3 IA01, IA02, & IA03: The district uses school and district performance information from resources such as the Illinois Shared Learning Environment (ISLE) and the redesigned State Report Card to support and build partnerships with municipal and civic leaders (IA02: community organizations; IA03: parental engagement)
- 4 IB01: The district establishes professional learning communities to support all aspects of the instructional improvement process
- 5 IA14: The district establishes systems to recruit and support strong instructional leadership at the school-level, and partners with teacher preparation programs to plan and implement pipeline strategies for High Poverty High Minority Schools
- 6 IA06: The district (a) performs requirements gathering, analysis, and systems enhancements needed for integrating local student and educator data with ISLE; and (b) implements a strategy to link student data across local systems to support the creation of integrated learner profiles
- 7 IA10: The district provides sufficient flexibility in the use of time and re-allocates professional development resources necessary for RttT plan implementation
- 8 IC05: The district establishes a cohesive curriculum, aligned to State standards, that addresses and incorporates the following: (a) critical student transition points as applicable (PreK to elementary, middle to high school, and high school to postsecondary), including the use of alignment teams across these transition points; (b) writing throughout the curriculum; (c) CCSS in Math and ELA across the

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<sup>3</sup> \*The Race to the Top Expectations are aligned to the indicators for the state's chosen continuous improvement model – Rising Star. The letters and numbers (e.g., IB01) preceding each Expectation are codes for the corresponding Rising Star indicators.

curriculum, including the concept of text complexity for ELA and application for Math; and (d) the CCSS Science framework (when adopted)

- 9 D7: The district establishes (a) a local assessment system that includes through-course, formative, and summative assessments in a coherent framework that supports standards-aligned instruction and, where appropriate, the measurement of student growth, and (b) a standards-based reporting system in Math, ELA, and Science
- 10 D9: For districts serving grades 9-12, the district establishes two or more Programs of Study promoting critical STEM application areas; for other districts, as applicable, the district establishes an individual learning plan program, commencing in 7th grade, that aligns to a Programs of Study model in the predominant feeder schools for high schools implementing STEM Programs of Study
- 11 D11: The district embeds learning maps as a central part of instructional practices at all grade levels (when learning maps are available through ISLE)
- 12 D13: The district's RtI implementation plan ensures targeted interventions and differentiated supports aligned to the new State Standards (CCSS)
- 13 RT3-1: The school district implements PERA's teacher evaluation requirements on a timeline that is at least as aggressive as the following: (1) for Chicago Public Schools, when required by PERA; (2) by September 1, 2014 for Participating LEAs within the lowest performing 20% of districts, as defined by ISBE; or (3) by September 1, 2015 for all other school districts. Participating LEAs must implement PERA with a "no stakes" student growth component by September 1, 2013. The district must also establish a formal peer evaluation system that is used for a significant portion of summative evaluations and can be used as part of evaluations during teacher remediation. The district must use positive performance evaluations as one of the criteria for selecting peer evaluators.
- 14 RT3-2: The district establishes a one-year induction and mentoring program for beginning principals and a two-year induction and mentoring program for beginning teachers, subject to the availability of RttT or State funding. In addition, the district uses positive performance evaluations as one of the criteria for selecting mentors.

**Participating LEA Assurances**

**Race to the Top – Grant Assurances**

1. The signing individual has all requisite power and authority to execute the assurances and submit the Participating LEA Scope of Work.
2. The signing individual is familiar with, supportive of, and committed to working on and implementing the Participating LEA Expectations as set forth on the Race to the Top 3, Participating LEA Expectations and State Supports Chart in accordance with the district ISBE-approved Scope of Work.
3. The LEA will comply with all of the terms of the Race to the Top 3 program and the SEA subgrant to the LEA.
4. The baseline information provided as part of the Participating LEA Data Request is accurate and complete.
5. The LEA will participate in all State-led efforts to undertake district networking activities, disseminate implementation models, and evaluate program results relating to implementation of the Participating LEA Expectations, as referenced above, and the State Race to the Top Phase 3 Plan.
6. The LEA will be responsive to State or U.S. Department of Education requests for information including on the status of the Participating LEA Scope of Work, its implementation, outcomes and any problems anticipated or encountered.
7. The LEA will participate in meetings, webinars and telephone conferences with the State to discuss (a) progress of the Participating LEA in implementation of its Scope of Work; (b) potential dissemination of resulting non-proprietary products and lessons learned; (c) plans for the subsequent year of the Race to the Top 3 grant period; and (d) other matters related to the Race to the Top Phase 3 grant and associated plans.
8. The LEA will work with State Race to the Top 3 personnel to determine appropriate timelines for project updates and status reports throughout the grant period.
9. If the Participating LEA has any Tier I or Tier II schools, it will seek to leverage School Improvement Grant funds to support implementation of the Participating LEA Expectations, as referenced above.
10. The LEA will only allocate its Participating LEA RTT3 allocation for expenditures relating to implementation of the Participating LEA Expectations as set forth in its ISBE-approved Scope of Work.
11. The LEA will participate in district network activity across all of the RttT3 Participating LEAs to develop Type II and Type III assessment frameworks (as described in the State RttT3 Application) and items which can be used on a district-wide basis by all teachers in a given grade or non-tested subject area.
12. The LEA will allocate ten percent (10%) of its Participating LEA allocation for developing and implementing Type II or Type III assessment frameworks and items (as described in the State

RttT3 Application).

13. The LEA will post to any website specified by the State or the U.S. Department of Education, in a timely manner, all non-proprietary products and lessons learned developed using funds associated with the Race to the Top Program grant.
14. The LEA agrees to serve as a pilot district for PARCC consortium and KIDS assessment.
15. The LEA will fully cooperate in the PERA Research-based Study.
16. The LEA will establish an induction and mentoring program of two years in duration for new teachers and one year for new principals by no later than the 2013-14 school year. The LEA will use positive performance evaluations as part of the basis for selecting mentors. The LEA will participate in State technical assistance and accountability infrastructure for induction and mentoring programs.<sup>4</sup>
17. The LEA acknowledges and accepts its responsibility to comply with these assurances and carry out the activities in its approved Scope of Work. If ISBE determines that the LEA is not meeting its goals, timelines, budget, or annual targets or is not fulfilling other applicable requirements, ISBE will take appropriate enforcement action, which could include a collaborative process between ISBE and the LEA, or any of the enforcement measures that are detailed in 34 CFR section 80.43, including temporarily withholding funds, disallowing costs, or terminating the LEA status as a Participating LEA.

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<sup>4</sup> Assurance 16 was amended. The original text was, “The LEA will participate in State technical assistance and accountability infrastructure for induction and mentoring programs.”