

**PLANNING, POLICY AND GOVERNMENTAL AFFAIRS**  
**FEBRUARY 18, 2026**

<b>TAB</b>	<b>DESCRIPTION</b>	<b>ACTION</b>
<b>1</b>	<b>IDAHO STATE DEPARTMENT OF EDUCATION – ED FLEX APPLICATION AUTHORITY AREAS</b>	Action Item
<b>2</b>	<b>IDAHO STATE DEPARTMENT OF EDUCATION – DRAFT ESEA WAIVER APPLICATION</b>	Action Item

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**FEBRUARY 18, 2026**

**IDAHO DEPARTMENT OF EDUCATION**

**SUBJECT**

Idaho State Department of Education – Ed-Flex Application Authority Areas

**REFERENCE**

August 2017	Board approved Idaho's Consolidated State Plan for submission to the U.S. Department of Education.
February 2019	Board approved amendments to the Idaho Consolidated State Plan.
February 2024	Board approved technical corrections to the ESEA Consolidated State Plan.
June 2024	Board approved proposed amendments to the Idaho Consolidated State Plan, including adjustments to long-term goals for ISAT, graduation rates, and English Learner progress; and the ISAT growth model.
June 2025	Board received an update on federal flexibility options the Department was exploring.
December 2025	Board received a more detailed update on the Department's plans to develop an ESEA waiver application and pursue Ed-Flex State Status.

**APPLICABLE STATUTE, RULE OR POLICY**

Elementary and Secondary Education Act of 1965

Education Flexibility Partnership Act of 1999, as amended by the Every Student Succeeds Act of 2015 (ESSA)

Every Student Succeeds Act (ESSA):

- Title I, Part A (other than section 1111)
- Title I, Part C
- Title I, Part D
- Title II, Part A
- Title IV, Part A

Carl D. Perkins Career and Technical Education Act of 2006, as amended

**BACKGROUND/DISCUSSION**

Over the past year, the U.S. Department of Education (ED) has asked states to explore ESEA waivers and to consider pursuing an application for the Educational Flexibility (Ed-Flex) Program. These options are designed to “free [schools] from bureaucratic red tape” at the federal level, allow states to better meet local student achievement goals, and to shift greater authority of education to the states.

The Board discussed these options during their June 2025 and December 2025 Board meetings, including examples of implementation of the Ed-Flex Program in other states.

The Idaho Department of Education (Department) convened a Federal Flexibility Work Group, which includes administrators, federal program directors, assessment coordinators, and business managers. This group assisted the Department in exploring the available flexibility options, and has helped develop three initial recommendations, including applying for Ed-Flex State Status.

Ed-Flex is a program that allows the Secretary of the U.S. Department of Education to delegate to State Education Agencies (SEAs) the authority to waive certain statutory or regulatory education requirements that may hinder local efforts to reform and improve education. The program is designed to help Local Education Agencies (LEAs) and schools carry out educational reforms and raise achievement levels of all children through flexibility with the federal education programs.

SEAs may request this flexibility from specific federal regulations by submitting an application to ED. The application includes the following: how the SEA meets the eligibility requirements; a description of the educational objectives the state will meet through the flexibility plans; how the SEA will evaluate applications from the LEAs requesting waivers of the Federal statutory requirements; how the flexibility plan aligns and is consistent with the requirements in ESEA section 1111, subsection (b), (c), and (d); how the performance of students in the LEAs requesting waivers will be evaluated; and how the SEA will meet the public notice and comment requirements.

The waiver approval lasts for up to five years. Twelve (12) other states currently have Ed-Flex status.

Based on the conversations over the fall, the Department proposes that Idaho request Ed-Flex authority to grant LEAs waivers for the following:

- 1) Carryover Authority Waivers – allowing LEAs to carryover more than 15% of Federal funds across fiscal years.
- 2) Schoolwide Minimum Poverty Threshold Waivers – allowing LEAs to apply Title I funds to the entire school even if less than 40% of students are from low-income families.
- 3) Title IV-A Spending Flexibility Waiver – allowing LEAs flexibility with the Title IV-A categories and required percentage spending limitations in the three (3) categories.
- 4) Consolidation of Title Program Funds Waiver – allowing LEAs to combine funds to meet the district goals and the student needs.

The areas identified will allow LEAs to align their use of federal funds to their local strategic plans and goals. Additionally, receiving waiver approval will provide flexibility and local control over their funds, reduce red tape and lesson administrative burden, allow LEAs to develop long term sustainable interventions, support students with the highest needs, and improve school improvement efforts.

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The proposed Ed-Flex waiver authority areas have all been previously requested and approved for other Ed-Flex states and are included in ED documents encouraging SEAs to submit applications.

Finally, the Department has shared this list with the Federal Flexibility Work Group and their feedback is the basis for the areas chosen.

**IMPACT**

With Board approval of the four proposed areas for Ed-Flex authority, the Department will create an Ed-Flex application which will be brought to the Board prior to submission to ED.

If ED approves Idaho's Application for the Educational Flexibility (Ed-Flex) Program, LEAs will have the opportunity to seek waivers from the state rather than the federal government, giving them more control over their implementation of federal programs and use of funding. LEAs will experience shorter response times for their waiver requests and will have continuity in the program since waivers may be granted for up to five years.

**ATTACHMENTS**

Attachment 1 – Ed-Flex Application Template

**BOARD STAFF COMMENTS AND RECOMMENDATIONS**

Board staff supports the Department's plan to seek Ed-Flex State Status. Based on feedback from the Accountability Oversight Committee, staff has no significant concerns about the four authority areas proposed for inclusion in Idaho's application. Prior to Board approving the final application for submission to the U.S. Department of Education, it will be important for the Board and the Department to have clarity regarding the process that will be used to approve LEA waiver requests.

**BOARD ACTION**

I move to approve the following four waiver authority areas and permit the Idaho State Department of Education to use them to develop an Application for the Educational Flexibility Program: carryover authority, schoolwide minimum poverty threshold, Title IV-A spending flexibility, and consolidation of title program funds.

Moved by \_\_\_\_\_ Seconded by \_\_\_\_\_ Carried Yes \_\_\_\_\_ No \_\_\_\_\_

# Application for the Educational Flexibility (Ed-Flex) Program



**U.S. Department of Education**  
**Issued: June 13, 2019**

OMB Number: 1810-0737  
Expiration Date: March 31, 2027

## Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0737. Public reporting burden for this collection of information is estimated to average 40 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit under section 9207 of the Every Student Succeeds Act (ESSA). If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact the Office of Elementary and Secondary Education, U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 20202-3118 at OESE.titlei-a@ed.gov.

## Introduction

The Educational Flexibility (Ed-Flex) program is authorized under the Education Flexibility Partnership Act of 1999 and was reauthorized by section 9207 of the Every Student Succeeds Act (ESSA). The Ed-Flex program allows the Secretary to authorize a State educational agency that serves an eligible State to waive statutory or regulatory requirements applicable to one or more the included programs for any local educational agency (LEAs), educational service agency, or school within the State.

## Designation

Each eligible State participating in the Ed-Flex program shall be designated an Ed-Flex Partnership State.

## Covered Programs

This program permits Ed-Flex States to waive requirements of the following State-administered formula grant programs:

- Title I, Part A: Improving Basic Programs Operated by LEAs (other than section 1111);
- Title I, Part C: Education of Migratory Children;
- Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-risk
- Title II, Part A: Supporting Effective Instruction
- Title IV, Part A: Student Support and Academic Enrichment Grants
- The Carl D. Perkins Career and Technical Education Act.

## Duration of Ed-Flex

The Secretary will approve the applications for a period of not more than five years. The Secretary may extend the authority of an Ed-Flex Partnership State if the Secretary determines that the authority of the SEA to grant waivers has been effective in enabling the State or affected LEAs, educational service agencies, or schools to carry out their State or local reform plans and to continue to meet the accountability requirements, and has improved student performance.

## Waivers Not Authorized

The Ed-Flex program does not authorize an SEA to waive any statutory or regulatory requirements relating to:

1. Standards, Assessments, and Accountability requirements under section 1111 of the ESEA;
2. Maintenance of effort;
3. Comparability of services;
4. Equitable participation of students and professional staff in private schools;
5. Parental participation and involvement;
6. Distribution of funds to LEAs;
7. Serving eligible school attendance areas in rank order in accordance with section 1113(a)(3) of the ESEA;
8. The selection of a school attendance area or school under subsections (a) and (b) of section 1113 of the ESEA, except that an SEA may grant a waiver to allow a school attendance area or school to participate in activities under Part A of Title I if the percentage of children from low-income families in the school attendance area of such

school or who attend such school is not more than<sup>1</sup> 10 percentage points below the lowest percentage of such children for any school attendance area or school of the local educational agency that meets the requirements of such subsections;

9. Use of Federal funds to supplement, not supplant, non-Federal funds;
10. Applicable civil rights requirements; and
11. Any requirements that apply to the SEA.

An SEA may not grant any statutory or regulatory waiver unless the underlying purposes of the statutory requirements of the program for which a waiver is sought are met. Furthermore, requirements of the Individuals with Disabilities Education Act, or of any programs other than the ESEA programs referenced above and the Perkins program, may not be waived under the Ed-Flex waiver authority.

## State Oversight

Each Ed-Flex Partnership State must annually monitor the activities of LEA, educational service agencies, and schools receiving waivers through the Ed-Flex program.

## Report

Each Ed-Flex Partnership State must submit to the Department an annual report on the results of monitoring activities and the impact of the waivers on school and student performance. Each such State must include data demonstrating the degree to which progress has been made toward meeting the State's educational objectives. The data, when applicable, must include:

1. Information on the total number of waivers granted for Federal and State statutory and regulatory requirements, including the number of waivers granted for each type of waiver;
2. Information describing the effect of the waivers on the implementation of State and local educational reforms pertaining to school and student performance;
3. Information describing the relationship of the waivers to the performance of schools and students affected by the waivers; and
4. An assurance from State program managers that the data reported are reliable, complete, and accurate, as defined by the State, or a description of a plan for improving the reliability, completeness, and accuracy of such data as defined by the State.

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<sup>1</sup> 5891b(c)(1)(G) currently prohibits waivers of the selection of a school attendance area or school under subsections (a) and (b) of section 1113 of the ESEA, except that an SEA may grant a waiver to allow a school attendance area or school to participate in activities under Title I, Part A “if the percentage of children from low-income families in the school attendance area of such school or who attend such school is not less than 10 percentage points below the lowest percentage of such children for any school attendance area or school...” (emphasis added). We believe the emphasized language is an error and that this prohibition should mirror the language in ESEA section 8401(c)(10), which prohibits waivers of the selection of a school attendance area or school under sections (a) and (b) of section 1113 of the ESEA, except that the Secretary may grant a waiver to participate in activities under Title I, Part A “if the percentage of children from low-income families in the school attendance area or who attend the school is not more than 10 percentage points below the lowest percentage of those children for any school attendance area or school...” (emphasis added).

## Public Notice and Comment

Each SEA seeking waiver authority and each LEA, educational service agency, or school seeking a waiver under the Ed-Flex program must:

1. Provide the public with adequate and efficient notice of the proposed waiver authority or waiver, consisting of a description of the agency's application for the proposed waiver authority or waiver on each agency's website, including a description of any improved student performance that is expected to result from the waiver authority or waiver;
2. Provide the opportunity for parents, educators, school administrators, and all other interested members of the community to comment regarding the proposed waiver authority or waiver;
3. Provide the opportunity in accordance with any applicable State law specifying how the comments may be received, and how the comments may be reviewed by any member of the public; and
4. Submit the comments received with the application of the agency or school to the Secretary or the SEA, as appropriate.

## Completing and Submitting an Application

Each SEA must address all of the requirements identified below in its application for Ed-Flex. The Department will review applications as they are received.

Complete applications should be submitted to the Title I mailbox at [OESE.TitleI-A@ed.gov](mailto:OESE.TitleI-A@ed.gov).

## Application Review

Within 90 days of receipt of a complete application, the Department will issue a written decision that explains why such application has been approved or disapproved, and the process for revising and resubmitting the application for reconsideration.

The Department may approve an application only if it determines that the application demonstrates substantial promise of assisting the SEA and affected LEAs, educational service agencies, and schools within the State in carrying out comprehensive educational reform, after considering:

1. The eligibility of the State
2. The comprehensiveness and quality of the educational flexibility plan
3. The educational flexibility plan ensures accountability for the activities and goals described in such plan;
4. The degree to which the State's objectives:
  - a. Are clear and can be assessed; and
  - b. Take into account the performance of LEA, educational service agencies, or schools, and students, particularly those affected by waivers;
5. The significance of the State statutory or regulatory requirements relating to education that will be waived; and
6. The quality of the SEA's process for approving applications for waivers of Federal statutory or regulatory requirements and for monitoring and evaluating the results of such waivers.

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<b>Contact Information and Signatures</b>	
SEA Contact (Name and Position):	Telephone:
Mailing Address:	Email Address:
<b>By signing this document, I assure that all application contents are true and complete to the best of my knowledge, and I affirm each assurance listed at the end of the document.</b>	
Authorized SEA Representative (Printed Name)	Telephone:
Signature of Authorized SEA Representative	Date:

**Eligibility Information**

*Please check the assurances and provide the necessary information below to demonstrate eligibility for the Ed-Flex program.*

1.  The SEA has:
  - a. Developed and implemented the challenging State academic standards, and aligned assessments, described in section 1111(b) of the ESEA, and is producing the report cards required by section 1111(h) of such Act; or
  - b. If the State has adopted new challenging State academic standards under section 1111(b)(1) of the ESEA, made substantial progress toward developing and implementing such standards and toward producing the report cards required under section 1111(h) of such Act.
2.  The SEA will hold LEAs, educational service agencies, and schools accountable for meeting the educational goals described in the local applications and for engaging in technical assistance and, as applicable and appropriate, implementing comprehensive support and improvement activities and targeted support and improvement activities under section 1111(d) of the ESEA.
3.  The SEA has waived or will waive State statutory or regulatory requirements relating to education while holding LEAs, educational service agencies, or schools within the State that are affected by such waivers accountable for the performance of the students who are affected by such waivers.
  - a. Describe the State's authority to waive State statutory or regulatory requirements relating to education (i.e. provide legal citations to relevant statute or regulation).

**Descriptions**

1. Describe the process the SEA will use to evaluate applications from LEAs, educational service agencies, or schools requesting waivers of
  - A. Federal statutory or regulatory requirements; and
  - B. State statutory or regulatory requirements relating to education.
2. Describe the State statutory and regulatory requirements relating to education that the State educational agency will waive.
3. Describe the clear educational objectives the State intends to meet under the educational flexibility plan, which may include innovative methods to leverage resources to improve program efficiencies that benefit students.
4. Describe how the educational flexibility plan is coordinated with activities described in the Title I, Part A section of the SEA's approved consolidated State plan, consistent with subsections (b), (c), and (d) of section 1111 of the ESEA.
5. Describe how the SEA will evaluate (consistent with the requirements of Title I of the Elementary and Secondary Education Act of 1965) the performance of students in the schools, educational service agencies, and LEAs affected by the waivers.
6. Describe how the SEA met the requirements for Public Notice and Comment to:
  - A. Provide the public with adequate and efficient notice of the proposed waiver authority, consisting of a description of the agency's application for the proposed waiver authority, including a description of any improved student performance that is expected to result from the waiver authority.
  - B. Provide the opportunity for parents, educators, school administrators, and all other interested members of the community to comment regarding the proposed waiver authority in accordance with any applicable State law specifying how the comments may be received, and how the comments may be reviewed by any member of the public.
7. Submit as an attachment the comments received from Public Notice and Comment with the application of the SEA to the Department.

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**IDAHO DEPARTMENT OF EDUCATION**

**SUBJECT**

Idaho State Department of Education – Draft ESEA Waiver Application

**REFERENCE**

November 2016	Board approved pending rule creating the new statewide accountability system.
August 2017	Board approved Idaho's Consolidated State Plan for submission to the U.S. Department of Education.
February 2019	Board approved amendments to the Idaho Consolidated State Plan.
March 2020	Board waived the requirement for the spring 2020 ISAT administration and approved a waiver for flexibility related to accountability for submission to the U.S. Department of Education.
April 2020	Board approved waiver for accountability requirements and ISAT/alternate assessment (IDAA) administration.
June 2021	Board approved proposed rule Docket 08-0203-2101 and federal accountability waiver.
February 2024	Board approved technical corrections to the ESEA Consolidated State Plan.
June 2024	Board approved proposed amendments to the Idaho Consolidated State Plan, including adjustments to long-term goals for ISAT, graduation rates, and English Learner progress; and the ISAT growth model.
June 2025	Board received an update on federal flexibility options the Department was exploring.
December 2025	Board received a more detailed update on the Department's plans to develop an ESEA waiver application.

**APPLICABLE STATUTE, RULE OR POLICY**

Elementary and Secondary Education Act of 1965

Every Student Succeeds Act Section 1111(a)(3), (b)(1), (2)

Idaho State Board of Education Governing Policies & Procedures, Section V.B.8.

Idaho Code §33-110

Idaho Administrative code, IDAPA 08.02.03.111, 112, 114

**BACKGROUND/DISCUSSION**

Over the past year, the U.S. Department of Education (ED) has asked states to explore ESEA waivers and Ed-Flex state status to “free [schools] from bureaucratic red tape” at the federal level and allow states to better meet local student

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achievement goals. The Board discussed these options during their June 2025 and December 2025 Board meetings.

In addition to discussions over the summer and fall with other states and ED about options for Idaho, the Department convened a Federal Flexibility Work Group. This group includes administrators, federal program directors, assessment coordinators, and business managers. They assisted in the Department's exploration of federally available flexibility options and helped develop three initial recommendations, including:

- Spending and Reporting Flexibility in State Administration for Title and IDEA Programming;
- Assessment Waiver for 3rd Grade ISAT ELA and 11th Grade ELA and Math ISAT; and
- Apply for Ed-Flex State Status.

These draft recommendations just completed public comment through January 31, 2026. Attachment 3 provides an overview of these responses.

<b>ESEA Provisions That <u>Can</u> Be Waived</b>	<b>ESEA Provisions That <u>Cannot</u> Be Waived</b>
<ul style="list-style-type: none"><li>• <b>Assessments:</b> Requirements to administer statewide annual math and reading assessments</li><li>• <b>Accountability:</b> Requirements for the state's accountability system to identify schools for improvement</li><li>• <b>Interventions:</b> Requirements to intervene in low-performing schools</li><li>• <b>Transparency and reporting:</b> Requirements to annually publish report cards with various data points</li><li>• Any <b>individual requirements</b> referenced in this document (requirements under Direct Student Services, Equitable Per-Pupil Funding, IADA, etc.)</li></ul>	<ul style="list-style-type: none"><li>• <b>Fiscal requirements</b>, including: Allocations of federal funds to states and districts (e.g., Titles I, II, III, and IV formulas); Maintenance of effort; Comparability of services; Supplement not supplant</li><li>• <b>Civil rights requirements</b> under: Title VI of the Civil Rights Act of 1964; Title IX; Title II of the Americans with Disabilities Act; Individuals with Disabilities Education Act (IDEA)</li><li>• <b>Other one-off requirements:</b><ul style="list-style-type: none"><li>▫ Equitable participation of private school students</li><li>▫ Parental participation and involvement requirements;</li><li>▫ Requirements for the CSP</li><li>▫ Prohibitions on federal control of curriculum and instruction;</li><li>▫ Prohibitions on using federal funds for religious worship or instruction</li></ul></li></ul>

Additional details on the background of this proposal and the process for ESEA Waivers is provided in Attachment 1.

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The Department has developed a Draft ESEA Waiver Application, as provided in Attachment 2. The waiver application includes three proposals:

1. Using the Grade 3 Spring IRI in place of the Grade 3 ISAT in English Language Arts (ELA);
2. Replacing a single achievement test in high school (ISAT ELA and Mathematics) with a list of options for student selection; and
3. Extending the English Learner Exemptions to two years, rather than the one allowed under federal law, for IRI and ISAT ELA and Math.

With the Board's support, the Department intends to begin communicating with the U.S. Department of Education (ED) to gain insight on revisions that may or may not be needed to increase the likelihood of approval of Idaho's waiver application. The final application will be posted for public feedback and brought to the Board for approval prior to submission.

Based on feedback from the Division of Career Technical Education (CTE) related to the proposed changes to high school testing, the Board and Department have identified a need to address some potential unintended consequences to CTE processes and students. Staff from the Board, Department, and CTE will be meeting to identify solutions.

If any of the waiver proposals are approved by both the Board and ED, the Department will develop a detailed implementation plan to support educators and counselors in making appropriate process adjustments.

## **IMPACT**

If the Board accepts the Department's ESEA Waiver Draft as provided in Attachment 1, the Department will engage with ED to determine if changes should be made to increase its likelihood of approval.

If the waiver moves forward and is approved by both the Board and ED, adjustments to third grade spring testing and English Learner exemptions will begin in the 2026-27 school year. The proposed changes to eleventh grade testing will not be implemented until the 2027-28 school year to allow time for Board approval of the list of assessment options, Department development of an implementation plan for educators and counselors, and updates to data infrastructure.

## **ATTACHMENTS**

- Attachment 1 – ESEA Waiver Background and Process
- Attachment 2 – Draft ESEA Waiver Application
- Attachment 3 – Public Comments Summary
- Attachment 4 – Public Comments

## **BOARD STAFF COMMENTS AND RECOMMENDATIONS**

Board staff is supportive of the Department's efforts to identify opportunities for flexibility under ESEA, including their plan to begin discussions with ED about the proposed waiver ideas.

Based on internal and external feedback, staff recognizes that success of the proposed changes will be dependent on the Department identifying and addressing potential consequences and preparing to provide strong implementation support.

The Board's Accountability Oversight Committee (AOC) reviewed the waiver drafts on January 7 and January 30 and provided the following feedback on the current Draft Waiver Application:

- Proposal 1: The AOC is supportive of the concept of a single spring ELA assessment for grade 3. However, the AOC is concerned about the potential for lower quality data with a less rigorous test. The AOC is also concerned about the lack of test items covering writing.
- Proposal 2: The AOC is supportive of the idea of giving students choice and noted that students may already take tests that support their post-secondary path (in addition to the ISAT). They expressed concern about the loss of longitudinal data and the state's future inability to evaluate the health of the K-12 system and mathematics initiative efforts.
- Proposal 3: The AOC fully supports this proposal.

Board staff shares some of the concerns expressed by the AOC, but recognizes that there are ways to mitigate issues. For instance, staff recommends the Department work with our testing vendors to develop an Expanded Grade 3 IRI with better coverage of the state's academic content standards, including writing. The vendors have expressed a willingness to collaborate, which presents an opportunity to create an assessment that supports students' transition from foundational reading to deeper application of their reading skills, and the potential to align the IRI and ISAT scales to support connections between these tests.

Board staff is also supportive of the concept of student choice for high school testing. To minimize the impact of the loss of longitudinal data and support interpretation, staff recommends the development of crosswalks between ISAT scores and the other assessment options to the extent feasible. Staff also recommends the Department identify an appropriate mechanism to gather high school mathematics data, allowing for evaluation of efforts to improve middle grades math instruction and learning.

Prior to Board approval of the waiver application for submission, it will be critical to ensure the stakeholder engagement process is robust. Webinars for educators and direct feedback from stakeholder groups and committees (AOC and Indian Education Committee) is essential.

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**BOARD ACTION**

I move to accept the Idaho State Department of Education's Draft Waiver Application, as provided in Attachment 1, and to authorize the Department to use the draft to negotiate with the U.S. Department of Education.

Moved by \_\_\_\_\_ Seconded by \_\_\_\_\_ Carried Yes \_\_\_\_\_ No \_\_\_\_\_



## Idaho Waiver Request Background and Process

### Background:

Over the past ten months, the U.S. Department of Education (ED) has indicated a willingness to shift the balance of authority and oversight of K-12 education toward the states. ED has encouraged states to pursue options designed to “free [schools] from bureaucratic red tape” through established processes such as ESEA waivers and Ed-Flex state status applications. These processes allow states to better identify and meet local student and school needs in an effort to improve K-12 achievement.

Since April 2025, the Idaho Department of Education (the Department) has acknowledged this change of approach at the federal level and has been exploring ways to improve how the Every Student Succeeds Act (ESSA), the reauthorized version of the Elementary and Secondary Education Act (ESEA) of 1965, is administered.

The Department began its efforts during its Post-Legislative Tour in April and May, asking administrators about their ideas around federal requirements in funding, accountability, and assessment. The Department updated the State Board of Education on its objectives during the June 2025 and December 2025 meetings.

In fall 2025, the Department convened a Federal Flexibility Work Group to explore these options. This group includes administrators, federal program directors, assessment coordinators, and business managers who are exploring which options make the most sense for Idaho. As part of this process the Department is also reviewing all federal program reporting and spending requirements directly administered by the State to remove anything not explicitly required by federal law. The work group met from August to November and has assisted in developing three initial recommendations, including:

- Spending and reporting flexibility in State administration for Title and IDEA programming
- Assessment waivers for third grade ISAT ELA and eleventh grade ELA and math ISAT
- Application for Ed-Flex state status

These draft recommendations were out for public comment from mid-November 2025 through January 2026.

### Process:

The Idaho Department of Education is developing a waiver which will include two proposals related to assessment requirements outlined in the Elementary and Secondary Education Act (ESEA) as reauthorized by the Every Student Succeeds Act (ESSA). ESEA waivers are granted by the U.S. Secretary of Education to state education agencies (SEAs) through a process outlined in ESEA Section 8104(a)(2). Waivers are intended to allow SEAs to seek flexibility from specific ESEA statutory and regulatory requirements in order to “advance student academic achievement.” A state seeking a waiver must provide ample opportunity for public feedback prior to submitting an application to the Secretary of Education for approval. The waiver application must include the following:

Debbie Critchfield, Superintendent of Public Instruction

**(208) 332-6800 | 650 W. State St., Boise, ID 83702 | [sde.idaho.gov](http://sde.idaho.gov)**

PPGA

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- Identification of the statutory or regulatory requirements to be waived;
- A description of how the waiver will improve student academic achievement;
- A description of the methods to be used to regularly monitor and evaluate the effectiveness of the plan;
- A description of how schools will continue to serve subgroups of students; and
- If requirements for assessments or report cards are waived, a description of how the state or district will maintain or improve reporting to the public and parents on student achievement and school performance.

Once a waiver application is submitted, the U.S. Department of Education (ED) has 120 days to review it and issue its decision. Based on prior experiences with Idaho's Consolidated State Plan and ongoing communications with ED, the Department intends to provide ED staff with draft waiver language for their feedback prior to formally submitting the waiver application. Once the Department has received feedback from ED, the final proposed waiver application will be brought to the Board for approval.



## Idaho ESEA Waiver Draft Application

### **Proposal 1: Assessment Waiver for Grade 3 ELA Achievement Testing**

#### **Summary:**

Idaho is one of only a handful of states that tracks both literacy growth and achievement for students in kindergarten through third grade through administration of a statewide early literacy assessment. Idaho has a longstanding commitment to ensuring our students become effective readers by third grade. Through our Early Literacy Initiative, state law has required K-3 students to take the Idaho Reading Indicator (IRI) since 1999. Due to testing to address the federal requirement for standards-aligned assessments of core subjects, Idaho's third grade students take two high-stakes reading and English Language Arts (ELA) assessments: the IRI and the Idaho Standards Achievement Test (ISAT) ELA. This waiver application proposes the following spring assessment requirements for grade three: ISAT Mathematics and the IRI assessment.

The IRI is a norm-referenced early literacy assessment designed to evaluate the following foundational reading skills in alignment to the science of reading: phonics, phonemic awareness, fluency, vocabulary, and reading comprehension. The IRI informs instruction and interventions to improve literacy outcomes. The fall administration data is used as the state's universal screener to help educators identify students who may have characteristics of dyslexia and those who need additional support to develop strong reading skills. Idaho's Early Literacy Initiative is backed by a \$73 million state literacy intervention funding allocation that is distributed to districts and public charter schools. Half of the funding formula for the literacy intervention funds is based on growth and achievement on the IRI.

Last year, Idaho contracted with Amira Learning on an updated Idaho Reading Indicator to replace the iStation assessment, which had been in place since the 2017-2018 school year. The new assessment by Amira is more rigorous than previous test versions, offering a more complex evaluation of students' reading abilities. The assessment no longer relies on multiple-choice questions, instead asking students to respond in ways that are more constructive and applied, calling on deeper learning and more advanced test-taking skills.

The Idaho State Department of Education (Department) is working with Amira on the development of a continuous scale and cut scores for criterion-referenced scores for use in Fall 2026 and ongoing. Our aim in this process is to expand the IRI to meet the needs of Idaho students, families, state policymakers, and educators. This waiver includes request for exemptions from ESEA requirements related to standards-based assessment and peer review, as outlined below. We request that our Grade 3 assessment waiver provisions be in place beginning with the 2026-27 school year.

Debbie Critchfield, Superintendent of Public Instruction

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**Outline of Proposal 1:**

- **Identify the statutory or regulatory requirements to be waived:** Beginning with the 2026-27 school year, we request the following sections of the Elementary and Secondary Education Act (ESEA) be waived for the state of Idaho: Title I, Part A, Section 1111 (c)(4)(B); Title I, Part A, Section 1111(b)(2)(B)(iii).
- **Describe how the waiver will improve student academic achievement:** Grade three is a transitional year for readers, as they shift from building foundational reading skills to demonstrating their ability to apply those skills through deep comprehension, research, and writing. The emphasis on one assessment, as opposed to both the ISAT and IRI, will allow for additional instructional time and reduce the amount of time testing of the same/similar standards.
- **Describe the methods to be used to regularly monitor and evaluate the effectiveness of the plan:** In addition to the current data reviews conducted annually to meet ESEA School Identification requirements, the effectiveness of the plan will be reviewed by our Federal Programs/School Improvement team, the Accountability Oversight Committee, and the Idaho State Board of Education. The review will include student group, grade level, school, district, and statewide data. Areas of emphasis for the reviews will be aligned to the State Board of Education's and State Department of Education's strategic plans and will be informed by prior year's data. Our annual reviews will include a close look at the ISAT ELA data for grades four and five to determine if there are shifts or unexpected consequences due to the reduction of content previously assessed through the ISAT ELA. To the extent possible, we will review sub-category (domain or claim) data for grades three, four, and five to further understand the impacts of the change.
- **Describe how schools will continue to serve subgroups of students:** The requirements for IRI testing are virtually the same as for the ISAT. The IRI is administered to students in kindergarten through grade 3; all students are expected to participate in both fall and spring IRI testing. The only exception is for English Learners. Per Idaho Code Section 33-1618, students who have not been enrolled in an elementary school in the United States for two full years and who score below a 2.0 on the English Language Proficiency Assessment are exempted from taking the IRI. This waiver request related to this exemption is addressed in Proposal 3: Waiver to Extend English Learner Exemptions, below. The adaptive nature of the test allows students with IEPs to demonstrate skills at their level. Since the IRI is administered in kindergarten through third grade, it supports early identification of reading challenges allowing educators to provide interventions based on the needs of their students.
- **If requirements for assessments or report cards are waived, describe how the state or district will maintain or improve reporting to the public and parents on student achievement and school performance:** For the grade three assessment, we are not requesting a waiver of report card requirements. The IRI statewide, district, school, and grade level results are included in the reporting on the Idaho Report Card website and will continue to be included to provide academic transparency for the public and parents. Currently, data is posted and broken out for all grades tested and the various subgroups. The report card provides additional information to help users understand the data presented.

**Proposal 2: Assessment Waiver for Grade 11 ELA and Math ISAT****Summary:**

Last year, the State Board of Education adopted (and the Idaho Legislature approved) new graduation requirements for high school students. A component of the new requirements that will be in place for school year 2026-2027 is localized pathways. Localized pathways are defined as a “framework of locally provided offerings that identifies core and elective credits, assessments, and other opportunities aligned to various post-secondary goals.” Local education agencies will be required to develop and post publicly two or more localized pathways, though completion will not be a requirement for graduation.

Examples of localized pathways could include:

- 2-year or 4-year college and university readiness
- Military readiness
- Apprenticeships
- Direct entry into a trade or career
- Exploration of post-secondary opportunities

To improve alignment to locally developed graduation pathways and support Idaho’s high school students in identifying and pursuing their post-secondary goals, we propose student-selected assessment for eleventh grade. Students will choose from an approved list of assessments aligned with graduation pathways and/or post-secondary goals, to be provided by the Idaho State Board of Education.

The assessments the State Board of Education could consider for eleventh grade include, but are not limited to, the following:

- ISAT (as a college entrance exam)
- SAT
- ACT
- Classic Learning Test (CLT)
- Idaho CTE Technical Skills Assessment (TSA) and Workforce Readiness Assessment (WRA)
- ASVAB

The ISAT Math and ISAT ELA for eleventh grade will be the default assessment required by the State. Students on pathways better aligned to another assessment would work with their counselor to select a different assessment from the State Board-approved list and the local education agency would report the student’s ISAT opt-out choice.

In order to meet the needs of Idaho students and families, Idaho requests a waiver to shift our high school testing from a single assessment (ISAT) to a system that allows eleventh grade students to select their assessments from a State Board-approved list. This waiver includes requests for exemptions from ESEA requirements related to standards-based assessment and peer review, as outlined below. We request that our high school assessment waiver provisions be in place beginning with the 2027-28 school year.

**Outline of Proposal 2:**

- **Identify the statutory or regulatory requirements to be waived:** Beginning with the 2027-28 school year, we request the following sections of the Elementary and Secondary Education Act (ESEA) be waived for the state of Idaho: Title I, Part A, Section 1111 (b)(2)(B)(iii);Title I, Part A, Section 1111 (c)(4)(B), Title I, Part A, Section 1111 (h).
- **Describe how the waiver will improve student academic achievement:** Allowing students to choose an assessment aligned to their goals will help with their “buy in” incentivizing students to perform their best on the assessment. Currently, the ISAT is given to all eleventh-grade students, and for many, it is not taken seriously because it does not have an impact on their future plans. Per State Board of Education Policy, the ISAT by Smarter Balanced is used for direct admissions and course placement for our Idaho public universities and community colleges, making it an excellent option for students planning to pursue academic programs at our institutions. However, for students in other pathways, such as career technical education (CTE) and military preparation, this ISAT policy is not as beneficial. Idaho’s CTE program has two state-created, CTE standards aligned assessments currently in use, and students in ROTC commonly prepare for the ASVAB. Students pursuing these postsecondary plans are currently taking multiple tests. Our proposed change will provide a more accurate reflection of all students’ knowledge and skills, with improved alignment to the coursework choices students are making. Additionally, we anticipate that the stronger tie to their post-secondary pathways will encourage students to put in more effort to understand the content of their anticipated assessment.
- **Describe the methods to be used to regularly monitor and evaluate the effectiveness of the plan:** Similar to the third grade IRI request, Idaho will use the current data reviews conducted annually to meet ESSA School Identification requirements. The effectiveness of the plan will be reviewed by our Federal Programs/School Improvement team, the Accountability Oversight Committee and the Idaho State Board of Education. Additional groups such as Idaho Workforce Development Council and the Division of Career Technical Education may be included to determine if the assessments meet the anticipated needs and provide the data/information needed for accountability. The review of available data will include student group, grade level, school, district, and statewide data. Areas of emphasis for the reviews will be identifying gaps and changes and determining whether there is information missing by not requiring the ISAT for all eleventh-grade students. Additionally, there will be a review of the alignment between students’ pathways plans, the assessment taken, and students’ post-secondary progress. The process of gathering new data and evaluating the effectiveness of the proposed change to high school testing will require time. As shown in the table on the following page, our evaluation plan is a scale up approach, based on anticipated data availability. We plan to develop a mechanism to look at students’ testing choices and their post-secondary decisions, but anticipate the development of that research methodology and data infrastructure will take some time.

Please note that the metrics included in this table are intended to demonstrate an example of the data reporting and evaluation plan we will develop after the Board approves assessments for inclusion on the 11<sup>th</sup> Grade Assessment Options List.

School Year	Data to Review	Notes
2028-29	<ul style="list-style-type: none"> <li>2027-28 11<sup>th</sup> grade student participation and performance on the following metrics: ISAT ELA, ISAT Math, Idaho CTE TSA and Idaho CTE WRA</li> </ul>	Idaho already has data infrastructure for ISAT and will work with our Division of CTE to determine the timeline for supporting integration of the CTE TSA and CTE WRA.
2029-30	<ul style="list-style-type: none"> <li>2028-29 11<sup>th</sup> grade student participation and performance on the following metrics: ISAT ELA, ISAT Math, Idaho CTE TSA, Idaho CTE WRA, SAT, and ACT</li> </ul>	The timing of incorporating SAT, ACT, and other assessment data will be dependent on establishing data sharing agreements with adequate time for data infrastructure to be updated prior to a given school year. The data will be incorporated as soon as is possible.
2030-31	<ul style="list-style-type: none"> <li>2029-30 11<sup>th</sup> grade student participation and performance on the following metrics: ISAT ELA, ISAT Math, Idaho CTE TSA, Idaho CTE WRA, SAT, and ACT</li> <li>Postsecondary Go On Rates (fall immediate and 1 year) for the Class of 2029, in comparison to prior cohorts</li> <li>First year performance in introductory coursework</li> </ul>	If the federal government begins giving states access to ASVAB data, it will be added within 1 year of finalizing the data sharing agreement.

- Describe how schools will continue to serve subgroups of students:** Currently all eleventh-grade students are expected to take the ISAT or the ISAT alternative. With the proposed change, all students will still be expected to take an assessment, so all subgroups will continue to be served. By increasing the choice in assessments, families will be able to determine the best option for their students and be more directly involved and supportive of the assessments. For students who are uncertain what path they will follow, the eleventh grade ISAT will still be an option. Additionally, for students on IEPs, their IEP team can help determine the most meaningful assessment for that student and include it in the transition plan.
- If requirements for assessments or report cards are waived, describe how the state or district will maintain or improve reporting to the public and parents on student achievement and school performance:** Idaho's waiver request does include the report card requirements for our high school assessment data. In the initial years of implementation, we will work to get appropriate data sharing agreements and contracts in place and develop the data infrastructure needed to gather and use data for all assessments options being given to students. Over time and to the extent possible, Idaho will work with our Report Card vendor to include data on the various assessments. We anticipate the timeline for releasing the data will align with our evaluation plan as outlined above – the years when we are able to add metrics to our project evaluation will be the same years we can incorporate the data into our state, district, and school report cards. The earliest we will be able to incorporate postsecondary go on data is SY 2030-31. In the years when we cannot incorporate all of data from our assessments into the report cards, we will provide guidance to districts and schools regarding actions they should take to ensure students and parents have access to their applicable assessment results.

### **Proposal 3: Waiver to Extend English Learner Exemptions**

#### **Summary:**

In 2024, the Idaho Legislature passed House Bill 566, creating Idaho Code Section 33-1618 that provides a two-year exemption for English Learners, who are newly enrolled in an elementary school and who score below a 2.0 on the state English language proficiency assessment, from participation in the Idaho Reading Indicator (IRI). To support ease of implementation, the state automatically exempts students who qualify for the exemption, thus removing the data from our reporting. Similarly, the exemption is automatically applied for the second year for students who qualify. If a school prefers a student take the test in either of their allowed exemption years, they may opt the student out of the exemption.

Feedback surrounding the new IRI EL exemption policy has been positive, with districts and schools indicating that it relieves pressure for students who are already required to take another assessment related to ELA content – the English Language Proficiency Assessment (ELPA). As a result of this feedback, the state has begun to receive inquiries about having a similar exemption for the Idaho Standards Achievement Test (ISAT) in both ELA and Mathematics.

The Idaho State Board of Education's Accountability Oversight Committee (AOC) recently reviewed English Learner data and recommended that the Board and Department request a waiver to allow English Learners to be exempted from the ISAT ELA and ISAT Math for two years rather than one. Additionally, the AOC recommends that the two year IRI exemption remain in place for third grade students if our waiver request to use the Grade 3 Spring IRI in lieu of the ISAT ELA is approved.

In order to meet the needs of Idaho students and families by allowing our newest English Learners to focus on their language acquisition, Idaho requests a waiver for English Learners to be exempted from achievement testing in both English Language Arts (ISAT ELA) and Mathematics (ISAT Math) for two years rather than the one year allowed under ESEA. We intend to use the same process as used for our state-required IRI exemptions. We request that English Learner Exemption waiver provisions be in place beginning with the 2026-27 school year.

#### **Outline of Proposal 3:**

- **Identify the statutory or regulatory requirements to be waived:** Beginning with the 2026-27 school year, we request the following sections of the Elementary and Secondary Education Act (ESEA) be waived for the state of Idaho: Title I, Part A, Section 1111 (b)(3).
- **Describe how the waiver will improve student academic achievement:** Allowing our newest English Learners to be exempt from ELA and Mathematics achievement testing will ensure that the students newest to our language have the opportunity to focus on developing their English skills prior to taking high-stakes tests that require a level of English skill that students have typically not gained. This approach is backed by research that shows that developing strong literacy skills, including speaking, listening, and reading in one's native language before or alongside a second language taught at slower pace is more effective in ensuring long-term ELA and literacy skills. All English Learners will be expected to take the ELPA.
- **Describe the methods to be used to regularly monitor and evaluate the effectiveness of the plan:** To ensure this change is appropriate and effective, Idaho will review both our ELPA and available ISAT ELA and Math data for English Learners. While this waiver will allow one

additional exemption year for ELs in regard to the ISAT, we will still have subsequent years of ISAT data for the vast majority of ELs. We will compare EL performance data on both the IRI and ISAT assessments from before and after the implementation of this change to ensure there is no negative impact on EL performance.

- **Describe how schools will continue to serve subgroups of students:** This waiver request applies only to English Learners, who will continue to receive support through our English Learner programs and who will continue to take the ELPA when exempted from the ISAT. All other students will be required to participate in all applicable assessments.
- **If requirements for assessments or report cards are waived, describe how the state or district will maintain or improve reporting to the public and parents on student achievement and school performance:** For English Learner assessments, we are not requesting a waiver of report card requirements. The ELPA and ISAT results are included in the reporting on the Idaho Report Card website and will continue to be included to provide academic transparency for the public and parents. The only change will be which EL students are required to take the achievement tests (IRI for grade three, and ISAT ELA and Math for grades four through eight).



## **Idaho Waiver Request Public Comment Summary**

### **Background:**

Over the past ten months, the U.S. Department of Education (ED) has indicated a willingness to shift the balance of authority and oversight of K-12 education toward the states. ED has encouraged states to pursue options designed to “free [schools] from bureaucratic red tape” through established processes such as ESEA waivers and Ed-Flex state status applications. These processes allow states to better identify and meet local student and school needs in an effort to improve K-12 achievement.

Since April 2025, the Idaho Department of Education (the Department) has acknowledged this change of approach at the federal level and has been exploring ways to improve how the Every Student Succeeds Act (ESSA), the reauthorized version of the Elementary and Secondary Education Act (ESEA) of 1965, is administered.

The Department began its efforts during its Post-Legislative Tour in April and May, asking administrators about their ideas around federal requirements in funding, accountability, and assessment. The Department updated the State Board of Education on its objectives during the June 2025 and December 2025 meetings.

In fall 2025, the Department convened a Federal Flexibility Work Group to explore these options. This group includes administrators, federal program directors, assessment coordinators, and business managers who are exploring which options make the most sense for Idaho. As part of this process the Department is also reviewing all federal program reporting and spending requirements directly administered by the State to remove anything not explicitly required by federal law. The work group met from August to November and has assisted in developing three initial recommendations, including:

- Spending and reporting flexibility in State administration for Title and IDEA programming
- Assessment waivers for third grade ISAT ELA and eleventh grade ELA and math ISAT
- Application for Ed-Flex state status

These draft recommendations were out for public comment from mid-November 2025 through January 2026.

### **Summary of Public Comments:**

The Department solicited public comment on the three recommendations from November 14, 2025, to February 2, 2026 (11-weeks).

The Department received 45 comments from 47 respondents representing traditional public schools, public charter schools, virtual schools, classroom teachers, parents, and higher education. Additionally, comments were submitted from individuals in each of Idaho’s six educational regions.

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**Spending and Reporting Flexibility in State Administration for Title and IDEA Programming**

The feedback received regarding this recommendation was overwhelmingly positive, with more than 30 of the 46 responses supporting increased spending and greater reporting flexibility for Title and IDEA programming.

Multiple respondents shared that current reporting requirements are onerous, especially for small and mid-sized districts where administrative time directly impacts the quality of support provided to students.

**Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT**

The feedback received regarding this recommendation was overwhelmingly positive, with more than 30 of the 46 responses supporting eliminating the 3<sup>rd</sup> Grade ISAT and replacing the single high school achievement test with a list of options for a student-selected assessment in the 11<sup>th</sup> Grade.

Multiple respondents shared that testing fatigue, especially in 3rd grade, is an issue for their students and noted that 3rd grade is the most heavily tested grade level in K-12 for state testing.

Comments for replacing the single high school achievement test were overwhelmingly positive, with multiple respondents sharing that a student-selected assessment aligned to multiple pathways and student goals restores instructional value to the 11th-grade assessment.

**Ed Flex State Status**

The feedback received regarding this recommendation was generally positive with a majority of the comments focused on the benefits of greater flexibility and control at the state and local levels.



## Idaho Waiver Request Public Comments

November 14, 2025 – February 2, 2026

### 1. [REDACTED] Post Falls School District #273

#### *Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I would like to express my strong support for the Idaho Department of Education's proposed efforts to reduce unnecessary administrative burden on local educational agencies and to increase spending flexibility within federal programs. The environment in which our schools operate is constantly evolving, and the needs of our students continue to become more diverse and more complex. To respond effectively, districts must be able to adapt quickly rather than be slowed by requirements that extend beyond what federal law actually mandates.

By streamlining processes and removing excess layers of compliance, the Department empowers districts to devote more time and resources toward what matters most: meeting student needs. Increased flexibility allows LEAs to make timely, locally informed decisions that reflect the realities of their communities. This is essential in a school landscape where instructional strategies, student supports, and operational demands can shift rapidly.

These proposed changes will help ensure that federal programs function as tools for responsiveness—not barriers to it. I appreciate the Department's commitment to examining its own requirements and identifying opportunities to better support Idaho's educators and students.

#### *Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I strongly support the Idaho Department of Education's proposal to replace the Third Grade ELA ISAT with the existing Idaho Reading Indicator (IRI) and to replace the 11th Grade ISAT with a student- or LEA-selected assessment aligned to graduation pathways and post-secondary goals.

The ISAT has long been a cumbersome assessment that provides little meaningful instructional insight for teachers or students. Its design and reporting do not translate into actionable information that can help educators adjust instruction in ways that genuinely support learning.

**Debbie Critchfield, Superintendent of Public Instruction**

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For third graders in particular, administering both the ISAT and the IRI is redundant and burdensome—especially when the IRI, in its updated form, already offers teachers far more targeted and useful data. The IRI allows educators to identify specific skill gaps and strengths, enabling timely adjustments to instruction that better serve young learners.

Similarly, giving high school students the opportunity to take assessments aligned with their academic or career pathways is a much more purposeful approach. It ensures that testing is relevant, meaningful, and supportive of students' individual post-secondary goals rather than being an exercise in compliance.

This proposal moves Idaho toward a more responsive, student-centered assessment system—one that respects instructional time, recognizes local needs, and prioritizes assessments that genuinely inform teaching and learning. I commend the Department for taking steps that better align our statewide testing practices with what students and educators actually need.

*Draft Recommendation 3: Ed Flex State Status*

I am fully supportive of Idaho applying for Ed-Flex state status. Our local educational agencies need greater flexibility in designing and implementing programs that truly reflect the needs of their students and communities. Expanded options such as schoolwide eligibility, increased carryover, program streamlining, and blending funding sources will allow districts to use federal resources more strategically and responsively. Granting LEAs this level of autonomy will strengthen their ability to serve students effectively and efficiently.

*Additional Comments:*

Thank you to the Idaho Department of Education for seeking input on reducing federal requirements and updating federally required tests. I appreciate the Department's commitment to listening to educators and districts and for taking proactive steps to ensure our systems are more responsive, efficient, and supportive of students' needs. I am also grateful for the effort to eliminate unnecessary federal reporting, which will allow schools to focus more time and resources directly on students.

2. [REDACTED] *Pocatello Chubbuck School District #25*

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Streamlining both the application and monitoring process would alleviate a significant amount of workload for Federal Programs/Title I Directors.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

The recommendation for eliminating the ISAT in 3rd and 11th grade are excellent! Third graders experience far too many assessment platforms at such a young age, and our 11th graders are not as invested in the ISAT outcomes as other assessments that directly relate to college applications.

*Draft Recommendation 3: Ed Flex State Status*

I think flexibility can be helpful when working with federal grants; however, if the guidance on the waiver is unclear or inconsistent, it can cause more confusion and frustration.

*Additional Comments:*

Our Federal Programs Director and Coordinators work so diligently to support our LEAs! Be sure to thank them!

3. [REDACTED] **Pocatello Chubbuck School District #25**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No Comment

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Do not change the 3rd grade ISAT to the IRI. I am a school principal of the top Idaho school, Edahow Elementary. Amira is an unreliable testing platform that lacks rigor. Teachers do not like nor do they find it to be a good assessment. ISAT is a good test that is more rigorous and valuable. It will prepare them for the future. We should be finding ways to better assess kids in a more rigorous way. Changing 3rd grade ISAT to the IRI would do the opposite.

*Second Submission:* I have submitted a comment on Recommendation 2 letting them know that changing 3rd grade ELA ISAT to IRI would be a poor decision for Idaho learners. However, due to the shock of how upset I was about this proposal, my thoughts were not very well written.

The current IRI is not a reliable or accurate assessment of a learner's skills or knowledge of content standards. The current ISAT is a much more robust and rigorous assessment. When the IRI was administered through Istation, it was not viewed by the teachers as a reliable and usable assessment. The random ups and downs of the assessment scores baffled teachers to the point where they shrugged and hoped for the best each month. This year's Amira platform IRI is new, so the jury is still out, but it has failed to gain the respect of my teachers at this point in time due to reliability and technology issues, as well as questionable accuracy results.

We've seen top readers score very low, which can happen from time to time, but teachers are questioning the audio reliability in relation to actual scores. I also personally witnessed a student who does not speak English or Spanish (or any language) take the test, make some sounds with his mouth, and score higher than some of the top readers in the class.

The ISAT has been a reliable assessment of student knowledge of content standards, so I question replacing it with one that has not proven itself in the eyes of teachers and schools.

For these reasons, I submitted comments in opposition to Recommendation 2.

*Draft Recommendation 3: Ed Flex State Status*

No Comment

*Additional Comments:*

No Comment

**4. [REDACTED] Boise**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No Comment

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I support removing the ELA ISAT requirement for 3rd grade students. They are being tested already with the IRI, and the ISAT causes them more unnecessary stress!

*Draft Recommendation 3: Ed Flex State Status*

No Comment

*Additional Comments:*

No Comment

**5. [REDACTED] Boise**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

appreciate the Department's goal of reducing unnecessary administrative burdens and improving the usability of federal programs at the state and local level. Streamlining processes can free schools to focus more directly on student learning.

However, I am concerned that increased flexibility within Title programs—particularly Title I, II, and IV—could unintentionally weaken supports for students who have historically faced

barriers to academic success. Title programs play a critical role in promoting equity, inclusion, and access. Loosening reporting or spending requirements could reduce the visibility of achievement gaps, limit accountability, or allow resources to shift away from the students and communities who rely on them most.

I encourage the Department to ensure that any administrative flexibility includes strong guardrails, transparent reporting, and clear expectations for maintaining or expanding supports for underserved and marginalized student groups. Flexibility should never come at the cost of equity.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I support efforts to reduce the volume of standardized testing in Idaho schools. Excessive testing often forces teachers to narrow instruction and emphasize test-taking strategies rather than fostering curiosity, creativity, and a genuine love of learning. Reducing the testing burden, especially for younger students, will give teachers more flexibility to meet students where they are and cultivate the habits of lifelong learners.

Replacing the 3rd Grade ISAT with the existing IRI is a sensible step toward minimizing redundant assessments. I also appreciate the proposal to allow 11th graders to choose assessments aligned with their college or career pathways. This approach respects student individuality and may better reflect a young person's goals.

That said, I encourage the Department to ensure that these changes do not inadvertently reduce data transparency or the ability to monitor outcomes for student groups who have historically been underserved. The state should commit to maintaining accessible, disaggregated data—even under a more flexible assessment model—to ensure equity remains a central priority.

*Draft Recommendation 3: Ed Flex State Status*

I understand the appeal of Ed-Flex status, especially in allowing local agencies more autonomy in designing programs that meet the needs of their communities. Local control can be a powerful tool when paired with accountability and clear expectations.

At the same time, I am concerned that broad flexibility could open the door to weakening initiatives related to diversity, inclusion, and equitable access. In the current policy environment, it is important to ensure that federal funds continue to support all students—particularly those who have been historically marginalized. Flexibility should not allow resources to be diverted in ways that widen disparities or disproportionately benefit already advantaged communities.

If Idaho pursues Ed-Flex status, I urge the Department to establish a transparent statewide framework with strong monitoring, measurable equity safeguards, and clear requirements for protecting the student groups prioritized under ESSA. Public visibility and accountability must remain central components of any waiver process.

*Additional Comments:*

Across all three recommendations, I strongly encourage the Department to continue engaging the public—families, educators, students, and community members—in open, ongoing dialogue. These decisions will shape Idaho's educational landscape for years to come, and sustained community involvement will help ensure that the final approach reflects Idaho's diverse values and needs.

Thank you for the opportunity to comment and for your continued work on behalf of Idaho students.

**6. [REDACTED] Snake River School District #52**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Decrease the red tape and the shear volume of reporting required for title 1-C. I believe they are onerous for the districts. I think the local liaison should be able to conduct the education of migrants and their needs without having to complete a CNA. I also feel that one PAC meeting per year should suffice, unless the local liaison desires to have more. I also feel that there is too much emphasis on college and not enough on career readiness or even life readiness. I feel that many of the title programs are focused on equity rather than equality. I feel that title budgets have too many constraints on spending timelines. Sometimes districts need less and sometimes more and the money not used should be put into an account for each district.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I feel that 8th grade should be the last grade to take the ISAT. High school provides DE classes in both ELA and Math.

*Draft Recommendation 3: Ed Flex State Status*

More flexibility is always good as long as the state allows more flexibility for the local districts.

*Additional Comments:*

Less frequent auditing visits.

## 7. [REDACTED] Nampa

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Support

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Strongly Agree

*Draft Recommendation 3: Ed Flex State Status*

I hope it means more support for the our students and schools.

*Additional Comments:*

As Idahoan's we should all want the best for our future and our future IS our children. This state needs to step up and not protect some families and some students, but all students, no matter their SES or background. Public Education is a corner stone of this country. Let's make it easier without all the red tape to support Public Education, I hope these Draft Recommendations will do that. The next step would be to help schools with our ever increasing, special education students. This population is growing exponentially, and we need support and funding to hire more special education. The burden on schools, staff and other students is becoming too much.

## 8. [REDACTED] Mountain View School District #244

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

What kind of educational professionals are you?! My answer is the same for each of your foolish suggestions. It is clear the Department of Education is being dismantled at the Federal Level. What you are suggesting here is simply a "kiss of the ring" and way to get out of fully funding public education. Our children and students across Idaho count on us, as educational professionals to provide ACCURATE instructional materials, deliver these materials in a professional educated manner and provide appropriate assessments. Appropriate testing should demonstrate a spiral up in the students' learning and if not, what is necessary for remediation. Why would we allow a disservice to our students and the opportunities that come with a high standard of education. You should be ashamed of yourselves for attempting to pull a stunt like this. You have already approved lying, low quality educational religious based programs as a fall back for Idaho teachers. Maybe it's time you found a new job.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Read #1 Recommendation Comment

*Draft Recommendation 3: Ed Flex State Status*

Read #1 Recommendation

*Additional Comments:*

If you choose to not care about Idaho's public schools and children, please get another job. Recognize that the current Federal Department of Ed is being dismantled under the Trump administered by a person with no background in Education. As soon as the Trump and Maga leave Washington D.C. this will change. PLEASE, do not be stupid enough to follow suit on the foolishness and disrupt our current status. UNLESS, you actually want to fully fund Idaho Public Schools.

**9. [REDACTED] Grangeville**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I see the need for revision to better align ourselves to receive title funds for our schools, especially schools like mine that are in poor districts. I do not agree with reducing any recommendations from the national government.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I agree that we should not have 3rd grade ISATS and 11th grade ISATS.

*Draft Recommendation 3: Ed Flex State Status*

I dont not agree with reducing any title recommendations or procedures, for some of the poorest schools title funds help keep programs going that are absolutely needed. Please make sure we are able to receive title funds!

*Additional Comments:*

I agree that students in high school should be able to follow a path; however, they should still have access to math and English as sometimes students do not really know what they really want until they graduate.

**10. [REDACTED] Mountain View School District #244***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

It appears the review of this section is adequate. Omit redundancies and streamline to match federal regulations.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

There is too much testing. In both reading and math, it is understandable to use testing for placement and benchmark for growth, however that should not be the only marker. Many students are horrible at taking tests, but do great in the classroom, and that should be taken into account. Also, unless a test is being used to show growth, NO testing should be required for graduation! Completion of credits and class requirements set by each individual board should be the only marker for graduation, but standardized testing should never be utilized for graduation considering how many students learn, or their ability to test.

*Draft Recommendation 3: Ed Flex State Status*

I think it would be good for Idaho to be an Ed-Flex state as districts need to have the flexibility to opt out of certain programs where they are not affected and be able to utilize funds in another area where they are grossly under funded. But some power needs to be given to the districts, of course with budgetary plans in place for the use of those funds.

*Additional Comments:*

As a whole, there needs to be more federal funding granted to smaller school districts that are struggling. Many small districts are unable to get levy's to pass, because they have been successful without in the past due to federal logging dollars. Now that those funds are gone, smaller school districts are struggling and will have to eliminate vital electives, including sports. The state should be evaluating this and helping.

**11. [REDACTED] Wendell School District #232***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I strongly support this recommendation and appreciate the Idaho Department of Education's efforts to reduce unnecessary burdens on LEAs while remaining aligned with federal law. These four steps offer practical ways to strengthen program integrity and increase district flexibility. Updating key guidance documents is a critical first step; clear and accurate information helps LEAs make informed decisions and fully utilize federal program flexibilities. Similarly, reviewing the CFSGA to remove overly restrictive requirements will free districts to focus more on

students and less on administrative tasks. Ensuring that state processes align directly with federal expectations will be much more efficient.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Aligning assessments with Idaho's priorities strengthens our system and ensures assessments provide meaningful value to students, educators, and families. Replacing the 3rd-grade ELA ISAT with the already-established Idaho Reading Indicator creates a more streamlined and developmentally appropriate measure of early literacy, reinforcing one of the state's highest academic priorities. This change not only simplifies the assessment process but also allows for a more focused evaluation of foundational literacy skills, which are crucial for future academic success. By utilizing a tool already in place and known for its effectiveness, we can ensure that assessments are efficient, accurate, and directly support Idaho's educational goals.

*Draft Recommendation 3: Ed Flex State Status*

Allowing 11th graders to take assessments aligned with their individualized post-secondary pathways would be a valuable improvement for Idaho students. This approach would honor student choice, support updated graduation requirements and student pathways. Offering options such as the ACT, SAT, ASVAB, or continued ISAT participation would provide meaningful flexibility for districts and students, aligning with their individual goals.

*Additional Comments:*

No Comment

**12. [REDACTED] Post Falls School District #273**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

We would appreciate spending flexibility. We are currently over burdened with reporting requirements etc.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Please remove the third grade ISAT requirement. The ISAT is an incredibly long test and does not provide any timely information to inform instruction at any grade level.

*Draft Recommendation 3: Ed Flex State Status*

We support applying for Ed-Flex status as long as it does not increase reporting/compliance. We are already spending way too much time creating reports with information that is readily available in ISEE.

*Additional Comments:*

The consultation requirements with private schools are often time consuming and cumbersome.

**13. [REDACTED] Idaho Falls***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Boise is one of the most powerful state education departments in the nation, having removed nearly all autonomy from public school districts over the past half decade and punitively punishing districts that seek to have any freedom to think local so I find this as an additional power grab by big government seeking to control local authority. This just feels like more one-size-fits-all mandates that strips power away from the local level and gives it to Boise.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

This seems to reward private and home schoolers and generally removes accountability, how is that a good thing? Lowering standards while punishing public schools doesn't sound like good leadership. Idaho is already near the bottom of the nation when it comes to graduation rates, post-high school education and test scores, I don't see how this helps.

Waivers are a cop-out for education departments that cater to low standards or those with outrageous demands that their children can't possibly learn something that might challenge their world view.

*Draft Recommendation 3: Ed Flex State Status*

Less regulation when it comes to some things is nice, education is not one of them. Every year, time and again, shows that states that have less regulation have worse results. This is measurable. The only reason this is still pushed is because less regulation means more money can be funneled to certain connected private schools, away from public schools (especially those outside wealthy neighborhoods, see Title I Part A & C) while lowering the quality of teachers (Title II Part A and Title IV Part A). The only reason states lower the standards for teachers is to allow unqualified teachers to indoctrinate out children by rewriting history and science which only leads to failure down the road, but it does make donors and a few powerful parents happy.

*Additional Comments:*

I don't see how more power away from the local level being focused in Boise, less accountability and worse teachers and standards will help the children of Idaho. I get it, regulation can be restricting but in this case removing it just leads to lower quality schools, a

worse future for our children and a rude awaking for the state in the long run. This is performative for the sake of out-of-state money and super PACs that are pressuring law makers to be like other states. I want Idaho to be Idaho, not Florida, Indiana or Texas. Don't let our children suffer so politicians can win brownie points with dark money donors from out of state.

**14. [REDACTED] The Pocatello Community Charter School, Inc. #494**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Rewriting/removing additional burdens at the state level would be great. I wish the SDE/SBOE/legislature would get rid of the red tape created at the state level like the CIP and teacher evaluation regulations.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Yes, we should replace the 3rd grade isat with the iri and the 11th grade isat with whatever test they want to take.

*Draft Recommendation 3: Ed Flex State Status*

Yes. Idaho should supply for the edflex waiver to allow as much flexibility as possible.

*Additional Comments:*

As long as we are still stuck giving the isat, the state should live up to "making all stakeholders accountable" by requiring schools to give parents a report card based upon attendance, homework completion, and discipline at a minimum. If students are behind academically, students should have to go to summer school. If your kid has to go to summer school the parent has a bad grade, the parent should be charged for summer school collected by Idaho tax commission.

**15. [REDACTED] Retired Educator, Pocatello School District #25**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Yearly pretest all students for reading level. Place them in the appropriate level books. I did this and by myself ran 3 reading groups a day. Everyone improved in reading! A child reading on a 4th grade level should not be in a 6th grade reader! Every child gained in reading due to correct placement! I had 35 students in 6th grade that year.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Teachers need more assessment of their teaching abilities! I saw some horribly ineffective teachers in my career!! No principal did anything!

*Draft Recommendation 3: Ed Flex State Status*

Because we had old readers in the basement, I was able to place students in appropriate level books that were new to them.

*Additional Comments:*

Principals that care and are observing classrooms unannounced more frequently.

**16. [REDACTED] Nampa***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

As a public school educator who has devoted my career to supporting Idaho's students and teachers, I want to express both deep concern and cautious optimism regarding the Idaho Department of Education's exploration of ESSA waivers and Ed-Flex state status.

Idaho's public schools rely heavily on federal funding to ensure that all students—particularly those from historically underserved populations—receive equitable educational opportunities. Federal programs such as Title I, Title II, Title III, and Title IV are not "bureaucratic red tape"; they are essential lifelines that help schools provide high-quality instruction, professional learning, literacy interventions, and student support services that our state funding structure simply does not adequately sustain.

While I appreciate the intent to streamline reporting and reduce redundancy, any move to "remove requirements not explicitly required by law" must be handled with extreme care. Federal funds come with accountability measures for a reason: to safeguard equity, transparency, and consistency across districts and schools. Without these guardrails, there is a significant risk that flexibility could translate into inequity—especially in a state where public education funding remains among the lowest in the nation.

If Idaho pursues Ed-Flex status or ESSA waivers, I urge the Department to:

1. Maintain rigorous equity and accountability standards that ensure federal dollars directly support students most in need.
2. Engage practicing educators, families, and local communities—not only administrators and business managers—in shaping how federal programs are administered.
3. Commit to transparent public reporting so that flexibility does not obscure how funds are allocated or how student outcomes are measured.

4. Preserve the original intent of the Elementary and Secondary Education Act: to provide every child, regardless of zip code, race, or socioeconomic status, a fair and equitable opportunity to succeed.

Idaho educators and families deserve a system that empowers local schools while still honoring the federal promise of equity and access. True flexibility should strengthen—not weaken—our shared commitment to public education and to every child's right to a high-quality education.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

See comments from recommendation 1.

*Draft Recommendation 3: Ed Flex State Status*

See comments from recommendation 1.

*Additional Comments:*

See comments from recommendation 1.

**17. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Brilliant - we need less red tape and more flexibility to meet the needs of our academically at-risk students. This is well written and serves to keep our focus on students and academic growth!

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

This is BY FAR, the most meaningful change to public education that could occur in the State of Idaho in the last 33 years I have been working in education. Concisely, 3rd grade students are OVER-ASSESSED: it significantly decreases available instructional time AND it adds to their already diminished mental acuity. Simultaneously, local discretion to individuate the needs of our 11th grade students is paramount to graduation success and our goal to increase self-efficacy for our high school students. This entire recommendation is BRILLIANT and the MOST important, in my opinion.

*Draft Recommendation 3: Ed Flex State Status*

Wonderful - we certainly could use a streamlined and focused approach. Flexibility for public education is of the highest priority in the current climate.

*Additional Comments:*

Thank you very much for your work on our behalf - much appreciated, bwm

## 18. [REDACTED] Pocatello

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No comment.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Yes, please consider this draft recommendation 2 which states: Replace the Third Grade ELA ISAT with the existing Third Grade Idaho Reading Indicator (IRI). The ISAT ELA portion is way too hard for third graders to test on. The passages they have to read, answer questions about and write a response about are not grade level appropriate and have been written by someone who has had no interaction with 8 - 9 year old students. The ISAT ELA portion is not made for students on IEP's. If a student is on an IEP and is not at grade level reading the student does not answer correctly and completes the exam in 10 minutes. Thus making the student's score a failing score. Even with accommodations IEP student still receive a failing score. The ISAT ELA portion requires all students to sit for 2-3 hours in order to complete the ISAT ELA portion. This time frame is way too long for an 8-9 year old student to still sit and stay quiet. Students then have testing fatigue because of how long they are being tested for.

*Draft Recommendation 3: Ed Flex State Status*

No comment.

*Additional Comments:*

No comment.

## 19. [REDACTED] Boise

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No comment.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Of special concern: How will the SDE/OSBE keep the public informed about statewide student achievement over time in language, math and other subjects required at the high school level?

*Draft Recommendation 3: Ed Flex State Status*

No comment.

*Additional Comments:*

No comment.

**20. [REDACTED] Twin Falls School District #411 Educator and Parent***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I support flexibility for LEAs to use federal funding as needed.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I support flexibility in the 11th grade assessment - our 11th graders should be focusing on using their time and energy working toward their personal goals, not completing \*at minimum\* 5 hours of testing, only to meet state compliance. With the numerous student choice and flexibility policies that have been put into place over the last several years, it's very outdated to make all students in one grade take a test as they are all in different levels of math, English and science.

I also support using the IRI for 3rd graders. I used to proctor the ISAT at my previous elementary school and the stress and anxiety this test gives to students is ridiculous! It takes too long to test these poor kids and I fully support using shorter, more frequent and familiar tests to monitor students growth and progress.

*Draft Recommendation 3: Ed Flex State Status*

I support increased flexibility and local control of federal funding.

*Additional Comments:*

My primary feedback is about the ISAT - I think it's too lengthy, too "high stakes", and really tells students and families very little about their skills in math and English and science. I would love to see a whole different assessment system used to monitor longitudinal growth and progress. Why are we putting this stress and anxiety on our students?

**21. [REDACTED] Boundary County School District #101***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I appreciate the reduction in duplication. IDE is amazing at supporting our districts, but this recommendation will significantly decrease frustration and increase efficiency.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

While I recognize the importance of statewide testing data in setting priorities, allocating resources, and measuring goals, I am in favor of limiting the amount of instructional time that

goes to completing these statewide assessments. These comprehensive tests take away from instructional time and can be taxing for students and teachers. I support the recommendations to change the 3rd grade assessment from ISAT to IRI and the 11th grade assessment to a student selected assessment.

*Draft Recommendation 3: Ed Flex State Status*

I am a little concerned about the flexibility in these areas, but hope IDE will truly allow districts to write plans designed to support the LEAs specific needs. Sometimes when funds are consolidated, then true intentions and use of the funds are blurred.

Minor . . . but under additional comments a period is needed at the end of the first sentence.

*Additional Comments:*

Thank you for your work on this waiver.

**22. [REDACTED] Cassia County Joint School District #151**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I support draft recommendation #1. I believe it is important to update reference materials, application processes, and monitoring to provide clarity, reduce duplication, and eliminate restrictions that go beyond Federal Law. Administering federal grant awards has become increasingly burdensome at both the state and local level. This is a good opportunity to check if these processes and rules are improving educational outcomes for students or are impeding progress by requiring a greater share of administrators focus to be on regulatory compliance rather than educational goals. I hope that we all believe the best decisions are made at the local level and that we can return to a trust but verify model instead of bureaucratic model that requires excess data and hurdles before accessing resources. A pivot in focus to performance and efficiency would be welcome.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

While I recognize the importance of statewide testing data in setting priorities, allocating resources, and measuring goals, I am in favor of limiting the amount of instructional time that goes to completing these statewide assessments. These comprehensive tests take away from instructional time and can be taxing for students and teachers. I support the recommendations to change the 3rd grade assessment from ISAT to IRI and the 11th grade assessment to a student selected assessment.

*Second Submission:* Had some additional thoughts from my last comment. What we would like to see in terms of assessment is using a growth model rather than a proficiency model. IE did

the student show growth from the last time they were assessed, rather than are they proficient, because some students will never achieve proficiency. The other thing we would like to see is 9th graders take the ISAT and if they bank a score they don't have to take it again. But if they don't then they take it again as 10th graders.

*Draft Recommendation 3: Ed Flex State Status*

If the SDE applies for Ed-Flex a thorough analysis needs to be done to weigh if the additional reporting requirements justify the increased flexibility. Some items that may be worth applying for flexibility would be to increase carry over 25% of Title I Part A funds. Reducing the requirement to use 20% of Title IV funds on social emotional learning. Eliminating semi-annual certification for employees who work solely from a single funding source. Lowering the threshold for eligibility to implement Title I, Part A, Schoolwide programs.

*Additional Comments:*

No comment.

**23. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Please allow for a revision of key elements for federal (both Title and IDEA) programming administration to reduce local burdens and highlight federal program flexibilities and spending options.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Please allow for modification of Idaho's ESSA-required comprehensive assessment framework through a waiver for 3rd grade ISAT ELA and 11th grade ELA and math ISAT. This requested change will ensure that state-required assessments are aligned with the goals of increasing early literacy and middle-grades mathematics achievement along with supporting graduation pathways and post-secondary outcomes

*Draft Recommendation 3: Ed Flex State Status*

Please apply for "Ed-Flex" state status to gain the authority to waive provisions of a variety of federal programs to assist local education agencies in designing and implementing those programs to best meet the needs of their students and communities.

*Additional Comments:*

Thank you!

24. [REDACTED] Lake Pend Oreille School District #84

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Update LEA's

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Please consider eliminating 3rd Grade ISAT

*Draft Recommendation 3: Ed Flex State Status*

No comment.

*Additional Comments:*

No comment.

25. [REDACTED] Lake Pend Oreille School District #84

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I support this.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I am fully in support of getting rid of the ISAT for 3rd and 11th, but hesitate to remove that accountability at the high school level. I would suggest a return to testing 10th grade via the ISAT. Third grade ELA is already tested by the IRI. For Math at 3rd, I would suggest MAP.

*Draft Recommendation 3: Ed Flex State Status*

I support this.

*Additional Comments:*

No comment.

26. [REDACTED] Lake Pend Oreille School District #84

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Yes, in agreement with this recommendation.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Yes, in agreement with this recommendation.

*Draft Recommendation 3: Ed Flex State Status*

I support this.

*Additional Comments:*

No comment.

**27. [REDACTED] Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I agree with this portion - Revise its state-developed schoolwide and school improvement planning process.

The Idaho Department of Education requires LEAs and schools to use a single state-developed tool to satisfy several different Title I planning requirements.

The tool omits some elements required by federal law for one program while adding elements not required by federal law for that program. The Idaho Department of Education can revise its process to better differentiate which requirements apply for each program and/or circumstances, so LEAs and schools can satisfy federal requirements while also maximizing their planning options.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I agree with : Replace the Third Grade ELA ISAT with the existing Third Grade Idaho Reading Indicator (IRI). Replace the 11th Grade ISAT with a student-selected assessment/LEA-selected assessment, aligned with graduation pathways and/or post-secondary goals.

Would the state consider moving the 11th-grade requirement to grade 10 rather than 11? The and/or statement or language should be removed and be determined or required by LEA.

*Draft Recommendation 3: Ed Flex State Status*

I agree with this recommendation, specifically with this portion -The Idaho Department of Education will apply for Ed-Flex state status for Idaho. Requested flexibilities may include schoolwide eligibility, allowing additional carryover, program streamlining, and blending funding sources. Additional suggestions related to flexibilities may be included if there is interest on the part of LEAs. Ed-Flex waivers are tied to the measurable education goals for the LEAs or school and requires the LEAs to explain how the waiver will assist the LEAs in achieving the goals for all students or the specific student groups impacted by the waiver request.

*Additional Comments:*

Please be clear with language as to not introduce too much choice language for families to opt out or elect a variety of assessment options. We have great LEA systems in place.

**28. [REDACTED] Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Rewrite key guidance documents for LEAs and update reference materials.

Consider burden reduction opportunities in subgrant application processes.

Revise its state-developed schoolwide and school improvement planning process.

Streamline and coordinate subrecipient monitoring

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Replace the Third Grade ELA ISAT with the existing Third Grade Idaho Reading Indicator (IRI).

Replace the 11th Grade ISAT with a student-selected assessment/LEA-selected assessment, aligned with graduation pathways and/or post-secondary goals.

*Draft Recommendation 3: Ed Flex State Status*

The Idaho Department of Education will apply for Ed-Flex state status for Idaho. Requested flexibilities may include schoolwide eligibility, allowing additional carryover, program streamlining, and blending funding sources. Additional suggestions related to flexibilities may be included if there is interest on the part of LEAs.

*Additional Comments:*

No comment.

**29. [REDACTED] Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I am in full support of Proposal 1. Reducing unnecessary burden on districts is essential, especially for small and mid-sized LEAs where administrative time directly impacts the quality of support provided to students.

Rewriting guidance documents, eliminating duplicative elements in the CFSGA, and aligning the schoolwide planning tool more accurately with federal requirements will all meaningfully reduce the “over-compliance” that has become common practice. The current planning tools

require components that exceed ESSA expectations, often leading to inefficiencies that do not translate to improved outcomes.

Linking monitoring items directly to federal statutes is another critical step. Monitoring should be a targeted compliance process, not an expansion of requirements beyond what the law demands. These changes will allow LEAs to focus their limited staff time on actual student supports and interventions instead of procedural tasks.

Overall, Proposal 1 strengthens clarity, improves accuracy, and allows districts to use their resources more effectively.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I strongly support Proposal 2 and believe this is the most student-centered recommendation in the draft.

Replacing the 3rd grade ELA ISAT with the Idaho Reading Indicator (IRI) is a practical and instructionally aligned improvement. Schools already use the IRI as a real-time literacy measure tied to early reading supports. Using a single, well-designed, developmentally appropriate assessment reduces redundant testing and refocuses efforts on early literacy intervention—the area Idaho has clearly identified as a statewide priority.

The shift away from a one-size-fits-all 11th-grade ISAT to pathway-aligned assessments is equally important. Allowing students to take SAT, ACT, CLT, ASVAB, WorkKeys, or ISAT depending on their goals reflects the reality of individualized career and college pathways. It also restores instructional value to the junior-year assessment, rather than maintaining a test that serves limited local purpose beyond federal reporting.

This flexibility acknowledges that readiness looks different for students pursuing the workforce, military, trades, or college. This waiver will better align the state's accountability system with Idaho's updated graduation pathways and allow districts to meaningfully support students' post-secondary plans.

*Draft Recommendation 3: Ed Flex State Status*

I fully support Idaho pursuing Ed-Flex state status. Providing LEAs with more control to design programming that meets local needs is consistent with Idaho's educational values and the direction many districts are already moving.

Expanded schoolwide eligibility, carryover flexibility, and the ability to blend or streamline funding sources would immediately benefit districts like mine, where administrative load is often disproportionate to staffing capacity. Ed-Flex is not the elimination of accountability—it is

the removal of unnecessary constraints so schools can meet accountability expectations more effectively.

Having the authority to approve waivers at the state level also encourages innovation and speeds up solutions for local challenges. Idaho can hold districts to high expectations while still recognizing that every community's context is unique.

I support moving forward with the Ed-Flex application and developing a statewide waiver framework that is transparent, accessible, and responsive to the needs of LEAs.

*Additional Comments:*

As an administrator working daily with school improvement planning, federal programs, student assessment systems, and multi-tiered supports, I fully support the Idaho Department of Education's efforts toward smarter flexibility.

Across multiple areas of practice, I have consistently seen:

Excessive procedural requirements dilute the impact of federal resources. Districts spend too much time meeting state-added processes rather than delivering support to students.

Assessment clarity matters. Students, teachers, and parents benefit from systems that are aligned, purposeful, and age-appropriate.

Local decision-making is key. As someone who manages building-level programs, athletics, PBIS structures, and interventions, flexibility allows us to respond quickly to actual student needs, not template-driven requirements.

Streamlined monitoring and planning leads to stronger implementation. When accountability systems are clean, aligned, and directly tied to statute, staff can spend more time on instruction and student support.

Pathway-aligned assessments reflect the real world. A single assessment for all 11th-graders does not make sense for modern educational, economic, or military readiness pathways.

These recommendations collectively move Idaho in the right direction—toward clarity, efficiency, local innovation, and systems that empower schools to focus on student achievement instead of excessive paperwork.

**30. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I completely support this recommendation.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Our third grade students are over tested. They must take multiple assessments, more than any other grade level. This is a huge stress for 8-year olds. They should not take the ISAT until 4th grade, the IRI covers what we need to know about their reading levels.

*Draft Recommendation 3: Ed Flex State Status*

I support this recommendation.

*Additional Comments:*

Thank you for asking, it is appreciated.

**31. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I agree with this recommendation.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

I agree with this recommendation.

*Draft Recommendation 3: Ed Flex State Status*

I agree with this recommendation.

*Additional Comments:*

I support third grade NOT taking ISATS.

**32. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Yes, I'm in agreement with recommendation 1.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Yes, I'm in agreement with recommendation 2. 3rd grade already has IRI data for specific reading skills and growth measures.

*Draft Recommendation 3: Ed Flex State Status*

I agree with this recommendation.

*Additional Comments:*

I'm in agreement with all recommendations.

**33. [REDACTED] r, Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I agree with recommendation 1.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Assessment Waiver for Third Grade ISAT ELA and 11th Grade ELA and Math ISAT - 3rd grade already takes the IRI for a reading assessment. Currently, our third grade students are required to take more assessments than our older students. This is a lot for our young learners.

*Draft Recommendation 3: Ed Flex State Status*

No comment.

*Additional Comments:*

No comment.

**34. [REDACTED] Lake Pend Oreille School District #84, Sandpoint High School***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Yes, I am in agreement with this recommendation.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Yes, I am in agreement with this recommendation.

*Draft Recommendation 3: Ed Flex State Status*

Yes, I am in agreement with this recommendation.

*Additional Comments:*

Test fatigue at the secondary level is real. Eleventh grade students begin the testing season in March with ELA, Math, and Science ISATS. They take the SATS. Many students opt out of these due to the fatigue already beginning. AP Students may take upward five AP tests before the end of May as well. As a secondary principal, by first recommendation would be to have students complete a localized pathway with SATs or ASVAB based on their post-secondary plan. If this is not possible, my second recommendation would be to move the ISATS to 10th grade to alleviate junior year testing fatigue and to truly help guide instructional placement for the final two years of high school.

**35. [REDACTED] Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

The number of qualified students with disabilities is going up along with the demands of meeting their intense needs. However, funding is not growing. We need a dedicated budget line of state funds to support these services. Please increase the funding for Special Education in Idaho. Failing to do so is dropping the ball and a complete disservice to this growing and deserving segment of education.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

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*Draft Recommendation 3: Ed Flex State Status*

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*Additional Comments:*

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**36. [REDACTED] Lake Pend Oreille School District #84***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Streamlining will save money and time for these groups.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Testing fatigue is an issue in most of our schools. Speaking as a former elementary assistant principal and current secondary assistant principal, we already use IRI for 3rd graders and over testing our little ones is not productive. It does not give us the data that is intended. At secondary, 11th grade students are also over tested, especially if students are taking multiple classes with AP course testing (possibly 8-9 high stakes tests by spring). Too much for our students to be successful.

*Draft Recommendation 3: Ed Flex State Status*

This supports our district and I hope overall state vision of Title 1.

*Additional Comments:*

I support.

**37. [REDACTED] Lake Pend Oreille School District #84**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Consider burden reduction opportunities in subgrant application processes Streamline and coordinate subrecipient monitoring.

The Idaho Department of Education can streamline its monitoring by linking each item monitored to a specific federal requirement. The Department's ESEA monitoring processes are robust, sometimes go beyond federal requirements, and may duplicate other oversight processes. Additionally, the Department does monitoring throughout the application, implementation and reimbursement process; and monitors the entire process.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Assessment Waiver for Third Grade ISAT ELA and 11th Grade ELA and Math ISAT -

Third Grade ISAT ELA - Third graders are currently tested too much. It can create anxiety for many children.

*Draft Recommendation 3: Ed Flex State Status*

Apply for Ed Flex State Status

*Additional Comments:*

The most important recommendation for an elementary school would be to eliminate the ISAT ELA at the 3rd grade level. Restructuring the Title requirements would allow for personnel to focus on teaching and learning and less on paperwork documentation.

**38. [REDACTED] University of Idaho, Idaho Building Capacity Project***Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

This change could be good if Idaho matches increased flexibility with resources that ensure leaders have the coaching, data skills, and improvement structures needed to turn flexibility into coherent action rather than compliance minimalism. For very low-achieving schools in the Idaho Building Capacity Project (IBC), this does.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

If Idaho adjusts its assessment system, districts will need strong support to interpret new metrics, align improvement plans, and maintain instructional coherence.

For IBC schools, leadership coaches (CBs) help school leaders use data to measure and fuel robust continuous improvement cycles.

*Draft Recommendation 3: Ed Flex State Status*

Ed Flex status. This could be very helpful; however, it is key that you all ensure your theory of action includes what works, including leadership capacity building. IBC in R1 and 2 is an example of a project that, even without controlling for other factors (leadership turnover, school board churn, and the ever-present quick-improvement ideas that come and go too quickly), shows lasting, visible results. Even in very complex contexts in Regions 1 and 2, LEAs that have been in IBC for years, the CBs work using a well-tested framework show improvement.

Idaho's move toward Ed-Flex and reduced federal burden will only succeed if districts have the leadership capacity to use these flexibilities wisely and coherently. The Idaho Building Capacity Project (IBC) is uniquely positioned to anchor that theory of action. IBC provides sustained, evidence-based leadership coaching that helps schools translate flexibility into stronger instructional systems, effective use of Title funds, and measurable gains in early literacy, middle-grades math, and postsecondary readiness (outcomes highlighted in the proposed waiver). Without a statewide mechanism like IBC, flexibility risks devolving into fragmented, short-term activities rather than strategic, student-centered improvement. Including IBC explicitly in Idaho's Ed-Flex implementation ensures that districts have the leadership, data-use skills, and continuous-improvement structures necessary to turn flexibility into tangible results for Idaho students.

*Additional Comments:*

To best support you all, we really need transparency and partnership here to gain clarity around these three questions:

- 1) How do you anticipate Ed-Flex changing Title II priorities and allocations at the state level?
- 2) Do you foresee any change to the state-level Title II set-aside that funds IBC?
- 3) How do you want IBC to help districts navigate new flexibilities (especially around blending Title II with other funds)?

Additionally, as we prepare future Principals, Superintendents, and Special Education Directors at the University of Idaho, we really need to understand leadership support pathways for individuals best once they finish their degrees. We are your partners here and can support you all with PD, research, and administration of improvement programs if we have enough lead time and resources.

Thanks for thinking about the future of Idaho education and for your work supporting systems that connect all kids to educational excellence.

39. [REDACTED] Caldwell, ID

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

“Flexibility” in the use of federal education funds has been the standing verbiage since 2001's reauthorization of the Elementary and Secondary Education Act (ESEA) or “No Child Left Behind.” “Reforms” were to be based on “accountability, flexibility and choice.” Now it's called the Every Student Succeeds Act (ESSA). 25 years later it's good to remind the public that “flexibility” was to be in exchange for “results” (designated as “accountability” to the public).

ESSA states under the special grants to expand charter schools that the state will “evaluate the impact of charter schools on student achievement, families, and communities, and share best practices between charter schools and other public schools.” That has not happened, which means there is no accountability for our federal dollars never having produced shared “best practices” or “innovations.” In other words, there has been no accounting for results of the 26 years the state has been approving charters and our federal dollars have given “flexibility” to support this experiment.

So, what is all this going to mean for the private schools that will be taking public education money?

The federal law requires the public schools serve eligible private school students “equitably.” Does that mean the students can receive a tax credit voucher that they can use to enroll in a private school and still receive services by the local public school district?

In light of the fact that the four actions proposed in Recommendation 1 are not required of the federal application for a waiver or Ed-Flex status, my recommendation is to wait to rewrite all the reference materials, wait to reconsider the subgrant application process, and wait to revise the school improvement planning processes until what time the public can better give input on these topics of local importance. However, I would recommend proceeding with the fourth part by revisiting the Department's ESEA monitoring processes and clarifying those elements to the public.

Currently, I believe the public is at a loss as to what the Department means by a “robust” monitoring process.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

At first glance, this recommendation looks like it's only about waiving 3rd grade ISAT ELA and 11th Grade ELA and Math. Three concerns here:

First, "the provisions that can be waived under ESSA waivers include assessment, accountability, interventions, transparency and reporting." Remember, No Child Left Behind (NCLB) was based on "accountability, flexibility, and choice." ESSA is NCLB with more choice dollars added, now including federal vouchers. So as long as "choice" is in the equation, the taxpaying public needs to consider how flexibility of our education dollars will be accounted for — in what kind of system does tracking the flow of money ensure accurate accounting — and what additional costs are associated with holding a flexible choice system accountable.

Secondly, these are the Two Requests Related to Idaho's Assessment Framework Being Considered:

1. Replace the Third Grade ELA ISAT with the existing Third Grade Idaho Reading Indicator (IRI)
2. Replace the 11th Grade ISAT with a student-selected assessment/LEA-selected assessment, aligned with graduation pathways and/or post-secondary goals.

#1 To give an opinion on that replacement would require hearing from teachers as to which test they have seen align best with their student's classroom performances and teacher created testing.

#2 This change does not seem to be at all in line with a state accountability system whose purpose is to judge (as best a standardized test can) the trend the state is taking towards providing a thorough system of public schools, which this state long ago set according to standards and graduation requirements. That is what every public school was expected to strive to meet. This was not an individual choice or a local choice. How you achieved the standards and met the requirements is, but the assessment at the end of a students K-12 educational journey was not negotiable because assessing the school and the system was not negotiable.

The third issue with being granted an assessment waiver is in looking at the topic in relation to Recommendation #3 — to apply for Ed-Flex STATE Status. That leads to my main concern — in a nation that set out to achieve educational opportunity for all children, when our decades old accountability mechanism is being changed to bypass certain “statutory or regulatory education requirements,” it’s time to look at those laws and rules. Let’s quit tinkering around the edges. Let’s work together to make the federal law better.

Anyone really think we can reach the goals that have been set for us without transparency and reporting?

How is public transparency even possible in a multi-systems hodgepodge of publicly-funded schools where private entities are involved, which have different authorities under which they work?

#### *Draft Recommendation 3: Ed Flex State Status*

Recommendation 3: Applying for “Ed Flex State Status”

This is a big deal. So, I think it is important to note that word of this comment period opening and ending was only whispered out to the Idaho public on November 15, 2025 in an announcement in the Bonner County Daily Bee (only place I saw it). Only then did I go looking to see what it was all about.

The official contact from the U.S. Department of Education about this application was made on September 17, 2025. And as stated in the IDOE introduction, the Ed-Flex Act itself was enacted in 1994 as part of Goals 2000. It was then incorporated into the gargantuan law ESSA, which has drifted GREATLY from its original goals and strategies as the 1965 Elementary and Secondary Education Act.

The public needs to look very closely at the “Ed-Flex program.”

The Educational Flexibility (Ed-Flex) program — allows the U.S. Secretary of Education to delegate the authority to State educational agencies (SEAs) — to waive statutory or regulatory

education requirements at the local level if it's determined the requirements "MAY" impede local efforts.

For the Idaho public to make their own call on what may be the positive and/or negative consequences of being an Ed-Flex state, an Idaho citizen would need to know the DETAILS of the following federal programs the state would be given the authority to waive. That means considering the DETAILS of the entire Carl D. Perkins Career and Technical Education Act of 2006, as amended, and the following sections of the Every Student Succeeds Act (ESSA):

Title I, Part A (other than section 1111)

Title I, Part C

Title I, Part D

Title II, Part A

Title IV Part A

Currently, who does have state authority to waive statutory or regulatory education requirements? Isn't that a requirement for applying?

*Additional Comments:*

Overview In the Idaho Department of Education's overview, it states that part of reducing burdens on local educational agencies includes "removing Department requirements that go beyond what is mandated by federal law." But before proceeding with waivers from the laws or new regulatory status being given to the state, the public should be better informed as to what that means when it comes to transparency and accountability in a "school choice" system, such as the one Idaho has now developed.

The federal law states, "The accountability provisions under this Act shall be overseen for charter schools in accordance with State charter school law." If we want "spending flexibility" in exchange for results, the tax-paying public deserves to know what the results have been when it comes to charters, particularly when it comes to meeting what is in the law. And this same request should now apply to any public funds for "school choice" options that is in law now or in the future.

QUESTION: what is adequate notification to the public in order for them to make informed decisions about commenting?

Ultimately, this is a huge step and deserves a public question and answer session as well as a listening session by school boards, lawmakers, and all regulatory agencies involved in government oversight of our system of public schools.

Improving K-12 Federal Programs Administration requires an informed president, congress and the public. Isn't that the duty — by law — of the USDOE under the direction of the Secretary?

We, the People, need informed discussion and debate.

**40. [REDACTED] College Board**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

Idaho's proposal to replace a single statewide grade 11 assessment with a student-choice or district-choice menu raises substantial compliance, operational, and resource challenges. Multiple assessments used for accountability cannot meet ESSA section 1111(b)(2) requirements for statewide comparability and USED has consistently declined to approve models that introduce student-level test choice. In addition, supporting several different assessments simultaneously would require Idaho to manage multiple test windows, platforms, accommodations processes, and reporting systems. This would place significant and ongoing demands on state and district capacity, particularly in rural communities. Given these concerns, the assessment menu as proposed is unlikely to be approvable and would create notable administrative strain without delivering a coherent statewide measurement system.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Concern: Misclassification of SBAC as a College Entrance Exam (CEE)

The draft identifies SBAC as a College Entrance Exam, but SBAC does not meet the federal definition under ESEA section 1111(b)(2)(H). A CEE must be used for college admission and must measure college readiness rather than grade-level proficiency. SBAC is a summative grade-level assessment and is not accepted by colleges for admissions decisions. Misclassification will create confusion and complicate USED review. We recommend revising the assessment labels to ensure alignment with federal law.

*Draft Recommendation 3: Ed Flex State Status*

We are aware of two states pursuing student-choice testing systems, with Arkansas in the early stages and South Carolina further along. Both are mandating the choice, but student participation is optional, and the outcomes are not being used to meet ESSA requirements. Early experience from both efforts shows that student-level choice creates substantial operational demands for schools and districts, including complex scheduling, staffing,

technology support, and accommodations management. These implementation and policy risks should be carefully examined as Idaho considers whether this model can be implemented in a way that supports statewide accountability and meets federal expectations.

*Additional Comments:*

As ESSA reaches its tenth year, it continues to provide an important balance between strong federal guardrails and meaningful state flexibility. Any state seeking an ESSA waiver should aim to maintain that balance by ensuring that proposed changes preserve the core principles of comparability, equity, and coherence while still allowing innovation. Above all, waiver requests should be designed with students at the center, supporting clear expectations, consistent statewide practice, and equitable access to opportunities.

**41. [REDACTED] Pocatello Chubbuck School District #25**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I am definitely in favor of revising the schoolwide improvement process. Aligning this process to better meet the demands of state and federal requirements will lead to improved efficiencies and plans.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Removing the 3rd grade ELA ISAT will help teachers and learners continue to focus on foundational reading skills and take the pressure off for a high stakes assessment when skills are still being developed.

*Draft Recommendation 3: Ed Flex State Status*

I agree that states should retain flexibility in allowing LEA's to best meet their individual community and school needs.

*Additional Comments:*

No comment.

**42. [REDACTED] Cassia County Joint School District #151, CCEA IEA**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

I'm sharing this in regards to our governor slashing the funding for the families who are raising their adult children with severe disabilities. I'm watching my best friend dealing with her son whom she loves more than life itself with a severe disability. She is so nervous about how she will continue to raise him without the additional needed funds. He is in his 20s and needs help and support 24 hours a day 7 days a week. Due to this, he is her full time job. She is unable to

work full time outside of the home. It's so sad that those who need the state funding the most are never even considered for it. The laws need to be changed. We need the funds for those with disabilities. Even our students are not getting their needs met because the funding isn't there. I invite those in the government to come to the special Education classrooms and see what supports we need. I invite them to homes like my best friends who need the extra funding just to ensure that their child's needs are being met.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

As a special education teacher I have to become creative on how to teach my students of different learning levels at the same time. I'm running several different groups of different intervention levels at the same time to meet their service minutes and needs. I'm the case manager overseeing 7 different grades. I not only have lesson plans to write, I have IEPs to write. Progress reports 4 times a year. Assessments to give. Monitoring my students behaviors. Communicating with 7 different grades of teachers. Communicating with parents. I'm expected to do all of this between the 8 to 4 day time. I end up working from home. I end up working on the weekends. Please come see our daily routines and what resources we need in order to meet our students learning needs.

*Draft Recommendation 3: Ed Flex State Status*

Please come to our classrooms. We invite you to see what resources we are lacking and what supports we need.

*Additional Comments:*

Ask for a panel of general education teachers and special education teachers. Listen to us. We're in the classrooms everyday.

**43. [REDACTED] Sage International School of Boise #475 and Middleton #528**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No comment.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Replace the Third Grade ELA ISAT with the existing Third Grade Idaho Reading Indicator (IRI). I support replacing the 3rd grade ELA assessment with the IRI, currently provided by Amira. The IRI assessment is already a requirement K-3. At this point in time, 3rd grade is the most heavily tested grade level in K-12 for state testing. The ISAT ELA performance task is asking a lot of a grade level that is still actively learning how to read. By removing potentially 3 days of testing

for 3rd grade, we are giving back 3 days of solid instruction time. Testing days disrupt the normal rhythm of a teaching day. Recommendations for the 3rd grade ELA ISAT include 1 session for the CAT and 2 for the PT, meaning 3 additional days of interrupted instruction.

I still value administering ISATs in 11th grade or another HS grade. This is a longitudinal data point that hasn't been captured since 8th grade. I support having a consistent HS measurement.

*Draft Recommendation 3: Ed Flex State Status*

No comment.

*Additional Comments:*

Could grade 3 be assessed with the iStation/Amira math ISIP and have the ISAT math portion removed as well?

44. [REDACTED] Blackfoot, ID

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

No comment.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

As both a parent and a mathematics teacher, I feel compelled to speak out about the growing burden of the ISATs and the misalignment and unintended consequences they have created. The level of stress placed on students, families, and educators is disproportionate to any meaningful benefit these assessments provide. Simply put, the test does not align with essential standards, nor does it reflect the lived experiences of students with diverse goals, strengths, and postsecondary pathways.

We openly and regularly acknowledge that students do not all share the same futures—yet we continue to insist on a single, required 11th-grade assessment for all students. This is fundamentally contradictory. The mathematical knowledge required for a student pursuing welding is not the same as that required for a student preparing for a four-year college, nor is it the same as that needed for nursing or other career paths. Expecting one test to fairly and accurately measure readiness for such varied outcomes is neither logical nor equitable.

I fully understand and support the need for accountability in education. However, large-scale standardized testing rests on a deeply flawed assumption: that teachers are the sole determinants of student learning. In reality, teaching is only one part of a larger, more complex system. I can expose students to content, explain concepts, provide support, differentiate instruction, and offer multiple opportunities for practice—but learning also depends on factors

far beyond my control. Students must attend consistently, engage meaningfully, have adequate nutrition, rest, emotional stability, and personal motivation. They have agency, and they are influenced by circumstances that no test can measure. Reducing learning to a single test score is not only inaccurate; it is insulting to students and to educators alike.

My greatest familiarity lies in math transition pathways, and I support assessments that align with different pathways and student goals. In theory, this approach respects student choice and relevance. In practice, however, it presents challenges—particularly in rural and alternative high school settings. In my setting, as the sole math teacher for approximately 120 students, I cannot be expected to offer all possible pathways while simultaneously being held accountable for whether students master all content across those pathways. This expectation is neither realistic nor sustainable.

Thus, we must also confront an uncomfortable but necessary question: how will we prevent “pathway-aligned” testing from simply becoming another one-size-fits-all assessment? When staffing, scheduling, and resources limit the number of pathways a school can realistically offer, students are not truly choosing a pathway—the system is choosing for them. Without sufficient options, we risk recreating the same inequities under a different name.

Ultimately, we need to step back and ask a fundamental question: What are we hoping testing will actually accomplish? If the goal is to ensure basic mathematical literacy for life and citizenship, then we should be honest about where that threshold lies. Perhaps a common assessment that ensures mastery of foundational mathematics (through 8th-grade content and data literacy) would suffice. Even as a mathematics teacher, I question how much of advanced high school mathematics is essential for most adults to live productive, informed lives once that foundation is secure.

If we are serious about equity, relevance, and meaningful accountability, then our assessment systems must reflect the diversity of student goals, the realities of classroom instruction, and the shared responsibility for learning. Anything less does a disservice to our students and undermines the professionalism of educators.

*Draft Recommendation 3: Ed Flex State Status*

I support greater flexibility and control in our local areas for the reasons shared earlier.

*Additional Comments:*

We need better support for homeless families and homeless teens, and we need true social workers in schools. There simply isn't enough money to replace families, yet teachers are expected to do so. Anything we can do to reduce the money spent on 'overhead' and

'bureaucracy' and get the money to directly impact the students and the work teachers do is something we need to do.

**45. [REDACTED] Idaho Virtual Academy #452**

*Draft Recommendation 1: Spending and Reporting Flexibility in State Administration for Title and IDEA Programming*

The recommendations look reasonable.

*Draft Recommendation 2: Assessment Waivers for 3<sup>rd</sup> Grade ISAT ELA and 11<sup>th</sup> Grade ELA and Math ISAT*

Please do implement the 2 requests! I've proctored ISATs for 3rd graders and the ELA test is such a burden to them. The IRI is much less so and more important for students at that age.

I love the choices for 11th grade testing! I teach in an alternative hs and the ISAT doesn't test what our students know and can do. Sometimes our students are credit deficient and are not ready for the ISAT in 11th grade. Please give us choices!

*Draft Recommendation 3: Ed Flex State Status*

The Ed Flex program sounds good for our students and our state.

*Additional Comments:*

Simplifying is a great goal.