



LOUISIANA DEPARTMENT OF EDUCATION

March 27, 2017

Mr. Scott Richard, Executive Director
Louisiana School Boards Association
7912 Summa Avenue
Baton Rouge, LA 70809

Dear Mr. Richard:

Thank you for your letter regarding the submission of Louisiana's ESSA state plan to the U.S. Department of Education for review and approval.

As you know, Wednesday, March 29, the state Board of Elementary and Secondary Education (BESE) will consider whether to direct the Louisiana Department of Education (LDE) to seek federal input on the state's plan. Only after another three months will BESE consider policy on this subject.

For nearly one year, the LDE has been working with stakeholders to develop Louisiana's plan, holding 136 [meetings](#) across the state with hundreds of educators, school leaders, parents, advocates, business and industry leaders, postsecondary education representatives, policymakers, and formal advisory councils, including but not limited to meetings of the Superintendents Advisory Council and the Accountability Commission. Detailed information on ESSA stakeholder consultation can be found at www.louisianabelieves.com/essa.

Throughout these many conversations, the LDE has indicated its intent to submit Louisiana's state plan for federal review and approval by the beginning of the 2017-2018 school year in order to provide educators with clarity about expectations and how they will be measured.

This plan is also consistent with the 2013 announcement by BESE of its intent to gradually shift to "mastery" as the state's performance expectation for A-rated schools in Louisiana. This goal was codified in Bulletin 111 and has been discussed extensively in numerous stakeholder meetings since that time.

In your letter you cited six aspects of the proposed plan. What follows are responses to each concern.

- *The new option afforded to the LDOE to withhold an additional 3% of federal funds that are intended for local districts and students*

Louisiana Believes.

Title I within ESSA is intended to provide a “fair, equitable, and high-quality education, and to close educational achievement gaps.” It provides fair access to courses for low-income students, particularly those living in remote regions of the state.

Today more than 33 percent of Louisiana eighth grade students attend a school that does not offer Algebra I. Of high schools that have a majority of students of color, approximately 20 percent do not provide Algebra II, 25 percent do not provide Chemistry, 70 percent do not provide calculus, and 90 percent do not provide physics.

Through the newly authorized Direct Student Service provision within the federal law, Louisiana can target up to three percent of the state’s total Title I award to provide more money to school systems around the state that have historically struggled to provide access to basic courses and opportunities for students.

The overall share of Title I funds going to school systems does not change under Louisiana’s proposed state plan. However, the plan will prioritize rural, low-income communities in targeting three percent of Title I funds, explicitly for these purposes.

Information about the Direct Student Services provision can be found on page 12 and Appendix C of the LDE’s [second draft framework](#) and page 69 of the [draft state plan](#).

- *Establishment of the metric for determination of District Performance Scores imposed on local school boards*

ESSA does not address district performance scores, nor does it require that states submit for federal review and approval their plans to address district accountability. This is a state decision to be addressed pursuant to Louisiana state law (R.S. 17:10.1), which requires BESE to provide for a statewide system of accountability for school districts based on student achievement. In an email dated March 3, 2016, Ms. Kathy Noel, chair of the state’s Accountability Commission, told commission members that she intends to discuss and consider recommendations relative to district accountability during the commission’s upcoming spring meetings. Those recommendations will be considered by the state board prior to the beginning of the 2017-2018 school year.

- *Establishment of a valid means of addressing student growth at the teacher, school and school district levels*

The Accountability Commission spent a significant portion of its recent meetings discussing the appropriate recognition of growth in the state’s accountability system. The commission ultimately recommended that the school performance score for elementary and middle schools be based 25 percent on growth in order to incent and reward academic growth while guarding against excessive volatility in scores from one year to the next. The precise method of measuring and rewarding growth was discussed extensively in meetings held September 12, October 17, November 1, and December 5, 2016, and January 9, February 8, and February 17, 2017. Materials and recordings from those meetings can be found on the LDE’s website [here](#).

Ms. Noel and LDE Assistant Superintendent Jessica Baghian recently conducted regional accountability meetings for local school systems on March 8, March 13, March 20, and March 21, 2017. These meetings consisted of a detailed [presentation](#) of the proposed growth component and opportunities for school districts to ask questions. Refer to slides 15-19 and 25-26.

- *Establishing a system of awarding points that is aligned with the current A, B, C, D and F grading scale and avoids effectively converting the system into an A or F scale*

As described in the draft framework, draft state plan, and regional accountability meeting presentation, Louisiana will continue to measure school performance using an A, B, C, D, and F grading scale. As schools meet modest increased expectations for achievement and growth over time that enable students to be successful, the distribution of scores will remain relatively constant, with the vast majority of schools being rated B, C, and D, as has been the case since school letter grades were first given. Refer to slides 33-44 of the presentation given at regional accountability meetings for an overview of the proposed plan's overall implications for school ratings.

- *Address coursework and subject matters, especially those that are mandated on local school boards by the State, other than the mere four core academic areas, in the accountability system calculations*

Louisiana's proposed state plan aligns with state law (R.S. 17:24.4), which requires annual measurement of student learning in English language arts, mathematics, science, and social studies. The proposed state plan does not propose to add state testing of additional coursework and subject matters, instead reducing state testing by ensuring that no more than two percent of instruction time during the school year is spent by students taking state tests, and that local school systems also prioritize the streamlining of interim and benchmark tests in order to maximize student learning time.

ESSA does, however, require states to include in their state accountability systems an indicator of school quality or student success. Refer to Challenge 3 and Appendix B in the draft framework and pages 32-33 of the draft state plan for more information. The "Interests and Opportunities" indicator will award points for local school systems that increase student access to a number of courses and activities that support a well-rounded education, including some that are currently required by state law but are not consistently measured, such as arts, foreign languages, and physical activity.

- *Ensure that accountability results are provided before the summer break to provide students, teachers, schools and school boards information on areas of success and areas in need of improvement*

This is an administrative issue and not an issue immediately related to the state's ESSA plan. However, in recent years the LDE has consulted with local superintendents in order to plan for the timing of the administration of assessments and receipt of student results in the next school year. This consultation has included multiple timeline options based on what the state-approved

test vendor determined to be feasible. The Department will continue working with local superintendents to ensure that student results are received as quickly as possible. It is worth noting that obtaining federal approval for Louisiana's ESSA state plan by the beginning of the 2017-2018 school year will enable the LDE to finalize assessment timelines and prevent any unnecessary delays in spring 2018.

My staff and I remain committed to continuing to work with you and local school boards across the state for the benefit of Louisiana's students.

Sincerely,

A handwritten signature in blue ink, appearing to read "John White".

John White
State Superintendent of Education

cc: The Honorable Governor John Bel Edwards
Honorable Members of the State Board of Elementary and Secondary Education



MEMORANDUM

Leadership, Service, and Support for School Boards

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SCOTT M. RICHARD
EXECUTIVE DIRECTOR

TO: Honorable Governor John Bel Edwards
Honorable BESE President and Members
State Superintendent of Education

FR: Scott Richard, LSBA Executive Director 

DATE: March 23, 2017

RE: Louisiana's State Plan – Every Student Succeeds Act
Request to Delay Submission

The Louisiana School Boards Association (LSBA) urges the Board of Elementary and Secondary Education (BESE) and the Louisiana Department of Education (LDOE) to delay submission of the State Every Student Succeeds Act (ESSA) plan in April and utilize the authority to make the submission in September, as afforded in ESSA, in order to ensure that the plan is complete and appropriately addresses the needs of the 700,000+ children attending Louisiana public schools.

There are a number of aspects of the current proposal that present problems for local public school boards and the children in their care that could be resolved during the delay:

- The new option afforded to the LDOE to withhold an additional 3% of federal funds that are intended for local districts and students
- Establishment of the metric for determination of District Performance Scores imposed on local school boards
- Establishment of a valid means of addressing student growth at the teacher, school and school district levels
- Establishing a system of awarding points that is aligned with the current A, B, C, D and F grading scale and avoids effectively converting the system into an A or F scale
- Address coursework and subject matters, especially those that are mandated on local school boards by the State, other than the mere four core academic areas, in the accountability system calculations
- Ensure that accountability results are provided before the summer break to provide students, teachers, schools and school boards information on areas of success and areas in need of improvement.

Just as the State is struggling fiscally, local school boards have, year after year, been called upon to provide a higher and higher percentage of the cost of providing public education. Long gone are the days when the State carried 65% of the fiscal burden, compared to 35% for local districts. Recent financial data shows local school boards carrying about 50% of the costs of providing public education in Louisiana. The proposal to withhold an additional 3% of federal funds from every local school board is, therefore, very troubling.

While local school boards appreciate the notion espoused by Supt. White that the LDOE will redistribute that money, the inevitable fact is the many local school boards, and the children they are tasked with educating, will suffer a net loss of funding through this process. While a few local school boards or charter schools may benefit, that benefit will be at the expense of every other local school board and charter school. The LSBA, therefore, objects to the reservation and diversion of federal funds as provided in the LDOE proposal.

The State plan is supposed to set forth the metrics and the process for the State Accountability System. That necessarily includes the assessment of students, teachers, schools and school districts. However, as of the writing of this letter, the State Accountability Commission has yet to even consider the metrics for establishing District Performance Scores (DPS). Until that decision is made the submission of a State Plan is premature. Again, ESSA gives the State until September, so the State should not rush to file an incomplete plan. The LSBA cannot even speak to its support or objection to the DPS metrics, as those metrics are, to date, unknown. There seems to be a lack of the very stakeholder input that was originally envisioned by ESSA.

Finding a valid means of incorporating student growth into our State Accountability System has been a goal since before the passage of ESSA. Recalling the “bonus points” or “progress points” that were inserted into the System in prior years, without fully vetting those proposals, that system created counter-productive disputes, where districts that had achieved at seemingly high levels found themselves surpassed by districts with lower scores due to the after-the-fact application of “bonus points”. There were ongoing disputes as to how best to calculate and apply bonus points. The Accountability Commission does not appear to have reached consensus on how to incorporate “student growth” that does not under-compensate historically higher performing school districts. Under the current proposed model, a school district that has historically performed as an “A”, could fall to a lower letter grade, even if the DPS letter grade without the growth factor still qualified as an “A”, based solely on the district not showing sufficient “growth”. This would be like giving a student a B because the student made a 97% in the first semester and a 97% in the second semester – thus showed no “growth”. Other interest groups actually objected to the “student growth” model, conceptually, asserting that the use of “student growth” would mislead the public by over-compensating a lower performing school or district. This issue needs more study and consensus. The LSBA objects to moving forward with the proposed plan that does not appropriately address this issue.

The current proposed plan makes dramatic and fundamental changes to the State Accountability System in the awarding of points. The notion that Mastery earns 100 points, but just below Mastery earns 50 points, and Basic earns 50, and just below Basic earns 0 is not a valid means of implementing an A, B, C, D, F grading scale. The proposal is akin to a teacher awarding the following grades to the following students:

Student	Test Score	Letter Grade
1	90	A
2	89	D
3	50	D
4	49	F

The points should be awarded in bands, aligned with the letter grades, if the letter grade system is to remain in place. The proposal establishes a system where there are only 3 possible grades A, D or F, there is no B or C.

There are a number items of coursework or instruction mandated by State law, from bullying, to cell phone security, to cursive writing. None of these items are taken into account when calculating an SPS or a DPS. The LSBA has long worried about the paradox between the State mandating certain coursework or instruction and the State not valuing those matters enough to include them in the State Accountability System. One of the highlights of ESSA was the flexibility afforded to States to include multiple measures, beyond standardized tests scores, in the assessment system for public schools and local school districts. Taking advantage of that flexibility will also show that the State values the mandates imposed on local school boards. The current proposed plan does not take advantage of this key flexibility provision in ESSA.

The current proposal does not remedy the problem that has long existed in Louisiana – the State Accountability System does not provide meaningful feed-back to local school boards in a timely manner. Currently, the State provides results weeks or even months after the beginning of the school year from tests taken back in the prior Spring. Yet, the State expects local school boards to be able to implement changes at those lower performing schools identified after the school year has begun. ACT, one of the most widely utilized standardized tests in the country, provides results within a few weeks of the completion of testing. The underlying purpose of the State Accountability System is to provide local school boards, instructional leaders, teachers and parents with information on whether the students under their charge are meeting academic expectations. Local school boards, instructional leaders, teachers and parents need that information much sooner than the proposed plan will provide.

The LSBA urges that the impacts set forth herein on the State Accountability System should be resolved before the State ESSA Plan is submitted. Louisiana's current education law relies heavily on the State Accountability System and the letter grades awarded. The letter grades drive Superintendent contracts, Charter School authorization and renewal, Voucher eligibility, RSD authority, etc. Moving forward with a State ESSA Plan that fails to address these critical issues is simply bad public policy. ESSA gives Louisiana until September to submit the State Plan. There is no benefit to the State to submit the plan early. As a practical matter, the submission of the State Plan in April, and the time lag awaiting federal approval, does not afford local school boards the ability to make changes to be ready for the 2017-18 school year. Submission in September will afford the opportunity to fully implement the plan for the 2018-19 school year. Just as we would not tell a student to turn in their test early and not take all the time available to them to take the test, we, as a State, should not rush to turn in the State ESSA Plan early. Additionally, as so many laws are tied to the letter grades, there will be a need to align those laws with the new State Accountability System set forth in the State ESSA Plan. Submission in April prevents the opportunity to ensure such alignment.

Therefore, for the reasons set forth herein, the LSBA joins with the overwhelming majority of local Superintendents in urging the delay in submitting the State ESSA Plan to allow for its completion and revision for the betterment of the students relying on public education in Louisiana.

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