March 14, 2017

Mr. Hollis Milton, Superintendent
West Feliciana Parish Public Schools
P.O. Box 1910
St. Francisville, LA 70775

Dear Superintendent Milton:

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.

The Louisiana Department of Education (LDE) has been working with stakeholders to develop Louisiana’s plan for well over a year and has held dozens of 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, superintendent task force meetings, 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.

In 2013, the State Board of Elementary and Secondary Education announced 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. It is thus a priority reflected in the draft ESSA state plan.

Also in 2013, through rules promulgated in Bulletin 111, Section 303, BESE provided for a gradual transition to higher standards and a "two-year baseline" by holding steady the distribution of school letter grades for the 2013-2014 and 2014-2015 school year based on the 2012-2013 distribution. BESE then added the 2015-2016 school year to that transition period. Last spring, through Act 498 of the 2016 Regular Session, the 2016-2017 school year was added to this transition. The release of school letter grades this fall will represent the fourth consecutive year that the Department of Education has held constant the distribution of school letter grades in order to provide for what began as a two-year baseline.

Louisiana will continue to raise expectations for teaching and learning through 2025 in order to provide students with an education that is on par with their peers nationally. Throughout that
time, it is critical that parents, educators, and the public will be provided accurate, timely information about school performance in order to support academic growth and to evaluate the extent to which our state is meeting its goals.

In your letter you cited four issues that you believe warrant further discussion:

1. The total impact of the overall plan
   On September 28, 2016 and again on February 6, 2017, the LDE released draft frameworks that illustrate the total impact of the state’s draft ESSA state plan on local school systems. The frameworks, which contain both summary information and detailed appendices, explain how Louisiana and its school systems will meet the requirements of ESSA address while addressing Louisiana’s main challenges:
   1. Fundamental expectations for students and graduates
   2. Deep struggles for historically disadvantaged students
   3. Fair access to experiences essential for success in school and beyond
   4. A strong educator profession
   5. Persistently struggling schools

   The total impact of the proposed plan, including a complete overview of accountability implications, has also been discussed at recent regional accountability briefings for superintendents and district leadership. Refer to slides 34-44 of the presentation used in these meetings.

2. An in-depth review of the Growth Index Factor in order to better determine an appropriate percentage
   The Accountability Commission has also spent a significant portion of its recent meetings discussing the appropriate recognition of growth in the accountability system and reviewing simulations based on different weights. 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. Materials from the Accountability Commission meetings can be found on the LDE’s website here.

3. Clarity on the Interest and Opportunities Component
   Page 21 of the state’s draft framework and page 32 of the draft state plan presents the timeline by which the LDE will work collaboratively with practitioners, content experts, and other stakeholders to develop and implement the Interests and Opportunities component that meets the ESSA requirement for having a school quality/student success indicator in the state accountability system. This will allow for collection and review of necessary data, piloting the measurements to ensure validity, and assisting school systems in preparing for the new measurement before results become part of the school performance score.

4. Clarity on how Peer Group comparisons will be calculated
   Based on the recommendations of the Accountability Commission, Appendix B of the second draft framework and pages 30-31 of the draft state plan summarize how the growth index will be calculated using a two-step process. As explained in these documents as well as in
Accountability Commission meeting materials, the index will first consider whether students are on track to Mastery and, second, how students’ performance compares to that of their peers. The identification of peers will be consistent with the way in which peers have been identified for purposes of educator evaluations for the past several years. Please refer to slide 17 of the presentation used at regional accountability briefing meetings. My staff and I are happy to discuss with you any specific questions you may have regarding peer group comparisons.

You also inquired about federal title funding. Information about the Direct Student Services option to provide courses and supports to students where they are currently unavailable can be found on page 12 and Appendix C of the second draft framework and page 69 of the draft state plan. The total amount of Title I funds allocated to local school systems remains largely the same from No Child Left Behind to ESSA. As required in ESSA, 100 percent of funds used for Direct Student Services will be awarded to geographically diverse local school systems, with priority given to districts with schools identified as needing comprehensive support.

My staff and I will continue to work diligently with superintendents and other stakeholders to implement a strong plan for the benefit of Louisiana’s students.

Sincerely,

John White
State Superintendent of Education

cc: Ms. Jada Lewis, BESE Member, District 8
ESSA Stakeholder Meetings*

2016 Regional ESSA Meetings:
- June 14, 2016 (Statewide School System Leaders and Educator Associations, Baton Rouge)
- July 26, 2016 (Lafayette)
- July 26, 2016 (Lafayette)
- July 27, 2016 (Pineville)
- July 27, 2016 (Shreveport)
- July 28, 2016 (Monroe)
- July 29, 2016 (Baton Rouge)
- August 1, 2016 (Houma)
- August 2, 2016 (Mandeville)
- August 2, 2016 (New Orleans)
- November 1, 2016 (Bossier)
- November 4, 2016 (New Orleans)
- November 7, 2016 (Opelousas)

Accountability Commission Meetings:
- January 29, 2016
- June 27, 2016
- September 12, 2016
- October 17, 2016
- November 1, 2016
- December 5, 2016
- January 9, 2017
- February 8, 2017
- February 17, 2017

Superintendents’ Advisory Council:
- February 18, 2016
- May 26, 2016
- July 21, 2016
- September 21, 2016
- November 2, 2016
- February 16, 2017

Superintendents’ Task Force:
- February 18, 2016
• September 21, 2016
• November 2, 2016

Regional ESSA Accountability Briefings with Superintendents and Principals:
• March 6, 2017 (Hammond)
• March 8, 2017 (Crowley)
• March 13, 2017 (Bossier City)
• March 20, 2017 (Monroe)
• March 21, 2017 (Gonzales)

School System Supervisor Collaboration Meetings:
• January 31, 2017 (Harvey)
• February 2, 2017 (Baton Rouge)
• February 7, 2017 (Ruston)
• February 9, 2017 (Lafayette)

*This above listing is not an exhaustive list of stakeholder meetings regarding the development of Louisiana’s draft ESSA state plan. Additional meetings are listed at www.louisianabelieves.com/essa, and the LDE has held numerous individual meetings with school system leaders and other stakeholders as this plan has been developed.
March 10, 2017

Superintendent John White  
Louisiana Department of Education  
P. O. Box 94064  
Baton Rouge, LA  70802-9064

Dear Mr. White:

As Superintendent of the West Feliciana Parish School District, I feel very strongly that the Every Student Succeeds Act Plan for the State of Louisiana needs revisions before it is submitted for consideration. I am formally requesting that the ESSA Plan submission for the State of Louisiana be made in September instead of April. The specific components we would like to address include:

1) The total impact of the overall plan.  
2) An in-depth review of the Growth Index Factor in order to better determine an appropriate percentage.  
3) Clarity on the Interest and Opportunities Component.  
4) Clarity on how Peer Group comparisons will be calculated.

The September submission will provide our State the ability to continue utilizing existing accountability formulas while we compile actual student data aligned to the new set of expectations. ESSA allows for assessment flexibility and accumulation of two (2) years of data until implementation. We still advocate pursuing the 2025 of Mastery being the mark of proficiency.

Additionally, there will be significant reductions in federal funding for title programs impacting local plans. Therefore, we request the department rely on the required 7% reservation and not exercise the optional 3% set aside.

Sincerely,

Hollis Milton  
Superintendent

HGM:jh  
17-024