



Comments and Questions to the Draft ESSA State Plan
Prepared by the Louisiana Department of Education

March 17, 2017

Submission Date

Two-thirds of all states plan to submit ESSA plans in September 2017. Given the importance and complexity of the policy issues being addressed and the limited time the public has had to review and comment on the second Framework and Draft Plan, we recommend that the Louisiana Department of Education postpone the submission of its ESSA plan to the U.S. Department of Education until September.

Addressing Deep Struggles for Historically Disadvantaged Students

1. Louisiana's policymakers, educators, and school leaders have been working hard to help all of our students have the quality teachers, high expectations, and support they need to graduate from high school ready to succeed in college and careers. Over the past several years we have seen great signs of progress in ACT scores, high school graduation rates, and the number of students entering and succeeding in postsecondary education. But unfortunately, too many of our students don't have access to the high-quality education they need. This is particularly true for low-income students and students of color. Page 6 of the proposed Framework graphically shows the percentages of Louisiana students scoring Mastery or above on ELA and math assessments for grades 3-8 from 2012-2016. These achievement gaps are very concerning, particularly in light of the millions of federal dollars that were awarded to Louisiana over the past decade and a half that were intended to hold schools accountable for the academic outcomes of *all* students.
2. It is urgent that we work to close the achievement gap. By 2020 – in just three years – 56% of all job openings in Louisiana will require some form of postsecondary education.¹ Yet, nearly three out of four adults in Louisiana do not have a postsecondary credential.² At least 100,000 of Louisiana citizens ages 18 to 24 do not have at least a high school diploma, ranking the state 45th in the U.S. for 18 to 24 year olds with a high school diploma or equivalent.³ This skills gap makes it increasingly difficult for businesses to find qualified

¹ Georgetown University Center on Education and the Workforce. "Recovery: Job Growth and Educational Requirements through 2010."

² Kennedy & Company Education Strategies LLC. "Narrowing the Gaps in Louisiana's Adult Learner and Transfer Market. 2015

³ Louisiana Community & Technical College System, WorkReady U. "Moving Adult Education Forward."

workers in high-demand occupations. Clearly, we need to raise the achievement of *all* of our students so that they can help us to address the increasing demand for skilled workers.

3. We support the department’s recommendation for the inclusion of “a calculation of individual student growth for all students” in the accountability formulas as a way to recognize and incentivize growth for all children, but Louisiana clearly needs more vigorous and aggressive policies and strategies to narrow the persistent and widening achievement gaps among student subgroups. The Framework appears to omit subgroup performance among the goals that superintendents, principals, and educators must annually determine. In addition, it is not clear whether the state will include subgroup performance results in its detailed reports for school system leaders and principals. **We recommend that subgroup performance data be included in state, district, and school performance goals, as well as in detail performance reports for school leaders.**
4. The axiom “what gets measured gets done” is as much applicable to education as it is in business. While the inclusion of an accountability indicator to promote the expansion of experiences that develop “well-rounded and enriching interests and habits” is a positive step, it is equally and perhaps more important that students of color, economically disadvantaged students, and students with disabilities learn and be as prepared to succeed beyond high school as all other students. If the state’s ESSA plan is intended to address the achievement gap problem, we question why the framework excludes subgroup performance as an indicator in school and district performance score formulas. **We strongly urge Louisiana to either include achievement gap as a factor in school performance score formulas or adopt adequately-funded strategies and policies that incentivize schools to focus on students most in need.** One policy option that deserves exploring as a means of narrowing achievement gaps is the inclusion of specific gap reduction and/or growth factors for “high needs students” within the 25% growth index.
5. The framework provides for “targeted support” grants of up to \$50,000 to be made by the state to schools achieving persistently low marks in subgroup performance. We believe that the \$50,000 amount is grossly inadequate considering the magnitude and challenge of these problems and the solutions needed to effectively address them. **We recommend that the state substantially increase the dollar amount of targeted support grants.**

Fair Access to Experiences Essential for Success

1. We support the phased-in inclusion of an “Interests and Opportunities” indicator in the accountability formula.
2. We support the state-level set-aside of 3% of Title I allocations to fund Direct Student Services grants to local school systems for students to gain access to academic courses, credentials, and services that are not currently available at schools.

School Discipline

It is a fact that Louisiana has a higher proportion of students who experience exclusionary discipline. According to March 21, 2014 Data Snapshots of Civil Rights Data Collection, among

male students, Louisiana exceeds the national average across nearly all seven racial/ethnic categories. The one ethnic group in which Louisiana does not exceed the national average is African American males. However, at a rate of 18 percent, black males in Louisiana experience out-of-school suspensions at the highest rate among other ethnic groups in the state. Nearly one in five black males are likely to be suspended, a rate that is nearly double the rate of white male students. As was once reported by The Times Picayune, “Black children made up 44% of the public student body but received 63% of in-school suspension, 67 percent of out-of-school suspensions, and 68 percent of expulsions.”

Data also shows that disabled students are twice as likely to receive out-of-school suspensions as their non-disabled counterparts.

The state’s ESSA Framework states that “schools exhibiting excessive-out-of-school discipline and/or chronic absenteeism will be considered for comprehensive support,” thus triggering the requirement for intervention and improvement plans that must be approved by the state. While this is a positive step, **we recommend that:**

1. **All schools be required to set and report goals to bring their suspension rates below the national average.**
2. **LDOE and local school districts publicly report aggregated and disaggregated data on school discipline and student absenteeism in formats that the public, parents in particular, can easily understand.**

Support for Persistently Struggling Schools

1. Page 15 of the Framework mentions the challenge of persistently struggling schools. The Framework notes (but does name) 83 schools in Louisiana in which either no more than 12% of students have demonstrated Mastery or no more than two-thirds of students have graduated in any of the last three years. The Framework further states that African American students make up more than 75% of the population of these schools as compared to slightly more than 40% of African American enrollment statewide.

The Framework proposes the use of 7% of the state’s Title I funds to fund multi-year intervention and improvement plans to be prepared by these schools, but the Framework does not provide a dollar amount of the funds. The adequacy of total available funding cannot be judged or assessed without a better appreciation of the scope of this challenge.

We recommend that the state publicly release the following information on all schools targeted for comprehensive support:

- Name and location of each school
- Grade levels
- Letter grades over the past three years
- Enrollment by ethnicity and subgroup
- Cohort rates by subgroup
- Percentage of students on Free and Reduced Price Lunch

- Number and rate of in-school and out-of-school suspensions and expulsions by race and gender
- Number or percentage of teachers who are not qualified or certified in Algebra II and other critical college-readiness courses
- Number or percentage of students who do not have access to dual enrollment coursework

The Framework gives these comprehensive support schools four years to improve their “F” ratings or be eligible for inclusion in the Recovery School District. With so many billions of taxpayers’ dollars already spent and still so many achievement miles to go, we question why the state will allow these schools to continue to fail for so long before stepping in to take stronger turnaround action. **We urge the state to *step up the pace of fulfilling the promise of success for all public school children, particularly children most in need.***

2. **We urge the Louisiana Department of Education to publicly present its internal organizational plan for the administration of ESSA, including the department’s staffing expertise and capacity to effectively administer and monitor grants awarded under this section and all other Titles of ESSA.**
3. The state’s five largest school districts, Caddo, East Baton Rouge, Jefferson, Lafayette, and St. Tammany Parish, account for 29.3% of the state’s total graduating cohort.⁴ All but one of these districts (St. Tammany) has a cohort rate below the statewide rate. Together, these districts comprise 27.6% of the 725,606 students that were enrolled in the state’s public schools as of October 1, 2015 and 30.8 percent of the state’s total African-American student enrollment.⁵
 - For the class of 2014, African-American students in Louisiana public schools had a statewide cohort graduation rate of 71.4 percent—11.3 percentage points below the graduation rate for White students.⁶
 - Among African-American male students in Louisiana, the high school graduation rate is 64.1%, a gain of nearly 4 percentage points over the prior year, but still 13.4 percentage points below the statewide rate for all students.⁷

We recommend that the state include a comprehensive, graduation rate-focused funding strategy within the ESSA plan to address the low-graduation rate of African American students in large districts. We further recommend that Louisiana study the GradNation State Activation models and other promising practices in developing a state-level strategy for this purpose. http://www.americaspromise.org/gradnation-state-activation-initiative?_ga=1.99832862.1059866817.1478199122

⁴ Civic Enterprises and Everybody Graduated Center at the School of Education at Johns Hopkins University. *Building a Grad National Annual Update 2015.*

⁵ <http://www.louisianabelieves.com/resources/library/enrollment-counts>.

<http://www.louisianabelieves.com/resources/library/high-school-and-college-and-career-data-center>.

⁶ Louisiana Department of Education.

⁷ Ibid.

Family Engagement

1. The Framework states that the state will provide parents various reports on student, school and district performance and growth, as well as reports on teacher effectiveness and student access to “whole child” interests and opportunities. However, the Framework does not say “how” or by what means the state will provide this information.
2. **We strongly urge the state to develop and employ a more grassroots, aggressive community outreach and information campaign than has typically been done in communicating student test results and school performance results.**
3. **We recommend that the reports provided to parents include disaggregated data on subgroup performance in a format that is easily and clearly understood.**
4. **We further recommend that the state develop a communication toolkit for families and the general public that includes flyers, brochures, and videos that explain key elements of both the draft ESSA plan and the final plan that is ultimately approved by the U.S. Department of Education.**

Data Request

On November 3, 2016 we requested that the Louisiana Department of Education provide a breakdown of federal No Child Left Behind (NCLB) funding to Louisiana over the past five years, including (a) the amounts held by the state, (b) the amounts distributed to school districts, and (c) a categorical breakdown of how those funds were spent. **As of today, the LDOE has not provided this information.** Appendix C of the Framework includes a comparison of NCLB and ESSA funding by Title sources, but the detail that we requested still has not been provided.

We respectfully request the department’s submission of the NCLB data stated in our November 3, 2016 request, and that this information be provided in a format that is easily accessible and understood.