



LOUISIANA DEPARTMENT OF EDUCATION

March 28, 2017

Dr. Cade Brumley, Superintendent
DeSoto Parish School Board
201 Crosby Street
Mansfield, LA 71052

Dear Superintendent Brumley:

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 several concerns regarding the proposed state plan. What follows are responses to each concern.

- *Lack of clarity in the field of educators on calculation methodology for the growth formula and whether consideration should be made on a gradual transition toward the end-game growth percentages*

Louisiana Believes.

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, which a gradual phase-in would have produced. 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 system leaders and principals on March 8, March 13, March 20, and March 21, 2017. These meetings, attended by approximately 300 [educational leaders](#) across the state, 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.

- *Whether the 5% "Interest & Opportunities" segment should come from the "ACT/WorkKeys" slice instead of the "Cohort Graduation Rate" – considering student graduation is an ultimate goal, the unknown surrounding this component, potential for subjectivity, and the potential impact on staffing, scheduling, and academic opportunity costs for shifting priority*

The Interests and Opportunities, which will satisfy the requirement in ESSA that states include a school quality/student success indicator in their accountability systems, is intended to motivate and reward schools for providing students with access to rigorous courses and enriching activities that promote a well-rounded education. Those courses and activities include the visual and performing arts, foreign languages, technology consistent with recommended standards, participation in co-curricular activities, and courses leading to college credit. 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 requirements of ESSA. Minimizing subjectivity and using data already collected will certainly be a priority. This timeline 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 in 2019-2020. The timeline will also aid school leaders in planning for any changes they feel are needed related to staffing, scheduling, and use of funds, in order to meet expectations in these areas.

As for the needed adjustments to school performance score formulas to make room for this component, the current high school graduation rate component is reduced in the proposed state plan in an effort to balance out the most heavily weighted cohort of students in the current formula. A high school's score is currently heavily weighted on the seniors from the year prior – graduation rate (25 percent) and graduation index (25 percent), while the ACT/WorkKeys is weighted on current seniors (25 percent) and End of Course test results (25 percent) of students who are typically freshmen and sophomores. Many stakeholders have expressed their agreement

in more evenly distributing the high school measurements across cohorts of students, but we are open to further discussion of this with you and BESE members prior to the indicator being incorporated in 2019-2020.

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

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](#).

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: Dr. Gary Jones, BESE President, District 5
Mr. Tony Davis, BESE District 4
Mr. Hollis Milton, LASS President
Mrs. Kelli Joseph, LASS Secretary
Mrs. Kathy Noel, DeSoto Parish Director of Student Learning



DeSoto Parish School Board

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DR. CADE BRUMLEY
Superintendent

17 March 2017

RE: ESSA Submission

Louisiana Superintendent John White,

I assume this is a strenuous time in your work with varying angles surrounding the Every Student Succeeds Act (ESSA). However, it's also a time of great opportunity. ESSA provides states greater flexibility to craft thoughtful policy leveraging talents, contexts, and nuances to prepare Louisiana students for a lifetime of success in a global society. With that opportunity comes responsibility to ensure our plan is right and, I hope, where consensus is found among key stakeholder groups. Public School Superintendents are one of the key groups and I serve as an officer of that group.

Despite your caravanning around the state, there remains unrest and confusion around parts of the plan, including the accountability aspect. My district's Director of Student Learning, Kathy Noel, chaired the Accountability Commission. She kept me informed and engaged in a seemingly unwinnable task. She gave countless hours of her time and our resource. Overall, the Accountability Commission engaged in rich, productive dialogue. Their work prompted positive gains, reflected in the ESSA plan, such as: 1. elimination of bonus point volatility; 2. solidifying a need to have student/school results returned sooner for academic decision-making; 3. questing for reliability on student "proficiency" ensures Louisiana students have academic comparability across the nation; and 4. more appropriate EOC assessments.

In terms of accountability, I have these concerns: 1. lack of clarity in the field of educators on calculation methodology for the growth formula; 2. rather consideration should be made on a gradual transition toward the end-game growth percentages; 3. whether the 5% "Interest & Opportunities" segment should come from the "ACT/WorkKeys" slice instead of the "Cohort Graduation Rate" – considering student graduation is an ultimate goal; 4. the unknown surrounding the components of "Interests and Opportunities" and potential impact on staffing, scheduling, and academic opportunity costs for shifting priority; 5. potential for "Interest and Opportunities" subjectivity; 6. ensuring appropriate calculation methodology exists for developmental appropriateness in the growth formula.

Also, I'm concerned about the LADoE exercising the optional 3% holdout of Title 1. I realize the funds will return to districts through a competitive process. In DeSoto, we already braid numerous funds, including Title 1, to implement the components of our strategic plan – this would be an additional exercise on our finite staff. Beyond that, with increasing costs and stagnant revenues (a 40% revenue decline in my district over 5 years), we are already doing more with less as evidenced by our academic outcomes. Many districts will not be able to tolerate a loss of these funds.

I consider myself an independent thinker, informed by all sides and not held captive to any. In some areas, I concur with the most traditional of educators; in others, I agree with the most emboldened "reformers." I simply want what's best for every child. Obviously, as an educator from a traditional public system, I must advocate for my system – DeSoto Parish – above all else. I hold a contract with the public trust of my communities. Moreover, I must represent the majority interest of Public Superintendents given my capacity within the organization.

It would be judicious, especially given the concerns of a super-majority of Louisiana Superintendents holding the largest portion of Louisiana students under their care, to make sure these issues (and potentially others) are addressed. We have an awesome opportunity to craft an advancing, equitable agenda. Let's not lose a war just to win a battle.

Cade Brumley, Ed.D.
Superintendent