



# LOUISIANA DEPARTMENT OF EDUCATION

March 27, 2017

Felecia Gomez-Walker, Superintendent  
St. Charles Parish Public Schools  
13855 River Road  
Luling, LA 70070

Dear Superintendent Gomez-Walker:

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](http://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

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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. Overall impact of the 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. Growth index factor to 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. Details relative to 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. Calculation of peer group comparisons*

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,

A handwritten signature in blue ink, appearing to read "John White", written in a cursive style.

John White  
State Superintendent of Education

cc: Ms. Kira Orange Jones, BESE Member, District 2

## **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](http://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.

Dear Superintendent White,

As Superintendent of the St. Charles Parish Public School System, I am advocating to delay the submission of the ESSA Plan for the State of Louisiana until September. I feel strongly that the Every Student Succeeds Act (ESSA) plan for the State of Louisiana has not been fully developed and should not be submitted on April 3, 2017. Specific components that require additional review and development are the following:

- overall impact of the plan
- growth index factor to determine an appropriate percentage
- details relative to the interest and opportunities component
- calculation of peer group comparisons

The September submission will provide our State the ability to continue utilizing existing accountability formulas while compiling 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. This can be accomplished while continuing to advocate for the 2025 of Mastery being the mark of proficiency.

Rationale being communicated for the April submission is that it is in the best interest of teachers and administrators to have the plan approved prior to the beginning of the school year. This sense of urgency is perplexing since for the past several years, school systems have been operating in an environment of uncertainty, constant change and from a posture from the LDOE of "assembling the plane while in flight." Seeking approval in September will not cause teachers or administrators of school systems to waiver in their commitment or passion to meet the needs of all students. School systems have remained committed when Student Learning Targets had to be adjusted at midyear and when there was a transition from CCSS to Louisiana Standards. School systems have adjusted throughout the annual changes relative to testing and the accountability system. They have remained focused in spite of ELA and math practice tests and LEAP Test Administration Manuals not being accessible until three weeks prior to testing. Teachers implementing the new science standards will move forward with implementation even though instructional resources have not been assessed and identified. Yes, school systems will adjust because they are dedicated and have had ample experience in adjusting while always keeping the best interest of students in the forefront of decision making.

Additionally, significant reductions in overall federal funding are anticipated. The State Department of Education has announced that it intends to exercise the optional 3% set aside in addition to the required 7% funding. I respectfully request that the optional 3% not be withheld from local districts to be distributed to districts with struggling schools. While some districts may not have schools identified as struggling, all districts have students that need extra support and intervention. This 3% funding is needed to support those students in each district. By virtue of the way Title funds are distributed, schools with high poverty rates already receive additional funding.

As Superintendent and an educator in Louisiana for over forty (40) years, I respectfully request that you acknowledge the reservations expressed by those in leadership positions throughout Louisiana and consider the request to delay the ESSA plan submission.

Sincerely,

*Felecia Gomez-Walker*

Superintendent

St. Charles Parish Public Schools