



MEMORANDUM

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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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