March 24, 2017

Dr. Don Coker Superintendent
Ouachita Parish Schools
100 Bry Street
Monroe, LA 71201

Dear Superintendent Coker:

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. A new application has been released by the USDOE.
On March 13, 2017, U.S. Secretary of Education Betsy DeVos released guidance to state education agencies regarding the submission of state plans, including options relative to application templates that may be used. Louisiana's draft state plan conforms to this guidance.

2. Program guidelines have not been released by the USDOE.
A full listing of ESSA guidance issued by USDOE can be found here.

3. No meaningful stakeholder input is reflective in the proposed Louisiana plan
Detailed information on ESSA stakeholder consultation can be found on the LDE's website at www.louisianabelieves.com/essa. The attached summary lists a number of meetings held with school system leaders as well as state advisory council meetings that include representatives from local school systems. A more expansive list outlining consultation with diverse stakeholders, including but not limited to advocacy organizations, civil rights groups, parents, professional associations, post-secondary education representatives, and business leaders, is attached.

4. Comprehensive simulations of how the various accountability components impact the school and district's performance should be shared with stakeholders. A transparent explanation given for each and feedback should be considered for modifying the plan (simulations to include, but no limited to…growth index factor, interest and opportunities, peer group comparisons, ACT and Workkeys points, grades and subjects tested)
Total Impact: 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.

Growth Index Factor: 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.

Interests and Opportunities: 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.

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.

ACT and WorkKeys: Please refer to slide 27 of the presentation used at regional accountability briefing meetings.

Grades and Subjects Tested: Louisiana will continue to follow federal and state laws with regard to grades and subjects tested. Please refer to La. R.S. 17:24.4(F)(1)(c), which states:

> Standards-based assessments in English language arts, mathematics, science, and social studies based on state content standards and rigorous student achievement standards set with reference to test scores of students of the same grade level nationally shall be implemented by the State Board of Elementary and Secondary Education. Such tests shall be administered, at a minimum, in grades three through eleven.

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: Dr. Gary Jones, BESE Member, District 5

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.

OUACHITA PARISH SCHOOLS
Building Bridges to the Future

100 Bry Street ◦ Monroe, Louisiana 71201 ◦ Phone: (318) 432-5000 ◦ www.opsb.net

Don Coker, Ed.D.
Superintendent

coker@opsb.net
318-432-5204

March 20, 2017

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

Dear Superintendent White:

As Superintendent of the Ouachita Parish School System, my team and I constantly work to improve the quality of education afforded the students in Ouachita Parish. With that in mind, we also work daily to build morale among teachers and students. The constant state of change creates uncertainty, which heightens the stress level of educators and our students, therefore; negatively impacting the school climate. I would ask that you please consider delaying the submission of the Louisiana Every Student Succeeds Act plan.

I offer the following for consideration as you deliberate delaying the Louisiana ESSA plan:

1. A new application has been released by the USDOE.
2. Program guidelines have not been released by the USDOE.
3. No meaningful stakeholder input is reflective in the proposed Louisiana Plan (*The plan is being presented to principals in our region today, March 20th*).
4. Comprehensive simulations of how the various accountability components impact the school district's performance should be shared with stakeholders. A transparent explanation given for each and feedback should be considered for modifying the plan (simulations to include, but not limited to ...growth index factor, interest and opportunities, peer group comparisons, ACT and Workkeys points, grades and subjects tested).

Additionally, the proposed 3% Title I set aside reduction will have a negative impact on services provided to my most at-risk students.

The September submission will allow our State the ability to slow down, include stakeholders in decisions, run requested simulations and modify components based on results. This will also give a two-year period of consistency that will reassure our educators and reduce the level of stress of educators

and students. This will reestablish a more positive school climate and confidence in the plan for success. Thank you for your reconsideration of extending the Louisiana Every Student Succeeds plan.

Respectfully yours,

Don Coker

Don Coker, Ed.D.
Superintendent

EC: Tony Davis
Gary Jones
Doris Voitier
Donald Songy
J Rogers Pope
Hollis Milton
Cade Brumley