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State of Louisiana

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John White
Superintendent of Education
Louisiana Department of Education
1201 North Third Street
Baton Rouge, LA 70802-5243

Dear Superintendent White:

Thank you for submitting the Louisiana Department of Education's *Every Student Succeeds Act* (ESSA) state plan to me for review as required by federal law. I believe that, for every state, ESSA is an opportunity for stakeholders to coalesce around an innovative vision for their education system.

Unfortunately, I believe the state plan you provided represents an incomplete vision for Louisiana.

Stakeholder Engagement

The voices of Louisiana's teachers, principals, superintendents, school boards, parents, business community, civil rights community and parishes must shape the ESSA state plan. You have provided a list of meetings where you and representatives from these organizations participated in listening sessions.

However, meaningful engagement under ESSA requires more than listening. It requires compromise and a reflection of their priorities in Louisiana's state plan. Stakeholders have indicated to me that this has not yet occurred.

Ultimately, Louisiana's state plan should not reflect your vision or mine – it should reflect the vision of individuals that make our education system work every day. Until their vision is reflected, Louisiana's state plan is not ready for submission to the U.S. Department of Education.

Assessments

No Child Left Behind ushered in an era of assessment proliferation in Louisiana. ESSA moves away from this model, but the state plan you provided does not. Testing frequency reduction is not substantively addressed. The Louisiana Department of Education and my office should engage parishes and schools in a conversation about the state of assessments in our communities and strategies to reduce their burden on students and educators.

Louisiana must not submit a plan that locks in the status quo on assessment and fails to take full advantage of new innovative flexibility to reduce testing in ESSA, including the substitution of the ACT for federally-mandated assessments and leveraging federal funds for statewide assessment reduction.

Accountability Determinations Timing

The U.S. Department of Education granted states flexibility to collect two years of accountability data before issuing grades for schools. Yet, the plan you provided fails to take advantage of this flexibility that your federal advocacy association, the Council of Chief State School Officers, helped secure for states.

We have an obligation to ensure that our system for measuring schools is effective, accurate and fair. Louisiana should follow the lead of other states that plan to pilot accountability systems for a year before determining the success or failure of schools.

School Quality and Student Success Indicator

ESSA's move away from the punitive, narrow federal accountability of the past includes a shift from metrics narrowly focused on test scores to a more holistic measurement of a school's performance through a new school quality indicator. The state plan you provided identifies "Interests and Opportunities" as the school quality indicator for all schools, but it does not include specific metrics that will be included under this indicator.

This information is pertinent to understanding how accountability systems will ultimately grade schools. Its absence effectively renders the state plan you provided incomplete.

Set-Asides for Student Services & School Improvement

Louisiana schools rely on every dollar of their ESSA Title I allocation. The state plan you provided proposes reducing each parish's allocation to make our neediest schools compete for these dollars for direct student services. This set aside will impact critical programs in every parish and it is not necessary. The state can utilize the required 7% Title I reservation for school improvement (approximately \$20 million annually) to provide direct student services to our neediest schools.

The state plan you provided also appears to rely on the ineffective improvement models previously utilized by the state, instead of relying on the innovative possibilities ESSA provides to Louisiana. Before the submission of the state plan, stakeholders must engage in a discussion with the Louisiana Department of Education and my office to ensure the 7% Title I reservation for school improvement will be leveraged to boldly address performance issues in our public schools.

Transparency for Louisiana's Communities

Every parent, teacher and school deserves to understand the ESSA state plan being submitted to the U.S. Department of Education. Louisiana has designed an education system that provides clear, understandable information to families and communities about the

performance of their students, classrooms, schools and parishes. The state plan you provided does not prioritize clarity or simplicity of understanding.

State departments of education, like the Illinois State Board of Education, have partnered with stakeholder groups to develop “reader’s guides” for communities to understand ESSA state plans before they are submitted. Before either of us can move forward with the submission of the state plan, Louisiana must undertake a similar effort to ensure that every individual connected to our schools has that same opportunity.

Conclusion

More than 34 states are electing to take every moment the federal government has granted them to develop their state plans by submitting on September 18, 2017, instead of the early submission deadline of April 3, 2017. I believe that number will grow.

This week, your chief state school officer colleagues in Montana and Ohio chose to press pause on early submission due to their state plan being incomplete or due to the need for more stakeholder engagement. They both used the recent Congressional repeal of federal ESSA regulations as an opportunity to take more than five extra months and make certain their plans are excellent.

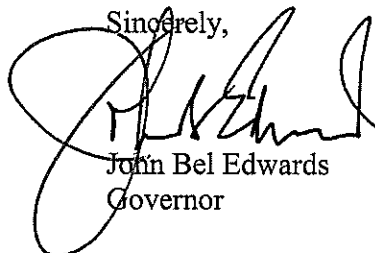
I urge you to follow their lead.

The plan you provided is in critical need of additional information and the inclusion of stakeholder priorities. It is not just one stakeholder group that believes their needs are not being met by the existing state plan, it is the overwhelming majority. Every stakeholder represented on Louisiana’s ESSA Advisory Council believes we need more time. Those not represented on the Council agree.

I pledge to continue working with you between now and September 18 to ensure that we develop an ESSA state plan that every Louisianan can be proud of and to ensure buy-in from communities across our great state.

The future of Louisiana’s education system cannot be rushed. If there is even one educator or parent who believes their voice has not been heard, should we not take more time to ensure they will be?

I believe we should. And I hope you agree.

Sincerely,

John Bel Edwards
Governor