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Shan N. Davis Executive Director

Cade Brumley State Superintendent

STATE BOARD of ELEMENTARY and SECONDARY EDUCATION P.O. Box 94064, Capitol Station, Baton Rouge, LA 70804-9064 · PHONE: 225-342-5840 · FAX: 225-342-5843

October 11, 2023

Dear Chairman Fields and Chairman Harris,

A majority of the Board of Elementary & Secondary Education (BESE) Members voted on Tuesday, October 10, 2023 to approve final adoption of the revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §717. Reports of High School Credit, §2321. Appeals and Eligibility Requirements, and §2322. Senior Projects. This Notice of Intent was published on pages 1299-1303 of the July 20, 2023, issue of the *Louisiana Register*. Attached you will find a Summary of Public Comment and Agency Response (SPCAR) prepared by BESE and another one from the Louisiana Department of Education.

Dr. Brumley is not been supportive of the graduation appeals process. However, a majority of BESE enthusiastically supports the work.

Tests are a good measure of how we are doing overall as a state, but they are not a perfect measure. The policy will allow students to appeal the standardized testing component of the high school graduation requirements. Students must take the standardized test a second time after participating in 30 hours of intervention, must demonstrate employability knowledge and skills, must demonstrate their knowledge of the content for the exams not passed via a portfolio, and must be connected to a career counselor in order to be eligible. More details about the appeals process are available in the attached document.

Only eight states in our nation require a certain score on a standardized test to graduate from high school. Of those, Louisiana is the only state that did not yet have an appeal policy similar to this one in place. The Texas Legislature made their appeal process permanent with a unanimous vote due to the overwhelming positive employment outcomes data for their appeal process graduates compared to non-graduates.

I have served as a high school principal since July 2020. During this time, I have examined hundreds of student transcripts. What I have found is that while the standardized test graduation requirement has driven improvement and higher standards for most of our students, it is an artificial barrier to a productive future for some students.

The intent of this new policy is to create targeted support and interventions for our students who struggle with standardized testing. Historically, the only option for educators was to give students who had not met the "grad test" the same test repeatedly. I have seen firsthand transcripts of students who have taken the same test nine times. **This over testing is unacceptable and counterproductive.** Our schools need to pivot to focus on meeting the needs of students to support them in success after high schools. This policy revision makes that possible.

All of this became clear to me with one of my students last year. She had earned all the necessary Carnegie units to graduate, passed three exams in her credential area, completed 400 hours of industry experience, demonstrated competency on a national industry skills assessment, and successfully completed enough dual enrollment credits to earn a technical diploma from South Louisiana Community College. However, she was not eligible to graduate because she had not passed the Biology or United States History tests. What made this even more frustrating is that the U.S. History test is known to be

problematic and is being phased out. In addition to all this student had accomplished, she also demonstrated the task commitment and resiliency employers are looking for in employees. When her peers were trying to avoid the cleaning tasks in the culinary program, she was on the floor scrubbing a grease trap.

God gives everyone different gifts. My mission in life is to help people use their gifts to make our communities better. The graduation testing requirement stands in the way of some students being able to put their gifts to use when they are denied a diploma. My hope is that you will see this issue the way I do and stand with me and others by working to codify it in state statute during the next legislative session. Passing standardized tests is rarely required in adulthood and should not be the barrier for students to gainful employment.

Sincerely,

Dr. Holly Boff

President Louisiana State Board of Elementary and Secondary Education

EXCELL Appeal Process Policy Brief

Requirements

Per Bulletin 741, students must meet the standard assessment requirements to be eligible for graduation by meeting the established threshold in the following exams:

- English I or English II
- Algebra I or Geometry
- Biology or US History (incoming freshman prior to 2024-2025)
- Biology or Civics (incoming freshmen beginning 2024-2025)

This requirement has historically excluded students from graduating who, despite having mastered the content, struggle with the mechanics of test-taking.

The EXCELL Appeals Process allows eligible students to have the option to appeal the standard assessment requirement. Students may not file an appeal until their senior year, and must meet the requirements described below.

Students who appeal must	For students who appeal, schools must
1) earn all Carnegie Units required for either the TOPS University Diploma or Career Diploma.	1) provide appropriate academic support in all subjects for which the standard assessment requirement was not achieved and 30 hours of required remedial or co-requisite instruction to include a retake of the LEAP 2025 exam in which the standard assessment requirement was not achieved.
 2) demonstrate evidence of content proficiency. This requirement may be achieved by either - meeting the standard assessment requirement within an assessment pair - or - completing a portfolio of work that meets the content proficiency requirement, as measured by the LDOE standardized rubric for both LEAP 2025 courses in the assessment pairs in which the standard assessment requirement was not fulfilled. 	2) provide dropout prevention and mentoring services , based on proven strategies to retain and graduate at-risk students. The LDOE shall make available to LEAs a list of strategies as well as technical assistance needed to offer students such services.
 3) demonstrate evidence of employability. This requirement may be achieved by demonstrating one of the following: workforce readiness by earning a National Career Readiness Certificate through a score of Silver or higher on the ACT WorkKeys - or - post-secondary training pursuit by eligibility for a TOPS Tech award - or - mastery of specific employability skills by earning a graduation-qualifying, industry-based credential regardless of the student's diploma pathway 	3) schedule a meeting to determine eligibility for additional local training and/or workforce guidance with the Workforce Innovations Opportunities Act Provider, Vocational Rehabilitation Services Provider, or other local career support agency and its affiliated providers.

EXCELL Appeals Process (continued)

National Research

- Louisiana is one of only 8 states (New York, Virginia, Florida, Illinois, Massachusetts, Texas and Wyoming) that has a state standardized test score requirement for graduation.
- All of these other states have alternative testing requirements and/or appeals processes for graduation. For example, Texas allows students to appeal the assessment requirement by completing a standards-aligned portfolio.

Economic Research

- Data from the U.S. Bureau of Labor Statistics reveal that only 41.9 percent of high school dropouts are engaged in work or looking for work compared to 69.2 percent of high school graduates.
- High school students in Texas who graduated through the state appeal process have employment rates that are statistically indistinguishable from that of a typical high school graduate.
- The assumption is that Louisiana can expect similar employment outcomes for students who graduate using this new appeals process. The median weekly wage of a high school dropout is \$626 compared to \$809 for an individual with a high school diploma.
- Additionally, because the appeal has an employability component, we can expect a greater number of students graduating with an industry-based credential that is aligned with regional and statewide workforce needs.

Safeguards & Accountability

Based on COVID-era data, it is estimated that less than 5% of students in Louisiana will graduate through the appeals process. If a school graduates more than 3% of their senior cohort through the appeals process, the school will be subject to an audit by the Louisiana Department of Education. If the initial audit yields discrepancies in the implementation of the appeals process, the State Superintendent of Education may be the final authorizer for the respective school site the following year.

Statewide Impact

Louisiana is among the highest for disconnected youth rates in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. BESE anticipates that with the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth. Because students who appeal will graduate with both a high school diploma and demonstrated employability as part of the process, BESE expects more young people to be employed or enrolled upon exiting the K-12 system.

Louisiana continues to value standardized assessments for the purpose of driving improvement in educational outcomes, revealing disparities, and designing strategic interventions. BESE recognizes, however, that a superficial cut score should not determine an individual's post-secondary trajectory.

The Louisiana Board of Elementary and Secondary Education is committed to leading on, seeking out, and supporting equitable solutions to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

ATTACHMENT #2

Copy of the Notice of Intent

Education, Box 94064, Capitol Station, Baton Rouge, LA 70804-9064. Written comments may also be hand delivered to Shan Davis, Executive Director, Board of Elementary and Secondary Education, Suite 5-190, 1201 North Third Street, Baton Rouge, LA 70802 and must be date stamped by the BESE office on the date received. Public comments must be dated and include the original signature of the person submitting the comments.

Shan N. Davis **Executive Director**

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES RULE TITLE: Bulletin 140—Louisiana Early Childhood Care and Education Network

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENT UNITS (Summary)

There are no anticipated implementation costs or savings to state or local governmental units as a result of the proposed rule change. The proposed rule change provides for the inclusion of family child care homes with current academic approval in the definition of early childhood care and education programs and sites. The proposed change also includes revisions to observation requirements, child-to-teacher ratios, and technical edits.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

The proposed rule change will not have an effect on revenue collections of state or local governmental units.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES OR NONGOVERNMENTAL GROUPS (Summary)

The proposed rule change will not result in costs and/or benefits to directly affected persons, small businesses, or nongovernmental groups.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

The proposed rule change will not have an effect on competition and employment.

Beth Scioneaux	Patrice Thomas
Deputy Superintendent	Deputy Fiscal Officer
2/307#051	Legislative Fiscal Office

NOTICE OF INTENT

Board of Elementary and Secondary Education

Bulletin 741—The Louisiana School, District, and State Accountability System—Graduation Appeals Process (LAC 28:CXV.717, 2321, and 2322)

In accordance with the provisions of R.S. 17:6(A)(10) and the Administrative Procedure Act (APA), R.S. 49:953(B)(1) et seq., the Board of Elementary and Secondary Education proposes to amend LAC 28:CXV in *Bulletin 741—The Louisiana School, District, and State Accountability System.* The proposed revisions create an appeals process for graduation. This appeals process creates a rigorous evaluation method in which in a student's senior year, a student, who fails to achieve a "passing" score on the end-ofcourse exam in a testing pair may demonstrate proficiency using a portfolio. All students will still be required to take all state assessments. The change will be to allow for an appeals process for purposes of graduation only.

Title 28

EDUCATION Part CXV. Bulletin 741—Louisiana Handbook for

School Administrators

Chapter 7. Records and Reports §717. Reports of High School Credit

A. - A.3. ...

B. Reporting and Review for State Diplomas Issued on Appeal

1. No later than October 1 annually, LEAs shall submit the following graduation data by school site via the student transcript system (STS). The LDOE will compile and submit a report to BESE annually in December, which will include the following:

a. the total number of students issued a diploma;

b. the number of students issued a diploma via an appeal of the assessment requirement granted via SBLC;

c. the number of students considered by an SBLC for appeal of the assessment requirement;

d. the number of students in the graduation cohort who did not earn a diploma by August 31 of that year; and

e. an example of three exemplary portfolios that may be used by the department as examples for LEAs and school sites.

2. At the January 2026 BESE meeting the LDOE shall submit a report to BESE, detailing data for the initial two school years of implementation regarding appeals to the assessment requirements for the purposes of graduation eligibility. The report shall serve as a reference for BESE to use in determining if policy revisions are necessary. The LDE will report to BESE annually thereafter and will include the following:

a. the percentage of college enrollment after high school exit of all graduating students, students issued a diploma via the graduation appeals process, and nongraduates in each respective graduation cohort;

b. to the extent that data is available, the percentage of employment after high school exit of all graduating students, students issued a diploma via the graduation appeals process, and non-graduates in each respective graduation cohort; and

c. the number of IBCs earned by type of all graduating students, students issued a diploma via the graduation appeals process, and non-graduates in each respective graduation cohort.

C. Auditing of Diplomas Issued on Appeal

1. In the event the number of students, issued a diploma via an appeal, exceeds three percent of the respective graduation cohort of a school site, the governing LEA shall submit additional data to LDOE to be included in the BESE annual report. At a minimum, the additional data shall include Subgroup population information as follows for each school site which exceeds the three-percent threshold:

- a. African American;
- b. American Indian/Alaskan Native;
- c. Asian;
- d. Hispanic;
- e. white;

- f. two or more races;
- g. economically disadvantaged;
- h. immigrants;
- i. English learners;
- j. students with disabilities;
- k. students with 504 plans;
- l. homeless students;
- m. military-affiliated students; and
- n. Foster care students.

2. After an initial audit regarding the three percent threshold, a school, serving a unique population and in compliance with appeals eligibility requirements, shall be exempt from consecutive audits

3. If the initial audit yields discrepancies in the implementation of the appeals process, the State Superintendent of Education, may be the final authorizer for the respective school site the following year.

D. Random Sampling for Appeals Audits

1. For the students described in Subsection C of this Section, the LDOE may audit a random sampling of the full appeals packets brought to SBLC team to include the following:

a. an appeals cover page which attests completion of appeal requirements and signatures of the SBLC team in which the appeal was granted;

b. evidence of intervention required by §2321.E of this Part;

c. evidence of content proficiency through the state assessment requirement or portfolio submission;

d. evidence of employability; and/or

e. any additional documentation requested by the LDOE for the respective students.

E. Prior to the date of graduation or options program completion, the LDOE shall have the authority to determine the issuance of a diploma or an options program skill certificate.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6(A)(11).

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1270 (June 2005), amended LR 39:2204 (August 2013), LR 49:

Chapter 23. Curriculum and Instruction Subchapter A. Standards and Curricula

§2321. Appeals Eligibility and Requirements

A. Beginning with the 2023-2024 school year, if a student has not met state-established benchmarks in both assessments within any of the prescribed categories in §2318.A of this Part, the SBLC team may determine if the student is able to appeal the assessment requirements for the purposes of graduation eligibility.

B. Students who appeal the assessment requirement for graduation eligibility, shall be afforded the same opportunities to pursue a standard diploma to exit high school with all course credits, honors, and financial awards as other students. A student is not guaranteed a diploma and shall meet either the standard requirements for graduation or, using the process outlined in Subsection D of this Section, appeal to the respective school building level committee (SBLC) team to be awarded a diploma.

1. - 3.d. Repealed

C. Pursuant to the Elementary and Secondary Education Act (ESEA), the state academic content standards shall apply to all public schools and public school students in the state and include the same knowledge and skills expected of all students and the same level of achievement expected of all students, with the exception of students with the most significant cognitive disabilities who may access alternate academic achievement standards and achievement levels. Only diplomas earned by students who have pursued the regular academic state standards and who have earned all state-required Carnegie credits shall be considered regular diplomas in the state and district accountability system, pursuant to federal laws and regulations.

D. Appeals Eligibility.

1. Students are eligible for an appeal to the assessment requirement no earlier than senior year and shall fulfill the following criteria:

a. earn all Carnegie Units required for either the TOPS university diploma or career diploma, as prescribed in §2318 and §2319 of this Part; and

b. fulfill at least one of the following conditions to demonstrate evidence of employability:

i. demonstrate workforce readiness by a score of Silver or higher on ACT WorkKeys;

ii. eligibility for the TOPS Tech Award; or

iii. demonstrate mastery of specific employability skills by earning a graduation-qualifying, industry-based credential (IBC), outlined in §2319 of this Part, regardless of the diploma pathway that the student is pursuing.

c. fulfill at least one of the following conditions to demonstrate evidence of content proficiency:

i. fulfill the standard assessment requirement for the assessment pairs prescribed in §2318. A of this Part, or

ii. For the freshman cohort entering 2022-2023 and beyond, complete a portfolio of work that meets the content proficiency requirement, as measured by the LDOE standardized rubric, for both LEAP 2025 courses in the assessment pairs in which the standard assessment requirement was not fulfilled.

iii. For students entering the freshmen cohort prior to 2022-2023, the portfolio requirement may be satisfied by completing a portfolio aligned to one course in each corresponding LEAP 2025 assessment pair that was not fulfilled by the standard assessment requirement.

2. Pursuant to §707 of this Part, for a transfer student transferring into a Louisiana public school district from an out-of-state school, nonpublic school, or approved home study program, proficiency shall be demonstrated via successful completion of coursework and the issuance of Carnegie credit. A transfer student is not required to take the LEAP 2025 assessment in the courses that were transferred and accepted as Carnegie credit. For the purposes of appeals eligibility, a portfolio of work need not be completed for coursework fulfilled for transferred Carnegie credit.

E. Monitoring Progress and Responsibilities for Appeals Eligibility.

1. The SBLC shall monitor the progress of each student, who has not met a least one assessment requirement for graduation. The SBLC shall ensure that the student:

a. receives appropriate academic supports in any and all subjects for which the standard assessment requirement was not achieved. Additionally, each individual student graduation plan shall outline all academic supports provided. Progress, pursuant to such specified academic supports, shall be reviewed at least once throughout the school year in order to determine needed adjustments as well as effectiveness;

b. completes 30 hours of required remedial or corequisite instruction for the LEAP 2025 exam in which the standard assessment requirement was not achieved, per *Bulletin 741, §2318* and *§2319*;

c. is provided dropout prevention and mentoring services, based on proven strategies to retain and graduate at-risk students. The LDOE shall make available to LEAs, a list of strategies, as well as technical assistance needed to offer students such services; and

d. is scheduled for a meeting in order to determine eligibility for local career support with a representative from a Workforce Innovation Opportunities Act provider, Vocational Rehabilitation Services provider, or other local career support agency and its affiliated providers.

F. Appeals Consideration

1. The SBLC shall review and consider individual student appeals for any student, who meets the appeal requirements, as outlined in Subsection D of this Section. Additionally, the SBLC may consider the following in determining an appeal decision:

a. the course grade awarded for the course which the student did not attain the standard assessment requirement for graduation on the LEAP 2025;

b. the score achieved on each LEAP 2025 assessment for which the student did not attain the standard assessment requirement for graduation;

c. the score achieved on the ACT, ACT WorkKeys, and, if applicable, TOPS or TOPS Tech scholarship eligibility;

d. the rigor of secondary coursework, including, successful completion of honors courses, Advanced Placement courses, IAB, and/or dual enrollment courses;

e. completion of a sequence of courses for an IBC within the Career Diploma;

f. the strength of an attained IBC in alignment with definitions outlined in LAC 28:XI.709;

g. overall preparedness for postsecondary success, including letters or certificates of acceptance to post-secondary institutions; and

h. any other academic information designated for consideration by the LEA for appeal consideration by the SBLC.

G. For students meeting the requirements outlined in Subsection D of this Section, the SBLC may determine that the student is eligible to graduate, subject to final approval of the Local Education Agency (LEA) head. A student who appeals the assessment requirement for graduation may graduate and receive a high school diploma on the basis of the committee decision by majority and the LEA head. This subsection does not create a property interest in graduation. The decision of the SBLC and LEA head is final and may not be appealed. Should an SBLC and LEA head not recommend a student for graduation eligibility by appeal, a student may only graduate through standard assessment requirements.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:7, R.S. 17:24.4, R.S. 17:183.2, and R.S. 17:395.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 32:240 (February 2006), repromulgated LR 41:1483 (August 2015), LR 49:

§2322. Senior Projects

[Formerly §2321]

A. A senior project is a focused rigorous independent learning experience completed during the student's year of projected graduation from high school.

B. Each LEA allowing students to complete a senior project in partial fulfillment of the requirements for an academic endorsement shall develop local policy for senior projects that includes these requirements.

1. Each student must choose a challenging topic of interest approved by their parents or guardians and the school-level senior project committee.

2. Each student must have a senior project mentor.

3. Students must successfully complete the four components listed below with a score of satisfactory or higher on each component. The components will be evaluated locally using rubrics provided by the LDOE:

a. research paper of 8 to 10 pages on an approved topic of the student's choice;

b. product or service related to the research requiring at least 20 hours of work;

c. portfolio that documents and reflects the senior project process; and

d. presentation to a panel of three to five adults from the community and school.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:7, R.S. 17:24.4, R.S. 17:183.2, and R.S. 17:395.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 49:

Family Impact Statement

In accordance with section 953 and 974 of title 49 of the Louisiana Revised Statutes, there is hereby submitted a Family Impact Statement on rules proposed for adoption, repeal, or amendment. All Family Impact Statements will be kept on file in the state board office which has adopted, amended, or repealed rules in accordance with the applicable provisions of the law relating to public records.

1. Will the proposed Rule affect the stability of the family? No.

2. Will the proposed Rule affect the authority and rights of parents regarding the education and supervision of their children? No.

3. Will the proposed Rule affect the functioning of the family? No.

4. Will the proposed Rule affect family earnings and family budget? No.

5. Will the proposed Rule affect the behavior and personal responsibility of children? No.

6. Is the family or a local government able to perform the function as contained in the proposed Rule? Yes.

Poverty Impact Statement

In accordance with section 973 of title 49 of the Louisiana Revised Statutes, there is hereby submitted a Poverty Impact Statement on rules proposed for adoption, amendment, or repeal. All Poverty Impact Statements will be in writing and kept on file in the state agency which has adopted, amended, or repealed rules in accordance with the applicable provisions of the law relating to public records. For the purposes of this section, the word "poverty" means living at or below 100 percent of the federal poverty line.

1. Will the proposed Rule affect the household income, assets, and financial authority? No.

2. Will the proposed Rule affect early childhood development and preschool through postsecondary education development? No.

3. Will the proposed Rule affect employment and workforce development? Yes.

4. Will the proposed Rule affect taxes and tax credits? No.

5. Will the proposed Rule affect child and dependent care, housing, health care, nutrition, transportation, and utilities assistance? No.

Small Business Analysis

The impact of the proposed Rule on small businesses as defined in the Regulatory Flexibility Act has been considered. It is estimated that the proposed action is not expected to have a significant adverse impact on small businesses. The agency, consistent with health, safety, environmental and economic welfare factors has considered and, where possible, utilized regulatory methods in the drafting of the proposed rule that will accomplish the objectives of applicable statutes while minimizing the adverse impact of the proposed rule on small businesses.

Provider Impact Statement

The proposed Rule should not have any known or foreseeable impact on providers as defined by HCR 170 of the 2014 Regular Legislative Session. In particular, there should be no known or foreseeable effect on:

1. the staffing level requirements or qualifications required to provide the same level of service;

2. the cost to the providers to provide the same level of service; or

3. the ability of the provider to provide the same level of service.

Public Comments

Interested persons may submit written comments via the U.S. Mail until noon, August 9, 2023, to Shan N. Davis, Executive Director, Board of Elementary and Secondary Education, Box 94064, Capitol Station, Baton Rouge, LA 70804-9064. Written comments may also be hand delivered to Shan Davis, Executive Director, Board of Elementary and Secondary Education, Suite 5-190, 1201 North Third Street, Baton Rouge, LA 70802 and must be date stamped by the BESE office on the date received. Public comments must be dated and include the original signature of the person submitting the comments.

Shan N. Davis Executive Director

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES RULE TITLE: Bulletin 741—The Louisiana School, District, and State Accountability System Graduation Appeals Process

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENT UNITS (Summary)

The proposed rule change is anticipated to increase costs within the Louisiana Department of Education (LDE) related to the creation of a rubric for each subject area of the portfolio of work as well as to the review of audits.

The proposed change creates an appeals process for certain students who do not meet current graduation requirements. Louisiana is the one of eight states in the country which has high stakes testing for graduation, but it is the only state in the country which does not have an alternative method for appeals in order for students to demonstrate proficiency in the content being assessed. The proposed appeal process creates a rigorous evaluation method in which, during a student's senior year, a student who fails to achieve a "passing" score on the end-ofcourse exam in a testing pair may demonstrate proficiency using a portfolio. All students will still be required to take all state assessments. The change will allow for an appeals process for purposes of graduation only.

Per LA R.S. 17:24.4, 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. Further, the statute states. F(1)(j)(3)(a), that, "in lieu of the standards-based assessments prescribed in Subparagraphs (1)(c) and (d) of this Subsection, an alternate assessment shall be provided for and administered only to those students with disabilities who meet specific eligibility criteria developed by the state Department of Education (LDE) and approved by the State Board of Elementary and Secondary Education (BESE). A determination of whether any student meets the eligibility criteria established by the state Department of Education shall be made by the student's Individualized Education Program committee and shall be so noted on that student's Individualized Education Program." This rule change does not allow for an alternate assessment, waiver of policy, or an alternate pathway for graduation. It simply institutes an appeals process for students in order to satisfy the graduation requirement via the portfolio by demonstrating proficiency in that regard, as opposed to achieving a certain score on standardized tests. Achieving a specific score on course assessments is not currently outlined in policy, but rather, the test must be administered to all students, excluding special education students, and scores are averaged into a student's course grade. This process will not allow for a course grade to be altered in any way.

Additionally, the student must provide evidence of employability by earning a silver or better on the WorkKeys assessment, earning a TOPS Tech award, or earning an approved Louisiana Jump Start Industry Based Credential. Students who have not met the approved Carnegie unit requirements for the TOPS University or TOPS Tech Career Diplomas are not eligible for an appeal. Approval of the appeal is made by the School Building Level Committee (SBLC) and the local education agency (LEA) leader. School sites who exceed an appeal rate of 3percent of a graduating cohort are subject to an audit by LDE.

LDE reports the development of rubrics to assess mastery of standards in each subject through a portfolio of entries would require the work of Teacher Leader Advisors (TLAs), who complete tasks in areas of expertise through contracts for different types of deliverables. Based on LDE estimates, it could cost approximately \$76,600 for the project management and the TLA contracts to develop items for each standard. Internal review of the items would be absorbed by existing staff. LDE further reports the auditing of schools outside of the 3percent limit would require an additional Education Program Consultant 3 position. Beginning in FY 24, the cost for this position would be \$119,503.19 (\$104,414.50 salary and \$15,088.69 related benefits). Finally, LDE reports scoring of portfolios during the year subsequent to audit findings of a school with more than the allowable number of diplomas issued would require the work of contracted reviewers and is estimated at \$150 per review (in this case, per subject) based on similar work. This total cost would depend on the number of portfolios submitted during the year following the finding of discrepancies in appeals process implementation.

The already established School Building Level Committee (SBLC) and the Local Education Agency (LEA) head, will score portfolios with a standardized rubric, which will be subject to an annual audit. The SBLC is currently doing much of this work; therefore, the proposed rule change should not increase costs for the local school districts.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

The proposed rule change will not have an effect on revenue collections of state or local governmental units.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES OR NONGOVERNMENTAL GROUPS (Summary)

The proposed rule change will benefit certain high school seniors by allowing students to graduate via an alternate portfolio approach. Some students may graduate on time despite not meeting the LEAP 2025 assessment requirements for graduation. In years prior to COVID, approximately 5percent to 7percent of public-school students did not meet graduation requirements due only to the fact that the required LEAP assessment scores were not achieved. This policy change will allow these students to demonstrate the fulfillment of the same course proficiency standards as currently proven via standardized assessments, through an appeal in which the portfolio will serve as a substitute in verifying course competency.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

Data from the US Bureau of Labor Statistics reveals that 41.9percent of high school dropouts are engaged in work or looking for work compared to 69.2percent of high school graduates. Data on high school graduates in Texas who utilized the state's appeal process show they have employment rates that are statistically indistinguishable from national data on high school graduates. The assumption is that Louisiana can expect similar results for students who graduate using this new appeals process. The median weekly wage of a high school dropout is \$626 compared to \$809 for an individual with a high school diploma. Additionally, because the appeal has an employability component, we can expect a greater number of students graduating with an industry-based credential that is aligned with regional and statewide workforce needs.

Shan N. Davis Executive Director 2307#053 Patrice Thomas Deputy Fiscal Officer Legislative Fiscal Office

NOTICE OF INTENT

Board of Elementary and Secondary Education

Bulletin 746—Louisiana Standards for State Certification of School Personnel—Certification Endorsements (LAC 28:CXXXI.1301)

In accordance with the provisions of R.S. 17:6(A)(10) and the Administrative Procedure Act (APA), R.S. 49:953(B)(1) et seq., the Board of Elementary and Secondary Education proposes to amend LAC 28:CXXXI in *Bulletin* 746—Louisiana Standards for State Certification of School Personnel. The revision provides a future effective date relative to certain teacher certification area endorsements. Educators completing course requirements for certification endorsements who are employed as teachers are completing the foundational literacy skills training through the LDOEapproved providers within the local school system. The future effective date aligns add-on endorsements with the effective date for initial certification literacy requirements.

TITLE 28/

EDUCATIÓN

Part CXXXI. Bulletin 746—Louisiana Standards for State Certification of School Personnel Chapter 13. Endorsements to Existing Certificates

§1301. Introduction

A. - C.3. ...

D. The requirements / in §1305.A.3; §1307.A.3; §1327.A.3, B.3, C.3, D.8, E.3; and §1329.A.4 of this Chapter, shall be effective beginning September 1, 2024.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6(A)(10), (11), and (15)/ R.S. 17:7(6), R.S. 17:10, R.S. 17:22(6), R.S. 17:391.1-391.10, and/R.S. 17:411

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, IR 33:2059 (October 2007), LR 48:454 (March 2022), repromulgated LR 48: 1062 (April 2022), amended LR 49

Family Impact Statement

In accordance with section 953 and 974 of title 49 of the Louisiana Revised Statutes, there is hereby submitted a Family Impact Statement on rules proposed for adoption, repeal, or amendment. All Family Impact Statements will be kept on file in the state board office which has adopted, amended, or repealed rules in accordance with the applicable provisions of the law relating to public records.

1. Will the proposed Rule affect the stability of the family? No./

2. Will the proposed Rule affect the authority and rights of parents regarding the education and supervision of their children? No.

3. /Will the proposed Rule affect the functioning of the family? No.

4/ Will the proposed Rule affect family earnings and family budget? No.

5. Will the proposed Rule affect the behavior and personal responsibility of children? No.

6. Is the family or a local government able to perform the function as contained in the proposed Rule? Yes.

ATTACHMENT #3

Copy of updated Fiscal and Economic Impact Statement (FEIS)

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES

Person Preparing Statement:	Shan Davis	Dept.:	Louisiana Board of Elementary and Secondary Education
Phone:	(225) 342-5840	Office	: Executive Director
Return Address;	1201 North Third Street Baton Rouge, LA 70802	Rule Title:	Part CXV. Bulletin 741—Louisiana Handbook for School Administrators (LAC 28:CXV.717, 2321, and 2322)
		Date F Takes	tule Effect: Upon Promulgation

In accordance with Section 961 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND <u>WILL BE PUBLISHED IN</u> THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.

SUMMARY (Use complete sentences)

ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

İ.

The proposed rule change is anticipated to increase costs within the Louisiana Department of Education (LDE) related to the creation of a rubric for each subject area of the portfolio of work as well as to the review of audits.

The proposed change creates an appeals process for certain students who do not meet current graduation requirements. Louisiana is the one of eight states in the country which has high stakes testing for graduation, but it is the only state in the country which does not have an alternative method for appeals in order for students to demonstrate proficiency in the content being assessed. The proposed appeal process creates a rigorous evaluation method in which, during a student's senior year, a student who fails to achieve a "passing" score on the end-of-course exam in a testing pair may demonstrate proficiency using a portfolio. All students will still be required to take all state assessments. The change will allow for an appeals process for purposes of graduation only.

Per LA R.S. 17:24.4, 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. Further, the statute states, F(1)(j)(3)(a), that, "in lieu of the standards-based assessments prescribed in Subparagraphs (1)(c) and (d) of this Subsection, an alternate assessment shall be provided for and administered only to those students with disabilities who meet specific eligibility criteria developed by the state Department of Education (LDE) and approved by the State Board of Elementary and Secondary Education (BESE). A determination of whether any student meets the eligibility criteria established by the state Department of Education shall be made by the student's Individualized Education Program committee and shall be so noted on that student's Individualized Education Program." This rule change does not allow for an alternate assessment, waiver of policy, or an alternate pathway for graduation. It simply institutes an appeals process for students in order to satisfy the graduation requirement via the portfolio by demonstrating proficiency in that regard, as opposed to achieving a certain score on standardized tests. Achieving a specific score on course assessments is not currently outlined in policy, but rather, the test must be administered to all students, excluding special education students, and scores are averaged into a student's course grade. This process will not allow for a course grade to be altered in any way.

Additionally, the student must provide evidence of employability by earning a silver or better on the WorkKeys assessment, earning a TOPS Tech award, or earning an approved Louisiana Jump Start Industry Based Credential. Students who have not met the approved Carnegie unit requirements for the TOPS University or TOPS Tech Career Diplomas are not eligible for an appeal. Approval of the appeal is made by the School Building Level Committee (SBLC) and the local education agency (LEA) leader. School sites who exceed an appeal rate of 3% of a graduating cohort are subject to an audit by LDB.

LDE reports the development of rubrics to assess mastery of standards in each subject through a portfolio of entries would require the work of Teacher Leader Advisors (TLAs), who complete tasks in areas of expertise through contracts for different types of deliverables. Based on LDE estimates, it could cost approximately \$76,600 for the project management and the TLA contracts to develop items for each standard. Internal review of the items would be absorbed by existing staff. LDE further reports the auditing of schools outside of the 3% limit would require an additional Education Program Consultant 3 position. Beginning in FY 24, the cost for this position would be \$119,503.19 (\$104,414.50 salary and \$15,088.69 related benefits). Finally, LDE reports scoring of portfolios during the year subsequent to audit findings of a school with more than the allowable number of diplomas issued would require the work of contracted reviewers and is estimated at \$150 per review (in this case, per subject) based on similar work. This total cost would depend on the number of portfolios

submitted during the year following the finding of discrepancies in appeals process implementation.

The already established School Building Level Committee (SBLC) and the Local Education Agency (LEA) head, will score portfolios with a standardized rubric, which will be subject to an annual audit. The SBLC is currently doing much of this work; therefore, the proposed rule change should not increase costs for the local school districts

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

The proposed rule change will not have an effect on revenue collections of state or local governmental units.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NON-GOVERNMENTAL GROUPS (Summary)

The proposed rule change will benefit certain high school seniors by allowing students to graduate via an alternate portfolio approach. Some students may graduate on time despite not meeting the LEAP 2025 assessment requirements for graduation. In years prior to COVID, approximately 5% to 7% of public-school students did not meet graduation requirements due only to the fact that the required LEAP assessment scores were not achieved. This policy change will allow these students to demonstrate the fulfillment of the same course proficiency standards as currently proven via standardized assessments, through an appeal in which the portfolio will serve as a substitute in verifying course competency.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

Data from the US Bureau of Labor Statistics reveals that 41.9% of high school dropouts are engaged in work or looking for work compared to 69.2% of high school graduates. Data on high school graduates in Texas who utilized the state's appeal process show they have employment rates that are statistically indistinguishable from national data on high school graduates. The assumption is that Louisiana can expect similar results for students who graduate using this new appeals process. The median weekly wage of a high school dropout is \$626 compared to \$809 for an individual with a high school diploma. Additionally, because the appeal has an employability component, we can expect a greater number of students graduating with an industry-based credential that is aligned with regional and statewide workforce needs

Signa

Dr. Holly Boffy, BESE President Typed Name & Title of Agency Head or Designee 10/9/2023

Date of Signature

eputy Fiscal Officer

Legislative Fiscal Officer or Designee

Date of Signature

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES

The following information is required in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

A. Provide a brief summary of the content of the rule (if proposed for adoption, or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

The proposed change creates an appeals process for certain students who do not meet current graduation requirements. Louisiana is the one of eight states in the country which has high stakes testing for graduation, but it is the only state in the country which does not have an alternative method for appeals in order for students to demonstrate proficiency in the content being assessed. The proposed appeal process creates a rigorous evaluation method in which, during a student's senior year, a student who fails to achieve a "passing" score on the end-of-course exam in a testing pair may demonstrate proficiency using a portfolio. All students will still be required to take all state assessments. The change will be to allow for an appeals process for purposes of graduation only.

Per LA R.S. 17:24.4, 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. Further, the statute states, F(1)(j)(3)(a), that, "in lieu of the standards-based assessments prescribed in Subparagraphs (1)(c) and (d) of this Subsection, an alternate assessment shall be provided for and administered only to those students with disabilities who meet specific eligibility criteria developed by the state Department of Education and approved by the State Board of Elementary and Secondary Education. A determination of whether any student meets the eligibility criteria established by the state Department of Education shall be made by the student's Individualized Education Program committee and shall be so noted on that student's Individualized Education Program." This rule change does not allow for an alternate assessment, waiver of policy, or an alternate pathway for graduation. It simply institutes an appeals process for students in order to satisfy the graduation requirement via the portfolio by demonstrating proficiency in that regard, as opposed to achieving a certain score on standardized tests. Achieving a specific score on course assessments is not currently outlined in policy, but rather, the test must be administered to all students, excluding special education students, and scores are averaged into a student's course grade. This process will not allow for a course grade to be altered in any way.

Additionally, the student must provide evidence of employability by earning a silver on the WorkKeys, earning a TOPS Tech award, or earning an approved Louisiana Jump Start Industry Based Credential. Students who have not met the approved Carnegie unit requirements for the TOPS University or TOPS Tech Career Diplomas are not eligible for an appeal. Approval of the appeal is made by the School Building Level Committee (SBLC) and the local education agency (LEA) leader. School sites who exceed an appeal rate of 3% of a graduating cohort are subject to an audit by the LDE.

B. Summarize the circumstances, which require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

Several factors can impact a student's ability to pass assessments required for graduation. The option of this appeal would allow seniors to demonstrate content mastery through a portfolio of work as an alternate path for graduation. The Every Student Succeeds Act (ESSA) requires that every public school student must be assessed. This policy revision will not remove the requirement to test. All students will still be required to take all state assessments. The change will be to allow for an appeals process for purposes of graduation.

- C. Compliance with Act 11 of the 1986 First Extraordinary Session
 - (1) Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

Yes. LDE reports there is currently no funding source available to meet the requirements of the proposed rule change; however, BESE reports they can provide LDE funding for this purpose from statutory dedications out of the Louisiana Quality Education Support Fund.

The Louisiana Constitution requires that 37.5% of the interest earnings from the Louisiana Quality Education Support Fund, commonly referred to as 8(g), be allocated to BESE for the enhancement of elementary and secondary education. One of the constitutionally allowable uses of 8(g) funds is "to fund exemplary programs in elementary or secondary schools designed to improve elementary or secondary student academic achievement or vocational-technical skills." BESE reports the proposed rule would fall under this allowable use. Based on projections adopted by the REC, Act 447 of the 2023 RS appropriated \$20.5 M in 8(g) funds to BESE for FY 24. As a result of certain schools not drawing down their allocation of these funds, BESE states there are enough unallocated funds within the Block and Administrative categories in FY 24 remaining to provide to LDE to cover

implementation costs associated with the proposed rule in the current fiscal year. BESE additionally reports they plan to include this activity when planning expenditures of 8(g) funds in future fiscal years.

- (2) If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?
 - (a) _____ YES. If yes, attach documentation.

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(b) _____ NO. If no, provide justification as to why this rule change should be published at this time

This rule change will give students options when it comes to graduation.

FISCAL AND ECONOMIC IMPACT STATEMENT WORKSHEET

I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED

1. What is the anticipated increase (decrease) in costs to implement the proposed action?

The proposed rule change may produce a cost to the Louisiana Department of Education (LDE) as it relates to creating a rubric for each subject area of the portfolio of work, as well as reviewing audits.

COSTS	FY 24	FY 25	FY 26
Personal Services	Increase	Increase	Increase
Operating Expenses	0	. 0	0.
Professional Services	Increase	Increase	Increase
Other Charges	0	0	0
Equipment	0	. Q	0
Major Repairs & Constr.	0	0	00
TOTAL	Increase	Increase	Increase
POSITIONS (#)	. 1	1	1

2. Provide a narrative explanation of the costs or savings shown in "A. 1.", including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

Rubrics will have to be created by LDE. The department will also be responsible for reviewing any audits as a result of these revisions. LDE reports the development of rubrics to assess mastery of standards in each subject through a portfolio of entries would require the work of Teacher Leader Advisors (TLAs), who complete tasks in areas of expertise through contracts for different types of deliverables. Based on LDE estimates, it could cost approximately \$76,600 for the project management and the TLA contracts to develop items for each standard. Internal review of the items would be absorbed by existing staff. LDE further reports the auditing of schools outside of the 3% limit would require an additional Education Program Consultant 3 position. Beginning in FY 24, the cost for this position would be \$119,503.19 (\$104,414.50 salary and \$15,088.69 related benefits). Finally, LDE reports scoring of portfolios during the year subsequent to audit findings of a school with more than the allowable number of diplomas issued would require the work of contracted reviewers and is estimated at \$150 per review (in this case, per subject) based on similar work. This total cost would depend on the number of portfolios submitted during the year following the finding of discrepancies in appeals process implementation.

3. Sources of funding for implementing the proposed rule or rule change.

SOURCE	FY 24	FY 25	FY 26
State General Fund	0	0	0
Agency Self-Generated	0	0	0
Dedicated	0	0	0
Federal Funds	0	0	0
Other (Specify)	Increase	Increase	Increase
TOTAL	Increase	Increase	Increase

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

LDE reports there is currently no funding source available to meet the requirements of the proposed rule change; however, BESE reports the board can provide 8(g) funds for this purpose. BESE funds would originate from statutory dedications which would then be transferred to LDE and expended as IAT.

As a result of certain schools not drawing down their allocation of these funds, BESE states there are enough unallocated funds within the Block and Administrative categories in FY 24 remaining to provide to LDE to cover current fiscal year implementation costs associated with the proposed rule. BESE additionally reports they plan to include this project when planning expenditures of 8(g) funds in future fiscal years.

B. <u>COST OR SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION</u> <u>PROPOSED.</u>

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and

methods used in calculating this impact.

The proposed rule change will not impact local governmental units.

2. Indicate the sources of funding of the local governmental unit, which will be affected by these costs or savings.

The proposed rule change will not impact sources of funding of local governmental units.

FISCAL AND ECONOMIC IMPACT STATEMENT WORKSHEET

II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS

A. What increase (decrease) in revenues can be anticipated from the proposed action?

The proposed rule change will not have an effect on revenue collections of state or local governmental units.

REVENUE INCREASE/DECREASE	FY 24	FY 25	FY 26
State General Fund	0	0	0
Agency Self-Generated	0	0	0
Dedicated Funds*	0	0	0
Federal Funds	0	0	0
Local Funds	0	0	0'
TOTAL	0	0	0

*Specify the particular fund being impacted.

B. Provide a narrative explanation of each increase or decrease in revenues shown in "A." Describe all data, assumptions, and methods used in calculating these increases or decreases.

Not applicable.

FISCAL AND ECONOMIC IMPACT STATEMENT WORKSHEET

- III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS, SMALL BUSINESSES, OR NONGOVERNMENTAL GROUPS
 - A. What persons, small businesses, or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

The proposed rule change will benefit certain high school seniors by allowing students to graduate via an alternate portfolio approach. Some students may graduate on time despite not meeting the LEAP 2025 assessment requirements for graduation. In years prior to COVID, approximately 5% to 7% of public-school students did not meet graduation requirements due only to the fact that the required LEAP assessment scores were not achieved. This policy revision will allow these students to demonstrate the fulfillment of the same course proficiency standards, demonstrated via standardized assessments, through an appeal in which the portfolio will serve as a substitute in verifying course competency.

B. Also provide an estimate and a narrative description of any impact on receipts and/or income resulting from this rule or rule change to these groups.

Not applicable.

IV. EFFECTS ON COMPETITION AND EMPLOYMENT

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

Data from the US Bureau of Labor Statistics reveals that 41.9% of high school dropouts are engaged in work or looking for work compared to 69.2% of high school graduates. Data on high school graduates in Texas who utilized the state's appeal process have employment rates that are statistically indistinguishable from national data on high school graduates. The assumption is that Louisiana can expect similar results for students who graduate using this new appeals process. The median weekly wage of a high school dropout is \$626 compared to \$809 for an individual with a high school diploma. Additionally, because the appeal has an employability component, we can expect a greater number of students graduating with an industry-based credential. These ordentials are aligned with regional and statewide workforce needs.

ATTACHMENT #4

Public comments received prior to public hearing

July 20, 2023



Ms. Shan N. Davis Executive Director, Board of Elementary and Secondary Education Box 94064 Capitol Station Baton Rouge, LA 70804-9064

RE: EXCELL appeals process - Title 28 Part CXV. Bulletin 741, Chapter 7 Section 717; Chapter 23 Subchapter A Section 2321 and Section 2322

Dear Ms. Davis,

On behalf of children in Baton Rouge, I write to request that BESE hold a formal hearing to discuss the EXCELL appeals process it recently voted to adopt. In our opinion, the new appeals process is deeply flawed and overly applicable outside what should be a rarely-used and exceedingly limited set of exceptions to the state's standards for graduation.

Our world gets more competitive and challenging every day. Students who are unable to achieve grade-level scores on high school assessments should be provided with support and intervention, rather than a work-around. The BESE board instituted end-of-course assessments for a reason: to ensure that graduating students are prepared for their lives after high school, whether that is pursuing post-secondary education or entering the workforce. An inability to demonstrate performance via the approved state assessments begs the questions of whether a student has truly been educated in a way that will provide opportunities for success post-high school, and whether waivers of such requirements will ultimately be a deep disservice and injustice to the students who receive them.

In Baton Rouge, the average composite ACT score at our open enrollment high schools is a 14, and like in many other places in Louisiana, only about one-third of our high school students are reading and doing math on grade-level. The BESE board should be focusing on strategies and tactics that will change these statistics for the better rather than finding ways to work around the assessments that alert us to the challenges facing our students.

Thank you for your efforts on behalf of Louisiana's children.

Sincerely,

Adonica Pelichet Duggan CEO, Baton Rouge Alliance for Students



JUL 2 5 2023



500 MAIN ST BATON ROUGE, LA 70801

225.928.5388 www.labi.org

July 20, 2023

Ms. Shan Davis Executive Director, Board of Elementary and Secondary Education Suite 5-190 1201 North Third St Baton Rouge, LA 70802

To whom it may concern:

The Louisiana Association of Business and Industry (LABI) is opposed to the proposed changes to Bulletin 741 Sections 717, 2321, and 2322 to provide for an appeals process as it relates to graduation assessment requirements for all students in Louisiana.

LABI represents more than 2,000 Louisiana employers and is the only association representing businesses of all sizes from a statewide, multi-industry perspective. Our members support a strong, robust education and workforce development system that prepares Louisianans to compete in the job marketplace. We believe the proposed policy will put Louisiana students at a competitive disadvantage in that market.

While we are not opposed to a graduation appeals process for English language learners (ELL), we are opposed to expanding the graduation appeal process to include all students. The proposed revisions to Bulletin 741 will water down the high school diploma, and artificially inflate school performance scores and school letter grades at a time when 70% of all public high schools are already rated A or B—despite our state being ranked 41st in K-12 education in the nation—causing uncertainty and confusion for employers seeking to fill jobs with qualified, skilled workers.

We ask that you reconsider this policy revision and address the root cause of students' inability to pass standardized assessments rather than implementing policies that weaken our students' high school diplomas and lower standards.

The Louisiana Association of Business and Industry (LABI) is formally requesting a public hearing on this proposed rule change as an association with over 2,000 members, pursuant to R.S. 49:961(B)(1).

Sincerely,

Brian Davis Director of Education and Workforce Development Louisiana Association of Business and Industry





July 25, 2023

Shan N. Davis Executive Director Board of Elementary and Secondary Education Suite 5-190 1201 North Third Street Baton Rouge, LA 70802

RECEIVED

JUL 2 6 2023

Board of Elementary and Secondary Education

RE: Request for Public Hearing concerning Universal Grad Appeals process

Dear Ms. Davis,

On Thursday June 12, 2023, BESE voted to approve a policy "Universal Grad Waiver Appeals Process." ERN (Education Reform Now) does not support this policy, and firmly believes this policy does not fully address the concerns of ELL students and, the appeals process should be a separate policy exclusive of ELL concerns. Therefore, we believe that this policy was erroneously decided and request a public hearing to discuss this matter.

First, this policy does not fully address the concerns of English Language learners (ELL). We arrived at this policy point because of months of discussion addressing the salient problem: how to address the accountability concerns of ELL students. Somehow, from the creation of a task force to bring solutions to the board, we ended with a completely different policy that nobody was aware of. It has been well documented that students who attend High school in Louisiana from another country where English is not predominately spoken do well on the math and science portions of the standardized testing but suffer on the language arts portions. ELL student's need a policy that is equitable and addresses their unique concerns specifically, a policy that addresses their English attainment.

Second, there should be an appeals process, however, this should be a separate policy that is not inclusive of ELL concerns. Louisiana is one of eight states that does not have an appeal process in place for graduating seniors. ERN strongly believes that we should enact one. Currently, the proposed policy for appeals only allows for the schools, specifically a school board level committee (SBLC) to make decisions without input from either the district or LDOE. This proposed makeup can potentially inject biases into an objective system governed by set standards designed for all students. There should be a member from each level (District, LDOE) involved. The goal should be that our High School Diplomas still matter and worth more than the paper they are printed on. Enactment of the proposed policy does not get us to that place.

In closing, ERN strongly opposes the implementation of the Universal Grad Appeal policy in its current form. The policy does not adequately reflect the needs of ELL students. Furthermore, the policy should not include ELL students and should only be reflective of a fair and equitable appeals process granted by a body made up of members from the school, district, and LDOE that adheres to state standards. Once again, we request a public hearing to discuss these concerns.

Best Regards,

Terrence Lockett Executive Director Education Reform Now-Louisiana



P.O. Box 4308 Baton Rouge, Louislana 70821 (225) 344-CABL (344-2225) Fax (225) 338-9470 Web Site: www.cabl.org E-mail: info@cabl.org

August 4, 2023

Ms. Shan Davis Executive Director, Board of Elementary and Secondary Education Suite 5-190 1201 North Third St Baton Rouge, LA 70802

Dear Ms. Davis,

I am writing on behalf of the Council for A Better Louisiana (CABL) to express our opposition to the proposed changes to Bulletin 741 Sections 717, 2321, and 2322 to provide for an appeals process as it relates to graduation assessment requirements for all students in Louisiana.

CABL has been involved in education issues for nearly three decades. We were one of the early architects of the original school accountability system, actively involved in the state's first high school redesign efforts, and a strong supporter of higher standards and expectations for students. Through it all, our work has focused on the urgent need to ensure that our schools prepare all students to succeed in postsecondary education and careers.

Unfortunately, we believe this proposed policy change is a step in the opposite direction, opening a door that would allow students to graduate high school without the basic skills they need to be successful in life.

This is a concern of CABL members who are employers. It is already a challenge for many of them to find the qualified workers they need without having to provide them with additional training on skills they should have learned in high school. They are concerned that this policy would only exacerbate that situation.

It is also a concern of CABL members who have been actively involved in postsecondary education. Last year some 14,000 students in Louisiana colleges were enrolled in remedial math classes and 4,000 in remedial reading. Adding to those numbers, as this proposed policy likely would, creates extra burdens on our postsecondary institutions while putting already struggling students at yet another disadvantage.

We are not opposed to a graduation appeals process for English language learners. We understand the issues there and want to give these students every chance to succeed in a way that will allow them to become productive citizens of our state. However, we are opposed to expanding the graduation appeal process to include all students.

AUG 8 2023

Ploard of Elementary and Sections Education Louisiana has already set a relatively low bar for students to graduate from high school. We fear that the proposed revisions to Bulletin 741 have the potential to lower that bar even further, calling into question the value and meaning of a high school diploma. This hurts the students who have failed to meet our existing standards, as well as those who have met all the qualifications for a high school degree.

This proposal represents a major change in our high school graduation requirements – not simply a small adjustment. And, it has significant implications for our school accountability system at the high school level, which we already know needs tightening and revision. If nothing else, this policy should receive a more robust review over a more appropriate time frame with the input of all stakeholders.

At the end of the day, our public education system should provide a legitimate opportunity for every child to be successful, both for their personal benefit and to create a more prosperous state for all. We believe the implementation of this proposed policy will have a negative impact on our efforts to achieve that.

For these reasons we ask that you reconsider this policy revision. Through this letter CABL is formally requesting a public hearing on this proposed rule change pursuant to R.S. 49:961(B)(1).

Sincerely, **Barry Erwin**

President Council for A Better Louisiana



July 31, 2023

Shan N Davis Executive Director, Board of Elementary and Secondary Education Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re Chapter 23 of Title 28

Dear Ms. Davis,

I am a lifelong resident of Louisiana, and have become aware of a potential new policy concerning the high school diploma in our state. Since a diploma is considered one of the benchmarks to obtain many jobs, I'm very concerned that the BESE is considering lowering the minimum standards to graduate. Employers need to be assured that their hires who have a diploma are capable of passing required tests, and that those who do are selected based on those assumed proficiencies.

I believe that graduates who have passed the necessary exams deserve an advantage in the marketplace over those who do not pass. I do also believe that those unable to pass should be offered assistance, but they need to work hard to meet the requirements rather than easily fall back on an alternative that does not equal the aptitude needed to earn a diploma.

I ask you to leave the current minimum standards as they are, and not compromise the value of a Louisiana High School diploma.

Thank you for your time.

Sincerely,

Melody Jackson 980 Panhandle Rd DeQuincy, LA 70633 337-802-6361



AUG 8 2013

July 31, 2023

Shan N Davis Executive Director, Board of Elementary and Secondary Education Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Dear Ms. Davis,

As a grandmother of ten I am concerned about a new policy that the BESE Board is gathering comments on. My understanding of this new policy is that the Louisiana high school diploma will no longer be an indicator of minimum English proficiency for employers to use when making hiring decisions. In addition, those students who have worked hard and earned their high school diploma by passing the exams now required will, with this new policy, lose a competitive advantage they currently have over students who were not able to pass the exams.

It seems to me that this new policy is targeting those students who score at level 1 (unsatisfactory). While I agree these students need to be targeted for guidance and direction into industry-based apprenticeship programs or technical educational degrees, *I do not believe we should lower the standards for our Louisiana graduates who are able to pass the minimum required exams.*

Finally, the HiSET gives these targeted students the undervalued option of acquiring credentials that can help them get jobs and higher education without compromising the value of the high school diploma.

So instead of making the diploma a participation trophy, guide students to choose an attainable option that still vastly expands their opportunities as opposed to dropping out.

I hope you will strongly consider these comments when making your decision. As a taxpayer and grandparent, I am asking that you leave the current policy in place.

Sincerely,

Denise Sanford 4933 Fernwood Dr Lake Charles, LA 70605 337 540-3976 Dsanford1953@me.com



AUG 8 2023

July 30, 2023 Louisiana State BESE 1201 N. 3rd Street Baton Rouge, LA 70802

RE: OFFICIAL PUBLIC COMMENT

Dear BESE:

In today's Times Picayune an article titled "BESE threatens to make diplomas meaningless" explained the BESE proposal to change the rules for obtaining a high school diploma. This letter is an Official Public Comment prompted by that article. Does the Board believe that Louisiana students are not capable of learning? That would be a terrible insult to the students. This state has a high poverty rate which some insist causes students to not learn as well as those not in poverty. Some very wealthy people who grew up extremely poor are: Oprah & Ralph Lauren, Larry Ellison (founded Oracle), David Steward (co-founder of World Wide Technologies, and others. These leader have proven that the desire to succeed is more important than a person's beginning bank account.

Does the Board believe that Louisiana teachers are not capable of teaching well? Our teachers are well trained dedicated professionals who need to be allowed to focus on the basics of education. Elevating reading, writing, math, science, civics, geography, and history should be the main focus of BESE so that students receive a formal well-rounded education. Ask teachers to spend class time on the basics and test scores will improve again!

I am requesting that the members of BESE not reaffirm the proposal that allows failing students to receive a diploma. Allowing students to 'pass' without requiring them to work for the passing grade hurts them and society because those students who can't pass the exit exam will not be prepared for the work force.

Respectfully,

Meredith Kettenring

Meredith Kettenring (former homeschool Mom & Paraprofessional at Mandeville Jr.) 320 De Zaire Drive Madisonville, LA 70447



AUG 8 2023



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AUG 7 2023

August 7, 2023

Board of Elementary and Secondary Education

Ms. Shan N. Davis Executive Director Board of Elementary and Secondary Education Box 94064 Capitol Station Baton Rouge, LA 70804-9064

RE: Public comment regarding Notice of Intent "Bulletin 741—The Louisiana School, District, and State Accountability System—Graduation Appeals Process (LAC 28: CXV.717, 2321, and 2322)" as published in the July 2023 edition of the Louisiana Register

Dear Ms. Davis:

This letter serves as public comment regarding the Board of Elementary and Secondary Education's (BESE's) Notice of Intent which is titled, "Bulletin 741—The Louisiana School, District, and State Accountability System—Graduation Appeals Process (LAC 28: CXV.717, 2321, and 2322)," as published in the July 2023 edition of the Louisiana Register.

I am writing on behalf of the Pelican Institute for Public Policy, Louisiana's leading freemarket think tank in Louisiana. The Pelican Institute believes every person should have the opportunity to flourish. Our mission is to research and develop policy solutions to address the most significant barriers to opportunity in Louisiana. We educate the public about the benefits of individual liberty and free enterprise, turning great ideas into powerful policy solutions that make a meaningful difference in people's lives. Given the critical importance of education to achieve this mission of opportunity and flourishing, it is a top priority for our organization and for the people of Louisiana.

Louisiana has long struggled to equip students with the knowledge and skills necessary to thrive and help our state flourish. Decades of low expectations, insufficient quality instruction, inadequate student supports and interventions, and limited educational options have contributed to our state ranking in the bottom of states nationally on a number of K-12 education indicators, even as some improvement has been realized over the years.

Current standards for student learning and high school graduation are yielding very concerning outcomes. Only 31% of Louisiana public high school students are proficient

in core academic subjects. Staggering numbers of public high school graduates require remediation: 41% in math and 25% in English for the Class of 2021, the year in which the most recent available data exist from the Louisiana Board of Regents.

And yet rather than studying and identifying the root causes of low academic performance among students and developing an evidence-based plan to help them meet and even exceed the current meager standard of "Approaching Basic"¹ on state tests (a standard that presently requires students to earn only 10-38% of total available points, depending on the test taken), BESE has proposed a workaround to give those same students a diploma without ever having to retake the test and meet the standard.

The workaround establishes the end goal as exiting high school and receiving a diploma, not preparing students to be truly "college and career ready." Our north star *should be* genuine readiness as students transition to post-secondary education and the workplace. Instead, the proposed policy change leverages creative, subjective grading of student portfolio projects rather than objectively measuring and certifying² that students have actually learned fundamental academic content.

In addition to having grave concerns about the proposed policy, we are also troubled by several specific aspects of the process that led to the initial approval of this Notice of Intent. Additionally, we have identified problems and inconsistencies in the actual policy language.

First, the process that led to this proposed policy receiving initial approval was not transparent. Discussion of this topic began with a concentration on a small group of students with extenuating circumstances—English learners who arrive shortly before high school graduation and have insufficient time in which to learn English and demonstrate their learning on state tests that are not offered in other languages. Neither the board nor the Louisiana Department of Education did a "deep dive" to fully understand what is or is not being done at the school level to support these students and to explore alternative options for them to demonstrate what they have learned.

To dig deeper into these questions, this past spring the board approved a motion to convene a group of stakeholders to study and make recommendations on this issue. That group was never convened. Data were never gathered and analyzed. Best practices were not highlighted to devise a statewide plan. National experts were not consulted. Instead, BESE members—in a rare move without a recommendation from the Department, and in fact with concerns expressed by the Department—expedited a brand new proposal to continue previous years' graduation waivers and authorize alternative paths to graduation for *all students*.

¹ BESE Bulletin 118, Section 6113, (B)(4): "Approaching Basic—students performing at this level have partially met college and career readiness expectations, and will need much support to be prepared for the next level of studies in this content area."

² Pelican acknowledges the important, continuous work of ensuring that state standardized tests are as valid and timely as possible and that students with disabilities and limited English proficiency may require alternative assessments as set forth in federal and state law.

Very little stakeholder input was solicited. Aside from one meeting of the Superintendents' Advisory Council which consists exclusively of traditional public school superintendents from across the state,³ no further opportunities were given for parents, advocacy organizations, educators, experts, colleges and universities, employers, and community leaders to weigh in. Those who serve on School Building Level Committees,⁴ which would bear the responsibility of implementing these new, detailed and time-consuming requirements at a time when schools are reporting significant certificated personnel shortages, were not consulted.

The state's longstanding Accountability Council and the College and Career Readiness Commission, which exist to study and weigh in on related matters and include parents, educators, college and university leaders, employers, workforce experts, and public policy research organizations, were also not engaged. There are legal questions as to whether BESE followed its own regulations and federal laws that require consultation with parents and education practitioners before altering policy having implications for the state's school and district accountability system.

The proposed policy also raises significant concerns about potential conflicts of interest related to school accountability. Graduation isn't just about students exiting high school and earning a diploma; it also factors heavily into school performance scores and ratings. Those scores and ratings, among other things, lead to the formal identification of schools as needing improvement, schools that are subjected to state intervention, and schools that are eligible for federal school improvement funding. Graduation rates comprise 20% of high school performance scores. In addition, when students earn a diploma, they generate 100 points in the "strength of diploma" index of the high school rating system. Thus, the ratings lead to ample incentives for the system to "graduate" as many students as possible, regardless of the standards.

Finally, the policy language as proposed contains different requirements for two groups of individuals ("the freshman cohort entering 2022-2023 and beyond" and "the freshmen cohort prior to 2022-2023" with no specified start date for eligibility) and contains undefined terms, requirements to report data that do not exist, and concerning limits on the state's ability to audit implementation and exercise oversight. Specific problematic provisions are outlined in the enclosed document for your review and consideration.

One notable provision requires the Department to create detailed rubrics for each tested subject that guides educators in determining "content proficiency" as they grade students' portfolio projects. However, the term "content proficiency" is undefined. Is it intended to

³ Note that the Superintendents Advisory Council initially expressed grave concerns about the first version of this proposed policy when it applied to only English learners, but later endorsed a substantially similar proposed policy that would extend eligibility to all students.

⁴ Bulletin 1508, Section 303, (A) provides that School Building Level Committees must include as standing members the principal or his/her designee, a classroom teacher, and the referring teacher. The Department, through official guidance to school systems, additionally recommends involvement by the school's social worker, counselor, nurse, interventionist, and 504 coordinator.

be synonymous with the current graduation assessment requirement of "Approaching Basic?" Or is it intended to have the same meaning as "proficiency" as currently defined in Bulletin 118 Section 6113(B)(2), which is "Mastery?"⁵ What will be the proficiency level of these new "graduates?" If they failed the LEAP exams administered in the 9th and 10th grades, will Louisiana be awarding diplomas to students on an 8th grade level? Even more concerning, if these students were promoted to high school after scoring *below* Mastery (proficiency) in the 8th grade, will BESE, through this new policy, grant diplomas to students functioning on a 7th grade level in math and/or English?

Louisiana is struggling. While our neighboring states' economies are booming, we are experiencing the worst run of out-migration in almost 20 years. Families and businesses are leaving in search of greater opportunity, and much of that is tied to the need for a quality education system that empowers individuals to reach their full potential and provides a talented, skilled workforce. Enacting the proposed high school graduation policy may serve some individuals in the short-term, but it will not increase opportunity in the long-run. Simply put, students who fail our state tests at the lowest levels are not ready to undertake challenging college (1- year, 2-year, or 4-year) programs, nor will they be able to thrive in the workforce and earn a living wage. Their opportunity will be significantly limited.

We respectfully request that the Board hold a public hearing to gather additional stakeholder input and either modify or defer, indefinitely, the proposed policy to address the above concerns. We also urge the Board to charge the Department with proposing a thoughtful, comprehensive, evidence-based plan to address the needs of struggling students so they can truly become college and career ready. With a strong plan in place, BESE can exercise oversight to ensure its successful implementation and positive outcomes for Louisiana's students.

Thank you for the opportunity to comment on this proposal and for your consideration of what is in the best interest of Louisiana's students.

Sincerely,

Erin Bendily, Ph.D. Vice President for Policy and Strategy Pelican Institute for Public Policy

Enclosure

⁵ Bulletin 118, Section 6113, (B)(2) "Mastery (Proficient)—students performing at this level have met college and career readiness expectations, and are prepared for the next level of studies in this content area."

Pelican Institute concerns with BESE's proposed "Revisions to Bulletin 741, The Louisiana Handbook for School Administrators, regarding an appeals process for all students, as it relates to graduation assessment requirements," as approved as Notice of Intent on June 13-14, 2023

Bulletin 741, Section 717:

- (B)(2)(a) and (b) requires LDOE to report to BESE data that do not exist:
 - Percentage of college enrollment after high school exit of non-graduates in each respective graduation cohort
 - Percentage of employment after high school exit of non-graduates in each respective graduation cohort
 - To obtain this data would require updating R.S. 17:3914, collecting student/parent signatures to authorizing the sharing of personally identifiable information between LDOE and the Louisiana Workforce Commission, and possibly additional funds/personnel or contractor time to conduct the matching, analysis, and reporting required
- (C)(1)(h) contains a reference to "immigrants" that could be problematic because related information is limited and, pursuant to federal laws and regulations, LEAs are not permitted to ask or collect information on students' immigration status. They can request and report on the student's country of origin and date of U.S. entry, but a student's parent or legal guardian may not always supply that information.
- (C)(2) refers to a school serving a "unique population," saying that if such a school is in compliance with appeals eligibility requirements, it "shall be exempt from consecutive audits."
 - The term "unique population" is undefined. Does this mean EL students? Students with disabilities? Students having 504 plans? Students who are homeless, economically advantaged, dyslexic? Louisiana has several "unique population" schools, including those that serve students with disabilities, dyslexic students, students referred for disciplinary reasons or significant academic deficiencies (alternative schools), and academically gifted students.
 - This language prohibits the LDOE from performing consecutive audits based on a single initial check for compliance with eligibility requirements. A school could engage in future questionable practices, yet be shielded from LDOE audits to address concerns and follow up to ensure appropriate resolution. If a report is made regarding questionable or concerning actions in the future, the LDOE would lack the authority to investigate.
- (C)(3) refers to the state superintendent of education being a "final authorizer" for a school site that has had an initial audit yielding discrepancies. It is not clear what "final authorizer" means, nor what being a "final authorizer" empowers or charges the state superintendent to do. The word "authorize" is not defined, nor is it generally understood by LEAs beyond activities associated with charter school authorization.
- (D)(1)(c) refers to "evidence of content proficiency," another undefined term. Throughout other BESE bulletins, "proficiency" refers to performance at the Mastery level on LEAP assessments. Is that what is implied here? This sentence also refers to a "state assessment requirement," and it is unclear whether LDOE is being required to develop or designate a new state assessment for this purpose.

(E) fails to show that this is current policy (currently "B." in Section 717) that is
proposed to become a new Subsection E. There should be a strikethrough in the current
"B." Furthermore, this language refers to the completion of an outdated, non-existent
"options program" and "options program skill certificate" that does not exist anymore.
Therefore, that language should be repealed, not preserved or relocated within this
Section.

Bulletin 741, Section 2321:

- (A) requires School Building Level Committees (SBLC) to determine whether students are eligible to appeal assessment requirements for purposes of graduation and implement this policy. Many SBLC coordinators already report being stretched thin and unable to adequately address the needs of all students identified with special needs (particularly 504 plans). This will place significant new requirements and workloads on SBLC coordinators and SBLC members (school leaders, counselors, and teachers) throughout Louisiana's high schools.
- (C) instructs LDOE on which diplomas "shall be considered regular purposes in the state and district accountability system." (There is another reference to accountability in Subsection (F)). Pursuant to Bulletin 111, Section 103, proposed policies related to federal programs (including the Elementary and Secondary Education Act as most recently amended by the Every Student Succeeds Act, which requires and funds states to support all students in achieving the state's rigorous academic standards as measured by the same assessments of student learning) and the state accountability system must be presented to the state Committee of Practitioners (Louisiana's Accountability Council) "before publication, proposed or final State rule or regulation." This item was not referred to the Accountability Council for input prior to being voted upon by BESE. Furthermore, Section 1603 of the federal Elementary and Secondary Education Act requires states to "ensure that any State rules, regulations, and policies relating to this title conform to the purposes of this title and provide any such proposed rules, regulations, and policies to the committee of practitioners created under subsection (b) for review and comment....(3) The duties of such committee shall include a review, before publication, of any proposed or final State rule or regulation pursuant to this title."
- (D)(1)(b)(iii) requires students to "demonstrate mastery of specific employability skills," but it is unclear whether merely "earning" an industry-based credential is sufficient to "demonstrate mastery" of specific employability skills. Further, this language refers to IBCs "outlined in Bulletin 741, Section 2319," but Bulletin 741, Section 741 does not outline any IBCs. It is unclear which IBCs are being referenced, or if all/any IBC is considered sufficient to signify mastery of employability skills at any level of employment, even if there is no corresponding employment opportunity that affords an individual to earn a living wage.
- (D)(1)(c) references "content proficiency," but this term is undefined. As stated above, in
 other references to "proficiency" in the BESE bulletins, this term is the equivalent of
 Mastery on the state LEAP assessment.
- (D)(1)(c)(ii) also references a "content proficiency requirement, as measured by the LDOE standardized rubric." Again, "content proficiency" is undefined, and the reference to a rubric seems to require LDOE to provide a rubric for use in grading students"

portfolios of work. It is unclear how the LDOE will ensure that use of such rubric is "standardized" across the state, particularly given the LDOE's limited authority to audit, as grading will be subjective by teachers or other school staff. LDOE will need to develop and implement such a rubric for all six high school courses for which a LEAP end-of-course exam exists, and they will need to be aligned to Louisiana State Standards. This represents a significant amount of time and resources to develop, test, implement, monitor, ensure "content proficiency" (whenever and however that term is ultimately defined), and ensure "standardized" use.

- (D)(1)(c)(iii) references "students entering the freshmen cohort prior to 2022-2023," but it is not clear how far back this policy reaches in terms of eligibility. Could a student who graduated 20 years ago be eligible to receive a diploma by following this requirement? 10 years ago? Five years ago? Does the provision apply as far back as there has been an assessment requirement for graduation in Louisiana? It is also important to note the inequity of having two different standards—one for students entering the freshman cohort prior to 2022-2023, and another for the freshman cohort entering 2022-2023 and beyond—with differing requirements for earning a diploma.
- (E)(1)(a) references "appropriate academic supports," but there is no guidance or definition as to what is considered appropriate or when (how quickly after the student fails to meet an Approaching Basic standard on the LEAP end-of-course exam) such supports are to be provided to students. (E)(1) alludes to several interventions and supports for students who are not able to achieve the Approaching Basic standard, but there is no requirement that students receive them in a timely manner or that students retake the LEAP end-of-course exam upon their completion to retake the exam in an effort to achieve the required score. In other words, with this new proposed policy, there is no longer an expectation that students ever retake the LEAP end-of-course exam, even once.
- (E)(1)(c) introduces a new requirement for LDOE to make available to LEAs a list of strategies and technical assistance for at-risk students. It is unclear whether this expectation includes local, community-based resources which could be quite voluminous for every high school in the state.
- (E)(1)(d) requires LEAs to schedule between students involved in the proposed appeals
 process with a Workforce Innovation Opportunities Act (which should be *Workforce Innovation and Opportunity Act*) provider, Vocational Rehabilitation Services provider,
 or other local career support agency and its affiliated providers, but most of these
 programs require that students be of legal age and no longer in high school. This could be
 construed as requiring transportation to an off-site location where minor students would
 be required to meet with an unauthorized adult (possibly one who has not undergone a
 background check), provide personally identifiable information, and apply for
 government services without the consent of a parent or legal custodian.
- (F)(1) provides a list of factors that the SBLC "may consider" in determining an appeal decision, but it is not clear why or how it would choose to consider or not consider these factors for some but not all students uniformly. Additionally, this makes reference to students meeting requirements only in Subsection D, not also Subsection E where important factors like completion of academic supports, remedial or co-requisite instruction, and dropout prevention and mentoring services. Student completion of and progress arising from those activities should also be considered in making a decision as to whether a student needs to be granted an appeal or needs to re-attempt the regular

graduation requirements. A similar provision that fails to include consideration of these factors is contained in (G).

- (F)(1)(f) refers to the "strength" of an attained IBC, but that term is undefined and it is
 unclear which IBCs are intended to be acceptable (strong enough) and which are not,
 ranging from regional credentials to statewide basic credentials to statewide advanced
 credentials. It references the Strength of Diploma index in the School and District
 Accountability System, but gives no guidance as to what level is expected.
- Similarly, (F)(1)(g) refers to "overall preparedness for postsecondary success" is also undefined. It is unclear whether the intent is that students be "prepared" to enter postsecondary education without the need for remediation or co-remediation or whether students must simply meet postsecondary admissions requirements, which could still render students needing to undergo remediation or co-remediation.



10 PARISHES Jefferson Orleans Plaquemines St. Bernard St. Charles St. James St. John the Baptist St. Tammany Tangipahoa Washington

August 7, 2023

Shan Davis Executive Director, Board of Elementary and Secondary Education Suite 5-190, 1201 North Third Street Baton Rouge, LA 70802

Re: LEAP Test Graduation Waiver Option - Public Hearing Request

Dear Shan Davis:

On behalf of Greater New Orleans, Inc. (GNO, Inc.), I write this letter to recommend that the Louisiana Board of Elementary and Secondary Education (BESE) hold a public hearing on the recently proposed revisions which create a universal appeals process for high school graduation. Published in the Louisiana Register on July 20, the revisions seek to create an alternative evaluation method by which a student in their senior year who fails to achieve a "passing" score on the end-of-course exam in a testing pair may demonstrate proficiency using a portfolio of work that meets the content proficiency requirement. As the strength of the high school diploma is directly related to the strength of our workforce pipelines, the language of the proposed rule necessitates more public input from workforce development leaders and employers; thereby, GNO, Inc. requests that BESE hold a public hearing on the adoption of the rule.

A high school diploma signals readiness to employers, demonstrating that students have gained the knowledge and skills needed to transition to college or the workforce. Assessment of the knowledge and skills a student has learned must serve as an *objective* signal to employers or higher education institutions. Informed by our extensive programming experience in workforce development, while GNO, Inc. is sympathetic to the concerns of testing accessibility and capability, we firmly believe that employers and the business community at-large should have the opportunity to participate in a public discussion about this topic. Therefore, I deliver this letter to request that BESE hold a public hearing to remediate the concerns of a subjective measure in its pursuit to promulgate rules that address the foundational concerns of accessibility for students with intellectual disabilities or learning barriers.

I respectfully request your consideration to hold a public hearing on the proposed rules for high school graduation waiver options and hope that you conclude it is worthy to gather more public input to promulgate the most appropriate rules for Louisiana students.

Sincerely

Michael Hecht⁴ President and Chief Executive Officer

1100 Poydras Street, Suite 3475, New Orleans, LA 70163 Phone: 504.527.6900 Fax: 504.527.6970 www.gnoinc.org AUG 0 8 2023

BESE Board Executive Director August 3, 2023

RE: Proposed High School Diplomas Changes

Your proposed rules change on July 20th for high school diplomas when graduation tests are failures is terrible. BESE should be ashamed as I am that such a proposal has reached this stage. The standards are already very low and you want to lower them more is horrible.

These exceptions like "portfolio of work" that approximates the content proficiency requirement is a lousy effort to have some meaning. Of courses teachers will be lenient for many reasons none of which are justified. Even when teachers fail someone they may get their arm twisted by fellow teachers or superiors. Why, because pur school rating is more important than ensuring the students achieve a proficient and solid education and a diploma that means something.

When kids are struggling in school their grades should reflect that. Discussions with students should be held to help identify problems. If kids complain about outside jobs/responsibilities, etc then the school should verify the extent of that with calls to parents/guardians and/or employers if necessary.

Part of high school learning is to help prepare students for the next challenges in life and adulthood. When you treat these 17 and 18 year old like 4th graders then you have failed to do your job. Unsatisfactory work will not cut it in the real world.

There is a tendency to blame so much loss of learning on Covid restrictions. Graduation tests should have been given and recorded in the spring of 2020 and also in the spring of 2021. If the scores decreased there would be data for reference and future plans. Sure they could have gone into the record books with asterisks and exceptions could have been made. Now we only have speculation what a shame. But you have to be careful with those exceptions. In the fall of 2022 we had a hurricane in SE Louisiana and you made exceptions. However, exceptions were made for high school passing of students who failed but they lived in Lafayette Parish. This parish had no damage and no long closures.

Wayne Colvir Wayne Colven

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AUG 0 8 2023

David and Judy Garic 23335 N. Rian Dr. Covington, LA 70435

August 3, 2023

BESE PO Box 94064 Capital Station Baton Rouge, LA 70804

Attention: All members of the BESE Board of Directors

Subject: Official Public Comment re: proposed rules change regarding allowing students to get high school diplomas.

This proposed rules change further degrades our already low educational standards in Louisiana and we are opposed to it. Though we doubt the La. Legislature would allow this to become enacted, we expect that members of the board will have the good sense to defeat it before it can be endorsed and moved forward.

We can't imagine why a body devoted to advancing education would consider such a rules change—unless it is satisfied to remain near the bottom of educational achievement as a state.

Again, we strongly oppose this proposed rules change.

Respectfully, Garia Darie

David and Judy Garia

August 5, 2023 3915 Saint Charles Ave. Apt 714 New Orleans, Louisiana 70115-4664

Shan N. Davis Executive Director Board of Elementary and Secondary Education Post Office Box 94064 Capitol Station Baton Rouge, Louisiana 70804-9064.

Re.: Proposed Revisions - Bulletin 741, Louisiana Handbook for School Administrators, Sections 717, 2321 and 2322

Gentlemen.

I am writing you regarding the proposed revisions to the Louisiana Handbook for School Administrators, Sections 717, 2321 and 2322, which will provide for an appeals process, as it relates to graduation assessment requirements for all students in Louisiana.

I strongly encourage BESE to reject the proposed revisions for the following reasons:

- It will be a major disservice to students who will be awarded a diploma that does not signify the student has acquired the minimum skills required by other students who do not need to appeal.
- By boosting graduation rates, it allows a failing school's faculty to evade accountability for bad results.

Unfortunately, Louisiana ranks near the bottom of the states in educational achievement and theses revision will do nothing to improve the ranking.

AUG 0 8 2023

Board of Elementary and Secondary Education Very truly yours,

Raymond J. Serpas

Raymond J. Serpas

JOSEPH E. ZEHNER, JR. 3806 TAFT PARK METAIRIE, LA. 70002 1 AUGUST 2023

LOUISIANA STATE BOARD OF ELEMENTRY AND SECONDARY EDUCATION 1201 North Third Street Baton Rouge, La. 70802

Attention: Mr. James Garvey

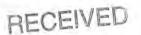
Dear Mr. Garvey,

I have read with concern an article in the Sunday July 30, 2023 edition of The Times-Picayune entitled "BESE threatens to make diplomas meaningless". The article states, in part: On July 20, BESE officially published a proposed rules change that would allow students to get high school diplomas even if they repeatedly fail the state's graduation tests.

I ask that you do not support this rules change as it will devalue all diplomas issued to students who successfully did pass the graduation test. It will not benefit the student receiving such a diploma and will certainly will not allow potential employers to fairly make choices on hiring.

This arrangement will not benefit the State of Louisiana in any way. I ask that you will reject this proposed rules change.

Best regards, Joseph



AUG 0 8 2023



August 7, 2023

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AUG 0 8 2023

Board of Elementary and Secondary Education

Ms. Shan N. Davis Executive Director Board of Elementary and Secondary Education Box 94064 Capitol Station Baton Rouge, LA 70804-9064

RE: Public comment regarding Notice of Intent "Bulletin 741—The Louisiana School, District, and State Accountability System—Graduation Appeals Process (LAC 28: CXV.717, 2321, and 2322)" as published in the July 2023 edition of the Louisiana Register

Dear Ms. Davis,

This letter serves as public comment regarding the Board of Elementary and Secondary Education's (BESE's) Notice of Intent entitled, "Bulletin 741—The Louisiana School, District, and State Accountability System—Graduation Appeals Process (LAC 28: CXV.717, 2321, and 2322)," as published in the July 2023 edition of the Louisiana Register.

My name is Katherine Munal, Legislative Director, Gulf Region at ExcelinEd in Action. Our national organization works with state lawmakers and partner organizations to adopt student-centered policy solutions that empower families with educational opportunity, prepare students for college and careers, prioritize early literacy grounded in the science of reading, expand innovation and strengthen school performance.

We formally <u>oppose</u> BESE's proposed graduation appeals process, which makes harmful changes to the state's graduation requirements. The new appeals process would lower the bar for graduates, put them at a disadvantage and harm those students who need the most help.

Quality assessments serve a real purpose, as they measure student achievement and ensure students are prepared to succeed in postsecondary education and careers. Under BESE's proposed policy, these assessments would become effectively meaningless. The policy would allow high school seniors to apply for a waiver of the basic graduation requirements, allowing them to receive their diploma without ever having to pass the LEAP exam.

The proposed policy is being framed as a way to assist students who struggle with assessments. However, all of the requirements under the new pathway would still require testing, but using different assessments and often with a lower bar. Further, most of the options that allow a student to demonstrate employability are already included under the TOPS Tech diploma. This essentially would allow "double-dipping" of measures to meet these lower expectations—rather than requiring students to demonstrate readiness in new, alternate ways.

<u>www.ExcelinEdinAction.org</u> | <u>Info@ExcelinEdinAction.org</u> 850.391.4090 | P.O Box 10691 | Tallahassee, FL 32302 <u>ExcelinEd in Action is a 501(c)4 nonprofit organization</u> Louisiana's longstanding academic standard for public school graduation currently requires students to earn a score of "Approaching Basic," which is only one level above failing. Moving this relatively low bar even lower will hinder Louisiana's ability to ensure students are ready for college and career by the time they graduate high school. It will also increase the number of graduates who will require remediation as freshmen in college.

In addition, these proposed changes would create a lower-tier pathway, with at-risk students likely being funneled into this pathway early on. This means they will miss out on important opportunities that could change their future options in terms of college and pathways to higher quality, higher wage careers.

Louisiana's leaders must ensure students are prepared to successfully compete with their peers across the nation and around the world. This is vital to strengthening the state's economy, where employers are currently struggling to find graduates with basic education and workforce skills.

ExcelinEd in Action believes that rigorous classroom expectations coupled with accountability for student results are powerful strategies for strengthening education. Together they serve as valuable tools to guarantee all students receive a quality education.

We urge the board to consider these concerns and vote <u>against</u> the proposed changes as a final rule. Ensure that Louisiana's standard high school diploma remains meaningful and retain the state's graduation exit exam requirements.

Thank you for your consideration and the opportunity to comment on this proposed policy.

Respectfully,

Katherine Munal Legislative Director, Gulf Region ExcelinEd in Action

8.1.23 NATHALIE SIMON DEAR BESE MEMBERS PLEASE VOTE NO ON PASSING STUDE VTS AND PROVIDING DIPLOMAS DESPITE! PASSING TESTS. PLEASE DON'T SET OUR STUDENTS UP FOR FAILURE. DESERVE MORE. THE K VOV, AUG 0 8 2023 Board of Elementary attalu, and Secondary Education 522 MONTEGUT NEWORLEANS

ATTACHMENT #5

Public comment cards from public hearing

PUBLIC COMMENT CARD STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION	PUBLIC COMMENT CARD STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION 3	
DATE: 8/25/23	DATE: 8/25/23	
NAME: Dr. Erin Bendily	NAME: Kelli Bottger	
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ATTACHMENT #6

Unofficial minutes of public hearing

Louisiana State Board of Elementary and Secondary Education Public Hearing Friday, August 25, 2023 2:00 p.m. Minutes

The public hearing regarding revisions to Bulletin 741, *Louisiana Handbook for School Administrators,* was held on Friday, August 25, 2023, in the Louisiana Purchase Room, located in the Claiborne Building in Baton Rouge, Louisiana. The meeting was called to order at 2:04 p.m. by Dr. Holly Boffy. Board members present were Mr. Preston Castille, Dr. Belinda Davis, and Mr. Ronnie Morris.

Representing the Louisiana Department of Education was State Superintendent of Education Cade Brumley.

Representing the Board staff were Board of Elementary and Secondary Education (BESE) Executive Director, Ms. Shan Davis, and Ms. Shannon Rawson, who recorded the minutes.

Dr. Boffy advised the audience that this public hearing was being held in order to receive public recommendations and input regarding revisions to Bulletin 741, *Louisiana Handbook for School Administrators*. She stated that a report of comments will be composed for the Board's consideration. The Board will consider the revisions to Bulletin 741, *Louisiana Handbook for School Administrators*, at its October 2023 meeting.

Dr. Boffy asked persons interested in addressing the issue at hand to fill out a comment card and stated that those wishing to speak could only make recommendations for Bulletin 741. No other comments are to be received at this time. No Board discussion will occur in response to the comments.

Comments in opposition were received from Dr. Erin Bendily, Pelican Institute; Ms. Kelli Bottger, LA Kids Matter; Mr. Brian Davis, Louisiana Association of Business and Industry; Mr. Barry Erwin, Council for A Better Louisiana; Ms. Millie Harris, JCFA; Mr. Terrence Lockett, Education Reform Now; Ms. Liz Smith, Baton Rouge Alliance for Students; and Ms. Barbara Adams Jones, Ms. Bridgitte Nieland, and Mr. T. David Pearce, concerned citizens. Comments with information only were received from Mr. Leo John Arnett, Greater New Orleans, Inc.

Comments in support were received from Dr. Erin Atkins and Ms. Layne Edelman, Acadiana High School; Mr. Taylor Castillo, Our Voice Nuestra Voz; Ms. Morgan Cerniglia, Concordia Parish School Board; Ms. Cheruba Chavez and Ms. Emma Merrill, EXCELL Coalition; Dr. Belinda Davis, BESE Member at Large; Ms. Katelyn Deville and Ms. Monique Roberts, Calcasieu Parish School Board; Ms. Suzanne Harris, Dr. Tia Mills, and Mr. Marcus Thomas, Louisiana Association of Educators; Dr. Ken Oertling, Louisiana Association of School Superintendents; Ms. Angela Ramirez, Puentes New Orleans; Mr. Cesar Rico, East Baton Rouge Parish School System; and Ms. Skarleth Aguilar Amaya and Ms. Alexandra Sanchez, concerned citizens.

With no further business to come before the Public Hearing, the meeting was adjourned at 3:24 p.m.

ATTACHMENT #5

Public comments received in response to public hearing

SUPPORT



AND EQUAL ACCESS FOR ALL STUDENTS

Telephone 337-332-2105 Fax 337-332-3050

FREDERICK WILTZ SUPERINTENDENT

RUSSEL C. FOTI PRESIDENT

MARK HEBERT VICE PRESIDENT

DISTRICT 1
 STEVE FUSELIER

DISTRICT 2
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DISTRICT 9
 MARLIN D'AUGEREAU

DISTRICT 10
 MARK HEBERT

St. Martin Parish School Board

P. O. Box 1000 Breaux Bridge Louisiana 70517

August 18, 2023

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Frederick Wiltz, and I am Superintendent in St. Martin Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only eight (8) states, including Louisiana, require standardized test performance for graduation, but even the seven (7) other states have expanded criteria or an appeals process of this requirement.

It is a Louisiana-imposed requirement - not federal - that students must "pass a test" to be eligible for graduation. Forty-two (42) states do not have this requirement. The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Frederick Wiltz





AND EQUAL ACCESS FOR ALL STUDENTS

Telephone 337-332-2105 Fax 337-332-3050

FREDERICK WILTZ SUPERINTENDENT

RUSSEL C. FOTI PRESIDENT

MARK HEBERT VICE PRESIDENT

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DISTRICT 10
 MARK HEBERT

St. Martin Parish School Board

P. O. Box 1000 Breaux Bridge Louisiana 70517

Kevin Dugas 600 Corporate Blvd. Breaux Bridge, LA 70517

August 18, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Kevin Dugas, and I am the Supervisor of Testing and Accountability for St. Martin Parish. I am writing **in support of the EXCELL Appeals Process**. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma. Passing a test in order to graduate is a Louisiana-imposed requirement, not a federal mandate. Only eight states, including Louisiana, require standardized test performance for graduation, however the seven other states have expanded criteria or an appeal process of this requirement. The EXCELL Appeals Process does not weaken the distinction of a high school diploma in Louisiana. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units in order to earn their diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please <u>support</u> the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

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Daimont Staples 4352 Marais River Drive Slidell LA, 70461

August 17, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Daimont Staples and I am an Educator. I reside in St. Tammany Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I represent students in Orleans Parish. As an educator in the Louisiana school system for over a decade, I recognize the doors that open once a student obtains a high school diploma. As a teacher for countless English-Language Learners, I know they would have benefited from this opportunity.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable colution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. Lask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely.

Daimont Staples 10+ Years Educator in Louisiana Advocate for Students



AUG 2 3 2023

Charisse Guidry 301 Westmeade Drive Gretna LA 70056 8/18/2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 RECEIVED

AUG 2 3 2023

Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Charisse Guidry, and I am an Educator in Orleans Parish. I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Supporting Excell through the implementation of the EXCELL Appeals Process is a crucial step towards addressing the significant challenges faced by English Learners (ELs) in Louisiana and promoting overall educational equity. The LEAP exam has historically acted as a barrier to graduation for ELs, contributing to Louisiana's distressingly low graduation rate for these students, which stood at just 41% pre-Covid. The disparate impact of the LEAP exam on ELs became even more evident following the COVID waivers of 2020 and 2021, highlighting the urgent need for a more inclusive approach.

The EXCELL Appeals Process offers a lifeline to a diverse group of students who face unique challenges. Students with learning disabilities, those dealing with acute health conditions testing anxiety, and those who are also parents will greatly benefit from this process. It recognizes that traditional testing methods might not accurately reflect their true academic capabilities. By providing an alternative, yet equally rigorous, method to demonstrate mastery of academic standards, the EXCELL Appeals Process levels the playing field and ensures that these students have a fair opportunity to showcase their potential.

Beyond individual student benefits, the EXCELL Appeals Process addresses broader societal issues. Louisiana's high "youth disconnection rates" underscore the urgency of equipping students with the skills and qualifications needed for meaningful engagement in the workforce and economy. The process requirement of evidence of employability through objective measures such as the Silver WorkKeys certificate, TOPS Tech eligibility, or Jumpstart-approved Industry. Based Credentials ensure that students are not just leaving high school but leaving with the tangible skills required to contribute to the workforce immediately.

Unlike the LEAP exam, which doesn't adequately measure workforce readiness, the EXCELL Appeals Process aligns education with practical outcomes. By preparing students to enter the workforce or pursue post-secondary technical training, the process not only reduces the number of disconnected youth but also fosters a workforce that is truly ready to contribute to the local economy. It bridges the gap between education and employment, setting students on a trajectory towards success.

In conclusion, supporting Excell's EXCELL Appeals Process is a step towards rectifying longstanding inequities in education, providing a fair chance for students facing challenges, and aligning educational outcomes with workforce readiness. This innovative approach recognizes the diversity of student experiences and aspirations. ultimately building a more inclusive and economically empowered future for Louisiana's youth. Lisa Staples 4352 Marais River Drive Slidell, LA 70461

August 17, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Lisa Staples and I was a 2022-2023 Louisiana Educator Advocacy Development (LEAD) Fellow for the Stand for Children organization in Louisiana. I reside in St. Tammany Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As a first-generation college student whose parents are from El Salvador (Central America), l recognize first-hand the importance of gaining a high school diploma. As someone who now has a master's degree, education is vital for success.

Additionally, only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process for this requirement.

It is a Louisiana-imposed requirement - not federal - that students must "pass a test" to be eligible for graduation. 42 states do not have this requirement; see source <u>HERE</u>.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Lisa Staples, MPH

2022-2023 LEAD Fellow – Stand for Children First-Generation College Student Proud Mom of Two Children under 5 Years Old



AUG 2 9 2023

August 16, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Anamaria Villamarin-Lupin, and I am a parent in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely

Anamaria Villamarin-Lupin, LCSW-BACS 535 Arabella St New Orleans, LA 70115



Alice Garcia Ph.D. 6353 Muir St. Baton Rouge, LA 70817

August 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Dr. Alice Garcia, and I am an advocate and educator in Louisiana.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

From 2013-2023, I have worked first as a classroom teacher, then an LDOE employee. In each instance, I was a strong advocate for English learners (ELs) and upon coming to LDOE in 2017, I made it my own personal mission to make changes to the assessment requirement for graduation. Nearly every 3-6 months, I would present a case with data around how the assessment requirement is creating an inequitably education experience for ELs. I also mentioned how Louisiana is one of only a few states that requires these assessments for graduation and how we are creating a possible civil rights violation. When I could not move any further with my own imitative from within LDOE, I left but wish to continue my support from outside state government or the classroom. I know that the EXCELL pathway is not lowering the standard for any student, and that we are instead setting students up for college and/or career by removing this obstacle to graduation.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Alice Garcia

Dr. Alice Garcia

RECEIVED

AUG 2 3 2023



August 17, 2023

Shan Davis, Executive Director Louisiana Board of Elementary and Secondary Education (BESE) P.O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: SUPPORT for Revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis and Members of BESE,

I am writing as a business owner, employer, and somebody who works with hundreds of educators, employers, parents, and young people as my clients each year. At ResourceFull Consulting, our vision is for every child to have the resources and support to pursue their dreams and contribute to their communities. This requires not just hardworking individuals and partnerships across the public, private, and nonprofit sectors. It also requires smart policy.

The EXCELL Appeals Process is an example of smart policy. I am writing in full support of the EXCELL Appeals Process as designed and approved at the June BESE meeting. The process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma. It was designed because too many of our children complete coursework but do not receive a high school diploma because they struggle to pass one particular test, which ultimately impacts their workforce participation and ability to contribute to our economy and community.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma. Students must still earn all required Carnegie Units and students who appeal must complete a portfolio and demonstrate workforce readiness on measures that are widely accepted and used in the field and in most other states. It makes sense. And it addresses the fact that only 40% of our English Learners graduate high school, leaving Louisiana with the lowest high school graduation rate for English Learners in the nation. In many instances, these are brilliant and gifted young people who have much to contribute to our workforce but struggle to pass one exam that is only offered in English.

I strongly support the EXCELL Appeals Process and ask that you please support it. Thank you for your thoughtful consideration of this and ongoing leadership to advance what's best for the educators, children, and families in Louisiana.

Sincerely,

Hamilton Simons-Jones Principal | ResourceFull Consulting AUG 2 % 2023

Board of Elementary and Secondary Education

2555 Verbena Street | New Orleans, LA 70122 www.ResourceFullConsulting.com Meagan Mills Airline High School Bossier Parish

August 16, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Meagan Mills, and I am a senior counselor in Bossier Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

We have a plan in place for students with learning disabilities. It would seem that since these students are enrolling in public school with very limited, if any, English language skills, that this state would recognize this need and not prohibit these students from the potential of success that earning a high school diploma affords.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely. meagan mes

Meagan Mills Senior Counselor Airline High School



August 17, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Carolyn P Jones, and I am a resident of St. Tammany Parish and a member of the Board of Directors of Louisiana Teachers of English to Speakers of Other Languages (LaTESOL).

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

- The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.
- A diploma indicates completion of a course of study; however, a transcript can show a student's achievement through other metrics like rigor of coursework (honors, AP), GPA, and endorsements.
- Students who appeal the assessment requirement have to complete a portfolio to show competency in <u>both</u> areas of an assessment pair, a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.
- A diploma earned through appeal will demonstrate an <u>objective measure of</u> evidence of employability in addition to the standard requirements of Carnegie Units (see more on this requirement below)
- The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.
- Students who appeal will leave high school with the skills needed to immediately enter the economy or pursue post-secondary technical training. Currently, students who don't "pass" the LEAP are drop-outs.

RECEIVED

AUG 2 2 2023

CAROLYN P. JONES, CPA

156 Wisteria Ln Mandeville, LA 70448

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Carolyn Jones Carolyn P. Jones, CPA



201 Stadium Drive Houma, LA 70360 (985) 876-7400 / www.tpsd.org

Engage, Educate and Empower Every Student, Every Day

August 18, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Bubba Orgeron, and I am the Superintendent of Schools for Terrebonne Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement. Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Bulla Chousen

Bubba Orgeron, Superintendent of Terrebonne Parish School System

RECEIVED

AUG 2 4 2023

Board of Elementary and Secondary Education

Excellence in Education with a Commitment to All AN EQUAL OPPORTUNITY EMPLOYER

Loranger High School

Home of the Wolves



Mrs. Amber Anthony, Principal 19404 Hian Street Post Office Box 560 Loranger, Louisiana 70446 Phone 985 878-6271 FAN 985 878-4875



August 18, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Amber Anthony, and I am a Principal in Tangipahoa Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

There are several reasons that I am in favor of implementing the EXCELL Appeals Process. Louisiana is the only state that requires a standardized test to graduate but does not have an appeals process in place. This is a barrier for students with disabilities who may not have been identified or qualify for an IEP. Students with testing anxiety or demanding family responsibilities are also at a disadvantage. The EXCELL Process puts a "safety net" in place and also provides for the demonstration of workforce readiness. Through the use of this process students will be equipped for the workforce and ready to participate in the state's economy in a positive way. These students will be afforded the opportunity to work their way up out of entry-level positions with a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Amber L. anthony

Amber L. Anthony, Principal Loranger High School

RECEIVED

AUG 2 2 2021



1600 North 7th Street · West Monroe, Louisiana 71291 · Phone: (318) 432-5000 · www.opsb.net

Todd Guice Superintendent

guice@opsb.net 318-432-5204

Mr. Todd Guice 1600 North 7th Street West Monroe, LA 71291

Friday, August 18, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Todd Guice, and I am the Superintendent of Schools in the Ouachita Parish School System.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The Department of Education created ACT 833 to help special needs students as identified in Bulletin 1508 eliminating the requirement to pass standardized tests; however many students who are not identified as special needs struggle with standardized test taking and fail to graduate high school because of this dire need of help. The EXCELL Appeals Process still requires the students to perform and considering the Jump Start TOPS TECH Pathway, component three of the EXCELL Appeals Process will require students to obtain an industry- based credential which assesses both their knowledge and their ability for work readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

od This

Todd Guice Superintendent Ouachita Parish Schools



Ponchatoula High School

19452 Highway 22 East • Ponchatoula, Louisiana 70454 Telephone: 985-386-3514 • Fax: 985-386-0011

Dr. Anna Faye Caminita PRINCIPAL Christie Atkins ASSISTANT PRINCIPAL

Lula Williams ASSISTANT PRINCIPAL

Dr. Keith Sanders ASSISTANT PRINCIPAL

Brandy Daniels ASSISTANT PRINCIPAL

Curtis White ASSISTANT PRINCIPAL

Kristi Gill ASSISTANT PRINCIPAL

August 17, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Lynette Reno, and I am a high school counselor in Tangipahoa Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I had a student this past year who was a hard worker and maintained a 3.0 GPA throughout high school. She was not a good test taker because she suffered with testing anxiety. She passed all of her LEAPs except US History and Biology. She met every other graduation requirement. She even attended the summer LEAP remediation program but still failed the exams. She is considered a high school dropout. It is unfair that this child has been denied her high school diploma due to one exam! How is this helping this child? She cannot return to high school because she finished all of her coursework. My heart still aches for her!

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely.

AUG 2 2 2023

RECEIVED

Lynette Reno Ponchatoula High School does not discriminate on the basis of race, color, nation Period fin Elementary sex, age, disabilities or veteran status. We are an equal opportunity employer.

JACKSON PARISH SCHOOL BOARD

David Claxton, Superintendent Calvin Waggoner, President

P.O. Box 705 Jonesboro, LA 71251-0707 (318) 259 - 4456 (p) (318) 259-2527 (f)

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is David Claxton, and I am the Superintendent in Jackson Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

There are a couple of points about the EXCELL Appeals Process that are worth noting. One, is that the students' course history and path should be taken into consideration. We had a student last year who met all the requirements for graduation except for passing either Biology or US History LEAP requirement. The student unsuccessfully had taken both these tests multiple times. She was on the JumpStart pathway where her gpa, WorkKeys, and credentials were all satisfactorily met. This student was unable to walk at graduation because of unsuccessfully meeting the LEAP graduation requirements. If this student would have had the opportunity to demonstrate her proficiency through a portfolio, as part of the EXCELL appeals process, she would have possibly been able to graduate with her class.

Another credible point about EXCELL is taking into consideration the student's Workforce Readiness. ACT WorkKeys National test states that if a student earns a Silver or above they show objective measures of being workforce ready. Being workforce ready is one of the focal points of why the Jump Start Pathways exist.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, David Claxton

Superintendent, Jackson Parish

Latrice Gillum 4744 Cardenas Dr New Orleans, La 70127

August 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Latrice Gillum, and I am a Parent with a child currently enrolled at a Charter School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

A diploma indicates completion of a course of study; however, a transcript can show a student's achievement through other metrics like rigor of coursework (honors, AP), GPA, and endorsements.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

A diploma earned through appeal will demonstrate an <u>objective measure of</u> evidence of employability in addition to the standard requirements of Carnegie Units (see more on this requirement below)

RECEIVED

AUG 2 4 2023

Inspire NOLA Name: Juiro Lo Pez Address: Clara 2123

Date: 02 18/23

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Juiro, and I am a (or represent) Student in orkans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

RECEIVED

AUG 2 4 2023

Inspire NOLA Name: Minderson Harlinez. Address: 9118 Nekon BL

Date: 8/18/23

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Anderson M, and I am a (or represent) Bludent in Orlenns Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,



AUG 2 4 2023

Name: 1424 Alonzo Address: N m⁶ro 1750 Date: 040570 1750 Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director

P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

Inspire NOLA

My name is 1:224 , and I am a (or represent) Studen in arkan Parish.

am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

14224 PION20



AUG 2 4 2023

Inspire NOLA Name: Kimberly Castellanos Address: 3409 Short St, New Orleans, LA 70125

Date:08-

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>Kimberly</u>, and I am a (or represent) <u>Studen +5</u> in <u>Oyleons</u> Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Rimberly Casfellands

RECEIVED

AUG 2 4 2023

Inspire NOLA Name: Briana: Ventura Address: 2637 polmyra Street

Date: 8,18,23

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Briana, and I am a (or represent) <u>Student</u> in <u>Orleans</u> Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

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AUG 2 4 70 1

Inspire NOLA Name: Haide Boutisty Address: 3708 Paugers St, New orleans 70122 Date: 08/18/22

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Maile Builstand I am a (or represent) Student in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,



AUG 2 4 2023

Inspire NOLA, Name: Hawld Gord Address: 9113 Nelson St

Date: 08/10/23

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>Horold</u>, and I am a (or represent) <u>Student</u> in <u>Orleans</u> Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

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and Sr

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AUG 2 4 2023

Board of Elementary and Secondary Education



AUG "

Bol end?

Name: Ronaldo coste forez Address: 2731, Palmyra St New Lolions LA 70119 Date: 16 15 + 18- 7033

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Roha (do (ASh and I am a (or represent) Students in arleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Bunda cus



AUG 2 4 2023

Inspire NOLA Name: Mutilde S. C. de Arcújo 2000 Address: 1462 N MIROST

Date: Aug 18 * 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Matilde, and I am a

, and I am a (or represent) (23044)

in OrlunsParish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Matide



AUG 2 4 2023

Naomi Dugar, LPC, NCC 1500 Lafayette St Gretna, LA 70053

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Naomi Dugar and I am a Licensed Professional Counselor in Jefferson Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As a former high school counselor, I have seen first hand how high school diplomas are denied to intelligent young people simply due to a singular test score on the LEAP exam.

Withholding a diploma for students who complete and pass all required coursework is a systemic failure, not a student failure.

The LEAP exam does not measure (and is not indicative of) workforce readiness. However, the EXCELL Appeals Process ensures that students are ready to contribute to the workforce and local economy.

The EXCELL Appeal Process ensures that we don't "count students out" or set them up for failure. Just like we want our students to persist, we must also persist in our endeavor to ensure student success in their post-secondary pursuits.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

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RECEIVED AUG 2 4 2023

Naomi Dugar, LPC, NCC

Kanako Asai Richard 4928 S Johnson Street New Orleans, LA 70125

8/20/23

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: <u>In Support</u> of Revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Kanako Asai, and I am a mother of 2 elementary school aged children in Orleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely Kanako Asai

AUG 2 5 2023

Marquita Imes 58072 Briar Patch Cemetary Road Loranger, LA 70446

August 17, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Marquita Imes, and I am a school counselor in Tangipahoa Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

In the past, students have not earned a high school diploma due to not passing the LEAP test. Some of these students have struggled with passing standardized test throughout the years because of test anxiety, learning disabilities, etc. We have a student that should have graduated several years ago but did not receive his diploma because of the LEAP. The inability to pass standardized tests does not necessarily mean that someone is not prepared to enter the workforce or a secondary institution. Some students have done well academically over the years and the LEAP test is the only barrier preventing them from earning their diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Marquita Imes, M.Ed., NCSC, LPC-S Professional School Counselor

AUG 2 5 2023 Board of Elementary

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Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

August 20, 2023

In Support of Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Elizabeth Ostberg and I am the founder and CEO of Educators for Quality Alternatives. Our three high schools, one middle school, and virtual and HiSET programs educate about 500 high risk young people including all the students in New Orleans who have been expelled from a traditional school.

I am writing in support of the EXCELL Appeals Process.

As alternative schools, we are constantly considering the balance of rigor and support. Our students have many things stacked against them-- for example, being teenage parents, having juvenile records, or suffering from severe trauma. Therefore it would do them no favors if they were to graduate without having mastered the same skills and content as every other Louisiana high school graduate. At the same time, when a young person faces many barriers, we know it is our responsibility to design multiple ways to learn and diverse ways to assess that learning.

As we have learned from implementing the April Dunn Act, students must work just as hard to show mastery through portfolios as to pass the LEAP. Arguably both students and teachers spend more time and attention during the individualized portfolio process to build mastery.

We believe that the EXCELL appeals process provides young people, especially young people who are learning English, an additional, and rigorous, way to show their mastery of high school material.

Thank you for your consideration and all your work on behalf of our young people.

Sincerely,

Elizabeth Ostberg, CEO Educators for Quality Alternatives 504 228 4294; eostberg@eqaschools.org

RECEIVED AUG 2 5 2023

Board of Elementary and Secondary Education www.egaschools.org

1614 Oretha Castle Haley Blvd. New Orleans, LA 70113

CLAIBORNE PARISH SCHOOL BOARD Post Office Box 600 415 East Main Homer, LA 71040-0600 Phone: (318) 927-3502 Fax: (318) 927-9184

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear BESE members,

Please accept this letter as official support for the LEAP Graduation appeal process, also known as the EXCELL Appeals process. The Superintendent's Advisory Council whole-heartedly supported this opportunity at its recent June meeting because it gave students the opportunity to still graduate if they failed to reach the passing score on the necessary High School LEAP 2025 tests, normally referred to as EOCs.

PLEASE understand that I do not support this appeal under the pretense that it will simply allow students to graduate from high school. In order to be successful in this appeal, students must demonstrate that they are proficient the standards of the coursework. They must also demonstrate that they are employable.

Only a handful of other states still have an end of course testing requirement for graduation. All of them offer an appeals process except for Louisiana.

Please consider the effects that this decision could have on the livelihood of young adults as they are preparing for graduating from high school and entering the next phase of their life.

Sincerely,

William Kennedy Superintendent

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AUG 2 5 2023

Board of Elementary and Secondary Education

Acadiana High School

LAYNE B. EDELMAN, PRINCIPAL

315 RUE DU BELIER LAFAYETTE, LA 70506-4899 lbedelman@lpsonline.com



ERIN ATKINS	ASST. PRINCIPAL
MELISSA BRUMLEY	ASST. PRINCIPAL
JARED LEBLANC	ASST. PRINCIPAL
DE'MARCUS MCQUAIN	ASST. PRINCIPAL
PHONE (337) 521-7950 FAX (337) 521-7951	ATTENDANCE (337) 521-7958 GUIDANCE (337) 521-7959

Erin Atkins 401 Presbytere Pkwy Lafayette, LA 70503

8/24/2023

Board of Elementary

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Dr. Erin Atkins, and I am an assistant principal at Acadiana High School in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As an educator, I fully believe that this appeals process will provide an opportunity for schools to provide students with barriers to success on standardized assessments an opportunity to engage in additional support in order to master the standards in LEAP courses. This appeals process will grant the students the opportunity to engage in additional work and if successful, will allow the student greater opportunity for life, an opportunity that our state simply cannot pass up.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Erin Atkins, Ed. D.

and Secondary Education



COMEAUX HIGH SCHOOL

100 W. Bluebird Drive Lafayette, LA 70508 Phone: (337) 521-7970 Fax: (337) 521-7971 https://tinyurl.com/ochsspartans

Mr. Gerald Comeaux, Principal

Mrs. Kim Magee, Assistant Principal Mr. Jacob Simon, Assistant Principa

Gerald Comeaux 100 W. Bluebird Dr Lafayette, LA 70503

8/24/2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 AUG 2.5 102

Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Gerald Comeaux, and I am the principal of Ovey Comeaux High School in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As an educator, I fully believe that this appeals process will provide an opportunity for schools to provide students with barriers to success on standardized assessments an opportunity to engage in additional support in order to master the standards in LEAP courses. This appeals process will grant the students the opportunity to engage in additional work and if successful, will allow the student greater opportunity for life, an opportunity that our state simply cannot pass up.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Gerald J. Comeaux, Ed.S.





and Secondary Education

Courtney Smith 214 Dafney Dr. Lafayette, LA 70503

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis.

My name is COULTNEY, and I am a (or represent) STUDENTS in Latayette Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I am an EL inclusion teacher at Acadiana High School and I work closely with the hispanic population. I have been learning Spanish for 7 years now, speaking for 5, and I am just getting to the point where I can respond without translating first to English, thinking about my answer, then translating back to Spanish to give my answer. I still have to look up words and I conjugate verbs wrong sometimes. I only understand about 85% of what I hear. I have first-hand experience with language acquisition, as well as the barriers and pitfalls present in the education system for language learners. In this letter, I will provide evidence of the educational disservice ELs face in Louisiana, as well as propose equitable solutions that would be more beneficial and less discriminatory towards ELs across the state.

I do agree that students who wish to go to college should show mastery in all areas of the LEAP, as it prepares them to take the ACT. If they want to go to college, the main focus should be on the ACT from day 1, not some outdated and biased set of exams that are designed to be intentionally difficult to understand, and which we are 1 of only 8 other states in the USA who use it. The other 7 states understand the bias and allow for an appeal.

However, if the purpose of the LEAP is to assess what a student knows, then it should be permitted to be administered in the students' native language, just like WorkKeys, which is owned by the ACT corporation. The reasoning here is that it has been proven to take 7 years to master a language, yet many EL students have less than 4.

Additionally, if it was about making them upstanding English-speaking citizens, then the Board of Education would cater to that, which would get them reading, writing, conversing, and listening well enough to know all the trade lingo associated with their career path and could simply provide WorkKeys to show proficiency. There would be no concern for a LEAP assessment because they will never go to college, however they will put in many years of service through blue collar, essential jobs throughout our community, and in our country. And as the years go by, they will learn more English, just like I did with my Spanish.

But that is not what this is really about.

The United States is 2nd in the world for Spanish speakers. The USA does not have an official language. The state of Louisiana does not have an official language. This is about our educational system exercising their power over a specific population: Foreigners. And if you all do not do something about the 41% of ELs who do not graduate in Louisiana annually, you cannot sit back and complain about how there are so many people who do not know English, because it will be you who have set them up to fail. And they will have succeeded.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Courtney Smith

Acadiana High School

LAYNE B. EDELMAN, PRINCIPAL

315 RUE DU BELIER LAFAYETTE, LA 70506-4899 lbedelman@lpsonline.com

ERIN ATKINS	ASST. PRINCIPAL
MELISSA BRUMLEY	ASST. PRINCIPAL
JARED LEBLANC	ASST. PRINCIPAL
DE'MARCUS MCQUAIN	ASST. PRINCIPAL
PHONE (337) 521-7950	ATTENDANCE (337) 521-7958
FAX (337) 521-7951	GUIDANCE (337) 521-7959

Jared LeBlanc 315 Rue de Belier Lafayette, LA 70506

8/24/2023

RECEIVE

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Jared LeBlanc and I am an assistant principal at Acadiana High School in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As an educator, I fully believe that this appeals process will provide an opportunity for schools to provide students with barriers to success on standardized assessments an opportunity to engage in additional support in order to master the standards in LEAP courses. This appeals process will grant the students the opportunity to engage in additional work and if successful, will allow the student areater opportunity for life, an opportunity that our state simply cannot pass up.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, uph

Jared LeBlanc, M. Ed



Reichel Morales % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Reichel .

student and I am a (or represent) 2 Parish.

Board of Elementary

and Secondary Education

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Really? Well this exam is one of the most unfair, dumbest, and most unnecessary processes that I have ever seen. I am blessed because I started learning English when I was 8 years old, and I cannot believe the amount of people that are not allowed to graduate because of this silly test. All of you are expecting an almost perfect level of English when they do not even know how to ask to go home when they need it. I think there is a huge lack of empathy here, and some of us cannot even tell how we feel about this. We are tired. This is taking away precious opportunities to graduate and grow in the United States. I would love to see this exam disappear next year. Students from the other 49 states allow different processes, so why do we deserve this? I hope that my time writing this was not wasted.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Reichel Morales

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Maryuri Morales % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Mary U(1_, and I am a (or represent)

Parish.

Board of Elementary

and Secondary Education

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think that it is very difficult for us who do not know English. My situation is difficult because sometimes we choose the wrong answers and it would be very unfair on your part to not allow the LEAP to be in the student's native language, because sometimes the answer choices are very complicated.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Maryuri Morales



Silvia Alvarado % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Silvia, and I am a (or represent) Student

Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think it is unjust that the people that do not know English are not allowed to put the LEAP test in their native tongue because sometimes we do not understand and we can choose the wrong answer and it does not give us any advantage to pass them.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Silvia Alvarado

viluid

Board of Elementary and Secondary Education



Osmin Lopez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

()SMIN, and I am a (or represent) My name is

Student Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment

I think that it is very difficult for us who do not know English. My situation is difficult because sometimes we choose the wrong answers and it would be very unfair on your part to not allow the LEAP to be in the student's native language, because sometimes the answer choices are very complicated.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

requirement for graduation and earn a high school diploma.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Osmin Lopez

Osmin Izaguine

Board of Elementary and Secondary Education



AUG 2 5 20

Board of Elementary and Secondary Education

315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Tifany Morales

% Room B 22

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

Student litanu, and I am a (or represent) My name is

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think that the LEAP exam is difficult because they put a lot of things that are difficult for me to understand on the test, and because it is my first year in the school. I think it is unfair because they should know that for us, it is hard. It is a new language and it is hard to understand. Hopefully, this year I can pass these exams.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Tifany Morales

Tifany Morules



AND DO THE

Board of Elementary and Secondary Education

Katerin Ramirez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is

Katerin, and I am a (or represent) Student in Latayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Unfortunately, all of us latinos are not afforded the help of being able to take the LEAP in Spanish, which is our first language. The people who speak English, from my point of view, I believe it is unjust that they can take the test in a language they already know, whereas us latinos are not able to do it in Spanish. I entered this school approximately 3 years ago and I still do not have the capacity to speak perfectly in English. For me, it is very difficult to be able to speak perfect English, but I am trying to learn it for my future. I understand the concept of how to do it, but I do not know what to put since I do not understand - I speak Spanish. I feel nervous that I will not be able to pass the exams because what I want is to graduate, and I would feel a little better about my graduation if I could take the LEAP exams in my first language.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Katerin Ramirez

Kateria Ramizez



Dani Tejada % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Dani, and I am a (or represent) student in Lafayette Par

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

To take the LEAP in a language that I want to learn is very difficult for me. It affects me very much because I am motivated in each class and to know that I am going to take an exam in English affects whether or not I will continue to be motivated in my classes. I do not believe I will be able to pass the LEAP test because I am still learning the language. I would like there to be a way to be able to do different work to be able to graduate. What I want to say is they should give opportunities to be able to graduate without taking the LEAP exam.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Dani Tejada

an

Board of Elementary and Secondary Education

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RECEIVED

Board of Elementary and Secondary Education

Jimy Gutierrez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is JIMU

student and I am a (or represent) Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP in itself is not too difficult, because when one knows a little English they are understood a little, although if we were able to put it in Spanish, it would be much easier to take the LEAP. We also can not repeat the exam until the next year.

Based on my experience, the exams are difficult because I do not know English. The LEAP tests are unjust because they do not help us when we are missing one point to pass. I flunked an exam just for one point. In closing, these exams are unnecessary and unfair.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Jimy Gutierrez

Intierra



Kelly Ayala % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Kelly , and I am a (or represent) <u>Student</u> in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP gives me anxiety, because to take an exam that is not in my language I think that I could fail it and I do not like to fail and that makes me sad. The fact is that taking a test in English and sometimes not knowing what I should do stresses me out. I can barely understand it and write it sometimes, I do not read much and speak it a little. By taking the LEAP tests or only knowing that I will take it makes me nervous in my studies because I should concentrate more on raising my grades and concentrate more on my English, not to be able to take the LEAP. I do not know anyone that has taken the LEAP or that has abandoned their studies for the exam. The LEAP does not represent everything that I know because I know many more things. I think Louisiana being one of the only states that does not allow an appeal on the LEAP to be able to graduate is unjust because there are people who do not speak the language with fluidity, neither can they write it, and sometimes they cannot read it. I believe they should make other types of tests so we can graduate.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Kelly Ayala

Board of Elementary and Secondary Education



Breyssi Garcia % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Breyssi, and I am a (or represent) student in Lafory

Parish.

Board of Elementary and Secondary Education

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The LEAP is not a smart way to test students' intelligence. I am an intelligent person, I know. When I got to the United States, that did not change. Everything was going well, until I heard about the LEAP tests. An exam where I could not translate. A formula in mathematics is not the same as a language. I can not learn a language in 1 or 2 days, I was confused and nervous. I saw the other native English-speaking students responding and reading with ease. I felt stupid. I only had a dictionary, and I could not even use it on the ELA exam. I had to search word for word. I was very slow, including the exams that have start times and end times, I had a lot of questions, "and if I do not finish on time?" My second year in the United States was very good. I even won an award!! But on the LEAP tests I felt nervous again. During the whole year, I translated many things to help me. On the LEAP I could not translate anything and once again I had a great dictionary that I was not permitted to use on many parts of the test. I did not have permission to use help from a translator. I am intelligent, but these exams make me feel stupid. I am sure that many students feel the same way, these exams are ridiculous.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Breyssi Garcia



Board of Elementary and Secondary Education

Ever Valladares % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Ever, and I am a (or represent) Student in Lafayet

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

My feelings about the LEAP tests are that they are totally degrading. When I take the LEAP exam I feel quite nervous because it is a language that I am still learning. It complicates things a lot for me because it is difficult for me to understand. The LEAP affects me in my classes, knowing that if I fail to pass the exam I stay and repeat the year or I could not graduate. The LEAP, yes it is a good representation of what we have learned in the year but to not know English is a big complication. I feel very deceived to know that if we do not pass the LEAP we can not graduate, is something very upsetting to know about.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Ever Valladares Ever Valladares



Maxwell Peralta % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis.

My name is

Maxwell, and I am a (or represent) Student in Latayette Parish.

Board of Elementary. and Secondary Education

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I feel confused when taking the LEAP because sometimes I get confused with the words or the meaning. It is difficult for me because I am taking a test in a language that I had never practiced or studied. It affects my desire to continue studying because if the test is in English and I do not pass the exam and the following year the test continues to be in English and I still do not know English. I am going to repeat the year. I will fall behind in my studies and I will get to a point where I will get tired of doing it. I will no longer continue. I will leave school and go to work.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Maxwell Peralta



Cristel Medina % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>Cristel</u>, and I am a (or represent)

Student Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think that it is very unfair to the students who are putting the effort in to study and complete all their assignments. It seems to me that is not right that the majority of the ELs could be those who do not pass the test, and they could be those who do not have the opportunity to graduate after all of the effort that each student put into each of their classes. Personally, I stay awake doing my homework and I sleep maybe 4 or 5 hours. Being able to bring a good grade to my house and to my mother is something I think would make them proud of me.

And it does not seem fair that after 4 or 5 years of effort, all of our time has been a waste of time and we cannot be someone respectable or seen before society. In addition to that, also the fear and all the pressure felt that comes with taking the LEAP tests.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Cristel Medina

Danmar Milam 630L Ira St Carencro LA 70520

August 25, 2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: <u>In Support</u> of Revisions to Bulletin 741, *Louisiana Handbook for School Administrators* : §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Danmar Milam, and I am a teacher in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

- It is a Louisiana-imposed requirement not federal that students must "pass a test" to be eligible for graduation. 42 states do not have this requirement;
- Students who appeal will leave high school with the skills needed to immediately enter the economy or pursue post-secondary technical training. Currently, students who don't "pass" the LEAP are drop-outs.
- The LEAP exam does not measure (and is not indicative of) workforce readiness.
- The LEAP exam has been the barrier to graduation for English Learners

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Danmar Milam

Heidi Dressler 417 Chateau Place, Lafayette, LA 70503

24 August 2023

RECEIVED

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Heidi Dressler, and I am an academic behavior coordinator in Lafayette Parish. This job affords me the opportunity to work closely with 504 students, as well as other students that need additional behavioral and academic support.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals process will benefit students with learning disabilities who do not qualify for an IEP, acute health conditions that result in loss of learning time, testing anxiety, and parenting students. Students who struggle with the mechanics of test taking will be able to demonstrate their mastery of academic standards to an alternate, but equally rigorous, method. Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in Louisiana. It is estimated that less than 5% of students will try to graduate through an appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units and meet the intensive requirements of the appeal process, which includes elements that exhibit overall student achievement and capabilities, compared to a single exam that includes subjective elements, such as constantly changing required passing percentages.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Dressen Heidi Dressler

Cy M. Dugas, LPSS Pre Educator Pathway Coordinator Lafayette Parish School System 202 Rue Iberville Lafayette, LA 70508-1502

August 24, 2023

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: <u>In Support</u> of Revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Cy Duga and I am a parent AND educator in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

My position in LPSS is to recruit students from middle and high schools to consider pursuing a degree in education and returning to serve tomorrow's students. We need teachers. We need teachers from a variety of backgrounds and with a variety of experiences to meet the needs of students with those same backgrounds and experiences. As a parent of four students who have benefited and excelled in our incredible public schools in Lafayette Parish I want my grandchildren and the next generation of students to have the same OUTSTANDING opportunities that my children and I had. Many students who are not "traditional scholars" and may have some issues with standardized tests but are HARD WORKERS have the background experiences and cultural competence to become great teachers. It is so unfair that many of these students NEVER get the opportunity to even try due to a single standardized test. Imagine a world where all students get a chance to experience a post-secondary education and eventually are able to give back to our community.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

2 Cy Dagis Cy Dugas,

Acadiana High School

LAYNE B. EDELMAN, PRINCIPAL

315 RUE DU BELIER LAFAYETTE, LA 70506-4899 lbedelman@lpsonline.com CONTRACTOR OF THE SECOND

ERIN ATKINS	ASST. PRINCIPAL
MELISSA BRUMLEY	ASST. PRINCIPAL
JARED LEBLANC	ASST. PRINCIPAL
DE'MARCUS MCQUAIN	ASST. PRINCIPAL
PHONE (337) 521-7950	ATTENDANCE (337) 521-7958
FAX (337) 521-7951	GUIDANCE (337) 521-7959

Melissa Brumley 315 Rue de Belier Lafayette, LA 70506

8/24/2023

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Melissa Brumley and I am an assistant principal at Acadiana High School in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As an educator, I fully believe that this appeals process will provide an opportunity for schools to provide students with barriers to success on standardized assessments an opportunity to engage in additional support in order to master the standards in LEAP courses. This appeals process will grant the students the opportunity to engage in additional work and if successful, will allow the student greater opportunity for life, an opportunity that our state simply cannot pass up.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Melissa Brumley, M. Ed

Dante Hebert 9402 Garrett Rd, Maurice, LA 70555

24 August 2023



Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Dante Hebert, and I am an instructional leader in Lafayette Parish. Prior to this role, I worked in the classroom as a social studies teacher for seven years, and spent one year and several summers teaching a Jumpstart elective class that helped students to earn the micro enterprise and customer service credentials.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Opponents of this revision state that they believe doing so will weaken the distinction of a high school diploma in Louisiana. After teaching a course where students worked to earn regional and state level credentials, as well as observing the credentialing process in other courses in my current role, I can confidently attest that earning these credentials are in no way simple, and certainly indicate workplace readiness. The LEAP exam does not measure (and is not indicative of) workforce readiness or language proficiency. However, the appeals process ensures that students are ready to contribute to the workforce and local economy. It is a Louisiana-imposed requirement - not federal - that students must "pass a test" to be eligible for graduation. 42 states do not have this requirement.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in Louisiana. It is estimated that less than 5% of students will try to graduate through an appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units and meet the intensive requirements of the appeal process, which includes elements that exhibit overall student achievement and capabilities, compared to a single exam that includes subjective elements, such as constantly changing required passing percentages.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

- Al-

Dante Hebert

Acadiana High School

LAYNE B. EDELMAN, PRINCIPAL

315 RUE DU BELIER LAFAYETTE, LA 70506-4899 lbedelman@lpsonline.com

ERIN ATKINS	ASST. PRINCIPAL
MELISSA BRUMLEY	ASST. PRINCIPAL
JARED LEBLANC	ASST. PRINCIPAL
DE'MARCUS MCQUAIN	ASST. PRINCIPAL
PHONE (337) 521-7950	ATTENDANCE (337) 521-7958
FAX (337) 521-7951	GUIDANCE (337) 521-7959

De'Marcus McQuain 315 Rue de Belier Lafayette, LA 70506

8/24/2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is De'Marcus McQuain and I am an assistant principal at Acadiana High School in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

As an educator, I fully believe that this appeals process will provide an opportunity for schools to provide students with barriers to success on standardized assessments an opportunity to engage in additional support in order to master the standards in LEAP courses. This appeals process will grant the students the opportunity to engage in additional work and if successful, will allow the student greater opportunity for life, an opportunity that our state simply cannot pass up.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely.

De'Marcus McQuain, M. Ed

RECEIVE

Board of Elementary and Secondary Education Cynthia Gonzalez 101 Rue Mamou Duson, LA 70529

Aug 24, 2023

AUG 2.5 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Cynthia Gonzalez, and I am a (or represent) Para-Educator in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I work first hand with our Spanish speaking students at Acadiana High School. I see how hard they work in class despite the language barrier. Just like my parents did, they are here for a better education, for better opportunities and we should not take that away from them. Our students are overcoming challenges everyday while being criticized for not being as proficient as their native English speaking classmates. Many become discouraged to continue their education just because they are points away from passing the LEAP. Our EL students work twice as hard to translate from english to spanish and back to english. When my students and I work together in class they shine and completely understand what we are working on but when it comes to the formal testing they get confused because it's in a language they haven't mastered yet. They talk to me about their plans and future but there is always this dark cloud around it because they have the doubt, unsure if they will even make it to graduation because of one single point they missed on the LEAP. The United States was built on dreams and opportunities and no child, despite the language, should be denied that opportunity.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Cynthia Gonzalez





Heidi Martinez Vasquez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>Heydi</u>, and I am a (or represent)

student Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

According to my point of view, I believe the LEAP exam is unjust; the reason being that it is in a language that is not my first language, and because of this I literally do not know what I am doing and am unable to understand any of the questions on the LEAP. After everything, I did not pass the English LEAP test because I was not at the capacity to do more than a paragraph. I only put what I know how to say in English and that did not serve me well. I have not had much time here in the United States and I do not know how to understand it as it is written. Above everything else, the United States does not have an official language. It would seem much better to take the LEAP test in Spanish. It would be more beneficial to us so that we could understand it better, and we would not be as nervous when we have to take it. We would try to pass the exams to be able to graduate and to be very successful in our future lives. What we ELs are doing is a super effort to be able to have good grades in our classes.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely. Heidi Martinez Vasquez



Alla 2 a viga

Board of Elementary and Secondary Education

Elvin Gomez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Elvin Gomez and I am a (or represent) Stadent in Jakapette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I am a student at Acadiana High and I do not agree with the fact that, to graduate, I have to pass the LEAP exams, since the language is not the same as the one I already know. Additionally, I do not know English very well and even if I know the answer, sometimes I do not know how it is written. I also feel nervous taking these exams because I still do not believe that I can pass.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Elvin Gomez

EIVIN GOMAZ





Keneth Romero % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Keneth, and I am a (or represent) Student in Lafayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

My feelings about the LEAP are those of displeasure. Because when I take this exam, I feel really nervous and stupid with it being in a language that I am still learning and do not have mastered at all. It is extremely complicated for me because I do not even understand half of the things I read and hear on these exams. And it is disappointing to see the final grade and how it affects my self esteem and my grades. I do not feel like this can determine what I know because I do not understand, and I want another way to demonstrate what I know.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Keneth Romero

Cudadad



Jeniffer Medina Valle % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>Jeniffer</u>, and I am a (or represent) <u>Student</u> in <u>lafayette</u> Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think the LEAP exams are very unfair both to us as hispanics and for all of the ELs living in Louisiana because this is a state that does not even have an official language.

It is really unfair that all the school subjects should be tested in English, when we can barely understand the language, and when there are many other ways to be able to graduate in the 12th grade. Let us suppose that only 41% of ELs graduate, thanks to the LEAP, but what about the other 59% of the kids that should also have the opportunity to graduate.

I feel so nervous and frustrated about this despite the fact that I do not know how to speak English, knowing that English is not my primary language. I have recently arrived from my home country, and in spite of that I feel that I have made some progress. But it is not enough to be able to take the 4 LEAP tests. This is very unfair for us as well as everyone else.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Jeniffer Medina Valle

Jeniffer Medina Valle.



Jesther Alvarez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis.

My name is Jestber, and I am a (or represent) Student in Latayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I am a student at Acadiana High. Just another student who does not believe that it is fair to have to pass the LEAP to be able to graduate. What I do believe would be fair is if they would allow us to demonstrate our knowledge and what we have learned in another way that would be easier for us . The LEAP is not in our language and it is not fair to have to take such a difficult exam in another language. I think that each EL student that takes the LEAP test is stressed out due to the fear of failing it or failing the grade, so we demand a LEAP test in Spanish.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Jesther Alvarez

Jeither Aludrez



Marilin Guzman % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Marilin Guman and I am a (or represent) Student

dent in Calayette Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

My feelings about the LEAP exams are that it makes me feel nervous and I can barely use my voice, as it comes out trembling and I have worked extremely hard but cannot respond. When a person is talking to me, I want to respond but I cannot, because they are looking at me and I get nervous. During the exams I get nervous when I am going to write or speak because I can barely write, and when speaking I cannot do it; I cannot pronounce the answer, and saying it makes my voice tremble. Plainly speaking, I need more time in my head to think. I have faith that I will be able to increase my scores in the exams this year, if I can just be able to perform.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Marilin Guzman

Board of Elementary and Secondary Education





Cesar Alvarez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is <u>CESAN</u>, and I am a (or represent) <u>Student</u> in <u>Lafayett</u> Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I do not feel confident taking the LEAP test to demonstrate my knowledge so that I can graduate. I believe this is very unfair for the students that try to learn a new language. I think that one of the ideas to be able to demonstrate our knowledge could be a portfolio where all of your work is shown. My biggest concern is to be a senior and to have passed all my classes and not be able to graduate just because of a LEAP test that you cannot pass, seems really ridiculous to me.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Cesar Alvarez

Cesar Alugrez.



Iris Gomez % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Inis G, and I am a (or represent) Student in Lafayett Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think it is unfair that we should have to pass the LEAP to be able to graduate. I believe there should be other ways for us to graduate, because how do they think that someone is going to be able to pass a LEAP test in a language that they can barely understand? And maybe we would be able to pass it if it was in our own language, which in my case is Spanish. I feel very nervous when they tell me that I will not be able to graduate if I do not pass a LEAP, and that makes me really nervous and makes me feel scared too because it is going to be really hard to be able to do something in another language that I do not know.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Iris Gomez

IVIS Gómez



Anyelin Julian % Room B 22 315 Rue du Belier Lafayette, LA 70506

August 22, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Anyelin J_, and I am a (or represent) Student in Julayette. Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Having to take these LEAP tests looks like something extremely unfair to me because there are many latinos here that come to the country in the 12th grade and are struggling to learn the language. I also feel that is unfair because knowing how to learn another language is not an easy thing to learn. I would like for us to be able to have other ways of testing us because we do not know about everything in this country like the people who are born here do. It does not seem to me like taking such a long test would be very important for graduation. We should have other ways to test, or we could even be allowed to take the exam in Spanish. Because even though I do not fully understand English, I only have one more year to learn more and it depends on exams where perhaps I only missed it by one point, and then I will not be able to graduate. This is an injustice done to us and is very stressful and frustrating. I also feel bad because maybe I already know what the exam says, but because of the level of my English, I cannot put the words that I want to put.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Hayelin Julian.

Sincerely,

Anyelin Julian

COMMITTEE OF 100 FOR ECONOMIC DEVELOPMENT, INC.



EST. 1992

August 24, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

RECEIVED

Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis:

On behalf of the Committee of 100 for Economic Development, Inc., I am writing in support of the EXCELL <u>Appeals</u> Process, which provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

Thank you for your time and service to the children, teachers, and families of Louisiana.

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Michael Olivier Chief Executive Officer

Stacy Martin President, Collegiate Academies 2625 Thalia Street New Orleans, LA 70113 8/24/23

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis, Board President Boffy, Members, Superintendent Brumley,

I serve as the President of Collegiate Academies, a network of five high-performing high schools in Baton Rouge and New Orleans, as well as two innovative post-secondary programs. I am writing in support of the changes to Bulletin 741.

Before I explain why, I would like to take a brief moment to commend a Collegiate Academies educator whose tireless efforts did so much to shine a light and elevate the issues we are talking about today.

Emma Merrill is a founding teammate and leader at Las Sierras Academy, our program for Newcomers to the country who are learning English. We at Collegiate have a refrain:

What our kids do is a reflection of what we expect, demand, and know to be true.

Emma and the Las Sierras team <u>expect</u> excellence, <u>demand</u> hard work, and <u>know</u> that their 50+ ELs are capable of great academic achievements. Last year, the EL students at Collegiate scored in the Top 5 of all high schools statewide in terms of Mastery on Algebra and English I — the focus of the Las Sierras newcomer program.

We are chasing results week after week, year after year. Ms. Merrill's leadership has been incredible, both in the classroom and in this boardroom. Thank you.

Even as educators like Ms. Merrill are hustling to support students with success on LEAP exams, we know that some students will struggle to show their full grasp of the material on a test. For our English Learners, the format is new to them and the LEAP measures English comprehension at least as much as content mastery. For students with dyslexia, test anxiety, or any number of other issues, they do not always do their best work on the specific format we as a state have prescribed for LEAP.

This policy creates a much-needed avenue for more young people to show what they know and stay on-track for graduation. Who will benefit most? Young people who need to be able to envision themselves as successful graduates, employees, and citizens.

The playbook laid out in EXCELL is difficult, even burdensome — both for the students themselves and for the educators around them. If implemented well, a small percentage of each cohort will benefit from the opportunity, while the vast majority of students will graduate without needing to access an appeal. And if our 15+ years of experience in running high schools holds true, the large majority of those students that access an appeal will pass multiple LEAP tests. The additional EXCELL requirements provide an alternative "last-mile" for the remaining pair of LEAP tests, an alternative that will take determination, persistence, and hard work — all qualities that we want our young people to leave high school demonstrating.

Finally, we believe the approved Bulletin 741 revisions provide safeguards against misuse of the appeals process, both through transparent reporting and a backstop that sits with the State Superintendent of Education. Rigorous portfolio standards and strong administrative support by the Department can make this appeal process a success for our state.

Thank you for the opportunity to provide comments and for your service to our state. These are difficult questions and your engagement to find the right way forward for Louisiana is encouraging.

Stacy Martin President

Keysian Thompson

Aug 21, 2023

RECEIVED Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Keysian and I am a student in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

There are many ways that the EXCELL program can help students such as the the ones who do not speak fluent english the leap test basically positions people who do not speak fluent english them to fail and they don't even show any form of sympathetic emotions towards them either i believe that this is very wrong and selfish and by the most cruel thing that happens to people who do not know english how could fail someone that are trying their hardest to speak your language. Another reason that we should have the EXCELL program is because it can actually help people in need instead just leaving stuck and conflicted on how they are going to make it in life which is why i support EXCELL program because they pledge to help those that are in need and not just leave in the dust like their some piece of trash with EXCELL that would not happen because they will focus on your needs and your potential to be successful in life.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Keysian Thompson

Jordan Tucker 2025 Living School 6003 Bullard New Orleans, Louisiana

RECEIVED Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Jordan Tucker, and I am a (or represent) Student in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals process will benefit students with learning disabilities who do not qualify for an IEP, acute health conditions that result in loss of learning time, testing anxiety, and parenting students. Students who struggle with the mechanics of test taking will be able to demonstrate their mastery of academic standards to an alternate, but equally rigorous, method.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Jordan Tucker

pre-



Shantell Alfred 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

RECEIVED

Board of Elementary and Secondary Education

Dear Ms. Davis,

My name is Shantell Alfred, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Students must still demonstrate content proficiency by completing a portfolio in both areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

A diploma earned through appeal will demonstrate an objective measure of evidence of employability in addition to the standard requirements of Carnegie Units (see more on this requirement below)

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are objective measures of workforce readiness.

Students who appeal will leave high school with the skills needed to immediately enter the economy or pursue post-secondary technical training. Currently, students who don't "pass" the LEAP are drop-outs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, Shantell Alfred



April Moreland 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is April Moreland, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, Moreland



Sidney Evans 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Sidney Evans, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

Students must still demonstrate content proficiency by completing a portfolio in both areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are objective measures of workforce readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sidney Evans Stating 5. Train

RECEIVED Board of Elementary and Secondary Education



Marielle Pichon 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Marielle Pichon, and I am a (or represent) Living School in Orleans Parish.

I am writing <u>in support of the EXCELL Appeals Process</u>. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement.

A diploma indicates completion of a course of study, however, a transcript can show a student's achievement through other metrics like rigor of coursework (honors, AP), GPA, and endorsements.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely

Marielle Pichon



James Lutrell 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

RECEIVED Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is James Lutrell, and I am a (or represent) Living School in Orleans Parish.

am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

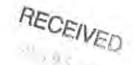
I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

1 bet James Lutrell



Ashona Winzy 6003 Bullard Avenue, New Orleans LA 70128



Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis.

My name is Ashona Winzy, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement.

Students must still demonstrate content proficiency by completing a portfolio in both areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

A diploma earned through appeal will demonstrate an objective measure of evidence of employability in addition to the standard requirements of Carnegie Units (see more on this requirement below)

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are objective measures of workforce readiness.

Students who appeal will leave high school with the skills needed to immediately enter the economy or pursue post-secondary technical training. Currently, students who don't "pass" the LEAP are drop-outs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana

Sincerely,

Ashona Winzy

Ashona VIII2, Aplina Mizy



Eduardo González 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Board of Elementary and Secondary Education

RECEIVED

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Eduardo González, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

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I ask that you please support the EXCELL Appeals Process

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, Eduardo Gonzáloz



Louis Lampcov 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Louis Lampcov, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Louis Lampcov

Board of Elementary and Secondary Education

RECEIVED



Ann Holleman 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Ann Holleman, and I am a (or represent) Living School in Orleans Parish.

I am writing <u>in support of the EXCELL Appeals Process</u>. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

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I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely

Ann Holteman





Tanike Simmons 6003 Bullard Avenue, New Orleans LA 70128 Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Tanike Simmons, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

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I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Tanike Simmons



Whitney Dickerson 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Whitney Dickerson, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Whitney Dickerson



Pamela Recasner 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Board of Elementary and Secondary Education

RECEIVED

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Pamela Recasner, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely Pamela Recasner



Rahn Broady 6003 Bullard Avenue, New Orleans LA 70128

RECEIVER

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely

Rahn Broady



Jahmal Hurst 6003 Bullard Avenue, New Orleans LA 70128



Board of Elemeniary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Jahmal Hurst, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Jahmal Hurst



Kaylin Toca 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Board of Elementary, and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Kaylin Toca, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Kaylin Voca Kaylin Toca



Katelyn Wills 6003 Bullard Avenue, New Orleans LA 70128

and Secondary Education

RECEIVED

Board of Elementary

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Katelyn Wills, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Katelyn Wills



Donald Thomas 6003 Bullard Avenue, New Orleans LA 70128 RECEIVED

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Donald Thomas, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

ald Konne Donald Thomas



Rosland Brown 6003 Bullard Avenue, New Orleans LA 70128 RECEIVED

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Rosland Brown, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely Rosland Brown



Hereatha Allen 6003 Bullard Avenue, New Orleans LA 70128

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Hereatha Allen, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Hereatha Allen



Ronald P. George Jr. 6003 Bullard Avenue, New Orleans LA 70128 Board of Elementary and Secondary Education,

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Ronald P. George Jr., and I am a (or represent) Living School in Orleans Parish.

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, 150

Ronald P. George Jr.



Alexandria Holmes 6003 Bullard Avenue, New Orleans LA 70128

RECEIVED

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Alexandria Holmes , and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Alexandria Hølmes



6003 Bullard Avenue, New Orleans LA 70128

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RECEIVED

Board of Elementary and Sacondary Education

Aug 21, 2023

Rvan Fuller

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Ryan Fuller, and I am a (or represent) Living School in Orleans Parish.

I am writing <u>in support of the EXCELL Appeals Process</u>. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Ryan Fuller



RECEIVED

Avis Smothers 6003 Bullard Avenue, New Orleans LA 70128

Board of Elementany and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Avis Smothers, and I am a (or represent) Living School in Orleans Parish.

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely. (methors



Board or Elementary and Secondary Education

Teniya Holliday 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Teniya Holliday, and I am a (or represent) Living School in Orleans Parish.

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Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Teniya Holliday



Board of Elementary and Secondary Education



Anya Barnes 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis.

My name is Anya Barnes, and I am a (or represent) Living School in Orleans Parish,

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Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Enera Barnes





Board of Elementary and Secondary Education

Denise Ellis 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Denise Ellis, and I am a (or represent) Living School in Orleans Parish.

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Sincerely,

Denise Ellis



Layla Clark 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Layla Clark, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely, Layla Clark

RECEIVED

Board of Elementary and Secondary Education





Board of Elementary and Secondary Education

Naimika DeJean 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Naimika DeJean, and I am a (or represent) Living School in Orleans Parish.

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I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely Naimika DeJea



Charles Medley 6003 Bullard Avenue, New Orleans LA 70128 RECEIVED

Board of Elementary and Secondary Education

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Charles Medley, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Only 8 states, including Louisiana, require standardized test performance for graduation, but even the 7 other states have expanded criteria or an appeals process of this requirement.

A diploma indicates completion of a course of study; however, a transcript can show a student's achievement through other metrics like rigor of coursework (honors, AP), GPA, and endorsements.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

1. 6

Charles Medley



Nicholas Moore 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Nicholas Moore, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

Students must still demonstrate content proficiency by completing a portfolio in <u>both</u> areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

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Nicholas Moore

RECEIVED

Board of Elementary and Secondary Education



Eric Schroeder 6003 Bullard Avenue, New Orleans LA 70128

Aug 21, 2023

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Eric Schroeder, and I am a (or represent) Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals process will benefit students with learning disabilities who do not qualify for an IEP, acute health conditions that result in loss of learning time, testing anxiety, and parenting students. Students who struggle with the mechanics of test taking will be able to demonstrate their mastery of academic standards to an alternate, but equally rigorous, method.

A diploma earned through appeal will demonstrate an <u>objective measure of</u> evidence of employability in addition to the standard requirements of Carnegie Units (see more on this requirement below)

The LEAP exam has been the barrier to graduation for English Learners. ELs in Louisiana have the lowest graduation rate nationwide (pre-Covid - 41%). A disproportionate increase in the grad rate of ELs following the Covid waivers of 2020 & 2021 revealed the disparate impact of the LEAP exam on ELs.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely

Eric Schroeder

Brianna Smith 6003 Bullard

8/24/23



Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Brianna Smith and I am a student at Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process allows students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I have been taking the leap test since I was in the 4th grade which is 9 years and that has been the only way I could graduate to the next grade level I could pass all my classes and my leap score would decide if I could graduate to the next grade level. So I think we should get rid of the leap not only for me but also for my peers that don't speak English and the leap only comes in English so I think Louisana as a state should get rid of the leap test.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. Please support the EXCELL Appeals Process.

Thank you for your time and service to Louisiana's children, teachers, and families.

Sincerely,

Brianna Smith

Aiden Houston 6003 Bullard New Orleans, Lousiana

August 24, 2023

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064 RECEIVED

Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCEL Appeals Process)

Dear Ms. Davis,

My name is Aiden Houston and I am representing Rigor of the Diploma in St.Bernard Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

The EXCELL Appeals Process does not weaken the distinction of a high school diploma in LA. It is estimated that less than 5% of students will try to graduate through appeal, and there is no guarantee of appeal success. Students must still earn all required Carnegie Units. A diploma indicates completion of a course of study; however, a transcript can show a student's achievement through other metrics like rigor of coursework (honors, AP), GPA, and endorsements.

Students must still demonstrate content proficiency by completing a portfolio in both areas of an assessment pair. This is a more rigorous expectation than having to only "pass" one exam in the pair. LEAP scores still factor at least 15% in a student's course grade, requiring classroom success.A diploma earned through appeal will demonstrate an objective measure of evidence of employability in addition to the standard requirements of Carnegie Units

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana

Sincerely,

Aiden Houston

Santiago orduno 14412 dwyer blvd

08-21-2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Santiago Orduno, and I am a student in LA in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the EXCELL Appeals Process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

The EXCELL Appeals process will benefit students with learning disabilities who do not qualify for an IEP, acute health conditions that result in loss of learning time, testing anxiety, and parenting students. Students who struggle with the mechanics of test taking will be able to demonstrate their mastery of academic standards to an alternate, but equally rigorous, method.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.a

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Suttingo ordund

Santiago

RECEIVED

Raheim Hughes 6003 Bullard Living school

8/22/23

Board of Elementary and Secondary Education.

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Raheim Hughes, and I am a Student of Living School in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I think the leap test is racist because out of 50 states Louisiana is one of the 8 states that have to take leap. I believe the leap was made to stop people from graduating just because they couldn't meet the requirements for the leap and leap also stop my peers that don't speak english this could affect them while taking the test that only come in english. So therefore I think louisana should get rid of the leap test.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Raheim Hughes

Roheim #

Crisley Espinoza LSNO 6003 Bullard

08-21-2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Crisley Espinoza, and I am a student i_Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

I ask that you please support the EXCELL Appeals Process for all the students who do not know English they should not make us take the exam because how are we going to do the exam if we come to the United States the other option that they would see us of giving outside that they give us in Spanish

and so we can pass the exam and that we can pass the grade.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Crisley Espinoza

Mrislay E.

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ATSULA

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Board of Elementary and Secondary Education

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321, Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Yasmin Alvarado, and I am a student at the Living School.

I am writing <u>in support of the EXCELL Appeals Process</u>. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana.

Sincerely,

Yasmin Alvarado

Yasmin Alwareda -

Cayden L Houston

Living School 6003 Bullard Avenue New Orleans LA

August 21, 2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: In Support of Revisions to Bulletin 741, Louisiana Handbook for School Administrators: §2321. Appeals and Eligibility Requirements (EXCEL Appeals Process)

Dear Ms. Davis,

My name is Cayden L Houston, and I am a student in Orleans Parish.

I am writing in support of the EXCELL Appeals Process.

The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Increasing the avenues to a HS diploma increases the positive outcomes possible for young people. Without the opportunities provided by a HS diploma, people are more likely to turn to crime. I have heard that dropouts get arrested at 4x the rate of graduates. In my experience, this is true.

I would appreciate your careful consideration of the EXCELL Appeals Process as an equitable solution to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes. I ask that you please support the EXCELL Appeals Process.

Thank you for your time and service to the children, teachers, and families of Louisiana

Sincerely,

Cayden L Houston

(if applicable, organization letterhead) Tatianna Lewis 6003 Bullard Ave. New Orlans, LA, 70128 08/21/2023

RECEIVED

Board of Elementary and Secondary Education

Louisiana Board of Elementary and Secondary Education Attn: Ms. Shan Davis, Executive Director P. O. Box 94064, Capitol Station Baton Rouge, LA 70804-9064

Re: <u>In Support</u> of Revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §2321. Appeals and Eligibility Requirements (EXCELL Appeals Process)

Dear Ms. Davis,

My name is Tatianna Lewis, and I am a student in Orleans Parish.

I am writing <u>in support of the EXCELL Appeals Process</u>. The EXCELL Appeals Process provides an opportunity for students to appeal the LEAP assessment requirement for graduation and earn a high school diploma.

Students who don't speak English face a lack of education equity. The default language when teaching is English, so this serves as a setback for the Spanish speakers. These students aren't fluent in English, which makes it impossible for them to complete assignments, take tests, or communicate with their peers/teachers. Also students with learning disabilities find it more difficult to take tests, so they would require more time than other students.

Students with learning disabilities or aren't fluent in English face hardships in workforce readiness. They aren't taught at the pace they require and the help they receive isn't enough to help them pass major tests, like LEAP. LEAP doesn't test a student's ability to manage in work spaces, so these students aren't prepared for life after high school and they risk failing. Students aren't prepared for the LEAP because they aren't receiving enough help. This causes a negative shift in the possibility of the student scoring a good grade and their likelihood of "passing" or graduating.

Students who cannot pass LEAP have a high chance of not graduating. Spanish speakers that enter high school that can't speak English have to sit through tests that aren't just hard but are in English. It takes seven years to become fluent in a language. It cannot be expected for these students to become fluent in English quickly and it is unfair to them.

OPPOSE



650 Poydras St., Ste. 2825 New Orleons LA 70130 1504) 569-0607 Www.bend.org

August 9, 2023

Ms. Shan Davis Executive Director, Louisiana State Board of Elementary and Secondary Education Suite 5-190 1201 North Third Street Baton Rouge, LA 70802

To whom it may concern:

On behalf of The Business Council of New Orleans and the River Region (Business Council), I write in opposition to the proposed changes to Bulletin 741 Sections 717, 2321 and 2322 and, as an organization with a membership of more than 70 CEOs of significant regional businesses, to formally request a public hearing on the rule change pursuant to La. R.S. 49:961(B)(1).

The Business Council has worked for decades to ensure our public schools deliver on their promise of a quality public education that prepares our students to reach their potential. This proposed rule change, which opens the door for tolerance of a school's failure to perform, contradicts our effort and underserves our students.

We are particularly concerned that the policy change could diminish the respect in the job market of a Louisiana high school diploma, erode the quality of high school education, and undermine performance measures associated with our state's high school accountability system. These concerns intersect with workforce development, employee recruitment and retention and the ability to effectively deliver a fundamental public service.

We understand the proposed changes originated with a concern for English language learners and the need to identify a solution for their complex testing and graduation scenarios. The Board's April 19, 2023 directive to the Louisiana Department of Education for the development of a specifically responsive solution is a better path forward than the overreach and risk of an appeals process applicable to all students. *See* April 19, 2023 BESE Minutes, Motion 7.1.22.

For these reasons, we ask that you reconsider the policy revisions and reset the focus and public dialogue on addressing the needs of Louisiana's English language learners rather than creating generalized allowances for a school's failure to perform.

Sincerely,

Paul Flower

RECEIVED

AUG 1 4 2023

Chair, Business Council of New Orleans and the River Region

Board of Elementary and Secondary Education

ATTACHMENT #8

BESE Summary of Public Comments and Agency Response

STATE BOARD of ELEMENTARY and SECONDARY EDUCATION



Summary of Public Comments and Agency Response Bulletin 741 – *The Louisiana Handbook for School Administrators:* §717. Reports of High School Credit; §2321. Appeals and Eligibility Requirements; and §2322. Senior Projects An appeals process for certain students who do not meet current graduation requirements

Background

On June 14, 2023, the State Board of Elementary and Secondary Education (BESE) approved, as a Notice of Intent (NOI), revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §717. Reports of High School Credit; §2321. Appeals and Eligibility Requirements; and §2322. Senior Projects, regarding an appeals process for certain students who do not meet current graduation requirements. This Notice of Intent (NOI) was published on pages 1299-1303 of the July 20, 2023, issue of the *Louisiana Register*. The deadline to submit written comment, via the U.S. Mail, in response to the NOI was August 9, 2023, at 4:30 p.m.

Public Comments in Response to the NOI

• BESE received 15 written public comments, opposing the NOI, in response to the NOI. These public comments are included in backup pages.

Summary of Public comments in Response to the NOI

While it is true that of the comments received in response to the NOI were all in opposition, it should be noted that rarely do individuals submit comments in support of an NOI, given that the Board previously approved the NOI, and at this stage, the NOI is not necessarily in jeopardy of not becoming Final Rule. It is highly uncommon to receive a public comment in support of an NOI.

Several of the comments received in response to the NOI and reasoning have been summarized as follows:

- This policy would weaken the Louisiana diploma and would allow students, who lack basic skills, to graduate;
- An appeals process could be supported for English Language Learners;
- An inability for a student to demonstrate performance, via state assessment, indicates that a student has not been adequately educated, which may affect the Louisiana work force;
- The proposed appeals process allows the School Building Level Committee (SBLC) to make decisions without the input of the Local Education Agency (LEA) or Louisiana Department of Education (LDOE); and
- The proposed revisions would dramatically inflate School Performance Scores.

Also, there were several comments requesting a public hearing. Because at least one comment was received from an organization representing 25 or more individuals, a public hearing was subsequently scheduled, noticed, and held.

Response to Public Comments received in Response to the NOI

Mischaracterization of the Policy

First, the proposed revisions to §2318 of Bulletin 741 do not exempt any student from participating in the required assessments. The appeals process relates only to the requirement of obtaining a certain achievement level on the LEAP 2025. This mischaracterization of the policy as a "waiver" is inaccurate.

Value of the High School Diploma

This appeals process would not weaken or "water down" the Louisiana Diploma. In Louisiana, there are thousands of diplomas issued each year to non-public and homeschool students, all of which are not required to achieve a certain score on state assessments. Why should public school students be any different? The notion that diplomas earned by public school students, meeting a different standard than those of non-public school students, evidences an arbitrary rule that contradicts the argument of creating a "second class diploma." The appeals process eliminates this inequity and is actually a step toward equity in education in Louisiana.

Furthermore, the misrepresentation of the appeals process as giving students "participation trophies" or "a false representation of value" is an insult to students who have earned a Louisiana high school diploma via enrollment in a non-public school, homeschool, or through the April Dunn Act for students with disabilities. These students' diplomas were not contingent on a test score, yet their diplomas hold equal value. To devalue the education of students in a non-public school, homeschool, or special education is offensive to students and families who choose these options.

An example of over- generalization in regard to students issued a diploma is that it has been broadly stated that complaints from employers have been raised around current workforce readiness for individuals entering the workforce. It is unknown if these individuals entering the workforce received a public school education or otherwise. It has also been stated that a significant number of graduates require remediation in college: 41% in math and 25% in English. It is unclear if these students were graduates of public schools, non-public schools, or students with disabilities who benefitted from the April Dunn Act. To generally equate this lack of preparation to public school students only or to student unpreparedness is an oversimplification of this broad issue.

Precedent of other States

Louisiana is one of eight states in the country, which implements high stakes testing for the purpose of graduation eligibility; however, Louisiana is the only state in the country, which does not have an alternative method for students to demonstrate proficiency in the content being assessed.

The proposed appeal process creates a rigorous evaluation method in which, during senior year, a student who fails to achieve a "passing" score on the end-of-course exam in a testing pair may demonstrate proficiency using a portfolio. All students must continue to take all state assessments. The change will allow for an appeals process for purposes of graduation only.

It is a Louisiana-imposed requirement, not federal, that students must "pass a standardized test" to be eligible for graduation. This requirement places Louisiana among a handful of states who have continued a practice that most states have abandoned. Moreover, Louisiana is the only state with this regulatory burden on students that does not allow students an opportunity to demonstrate their knowledge in a manner other than a standardized test.

Policy Precedent in Louisiana

LA Revised state 17:183.3 provides a similar process for a student with an exceptionality, as defined in R.S. 17:1942(B), except a gifted or talented student, who meets the eligibility criteria as provided in R.S. 17:183.2(B)(1) and who successfully completes the requirements of his Individualized Education Program, including performance on any assessment required for graduation determined appropriate by his Individualized Education Program team, shall be issued a high school diploma. **"The student's Individualized Education Program team shall determine if the student is required to meet state or local established performance standards on any assessment for purposes of graduation."**

If a student's **Individualized Education Program team** determines that the student is not required to meet state or local performance standards on any assessment for purposes of graduation, the student shall be required to successfully complete Individualized Education Program goals and requirements and shall meet at least one of the following conditions, consistent with the Individualized Education Program:

- (a) Employment in integrated, inclusive work environments, based on the student's abilities and local employment opportunities;
- (b) Demonstrate mastery of specific employability skills and self-help skills that indicate that he does not require direct and continuous educational support from the school district;
- (c) Access to services that are not within the legal responsibility of public education or employment or education options for which the student has been prepared by the academic program.

A diploma issued to a student with an exceptionality, based on achieving his Individualized Education Program goals and objectives, shall count equally and be assigned the same number of points in the school performance score calculation for high schools as are assigned for a diploma issued to any other student. High school promotion determinations for a student with an exceptionality as defined in R.S. 17:1942(B), except a student identified as gifted or talented and who has no other exceptionality, who meets the eligibility criteria as provided in R.S. 17:183.2(B)(1) shall be made by the student's Individualized Education Program team.

One could argue that the proposed revisions to Bulletin 741 are a much more rigorous process. In order for a student to qualify for an appeal, the student must pursue eligibility requirements throughout his or her high school experience, and the student can only appeal during his or her SENIOR year. In order to be eligible, a student must complete ALL of the following:

- 1. Complete all Carnegie Units for TOPS University or TOPS Tech;
- 2. Demonstrate content proficiency by:
 - a. Meeting standard assessments requirements in a pair -and/or-

b. Completing a portfolio of work that meets the content proficiency requirement, as measured by the LDOE standardized rubric, for <u>BOTH LEAP 2025 courses in the assessment pairs in which</u> the standard assessment requirement was not fulfilled; and

- 3. Demonstrate evidence of employability by:
 - a. Earning a Silver or higher on ACT WorkKeys; or
 - b. Earning a TOPS Tech award; or
 - c. Earning a graduation-qualifying, Industry-Based Credential (IBC), outlined in Bulletin 741, §2319, regardless of the diploma pathway that the student is pursuing.

Given that the criterion for appeal is deliberate and rigorous, and given that the process is much more defined than that defined in law for students with IEPs, the appeals process could serve as an example in terms of the implementation of the process afforded to students with IEPs.

Policy Specific to Subgroups

In relation to several public comments stating that an appeals process could be supported for EL student only, coupled with the fact that a review process currently exists for students with IEPs, per Louisiana statute, limiting an appeals process to EL students further marginalizes **all other public school students**. Further, if an appeals process was limited to EL students only, it may be discriminatory to the two remaining subgroups under the Every Student Succeeds Act (ESSA), both of which would not have an avenue for appeal. Those subgroups being "race/ethnicity" and "socioeconomic status."

An appeals process specific to EL students would be problematic, as it conditions the opportunity for appeal to a student's English proficiency status. "English Learner" is meant to be a temporary designation for students learning the English language. A school is obligated to English Learners to *exit* these students from EL status under time-bound and performance criteria. Annual expected progress is outlined in LAC 28:XI.409. A perverse incentive to "keep students EL" would be introduced should only EL students be allowed to benefit from an appeals process. Divorcing appeals process eligibility from EL status rids us of this contradiction, holding both schools and students to the high bar of moving toward English proficiency.

Possibly more notable is that students issued 504 plans are not included in the law that allows students with IEPs to graduate when lacking the appropriate test score. Some students receive support at school under a 504 plan, rather than an IEP. Both can provide supports like accommodations and assistive technology, but a 504 plan is a plan for students with disabilities who need some adjustments to the learning environment to assist in needs in the classroom. 504 plans are not technically part of special education and are governed by a different law: not IDEA, but Section 504 of the Rehabilitation Act of 1973. This is a civil rights law, which gives people with disabilities equal access to all government services, including public education.

504 plans are meant to give students with disabilities equal access to all parts of the school day. Examples of a qualifying disability for which a 504 plan is issued would be a learning disability such as Dyslexia, Autism Spectrum Disorder, Visual Impairment (including blindness), deafness, and traumatic brain disorder. In summary to this point, there can be many notable and justifiable reasons that should qualify one for appeal and an appeals process for graduation should not be solely limited to students with IEPs or ELL students. Limiting the appeals process to one subgroup could be discriminatory and a violation of the civil rights of all other public school students.

Oversight of the Policy

In response to the notion that the appeals process will allow the School Building Level Committee (SBLC) to make decisions without the input of the LEA or LDOE, and the public comment regarding the dramatic inflation of the school performance scores, at the June BESE meeting, BESE amended the originally proposed policy to include language that the SBLC will determine if the student is eligible to graduate, via an appeal; however, the decision is subject to the approval of the LEA head. This amendment was made by BESE in order to address the very concerns that there would be input from the LEA.

Schools are required to report annually the number and percentage of diplomas issued via the appeals process per graduating cohort. If a school's graduating cohort exceeds 3 percent through appeals, the LDOE will conduct an audit, which will result in additional monitoring and data requests to evidence appeals processes in practice. A required triennial report of initial implementation findings by the LDOE will include the postsecondary outcomes of appeals process graduates. The report will highlight the percentage of college enrollment compared with non-graduates, the percentage employed after

graduation compared with non-graduates, and the types of Industry-Based Credentials earned through the appeal process.

Accountability

With regard to the inflation of SPS scores, this proposed policy is taken directly from the law regarding diplomas issued to IEP students, which states the diplomas issued, "**shall count equally and be assigned the same number of points in the school performance score calculation for high schools as are assigned for a diploma issued to any other student.**" Given that the legislature determined this was the manner in which the SPS would be calculated for students with disabilities who earn diplomas through the April Dunn Act, it would only make sense to do the same for students issued a diploma via this appeals process. It should also be noted that the one area in which the appeal will affect the accountability score is in the graduation component. The school and district still receives a zero for the LEAP component should a student require an appeal.

Given the stringent qualifying criteria, the number of students who will be issued a diploma via the appeals process will be minimal; therefore, there will not be a dramatic inflation in SPS scores.

Public Comments in Response to the Public Hearing

As requested, and in accordance with law, BESE held a public hearing on August 25, 2023, at 2:00 p.m., in Room 1-100, the Louisiana Purchase Room, located in the Claiborne Building, 1201 North Third Street, Baton Rouge, Louisiana; whereby individuals were provided the opportunity to provide oral or written comments at the meeting or submit written comments, via U.S. Mail, in advance of the hearing. The provision to submit written comments in advance of the public hearing is standard practice for all public hearings regarding Rulemaking.

The breakdown of the public hearing comments received was as follows:

- 108 written comments in **support**;
- 1 written comment in **opposition**;
- 17 public comment cards in support;
- 10 public comment cards in **opposition**; and
- <u>1 public comment card for information only</u>
- Totaling 125 comments in support and 11 comments in opposition

Response to Public Comments received in the Public Hearing

Implications on Course Performance or Quality of Instruction- Explanation and Data for this portion of the response is based on information obtained from the EXCEL presentation

This rule change does not allow for an alternate assessment, waiver of policy, or an alternate pathway for graduation. It simply institutes an appeals process for students in order to satisfy the standard assessment requirement for graduation via the portfolio by demonstrating proficiency in that regard, as opposed to achieving a certain score on standardized tests. Achieving a specific score on course assessments is not currently outlined in statute, but rather, the test must be administered to all students and scores are averaged into a student's course grade.

The appeals process will not allow for a course grade to be altered in any way. The LEAP exam is calculated at a minimum of 15% of a student's overall grade in a course. If a student earns a D in the class, failing the LEAP means the student will fail the course. Maintaining the requirement that a LEAP score should factor into a course grade ensures that students are successful throughout the course and demonstrates consistency in classroom performance.

To address concerns that an appeals process would eliminate the need for intervention prescribed by an SBLC or high-quality tutoring relative to a subject area, the policy requires that for each exam area, where the standard assessment requirement was not achieved, students must complete 30 hours of remedial or co-requisite instruction which is to be outlined in their individual graduation plan and evaluated for success at least annually.

Test Validity & Reliability

Other states have demonstrated accurate use of standard assessment measures – to diagnose achievement disparities, plan intervention for individual students, schools, and districts, and inform systemic practices. Using standardized tests as a determining factor for something as significant as a diploma is a violation of good psychoeducational practice. *Standards for Educational and Psychological Measurement*, states, "In elementary or secondary education, a decision or characterization that will have a major impact on a test taker should not automatically be made on the basis of a single test score."

While standardized assessments should be used for diagnostic purposes, significant disparities in subgroup performance may be indicative of a lack of technical adequacy of a test, as opposed to student deficiency.

Some examples from the 2021 LEAP Technical Reports:

Effect size (measured in Cohen's d) for LEAP.

Anything greater than 0.8 is considered "large" hence statistically significant. A larger number indicates a more significant disparate impact.

2021 LEAP	ELs effect	SWD effect	
English I	1.26	1.08	
English II	1.18	1.09	
Algebra I	0.72	0.88	
Geometry	0.70	0.68	
Biology	NR	NR	
USH	NR	NR	

Reliability (measured in Cronbach's alpha) for LEAP. Reliability ranges between 0 and 1. 0.9 is ideal/excellent. 0.8 is good. 0.7 is acceptable.

Anything below is questionable/unacceptable.

2021 LEAP	All	ELs reliability	SWD reliability
English I	0.90	0.85	0.85
English II	0.91	0.83	0.86
Algebra I	0.87	0.78	0.73
Geometry	0.91	0.86	0.85
Biology	0.874	0.759	0.815
USH	0.941	0.902	0.914

In exploring the effect size and reliability of two subgroups, it is evident that the performance for students with these characteristics may not be entirely represented. While student test scores should be used to inform classroom practices and academic intervention, given imperfections of the test, it is inappropriate to use a score as the sole determinant of granting a student a high school diploma.

Process & Feasibility

School Building Level Committees, an existing school-based structure, will be responsible for overseeing a student's appeal. According to Bulletin 741, §901, the School Building Level Committee is "at least three school level staff members. It shall be comprised of at least the principal/designee, a classroom teacher, and the referring teacher. It is suggested that other persons be included, such as the school counselor, reading specialist, master teacher, nurse, parents, pupil appraisal personnel, etc."

The efforts required to manage the student appeal process complements the work in which an SBLC already engages – meeting on specific students, reviewing data, creating intervention plans, and determining student supports. The documentation required for the appeals process is synonymous with that outlined in Bulletin 1508, *The Pupil Appraisal Handbook*, in regards to specification of the *Response to Intervention* process and that of Bulletin 1566, *Pupil Progression Policies and Procedures*, in terms of required intervention for students in transitional ninth grade.

It is important to note that the appeals process does not allow for default eligibility. Should a student not meet the standard assessment requirement, they are not automatically eligible for the appeals process. Students must earn eligibility criteria (evidence of content proficiency and evidence of employability) in order to be considered for appeal. Eliminating default eligibility ensures that schools are continuing to serve students with excellence and that students have a high bar of achievement.

While the role of the SBLC in the appeals process is significant, it is not the sole authority of determining a student's success of appeal. There are objective measures of student success required for appeal eligibility; the evidence of employability clause requires a student earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech Award eligibility, or a Jumpstart-approved, graduation-qualifying Industry Based Credential – these scores are all determined by objective, standardized assessments.

Estimated Impact

In years prior to COVID, approximately 5% to 7% of public school students did not meet graduation requirements due only to the fact that the required LEAP assessment scores were not achieved. During COVID, all students were allowed to graduate, via a waiver issued by BESE. The SPS scores for the years following were not hugely inflated. Naturally, scores were higher because ALL otherwise eligible students were issued diplomas. The appeals process would not allow ALL students to graduate, only those students who qualify and meet the appeals criteria. There is likely to be a very small percentage of students statewide graduating via the appeal.

Several factors can impact a student's ability to pass assessments required for graduation. The appeals process will benefit students with learning disabilities who do not qualify for an IEP, acute health conditions that result in loss of learning time, English Learners, testing anxiety, and parenting students. Students who struggle with the mechanics of test taking will be able to demonstrate their mastery of academic standards to an alternate, but equally rigorous, method. The option of this appeal would allow eligible students to demonstrate content mastery through a portfolio of work.

Workforce Readiness

The EXCELL Appeals Process requires evidence of employability. Students must earn a Silver on WorkKeys (the National Career Readiness Certificate), or TOPS Tech eligibility, or a Jumpstart-approved Industry Based Credential. These are <u>objective measures</u> of workforce readiness.

Students who appeal will leave high school with the skills needed to immediately enter the economy or pursue post-secondary technical training. Currently, students who don't "pass" the LEAP are drop-outs; the number of students who return for a fifth year simply due to the LEAP requirement is minimal. The LEAP exam does not measure (and is not indicative of) workforce readiness. However, the appeals process ensures that students are ready to contribute to the workforce and local economy.

Typically, by the end of sophomore year, it is evident that a student may need to pursue an appeal should they not have met the standard assessment requirement in at least one of the required assessment pairs (English, Math, or Sci/SS). Adjustments should be made on the student's individual graduation plan for the "evidence of employability requirement" through a course sequence aligning to prepare for and earn an IBC, an NCRC through the ACT WorkKeys or TOPS Tech Award eligibility. This adjusted course sequence will better prepare a student for their post-secondary pathway.

Louisiana has among the highest "youth disconnection rates" in the nation, with 16% of 16-24 year olds not being enrolled in education or engaged in employment. With the appeals process, students will be equipped with the workforce skills and qualifications necessary to participate in the economy and thus reduce the number of disconnected youth.

Post-Secondary Outcomes

One of the comments made in support stated that in Texas, the appeal process has demonstrated that:

- 1. Appeal graduates are engaged in employment at the same rates as graduates who do not use the appeal, an employment rate that is 40 points higher than that of a student who does not graduate;
- 2. For appeal graduates who attend community college their persistence rates are the similar to the national average of persistence for non-appeal graduates; and
- 3. Over the course of a decade, the range of graduates who use the appeal process is between 2 and 7 percent.

After researching this issue, data from the US Bureau of Labor Statistics reveals that 41.9% of high school dropouts are engaged in work or looking for work compared to 69.2% of high school graduates. Data on high school graduates in Texas who utilized the state's appeal process show they have employment rates that are statistically indistinguishable from national data on high school graduates. The assumption is that Louisiana can expect similar results for students who graduate using this new appeals process. The median weekly wage of a high school dropout is \$626 compared to \$809 for an individual with a high school diploma. Additionally, because the appeal has an employability component, we can expect a greater number of students graduating with an industry-based credential that is aligned with regional and statewide workforce needs.

<u>Response to the position letter, posted to the BESE BoardDocs website on September 30, 2023, as</u> <u>submitted by the State Superintendent of Education</u>

• The above referenced position letter, attached herein, states, "The fiscal note indicated that the proposed rule would result in an increase in state general funds without a designated funding source, yet the Senate Finance Committee and House Appropriations Committee were not consulted regarding the legislative appropriation of funds required by the rule in accordance with R.S. 49:961.E.(1)*"

First, it should be noted that when the board approved this policy revision at its June 2023, at no time was it expressed that the proposed rule would result in an <u>increase in the expenditures of state funds</u> or that additional staff would be required in order to implement this policy change. However, it was noted that this policy would require additional research of the LDOE, but concerns regarding the actual funding of this work were not specifically expressed.

In July 2023, the FEIS was initially submitted to the Legislative Fiscal Office (LFO) by the Executive Director of the BESE. Additional information was provided to the LFO by the LDOE, which reported that there would be an increase in expenditures because there is '**currently' no funding source available**."

On October 9, 2023, a revised FEIS was submitted to the LFO, by Dr. Boffy, BESE President, stating the following:

"BESE reports that the board can provide the LDE a funding source for this purpose from statutory dedications out of the Louisiana Quality Education Support Fund.

The Louisiana Constitution requires that 37.5% of the interest earnings from the Louisiana Quality Education Support Fund, commonly referred to as 8(g), be allocated to BESE for the enhancement of elementary and secondary education. One of the constitutionally allowable uses of 8(g) funds is "to fund exemplary programs in elementary or secondary schools designed to improve elementary or secondary student academic achievement or vocational-technical skills." BESE reports the proposed rule would fall under this allowable use. Based on projections adopted by the REC, Act 447 of the 2023 RS appropriated \$20.5 M in 8(g) funds to BESE for FY 24. As a result of certain schools not drawing down the allocations of these funds, BESE states there are adequate unallocated funds within the Block and Administrative categories in FY 24 remaining in order to provide to the LDE to fund implementation costs associated with the proposed rule in the current fiscal year. BESE additionally reports that, when planning the 8(g) budget for future fiscal years."

On October 10, 2023, the board approved the following motion

On motion of Dr. Davis, seconded by Ms. Orange Jones, the Board directed the State Superintendent of Education to evaluate the availability of ESSER funding to be used as a funding source to fund the implementation of the graduation appeals policy, beginning this school year until 8(g) funding can be permanently included in the LDOE statewide programs budget for future years.

Because there is now a funding source for costs associated with implementation, BESE contends that there will not be an increase in State General Fund for the LDOE. It is anticipated that the LFO will be forwarding the signed revised document to the BESE office for publication in the next edition to *The Louisiana Register* for publication.

• In Second, the letter from the Superintendent states, The Accountability Council was not consulted about the proposed rule in accordance with 20 USC 6573, seq. and LAC 28:XI.103.

LAC 28:XI.103 defines the function of the BESE Accountability Council as follows:

- Serve as the state Committee of Practitioners to conform to requirements in Title I of the Elementary and Secondary Education Act (ESEA) and to perform such duties of the committee to review, before publication, proposed or final State rule or regulation pursuant to Title 1;
- review rules and regulations that govern federal programs in Louisiana, noting that members shall be advised of substantial revisions in the federal programs supported through Louisiana's ESEA waiver; and
- advise the LDE on policy development of the state, district, and school accountability system

The proposed revisions do not relate to the function of the Accountability Council, in that the Louisiana Accountability System is not affected by this policy nor is the Accountability System changing.

ESSA requires that states establish an **accountability system**, which defines student performance goals and holds schools accountable for student achievement, using a **broad measure of student performance**, **not limited to test scores**. The indices and weights regarding the calculation of School Performance Scores are not changing and remains as follows, per LAC 28:XI.301:

K-8 School Performance Score Indices and Weights			
Index	Grades	Beginning in 2017-18	No Later than 2019-20
3-8 and high school LEAP 2025, Innovative Assessment, LEAP Connect, and ELPT [±] and ELPT Connect [*]	Grades K-7	75 percent	70 percent
	Grades K-8	70 percent	65 percent
Progress Index	Grades K-8	25 percent	25 percent
Dropout/Credit Accumulation Index	Grade 8	5 percent	5 percent
Interests and Opportunities	Grades K-8	NA	5 percent

In terms of the SPS calculation related to students issued a diploma under the appeals process, proposed policy states that, "students will be assigned the same number of points in the school performance score calculation for high schools as are assigned for a diploma issued to any other student." As previously noted in the summary report, this language is taken directly from state statute regarding this calculation as it pertains to students with IEPs. Coupled with the fact that this revision does not affect the overall Louisiana Accountability System in terms of indices and weights, advice from the Accountability Council was not sought by BESE. However, it should be noted that the LDOE has the authority to refer an item or seek advice from the council at any time.

Agency Response

Can Louisiana decrease the number of disengaged youth in our state with a carefully designed appeals process? What are the right guardrails to preserve the integrity of our accountability system and value of the high school diploma?

BESE believes this appeals policy does because of the following policy components:

- While a school-based team recommends whether or not a student has met the portfolio requirements, the ultimate decision to grant the appeal rests with the superintendent. This adds a layer of scrutiny that is not in the Texas model;
- If more than 3% of graduates at a school site use the appeal, the site is subject to an audit by LDOE. If the site has failed to comply with the requirements of the appeal process, corrective action must be taken, and the state superintendent approves appeals at the site in the following year;
- To counter the argument that the portfolio is too subjective, none of the employability requirements are subjective:
 - TOPS Tech Award eligibility; or
 - An ACT WorkKeys score of silver or higher; or
 - A graduation-qualifying industry-based credential;
- Each appeal applicant is required to take the EOC at least twice. There is every incentive for the school site and the district to encourage students to pass the EOC after providing the 30 hours of

required interventions. The school and district still receive a 0 for the EOC component should they require the appeal process for a subject area;

- This will not open the floodgates because most students who fail the EOC are also failing the class;
- The EOC counts for at least 15% of a student's overall grade in a course. If a student earns a D in the class, failing the EOC means the student will fail the course. This is why the COVID waivers for EOC exams barely moved school SPS scores.

This is a narrowly tailored process, and the aforementioned are all guardrails that go beyond the Texas model, one that has proven successful, to create additional protections.

Louisiana students deserve to have the same opportunities as every other high school student in our country to demonstrate their knowledge and skills in formats beyond a standardized test score.

Agency Conclusion

The Appeals Process places Louisiana in the forefront of the national K-12 landscape. As other states shift focus to preparation for soft skills needed for college persistence and industry-specific skills needed for career readiness, best practices nationwide were researched to integrate in the creation of the appeals process. In order to appeal the assessment requirement, students must demonstrate evidence of content proficiency (through formative assessments) and evidence of employability (through earning an Industry Based Credential or the National Career Readiness Certificate).

BESE anticipates that the Appeals Process will help decrease the alarming number of disconnected youth, a troubling trend that is mirrored nationally. Because students who appeal will graduate with both a high school diploma and employability skills, more young people will become employed or enroll in post-secondary education upon exit of the K-12 system.

Standardized assessments are a valuable tool for identifying disparities in educational outcomes and designing strategic interventions. BESE recognizes, however, that a superficial cut score should not determine an individual's post-secondary trajectory.

The Louisiana Board of Elementary and Secondary Education is committed to leading on, seeking out, and supporting equitable solutions to address barriers that may inhibit any student from pursuing educational attainment, workforce participation, and desirable life outcomes.

With these consideration in addition to significant public support, BESE recommends moving forward with the adoption of revisions to Bulletin 741, *Louisiana Handbook for School Administrators*: §717. Reports of High School Credit; §2321. Appeals and Eligibility Requirements; and §2322. Senior Projects, regarding an appeals process for certain students who do not meet current graduation requirements.

ATTACHMENT #9

LDOE Summary of Public Comments and Agency Response

DR. CADE BRUMLEY STATE SUPERINTENDENT



CLAIBORNE BUILDING 1201 N 3RD ST. BATON ROUGE, LA 70802

LOUISIANA DEPARTMENT OF EDUCATION

Dear Members,

After carefully reviewing written feedback and intently listening to public testimony, the position of the Louisiana Department of Education (LDOE) remains unchanged – the proposed graduation appeals process is bad public policy for the State of Louisiana. The grandmother of ten, who provided a written objection wherein she likened a diploma under this proposed policy to a "participation trophy," makes a strong argument.

At its core, the proposed graduation appeals process dangerously signals to our state and nation that Louisiana's educational system is incapable of providing – and students are unable to attain – a minimum standard of proficiency in required subjects. We should continue the exploration and expansion of academic and support options for students, not impose a government-sanctioned excuse for mediocrity.

In a state with long-challenged educational outcomes, there is no room for falsely inflated results offering a disservice to our ongoing noble pursuit of authentic educational improvement.

When students graduate from a Louisiana high school, employers and universities must have confidence that graduates hold a minimum proficiency in spoken and written English, foundational mathematical abilities, core appreciation of American civics, and basic scientific reasoning skills. Equally important, the students themselves should hold these fundamental skills to secure life, liberty, and the pursuit of happiness.

In addition to LDOE's belief that the proposed graduation appeals process is bad public policy, LDOE also holds that the following material missteps were made during the creation of the proposed rule:

- The Accountability Council was not consulted about the proposed rule in accordance with 20 USC 6573, *et seq.* and LAC 28:XI.103.
- Adequate input was not sought from stakeholders, including teachers and business leaders, who will be significantly impacted by the proposal.
- The fiscal note indicated that the proposed rule would result in an increase in state general funds without a designated funding source, yet the Senate Finance Committee and House Appropriations Committee were not consulted regarding the legislative appropriation of funds required by the rule in accordance with R.S. 49:961.E.(1).

Therefore, LDOE recommends the Louisiana Board of Elementary and Secondary Education (BESE) abandon the rulemaking process for the present Notice of Intent (NOI).

Furthermore, LDOE recommends formalization of alternative solutions presently being explored by LDOE, including a robust, explicit partnership with the LCTCS to provide high school students with programming to prepare them for the HiSET while also allowing them to earn DE credit, paving a path to the community college system or to the workplace.

Sincerely,

Rent Carl Bruf

State Superintendent of Education

Summary of Public Comments and Agency Response¹

Proposed Revisions to Bulletin 741 - Louisiana Handbook for School Administrators

Background on the Proposed Policy

In March 2023, BESE directed the LDOE to prepare recommendations to be heard at the April 2023 meeting regarding an alternate graduation pathway for English learners (ELs). The recommendations were to include the following:

- whether emergency policy could be considered to grant a standard high school diploma for ELs who entered Louisiana public schools during or after the seventh grade but did not qualify for a diploma due to failure to achieve a passing score on one or more required assessments and
- whether policy and legislative action could be considered to permanently grant diplomas to these students as long as they were making progress toward learning the English language and could complete a portfolio of work related to the courses for which they were lacking a passing score.

At the April 2023 BESE meeting, LDOE presented initial findings regarding outcomes for Louisiana ELs, recommending further study into the efficacy of EL programming to improve not only rates of graduation but also rates of English and content proficiency in all subjects. BESE responded by directing the creation of a task force to study challenges in ELs and to develop a state plan for EL education. In addition, BESE directed the drafting of policy to create a graduation appeals process – morphing from an English-learner-focused measure to applicability for all Louisiana students. Citing significant legal, practical, and philosophical issues with the proposal, LDOE declined to further participate in the development of policy language. Instead, LDOE recommended conducting further research and study into the underlying issues resulting in low EL graduation rates rather than the hasty adoption of a makeshift policy solution.

Despite objections from the LDOE, BESE approved, as a NOI, a policy creating a graduation appeals process for Louisiana students in June 2023. The proposed revisions would allow certain students, who were not able to graduate on time due to failure to achieve a passing score on an assessment required for graduation, to complete a portfolio and receive a standard high school diploma. To be eligible for the appeal, a student must have earned all Carnegie units required for a Louisiana standard diploma and must also achieve a minimum score on the ACT WorkKeys assessment, be eligible for a TOPS Tech award, or earn an industry-based credential. For students who entered a freshman cohort during or after the 2022-2023 school year, the portfolio would be scored by a standardized rubric. Candidates who entered a freshman cohort prior to 2022-2023 may satisfy the requirement by "completing a portfolio" aligned to one course in each lacking assessment pair.

The proposed rule was published as a NOI in the July 20, 2023, edition of the *Louisiana Register*. Among the comments were requests for a public hearing from organizations with more than 25 members; this hearing was held on Friday, August 25, 2023. This report includes a summary of comments in support, a summary of comments in opposition, LDOE's response to comments in support, LDOE's response to comments in opposition, and LDOE's recommendations for action in response to the comments.

Summary of Public Comments Received

Fifteen written public comments were received during the noticed public comment period, all in opposition to the proposal. The BESE office allowed for further written comments to be submitted in advance of the public hearing, and 108 additional written comments were received in support of the proposal, many in response to the written comments initially received and submitted on a form letter template. One additional comment in opposition was received during the additional period. During the public hearing, an additional 25 oral comments were received. A summary of themes in the public comments is provided in the following paragraphs.

¹ This SPCAR, and the content herein, was developed solely by LDOE staff.

Summary of Comments in Support of the Proposal

Other states with high-stakes high school assessments have an appeals process.

• Frequently mentioned among commenters was the idea that Louisiana should have an appeals process because other states have established an appeals process. It was often cited that only eight states, including Louisiana, require that students pass an assessment in a core subject as a prerequisite for graduation. It was argued that the proposal keeps students from what commenters described as the only alternative - dropping out of school.

Inequities for English learners.

- Time. Commenters remarked that ELs have insufficient time to achieve English language proficiency. Citing the English language proficiency trajectory table in LAC 28:XI.409, commenters argued that it takes five to seven years for students to reach English language proficiency and that late-entry ELs have insufficient time to master the language before being required to use English to demonstrate content mastery.
- Effort. Commenters remarked that ELs deserve a diploma for attending school and working hard to meet course requirements.
- Educator training. Commenters remarked that teachers have had insufficient training in second language acquisition and gave examples of students who, with proper instruction, were able to be successful in both coursework and in standardized testing.
- Relevance. Commenters argued that while students may have insufficient English language proficiency to pass an assessment, they have sufficient proficiency to successfully contribute to the community.
- Assessment mode. Commenters argued that a portfolio measures knowledge of content rather than English proficiency and still requires that graduates demonstrate content proficiency.

Prioritized student preparation for the workforce.

• Commenters argued that a portfolio appeal allows students to invest more time into other pursuits (e.g., ACT prep, workforce training, mentoring services). One commenter remarked that the process will be focused on content while requiring practical skills needed for success.

Differing ideas of the significance and meaning of a high school diploma.

• Commenters offered differing ideas about the meaning and significance of a high school diploma, arguing that a diploma is needed to support the next steps in life. One commenter remarked that students have a civil right to a quality education and that a diploma is evidence that a student has received a quality education. Another said that a diploma is more meaningful when students are included who were previously left out. Another commenter argued that a high school diploma should indicate that students have studied certain subjects, with a transcript as an indicator of the rigor of the high school experience. Another suggested that a diploma is the right of students who attend school and work hard in class. Several remarked that an appeals process will not decrease the value of a diploma.

Strengths of policy language.

Commenters touted purported strengths of the policy language, including the following:

- Local oversight is provided by having the district superintendent serve as the final authorizer.
- Employability requirements are strong and ensure that students are not just passed along.
- Students are required to take each failed assessment twice.
- A 3% auditing threshold will ensure only a small number of students benefit from the appeals process.
- Thirty hours of remediation are required in each failed subject.
- The portfolio requires mastery in both subjects in each assessment pair.
- Students are not automatically eligible for appeals.
- Portfolio scoring does not represent an ethical concern because the only special interest teachers have is that of their students.

Flaws in the current assessment system.

- Repetitively taking an assessment is counterproductive. Commenters gave examples of students taking a single assessment as many as 22 times to achieve a passing score. Some of these students had achieved certifications in safe food handling, customer service, or even welding but had difficulty passing the required state content assessment.
- Tests are unfair for minorities. Commenters listed bias, lack of reliability, and the potential for discrimination in testing as reasons that the current practice is unfair. Arguing that standardized testing should not be the only tool used to measure aptitude and that tests should not reflect ability, commenters said that students are working hard to pass a test that has not been designed for them. One commenter remarked, "Standardized testing is the opposite of equity," while another said, "A diploma should allow students to shine in multiple ways." Another said that ways of being equitable are changing because students are changing.

Summary of Comments in Opposition to the Proposal

Diminished value of the Louisiana high school diploma.

• Commenters expressed concern that the proposed policy will lower standards to receive a high school diploma, devaluing the diploma for all Louisiana students, and favored instead raising or maintaining standards while providing support to those students in need. The appeals process was criticized as a second-class diploma. One commenter argued that the value of a diploma is "in its perceived assurance that graduates have the knowledge and skills required to be successful in post-secondary education, the workforce, or military service." Another commenter likened a diploma obtained through appeal to a commercial item falsely labeled with a popular name brand, arguing that the addition of a label to a set of accomplishments does not infuse those with the quality of a different set of achievements.

Increased likelihood of poor student outcomes after high school.

- Commenters expressed concern that the proposed policy will mask struggling students' lack of preparedness to be successful in postsecondary pursuits, creating a competitive disadvantage in the job marketplace and setting the goal of school as graduation rather than readiness. Further concerns included that the proposal would result in certain students not getting the support they need since they could just wait for an appeal. It was argued that educators must consider whether students have truly been educated in a way that will provide them with the opportunities they need later in life.
- A commenter pointed out that most careers require an assessment at some point and that students need to be prepared to overcome adversity. It was argued that the real world does not issue a reward without having met a standard and also does not change the standard for the individual.
- A further concern was a projected increase in the need for remedial instruction in postsecondary pursuits, resulting in additional costs and time for students. Commenters implored BESE to strategically address academic gaps rather than developing detours from the consequences of poor academic performance.
- Commenters also proposed guiding struggling students toward alternate exit pathways, such as the HiSET.
- Commenters requested that BESE develop a comprehensive planning protocol to address the needs of struggling students and ensure they are likely to be successful in college, career, or service. Interventions and high-dosage tutoring were cited as measures successfully used to catch up students who have fallen behind. One commenter advised to apply resources while students are in high school, ensuring they have what they need to be successful.

Adverse impact on competition and employment.

• Commenters expressed concern that the proposed policy will increase the difficulty of identifying wellqualified candidates for employment, creating confusion and uncertainty about whether the diploma can be trusted as a measure of reasonable expectation of competence. One commenter argued that an assessment must serve as an objective signal to employers.

- Commenters expressed concern that the proposal will likely increase the burden on employers of providing additional training for new hires who lack basic skills, as well as undermining efforts to improve employee recruitment and retention.
- It was argued that a high school diploma provides prospective employers a presumption of a minimum level of academic proficiency, which would be compromised by the proposed appeals process. A period of time was requested for feedback from workforce development leaders and employers.
- Representatives of workforce and business organizations expressed immense concerns that the proposed policy walks back efforts to improve the quality of public education. One commenter stated that the proposal "opens the door for tolerance of a school's failure to perform, contradicts our effort, and underserves our students."

Ethical concerns regarding implementation.

- Commenters expressed concern that the proposed appeals decision is made entirely at the school level, with no case-level oversight from the local governing authority or LDOE. While the state accountability system attempts to provide an objective assessment of student, school, and district performance, it was argued that the proposed appeals process creates subjectivity for some students in an attempt to address learning barriers. Further, commenters argued that a locally scored portfolio appeal leaves too much room for bias by those who would benefit from successful appeals. Further, commenters argued that the portfolio appeal presents itself as an option for students who struggle with assessment, while still requiring an assessment, only with a lower passing requirement.
- Another commenter expressed concern with the inherent subjectivity of the process and its inevitable variability from district to district and from school to school. Citing the school performance score component of graduation rate as worth 20 percent of the total score, committees determining the success of appeals may experience internal and external pressure to rule favorably.

Implications for school and district accountability.

- Commenters expressed concern that the proposed rule will exacerbate the over-inflation of high school performance scores. Citing issues with the way in which students are reported as successful, especially in comparison with the way in which students in lower grades are reported as successful, commenters argued that the proposal will facilitate rewarding high schools for negative student outcomes.
- Further concerns were expressed that schools not fully meeting the needs of students may evade accountability measures and identification. As graduation rates comprise a sizable portion of high school performance scores, which impact subjectivity to state intervention and eligibility for federal school improvement funding, artificial inflation of graduation rates and school scores could mean that some schools and students will not receive the help and funding they need to legitimately improve.
- Further concerns were expressed that the required exams may be rendered effectively meaningless, allowing students to apply for an appeal instead of striving toward proficiency. As the proposed policy would result in an inflation of high school performance scores, implications for the statewide accountability system were expressed as a lowering of standards and a cause for further, in-depth review over an extended period of time and with the input of all stakeholders.
- Commenters expressed concern with the current accountability system. One warned that the proposal will "degrade the current accountability system," which others described as composed of standards that are "already too low." Reminding the public that the required passing level on the test is two levels below proficiency, commenters urged education leaders to not take lightly this significant change to established minimum diploma standards. Further, the proposal was described as a way to circumvent already low graduation requirements.

Additional workload for school personnel.

• School Building Level Committees (SBLC) are responsible for the implementation of the appeals process under the proposed policy. Commenters expressed concern that high school SBLC facilitators and committee members including teachers, counselors, and school administrators will experience a significant increase in workload under the proposal.

Inequities for struggling students.

• Commenters expressed concern that struggling students may be funneled toward an appeal pathway instead of receiving needed support, creating a lower-tier pathway that results in missed opportunities. The proposed policy does not require students to attempt an exam more than once. One commenter argued that the public education system should provide a legitimate opportunity for every child to be successful.

Inequities for English learners.

• Commenters expressed concern that the proposed policy does not fully address the concerns of ELs, with no consideration in the proposal for students' attainment of English language proficiency or other concerns specific to ELs. Concerns were raised about the transparency of the policy development, which started with legitimate concerns about the low graduation rate of ELs and ended with a universal assessment appeal for a large number of students. Further, commenters argued that any appeals process for ELs should be considered separately from addressing concerns about the quality of EL programming and issues faced by these students.

Inequities for students earning a high school diploma via the traditional path.

• Commenters expressed concern that students who earn a high school diploma by both completing coursework and passing requisite exams will lose a competitive advantage earned through those attainments. Further, they would be viewed the same in terms of their abilities for employment opportunities in competition with each other.

Lack of transparency and research.

- Commenters expressed concern that few stakeholders were engaged in the development of the proposed policy. Teachers, school-level personnel who would be responsible for managing the appeals process, business leaders, education experts, community members, and others should have been consulted prior to adopting such a sweeping change.
- Commenters suggested that the task force established through board motion should be formed and properly consulted regarding the advisability of such a policy. The Accountability Council (AC), which must be consulted regarding issues related to accountability according to the Elementary and Secondary Education Act (ESEA) as well as BESE policy, should also be formally invited to review the proposal, as should the College and Career Readiness Commission.
- Further research and national consultation were recommended into the implications for ELs and for all students since the approved policy extended portfolio appeal to all Louisiana students.

Excessive breadth of applicability.

• Commenters expressed concern that deep flaws in the proposed policy will result in its overuse and argued that if an appeals process is developed, it should be rarely used in a limited set of circumstances. A concern was raised that waiving the standard assessment passage requirement could result in never addressing the academic deficiencies of thousands of students across Louisiana.

Funding and administrative concerns.

• Commenters expressed concerns that the proposed policy is not properly funded and will lack the administrative resources needed. Excessive additional requirements on school staff will increase the already heavy workload on teachers.

Issues with policy language.

Commenters expressed several concerns with the text of the policy, citing additional concerns as outlined.

- Requires the reporting of information that does not exist, cannot be requested, or may require legislative action.
- Significantly restricts LDOE's ability to audit implementation, especially for schools with an undefined unique population.
- Possible conflict in authorizing authority.
- Unclear reference to content proficiency.
- Ambiguity regarding mastery demonstration of employability skills, strength of industry-based credential attainment, and designation of qualifying credentials.
- Ambiguity regarding the retroactive nature of diploma issuance.
- Ambiguity regarding the required appropriate academic supports.
- Ambiguity regarding the scope of the required additional unfunded requirement of LDOE to develop a list of strategies and technical assistance for at-risk students.
- Possible student safety issues regarding the provision of student information to and the involvement of unauthorized adults for services that may not be available to underage students.
- Ambiguity in additional requirements that may be considered for student appeal.
- Ambiguity regarding requirements for an evaluation of student preparedness for postsecondary success.
- Multiple undefined terms and unworkable requirements.

Negative implications for postsecondary education.

• Commenters expressed concern that the proposed policy will create a burden on postsecondary institutions to provide remedial instruction for students not ready to engage in on-level coursework.

LDOE's Response to Comments in Support of the Proposal

Other states with high-stakes high school assessments have an appeals process.

- While other states may abandon objective assessments as a means of ensuring that all students have met challenging academic standards, LDOE maintains the expectation that every student meets a minimum level of achievement.
- The most frequently stated reason that Louisiana should have an appeals process is that other states have one. While the bandwagon approach to policy adoption is not new, it is hardly justifiable logic for rulemaking that will lower academic standards in Louisiana.
- The school system's staff has already determined they believe the student has met this standard in that they have earned passing grades in all of their courses. Therefore, LDOE has concerns about the validity of a portfolio assessment as a standardized measure of student proficiency. While some students may be assigned rigorous portfolio work that is graded according to expectations consistent with standards mastery, other students may not experience the same level of rigor. This will vary among students, schools, and systems.
- Further, LDOE has concerns about the early reports of student outcomes seen in other states with portfolio graduation options in place. While, unsurprisingly, graduation rates did increase in Texas over the period studied, the percentage of portfolio graduates attempting higher education decreased, and postsecondary retention rates remained low for these students². While a majority of these students did find employment, no information is available about their type of employment, quality of life, or career advancement opportunities. While portfolio graduation may appear to solve the problem of low graduation rates, there is insufficient information to conclude that it actually makes a long-term positive impact on student outcomes. It is just as likely that this change will signal to industry and higher education a lack of consistency in Louisiana's

² Texas Higher Education Coordinating Board. (2022). Higher Education Outcomes of Texas Public High School Individual Graduation Committee (IGC) Graduates. Austin, TX.

diplomas, erasing any positive outcomes that would have previously been afforded by having a high school diploma for all students, whether earned objectively or subjectively.

• LDOE contends that a better solution for students is bridging secondary with postsecondary opportunities through challenging standards, connections to post-secondary education, industry-recognized preparation opportunities, rethinking the school day, high-dosage tutoring, and strategic support to ensure that all students are propelled to postsecondary success.

Inequities for English learners.

- Time. While it is true that it takes time to master skills, including the English language, given what is within our control, LDOE errs on the side of achievement not completion for students.
 - There are two variables in this process within some control of policymakers time and expectation.
 - This policy chooses to ignore the ways in which the expectation can be maintained while also affording students more time in favor of ending the student's high school career still unable to pass state assessments and have the requisite knowledge needed to thrive.
 - o It is possible for students with limited English to achieve a passing score on content assessments.
- Effort.
 - LDOE applauds the effort that many ELs devote to educational achievement. A strong work ethic will serve these students well in life and in future endeavors.
 - Individual levels of effort to attain a standard varies across all manner of endeavors, constituting the transaction cost of attaining the standard. Providing additional time for students to reach the minimum expectation of ability to pass an objective assessment will serve students far better than changing what it means to earn a high school diploma.
 - Effort should be a basic expectation of our diploma. Louisiana's employers and community members must be assured that minimum academic proficiency, rather than the effort made to acquire such, establishes the bedrock of the expectation for Louisiana graduates.
- Educator training.
 - LDOE agrees that educators must be prepared to address the unique challenges of ELs. This need for improved training to accelerate student academic achievement does not mitigate the need to maintain an objective measure of graduate readiness.
 - o LDOE is actively engaged in developing professional development opportunities for educators.
- Relevance. The required standardized assessments are centered on the Louisiana Student Standards, which BESE has established as representative of "the knowledge and skills needed for students to successfully transition to postsecondary education and the workplace, as determined by content experts, elementary and secondary educators and school leaders, postsecondary education leaders, and business and industry leaders.³" Louisiana has established a competency-based education program with content standards set through a deliberative public process. Thus, assessment content measuring student mastery of the standards is relevant to students' postsecondary transition.
- Assessment mode. The portfolio assessment as required by the proposed policy is not an objective measure of student content knowledge. Rather, local determination and scoring of tasks almost ensures that content proficiency will be measured differently from student to student, creating deep inequities that will be unobservable from the state level. The proposal also creates inequities between appeals students and those who demonstrate proficiency through state assessments. Students taking state assessments complete them in a limited, closely measured time period, with close attention given to environmental stimuli, the type of interference allowed by adults, and resources available for student reference. Appeals students, however, will have no standardized expectation for the amount of time allowed or for a secure environment. It can be argued that since students may have access to additional materials and resources, the portfolios will not be guaranteed as a measure of what students know. And with no oversight on adult interference, portfolios are

³ R.S. 17:24.4

not a guarantee of what students are able to do. Further, while commenters argued that a portfolio measures knowledge of content rather than English proficiency, the portfolio will still be completed in English with the exception of a portfolio for a math course taught in Spanish. It is curious that students would be unable to independently complete tasks in English on a standardized assessment but able to independently complete tasks in English on a standardized assessment but able to independently complete tasks in English on a standardized assessment but able to independently complete tasks in English on a standardized assessment but able to independently complete tasks in English on a portfolio assessment.

Prioritized student preparation for the workforce.

- LDOE agrees that the high school experience should prepare students for workforce success and has been a robust leader through Fast Forward and Jump Start to expand opportunities for apprenticeships; internships; work-based learning; industry-based credentials; and strategic partnerships with business, industry, and higher education.
- However, the proposed rule is flawed in that it sacrifices academic proficiency for an inconsistent attempt at workforce preparation. The level of workforce preparation required under the portfolio does not represent rigorous, nor life-changing, nor substantive improvements in a student's workforce preparation.
- Further exploration into accountability measures that would incentivize school districts to strategically employ high-level Career and Technical Education (CTE) opportunities while maintaining rigorous academic expectations is warranted.

Flaws in the current assessment system.

- Repetitively taking an assessment is counterproductive. LDOE agrees that repetitively taking the same course while expecting different results is an unwise use of time and resources. Instead, identifying core areas requiring support for future success coupled with aligned high-dosage tutoring, high-quality instruction, and strategic interventions are crucial for helping students succeed. Additionally, exploring innovative scheduling opportunities will better support long-term positive outcomes for students. If red-tape reductions are needed, LDOE welcomes those requests in accordance with R.S. 17:4041-4049 and LAC 28:CXV.344.
- Tests are unfair for minorities.
 - LDOE asserts that Louisiana's assessments are fair measures of the depth and breadth of our standards. They accurately assess each student's ability to engage with high school content. Our items undergo extensive review to ensure they are aligned with our state's rigorous standards.
 - o A lower passage rate does not mean the assessment is biased.
 - Graduation outcomes account for about half of the state's accountability formula; currently, our state
 assessments form the last barrier to a completely subjective determination of what it means to be a
 Louisiana graduate. This would remove the last objective measurement in Louisiana's diploma
 requirements and will likely result in a less prepared population of students, fundamentally changing
 the value of the Louisiana High School diploma.

LDOE's Response to Comments in Opposition to the Proposal

Diminished value of the Louisiana high school diploma.

• LDOE agrees that the proposed policy devalues the Louisiana high school diploma. By instituting ambiguous parameters evaluated through highly subjective means, the expectations for what all students should know and be able to do will decrease. LDOE supports a rigorous academic program for all students, enabling them to be successful not only in high school but also in future academic and career endeavors. A diploma's value must be based on more than effort; a minimum expectation for the quality of its composition is essential to building a high-value credential that will enable Louisiana graduates to competitively engage in an increasingly global workforce and economy. It is the work of schools to educate students – students failing to meet minimum proficiency standards should receive high-quality instructional support, as should schools that persistently struggle to help students reach minimum proficiency standards.

• Questions have arisen regarding the minimum grade level proficiency required for a diploma. While it is not possible to directly link proficiency levels to grade levels, it is reasonable to wonder the grade level at which a student who scores unsatisfactory would be able to demonstrate mastery. Society should be able to expect that a student with a high school diploma has mastered high school content. We must expect more of our students, educators, and education system.

Increased likelihood of poor student outcomes after high school.

• LDOE agrees that students who are unable to achieve a score within the Approaching Basic range (level 2 of 5) on required assessments will likely experience great difficulty in postsecondary endeavors. Approximately 14,000 students in Louisiana colleges were enrolled in remedial math classes last year, and approximately 4,000 students were enrolled in remedial reading classes. This number is likely to increase under the proposed policy, resulting in greater cost to students and decreased likelihood of program completion.⁴ Further, these students will be more likely to experience difficulty in successfully navigating basic societal requirements such as the income tax system, retirement planning, purchasing health insurance, and completing written workplace training and task requirements. Moreover, ELs achieving a diploma in this manner are less likely to ever become proficient in English, possibly resulting in an increase in the number of long-term ELs in Louisiana, as has been seen in Texas⁵.

Adverse impact on competition and employment.

LDOE agrees that lowering diploma standards through an appeals process will likely neutralize the high school diploma as a means of determining the quality of candidates for employment. Students unable to achieve a score within the Approaching Basic range will be less likely to be able to comprehend and accurately respond to written information and directions without additional support and training provided by the employer. At present, employers can depend on graduates having a minimum level of proficiency, which would be abolished under this proposal. The Administrative Procedure Act in R.S. 49.961 requires consideration of "the impact of the proposed action on competition and the open market for employment." Further engagement should be conducted regarding this issue with business, industry, and economic development professionals. Additionally, study into the long-range economic impact of similar measures in states with comparable demographic and economic attributes should be conducted to fully appreciate the impact on competition and employment.

Ethical concerns regarding implementation.

- Opportunity for bias, lack of reliability, and potential for discrimination exists within a portfolio process that includes one scorer and no process for interrater reliability.
- LDOE agrees that the proposed policy is ethically suspect, with abundant opportunity for overly broad implementation and, thereby, personal and professional gain for those who would choose to misuse it. Eligibility determinations can also be potentially misapplied to favor a particular subgroup of students so long as the total number of students issued appeal diplomas remains below the auditing threshold. With only limited auditing authority and oversight, LDOE will have little ability to mediate concerns and intervene when needed.

Rerouting around the Accountability Council.

• The ESEA, as amended by the Every Student Succeeds Act (ESSA), requires that every state receiving funds under the title have a committee of practitioners to advise the state in carrying out its related responsibilities. In Louisiana, the Accountability Council (AC) serves this purpose. The group was involved with adoption of

⁴ Nietzel, M. T. (2018, October 22). Remedial education: Escaping higher education's Hotel California. Forbes. https://www.forbes.com/sites/michaeltnietzel/2018/10/22/remedial-education-escaping-higher-educations-hotelcalifornia/?sh=51df94c85f20

⁵ Cashiola, L., & Potter, D. (2021, April). Long-term English learners (ltels): Increases in ltels in Texas (part 2): Kinder Institute for Urban Research. Kinder Institute for Urban Research | Rice University. https://kinder.rice.edu/research/increases-long-term-english-learners-texas

the Louisiana ESSA State Plan and must also be provided with any proposed rules, regulations, and policies related to the title. Section 1603 further requires a review by the committee, "before publication, of any proposed or final State rule or regulation pursuant to this title⁶." The AC should have been consulted regarding the advisability of the rule prior to publication, especially since the rule codifies the circumvention of school responsibilities regarding the attainment of English proficiency and the measurement of the degree to which school ensures that students develop high levels of academic achievement in English, stated as the first purpose of the English Language Acquisition, Language Enhancement, and Academic Achievement Act.

• BESE policy in LAC 28:XI.103 also requires review by the AC prior to publication of proposed or final State rule or regulation pursuant to Title I. As the policy proposal relates to state assessments, collection of data regarding migratory students, ensuring the continued validity and reliability of state assessments, and other elements of Title I, the AC should have been consulted prior to consideration of the policy proposal by BESE.

Implications for school and district accountability.

• LDOE agrees that the proposed policy will likely have an impact on school and district accountability, increasing both high school performance scores and district performance scores. Further study is warranted into the implications for the school and district accountability system in addition to consultation with the Accountability Council in accordance with state and federal law.

Additional workload for personnel.

- LDOE agrees that implementation of the proposed policy will result in additional workload for school personnel. SBLC facilitators and members would need to facilitate the appeals process in addition to the work currently expected of them in state and federal statute. Taking into consideration the number of students potentially impacted by the proposal, the teacher and SBLC team workload required only for preparation and facilitation of meetings will increase dramatically. This does not account for the time required to administer portfolio tasks, grade these subjective assessments, and complete the required paperwork. Teachers will need to be trained in the portfolio requirements and will take on the additional task of grading a significant number of high school-level portfolio entries. With teacher retention issues plaguing the education system nationwide and in Louisiana, adding additional subjective grading assignments to the already significant workload carried by teachers will only contribute to the crisis. LDOE is pursuing multiple avenues to improve teacher recruitment and retention and advises against any undue increase in educator workload. Further, the Louisiana legislature has recently expressed interest in reducing the number of trainings required for teachers⁷, of which there are many, rather than instituting entirely new protocols necessitating extensive teacher training for implementation. The Teacher Advisory Council should be consulted regarding the potential impact of this policy on teachers.
- LDOE will also require additional staff to implement the policy, as additional positions will need to be requested and funded to fulfill the requirements of the proposal. Already responsible for monitoring centered on a number of other areas, existing staff cannot effectively absorb the additional task of monitoring schools whose approved diploma appeals exceed the three percent auditing threshold. Further, since there is no authority to effectively limit the number of approved appeals so long as the issuing school serves a "unique" population and is in compliance with eligibility requirements, LDOE will essentially audit each of these schools every other year.

Inequities for struggling students.

• LDOE agrees, as mentioned above, that implementation of the proposed policy could result in inequities for struggling students. Students may be channeled through an appeal portfolio pathway rather than addressing academic deficits to meet standards. Without a requirement for students to meet the expectation, certain

⁶ Public Law 114-95, Title II, § 2002, Dec. 10, 2015.

⁷ R.S. 17:420

groups of students may not receive appropriate support to achieve the standard and instead a portfolio will be used, thus having a different expectation for these struggling students. Holding some students accountable for mastery while requiring only completion from other students will result in instructional disparity. Monitoring the impact of this is rendered impossible due to limited LDOE auditing authority. LDOE efforts to support struggling students by supporting struggling schools would be thwarted by the artificial inflation of data intended to initiate such processes, including graduation rates. Instead of lowering requirements to demonstrate an expected level of mastery, students should receive just-in-time support enabling them to be successful in meeting rigorous academic expectations.

Inequities for English learners.

- LDOE agrees that the proposed policy does not address the needs of ELs. Rather, warning signs will be masked as they are given diplomas without earning passing grades in required courses, without learning the English language, and without objectively demonstrating proficiency on assessments. The ESEA aims to ensure that ELs, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English. The proposed policy may intend to eliminate barriers for some ELs, but it also incentivizes schools to abdicate their responsibility to assist students in overcoming those barriers by providing points to distribute diplomas to students who have not met the academic bar set for their peers.
- The proposed appeals process is a circumvention of attainable expectations for student achievement, with the required passing level on the test set two levels below proficiency. Also, for ELs, passing a course does not necessarily mean that students mastered course content. ELs can only be given failing grades in content courses with significant documentation of lack of effort. Otherwise, each F is changed to a D in the record. The argument that passing courses is a strong indicator of eligibility for graduation does not hold up for ELs. LDOE agrees that BESE should not take lightly this significant change to established minimum diploma standards.

Inequities for students earning a high school diploma via the traditional path.

- While commenters in support of the proposal expressed nebulous and often conflicting ideas regarding the meaning of and criteria for a diploma, it is the position of LDOE that a diploma serves as evidence of proficiency in subjects deemed essential for all students by the State of Louisiana.
- LDOE agrees that the minimum expectations for a high school diploma will not be consistent across all students as a result of the proposed policy. As mentioned above, students demonstrating proficiency through state assessments comply with stringent expectations regarding time and resources allowed, while no such expectations are guaranteed or enforceable for students completing portfolios. Lowering the bar for equally-capable students can communicate a message of discrimination, whereas supporting all students in achieving an equally-applied standard contributes to the development of a strong work ethic and ability to persevere through challenges.
- The proposal will also result in inequities among students receiving a diploma via the appeal process. The proposed solution differentiates between students entering a freshman cohort prior to 2022-2023 and during or after 2022-2023. While the transcript and employability requirements are listed as the same for both groups, the content proficiency requirement will be different. Candidates during or after 2022-2023 are expected to complete a portfolio in both subjects in the assessment pair for which a passing score was not achieved, and they must have their portfolios scored according to an "LDOE standardized rubric." However, candidates who entered a freshman cohort prior to 2022-2023 may satisfy the portfolio requirement by "completing a portfolio" aligned to one course in each lacking assessment pair. This discrepancy is twofold first, students who entered a freshman cohort prior to 2022-2023 will be required to complete only half of the work required of the students in later cohort years. Second, the policy language requires only that the work be completed not scored according to any set standard or even scored at all. For students in these earlier cohorts, the diploma could essentially be a participation diploma distributed in exchange for completion of anything labeled a portfolio.

Lack of transparency and research.

- LDOE agrees that more research and engagement should have been done prior to the approval and publication of the proposed policy. The initial LDOE recommendations included conducting further study in the issues surrounding the effective education of ELs. First, an analysis of progress rates across Louisiana systems should be conducted, as many ELs have failed to show any progress in attainment of English proficiency year over year. While acquiring a second language is difficult, it is disconcerting that a significant number of students make no progress at all after a year of instruction. Second, an analysis of instructional and programmatic best practices should be conducted to identify needed shifts in policy and guidance both statewide and locally. Differentiated language acquisition planning, instructional programs with high rates of effectiveness, and professional development to equip teachers are essential to strategically addressing the problem rather than merely reacting to the symptoms.
- Since the proposal extended the appeals eligibility to all students in Louisiana, further research should be conducted into the potential impact across schools, universities, and the business community prior to adoption. Examination beyond the surface-level data of states recently implementing appeals processes should be conducted to determine the actual impact on students after graduating without objectively demonstrating ability to meet minimum standards of proficiency.

Excessive breadth of applicability.

- LDOE agrees that the appeals policy as written is excessively broad, likely resulting in over application for students and lowering of standards, especially for minorities and ELs. Even with an auditing activation of three percent of a high school cohort, which equates to approximately 1,700 Louisiana students annually, far more students than that may be deemed eligible for a high school diploma through this alternate assessment. In contrast, the federal code provides for the administration of alternate assessments of standards-based achievement for students with the most significant cognitive disabilities, but only for one percent of the total number of all students in the state who are assessed in each subject⁸.
- Applicability of an alternative means of assessment has been a legal concern expressed by LDOE. In a letter to BESE, LDOE legal counsel explained, "Our state laws allow for alternatives for certain students with IEPs, but not for EL students or for any other students. Our state legislature could, but has not yet chosen to, create an alternative for EL students, as other states have done⁹." While R.S. 17:24.4 provides for an alternative means of being awarded a high school diploma for eligible students with disabilities, the proposed measure creates a similar pathway for students without disabilities, this time without legislative direction.

Issues with policy language.

LDOE agrees that multiple issues and ambiguities exist within the policy language.

- Requires the reporting of information that does not exist, cannot be requested, or may require revision to statute. 20 USC 3111, *et seq.* permits the determination of the number of immigrant children and youth in the state based only on data available from the American Community Survey conducted by the Department of Commerce, which may be multi-year estimates. Additionally, LDOE and the Louisiana Workforce Commission do not currently have the ability to share data as required by the proposed policy.
- Significantly restricts LDOE ability to audit implementation, especially for schools with an undefined unique population. An exemption from consecutive audits essentially allows any school that can argue its population is "unique" to exceed at will the three percent threshold as long as it is "in compliance with appeals eligibility requirements." In other words, in a school with an excessive number of students failing to demonstrate academic proficiency but attaining some form of limited workforce training, the three percent limit becomes merely a suggestion. The appalling possibility of schools with high rates of graduation but low rates of proficiency increases in likelihood. Further, ambiguity in language and in auditing authority may have

⁸ Public Law 114-95, Title II, § 2002, Dec. 10, 2015.

⁹ See also R.S. 17:24.4; R.S. 17:183.2

implications for students with exceptionalities, as LDOE will be restrained from fully determining whether such students have received a free and appropriate public education. LDOE will require at least one additional staff position to manage the monitoring and compliance audits associated with the proposed policy to avoid detracting from the essential work of monitoring for compliance with IDEA and other crucial programs.

- Possible conflict in authorizing authority. The proposed policy states, "If the initial audit yields discrepancies in the implementation of the appeals process, the State Superintendent of Education, may be the final authorizer for the respective school site the following year." This confusing language regarding the authorization of school sites could lead to conflicting interpretations regarding charter authorizing.
- Unclear reference to content proficiency.
- Ambiguity regarding mastery demonstration of employability skills, strength of industry-based credential attainment, and designation of qualifying credentials.
- Ambiguity regarding the retroactive nature of diploma issuance, including disproportionate treatment of students entering a freshman cohort before 2022-2023 and those entering during or after 2022-2023.
- Ambiguity regarding the required appropriate academic supports.
- Ambiguity regarding the scope of the required additional unfunded requirement of LDOE to develop a list of strategies and technical assistance for at-risk students. In the full fiscal and economic impact worksheet, the Legislative Fiscal Office (LFO) states, "LDE reports there is currently no funding source available to meet the requirements of the proposed rule change. LFO assumes an increase in SGF will be required." R.S. 49:961.E.(1) does not permit the adoption of any rule if the accompanying fiscal and economic impact statement approved by the legislative fiscal office indicates that the rule change would result in an increase in the expenditure of state funds unless the rule is adopted as an emergency rule pursuant to the requirement of R.S. 49:962 or unless the legislature has specifically appropriated the funds necessary for the expenditures associated with the rule change." The work mentioned here, as well as the additional auditing position required, would likely result in an increase in state general funds. In fact, as LDOE has continued to review the ramifications of the policy, the proposal could cost as much as \$500,000 over the next three years, including the additional staff member needed to manage the auditing process; the contractor identified through a Request for Proposal (RFP) process to build the rubrics, training materials, and review processes; and the additional contractor or staff member work needed for guidance development as well as the addition of technical assistance and resources regarding dropout prevention and mentoring services required by the proposed policy. This estimate does not include the local costs of educators absorbing the additional teacher workload instigated by the implementation of the proposal.
- Possible student safety issues regarding the provision of student information and the involvement of unauthorized adults for services that may not be available to underage students.
- Ambiguity in additional requirements that may be considered for student appeal.
- Ambiguity regarding requirements for an evaluation of student preparedness for postsecondary success.
- While local oversight is provided by having the district superintendent serve as the final authorizer, the ethical and political implications for system leaders as mentioned by oppositional commenters remain valid points of concern. Further, it remains unclear the level of engagement that will be required of a superintendent to evaluate, and approve in good conscience, that a student requesting appeal has independently demonstrated sufficient content proficiency to merit receipt of a high school diploma.
- While commenters argue that employability requirements in the policy are strong, they mostly reflect a bar at or below the minimum expectation for a student to graduate with a career diploma. The WorkKeys assessment assesses competencies in the areas of workplace documents, applied mathematics, and graphic literacy. More suited to a career diploma than a university diploma, the proposed policy allows a student to use the WorkKeys assessment to establish eligibility for either diploma type. Further, not all credentials measure literacy, and some are written to middle-grade reading levels. Very few credentials measure numeracy or application of math skills. While LDOE supports the attainment of high-quality industry-based credentials,

it cannot be stated with accuracy that the employability requirements in the policy ensure student readiness for upward mobility within an array of employment opportunities. Requirements for both the career diploma and the university diploma are explicitly delineated in statute, but the proposal would permit the distribution of either diploma in exchange for a potentially different set of achievements.

- Although commenters claimed that students are required to take each failed assessment twice, this language is not found within the policy as proposed noticed in the *Louisiana Register*.
- While commenters claimed that a three percent auditing threshold will ensure that only a small number of students benefit from the appeals process, this number still amounts to at least 1700 students annually who could receive a diploma without meeting the minimum level of academic proficiency required of other Louisiana graduates, notwithstanding the loophole to auditing threshold mentioned above.
- While commenters claimed thirty hours of required remediation in each failed subject as a policy strength, this requirement is already in place in BESE policy and would not be a new addition as a result of the proposal.
- While commenters claimed that the portfolio requires mastery in both subjects in each assessment pair, whether students actually attain mastery or actually complete the work independently is not verifiable within the appeals process as proposed.
- While commenters tout eligibility requirements as a strength of the policy, the reality remains that all students who participate in an appeals process will have failed to meet minimum expectations for academic proficiency in one or more courses deemed essential by BESE, the Louisiana legislature, and the LDOE.
- While commenters claim that portfolio scoring does not represent an ethical concern because the only special interest teachers have is that of their students, the situation actually creates, at the very least, an epistemic ethical dilemma for educators who must decide between a commitment to ensure that every student learns and a desire for students to have a diploma and graduation experience. An empathetic educator, when seeing the faces of real students in real-time hardships and ambitions, may struggle to uphold one definition of success in favor of another. For this reason, it is crucial that the state agency set clear boundaries and expectations to support educators in their capacity to empathize with and support students within the educational construct.

Negative implications for postsecondary education.

- LDOE agrees that postsecondary institutions will likely need to expand the availability of remediation coursework and staff equipped to provide such coursework.
- This coursework will be paid for through an increase in tuition costs to cover the additional support needed for these students, also requiring students who were given a diploma before meeting the standard to pay for remedial coursework.

LDOE's Recommendation

Therefore, LDOE recommends the Louisiana Board of Elementary and Secondary Education (BESE) abandon the rulemaking process for the present Notice of Intent (NOI).