



STATE BOARD of ELEMENTARY and SECONDARY EDUCATION

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Tavares A. Walker
Executive Director

Dr. Cade Brumley
State Superintendent

October 9, 2024

MEMORANDUM

TO: Senator Cameron Henry, Senate President
Representative Phillip DeVillier, Speaker of the House
Senator Rick Edmonds, Chair, Senate Committee on Education
Representative Laurie Schlegel, Chair, House Committee on Education

FROM: Tavares A. Walker, Executive Director
Board of Elementary and Secondary Education

RE: Summary Report on Board of Elementary and Secondary Education Proposed Rulemaking

Pursuant to R.S. 49:968(D)(1)(b), the Board of Elementary and Secondary Education hereby submits to you this summary report and announces its plan to proceed with rulemaking by finalizing the July 20, 2024, Notice of Intent that was promulgated on pages 1018-1028 of the *Louisiana Register*.

On August 8, 2024, the Board received two (2) written requests for a public hearing.

In response to these requests, a public hearing was conducted on August 26, 2024 pursuant to R.S. 49:953(A)(2)(a).

The Louisiana State Board of Elementary and Secondary Education met in regular session on October 9, 2024, and took the following action:

On motion of Mr. Appel, seconded by Dr. Armstrong, the Board:

1. received the SPCAR regarding revisions to Bulletin 111, *The Louisiana School, District, and State Accountability System*;
2. authorized the BESE staff to submit the summary report to the Legislative Oversight Committees; and
3. directed the BESE staff to proceed with the final adoption of the July 2024 Notice of Intent regarding revisions to Bulletin 111, *The Louisiana School, District, and State Accountability System*, with the submission of the final Rule at the appropriate time.

The Board has made no change to the proposed Rule.

Subject to legislative oversight by either the House Committee on Education or Senate Committee on Education, the Board will proceed with the adoption of the Notice of Intent as a final Rule in the November 20, 2024, issue of the *Louisiana Register*.

The following documents are attached:

1. A copy of the Notice of Intent;
2. Requests for public hearing;

3. Public comment cards from public hearing;
4. Unofficial minutes of the public hearing; and
5. LDOE Summary of Public Comments and Agency Response.

Please contact Erin LeBlanc at (225) 342-5841 if the Board may be of any assistance to you concerning this Rule.

TAW:ell

Attachments (5)

- c: Caroline Tyler, Secretary, Senate Committee on Education
- Elizabeth Borne, Legislative Analyst, House Committee on Education
- Lisa Lovello, Legislative Analyst, House Committee on Education
- Ashley Townsend, Policy Director, Louisiana Department of Education
- Tavares A. Walker, Executive Director, BESE
- Kevin Calbert, Communications Manager, BESE

ATTACHMENT #1

**FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES**

**RULE TITLE: Child Welfare Home Certification
Child Placing Agencies**

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

The proposed rule will increase cost within the Department of Children and Family Services (DCFS) by \$6,612,508 annually. The department proposes to adopt LAC 67: V, Subpart 8, Chapter 73, Child Placing Agencies, Section 7316 to allow DCFS, that receives Title IV-E funding, to claim federal reimbursement for an eligible child who is placed in a relative or kinship licensed or approved foster family home as the department no longer requires child placing agencies such as relative or kinship family homes to follow certain residential licensing standards, relating to income verification, criminal background checks, health statements, training, and transportation, pursuant to federal registry 88 FR 66700.

The maintenance payments to relative or kinship certified caregivers who are providing care for a child in foster care are estimated at \$6,612,508 (\$4,351,714 State General Funds and \$2,260,794 Federal Funds), annually. The number of children in care and the number of relative or kinship caregivers that are certified annually varies from year to year. This estimate is based on the average number of 954 children placed in non-certified homes over the past 3 years. An estimate of 482 out of 954 children will be eligible for Title IV-E reimbursement. The department did not receive a specific appropriation for these payments, and \$4.3 M SOP is needed for the maintenance of effort to support the federal draw of IV-E funds. The budgeted amount of funding for FY 25 is not sufficient to support the total estimated amount needed to support the cost annually; therefore, the agency will have to request supplemental funding. Additionally, there will be cost of publishing rulemaking which is estimated to be approximately \$852 (\$639 State General Funds and \$213 Federal Funds) in FY 24-25. This is a one-time cost that is routinely included in the department's annual operating budget.

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

The proposed rule will increase revenue by \$2.2 M annually. Due to the increased number of maintenance payments that DCFS will be providing to relative or kinship certified caregivers who are providing care for a child in foster care, the department will be eligible to receive federal IV-E funding in the estimated amount of \$2,260,794 annually (482 children x \$18.99 average daily board rate x 365 days x 67.67% Federal Match Rate). This funding will be used to provide maintenance payments to the applicable caregivers.

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

The relative or kinship certified caregivers will receive maintenance payments (daily rate) to assist in their care of the foster child while placed in their home.

**IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT
(Summary)**

There is no anticipated effect on competition and employment.

Toby Comeaux
Deputy Secretary
2407#049

Patrice Thomas
Deputy Fiscal Officer
Legislative Fiscal Office

NOTICE OF INTENT

Board of Elementary and Secondary Education

Bulletin 111—The Louisiana School, District, and State
Accountability System
School, District, and State Accountability
(LAC 28:X1.305, Chapter 17, Chapter 19,
Chapter 35, and 4003)

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:X1 in Bulletin 111—*The Louisiana School, District, and State Accountability System*. The proposed revisions amend and adopt a comprehensive update to Louisiana's current K-12 accountability system. The new accountability system is an effort to simplify accountability reporting, increase rigor and transparency, and is strongly influenced by the college and career readiness definition. The formula and calculations focus on indicators for student growth, academic proficiency, and acceleration for career, college, and service readiness.

Title 28

EDUCATION

**Part XI. Bulletin 111—The Louisiana School, District,
and State Accountability System**

Subpart 1. Accountability/Testing

Chapter 3. School Performance Score Component

§305. Transition from 2017-2018 to 2024-2025 SPS

Release

A. Beginning in the 2017-2018 school year (2018 SPS), the overall grading scale will be as follows:

Beginning in 2017-2018 (2018 SPS) and through 2024-2025 (2025 SPS)	
School Performance Score	Letter Grade
90.0-150.0	A
75.0-89.9	B
60.0-74.9	C
50.0-59.9	D
0-49.9	F

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 44:447 (March 2018), LR 48:997 (April 2022), LR 50:

**Chapter 17. The School and District Accountability
System**

**§1700. Transition to Revised Accountability System and
Calculation**

A. Beginning with the 2025-2026 school year (2026 SPS), the accountability system in this Chapter shall be used, and Chapters 3, 4, 5, 6, 7, and 8 of this Part shall cease to be effective.

1. The LDOE shall calculate a comparison score showing a school or district performance using the methodology in place in the prior year and shall make this information available on the department website.

B. Effective with the adoption of Chapters 17 and 19 of this Part and continuing until the release of the 2026 SPS, the LDOE shall, using already available data, simulate and make available to school systems annual results calculated for information purposes.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1701. School Grades and Indicators

A. The annual report shall identify schools as having earned one of the following grades:

1. A—produces excellent student achievement and progress.
2. B—produces above average student achievement and progress.
3. C—produces satisfactory student achievement and progress.
4. D—produces less than satisfactory student achievement and progress.
5. F—fails to produce adequate student achievement and progress.

B. Designation of School Grades. A school grade shall be calculated for each school that has students who are enrolled in the school for the full academic year and are in a tested subject or grade on the state annual accountability assessment.

1. Exception. A school shall not earn a school grade if the number of students meeting the full academic year definition is fewer than 15 to ensure accuracy and to prevent the unlawful release of personally identifiable student data in accordance with the Family Educational Rights and Privacy Act (FERPA).

2. A school shall test all students. Students who should otherwise be included in the assessment shall be entered as a 0 in the numerator and counted in the denominator.

3. Each school shall earn a school performance score under one site code regardless of the grade structure of the school.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1703. Indicators Contributing to School Grades

A. A school grade shall be based on a combination of indicators in accordance with this Chapter for the percentage of students:

1. scoring at proficient or higher on the state accountability assessment for all students in reading/ELA;
2. scoring at proficient or higher on the state accountability assessment for all students in mathematics;
3. scoring at proficient or higher on the state accountability assessment for all students in social studies;
4. scoring at proficient or higher on the state accountability assessment for all students in science;
5. making growth in reading/ELA in accordance with this Chapter;
6. making growth in mathematics in accordance with this Chapter;
7. making growth, for the lowest performing 25 percent of students, on the state annual accountability assessment in reading/ELA in accordance with this Chapter;

8. making growth, for the lowest performing 25 percent of students, on the state annual accountability assessment in mathematics in accordance with this Chapter;

9. who are English learners making progress or achieving proficiency on an English language acquisition assessment in accordance with this Part.

B. A school grade for high schools shall also be based on the percentage of cohort members:

1. earning a standard high school diploma in four years in accordance with §1709 of this Chapter;
2. scoring ready to meet post-secondary goals in accordance with §1711 of this Chapter;
3. scoring ready and earning a recognized credential of quality in accordance with §1713 of this Chapter.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1705. Aggregating Indicators to Determine School Grades

A. The LDOE shall assign school grades based on the indicators with available data at the school.

1. Each indicator carries equal weight in the overall calculation.

2. Schools will earn 0-100 points for each indicator where one point is awarded for each percentage of students.

3. Points are aggregated to determine the overall percentage of points earned.

B. School Grade Points. The LDOE shall set three scales for elementary, high school, and districts and shall issue cut scores for A, B, C, D, and F. The high school scale shall apply to any schools having a cohort graduation rate as an indicator. All other schools shall utilize the elementary school scale.

C. Initial Grading Scale. Upon release of the 2024 SPS, the LDOE shall set three scales for elementary, high school, and districts and shall issue cut scores for A, B, C, D, and F under the revised accountability formula using 2024 SPS data pursuant to Chapter 3 of this Part. Such cut scores shall be used in transitional results issued in 2024 and 2025 and shall remain in effect for the 2026 SPS calculation. The initial scale shall be set utilizing simulation of available data from the 2024 SPS such that the initial percentages of school grades earned are no more than:

1. 10 percent—A;
2. 20 percent—B;
3. 40 percent—C;
4. 20 percent—D; and
5. 10 percent—F.

D. Automatic Grading Scale Increase. In any year in which 50 percent or more of schools or districts on a scale earn a grade of A or B, the scale required to earn a school grade shall be raised by five percent for the following year. Such increases shall continue until the scale reaches:

1. 90 – 100 = A;
2. 80 – 89 = B;
3. 70 – 79 = C;
4. 60 – 69 = D; and
5. 0 – 59 = F.

E. School Recognition. The LDOE shall develop school awards for schools that improve at least one school grade level or earn a school grade of A.

1. The Value Added Growth Award recognizes schools in the 90th percentile for growth in reading/ELA, mathematics, science, or social studies.

2. The LDOE shall also provide for a Top Gains/Growth Award that recognizes schools with exceptional growth.

F. District Grades. The annual report shall include a district grade calculated using the student population of the district, which follows the same method used for calculating a school grade.

G. Incentive Points. A school that establishes, maintains, or expands a foreign language immersion program or proceeds to earn or maintain certification of a foreign language immersion program in accordance with R.S. 17:273.2 shall have one point added to the final calculation, which would be the equivalent of one point in each of the school indices.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1707. Student Growth Methodology

A. The growth score for each subject shall include all students enrolled in the school for the current full academic year with scores on the annual state accountability assessment in the current and prior years for a subject.

B. A school earns credit for growth in a subject for each student who, on the annual state accountability assessment:

1. increases at least one achievement level in the subject;

2. scored below the mastery achievement level in the subject for the prior year and advances from a subcategory within basic, approaching basic, or unsatisfactory achievement levels to a higher level in the current year. The subcategory is determined by dividing the scale of each achievement level into two equal parts;

3. for a given subject area, scored at the mastery achievement level in both the prior year and the current year and earns a scaled score greater in the current year than in the prior year;

4. scores at the advanced achievement level in the current year.

C. For reading/ELA and mathematics, students measured as scoring in the lowest-performing 25 percent based on prior year scores on the annual state accountability assessment and with full year enrollment in the school for the current academic year shall comprise the additional reading/ELA and mathematics growth groups.

D. For students taking a first LEAP 2025 assessment in high school in a subject area, the eighth grade assessment taken in the same subject will be used as the prior-year assessment for determining growth. For each year since the prior assessment, the student shall grow by one achievement subcategory in the current year. If the student scored at mastery in eighth grade, the student must improve one scale point per year since the prior test. The high school assessment need not be taken in the school year directly following the examination counted as the prior-year assessment.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1709. Cohort Graduation Rate Methodology

A. A cohort of students is all students who entered ninth grade for the first time in the state of Louisiana in a given academic year.

B. Each cohort of students is tracked for four years, from entry as first-time ninth graders through four academic years. Transitional ninth grade students will automatically enter the first-time ninth grade cohort in the academic year following enrollment in transitional ninth grade.

C. Students who exit the Louisiana student information system (SIS) in fewer than four years for legitimate reasons shall not be included in the cohort graduation rate calculation.

1. Students shall only be considered legitimate leavers from a cohort under the following circumstances:

a. transfer from Louisiana K-12 public education to another diploma-awarding school or program;

b. emigration to another country; or

c. death.

2. Specific documentation is required for students to be considered legitimate leavers as follows:

a. Transfer out of state or country shall require a request for records from the receiving out-of-state school, a statement written and signed by the parent/guardian, or proof of enrollment as a foreign exchange student.

b. Transfer to an approved nonpublic school which awards high school diplomas shall require a request for records from the receiving nonpublic school or a statement written and signed by the parent/guardian.

c. Transfer to an early college admissions program in accordance with LAC 28:LCXV.2329 shall require submission of a school withdrawal form, request for records from the college or university, and verification of full-time enrollment in an academic program.

d. The only acceptable documentation for transfers to out-of-state or approved nonpublic diploma-awarding schools is a request from the qualifying school or program, a letter from an official in the receiving school or program verifying student enrollment, or a note written and signed by the parent/guardian including a reason for exit that confirms the exit type used to remove the student from enrollment.

e. Documentation for a student transfer to home school is an official approval document from LDOE dated before October 1 following the student exit from the Louisiana SIS except where the student is not yet in the final school year of the cohort for on-time graduation.

f. In the final year of the cohort for on-time graduation, documentation for a student transfer to home school is an official approval document from LDOE dated before October 1 of the beginning of the school year in which the cohort is scheduled to graduate.

g. Emigration to another country must be documented with a statement signed by a parent/guardian, a request for student records, or an approved application for participation in a foreign exchange program which verifies dates of enrollment.

h. Sufficient documentation for a deceased student is an obituary or letter from the parent/guardian.

3. The LDOE shall maintain and post on the department website a list of schools that are considered non-diploma awarding.

4. A school is classified as non-diploma awarding when the school:

a. awards fewer than five regular diplomas per academic year for two consecutive years; or

b. enrolls fewer than ten twelfth grade students for a full academic year for two consecutive years.

c. The LDOE may grant exceptions to this requirement for new schools and schools with small populations upon district request when the department has determined that no circumvention of accountability consequences will occur. The district is responsible for providing any data requested by the LDOE.

D. A student exited from a school or LEA using a code other than legitimate leaver codes or those codes indicating completion of a high school course of study must subsequently appear in the Louisiana SIS or the student shall be considered a dropout from the state, LEA, and school.

E. Students with no high school records in the Louisiana SIS who transfer from a home school, nonpublic school, or another state into a Louisiana school on or before October 1 of the eleventh grade year will enter the on-time cohort at the assigned grade level of the student. Students with existing Louisiana public high school records will re-enter the original cohort.

F. Students transferring within the Louisiana public school system will remain in the same cohort.

1. Students transferring within an LEA on or before October 1 of the cohort fourth year will be included in the calculation of the graduation indicator at the school into which the student transferred and completed the fourth year of high school.

2. Students who exit a high school for more than 45 calendar days during the fourth year shall not be included in the high school graduation cohort calculation for that school.

G. Students who graduate or complete high school in fewer than four years will be included in the cohort in which the student entered ninth grade.

H. A student who exits K-12 education to enter a school or program that does not award a state-recognized high school diploma shall be considered a dropout in graduation cohort calculations.

I. For students who exit and have no subsequent enrollment in a school, the school of last record will be the school that sent a valid request for student records to the school that applied the exit code.

1. If the last exit from enrollment is for expulsion, exit code 01, the request for records will not be used to determine the last school of record. The last school of enrollment shall be used.

J. All students, excluding those defined as legitimate leavers in Subsection C of this Section, regardless of entry or exit dates, are included in the state-level cohort.

K. A student assessed using the LEAP Connect shall be included in the graduation rate calculation for the year in which the student graduates or the year in which the student exits after at least four years in high school with no subsequent re-enrollment by October 1 of the following academic year. A student who is not exited will be counted in the year that the student reaches the age of twenty-two.

L. Record Maintenance. Schools shall maintain documentation that supports exit codes for at least four years after the data has been used in school performance scores.

1. Schools without sufficient documentation to support exit codes are subject to action by LDOE in accordance with Chapter 41 of this Part.

2. The authenticity of exit code documentation is determined by the LDOE.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1711. Nationally Recognized Assessment Indicator

A. The nationally recognized assessment indicator is determined by the percent of cohort members meeting the ready benchmark.

B. Students earn one or more of the following:

1. ACT composite score consistent with the TOPS ACT requirement in R.S. 17:5024, but not lower than a score of 20; or

2. Classical Learning Test score of 67 or higher; or

3. SAT score of 1040 or higher; or

4. WorkKeys score of Gold; or

5. ASVAB AFQT of 59 or higher.

C. For a student on the university diploma pathway to earn credit in accordance with Subsection B of this Section, the student shall have taken the ACT, SAT, or CLT.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1713. Acceleration Indicator

A. Louisiana acknowledges multiple pathways to demonstrate college, career, or service readiness. The acceleration indicator shall be the percentage of cohort members determined to be college and career ready and having earned a credential in accordance with this Chapter.

B. The acceleration indicator is determined by the percent of students meeting the requirements of this Section.

C. The denominator for the acceleration indicator shall be the same as the graduation cohort in accordance with §1709 of this Chapter.

D. Quality of college readiness is demonstrated by earning a college-ready score in accordance with §1711 of this Chapter and minimum score requirements as follows:

1. minimum of six college credits with a grade of C or better in one or more academic dual enrollment courses;

2. score of 3 or higher on an AP exam;

3. score of 4 or more on the IB exam;

4. ACT mathematics sub-score of 25 or higher or SAT mathematics sub-score of 590 or higher;

5. ACT English sub-score of 26 or higher or SAT Writing and Language score of 33 or higher; or

6. Three CLEP exams with course enrollment and a minimum score recognized by the Louisiana Board of Regents flagship university for college credit.

E. Quality of career readiness shall be demonstrated by completion of one or more of the following:

1. two years of fully aligned Fast Forward registered apprenticeship; or

2. industry based credential (IBC) or bundle of credentials determined to be of high value by the Louisiana

Workforce Commission in addition to completion of a work-based learning experience in accordance with LAC 28:CXV.3113; or

3. certificate of technical studies in a high wage, high demand industry.

F. For any school in which 25 percent of the students earning acceleration credit through the provisions of Subsection E of this Section complete a work-based learning experience, the school shall earn a base of five percent to be added to the acceleration indicator.

1. In each year after the 2026 SPS, the percentage of such students expected to complete a work-based learning experience shall increase by five percent until the requirement equals 65 percent of career acceleration students.

2. A score of no more than 100 may be earned for the indicator.

3. Students satisfying the career acceleration requirement through a certificate of technical studies or a registered apprenticeship shall be considered to have completed a work-based learning experience.

G. Readiness for military service shall be demonstrated by one or more of the following:

1. a signed letter of commitment to military service; or

2. acceptance to a military service academy.

H. Pursuant to federal ESSA regulations, HiSET may not be included in the adjusted cohort graduation rate. The LDOE shall engage with the Louisiana Workforce Commission and Louisiana Community and Technical College System to identify appropriate basic IBC bundles to recognize within the acceleration indicator for students earning a HiSET.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1715. Report Card

A. The state report card shall provide information to assist schools, school systems, and the public to focus resources and support to increase student achievement.

B. The LDOE shall annually publish, on the department website, a report of the statewide accountability program and student achievement in the state, districts, and public schools.

C. Report cards shall include, without limitation, the following information:

1. state, school, and district grade;

2. scores and an explanation of performance under each indicator in the formula;

3. value-added score;

4. descriptions of performance of all schools participating in the assessment program and all major student populations as determined by LDOE; and

5. information regarding school improvement.

D. The provisions of FERPA, 20 U.S.C.S 1232g, and Louisiana statutes pertaining to student records shall be applicable.

E. The school/district shall provide the school report card to each parent/guardian no later than one month after its release each school year.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

Chapter 19. Inclusion in Accountability

§1901. State Assessments and Accountability

A. Schools shall have a minimum of fifteen full academic year students in one of the indices in accordance with Chapter 17 of this Part in order to receive a score.

B. Any indicator with fewer than fifteen students shall not contribute to a school or district score.

C. Louisiana students in third through eighth grade shall participate in at least one of the following state assessments on an annual basis:

1. LEAP; or

2. LEAP Connect.

D. Louisiana students in ninth through twelfth grades will participate in at least one of the following state assessments:

1. high school LEAP 2025, when the student is enrolled in the course for which a test is available;

2. LEAP Connect alternate assessment; or

3. ACT in eleventh or twelfth grade.

E. All students who are English learners shall annually take the Louisiana English Language Proficiency Test (ELPT) assessment or the ELPT Connect in addition to the associated state assessment for the grade in which the student is enrolled.

F. High school LEAP 2025 scores for repeaters in any subject shall not be included in high school SPS calculations except for middle school students who earn a score of unsatisfactory, approaching basic, or basic and retake the high school LEAP 2025 test.

G. Scores earned during an academic year by a student who transferred into the LEA after October 1 of the same academic year shall not be included in the SPS or subgroup performance score.

H. An ACT score of a twelfth grade student will count in only one accountability cycle.

I. A student completing the third year in a high school cohort must have taken the Algebra I, English I, biology, and civics assessments or LEAP Connect. A student not meeting this requirement will be assigned a score of zero and be counted as a non-participant in high school testing. All students must be included in the assessment cohort regardless of course enrollment, grade assignment, or program assignment.

J. English learners shall participate in all required academic assessments and the ELPT or, for qualifying students, ELPT Connect.

1. In the first year, academic assessment and ELPT scores will not be included in school performance score calculation as indicated by the application of an assigned accountability code and verification of first-year enrollment.

2. In the second year, ELA/reading and mathematics assessment scores will be included in the growth indicator only, and ELPT improvement will be included in the English learner indicator in accordance with §4003 of this Part.

3. In the third year, academic assessment will be included in both the proficiency and growth indicators, and ELPT improvement will be included in the English learner indicator for school performance score calculations.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1903. Inclusion of Students

A. The test score of every student enrolled in any school in an LEA on October 1 of the academic year and who is eligible to take a test at a given school within the same LEA shall be included in the LEA district performance score (DPS).

B. The score of every student counted in the DPS will also be counted for SPS and subgroup performance at the school where the student was enrolled on February 1.

C. The score of high school LEAP 2025 tests taken in December will count in the SPS at the school where the student is enrolled for the test.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1905. Inclusion of Students in Subgroup Performance

A. Students that meet the full academic year criteria, in accordance with this Section and §1903 of this Part shall be included in all subgroup performance score calculations.

1. A student that is a former English learner student for up to two years after no longer being considered an English language learner under state rules will not count toward the minimum n size for the EL subgroup.

2. A student that was previously identified as having a disability, but has exited IEP status within the past two years, will not count toward the minimum n size for the students with disabilities subgroup.

3. The LDOE shall, as appropriate, identify additional student subgroups for which to publish data regarding student performance beyond subgroups required by federal law, including, but not limited to, Section 504 students.

B. Calculating the school performance score shall be determined as follows:

1. The alternate academic achievement standards for students participating in LEAP Connect will be used, provided that the percentage of students assessed using the LEAP Connect at the district level does not exceed 1.0 percent of all students in the grades assessed.

2. If the district exceeds the 1.0 percent cap, the district shall request a waiver. The students exceeding the cap shall be assigned a 0 on the assessment and be considered non-proficient if the district fails to request the waiver or if the requested waiver is denied due to the LDOE determination that ineligible students were administered LEAP Connect.

3. When calculating the 1.0 percent cap for alternate assessment purposes, all decimals in results shall be rounded to the next highest whole number.

C. Students participating in LEAP Connect shall be included in the students with disabilities subgroup.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§1907. Pairing/Sharing of Schools with Insufficient Test Data

A. A school with at least one testing grade, considered as third through eleventh grades, will receive an SPS based only on its own student data provided that the school meets the requirements of LAC 28:XL1901.

B. Any school which includes kindergarten through second grades and does not have sufficient data to receive a reading/ELA, mathematics, science, and social studies indicator shall be paired with the school to which the majority of the second grade students will be enrolled for third grade for the purposes of receiving the school third grade assessment results for contribution to the reading/ELA, mathematics, science, and social studies indicators.

C. A school enrolling only twelfth grade students will be awarded an SPS based on shared data from a school or schools containing ninth through eleventh grades from which the majority of students are enrolled. The sharing calculation shall define the cohort that will provide the starting roster on which the graduation indicator will be based.

D. A district must identify the school where each of the non-standard schools shall be paired in order to facilitate proper sharing of data for reporting purposes in accordance with this Section. The paired school must be the school that receives by promotion the largest percentage of students from the non-standard school. If two schools receive an identical percentage of students from the non-standard school, or when there is no distinct feeder pattern, the district shall select the paired school.

E. If a school has too few test units to be a stand-alone school, the school may request to be considered stand-alone. The request shall be in writing to the LDOE from the LEA superintendent.

1. The school shall receive an SPS that is calculated solely on that school's data, despite the small number of test units.

2. The school forfeits the right to appeal an SPS and status based on minimum test unit counts.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, R.S. 17:6.1, and R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

Chapter 35. Inclusion of Alternative Education Schools and Students in Accountability

§3501. Alternative Education

[Formerly LAC 28:LXXXIII.3501]

A. - C.3. ...

D. Final accountability results shall be issued by the fall semester of each year and all accountability reports will reflect the configuration of the alternative school as it existed the prior spring semester.

E. A combination alternative school is a school with a grade configuration that includes a combination from both categories of schools, K-8 and 9-12, and as such will receive a score from a weighted average of the SPS from the K-8 grades and the SPS from the 9-12 grades.

1. The K-8 SPS will be weighted by the number of students eligible to test during the spring test administration.

2. The 9-12 SPS will be weighted by the sum of assessment units from students who are initial testers for high school LEAP 2025 plus the students eligible to take the ACT. Students with high school LEAP 2025 and ACT will count only one time.

F. For alternative schools with configurations that include ninth through eleventh grades, but do not have a twelfth grade, the school performance score will consist of the indices available.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6, 17:10.1, 17:416, and 17:416.2.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 39:472 (March 2013), amended LR 45:396 (March 2019), LR 50:

§3502. Transition from 2017-2018 to 2024-2025 SPS

A. Beginning in the 2017-2018 school year (2018 SPS), the overall grading scale will be adjusted to allow schools time to respond to higher expectations in each index. In 2018, the minimum score required for an A, B, and C school letter grade will be lowered by 10 points as compared to the 2012-13 baseline grading scale. In 2024, the scales will partially increase by five points each.

B. By 2025 the scale will return to the 2013 baseline ranges as detailed below:

1. For the 2023-2024 school year (2024 SPS), the SPS and letter grade will be:

- a. 95.0-150 = A;
- b. 80.0-94.9 = B;
- c. 65.0-79.9 = C;
- d. 50.0-64.9 = D; and
- e. 0-49.9 = F

2. For the 2024-2025 school year (2025 SPS) and beyond, the SPS and letter grade will be:

- a. 100-150 = A;
- b. 85.0-99.9 = B;
- c. 70.0-84.9 = C;
- d. 50.0-69.9 = D; and
- e. 0-49.9 = F

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§3503. Alternative Schools Including Alternative Charter Schools

[Formerly LAC 28:LXXXIII.3503]

A. - D.2. ...

3. - 8.e. ...

9. Repealed.

E. Beginning in the 2017-2018 school year (2016-2017 cohort), points shall be assigned for each member of a cohort according to the student results. To earn points for an AP/IB course, students must take the AP/IB exam and pass the course.

1. 160 points will be earned for a student earning a high school diploma plus either an associate's degree or both a. and b. in Paragraph 2 of this Subsection.

2. 150 points will be earned for a student earning a high school diploma plus one of the following:

a. AP score of 3 or higher, IB score of 4 or higher, or CLEP score of 50 or higher; or

b. Advanced statewide Jump Start credential.

3. 115 points will be earned for a student earning a high school diploma and both a. and b. in Paragraph 4 of this Subsection.

4. 110 points will be earned for a student earning a high school diploma plus one of the following:

a. At least one passing course grade for TOPS core curriculum credit earned as AP, college credit, dual enrollment, or IB; or

b. Basic statewide Jump Start credential.

5. 100 points will be earned for a student earning a high school diploma, including a student earning a career diploma with a regional Jump Start credential.

6. 40 points will be earned for a student earning a HiSET plus a Jump Start credential.

7. 25 points will be earned for a student earning a HiSET.

8. 0 points will be earned for a non-graduate without a HiSET.

F. Carnegie units earned in summer school after transitional ninth or traditional ninth grade will not be included.

G. Students who are considered dropouts in transitional ninth or traditional ninth grade based on SIS records shall be included in the calculation and earn zero points.

H. Students who are completing their third year in eighth grade shall be included in the calculation and earn zero points.

I. For students pursuing a Jump Start diploma pathway and participating in LEAP Connect, applied courses and course experiences shall count as a unit.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 29:2753 (December 2003), amended 31:423 (February 2005), LR 34:868 (May 2008), LR 35:1472 (August 2009), LR 37:2119 (July 2011), LR 37:3202 (November 2011), LR 38:1213 (May 2012), LR 39:472 (March 2013), LR 40:2240 (November 2014), LR 45:396 (March 2019), LR 47:449 (April 2021), LR 49:242 (February 2023), LR 50:

§3509. Calculating an Elementary/Middle School Progress Index

A. Beginning in the 2017-2018 school year (2018 SPS), the progress index will be calculated for ELA and math LEAP 2025 assessments as follows.

B. For students scoring unsatisfactory, approaching basic, or basic in the prior school year, the progress index will award 150 points for each ELA and math score meeting or exceeding the growth to mastery target set by the LDOE.

1. The growth to mastery target will be calculated by adding to the prior year scaled score the difference between the eighth grade scaled score required for mastery (750) and the prior year assessment scaled score divided by the number of years for the student to reach eighth grade, prior-year grade 8. For students with prior-year grade 7, the growth to mastery target is a score of mastery.

2. Growth to mastery targets will be rounded to the nearest whole number but must be at least one point above the prior year scaled score.

C. For students scoring mastery on the prior year assessment, the progress index will award 150 points for meeting or exceeding the continued growth target.

1. The continued growth target will be calculated by adding to the prior-year scaled score the difference between the eighth grade scaled score required for advanced, 794 in ELA and 801 in math, and the prior-year assessment scaled score divided by the number of years for the student to reach eighth grade, prior-year grade 8. For students with prior-year grade 7, the continued growth target is a score of advanced.

2. Continued growth targets will be rounded to the nearest whole number but must be at least one point above the prior year scaled score.

3. If the continued growth target as calculated above exceeds the minimum score for advanced in the current year, the target is advanced.

D. A score of advanced in the current year will be awarded 150 points in the progress index.

E. If a student does not earn 150 points in Subsections A.-D. of this Section, the value-added model will be used to measure individual student performance relative to similar peers.

1. For the purpose of school performance score calculations, the value-added model uses student characteristics including but not limited to prior academic achievement up to three years, special education exceptionality, economically disadvantaged status, English learner status, gifted status, Section 504 status, suspensions, mobility, and absences to calculate typical outcomes for comparable students in ELA and math based on a longitudinal dataset from all students who took Louisiana state assessments in third through twelfth grades. Based on typical outcomes for comparable students, each student is assigned an expected score.

2. The difference between each student's actual achievement score and that student's expected score is the growth result. If actual achievement for a student was higher than expected achievement for that student with that history, then the result would be positive. In contrast, if the actual score was less than the expected score, the growth result would be negative.

3. Each student growth result will be compared to all other student growth results in the same subject area in ELA or math and percentile ranked from the 1st to 99th percentile.

4. Value-added model points will be awarded for student growth percentiles as follows.

- a. 80-99th percentile—150 points;
- b. 60-79th percentile—115 points;
- c. 40-59th percentile—85 points;
- d. 20-39th percentile—25 points; and
- e. 1-19th percentile—0 points.

5. Students scoring mastery in the current year shall be awarded up to 150 points, but no fewer than 85 points in the progress index, including students who score in the 1st to 39th percentiles of VAM.

F. The progress index calculation will include all students who meet the inclusion requirements outlined in Chapter 19 and who have eligible LEAP 2025 assessment results in both the current and prior school year for the same content area. Student scores will be excluded from the progress index if any of the following are true:

1. student did not take the ELA or math assessment, or assessment result was voided in current or prior year;

2. student has more than one missing prior year score in the available subject tests;

3. assessment results for current or prior school year are in multiple grade levels in the same year;

4. current or prior year assessment results could not be matched to a valid student enrollment record needed for student characteristics used in the model;

5. assessment results for current and prior year are not sequential. Assessment results that are for 3rd grade tests in both the current and prior year are excluded;

6. insufficient numbers of comparable students for valid calculations within the value-added model.

G. The progress index will combine the results of two school years.

1. If only one year of data is available for a school, the progress index will be calculated based on one year only.

2. All students who meet the inclusion rules at a school for each individual school year will be included in the combined calculation.

H. If the high school LEAP 2025 result earned by students at a middle school is transferred, or banked, to the high school, the progress index result for the relevant assessment will also be transferred.

I. When considering prior academic achievement up to three years in the value-added model, the three most recently available years may be considered in instances where assessments were not administered statewide for a given school year.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§3511. Calculating a High School Progress Index

A. Beginning in the 2017-2018 school year (2018 SPS), the progress index will be calculated for Algebra I, geometry, English I, and English II assessments as follows.

B. Progress is measured between a student's eighth grade ELA and math assessments and the LEAP 2025 ELA and math assessments for Algebra I, geometry, English I, and English II.

1. If a student took only the high school LEAP 2025 assessment in middle school, the middle school progress index results will carry forward to the high school.

2. Retests will not be counted in the progress index.

C. For students scoring unsatisfactory, approaching basic, or basic on the baseline assessment, the progress index will award 150 points for each English and math score meeting or exceeding the growth to mastery target.

1. The growth to mastery target for students taking their first high school LEAP 2025 assessment in a content area will be calculated by adding to the baseline scaled score the difference between the scaled score required for mastery (750) and the baseline scaled score divided by two. The growth to mastery target for students taking their second high school LEAP 2025 in a content area will be mastery (750).

2. Growth to mastery targets will be rounded to the nearest whole number but must be at least one point above the baseline scaled score.

D. For students scoring mastery on the baseline assessment, the progress index will award 150 points for meeting or exceeding the "continued growth" target.

1. The continued growth target will be calculated by adding to the baseline scaled score the difference between the English II and geometry scores required for advanced and the prior year assessment scaled score divided by two. For students taking their second high school LEAP 2025 in a content area, the continued growth target is a score of advanced.

2. Continued growth targets will be rounded to the nearest whole number but must be at least one point about the baseline scaled score.

3. If the continued growth target as calculated above exceeds the minimum score for advanced in the current assessment, the target is advanced.

E. A score of advanced in the current year will be awarded 150 points in the progress index.

F. If a student does not earn 150 points in Subsections A.-E. of this Section, the value-added model will be used to measure individual student performance relative to similar peers.

1. For the purpose of alternative school performance score calculations, the value-added model uses student characteristics including but not limited to prior academic achievement up to three years, special education exceptionality, economically disadvantaged status, English learner status, gifted status, Section 504 status, suspensions, mobility, and absences to estimate typical outcomes for comparable students in ELA and math based on a longitudinal dataset from all students who took Louisiana state assessments in third through twelfth grades. Based on typical outcomes for comparable students, each student is assigned an expected score.

2. The difference between each student's actual achievement and that student's expected score is the growth result. If actual achievement for a student was higher than expected achievement for that student with that history, then the result would be positive. In contrast, if the actual score was less than the expected score, the growth result would be negative.

3. Each student growth result will be compared to all other student residuals in the same subject area of ELA or math and percentile ranked from the 1st to 99th percentile.

4. Value-added model points will be awarded for student growth percentiles as follows.

- a. 80-99th percentile—150 points;
- b. 60-79th percentile—115 points;
- c. 40-59th percentile—85 points;
- d. 20-39th percentile—25 points; and
- e. 1-19th percentile—0 points.

5. Students scoring mastery in the current year shall be awarded up to 150 points, but no fewer than 85 points in the progress index, including students who score in the 1st to 39th percentiles of VAM.

G. The progress index calculation will include all students who meet the inclusion requirements outlined in Chapter 19 and have eligible LEAP 2025 assessment results in both the current and prior school year for the same content area. Student scores will be excluded from the progress index if any of the following are true:

1. student did not take the ELA or math assessment or assessment result was voided in current or prior year;

2. student has more than one missing prior year score in the available subject tests. The value-added model uses tests in all contents available to analyze any given content;

3. assessment results for current or prior school year are in multiple grade levels in the same year;

4. current or prior year assessment results could not be matched to a valid student enrollment record needed for student characteristics used in the model;

5. insufficient numbers of comparable students for valid calculations within the value-added model; and

6. student is dually enrolled in Algebra I and geometry courses (applies to geometry only).

H. The progress index will combine the results of two school years.

1. If only one year of data is available for a school, the progress index will be calculated based on one year only.

2. All students who meet the inclusion rules at an alternative school for each individual school year will be included in the combined calculation.

I. When considering prior academic achievement up to three years in the value-added models, the three most recently available years may be considered in instances where assessments were not administered statewide for a given school year.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§3513. Interests and Opportunities Index Components

A. Beginning with the 2022-2023 school year (2023 SPS), alternative K-8 schools and high schools will select from a list of approved domains and associated interests and opportunities indicators that will serve as the basis for the interests and opportunities index calculation.

B. *Domains* are defined as a broad group of offerings related to student interests. Beginning with the 2022-2023 school year (2023 SPS), the following domains shall be applicable to the interests and opportunities index calculation:

1. the arts;
2. extracurricular activities;
3. STEM (science, technology, engineering, and math); and
4. world languages.

C. *Interests and Opportunities Indicators* are defined as specific measures that capture the extent to which a school is advancing student interests and opportunities. For purposes of the interests and opportunities index, alternative K-8 schools and high schools shall select four total indicators. These indicators shall be associated with at least two different domains.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

§3515. Calculating a Course Enrollment Score

A. The course enrollment component will be calculated for an alternative school enrolling students in grades K-8 based on course enrollment as reported to the LDOE.

B. The course enrollment score is defined as the percent of kindergarten through eighth grade students enrolled in

physical education courses, visual arts courses, performing arts courses, and of fourth through eighth grade students enrolled in world language courses.

C. The LDOE will publish a list of course codes for each category.

D. To calculate the numerator, sum the following based on student enrollment as of October 1:

1. total K-8 students enrolled in physical education and/or health courses;
2. total K-8 students enrolled in visual arts courses;
3. total K-8 students enrolled in performing arts courses; and
4. total K-8 students enrolled in world language courses.

E. To calculate the denominator, sum the following:

1. total K-8 students enrolled as of October 1, multiplied by 3; and
2. total 4-8 students enrolled as of October 1.

F. Divide the numerator by the denominator and multiply the result by 75. The final score cannot exceed 150.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 50:

Chapter 40. English Proficiency for English Learners
§4003. English Language Proficiency Progress

A. For measuring progress on the ELPT assessment, the overall proficiency scores will be organized into the following levels:

1. emerging—all domain scores are one or two;
2. progressing 1—at least one domain score of three and the lowest domain score is one;
3. progressing 2—at least one domain score of three and the lowest domain score is two;
4. progressing 3—at least one domain score of three and the lowest domain score is three; and
5. transitioning—all domain scores are four or five.

B. Each English learner expected trajectory to proficiency will be determined as follows.

1. The initial proficiency level for each English learner will be determined based on the ELPT or ELPT Connect assessment results from the school year in which the student was first enrolled in a Louisiana public school and participated in the ELPT assessment.

2. If a student exits the United States for one or more school years following the initial ELPT or ELPT Connect assessment and later reenrolls in Louisiana, the student will be considered a new student for the purpose of determining the initial proficiency level.

3. For students first identified in prekindergarten through fifth grade, use the initial ELPT or ELPT Connect proficiency level and number of years identified as defined in the table below.

Trajectory to English Language Proficiency: Students First Identified in Grades PK-5				
Initial ELPT or ELPT Connect Proficiency Level	Year 2	Year 3	Year 4	Year 5 and Beyond
Emerging (E)	P1	P2	P3	T
Progressing 1 (P1)	P2	P3	T	T
Progressing 2 (P2)	P3	T	T	T
Progressing 3 (P3)	T	T	T	T
Transitioning (T)	N/A	N/A	N/A	N/A

4. For students first identified in sixth through twelfth grade, use the initial ELPT proficiency level and number of years identified as defined in the following table.

Trajectory to English Language Proficiency: Students First Identified in Grades 6-12						
Initial ELPT or ELPT Connect Proficiency Level	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7 and Beyond
Emerging (E)	P1	P2	P2	P3	P3	T
Progressing 1 (P1)	P2	P2	P3	P3	T	T
Progressing 2 (P2)	P2	P3	P3	T	T	T
Progressing 3 (P3)	P3	T	T	T	T	T
Transitioning (T)	N/A	N/A	N/A	N/A	N/A	N/A

5. An ELPT or ELPT Connect overall proficiency score exceeds the trajectory if the score is at least one level higher than expected and meets the trajectory if the score is the same level as expected based on the tables above.

C. For measuring progress on the ELPT Connect assessment, the overall proficiency scores will be organized into the following levels:

1. emerging—all domain scores are one or two;
2. progressing 1—at least one domain score of three and the lowest domain score is one;
3. progressing 2—at least one domain score of three and the lowest domain score is two;
4. progressing 3—at least three domain scores of three and the lowest domain score is two; and
5. transitioning—all domain scores are three or four.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:10.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 30:767 (April 2004), amended LR 36:2244 (October 2010), LR 44:461 (March 2018), LR 50:

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? No.

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 2014 Regular Legislative Session. In particular, there should be no known or foreseeable effect on:

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

2. the total direct and indirect effect on the cost to the providers to provide the same level of service; or

3. the overall effect on 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, 2024, to Kimberly Tripeaux, Interim 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.

Kimberly Tripeaux
Interim Executive Director

FISCAL AND ECONOMIC IMPACT STATEMENT FOR ADMINISTRATIVE RULES

RULE TITLE: **Bulletin 111—The Louisiana School, District, and State Accountability System School, District, and State Accountability**

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

There are no anticipated implementation costs or savings to state or local governmental units due to the proposed rule change. The proposed change updates LAC 28:XI in Bulletin 111—*The Louisiana School, District, and State Accountability System*. The revisions amend and adopt a comprehensive update to Louisiana's current K-12 school and district accountability system. The new accountability system is an effort to simplify accountability reporting, increase rigor and transparency, and is strongly influenced by the college and career readiness definition. The formula and calculations focus on indicators for student growth, academic proficiency, and acceleration for career, college, and service readiness. The proposed rule change will not require any change to the data currently collected by the department, but rather adjusts the calculation methodology. As a result, there are no anticipated costs to the department or local education agencies to implement the proposed rule change.

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

There is no anticipated effect on the revenue collections of state or local governmental units as a result of the proposed rule change.

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

There are no anticipated costs or benefits to directly affected persons, small businesses, or nongovernmental groups as a result of the proposed rule change.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

There is no anticipated effect on competition and employment as a result of the proposed rule change.

Beth Scioneaux
Deputy Superintendent
2407#043

Patrice Thomas
Deputy Fiscal Officer
Legislative Fiscal Office

NOTICE OF INTENT

Board of Elementary and Secondary Education

Criminal Background Checks and Reporting Requirements
(LAC 28:LXXIX.123; CXXV.501; CXXXI.303, 1901,
1903, 1904, 1907, 1909, 1911, 1913, 1917, and 1919)

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:LXXIX in *Bulletin 741(Nonpublic)—Louisiana Handbook for Nonpublic*

ATTACHMENT #

OFFICERS

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President,
Vernon

KATHERINE K. LEMOINE
President-elect,
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Vice-President,
Ascension

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APPOINTEES

BRANDON HARRELL
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HANNAH SMITH-MASON
Lafayette

KASANDRIA WHITE
Red River

DR. JANET POPE
EXECUTIVE DIRECTOR



August 8, 2024

Kimberly Tripeaux
Interim Executive Director
Board of Elementary and Secondary Education
Box 94064 Capitol Station
Baton Rouge, LA 70804-9064

RECEIVED

AUG 08 2024

Board of Elementary
and Secondary Education

Dear Ms. Tripeaux:

The Louisiana School Boards Association hereby makes a formal request for a hearing to allow our staff and members to make oral presentations and arguments on the proposed changes to Bulletin 111, as shown in the Notice of Intent published in the Louisiana Register on July 20, 2024.

I can be reached by phone at 225-769-3191 or via email at jpope@lsba.com should you need to contact me.

Sincerely,

Janet Pope, Ed.D.
Executive Director
Louisiana School Boards Association



Louisiana Association of School Superintendents

August 8, 2024

Kimberly Tripeaux
Interim Director
Board of Elementary and Secondary Education
Box 94064 Capitol Station
Baton Rouge, L. 70804-9064

RECEIVED

AUG 08 2024

Board of Elementary
and Secondary Education

Dear Ms. Tripeaux:

The Louisiana Association of Schools Superintendents hereby respectfully request a formal hearing to allow members of our organization to make oral presentations and arguments on the proposed changes to Bulletin 111, as shown in the Notice of Intent published in the Louisiana Register on July 20, 2024.

I may be reached by phone at 225-229-6021 or by email at mfaulk65@gmail.com should you need to contact me.

Sincerely,

Michael W. Faulk,

Executive Director, Louisiana Association of School Superintendents.

ATTACHMENT #3

PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
 NAME: Lenny Kopowski
 REPRESENTING: Magnolia Strategic
 MEETING: B E S E
(PLEASE PRINT)
 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION WISH TO SPEAK
- OPPOSE RECOMMENDATION DO NOT WISH TO SPEAK
- INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 12-26-24 ✓
 NAME: Evan Alvarez
 REPRESENTING: Magnolia Strategic
 MEETING: B E S E
(PLEASE PRINT)
 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION WISH TO SPEAK
- OPPOSE RECOMMENDATION DO NOT WISH TO SPEAK
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: Alex Goodling
REPRESENTING: Northwood - Leona HS - Rep. does for it
MEETING: WESF - 6:00 PM - Arrowhead

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24
NAME: Jenny Hebert ✓
REPRESENTING: CSB CALAGIEM
MEETING: Public Hearing

AGENDA ITEM NUMBER: 1
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Hennesy Melancon
REPRESENTING: LAP HR 201 Study Group
MEETING: Balletin III Hearing

AGENDA ITEM NUMBER: #3
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: HEATH HULIN
REPRESENTING: Iberia Parish Schools
MEETING: Accountability Hearing

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: RONNY SEAL

REPRESENTING: ST. CHARLES PARISH PUBLIC SCHOOLS
(PLEASE PRINT) (ORGANIZATION/AGENCY/SELF)

MEETING: ACCOUNTABILITY PUBLIC HEARINGS

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

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- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24

NAME: Michael Pedrathy

REPRESENTING: Bossier Parish Public Schools - HR 261
(PLEASE PRINT) (ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin 111 Hearing
Study Group

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Stephen Zafirau

REPRESENTING: St. Charles Parish Public Schools
(PLEASE PRINT) (ORGANIZATION/AGENCY/SELF)

MEETING: Accountability Public Hearing

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024

NAME: Kristie Williams

REPRESENTING: Laqueunes Parish - Phoenix High
(PLEASE PRINT) (ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing - 111

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024

NAME: Kristie Williams

REPRESENTING: Laqueunes Parish - Phoenix High
(PLEASE PRINT) (ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing - 111

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____

(Example: 4.2.)

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Andrew Fox

REPRESENTING: Hammond, Sills, Alvar, Lewis, Robb & Perkins
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Rule Making

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 08/26/24 ✓
NAME: Beth Billing

REPRESENTING: St. Charles Parish State Rep. Dist. 52
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: _____
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: Accountability
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
(as written)
- INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Jane Biggs

REPRESENTING: Ouachita Parish Schools
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing - Bulletin 11
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓
NAME: CHARO Bossier-Holden

REPRESENTING: Parents St. John the Baptist Parish Schools
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin #11 Public Hearing
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: #1
(Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: Lisa Burns
REPRESENTING: Bossier Schools (PLEASE PRINT)
MEETING: Public Hearing - Bulletin 111 (ORGANIZATION/AGENCY/SELF)

AGENDA ITEM NUMBER: _____ (Example: 4.2.)
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: TRINA BROWN
REPRESENTING: Red River Parish School Board (PLEASE PRINT)
MEETING: Bulletin 111 (ORGANIZATION/AGENCY/SELF)

AGENDA ITEM NUMBER: _____ (Example: 4.2.)
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: J.C. Dinkley III (PLEASE PRINT)
REPRESENTING: Red River Schools (ORGANIZATION/AGENCY/SELF)
MEETING: Bulletin 111 (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____ (Example: 4.2.)
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Atharine Claphus (PLEASE PRINT)
REPRESENTING: Calcasieu (ORGANIZATION/AGENCY/SELF)
MEETING: Accountability (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____ (Example: 4.2.)
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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/20/24

NAME: Nicole Eason

REPRESENTING: Red Riv. Parish (PLEASE PRINT)

MEETING: Bulletin 11 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

SUPPORT RECOMMENDATION

OPPOSE RECOMMENDATION

INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Rose Dominguez

REPRESENTING: La School Board (PLEASE PRINT)

MEETING: BESE/NOF accountability (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER:

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/20/24

NAME: Margaret Haman

REPRESENTING: Ouachita Parish (PLEASE PRINT)

MEETING: BESE Public Hearing (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

SUPPORT RECOMMENDATION

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24

NAME: Michael Fowler

REPRESENTING: La. Assoc. of School Super (PLEASE PRINT)

MEETING: Public Hearing Bulletin 11 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

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INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Michael Fowler

REPRESENTING: La. Assoc. of School Super (PLEASE PRINT)

MEETING: Public Hearing Bulletin 11 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

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SUPPORT RECOMMENDATION

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: Amity Hay (PLEASE PRINT)
 REPRESENTING: Jackson (ORGANIZATION/AGENCY/SELF)
 MEETING: Accountability
 AGENDA ITEM NUMBER: _____ (Example: Educator Effectiveness Committee)

- CHECK ONE BOX IN THIS COLUMN
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- OPPOSE RECOMMENDATION DO NOT WISH TO SPEAK
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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: Larry Hollie (PLEASE PRINT)
 REPRESENTING: BEAUFORT PARISH (ORGANIZATION/AGENCY/SELF)
 MEETING: Public Hearing Accountability
 AGENDA ITEM NUMBER: _____ (Example: Educator Effectiveness Committee)

- CHECK ONE BOX IN THIS COLUMN
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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: Melinda Hardy (PLEASE PRINT)
 REPRESENTING: Red River Parish School Board (ORGANIZATION/AGENCY/SELF)
 MEETING: Bulletin 11
 AGENDA ITEM NUMBER: _____ (Example: Educator Effectiveness Committee)

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓
 NAME: Harley Holley (PLEASE PRINT)
 REPRESENTING: Ourachata Parish Schools (ORGANIZATION/AGENCY/SELF)
 MEETING: Public Hearing - Bulletin 11
 AGENDA ITEM NUMBER: _____ (Example: Educator Effectiveness Committee)

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Byron Huest (PLEASE PRINT)

REPRESENTING: Bogalusa City Schools (ORGANIZATION/AGENCY/SELF)

MEETING: State Accountability System (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

SUPPORT RECOMMENDATION

OPPOSE RECOMMENDATION

INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Frances LeBlanc (PLEASE PRINT)

REPRESENTING: Jefferson Davis School Board (ORGANIZATION/AGENCY/SELF)

MEETING: Accountability (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

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INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓

NAME: Maribeth Holzer (PLEASE PRINT)

REPRESENTING: Ouachita Parish (ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing - Bullock III (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

SUPPORT RECOMMENDATION

OPPOSE RECOMMENDATION

INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓

NAME: FRANK JACOBIA (PLEASE PRINT)

REPRESENTING: St Tammany Parish Public Schools (ORGANIZATION/AGENCY/SELF)

MEETING: Accountability Public Hearing (Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

SUPPORT RECOMMENDATION

OPPOSE RECOMMENDATION

INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Kelley Lee (PLEASE PRINT)

REPRESENTING: Red River Parish School Board (ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Marianne Little (PLEASE PRINT)

REPRESENTING: Winn Parish School Board (ORGANIZATION/AGENCY/SELF)

MEETING: Accountability (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: (Example: 4.2.)

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓

NAME: Cleve Miller (PLEASE PRINT)

REPRESENTING: Red River Parish School Board (ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin 11 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Lillie M. Donald (PLEASE PRINT)

REPRESENTING: Red River Parish School Board (ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin 11 (ORGANIZATION/AGENCY/SELF)

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1 (Example: 4.2.)

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Diane Newton (PLEASE PRINT) ✓
REPRESENTING: Red River (ORGANIZATION/AGENCY/SELF)
MEETING: Buffetville III
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Keisha Nettelle (PLEASE PRINT) ✓
REPRESENTING: East Feliciana Public Schools (ORGANIZATION/AGENCY/SELF)
MEETING: LA Acctb. Public hearing
AGENDA ITEM NUMBER: Item 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Kimberly Patton (PLEASE PRINT) ✓
REPRESENTING: Calcasieu Parish (ORGANIZATION/AGENCY/SELF)
MEETING: BSEF Accountability (Example: Educator Effectiveness Committee)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Keisha Nettelle (PLEASE PRINT) ✓
REPRESENTING: East Feliciana Public Schools (ORGANIZATION/AGENCY/SELF)
MEETING: LA Acctb. Public hearing
AGENDA ITEM NUMBER: Item 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Keisha Nettelle (PLEASE PRINT) ✓
REPRESENTING: East Feliciana Public Schools (ORGANIZATION/AGENCY/SELF)
MEETING: LA Acctb. Public hearing
AGENDA ITEM NUMBER: Item 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-2024
NAME: Daniel Pickett
REPRESENTING: Red River Parish School District
MEETING: Bulletin 11
AGENDA ITEM NUMBER: State Accountability

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 08/26/2024
NAME: DR. JANET POPE
REPRESENTING: LA SCHOOL BOARDS ASSOCIATION
MEETING: Public Hearing Bulletin 11
AGENDA ITEM NUMBER: _____

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24
NAME: Reba Phelps
REPRESENTING: Natchitoches Parish School Board
MEETING: Public Hearing
AGENDA ITEM NUMBER: Bulletin 11

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24
NAME: Norm Klein
REPRESENTING: Red River Parish
MEETING: Bulletin 11
AGENDA ITEM NUMBER: _____

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Lady Parish
REPRESENTING: Livingston Parish Public School
MEETING: Accountability Public Hearing
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Seth Shepard
REPRESENTING: Plaquemines Parish Schools
MEETING: Public Hearing
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24
NAME: Jeff Powell
REPRESENTING: Rapides Parish
MEETING: Accountability
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION *as written*
 - INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024
NAME: Dr. Shelley M. Ritz
REPRESENTING: Plaquemines Parish School Bd.
MEETING: Public Hearing
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Alyssa Stelly

REPRESENTING: Louisiana A+ Teachers Association

(ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024

NAME: Joni Smith

REPRESENTING: Cameron Parish

(ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing Regarding Rule Making

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER:

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Alyssa Stelly

REPRESENTING: Louisiana A+ Teachers Association

(ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024

NAME: Carol Tall

REPRESENTING: Acadia Parish

(ORGANIZATION/AGENCY/SELF)

MEETING: Public Hearing - Rulemaking

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER:

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24

NAME: Alison Strong

REPRESENTING: Red River School Board

(ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin 111

(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER:

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: Susan Taylor
REPRESENTING: Red River School Bd (PLEASE PRINT)
MEETING: Balletin III - I (ORGANIZATION/AGENCY/SELF)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Vernon Travis (PLEASE PRINT)
REPRESENTING: LSBA (ORGANIZATION/AGENCY/SELF)
MEETING: BESE - Balletin III (Example: Educator Effectiveness Committee)
AGENDA ITEM NUMBER: Not (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Susan Taylor
REPRESENTING: Red River School Bd (PLEASE PRINT)
MEETING: Balletin III - I (ORGANIZATION/AGENCY/SELF)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Jazzy Tribodaux (PLEASE PRINT)
REPRESENTING: Acadia Parish Schools - HR 281 Focus Grp (ORGANIZATION/AGENCY/SELF)
MEETING: public hearing re rulemaking (Example: Educator Effectiveness Committee)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024
NAME: Karen M. Triche (PLEASE PRINT)

REPRESENTING: Self
MEETING: Public Hearing on Bulletin 11 (ORGANIZATION/AGENCY/SELF)
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: 1
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024
NAME: Edith Nauker (PLEASE PRINT)

REPRESENTING: Ascension Parish
MEETING: Public Hearing (ORGANIZATION/AGENCY/SELF)
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26
NAME: Rebecca Wheeler (PLEASE PRINT)

REPRESENTING: Red River Parish
MEETING: B.E.S.E (ORGANIZATION/AGENCY/SELF)
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Kathy Wheeler (PLEASE PRINT)

REPRESENTING: Ourchita Parish Schools
MEETING: Public Hearing - Bulletin 11 (ORGANIZATION/AGENCY/SELF)
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: #
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26
NAME: MIKE BECK
REPRESENTING: Red River Parish
MEETING: BULLETIN
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-28
NAME: Thomas J. Byler
REPRESENTING: Vermilion Parish
MEETING: Public Hearings
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24
NAME: Richard Baker PhD
REPRESENTING: Louisiana Federation of Teachers
MEETING: Bulletin 11 hearing
AGENDA ITEM NUMBER: 1

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24
NAME: David Broussard
REPRESENTING: IPSD - LFS Iberia
MEETING: 111
AGENDA ITEM NUMBER: 111

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
 - OPPOSE RECOMMENDATION
 - INFORMATION ONLY/OTHER
- CHECK ONE BOX IN THIS COLUMN
- WISH TO SPEAK
 - DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: JORDAN FORD

REPRESENTING: LINCOLN PREP CAP Act 211 TASK FORCE
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Bulletin 111 Public Hearings

AGENDA ITEM NUMBER: 1
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- WISH TO SPEAK
- OPPOSE RECOMMENDATION
- DO NOT WISH TO SPEAK
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 26 Aug 24 ✓

NAME: Kurt Carpenter

REPRESENTING: Pineville High Rapides Parish
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Accountability

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- WISH TO SPEAK
- OPPOSE RECOMMENDATION
- DO NOT WISH TO SPEAK
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓

NAME: Kelly Labauve

REPRESENTING: LSBA
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Accountability Public Hearing

AGENDA ITEM NUMBER: N/A
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- WISH TO SPEAK
- OPPOSE RECOMMENDATION
- DO NOT WISH TO SPEAK
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-2024 ✓

NAME: Dannie Garrett

REPRESENTING: LA School Boards Association
(PLEASE PRINT)
(ORGANIZATION/AGENCY/SELF)

MEETING: Accountability N/A
(ORGANIZATION/AGENCY/SELF)
(Example: Educator Effectiveness Committee)

AGENDA ITEM NUMBER: _____
(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- WISH TO SPEAK
- OPPOSE RECOMMENDATION
- DO NOT WISH TO SPEAK
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: DR. JONATHAN LOVEALL
 REPRESENTING: EAST FELICIANA PUBLIC SCHOOLS
 MEETING: LA Acad. Public Hearing
 AGENDA ITEM NUMBER: Item 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: Dr. Melissa Langlois
 REPRESENTING: St Tammany
 MEETING: Accountability Public Hearings
 AGENDA ITEM NUMBER: Item 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/24/24 ✓
 NAME: Kelli Cortling
 REPRESENTING: LAP and St. Charles Parish Public Schools
 MEETING: Bulletin 11 Public Hearing
 AGENDA ITEM NUMBER: 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
 NAME: Tony McCardle
 REPRESENTING: Calcasieu Parish / Louisiana Educ. Assoc.
 MEETING: BESÉ Legislative Public Hearings
 AGENDA ITEM NUMBER: 1 (Example: 4.2.)

- CHECK ONE BOX IN THIS COLUMN
- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Jennifer Begard (PLEASE PRINT)
REPRESENTING: Iberia Parish (ORGANIZATION/AGENCY/SELF)
MEETING: Public Hearing
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: DA Ken Dentling (PLEASE PRINT)
REPRESENTING: LASS - President (ORGANIZATION/AGENCY/SELF)
MEETING: _____
AGENDA ITEM NUMBER: Accountability (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Joyce Russ (PLEASE PRINT)
REPRESENTING: Tensas Parish (ORGANIZATION/AGENCY/SELF)
MEETING: Accountability (Example: Educator Effectiveness Committee)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: Niles Reneo (PLEASE PRINT)
REPRESENTING: Iberia Parish School Board (ORGANIZATION/AGENCY/SELF)
MEETING: Hearing on New Accountability (Example: Educator Effectiveness Committee)
AGENDA ITEM NUMBER: 1 (Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

Public comments are limited to no more than three (3) minutes per individual and five (5) minutes per designated spokesperson of a group/organization. The chair may increase or decrease the time allotted to speakers, within time constraints.

PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-24 ✓
NAME: Cheryl Sextett
(PLEASE PRINT)
REPRESENTING: LSBA
(ORGANIZATION/AGENCY/SELF)
MEETING: Public Hearing
AGENDA ITEM NUMBER: Bulletin 111
(Example: Educator Effectiveness Committee)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8-26-2024 ✓
NAME: Debbie Schur
(PLEASE PRINT)
REPRESENTING: Self / St. Ignace Parish School Board
(ORGANIZATION/AGENCY/SELF)
MEETING: Public Hearing on Bill 111
AGENDA ITEM NUMBER: 1
(Example: Educator Effectiveness Committee)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓
NAME: Doris Voitier
(PLEASE PRINT)
REPRESENTING: St. Bernard Parish School Board
(ORGANIZATION/AGENCY/SELF)
MEETING: Public Hearing
AGENDA ITEM NUMBER: _____
(Example: Educator Effectiveness Committee)

CHECK ONE BOX IN THIS COLUMN
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 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/2024 ✓
NAME: Bill Thompson
(PLEASE PRINT)
REPRESENTING: Louisiana Agriculture Teachers Assn
(ORGANIZATION/AGENCY/SELF)
MEETING: BESE Public Hearings
AGENDA ITEM NUMBER: _____
(Example: Educator Effectiveness Committee)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
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 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD
STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/26/24 ✓
NAME: Bill Thompson
(PLEASE PRINT)
REPRESENTING: Louisiana Agriculture Teachers Assn
(ORGANIZATION/AGENCY/SELF)
MEETING: BESE Public Hearings
AGENDA ITEM NUMBER: _____
(Example: Educator Effectiveness Committee)

CHECK ONE BOX IN THIS COLUMN
 SUPPORT RECOMMENDATION
 OPPOSE RECOMMENDATION
 INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN
 WISH TO SPEAK
 DO NOT WISH TO SPEAK

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PUBLIC COMMENT CARD

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION

DATE: 8/20/24 ✓

NAME: Kristy Wells

REPRESENTING: Caldwell Parish (PLEASE PRINT)

MEETING: Accountability (ORGANIZATION/AGENCY/SELF)

AGENDA ITEM NUMBER: 1 (Example: Educator Effectiveness Committee)

(Example: 4.2.)

CHECK ONE BOX IN THIS COLUMN

- SUPPORT RECOMMENDATION
- OPPOSE RECOMMENDATION
- INFORMATION ONLY/OTHER

CHECK ONE BOX IN THIS COLUMN

- WISH TO SPEAK
- DO NOT WISH TO SPEAK

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ATTACHMENT #4

Louisiana State Board of Elementary and Secondary Education
Public Hearing
Monday, August 26, 2024
10:00 a.m.
Minutes

The public hearing regarding revisions to Bulletin 111, *The Louisiana School, District, and State Accountability System*, was held on Monday, August 26, 2024, in the Louisiana Purchase Room, located in the Claiborne Building in Baton Rouge, Louisiana. The meeting was called to order at 10:02 a.m. by Mr. Ronnie Morris. Board members present were Ms. Simone Champagne and Dr. Sharon Clark.

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 Tavares Walker, Ms. Amanda LaGroue, and Ms. Erin LeBlanc, who recorded the minutes.

Mr. Morris advised the audience that this public hearing was being held in order to receive public recommendations and input regarding revisions to Bulletin 111, *The Louisiana School, District, and State Accountability System*. A report of comments will be composed and presented for the Board's consideration at the appropriate time.

Mr. Morris 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 111. 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. Richard Baker, Louisiana Federation of Teachers; Mr. Andrew Barr, Hammond, Sills, Adkins, Guice, Noah, and Perkins; Mr. Mike Beck, Ms. Trina Brown, Mr. J.C. Dickery, Ms. Nicole Eason, Ms. Melinda Hardy, Ms. Kelley Lee, Ms. Lillie McDonald, Mr. Cleve Miller, Ms. Diane Newton, Mr. Daniel Pickett, Mr. Norm Picou, Superintendent Alison Strong, Ms. Susan Taylor, and Ms. Deborah Webb, Red River Parish School System; Ms. Jane Biggs, Ms. Margaret Haman, Ms. Haley Holley, Ms. Maribeth Holzer, and Ms. Katy Wheeler, Ouachita Parish School System; Representative Beth Billings, District 56; Mr. David Broussard, Ms. Jennifer Regard, and Mr. Niles Romero, Iberia Parish School

System; Ms. Lisa Burns, Bossier Parish School System; Superintendent Thomas Byler, Vermilion Parish School System; Mr. Karl Carpenter and Ms. Kerri Nichols, Superintendent Jeff Powell, Rapides Parish School System; Ms. Katherine Clophus, Ms. Tammy Hebert, Mr. Tony McCardle, and Ms. Kimberly Patton, Calcasieu Parish School System; Ms. Rose Dominguez, Mr. Dannie Garrett, Ms. Kelly LaBauve, Dr. Janet Pope, Ms. Cheryl Serrett, and Mr. Vernon Travis, Louisiana School Boards Association; Mr. Michael Faulk and Dr. Ken Oertling, Louisiana Association of School Superintendents; Mr. Gordan Ford, Lincoln Preparatory School; Ms. Amy Hay, Jackson Parish School System; Mr. Larry Hollie, Beauregard Parish School System; Mr. Byron Hurst, Bogalusa City School System; Superintendent Frank Jabbia and Dr. Melissa Langlois, St. Tammany Parish School System; Ms. Frances LeBlanc, Jefferson Davis School System; Ms. Marianne Little, Winn Parish School System; Dr. Jonathan Loveall and Superintendent Keisha Netterville, East Feliciana School System; Ms. Kelli Oertling, St. Charles Parish School System; Ms. Reba Phelps, Natchitoches Parish School System; Mr. Jody Purvis, Livingston Parish School System; Dr. Shelley Ritz and Mr. Seth Shepard, Plaquemines Parish School System; Superintendent Joyce Russ, Tensas Parish School System; Ms. Joni Smith, Cameron Parish School System; Ms. Alyssa Stelly and Mr. Bill Thompson, Louisiana Agriscience Teachers Association; Ms. Carol Tall and Ms. Jazzy Thibodeaux, Acadia Parish School System; Ms. Sara Taylor, Pointe Coupee Parish School System; Superintendent Doris Voitier, St. Bernard Parish School System; Dr. Edith Walker, Ascension Parish School System; Ms. Kristy Wells, Caldwell Parish School System; and Mr. Charo Bossier-Holden, Ms. Debbie Schurn, and Ms. Karen Triche, concerned citizens.

Comments with information only were received from Mr. Evan Alvarez and Mr. Lenny Kopowski, Magnolia Strategic; Mr. Alex Goodling, Rapides Parish School System; Mr. Heath Hulin, Iberia Parish School System; Mr. Hennessy Melancon, Louisiana Association of Principals; Mr. Michael Pedrotty, Bossier Parish Public School System; Mr. Ronny Seal and Mr. Stephen Zafirau, St. Charles Parish School System; and Ms. Kristie Williams, Plaquemines Parish School System.

There were no comments received in support.

With no further business to come before the Public Hearing, the meeting was adjourned at 11:59 a.m.

ATTACHMENT #5

Summary of Public Comments and Agency Response

Regarding Proposed Revisions to Louisiana’s K-12 School Accountability System in *Bulletin 111 - The Louisiana School, District, and State Accountability System*

Background

In January 2024, the Louisiana Board of Elementary and Secondary Education (BESE) directed the Louisiana Department of Education (LDOE) to present recommendations at the June meeting to revise the Louisiana K-12 school accountability system. The recommendations were to:

- Be strongly influenced by the College and Career Readiness definition;
- Include methodology and weighting for both absolute performance and student growth;
- Include appropriate timelines for implementation, given special consideration for any high school scheduling adjustments; and
- Be strongly influenced by efforts to simplify the system.

Additionally, the LDOE was directed to issue a general survey to the public to collect feedback online. In response to that survey, more than 8,000 responses were received from the public.

Furthermore, the LDOE was directed to receive advanced revision feedback from the Superintendent’s Advisory Council and the Accountability Council. The proposed revision recommendations were presented to the Accountability Council on May 6, 2024, and to the Superintendent’s Advisory Council on June 6, 2024.

In June 2024, the LDOE recommended, and BESE approved, revisions to *Bulletin 111 - The Louisiana School, District, and State Accountability System*. The Notice of Intent (NOI) was published in the July 20, 2024, issue of the [Louisiana Register](#).

Following that approval, two requests for a public hearing were received from the Louisiana School Boards Association and the Louisiana Association of School Superintendents. As these organizations include more than twenty-five (25) members, a public hearing was held on Monday, August 26, 2024. This report includes a summary of comments, the LDOE response to the comments, and the LDOE recommendation for action in response to the comments.

Summary of Comments Received

During the public hearing, seventy-nine (79) public comment cards were collected. Two (2) were submitted for information only, not wishing to speak. Eight (8) were submitted for information only, wishing to speak. Forty-eight (48) cards were submitted in opposition, not wishing to speak. Twenty-one (21) cards were submitted in opposition, wishing to speak.

A summary of the comments received during the public hearing are organized into categories and subcategories on the following pages. A response to each subcategory begins on page 7.

I. Accountability Formula Values

A. Misplaced purpose of high school, and measures besides testing should be used to rate the quality of a school.

Commenters argued that the increased emphasis on six assessments will result in unintended negative consequences, such as students taking academic courses such as math and English multiple times during high school in an attempt to improve an assessment score and, as a result, not having time to take CTE courses needed for life after high school. Commenters further argued that the purpose of high school is to take students where they are and get them ready for life after high school, regardless of where they are academically when they arrive in high school. Arguing that it is too much to require high schoolers to show that they are ready for life after high school, commenters felt that students should be able to enjoy high school. They argued that instead of requiring tests for graduation, the work done to get students to graduation should be more highly valued, allowing students to just get a diploma without having to also do more work. Another commenter remarked that older students know that an approaching basic is sufficient for them to graduate, and do not care to invest the extra effort it takes to earn a higher score, thereby penalizing schools for students' lack of motivation. One commenter suggested that the system include qualitative data gathered from parents and students. Commenters further argued that teachers of other subjects will feel undervalued if so much emphasis is placed on tested subjects, expressing concern that the revised system will put great emphasis on six of the 240 courses offered and will increase the difficulty of recruiting and retaining teachers for subjects that are not seen as important.

B. Devaluing of Career and Technical Education (CTE), agriculture, music, and the arts.

Several commenters mentioned that their districts had spent considerable funds on developing CTE programs but that the revised system will devalue those programs from 25% to 8% of possible scores. One commenter challenged the idea of having students earn basic bundles, while another remarked that an internship not aligned to a course of study will not be impactful for students. To support the argument that CTE is being devalued, a commenter mentioned that according to simulated scores, districts in Region 6 offering nearly 700 CTE courses will be rated at C and F in the revised system and that some systems currently earning an A in strength of diploma are projected to fail the career accelerator. Several commenters

expressed concern that agricultural education will be deprioritized and requested that the supervised agriculture experience be allowed to count as an internship. Other commenters argued that a well-rounded education should include music and the arts, especially in Louisiana, but expressed concern that schools will stop offering courses in music and the arts if they are not included in the accountability system.

C. Expectations of internship or college-level coursework for all students are unreasonable.

Commenters argued that students mature at different rates and that not all students are ready to engage in an internship or in college-level coursework while they are in high school. Concerned that industry-based credentials will now be more difficult for students to earn, several commenters challenged the way that the revised accountability formula “radically” redefines student success and asked BESE to consider reverting to a success definition more aligned with the asks of other commenters.

D. Some students will be unable to reach full potential.

One commenter argued that the revised system will make it virtually impossible for low-performing students to reach their full potential. Commenters requested that the system be aligned with the BESE and LDOE vision as well as that of the Governor and legislature and provide for mutual accountability.

E. Unclear goals and moving targets for schools.

Commenters expressed confusion regarding the objectives of the revised system, arguing that schools will be unsure of their goals and frustrated when they reach a target only to have the bar raised higher in a subsequent year. Other commenters remarked that designating 10% of schools as failing regardless of their growth indicates a continued moving target and that schools and districts will be rated low even if they grow. Commenters felt that the district performance score calculation will confuse stakeholders, who will think that all the schools in a district are bad if a district score is bad. Concerned that automatic grading scale increases will build mediocrity into the process, several commenters argued that the highest scoring schools under the revised system will be those with selective admissions criteria, giving them an unfair advantage.

II. Accountability Formula Design

A. Reduced transparency.

A commenter argued that increasing the minimum n size to 15 will eliminate reporting for certain schools and subgroups, suggesting that schools be able to opt in to reporting for a subgroup with n less than 15, especially for schools with a graduation cohort of less than 15 students. Another commenter argued that combining results for the classes of 2025 and 2026 will hide true information about those cohorts. Others complained that students with disabilities will be counted twice – once as a subgroup and again in the lowest 25%. Another commenter argued that ACT also counts twice now because it is in the national assessment indicator and again in the university accelerator indicator and that some students may make a 19 on the ACT but be able to pass an AP exam.

B. Inconsistent English Learner (EL) weighting.

Commenters argued that the proportion of ELs in various schools and districts will result in inconsistent weighting, with 78% of high schools projected to receive an F in EL growth, and 33% of elementary and middle schools projected to receive an F in EL growth. A commenter remarked that because it is hard to learn a language as one gets older, the growth expectation for ELs should be easier to allow for more growth, maybe by cutting the achievement levels in half. The commenter recommended that the weight for English learners be higher in schools with higher EL populations and lower in schools with lower EL population. Another commenter also expressed a preference for the EL weighting in the current accountability system, arguing there is no incentive for schools to work to improve outcomes for English learners if they have fewer than 15 enrolled.

C. The system should expand options to demonstrate college readiness.

Commenters argued that the Board of Regents uses more than assessments to determine whether a student is ready for college and that some students who test poorly do fine in college. A commenter suggested that the norm-referenced assessment indicator should be removed or reduced and that associate degrees should be allowable as an indicator of college readiness. Commenters further argued that a student who gets a 19 on the ACT should not get a 0 in accountability and that a student who scores a 36 on the ACT should not earn the same credit as a student who scores a 20.

D. The alternative school accountability system conflicts with the rest of the policy.

Commenters argued that the policy conflicts with itself and that it “will be harder to be an A school at an alternative school than at a traditional school.”

E. §1709 conflicts with R.S. 17:3911.C.(5) regarding the changing of exit codes without concurrence of the city, parish, or other local public school system.

A commenter argued that schools are unable to obtain documentation needed for exit codes from students who have left. This commenter further argued that because end-of-course exams are required for public school graduation but not for private school graduation, some seniors exit to nonpublic school in the senior year so they can graduate without having to pass the exams.

III. Implementation Concerns

A. Lower school and district grades under the revised system will diminish the public’s trust in the school system.

Commenters expressed concern that school and district grades will be lower under the revised system, possibly resulting in businesses not moving into some parishes or fewer people choosing public schools for their children’s education. Some schools have worked very hard to improve under the current model, and fears were expressed that it will look as though they have not improved at all. One commenter reported that simulated results suggest that the grades of 80% of high schools will drop, along with 30-40% of elementary and middle schools.

B. Checkbox mentality and higher cost of CTE.

Commenters argued that the various options to demonstrate acceleration would result in schools and systems identifying the simplest way to achieve a successful mark instead of truly working to ensure that students are ready for life after high school. One commenter posited that if college credits will be easier to earn than IBCs, fewer students will have access to career preparation as schools attempt to maximize credit earned, or that the relatively high cost of career courses that are valuable to industry in comparison with the cost of dual enrollment and Advanced Placement courses will result in schools promoting more cost-effective options instead of prioritizing the courses needed by the Louisiana workforce. One commenter reported that a certificate of technical studies costs \$185 per credit for 33 hours, which is cost-prohibitive for most districts.

C. Internship barriers.

Commenters argued that some districts, like Iberia Parish, are very rural and do not have enough industry to offer internships to all the students who will need them while in others, like Caldwell Parish, the school board is the largest employer. Commenters identified multiple barriers to being able to offer internships to students, mentioning that some businesses do not employ students until they are 18 while others have company policy that prohibits them from paying students who are under 18 and who do not have a diploma. Additional funding being offered to support internships will be helpful, but districts reported not knowing whether that funding will be available for more than one year, making long-term planning more difficult. Further concerns were expressed about the availability of registered apprenticeships in various parts of the state or about the lack of variety in the available apprenticeships offered to give students choice in the career path they pursue.

D. Lack of clarity regarding basic bundles.

Commenters argued that basic bundles are not available for schools to use in planning for students and that it is further unclear which advanced credentials will link to basic bundles. Some districts who have regular meetings with their workforce development boards feel they do not have enough information to engage with them and prepare for implementation. Commenters argued that they need to be able to plan for next year's seniors to take basic bundles, which could comprise several classes, and that without knowing what those are, they are unsure whether they can make room in the schedule for the upcoming seniors to take enough classes in time.

E. The change is too quick and too drastic.

One commenter requested an additional gap year to prepare for students to have time to earn credentials and bundles. Commenters pointed out that the current top four districts will drop to C and F letter grades under the simulated scores, yet these are the districts offering the most opportunity for CTE and workforce development to students. One commenter argued that the message will be that CTE is not really important, and the legitimacy of the system will be questioned when top-tier performers drop to the lowest tier.

F. Unrealistic expectations for time during the school day.

One commenter argued that there is not time in the school day to provide high-dosage tutoring in ELA and math while also preparing for assessments in science and social studies.

IV. Assessments

A. The system should include only the minimum number of assessments required by ESEA.

Commenters recommended that social studies not be tested at all, that only math and ELA be tested in third and fourth grades, and that science be tested once in middle school and once in high school. Commenters also argued that while a legislative study group is discussing potential recommendations for less testing, the revised system will require more emphasis on testing. One commenter felt that the growth component is punitive because “when you grow, the bar keeps getting raised, with no true target in sight.” Another commenter remarked that not giving partial credit for a basic is not accepting that students learn at different rates since basic might be a student’s maximum potential for growth as their brain develops.

B. Issues with the current state assessment.

Commenters argued that the large number of students performing poorly on the assessment indicates that the assessment itself is flawed. This commenter argued that the proposed system still uses LEAP as the main testing tool and that the upcoming assessment contract should be used to identify tools that better measure and prepare students for standardized assessments.

C. Expectations of proficiency are unreasonable.

Commenters argued that having to take remedial courses is not a bad thing and that students who are behind when they enter college can still be successful in the long term. These commenters argued that some students may not perform well on high stakes testing but may have other attributes that will help them be successful in life. Another commenter argued that students with disabilities may not be able to reach proficiency and that schools should receive partial credit for students who achieve basic. Commenters recommended that the required ACT score be lower and argued that test performance is also a factor of environment, which is not accounted for in the revised system.

D. Questions about the CLT.

One commenter questioned the inclusion of the Classical Learning Test (CLT), stating that College Board does not consider CLT as comparable to ACT or SAT. This commenter also questioned the concordance scores in Section 1711 of the revised policy.

E. Increased emphasis on third grade.

Several commenters remarked that third grade students are doubly tested using LEAP and DIBELS and expressed concern about overtesting these students.

V. Process and Communication

A. More input should be solicited.

Commenters suggested that community town halls be conducted and that feedback from parents, teachers, counselors, school leaders, school psychologists, business/industry, and other members of the community should be sought.

B. Concerns about the intent behind the revised system.

Commenters asserted that the purpose of the changes is to undermine public trust in public education so that people will move to private schools through the LA GATOR program.

C. Additional clarity and communication needed on several points.

A commenter mentioned that some information presented in communications could be confusing regarding which assessments must be taken for the national assessment indicator. This commenter also expressed some confusion with whether course enrollment is required for CLEP credit.

Agency Response

ExcelinEd, a leading national education advocacy organization, published a statement lauding Louisiana’s revised accountability system on June 12, shortly after BESE’s unanimous approval of the revisions. This statement included the following:

“These reforms mark a significant step forward in simplifying school accountability to make it easier for parents, educators and the public to understand how schools are performing. By raising expectations for student achievement and postsecondary readiness, Louisiana leaders are better serving families, ensuring schools improve and securing a stronger future for the state. These improvements are not just about numbers and grades – they are about providing a clear, fair and rigorous framework that prioritizes student academic achievement, growth and readiness for life after high school.”

I. Accountability Formula Values

A. Misplaced purpose of high school, and measures besides testing should be used to rate the quality of a school.

The purpose of a school, district, and state accountability system is to transparently report the extent to which all students in public schools are achieving and progressing toward meeting the state’s goals for academic achievement and graduation rate. The current accountability system places an outsized weight on graduation, which has resulted in lower expectations of what it means to be a Louisiana graduate. Ultimately, Louisiana’s accountability system should be driven by whether students are able to thrive in post-secondary life. This includes not needing continued schooling if graduates wish to directly enter the workforce; being literate,

numerate, civic-minded; and having the choice to attend college or military service if so desired. Our current accountability system does a poor job of elevating these needs and hides how poorly the state is serving students seeking to enter the workforce or attend college.

The minimum expectation of schools should be that every student, regardless of ability or background, exits school having demonstrated command of the content deemed essential for K-12 education in Louisiana. While the 2023 statewide performance score was a 78.5 B, a much deeper investigation is required to learn that only 43% of students in third through eighth grades and high school were actually proficient in ELA or English, and 32% in mathematics. A focused look at high school results reveals that only 34.9% of high school students were proficient in math, and only 44.1% of high school students were proficient in English. The numbers are even more disconcerting for economically disadvantaged students, with only 34.5% proficient in English and 24.9% proficient in math. Perhaps most alarming are the numbers for students with disabilities, with only 10.2% proficient in English and a mere 9.8% proficient in math. Yet our current accountability system rates this performance as a 78.5 B.

For too long, the old accountability system has obfuscated academic achievement for all students by allowing success for some students to hide underperformance for other students. Louisiana's previous accountability system was criticized for being too complex for parents, educators and the public to understand; setting low expectations for improvement and postsecondary success; and being outdated in how it failed to value career and college readiness.

Instead of planning for students to take academic courses and examinations multiple times until a passing score is achieved, schools are encouraged to take advantage of scheduling flexibility to ensure that students are prepared to be successful in the first attempt. This may mean providing additional support through high-dosage tutoring or strategic interventions prior to scheduling the student in the course, giving students the time they need to learn and closing academic gaps. LDOE is providing guidance and support for districts regarding strategic staffing and scheduling in response to student needs. Louisiana should not be satisfied with consistently unsuccessful attempts at teaching students core knowledge considered foundational to adulthood. Rather, the accountability system will more accurately report the degree to which schools – and students – are achieving and making progress toward success.

The revised accountability formula reports the degree to which students are achieving proficiency in fundamental content. It is independent of graduation requirements and does not pretend to deliver a report of every activity offered by schools. For high schools, the system simply reports whether students have demonstrated or made progress toward proficiency in content. It measures whether students graduated. Finally, it measures whether students have demonstrated academic proficiency or skill attainment through a credential or experience, preparing them to compete for high-demand careers after high school or complete post secondary education. The system provides evidence of learning, opportunities to learn, and

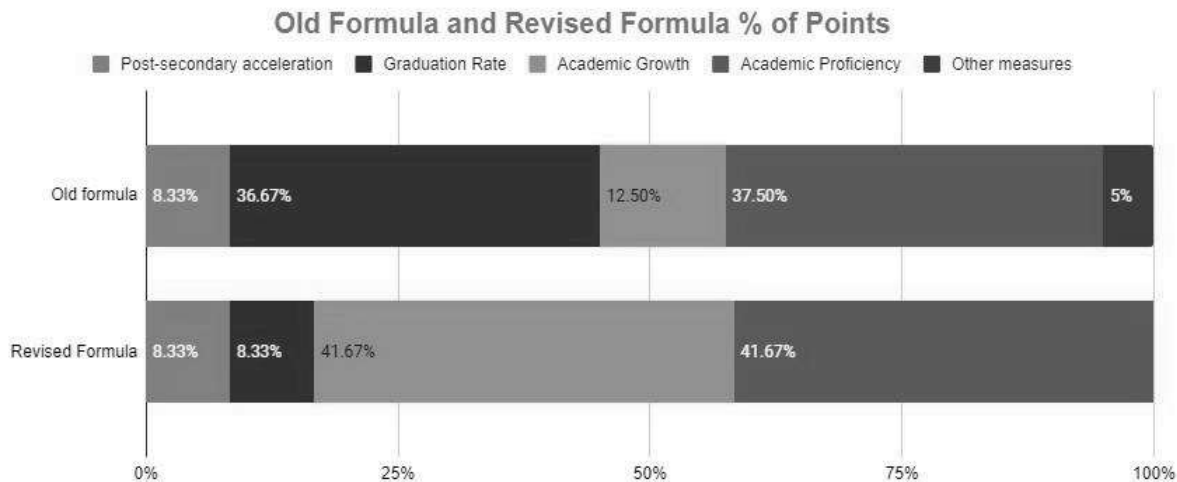
student engagement with those opportunities. It is not the role of an accountability system to provide evidence of student motivation.

LDOE understands that Louisiana has been long-challenged academically and that moving toward student proficiency in content will require hard work. A focus on high-quality teaching and learning will ensure that students are ready for assessments.

B. Devaluing of Career and Technical Education (CTE), agriculture, music, and the arts.

The notion that the revised accountability system devalues CTE is false. While employers ask for a stronger workforce, Louisiana continues to give itself an “A” (98.6) for “strength of diploma.” Meanwhile 16% of Louisiana’s 16-24 year olds are disconnected from work or school; and a parish in which 78% of its 16-24 year olds are disconnected from work and school earned a 103.6. The current accountability formula weights graduation outcomes at 37%, as a result a school could have 0 of its students reach proficiency; however, if they graduate 100% of their students on time and earn a 46, without a single student college ready or earning a workforce credential, all because they made sure every student got a diploma. Under the revised formula, that school would earn a 12.3. The focus will no longer be on the quantity of diplomas that can be provided to students, instead it will shift to say is this student ready for life after high school, did we give them every chance to thrive in Louisiana’s economy?

CTE is actually valued the same in both the current and revised systems. What causes concern for some individuals is that CTE is no longer hidden by the graduation rate. Schools earn up to 8.3% of the available credit when students earn credentials. In the old system, this occurred when a student earned an advanced credential, which generated an additional 50 points of the 600 possible points, or one twelfth of the points available for each student. In the revised system, this occurs when a student earns any of the options listed above and generates an affirmative answer to the question “Is this student demonstrably ready to thrive after high school?” This would generate credit for one twelfth of the available indicators. The figure below provides a visual representation of the changes in the distribution of available points among indicators within the formula.



The revised accountability system shifts CTE from a way to earn bonus points to an integral component of school, district, and state accountability. The support of Louisiana Workforce Commission (LWC), Louisiana Association of Business and Industry (LABI), Council for a Better Louisiana (CABL), Pelican Institute, Board of Regents, and the Louisiana Community and Technical College System (LCTCS), among others, illustrates the consensus that the revised system will be better for students and better for Louisiana. No longer can Louisiana rest on the laurels of graduating students and sending them to college with no hope of success. Instead we must be honest that our schools and systems must be held to a higher expectation – that just as we can get 82% of our students a diploma, we can get most of them a credential so they can get a good job.

In the old formula, schools and districts earned points in each of several indices. Each index offered points on a 150-point scale, and earning 100 points within an index was considered full credit. CTE was situated within the Strength of Diploma index, which awarded up to 160 points for each student. A student could generate 100 points for graduating from high school. A student could then generate an additional 10 points for earning a basic credential or an additional 50 points for earning an advanced credential. Advanced credentials are considered “high quality,” while basic credentials such as Adobe Photoshop and CIW Internet Business Associate offer very limited value to students who earn them and are generally in low demand in the workforce. Because of the way the current accountability system was designed, the Strength of Diploma index created an illusion of developing workforce-ready students, although full credit could be earned without students receiving any demonstrably marketable workplace skills or experiences. In 2022-2023, more Adobe Photoshop credentials were earned than the total number of all basic level credentials earned in Carpentry, Welding, Electrical, Millwright, HVAC, Heavy Equipment, Instrumentation, Pipefitting, and Machining combined. Further, because students who did earn advanced credentials earned significant “bonus” credit, every two students who earned an advanced credential offset one student who did not graduate from high school at all. This created a lack of transparency when considering whether schools are effectively preparing students for the workforce.

The revised accountability system asks the question “What percent of students are demonstrably ready to thrive after high school?” For each student, a successful college, career, or military experience serves as a way to indicate that the student will be ready to navigate life after high school. An affirmative answer to the question is independent of diploma pathway – a university-bound student might demonstrate readiness through a career credential or experience, and a career-bound student might demonstrate readiness through successful completion of postsecondary coursework. In this way, the revised system acknowledges CTE as an integral component of the high school experience, not a bonus. Just as a college student may need to work and a member of the workforce may later decide to pursue higher education, schools should offer quality CTE credentials and experiences to all students, and they should be valued equally to success in college-level coursework. The revised formula also expands the ways in which students can earn CTE credit for their schools

– in addition to advanced credentials, students can earn a Certificate of Technical Studies in a high-wage, high-demand industry; two years of a Fast-Forward-aligned Registered Apprenticeship; or a bundle of basic credentials that have been validated by the Louisiana Workforce Commission as valuable when grouped together. After the first eight years of implementation, a 106-hour internship will be required alongside an advanced credential or bundle of basic credentials, giving students a guided employment experience under their belts as they embark on future careers.

A key difference between the old and revised systems is that in the revised system, schools do not earn CTE acceleration credit when students earn basic-level credentials with limited value in the workforce. In other words, while students can still have access to credentials considered limited in postsecondary value, schools should prioritize offering high-quality, advanced credentials that will position students for competition and success in the workplace.

Programmatic shifts in how students are apprised of their options and scheduled into courses will enable schools to offer high-quality CTE experiences to all students. Investments already made in quality CTE programs will continue to be highly valuable. A variety of high-quality CTE courses should still be offered, with an emphasis on students successfully attaining valuable skills instead of on simply having access to a range of courses. Jump Start students are required to take 9 Jump Start pathways courses. Approximately 86% of Jump Start students took 6 Universal courses, and 54% of Jump Start students took 8 or more Universal Courses. Universal courses, by definition, are not directly aligned to a particular industry. LDOE is committed to working with schools and systems as they think through how to prioritize credentials and course sequencing that will most effectively position students for success.

If students are not proficient in math and English, they may struggle to understand technical concepts, follow instructions accurately, and communicate effectively in their CTE programs, ultimately hindering their success and employability in their chosen fields. Many CTE programs involve calculations, measurements, and technical specifications that require solid math skills, such as in fields like carpentry, welding, and HVAC. Additionally, strong English skills are necessary for reading and understanding technical documents, instructions, and safety protocols. With only 34.9% of high school students proficient in math in 2023, and only 44.1% proficient in English, it is easy to imagine the impact that proficiency can have on CTE.

As a critical component of the Louisiana economy and of CTE education, agricultural education will continue to be an essential part of quality CTE programs. A bundle of basic credentials centered on agricultural education, as well as advanced credentials and quality supervised agricultural experiences are valuable opportunities that schools can offer. LDOE is working with the Louisiana Agriscience Teachers Association to identify ways to support the development of effective agricultural education programs.

Art and music are – and will remain – required components of K-12 education in Louisiana, starting in the elementary grades. In high school, students can earn postsecondary credit for dual enrollment and Advanced Placement courses in music and the arts and IBCs in digital arts such as video production; and at all grade levels, the visual and performing arts should

continue to engage students and communities by offering opportunities for students to learn and express themselves.

C. Expectations of internship or college-level coursework for all students are unreasonable.

LDOE contends that the expectation is both reasonable and attainable. One identified fallacy is that internships will be immediately required or will be an extensive time investment on the part of employers. However, the internship requirement will be phased in through the first eight years of system implementation, and policy revisions regarding work-based learning have specified a minimum of only 106 work hours for a student internship. When coupled with the 26.5 hours of classroom experience, it totals the exact amount of time required for all other Carnegie Units. Currently, approximately 40.4% of Louisiana seniors have early release, which means they attend school for only part of the day and do not take a full course load. In other words, schools have unused, funded time during which students can reinforce academic skills or expand career skills. For students who know what they want to do after high school, an internship may be an opportunity to gain insight into the profession. For students who are undecided, an internship can afford them insight into key workplace etiquette and skills that will be transferable across professions. Every student should be able to experience a successful postsecondary class experience or a successful short-term workplace experience prior to entering life after high school. In order to do what is best for students, we must guide students into new opportunities. Providing internships or college-level coursework gives all students an opportunity to raise the bar. An accountability system should measure student outcomes and opportunities to ensure all students are given the opportunity to grow and succeed while in Louisiana schools.

D. Some students will be unable to reach full potential.

One might argue that the current system not only does not ensure students reach their full potential but also hides the extent to which potential goes unreached. LDOE contends that the revised formula will more accurately and transparently measure the degree to which schools are supporting students in reaching their academic and career potential. While the 2023 statewide performance score was a 78.5 B, a much deeper investigation is required to learn that only 43% of students in third through eighth grades and high school were actually proficient in ELA or English, and 32% in mathematics. Based on the 2021 American Community Survey of the census bureau, Louisiana has the second highest youth disconnected rate in the country, with 17.7 percent (96,000) of youth sixteen to twenty-four years of age neither in school nor employed, compared to 12.1 percent nationally. Additionally, the U.S. Program for the International Assessment of Adult Competencies Report shows that 27% of Louisiana adults have low literacy and 42% have low numeracy, well above the national average in both areas. Louisiana needs a more literate and numerate populace, and the revised system will more transparently report the state's progress toward that end. The following section will illustrate the ease with which the public will be able to ascertain key statistics, including the percentage of students that are growing academically and the percentage of students who have demonstrated proficiency in core subjects. Hidden compensation and bonus points will be eliminated so the public will see the extent to which schools are adequately preparing students to be successful members of society.

E. Unclear goals and moving targets for schools.

Contrary to the way the revised system has been labeled by some misguided stakeholders, schools and districts will not be graded on a “curve.” No school is destined to receive an F letter grade. The statewide target will actually be more clear – a 100-point goal instead of a 150-point goal, with a standard ten-point scale for letter grades. To phase in this scale and provide for opportunities to recognize growth and progress in school performance, a distribution will be applied only in fall 2024, prior to the implementation of the revised system, to set initial cut scores for letter grades. Those cut scores will remain in place – regardless of the number of F letter grades earned – until 50% of schools or districts meet the target score to earn an A or B letter grade. In the subsequent year, the target cut score will increase by five points and remain in place until 50% of schools or districts meet it. This process will continue until the cut score has reached a ten-point scale.

Acknowledging the different starting points for schools and districts, three separate scales will use this process – one for elementary and middle schools, one for high schools, and one for districts. The accountability scorecard will be published for each school and district to provide a transparent view of performance in each indicator. It is possible that one of the scales will reach the ten-point scale mark before the others. After a scale has reached the ten-point scale mark, it will no longer be adjusted regardless of the number of schools and districts that reach a particular letter grade.

The image below shows the way school and district performance will be reported under the revised accountability system. Louisiana’s Accountability Scorecard will display the percent of students that meet each expectation. No longer will students generate points for schools through complex math formulas and credentials of questionable value. In the revised system, each student is counted – the students are the point.

Louisiana’s Accountability Scorecard

% of Students GROWING		% of Students Who Are PROFICIENT		% of High School Students THRIVING	
Math		Math		Graduation Rate	
English		English		Ready based on a nationally recognized exam	
Math growth for lowest 25% of students		Science		Accelerated into college coursework, career training, or service	
English growth for lowest 25% of students		Social Studies			
English Language Acquisition (ELL)					
AVERAGE:					

While a system that used an annual curve to assign letter grades would likely advantage some schools, the revised system sets the statewide target at a ten-point scale phased in through gradual interval increases. Regardless of the makeup of the school and community, the expectation is that all students in Louisiana gain proficiency in core subjects and are prepared to thrive after high school.

II. Accountability Formula Design

A. Reduced transparency.

The former system is incomprehensible, rendering it useless to a public that needs to understand how its schools are performing. The revised system will dramatically improve in transparency. From reporting school and district scores on a 100-point scale instead of on a 150-point scale to ensuring more clarity in subgroup data, the system was designed to clearly report and differentiate school and district performance. The revised system is a simple, easy-to-understand way to report whether students are growing academically, whether they are proficient in core subject areas, whether they graduate, and whether they have demonstrated readiness to be successful after high school. A clear example is the way cohort graduation is reported. In the current system, schools earn points for graduating students according to a complicated formula that awards different point values for different percentages of a cohort that graduate. The revised system simply asks, “What percentage of students in the cohort graduated?”

Minimum n size. The minimum n size is the number of students that must be in a subgroup for data to be reported separately for that subgroup. To protect student privacy in very small subgroups, student data is reported as part of the school-level results but not as part of the subgroup-level results. The minimum n was raised from 10 to 15 in the revised system in response to stakeholder requests. System leaders argued that schools with very small populations of students were disproportionately impacted by the performance of these students.

The system actually increases transparency. While we increased the minimum n -size the revised formula, fewer students will be excluded from subgroup scores because all schools will receive a subgroup score as long as they have one indicator with 15 students in it; previously the school needed to have all indicators, significantly reducing the likelihood of receiving a score.

The following table summarizes the number of students in each subgroup and what percent of students would not receive a subgroup score because the number of students in the subgroup is below 15. It is important to note that the term “excluded students” refers to exclusion from subgroup reporting only. These students are still included in the overall school score.

	Total Participants	Number in school without a Subgroup score	Percent in school without subgroup score (revised system)	Percent in school without subgroup score (current system)
All Students	506669	31	0.01%	0.02%
Economically Disadvantaged	361536	42	0.01%	1.06%
White	216773	1633	0.75%	2.06%
Black or African American	204806	904	0.44%	2.32%
Students with Disabilities	65600	1390	2.07%	20.83%
Hispanic/Latino	49609	4643	8.56%	15.62%
English Learner	24816	4164	14.37%	29.75%
Asian	4807	3695	43.46%	52.33%
American Indian or Alaska Native	1331	1456	52.24%	61.12%

Graduation cohort. In response to stakeholder requests, the “lag year” in reporting graduation cohort data will be removed. In the current system, a full year of data validation occurs prior to the release of cohort graduation rates. Improved technology and processes will allow LDOE to process and return this data much more quickly moving forward. Reporting the 2024-2025 and 2025-2026 cohorts together emerged as a preferable solution to the obscurity of not reporting one of the cohorts at all or to the confusion of publishing two scores for each school and district with each of the cohort data separated.

Students with disabilities. There is no concrete support for the assumption that students with disabilities must also comprise the lowest 25% of students. The performance of students with disabilities as a subgroup will be included in each indicator. Further encouraging schools to prioritize support for the students with the largest academic gaps will give those students more optimal conditions for achieving their full academic potential.

Inclusion of ACT. ACT is not required twice. It is required that if a school wants credit for accelerating a student, the student needs to be ready before being accelerated. With 41% of Louisiana’s public high school class of 2021 requiring remediation in math, and 25% in English, it feels inappropriate to incentivize those same students for dual enrollment. Instead, the school should be focused on improving their college readiness or career readiness, which is what this indicator incentivizes.

Because acceleration pathways are distinct from graduation pathways, students with any diploma type can accelerate in either university, career, or military readiness.

Further, by aligning the ACT score required for university acceleration to the TOPS ACT requirement, students who intend to pursue postsecondary education but will need to work to support themselves will be more likely to complete high school experiences that prepare them for better workplace opportunities while in college.

B. Inconsistent English Learner (EL) weighting.

Schools have a responsibility to support ELs both in learning English and also in using English to demonstrate proficiency in academic content. The *Elementary and Secondary Education Act*, as amended by the *Every Student Succeeds Act*¹, sets certain requirements for accountability systems in order to receive certain federal funds. Proficiency on required annual assessments, graduation rate, and the progress of English learners toward achieving English language proficiency are examples of required indicators. Each indicator must allow for meaningful differentiation in school performance and must be valid, reliable, comparable, and statewide. Further, the weight of the required indicators must be substantial in relation to each other and, in the aggregate, must receive much greater weight than any optional indicators.

Because of these federal requirements, the EL progress toward proficiency indicator is weighted equally with the other progress and proficiency indicators. The indicator will not be included for schools with fewer than 15 English learners. LDOE understands that learning another language is challenging and has been working through the English Learner Task Force to identify additional support that is needed for schools to be able to effectively grow students to proficiency in the English language.

C. The system should expand options to demonstrate college readiness.

While the previous accountability system awarded points for certain student outcomes and allowed for low point-earners to be offset by high point-earners, the revised system promotes the idea that every student counts. The revised system abandons the “150 or 0” mentality for the much simpler “yes or no” mentality. Each student in a population either will or will not meet the expectation.

While some students who test poorly do successfully navigate college, the nationally recognized assessment indicator provides a transparent way to report how well Louisiana prepares graduates compared to other states across the country. This aligns with Act 635 of the 2024 Regular Legislative Session. The revised accountability system seeks not to explore individual outcomes but rather to report performance on clearly established metrics. Further, it is important for schools to ensure that students who earn college credit have also demonstrated proficiency with the concepts and skills determined essential for high school.

¹ *The Elementary and Secondary Education Act of 1965*: H.R. 2362, 89th Congress 1st Sess. Public Law 89-10 (4/11/1965) as reauthorized by the *Every Student Succeeds Act*: S. 1177, 114th Congress, Public Law 114-95 (12/10/2015).

It is also an overgeneralization to state that students who get a 19 on the ACT receive a zero in accountability. A student who graduates with an ACT score of 19 has additional opportunities to demonstrate assessment proficiency using WorkKeys or ASVAB as well as additional opportunities to demonstrate career acceleration.

D. The alternative school accountability system conflicts with the rest of the policy.

No changes were made to the alternative school accountability system. Because the former statewide accountability system will be repealed from LAC 28:XI after implementation transition is complete, the elements of alternative school accountability referenced in the sections of policy scheduled to be repealed have been included in the Chapter specific to alternative school accountability. Revisions to LAC 28:XI.Chapter 35 can be considered technical in nature.

E. §1709 conflicts with R.S. 17:3911.C.(5) regarding the changing of exit codes without concurrence of the city, parish, or other local public school system.

While §1709 does refer to the specific required documentation to support the use of exit codes by addressing exit codes that have been assigned without sufficient documentation, neither it nor LAC 28:XI.Chapter 41 to which it refers require the changing of exit codes without concurrence of the public school system. The revision to statute has been addressed procedurally, and policy is in alignment. This policy language is how the department fulfills its obligations under ESSA regarding cohort graduation rates by ensuring students are not improperly removed from the cohort per federal requirements. Documentation to support exit codes can be as simple as a written and signed statement from a parent or guardian in most cases. With substantive statewide concerns regarding truancy and drop-out rates, it is crucial to ensure that schools make every effort to not drop students from rosters without evidence that the student is continuing education via other means. Regarding the value of state diplomas as compared to the value of diplomas issued by BESE-approved nonpublic schools, the Louisiana Constitution states in Article 8, Section 4, that a “certificate issued by an approved private school shall carry the same privileges as one issued by a state public school.”

III. Implementation Concerns

A. Lower school and district grades under the revised system will diminish the public’s trust in the school system.

While it may be difficult to recalibrate the way school, district, and state performance is measured, having a simpler and more transparent way to report statewide progress in achieving educational outcomes for students is a worthy endeavor. Further, the Louisiana workforce needs well-prepared graduates who have the literacy, numeracy, and technical skills required for high quality jobs. In the engagement LDOE has been conducting with employers throughout the state, the consensus has been supportive of ensuring students have demonstrated proficiency with fundamental skills in communication and problem solving that are reasonable expectations of high school graduates. School systems will need to engage with their communities if a significant change in performance scores is expected once the revised system becomes effective in Fall 2026.

To support communication with key stakeholders in advance of the release of the revised system, LDOE will provide simulated scores in Fall 2024 and Fall 2025. This will provide ample opportunity to communicate with and educate the community about what the revised accountability system measures and how schools and districts are performing. LDOE is also creating resources curated for a variety of audiences to support understanding and communication. Further, LDOE and BESE staff are touring and will continue to tour the state to inform the public on accountability adjustments and the need to support local school systems.

B. Checkbox mentality and higher cost of CTE.

In 2023, in Louisiana only 43% of students in third through high school were proficient in ELA or English, and only 32% of students were proficient in mathematics. If schools approach every student demonstrating proficiency in content as checking a box, students will have better opportunities for success after high school. The indicators in the revised accountability system are beneficial targets for schools and districts to pursue.

Both BESE and the Louisiana legislature recognize that offering CTE courses often requires a more substantial investment of funds. In Louisiana, the Career Development Fund (CDF) provides an additional funding source specific to CTE courses, and six percent of the annual Minimum Foundation Program appropriation also goes to support CTE. Further, federal Perkins funding is available to support CTE program development. While each funding source carries its own specifications for allocable activities, schools and systems can braid these funds to cover the cost of CTE.

Additionally, many school systems are currently testing students in several IBCs. Many of the most popular IBCs tested have little alignment with industry demand or may test on foundational technical skills gained in the middle grades. The proposed basic bundles of the revised system aim to help build an organizational structure to bundle highly valued technical skills that are aligned to economic demand. The five basic bundles that have already been approved were developed collaboratively with business leaders and economic development partners.

The most popular IBCs earned in 2022-2023 are: S/P2 Automotive Service Safety and Automotive Service Pollution Prevention (8200), Customer Service and Sales (5154), Adobe Certified Professional Photoshop (4981), Microsoft Office Specialist (MOS) Word Associate (4905), ServSafe Food Handler Certification (3744), Microsoft Office Specialist (MOS) PowerPoint Associate (3591).

C. Internship barriers.

LDOE has been heavily engaged with key stakeholders, including the Louisiana Workforce Commission, local chambers of commerce, regional economic development offices, and businesses, in identifying and developing solutions for barriers to student internships. Guidance targeted to specific audiences is in the final stages of development and will be released in the fall and winter. Further, BESE and LDOE are working with external partners to

host a series of events around the state to promote awareness, share solutions, and resolve any additional barriers that may exist. With examples such as Exxon’s internship program, appropriate opportunities for internships can be made available in businesses and industries that also have prohibited job classifications/occupations. Based on minor work permit data, there are over 7,600 businesses identified as employing people under the age of eighteen. All parishes are represented in these data, but not every parish has a work-based learning program in place. 48 parishes have students employed with Construction, Manufacturing and/or Fabrication/Machine Shop employers. There is untapped potential.

D. Lack of clarity regarding basic bundles.

The process for identifying basic bundles begins by consulting each industry sector regarding the highly valued skills and credentials aligned to the skills in each profession. Approval by the Louisiana Workforce Commission’s Workforce Investment Council rounds out the approval process. Five basic bundles have now been approved, with five additional basic bundles currently in development and expected to receive approval by the end of 2024. As a further point of clarification, advanced credentials are not required to “link” to basic bundles. The current state focus list has approximately 51 advanced credentials. The state focus list, by design, is updated regularly in order to be responsive to industry demand. This includes adding credentials in emerging industry sectors as well as removing oversupplied credentials. Additionally, the LDOE is working with state agencies to identify in-demand credentials based on job posting data. This important work will ensure that new credentials can continue to be developed and offered in alignment with workforce needs and that credentials becoming less valuable or heading toward obsolescence can be removed from the focus list, when appropriate.

The process for developing basic bundles underscores one of the key reasons that the revised accountability system has been supported by the LWC and LABI – more effectively preparing students will support the transformation of the Louisiana economy to meet the needs of the future.

E. The change is too quick and too drastic.

Every year of delay results in more students negatively impacted by the old system. The LDOE has spent years engaged in conversation about the need to revise the school accountability system to ensure it meets the needs of students. While the simulated data regarding projected school and district scores does indicate a drop in the stated districts, the investments these districts have made in CTE will be advantageous in facilitating simple programmatic shifts that can support their reaching the targets. For example, a district that offers Basic Tech Drafting and allows students to earn the Autodesk AutoCAD certification could make simple adjustments to respond to student progress and allow completion of the Autodesk Inventor Certified User exam during the same course. Districts that have invested resources in making these courses available typically already have the infrastructure in place to shift programming in support of accelerating student achievement of career credential goals. To expand access to internships and Certificates of Technical Studies, school systems should look at their

current course progressions to identify CTE content that provides diminished value and repurposing teacher talent and time in the student's schedule towards an internship or early access to technical college credit opportunities. Based on the 2021 American Community Survey of the census bureau, Louisiana has the second highest youth disconnected rate in the country, with 17.7 percent (96,00) of youth sixteen to twenty-four years of age neither in school nor employed, compared to 12.1 percent nationally.

F. Unrealistic expectations for time during the school day.

The LDOE contends that it is indeed reasonable to expect schools to meet the instructional needs of students during the school day. In response to Act 771 of the 2024 Regular Legislative Session and increased focus on actions needed to close academic gaps for students, the LDOE is developing updated staffing and scheduling guidance. Further, LDOE is working directly with districts to support them in creating school schedules that maximize the use of both staff and instructional time in support of strategic instruction that best supports student growth. Reviews of the district plans submitted thus far in response to R.S. 17:100.13 do not reveal significant challenges in structuring the school day to provide students with additional support, when needed, in ELA and math.

IV. Assessments

A. The system should include only the minimum number of assessments required by ESEA.

Louisiana values students' ability to reason and engage with social studies skills including knowing history and thinking critically. While this does exceed the federal mandate for assessment, the LDOE is committed to reducing testing time while also ensuring that what we are assessing reflects the priorities of the state. Any adjustments to reducing the amount of time students spend being assessed can easily be implemented within the revised accountability formula.

B. Issues with the current state assessment.

The school, district, and state accountability system is independent of the statewide assessment used. Louisiana is required to have a standardized statewide assessment, and the assessment currently used is LEAP 2025; ultimately, any assessment will align to our state standards. If the selected assessment changes in the future, no changes will be needed to the accountability system itself as the system asks whether students are proficient, and if they are making meaningful annual progress toward proficiency.

C. Expectations of proficiency are unreasonable.

Accountability systems are required by ESEA to measure proficiency on annual statewide assessments. BESE policy in LAC 28:XI.6113 defines proficiency as scoring Mastery or Advanced on the statewide assessment. Proficiency is further described in policy with the statement that students performing at this level have met college and career readiness expectations and are prepared for the next level of studies in the content area. In other words, the goal for students is that they would be ready for success without support at the next level. Students scoring Basic, by definition, are likely to need additional support to be academically successful in the subsequent grade level. Recognizing that a score of Basic may represent

significant work on the part of both educators and students, schools earn credit for students scoring Basic when this score represents growth for the student. By building in a significant portion of the accountability formula dedicated to recognizing student growth, schools can be recognized for the work they do in growing students, especially those starting with significant academic gaps. For the most struggling students, a score of Basic may even be doubly counted by recognizing that score in both the ELA or math growth indicators as well as in the growth indicators for the lowest-performing 25% of students. For students with the most significant cognitive disabilities, alternate standards may be applied by the student's IEP team if the student meets certain criteria.

D. Questions about the CLT.

The Classical Learning Test (CLT) is an emerging assessment with heavy usage – to date – in Florida. It is a standardized assessment that emphasizes critical thinking and problem solving. Passages are drawn from classical literature and historical texts, and many colleges and universities in the United States accept CLT scores. This assessment provides a different opportunity for students to demonstrate proficiency in academic content. The concordance scores in §1711 of the revised policy are set near the 59th percentile ranking for average national scores on each assessment type and the equivalent of a 20 - 21 on the ACT.

E. Increased emphasis on third grade.

The end of third grade marks a transition from learning to read to reading to learn. Ensuring that students can read on grade level will support their success across content areas in subsequent grade levels. Third grade proficiency is statistically a strong predictor of postsecondary success.

V. Process and Communication

A. More input should be solicited.

The LDOE and BESE have spent years engaged in conversation about the need to optimize our school accountability system to ensure it meets the needs of students. Planning for a revised accountability system has been ongoing since 2020. Those plans centered on developing a plan for students in grades K-2, updating the state's growth measure, enhancing the value of career and college readiness, and raising student expectations. In 2022, Louisiana adopted the state's first accountability plan to measure success in kindergarten through second grade. BESE also considered revisions to the grade 3-12 accountability plan in 2022. Public input on accountability revisions has been sought across numerous meetings since 2020 such as BESE, Accountability Council, Superintendent's Advisory Council, and the BESE accountability work group. In addition, the LDOE received over 8,000 responses through a public survey this past spring.

B. Concerns about the intent behind the revised system.

Louisiana wants to raise the bar for academic success, enhance the value of career education, and make it easier for the public to understand how schools are performing. Louisiana's previous accountability system was criticized for being too complex for parents, educators and

the public to understand; setting low expectations for improvement and postsecondary success; and being outdated in how it failed to value career and college readiness. The revised system asks simple questions and gives straightforward answers. What percentage of students grew in English and math? What percentage of students have demonstrated proficiency with core subjects like science and social studies? What percentage of students graduated on time? What percentage of students are career and college ready? These are clear measures of what we know matters most to academic success.

C. Additional clarity and communication needed on several points.

The LDOE will continue to make communication to students, families, and educators a priority throughout the process. In addition to soliciting input from stakeholders during the avenues mentioned in part A of this section, the LDOE has also utilized many of those same meeting structures to provide in-depth walkthroughs of the revised accountability system. Since this past spring, the LDOE has held over a dozen meetings with stakeholders to provide a walkthrough of the revised system and answer any questions. In August, the LDOE hosted special webinars to preview the revised system and provide implementation guidance to central office staff, teachers, counselors, elementary school principals, middle school principals, and high school principals. These seven webinars were attended by over 1,400 education professionals. The LDOE has launched a landing page on its website dedicated to the revised accountability system (www.louisianabelieves.com/accountability). This landing page includes a video preview of the revised system, frequently asked questions, guidance documents, and additional resources. This landing page will be continually updated as new resources and information become available. The LDOE will continue to utilize its main communications channels to keep school systems informed. This includes the System Leaders Monthly Call, LDOE Weekly Newsletter, monthly office-specific calls, weekly office hours, and special events such as Teacher Leader Summit, counselor workshops, and other professional learning opportunities.

LDOE Recommendation

The LDOE recommends proceeding with the adoption of the Notice of Intent as a final Rule.