



Public Affairs Research Council of Louisiana, Inc. P.O. Box 14776, Baton Rouge, LA 70898

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July 17, 2012

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

Dear Superintendent White:

Thank you for your interest in considering ideas and recommendations as you develop accountability policies for the implementation of Act 2 of the recent legislative session. The Public Affairs Research Council of Louisiana, which has encouraged a number of education reforms and school accountability standards over the past decades, is optimistic the new law will make a positive impact on the overall quality of education in our state.

Louisiana over the years has made progress with education reforms, including the push for accountability in the late 1990s, the expansion of pre-K education and charter schools, and better measures of school performance. A variety of programs on both the state and local levels have helped improve the state's graduation rate and have reduced the number of dropouts. The changes in the recent legislative session could build on that foundation and keep Louisiana headed in an upward direction. That type of success will best be achieved if state leaders and policymakers evaluate each new program objectively over time and are willing to make changes that may be necessary to provide an effective and trustworthy education system.

The challenge now is to create accountability methods so that taxpayers can be confident their money is being well spent and that progress can be measured. As a way of judging schools, parental choice is important. But parents need good information and reliable comparisons to make good choices. In addition to the parents, the students and the rest of the state have a stake in the educational success of Louisiana's children as well. At the same time, care must be taken not to regulate the nonpublic schools in ways that are unnecessarily burdensome.

These decisions should be made in a transparent manner. This is all the more important considering the short time frame for finalizing the accountability policies, which for Act 2 must be completed by Aug. 1. The Board of Elementary and Secondary Education (which has called a meeting for July 24, 2012) and the education committees in the Legislature should be afforded an opportunity to hear a presentation

of the anticipated or draft policies before the new standards are finally implemented. Although your department is not primarily responsible for calling those meetings, PAR urges you to make this step possible in time to incorporate input from these public bodies.

We do note the recently released DOE rules for nonpublic school participation in the Louisiana scholarship program. We are glad to hear that a second set of rules addressing academic accountability is forthcoming. The initial criteria assign broad powers and responsibilities to your office to disqualify nonpublic schools from the voucher program for a variety of reasons, including "endangering the academic welfare, health or safety of children." For schools meeting certain thresholds of voucher enrollment expansion, the rules allow the state to consider a school's "demonstrated capacity to effectively serve" students.

These rules give broad authority to the Superintendent to respond to situations where children could be harmed or when unethical behavior has occurred. The Superintendent, using his own criteria and judgment, can prevent participation by schools that are unprepared to teach. The rules also give your office license to curb program participation in schools with low rates of continued enrollment of voucher students. While this rule would appear to emphasize the worthwhile goals of retaining students and discouraging schools from establishing a practice of rejecting voucher recipients who are struggling to learn, it is unclear when this rule might be triggered.

The rules so far do not provide a system for identifying or dealing consistently with nonpublic schools that might fail to offer a quality education. Please consider this aspect of accountability in your second set of rules. Let the nonpublic schools operate independently, but provide ways to determine if they are failing the students and to phase them out of the voucher program if they cannot improve. Schools with higher proportions of voucher students should be subject to greater accountability. Voucher student performance on state standardized tests, and their progress over time, is one good measure of a school's performance. Student retention and progress toward high school graduation are also important considerations in determining whether a school is succeeding in the program. If voucher students are performing at grade level and are less likely to drop out, then the school should be given credit. Parents should be allowed to compare this information across public schools and schools participating in the voucher program, as much as federal regulations will allow for such comparisons.

The state should consider what happens when a student performs poorly on a state-mandated test or fails to stay at grade level. In the public school system, remedial measures are in place, including summer school programs for those students who fail high-stakes tests. In the voucher program, no remedial action is prescribed. At a minimum, the nonpublic schools should have in place a clear plan for remediation and should provide that information to prospective parents of scholarship students. Many of the nonpublic schools already have remedial action plans in place for their regular students, so this disclosure should not be seen as an extra burden. The state should consider the additional step of allowing parents of 4th or 8th-grade voucher students to take advantage of the appropriate public school district summer remediation program if their children fail the state mandated test that year. This step would put the children first, ahead of institutional and territorial considerations.

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On a more minor note, for the sake of clarity and keeping everyone on the same page, PAR would encourage you in your ongoing public discussions to help explain a few concepts and terms related to these reforms that sometimes may be misunderstood outside of your department. One of these is Act 2's reporting requirement of schools' "aggregate average proficiency" on state assessments. In fact, the law contains a number of DOE reporting requirements, which could be explained in context and used as a starting point for the next set of rules on accountability policies. Also, the voucher law requires an independent audit of the participating nonpublic schools to verify the proper expenditure of public funds; to the extent that you can clarify that these audits are limited to safeguarding public money and are not reports examining the overall financial condition of a nonpublic school, that would be helpful.

PAR has long been a proponent of effective voucher programs. If implemented fairly and transparently, vouchers could give a lift to thousands of students seeking a new educational opportunity. Your next step putting this program in place is a critical one for the students and for the integrity of the reform effort. Thank you for your attention to these suggestions and observations.

Sincerely,



Robert Travis Scott
President
RTS:an

cc: Representative Steve Carter, Chair, House Education Committee
Senator Conrad Appel, Chair, Senate Education Committee