

Little Rock School District Exit Plan
End of Year Report
Submitted by: Stacy Smith, Deputy Commissioner

The Little Rock School District (LSRD) has made satisfactory progress during the 20-21 school year to meet exit criteria that was established following reconstitution.

The exit criteria focused on developing coherence between both the District and individual schools, so that teachers and administration established a new baseline understanding of high-quality instructional approaches and curricular expectations. The newly elected Little Rock School Board began meeting in December 2020 and, shortly after, ratified the exit criteria. Each month, the LRSD school board and Superintendent Mike Poore have dedicated time to the components surrounding the exit criteria. While the local board may have been in disagreement regarding Level 5 authority of the state, they did, as a board, acknowledge the work the district was doing to be the right work. LRSD board members continue to ask questions and learn about the critical work in these identified areas. The below documentation reflects the commitment of educators and the LRSD school board to continuous school improvement.

Under the leadership of Superintendent Mike Poore, there has been a shift from primarily district-orchestrated decision making to greater school level empowerment and accountability for continuous school improvement. The deputy superintendent and the three executive directors have been instrumental in providing a clear expectation and framework around professional learning communities, teacher feedback, and literacy. They have been responsible for maintaining the expectation of progress, while providing support to local school administrators and educators throughout the district. The amount and intensity of support from DESE has consistently decreased over the past year due to LRSD satisfactorily making progress in identified areas.

In May, the Office of Coordinated Support and Service (OCSS) visited each school site in LRSD and had the opportunity to visit various classrooms throughout the district. During this time, they conducted 242 LRSD educator interviews specific to the exit criteria. The OCSS also interviewed 16 principals and asked the administrator to provide or show evidence to support statements in the interview. These interviews further supported the documentation of work that had been provided throughout the year.

The following foundational exit criteria is the basis for LRSD exiting Level 5 support.

The four main areas of focus in the plan are derived from the High Reliability Schools (HRS) Framework and are a continuation of current work. The areas are as follows:

- Collaborative teams regularly interact to address common issues regarding curriculum, assessment, instruction, and the achievement of all students.
- The school provides teachers with clear, ongoing evaluations of their pedagogical strengths and weaknesses that are based on multiple sources of data and are consistent with student achievement data.
- The school literacy curriculum and accompanying assessments adhere to state and district standards.
- The school manages its fiscal, operational, and technological resources in a way that directly supports teachers to provide a safe, supportive and collaborative culture and increase student achievement.

Rating Scale: The following rating scale was established to assist in communicating and determining progress for each area of criteria and objectives established. A <u>score of 3 or better</u> would be satisfactory.

- 4- Met The District has met the foundational expectation of the objective or criteria independently
- 3- Making Satisfactory Progress The District has made significant progress on the objective or criteria
- 2- Partially Met- The District has met some of the objective criteria, but not at an adequate level
- 1- Not Met- The District is not on track to meet the objective without significant action given towards the objective or criteria.

Criteria 1: The District will Implement PLC Processes and HRS Levels 1, 2 and 3			
Artifacts: LRSD District Leadership will monitor implementation through Focus Walks, Instructional Rounds and during Level Meetings.	Presentation Date	Responsible Party	
 Evidence- Beginning of the Year: HRS/PLC Implementation and Sustainability Plan MET/4 Master schedules that provide time for collaborative teams to meet weekly MET/4 Stakeholder perceptual data Guiding Coalitions identified MET/4 	District Leadership Team: March 2020 DESE: May 2020 PPC: June 2020 CAB: February 2020 LRSD Board Ratification: December 2020 (Work Session)	Randy Rutherford, Darian Smith Support: Jeremy Owoh, Hope	
 Evidence- Mid-Year: Collective Commitments established/articulated/agreed on MET/4 Common Meeting Norms adopted and followed for all meetings Making Satisfactory Progress/3 Four critical questions are focus of meetings and agenda items Making Satisfactory Progress/3 What do we want students to learn? (curriculum) 	Due to DESE by December 1, 2020	Resource: Solution Tree Marzano Resources	

- How do we know if students are learning? (assessment)
- How will we respond when students don't learn? (intervention)
- How will we extend learning for students who are already proficient? (extension)

Mid-year OCSS Comments: There is sufficient evidence that the District has embraced the professional learning communities model and has established foundational expectations, as well as support systems for various buildings who are at different stages of implementation. The District leadership team has modeled the expectation of functioning within the parameters by setting collective commitments and norms. When interviewing executive directors for mid-year reports, comments centered around the "common language" and "guiding coalitions" within the District and notable progress of specific schools. Some schools began the professional learning process on their own several years ago and are further along, the past two years the state has supported several school teams with PLCs. However, it's important to note that the District, on its own, has intentionally planned professional learning for all schools around the Professional Learning Communities model and High Reliability School model. The District also invested in building leadership capacity by providing PLC professional development to all assistant principals and principals.

The District provided evidence of collaborative teaming, norms, collective commitments, and agendas for all schools within the District.

Next steps: The district needs to continue promoting and supporting the implementation of the PLC model. While the foundational elements of PLCs have been established within the district, the real work comes in the authentic collaboration between educators about essential standards, common formative assessments, student data, instructional practices, etc. Administrators and classroom teachers will continue to need support to move from a PLC structure to a model of functioning as a collaborative professional learning community.

Evidence-End-of-Year:

- Development of essential standards identified for literacy and math MET/4
- Process of identifying learning targets/proficiency scales has begun Making Satisfactory Progress/3
- Mission and/or Vision Document that indicates a focus on learning at high levels for all students MET/4
- School goals are focused on learning Making Satisfactory Progress/3
- Leadership teams with process for including teacher input; examples of decisions that teachers helped to make

June 2020

around school improvement; Making Satisfactory
Progress/3
Feedback loops created to allow for authentic stakeholder
input Making Satisfactory Progress/3

End-of-Year OCSS Comments: The district has met Criteria 1 by providing evidence of implementation of Professional Learning Communities and High Reliability Schools Level 1, 2, and 3 processes. The criteria that was established within this plan is foundational. While not every school is at the same place with PLC or HRS implementation, all schools have implemented the foundational core tenets of PLCs as outlined in the exit criteria. Some schools in the district have even been recognized for implementation of advanced work. Four schools submitted applications and were selected to participate in the state supported PLC pilots working towards model schools. Two schools within the district have met the certification requirements by Marzano and Associates for Level 1 & 2. LRSD has a districtwide professional development plan to support the continuation of the Professional Learning Communities and have actively participated in state supported conferences and Regional Networks.

- 235 educators were asked about essential standards for math and literacy, 98% indicated that they were aware and could provide information pertaining to these essential standards. It was also noted that essential standards for science, social studies and elementary fine art have also been established.
- 242 educators were asked about a set time for collaborative meetings, 98% confirmed that there was a set time for collaborative meetings within all the schools. Many were able to provide schedules and share work done during these times.
- 66% of the educators were able to describe several examples of student data utilized during collaborative meetings, while 33% were able to provide minimal student data examples.
- Several principals indicated they were making an effort to be actively involved in attending the collaborative team meetings with their teachers. They stated that the work with Solution Tree has really helped them to understand collaborative team work and expectation, but that they still had a long way to go in using this time effectively.

Criteria 2: The District will implement TESS and LEADS systems.		
Artifacts: Data from Focus Walks, Instructional Rounds and <i>EdReflect Insight Reports</i> .	Presentation Date	Responsible Party

 Evidence-Beginning-of-Year: TESS and LEADs Guidance Document MET/4 TESS/EdRefect Recalibration for AdministrationMET/4 TESS/EdReflect recalibration training provided to certified staff by principal or designee MET/4 TESS/EdReflect training for novice teachers and included in onboarding plan MET/4 Updated TESS 4-Year Rotation Cycle for current year (COVID-adjusted) PGPs are updated/developed in EdReflect MET/4 Closed by October 1st "Additional Artifacts" is open for documentation of PGP progress MET/4 	District Leadership Team: January 2020/July 2020 DESE: May 2020 PPC: August 2020 CAB: August 2020 LRSD Board Ratification: December 2020 (Work Session)	Lead: Randy Rutherford, Darian Smith Support: Jeremy Owoh, Rocci Malone, Brent Miller, Hope Worsham, Building	
 Evidence-Mid-Year: * Focus Walks in place of EdReflect Average of 8 weekly informal observations per building administrator as evidenced by EdReflect Insight Reports Making Satisfactory Progress/3 Evidence of quality feedback from observations of principal/teacher interactions or documentation from Ed Reflect Making Satisfactory Progress/3 Evidence of PGP updates between building administration and certified staff members MET/4 	Due to DESE by December 1, 2020	Resource: Bloomboard	

OCSS Comments: This is the fourth year for the District to have utilized the TESS and LEADS framework within the District. The District has implemented and completed all professional development for this school year pertaining to the framework and supports around TESS. The District has implemented an expectation of a minimum of 8 weekly informal observations per building administrator providing quality feedback. District level administrators are routinely checking EdReflect and following up with building level administrators on their observations. During interviews, the conversations centered on improving the quality of feedback for teachers. This will add to a more robust feedback loop and meet the intentions of informal observations for continuous school improvement. The District has also created a set of district-level "focus-walk" tools that are personalized by building. District-level administration and specialists utilize the observational tool to provide feedback to building-level administrators and verify the progress the District is making in Science of Reading and building level "look fors". The District has created a system of support for their schools by placing them in three tiers of support. Schools in Tier III have more frequent focus-walks and additional support provided by the district.

Next Steps: The structure for an effective implementation of TESS and LEADS has been set up within the district. District administration needs to continue to monitor and support school administration in

supporting teachers with effective and timely feedback to improve instruction. The focus walk tool and tiered support structure the district has set up is reasonable and if used with fluidity has the potential to identify and provide the needed support to school administrators at the right time. Therefore, decreasing the risk of a school falling through the cracks within a large school system.

Evidence-End-Year:

- Average of 8 weekly informal observations per building administrator MET/4
- Evidence of quality feedback from observations of principal/teacher interactions or documentation from Ed Reflect Career Summative Making Satisfactory Progress/3
- Evaluations completed and data reviewed with administrators making decisions regarding employment, assignment, and support for teachers based on data.
 MET/4
- Evidence of PGP review between building administration and certified staff members on the non-career summative track Making Satisfactory Progress/3

Due to DESE by June 1, 2021

End-of-Year OCSS Comments: OCSS team conducted 16 principal interviews specific to the exit criteria. During these interviews, principals shared EdReflect documentation and/or focus walk data. Time was spent discussing types of feedback provided to teachers and examples of types of feedback was shared with OCSS. It was evident that district leadership has maintained an expectation of 8 weekly informal observations per building administrator. This was shared in multiple conversations with both district and building administrators. EdReflect indicated the majority of school administrators had met the expectation. Some administrators shared getting a visit or call from their supervisor when not meeting the expectation of informal observations and feedback.

- 92% of 241 educators interviewed indicated that feedback was regularly provided from building leadership.
- 160 elementary teachers, 88% of those interviewed indicated that they received individual feedback regarding the science of reading implementation.

The district has made progress towards quality feedback for teachers, but recognizes this is an area for continuous improvement. That was supported by the additional comments made during interviews with educators. Some indicated the feedback improved the quality of their craft, while others indicated it was reflective only and that they needed more prescriptive feedback.

It is worth noting that most teachers expressed confidence or trust in their building administrator and felt that they were supported by school administration. Teachers were comfortable with the principals

frequently visiting the classrooms and providing feedback.

• 88% of the 234 responses indicated that there is a system in place for stakeholder input regarding building level decisions.

Artifacts: School Level Plans and District Plan of support that outlines the curriculum, resources and PD that aligns with the science of reading and the demonstrated needs of the districts' students; Data from Focus Walks; Lesson Plans	Presentation Date:	Responsible Party
 SoR training for certified staff occurring as scheduled with minimal disruptions to student learning (Adjusted due to Covid) Making Satisfactory Progress/3 Assessor training for supervisors occurring as scheduled (Adjusted due to Covid) Making Satisfactory Progress/3 SOR Teaching practices occurring in all K-2 classrooms and documented by the focus walk data Making Satisfactory Progress/3 	District Leadership Team: July 2020 DESE: August 2020 PPC: August 2020 CAB: August 2020 LRSD Board Ratification: December 2020 (Work Session)	Lead: Hope Worsham Support: Stacy Smith, Jeremy Owoh, Kiffany Pride, Randy
 Winter NWEA data- testing completed MET/4 Focus walk data Making Satisfactory Progress/3 DESE SoR implementation feedback Making Satisfactory Progress/3 Screening process for students who show a need based on Winter NWEA data 	Due to DESE by February 1, 2021	Rutherford, Darian Smith Resource: Textbook Vendors

OCSS Comments: Due to COVID-19, the District had some delays in Science of Reading professional development. However, they adjusted and worked with the ADE Literacy unit to reorganize and provide the necessary training. The District has stayed committed to SoR literacy core components and has had to recreate and utilize new digital curriculum available to support literacy instruction for their teachers and students. The District specialists and teachers have created digital literacy units to support the newly

adopted literacy materials from last year.

At least 50% of teachers have finished a SoR Phase I pathway, while another 30% are currently in a SoR cohort. The District also has at least one administrator from each building in SoR Assessor Academy and are on track to be able to assess in the Spring. Educators who are not in a pathway have been notified and the district is following up with each one to determine next steps.

The District continues to improve the level of their dyslexia services and have hired an additional district level dyslexia specialist to support schools.

Next Steps: The District will continue to work with the DESE literacy team as needed to create the needed capacity for the district to meet the needs of their teachers in regards to the Science of Reading. Literacy and dyslexia specialists need to continue to create or identify the digital curriculum needed to support students and teachers.

Evidence-End-of -Year:

- Spring NWEA Data Testing completed MET/4
- Focus walk data from DESE about the SoR implementation MET/4
- Placement for dyslexia services as appropriate for any student showing a need based on screening. Making Satisfactory Progress/3

Due to DESE by June 1, 2021

End-of-Year OCSS Comments: Despite COVID-19 LRSD has maintained implementation of new elementary literacy programs during the 20-21 school year. The Division of Elementary and Secondary Education (DESE) literacy team in the spring supported the district by organizing Science of Reading (SoR) focus walks with LRSD administrators. The DESE staff provided feedback and support to building level administrators as they visited classrooms to strengthen their skills in recognizing SoR instructional strategies in the classroom. They specifically worked on providing feedback to teachers regarding SoR. The SoR walk-throughs were appreciated and principals asked for the district to continue this support for building level administrators. LRSD responded by organizing another follow-up day with LRSD literacy staff and administrators.

OCSS team and DESE literacy team identified evidence of SoR instructional strategies and resources (e.g., decodable text, sound walls located at front of the room, syllable types posters, morphology posters) throughout the district's elementary schools during multiple visits. The consistency of a guaranteed and viable curriculum was evident as OCSS staff moved from one building to another. Many noticed similar lessons and materials in the same grade levels, but at different buildings. Strong evidence that the district pacing guides and curriculum alignment is being utilized.

• Of the 159 elementary teachers interviewed, 98% indicated that the literacy curriculum is aligned

- to the science of reading and is being implemented
- Elementary teachers consistently expressed confidence and satisfaction with the results in FUNdations and the Heggerty curriculums that are utilized to teach phonics and phonemic awareness.
- Elementary teachers provided mixed reviews regarding the Wit and Wisdom curriculum (comprehension, vocabulary). Some liked the program and topics, while others stated the text was too rigorous. Text difficulty has been expressed by other districts using Wit and Wisdom as a first year challenge, but that years 2 and 3 implementation was better with familiarity and continued educator support. LRSD has already scheduled additional curriculum support for Wit and Wisdom for teachers this summer and in the fall.

LRSD has established a districtwide identification and assessment system for students with characteristics of dyslexia. The district is providing dyslexia intervention at all levels within the district. This is a great improvement from the LRSD dyslexia report 2 years ago. The district has hired additional staff and a dyslexia specialist to coordinate services and outline procedures within the district and continue to make improvements. The district coordinators participate in monthly meetings with the DESE Dyslexia Specialists for support.

 93% of the 234 teachers interviewed could describe the system in place to identify students in need of dyslexia interventions. Elementary teachers were more versed in the identification process, but secondary teachers were aware of the dyslexia procedures in the building, who their contact person was, and interventions that were to be implemented with identified dyslexia students.

Several middle school teachers expressed that SoR and dyslexia professional development was provided, but that it was overwhelming with a lot of new information. They expressed the need for additional time and support to feel confident moving forward. However, the expectation that secondary teachers have an awareness of SoR was met. Some educators referenced incorporating morphology instruction into their lessons. In the high schools, there was evidence of a focus on vocabulary, and an expectation for certain instructional expectations to be displayed in every classroom; ie. learning objectives posted, standards being taught, how they were going to learn the objective (Do), and vocabulary connected to the learning objective.

Science of Reading within the state has primarily been a focus for K-6. That is true for LRSD as well, but there is most definitely an awareness in middle and high school.

Criteria 4: An approved budget that is not deficit spending

Evidence Folder

Artifacts: Budgets, projections	Due Date	Responsible Party
A 3 year budget projection for long term sustainability of the district is developed in consultation with DESE and approved by the local board and Secretary of Education. Not Met	District Leadership Team Approval: August 2020 Presentation to DESE: August 2020 Presentation to PPC: August 2020 Presentation CAB: August/September 2020	Lead: Kelsey Bailey Support: Mike Poore, Greg Rogers, Donna Adkins, Cynthia Smith, Randy Rutherford,
Mid-Year Review of Year 1 Budget that meets criteria- Not Met	Due to DESE by January 2021- Board Packet Review by LRSD Board by January 2021- Done	Darian Smith Resource: Jack Truemper, Stephens

OCSS Comments: The district budget was created at the beginning of the year based on expenditure and revenues from the previous year, as well as the current COVID situation and decline of enrollment. There is a greater impact on student enrollment in the primary grades by COVID-19 in LRSD.

While presenting the budget to the state, the district did lower projected revenue amounts from tax collection, Pre-K, and ALE in 2020. The beginning of the year budget did show deficit spending in comparison to the previous year. During the presentation, LRSD shared areas of concern and potential reductions that could be considered, the

LRSD has reduced some programs and personnel the past six years, while maintaining a fairly stable, but declining student population. These reductions in the past have primarily been due to lack of property assessment appreciation, loss of desegregation funding, and declining enrollment. These factors have created a need to continue developing feasible plans to reduce the District overall expenditures. In interviews with the executive directors, there was an awareness of overstaffing, duplicative high school programming, and low numbers at several schools in the district.

Next Steps: DESE will continue to work with LRSD in the spring to create a projected 3 year budget.

End of Year Review of Year 1 Budget and adjustments for Year 2 identified. Making Satisfactory Progress/3

Due to DESE by **April 2021**

ALL AMOUNTS ARE CUMULATIVE			
FISCAL YEAR	REVENUE INCREASES	EXPENDITURE SAVINGS	AVAILABLE FUNDS
FY 2021 TOTAL	\$ 10,471,495.30	\$ (10,903,969.54)	\$ (432,474.24)
FY 2022 TOTAL	\$ 11,968,092.89	\$ 6,589,827.00	\$ 18,557,919.89
FY 2023 TOTAL	\$ 12,732,589.96	\$ 6,390,000.00	\$ 19,122,589.96
FY 2024 TOTAL	\$ 16,310,800.71	\$ 7,100,000.00	\$ 23,410,800.71

The Little Rock School district has submitted a 3 year operating budget, describing expecting revenue increases and savings. For FY21 the district's operating budget does show a declining balance. However, this can be justified by one-time expenditures of construction from Southwest High School and architect fees for K-8 school at McClellan. The negative operating balance of \$432,474.24 will be covered with the district's fund balance.

The district will receive over ninety-nine million in one-time federal ESSER funds which may be used for maintaining operations and budgetary shortfalls through December 2024. While the district has the opportunity to strengthen their fiscal solvency with the federal funds, they must continue to make decisions regarding staffing ratios and facilities. The district has created proposals for increasing teacher pay and facility improvements, both rely upon the extension of the debt service mills and continuous monitoring of overstaffing. The ESSER funding does allow the district to begin absorbing positions through attrition without having to enforce a reduction in force. While opportunity exists, it doesn't go without caution to recognize the use of one-time funds and not obligate these funds for expenditures or programs that extend beyond the 2024 school year.

Detailed 3 year Fiscal Governance Projections

Summary Justification provided by Chief Financial Officer Kelsey Bailey

The Little Rock School District Board and Administration is continually reviewing and dissecting every facet of LRSD's operations to identify potential savings and utilization of resources to achieve maximum operational efficiency. This dissection includes exploring changes in staffing at all levels, academic programs/interventions, revenue utilization, facility maintenance/upgrades, utility usage, human capital needs, etc.

Our budgetary focus is on fiscal solvency and sustainability. There is a conscious effort to address the areas of Revenue Utilization, Staffing/Human Capital, Current & Future Facility Needs, Salary Schedules and Minimum Fund Balance as it relates to the current budget and subsequent fiscal years.

Our overall fiscal goal is to achieve the greatest operational efficiency possible while still providing a high quality and equitable education to all our students as well as attracting and retaining the most competent team members.

We realized that this is not an easy task, but we are preparing to make the necessary changes to right-size our District operations in order to stay financially solvent and educationally focused. We owe this to every student, employee, parent and tax payer of Little Rock School District.

FISCAL YEAR 2021

LRSD adopted a budget this fiscal year that projected a general operational deficit of \$5,777,790. This deficit was primarily due to very conservative projections of local tax revenue collections due to Covid-19 and expenditures associated with the completion of Little Rock Southwest High School.

The current revenue projections are expected to come in approximately \$9.8 million over budget, which makes up for the original deficit. Estimates for indirect cost recovery from ESSER I & II are approximately \$650,000 which also assists with the original deficit budget

Salary & benefit expenditures are expected to come in approximately \$3.5 million under budget and the District was able to reallocate approximately \$2 million of Covid-19 related operating expenditures to ESSER II funding, which will create additional savings.

The Debt Service Mills Extension of 2020 failed to get voter approval in November 2020. LRSD had plans to pay for FFE for the new LRSWHS (\$4.2m) and architect fees for K-8 school at the McClellan site (\$2.0m) using these bond funds. LRSD had to utilize operating funds to finish out these projects. In total, the District had approximately \$16.4 million of unfunded one-time capital improvement costs in fiscal year 2021.

FISCAL YEAR 2022

LRSD is projected to receive an additional \$3.5 million of local tax revenue. This increase is based on LRSD's property assessment increasing by 2.0%. The average appreciation has been 3.0% over the past five years. LRSD is also estimating to earn \$500,000 of indirect cost recovery revenue from ESSER II.

State Foundation funding is expected to decrease by \$4.7 million due to the decline in ADM from the 2020/2021 school year, but some of this decrease will be offset by an estimate of \$2.8 million of Declining Enrollment funds. In subsequent fiscal years this loss will be \$4.7 million, unless enrollment increases back to pre Covid-19 level.

LRSD is projecting general operating fund savings of \$6.6 million. This includes a reduction of certified positions and utilization of ESSER II funding for some operational expenditures.

Combining all of the above creates cumulative available operating funds of approximately \$18.6 million as compared to fiscal year 2021.

FISCAL YEAR 2023

LRSD is projected to receive an additional \$3.6 million of local tax revenue. This increase is based on

LRSD's property assessment increasing by 2.0%. LRSD is also estimating to earn \$500,000 of indirect cost recovery revenue from ESSER II and ARP ESSER.

LRSD has very preliminary savings of \$2.8 million that can be achieved by additional right-sizing of staffing at buildings.

Combining all of the above creates cumulative available operating funds of approximately \$19.1 million as compared to fiscal year 2021.

FISCAL YEAR 2024

LRSD is projected to receive an additional \$3.6 million of local tax revenue. This increase is based on LRSD's property assessment increasing by 2.0%. LRSD is also estimating to earn \$500,000 of indirect cost recovery revenue from ARP ESSER.

No expenditure savings have been identified at this time but will be determined at a later date. District will have to address the "funding cliff" for ESSER II and ARP ESSER.

Cumulative available operating funds are estimated to be \$23.4 million as compared to fiscal year 2021.

Criteria 5: An approved Master Facility plan

Evidence Folder

Artifact	Due Date	Responsible Party
Master Facilities Update with funding plan is approved by the local board and Secretary of	District Leadership Team Approval: October 2020	Lead:
Education. This will align with any standing Desegregation Settlements and inclusive of	Presentation to DESE:	Kevin Yarberry
Magnet/Specialty Schools. MET/4	November 2020	Support:
	Presentation to PPC:	Kelsey Bailey, Tlm
	November 2020	Cain, Mike Poore, Randy Rutherford,
	LRSD Board Ratification: January 2021	Darian Smith
	January 2021	Resource:
End of year review of progress toward implementation of Facility Plan. MET/4		Jack Truemper, Stephens
The Master Facilities Plan was approved for 2020		