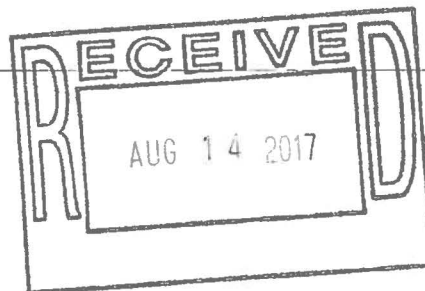


BALTIMORE COUNTY PUBLIC SCHOOLS

Verletta White ♦ Interim Superintendent ♦ 6901 North Charles Street ♦ Towson, MD ♦ 21204

August 10, 2017

Mr. Andrew R. Smarick, President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201



Dear Mr. Smarick:

Upon review of Maryland's Consolidated State Plan Draft #2 to implement the Every Student Succeeds Act of 2013 (ESSA), it is evident that a great deal of time and effort has been invested in the development of the document, and Baltimore County Public Schools (BCPS) certainly appreciates the opportunity to provide feedback on the plan.

Academic Achievement and Other Academic Indicators Strengths

1. The emphasis on student growth in the elementary and middle schools is an imperative. It underscores the importance addressing the needs of every student irrespective of their placement on the proficiency scale.
2. The formation of achievement composite scores also supports the systemic monitoring of changes in achievement across the range of performance levels rather than overemphasizing proficiency. This, too, supports planning for all learners at all levels of proficiency.

Questions/Recommendations

Growth:

1. While the plan recommends that the state use Student Growth Percentiles as a measure of growth, student growth percentiles are known to correlate with student achievement (<http://onlinelibrary.wiley.com/doi/10.1111/emip.12144/full> or https://www.cde.state.co.us/accountability/cgm_sgp_frl_brief). This undermines the independence of the interpretation of growth from achievement. For this, and other reasons, Student Growth Percentiles have come into question. We would respectively ask that value-added modeling be considered as an option for measuring growth instead. Neither modeling technique is transparent, but value-added modeling has been demonstrated to be independent of student attributes and does not require that differential targets be developed based on student attributes.
2. In addition, the use of value-added methods would allow the extension of growth modeling to high school and advanced math in middle school.

3. Finally, we share the concerns outlined by Frederick County tied to the establishment of growth to standard. As outlined by Frederick County, there has been a well-documented mode effect in the first years of the administration of PARCC. How will estimates of growth and growth standards take into account the mode of assessment? How will growth to standard encourage growth for students across the entire range of the assessment?

High School Mathematics:

1. BCPS shares the concern articulated by Montgomery County Public Schools regarding high school math. Without an effective alternative, we will have accelerated students who simply will not be able to meet the federal requirement of taking a specific math assessment in high school. In addition, with the variability in acceleration across LEAs in the state, will comparisons of mathematics achievement at the high school level be equitable and valid? While English 10 allows for a full cohort comparison across schools and systems, the absence of a full cohort comparison in mathematics makes the composite score for mathematics at the high school level hard to meaningfully interpret.
2. This requirement also runs counter recent legislation (*More Learning, Less Testing Act*) that aims to reduce the overall assessment burden for students. Advanced students would, under the current plan, be required to take an additional test in high school which would not be connected to their eligibility to graduate and would not support college admissions. BCPS would ask that MSDE allow local systems the flexibility to adopt the PSAT, SAT, AP, IB or similar assessments to meet this requirement.

English Language Proficiency

Strength

1. BCPS fully supports the elevation of the measurement of language acquisition in the accountability model and the differentiation of language acquisition expectations based on English Language Proficiency and time in system is consistent with research and experienced practice.

Question/Recommendation

1. In the proposed scoring for English Language Proficiency (ELP), the plan proposes calculating points based on a percent of the whole. This would appear to be inconsistent with the Annual Measurable Objectives (AMOs) outlined in the plan. BCPS would suggest that the scoring for ELP be established by assigned scores that are aligned to the escalating AMO expectation. As things stand, a building that met the AMO in 2020 would achieve only half of the points on this metric. Aligning the assigned scoring to the AMO schedule would ensure that buildings with English Learners would have the opportunity to achieve the full points for the ELP indicator without having to double the performance needed to hit the AMO.

School Quality or Student Success

Strengths

1. BCPS fully supports the use of a climate survey as a measure of school quality. Our system has engaged in an annual stakeholder survey for several years, and we incorporate that work as part of our school planning process. Climate is an essential component to be considered in every school.
2. BCPS also believes that access to a well-rounded curriculum is essential for students at all levels and appreciates the effort to articulate this within the draft plan.

Questions/Recommendations

1. Will local systems have the opportunity to include their own items within the climate survey? BCPS (as other systems have also indicated) has its own survey which has been rigorously developed and refined. It would be beneficial to maintain continuity in the constructs and in some of the items as we move forward with this important work.
2. As suggested by Montgomery County, BCPS would prefer to administer this survey locally and to submit the results to MSDE. We have a robust survey platform that has a documented history of managing the volume of the responses that would accompany this activity.
3. While we certainly recognize the importance of attendance, we share the concerns expressed by several respondents regarding focusing only on chronic absenteeism. Would this inadvertently draw attention away from improving attendance for all students? Rather than focusing only solely on chronic absenteeism, we would suggest dividing this metric with equal weighting for: (a) the proportion of students meeting a 95% attendance threshold, and (b) an assigned score based on the proportion of students who are chronically absent. We believe that this would incent improvements in attendance for all students.

Ranking of Schools

Strengths

1. The Maryland State Department of Education has produced a draft plan that provides a broad set of metrics that would adequately capture and reflect much of the complexity of school environments.
2. We believe these metrics will allow for a substantial differentiation of schools and, more importantly, will support planning to make improvements in any school.

Questions/Recommendations

1. BCPS shares the concerns of many regarding the five-star ranking system. As indicated by MSEA, the five-star is essentially synonymous with an A-F ranking which was precluded by the *Protect our Schools Act of 2017*.
2. While we are pleased with the transparency of a 100 point scale, we have an outstanding question regarding the points associated with English Language

- Proficiency. If schools do not have English Learners, will they automatically receive the 10 points for this indicator? If so, this raises concerns about the comparability of schools serving English Learners and schools that do not.
3. A similar concern emerges connected to the incorporation of equity. While BCPS unequivocally supports equitable outcomes for all students, it would appear that the model proposed by the State would be biased in favor of homogenous schools. The incorporation of equity, outside the model, in a deficit mode (only potentially subtracting from the final performance of a school) is problematic.
 4. The *Protect our Schools Act of 2017* specifically mandates that the composite score for schools incorporate a methodology that compares schools with similar demographics. As outlined above, we are concerned that the composite score on a 100 point scale fails to meet this objective if it is calculated in the same manner for schools serving ELs and schools that do not. Likewise, the assignment of stars (and their removal for equity) also runs counter to the law. We believe, as outlined in law, that schools should be compared to schools with like demographics.
 5. Finally, while the *Protect our Schools Act of 2017* advocates for the use of percentile rankings for schools, we would suggest that this be de-coupled from any final summative score associated to the school. Assigning rankings based upon the bell curve essentially ensures that the distribution of the school ratings will remain stable at the State level over time. Ideally, all schools should be able to achieve the highest rating; the application of a bell curve ensures that they cannot. We believe that it is important, instead, to be able to communicate performance against expected standards over time as articulated by the Public School Superintendents Association of Maryland.

Thank you for the opportunity to provide feedback on the second draft of Maryland's Consolidated State Plan to meet the requirements of Every Student Succeeds Act of 2013 (ESSA). I appreciate your ongoing consideration and action upon stakeholder feedback as we seek to provide a robust and transparent accountability system for our schools.

If you have questions regarding the feedback provided by BCPS, please do not hesitate to contact me.

Sincerely,



Verletta White
Interim Superintendent

cc:

- ✓ Dr. Karen Salmon, State Superintendent of Schools
- Members, Board of Education of Baltimore County