August 8, 2017

Mr. Andrew R. Smarick
President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smarick:

Thank you for the opportunity to provide feedback related to Draft #2 of the State Plan to implement the Every Student Succeeds Act of 2015 (ESSA) on behalf of the Cecil County Public Schools.

1. Given the concern around excessive testing, Cecil County Public Schools works to make the most of those assessments we choose to give and values assessment results which are timely and relevant to classroom discussion. An over-reliance on PARCC data in Draft #2 creates a disconnect between what is valued at the LEA level for improved student performance, and what PARCC currently offers. We prefer less weight given to PARCC assessments and more given to those assessments that provide immediate feedback to teaching and learning.

2. The Five Star Ranking System is too similar to the letter grade model that ranks schools from a grade of A through F. School rankings should provide information to the community that reflects a summary of individual students' progress. As currently presented, there undoubtedly will be a clustering of schools whose challenging demographics will result in their poor classification; concurrently, those schools serving more affluent students will remain at the highest level of performance and ranking.

3. The current Draft #2 places too much emphasis on English Learners (EL) for those systems and/or schools who have a small number of these children. Their performance on PARCC will disproportionately impact the overall accountability rating. Here too, measuring the simple growth of all students is the preferred measure by which schools should be rated.

4. Cecil County Public Schools supports using PARCC for school accountability purposes, but recommends that additional assessments like the SAT, IB, or AP also be used to determine college and career readiness.

5. We believe that the attendance rate should be included along with the chronic absenteeism measure, and that students who are chronically ill, and unable to attend school, should be excluded from the measure.
6. We support the gradual increase in achievement targets over a period of ten years to improve student success in all subgroups. This model is reasonable and provides structure and predictability to LEAs working to plan for improved achievement.

7. We fully support the role of school climate surveys in all schools and LEAs. Furthermore, we encourage the state to allow for LEA development of these surveys so that the surveys reflect their unique community makeup. There is a need for some level of uniformity and approval from the state level, but LEAs need the flexibility to provide their own instrument.

8. We recommend that the proposed accountability model articulated in Draft #2 be applied to current LEA and school PARCC data in order to provide an idea of how it will function. Ultimately, all stakeholders want to see such an accountability model serve as leverage for school and system improvement. The ability to examine how past data applies provides a snapshot of how it might be used by stakeholders.

Sincerely,

Dawn K. Branch
President
Cecil County Board of Education

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cc: Dr. D’Ette W. Devine, President of PSSAM and Superintendent of Cecil County Public Schools
    Ms. Renee McGuirk-Spence, Executive Director of PSSAM
    Dr. Karen B. Salmon, State Superintendent of Schools