

Cara Jackson
11401 Commonwealth Dr. #302
Rockville, MD 20852
July 3, 2017

Dr. Karen Salmon
State Superintendent of Schools
Maryland State Department of Education
200 West Baltimore St.
Baltimore, MD 21201

Dear Dr. Karen Salmon:

I have thoroughly reviewed the Maryland's ESSA Consolidated State Plan Overview from June 2017 and responded to the online survey. I had several thoughts as I reviewed the plan, and since the survey did not include comment boxes, I have included this feedback below.

Thank you for the opportunity to provide feedback on Maryland's ESSA plan.

Sincerely,

Cara Jackson

Cara Jackson

MD ESSA plan

- Page 10: an n-size of 10 is still very small. The plan says it “provides an acceptable level of statistical reliability and validity” but how do you know that? Nora Gordon’s Brookings post demonstrates how states might combine across grades or years – that way you’d be able to include more American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander students. <https://www.brookings.edu/research/how-state-essa-accountability-plans-can-shine-a-statistically-sound-light-on-more-students/> Furthermore, using averages instead of the percent proficient would improve both reliability/precision and privacy protection.
- I appreciate that the achievement gap will never close unless lower-performing groups improve at a faster pace, but I am concerned that the accountability system creates disincentives for educators to work in schools that predominantly serve lower-performing groups. Imagine two hypothetical schools: School A serves predominantly White students, while School B serves predominantly Black students. If Schools A and B make the **same** gains in percent proficient – say 2% more students are proficient – School A is on track with progress goals while School B is behind, because schools serving predominately Black students would *have* to outpace the gains of a school service predominantly White students to achieve satisfactory progress. The laudable goal of increasing the pace of improvement for lower-performing student groups may well be perceived as unfair to teachers and schools, and may discourage teachers from working in schools that serve large proportions of students in lower-performing groups. Moreover, if two schools are making similar gains, presumably what they’re doing is equally effective. If we identify one of those schools as making insufficient progress, we run the risk of replacing a reasonably effective approach with new interventions that may or may not work. Maybe the message to districts in this case needs to incorporate that information – if the school is making reasonable gains, it may be that the best course of action is to extend the day or year so that students have more time to benefit from that approach.
- Based on the figure on page 14 it appears that “annual measurements of interim progress” will be based on proficiency rates. While establishing ambitious proficiency goals is important, measuring progress through proficiency rates is ill-advised, because percent proficient can distort perceptions of growth. See Andrew Ho post on the problems with proficiency rates. <https://www.gse.harvard.edu/news/uk/15/12/when-proficient-isnt-good>
- “Additional measures of school and LEA performance beyond those in the formal accountability system would be included on a public report card to provide further insight and comparative data to the public” is vague. Which measures? The ones in the Appendix starting on page 88. How do you define “school and LEA performance”? Proficiency rates in part reflect the relative advantage of students served by school/LEA. You need to measure growth if you want to assess quality in the sense of the school/LEA actually *causing* gains.
- The graduation targets on page 15 raise the same concerns as the proficiency targets – you expect more of schools serving larger proportions of certain subgroups. Again, it’s admirable that we’ve set these ambitious goals, but I think the state needs to think about how this is messaged to LEAs and schools. I think the state should be cautious about penalizing a school

that's showing progress, even if that progress is not as fast as we'd hope. The state could play a role in identifying and highlighting interventions and programs that seem most promising.

- Page 18: in addition to consulting with CCSSO, the state might want to discuss with the districts. Montgomery County has done several evaluations focused on students receiving ESOL services and may have some ideas on early identification of students at risk of not exiting within 6 years.
- Page 20 (and page 88): median student growth percentiles are a decent measure of growth. I assume the switch to growth-to-standard is simply to address the language USDOE provided. Growth-to-standard tells you whether students are on track, but so do proficiency rates – so essentially the change to growth-to-standard would mean that academic achievement consisted of two pieces of information that answer the same question. The question of whether the school contributed to growth is better addressed by median student growth percentiles. I understand that you need to meet the requirements of USDOE, but would advise communicating to districts regarding what questions are answered by growth-to-standard vs. SGPs, and I strongly support the continued use of SGPs. The state should advise LEAs to take SGP information into consideration as they develop interventions for identified schools. Don't throw the baby out with the bathwater – if a school is making reasonable growth, but that's not sufficient because they serve low-performing students, then LEAs might want to expand rather than replace the approaches or interventions that are currently in place. *Note based on information on page 29: since only the lowest 5% of schools are identified this isn't necessarily going to be an issue – assuming that lowest 5% also has low SGP.
- Page 26: is “academic growth” measured by SGPs or growth-to-standard? My strong preference is to use SGPs. If the state uses growth-to-standard, then essentially the percent proficiency determines 45% of the score, and we lose useful information about school growth. I would also switch the weights of chronic absenteeism and access to a well-rounded curriculum, since the latter is more within the control of the school.
- Just to reiterate...I'm guess the lowest 5% of schools also have low SGP, but if for some reason they don't, it would be wise to consider whether some of their approaches are actually working and build on what does seem to be working, rather than attempting an entirely new approach. This seems more likely to come up with the schools identified for targeted support and improvement rather than the lowest 5%.
- Page 32 notes that schools that do not meet the 95 percent threshold for participation in required assessments will be identified as a targeted support school. I am concerned that this use of the term “targeted support” is part of why LEAs/schools view this less as “support” and more as a punishment. If there is some kind of penalty for lower participation, state the penalty rather than referring to it as support. Also, consider whether the penalty should be imposed against the school or the student/parents.
- “the MSDE will develop a resource hub that contains evidence-based interventions, effective practices, research articles, rubrics, templates, planning documents, and other items that support the identification, implementation, and assessment of evidence-based interventions.” – this is my favorite thing in the plan. Does MSDE have rigorous evidence of the effectiveness of the training programs that CSI educators will be required to attend? If not, perhaps these schools should be required to choose from a list of evidence-based interventions such as

MyTeachingPartner (see What Works Clearinghouse for a review:

<https://ies.ed.gov/ncee/wwc/Intervention/801>).

- On page 40, the plan mentions “evidence-based strategies such as Career Academies, Middle College High School, Talent Search, and Check and Connect.” Middle College High School earned an effectiveness rating of 0 from What Works Clearinghouse, and Check and Connect did not have any studies that met the empirical standards of What Works Clearinghouse. The strategies with the strongest evidence base are Career Academies and Talent Search.
- One suggestion for personalized professional learning for teachers (page 47) is to pair teachers within a school based on performance evaluations; this relatively simple and low-cost intervention has had promising results in Tennessee (Papay et al 2016 <http://www.nber.org/papers/w21986>)

Survey Questions

- Regarding the State-Approved online Teacher Preparation Program, I think this is needed but should be limited to critical needs areas (e.g. special education, English for Speakers of Other Languages, science, math, and technology) and/or to paraprofessionals seeking teacher certification.
- Regarding question 16 about how effective various approaches are to increase equitable access to effective teachers – effectiveness of recruitment efforts depends on whether these efforts generate an effective and diverse group of teachers. I’m not aware of any rigorous empirical evidence around the use of regional centers, so I did not feel able to respond. Similarly, for question 18 I don’t know of research on the effectiveness of various resources with regard to English Learners, though in theory it seems reasonable to believe that preparing teachers to work with these students would be an effective approach. There are several programs reviewed by What Works Clearinghouse that demonstrate effectiveness for English Learners.