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July 19, 2017

Dr. Andrew Smarick
President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Dr. Smarick:

On behalf of the Public School Superintendents Association of Maryland (PSSAM), I would like to thank you for the invitation to present before the Maryland State Board of Education. As President of PSSAM, I very much appreciate the opportunity that Dr. Theresa Alban and I were afforded to engage in meaningful dialogue and to exchange information directly with you and the members of the State Board.

PSSAM supports the Maryland Consolidated State Plan on ESSA with modifications. Our concerns center around six specific areas. They are as follows: Five-Star Rating System, Over Identification of Schools, Composite Score Methodology, Use of Assessments, Chronic Absenteeism, and Well-Rounded Curriculum. As a follow-up to our recent discussion, I have attached a detailed summary of PSSAM's position on these issues that further defines our collective input.

We recognize and applaud the efforts of the Maryland State Department of Education (MSDE) and the Maryland State Board of Education to solicit feedback and recommendations regarding Maryland's Plan. We look forward to resolving the issues raised by our twenty-four local superintendents, and moving forward with the submission of an outstanding Maryland Consolidated State Plan on ESSA.

Once again, we appreciate the opportunity to communicate directly with you, and we look forward to working together on these issues and others that may arise. Please do not hesitate to contact me with any questions or concerns regarding PSSAM's position relative to the proposed ESSA plan.

Sincerely,

D'Ette W. Devine

D'Ette W. Devine, Ed.D.
President, PSSAM *and*
Superintendent
Cecil County Public Schools

Cc: Dr. Karen B. Salmon, Maryland State Superintendent of Schools
Maryland State School Board Members

Attachment

FEEDBACK REGARDING MARYLAND'S CONSOLIDATED STATE PLAN – ESSA

July 24, 2017

FIVE-STAR RATING SYSTEM

PSSAM fully supports having a rating system for our public schools, but we believe that setting the accountability standards using performance level descriptors for each rating level is a more effective option.

We are apprehensive about the use of the five-star rating system. We believe that the general public will quickly translate the five-star ratings into letter grades. Using either 4 or 6 rating levels may remove the A, B, C, D, F comparison that currently exists in the five-star rating.

In addition, schools will be rated with stars in various areas (i.e., academic achievement, academic progress). It may be difficult to explain how a school achieved a cumulative star rating based upon their areas. Also, if a school fails to meet a subgroup target, the school would lose a star. This may not be transparent on how the data is reported. We recommend the reporting aspect to include if a school met or did not meet a particular target rather than using the five-star rating system.

PSSAM would like to state that Illinois and Massachusetts have excellent models of the rating systems that we prefer over Maryland's five-star rating system.

OVER IDENTIFICATION OF SCHOOLS

PSSAM appreciates that the State Board is trying to establish Maryland as a state that recognizes school improvement as a focus for all low performing schools. However, based on the fact that the schools will be determined through a relative comparison to all schools based on the academic performance and progress indicators, it is not clear how many non-Title I schools will fall into this category. Since ESSA requires the identification of 5 percent of the lowest performing Title I schools, we have concerns as to how the state will support the additional non-Title I schools and what resources will be made available. If the state cannot provide additional resources and supports for all schools that are identified in this category, then we question the over identification of schools. We believe that all students in schools that are identified as low performing should benefit from the additional resources that would be the result of the increased funding that will be received by Title I low performing schools.

COMPOSITE SCORE METHODOLOGY

Senate Bill 871, Education – Accountability - Consolidated State Plan and Support and Improvement Plans (Protect Our Schools Act of 2017), requires that the composite score established incorporate a methodology that compares schools that share similar demographic characteristics including the proportion of economically disadvantaged students, as defined by the state in accordance with federal law.

PSSAM is concerned about compliance with Senate Bill 871. We fully understand that demographics are a critical factor in determining the educational success of a school, specifically the proportion of economically disadvantaged students. However, in our review of the ESSA draft plan, PSSAM finds no mention of a comparison of like schools, as required by law under Senate Bill 871. A comparison of like schools should be made accessible and easily available to the public.

USE OF ASSESSMENTS

At the elementary and middle school levels, PARCC scores constitute 45% of the school's model as measured by proficiency and student growth. However, at the high school level, PARCC scores are only 20% of the school's model since there are no growth metrics at the high school level. The weights are not consistent across all levels as the weights are much higher at the elementary and middle school levels. As such, PSSAM recommends that MSDE review the percentages at the elementary and middle school levels as only two PARCC assessments would comprise nearly half of a school's ratings.

Superintendents also discussed the challenge of using Student Growth Percentiles as a way to measure growth. The concept can be difficult to explain easily to the public. The metric also does not provide information that teachers could easily translate into instructional improvement. If a school does not perform well with the Student Growth Percentile, how will MSDE support the school in making improvement in that area?

Finally, PSSAM was disappointed to see test scores being used as a measure related to "well-rounded curriculum." This indicator gives the state an opportunity to highlight the importance of the arts, physical education, and other elective courses. It is an opportunity to highlight key areas that Maryland has deemed important for graduation, like environmental literacy and service learning. We are opposed to using test scores as a way to measure "completion of a well-rounded curriculum" and including this as a measure of academic progress.

CHRONIC ABSENTEEISM

PSSAM has concerns with the shift from schools being required to attain a 94% attendance rate to only measuring chronic absenteeism. In many cases, a student who is chronically absent may have serious medical reasons. Currently, there is no provision to exempt students with serious medical issues. We fear that focusing only on chronic absenteeism may lead school administrators to lessen concern about the overall attendance rate and students who miss less than twenty days of schools.

PSSAM therefore recommends that this metric be revised to "**Absenteeism**" and weighted as 10% instead of 15%.

We also recommend that 5% of this metric include schools meeting the attendance rate of 95% and the remaining 5% to include students chronically absent with the provision that students with severe medical issues not count against the school provided proper documentation is provided to MSDE.

WELL-ROUNDED CURRICULUM

PSSAM fully recognizes that access to a well-rounded curriculum is a critical equity measure that is vital to the success of our students. Maryland has a long history of requiring a variety of courses that provide a well-rounded curriculum for students and we believe this is an important indicator of school quality/student success However, local superintendents believe that the State Board should consider the following adjustments to the criteria.

On the elementary level, “passing” is the term used to show academic progress. PSSAM believes it is important to note that not all elementary schools are using grading for their students.

On the middle school level, academic progress credit is given for passing only core content areas. Why were the arts, physical education and health not included as they were in elementary school? It will also be important to define what is meant by the term “computational learning” used in this indicator.

On the high school level, PSSAM felt the indicator should mirror the graduation requirements in COMAR. These requirements reflect Maryland’s commitment to a well-rounded curriculum for all students. If the State Board wants to include the opportunity to participate in AP or Dual Enrollment, should it also be considered to include the opportunity to participate in band, chorus, or theatre? What about participation in sports?

Finally, PSSAM would suggest that this indicator offer an opportunity for the State Board to consider ways to encourage innovative strategies or research-based strategies, such as Arts Integration. How could schools be recognized for the positive things occurring in their school that may not be represented in the current indicators?