

Regarding "Readiness for Post-Secondary Success" you say:

"A preliminary study of Maryland data, where available, indicates that these measures are valid, reliable, and allow for meaningful differentiation in school performance."

This is hardly credible in view of this recent op ed:

<http://www.baltimoresun.com/news/opinion/oped/bs-ed-op-0807-franklin-high-20170804-story.html#nt=oft03a-1gp3>

It is patent that your criteria do not cover such invaluable acquired skills as effective parenting, community organizing and stabilization, or maintaining adequate standards of work in a complex real world that does not focus exclusively on academic performance. To define readiness for post-secondary success in exclusively academic terms is wrongheaded to the point of silliness. If that was your own definition you should change it; if it was forced on you by the act, you should be creative enough to find ways to incorporate other measures.

Regarding "Annual Meaningful Differentiation" you say:

"Maryland will use a five-star system for the category determination. The methodology for assigning the stars is currently under study. Stakeholder feedback indicated the desire for a meaningful system under which only schools that truly meet Maryland's standards for excellence would be awarded the top category, and schools in the lowest category unambiguously fail to meet those standards."

This is a set-up for discrimination against schools and students in impoverished or unstable areas. None of the criteria you have mentioned would in any way acknowledge the additional challenges they face or the extraordinary work some of them do in meeting those challenges. It is your responsibility to see your assessment is honest and does right to those schools and their students. This will be watched, and if necessary challenged. Education is about far more than passing academic tests, and educational assessment must be also.

Regarding "More Rigorous Interventions" you say:

"The CSI schools that fail to meet exit criteria in three years will receive more rigorous interventions. The MSDE will lead implementation of intervention strategies at identified schools. The MSDE will convene an external stakeholder group to review the root cause analysis and revise the action plan. Significant staffing, scheduling, and programmatic changes will occur as a result of the revised action plan.

"Local school superintendents will be required to make staffing changes based on recommendations from the MSDE and the stakeholder team. This will include assigning experienced and effective administrators and teachers to CSI schools identified for more rigorous interventions. Principals will be required to use the MSDE leadership coaches. Leadership coaches will meet regularly with school principals to provide guidance on the implementation of school improvement strategies. Principals, assistant principals, and teacher leaders will be required to participate in targeted professional learning experiences identified by the MSDE to address the unique needs of low-performing schools. School leaders will be held accountable for implementing resources and strategies provided during professional learning experiences. Data will be analyzed to determine necessary modifications to school schedules, course offerings, instructional material, and other programmatic revisions."

This is arrogant folly from start to finish. Your "experts" for the most part have no experience in stressed communities, your required changes in staffing will disrupt good programs and supportive relationships, and your required participation in "learning experiences" will take staff time away from the proper business of helping students. If you persist in this, I will call on the legislature to prohibit such heavy-handed, witless interventions.

Finally, your proposals for family outreach are grossly inadequate, geared to the middle class. Poor people seldom have time, and sometimes not adequate computer access, to deal with your so-called "one stop" parent portal. You need to solicit ideas from schools that have been successful in engaging the community (something you have not bothered to include in your measures of school success).