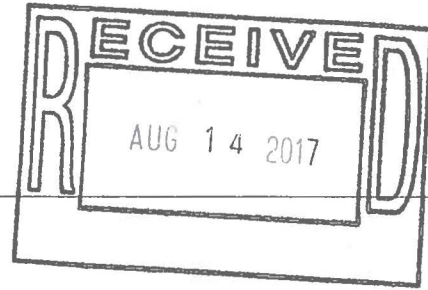


Kevin M. Maxwell, Ph.D.
Chief Executive Officer

August 8, 2017



Karen B. Salmon, Ph.D.
Maryland State Superintendent of Schools
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Dr. Salmon:

On behalf of Prince George's County Public Schools (PGCPS), I want to thank you for the opportunity to provide feedback and comments as it relates to the implementation of Maryland's accountability system as outlined in the draft Every Student Succeeds Act. As my colleagues and I have expressed our insights through different representing parties, I will again share some of those same concerns that exist for my district.

We support the inclusion of professional development support for Pre-Kindergarten teachers as a part of Title II and the increased monitoring for our English Language Learners through Title I and Title III. Knowing that support of each LEA is evident to execute successfully the goals established by the State Education Agency, please find comments below from my team.

FIVE-STAR RATING SYSTEM

PGCPS 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 than using the five star rating. We believe that the communities' lack of knowledge and misguided interpretation of the five star rating system could lead to a conversion equal to a letter grade system. Using a rating system that does not have five components may assist in removing the tendency to align the rating system with letter grades. In addition, by using this rating system in various areas of academic achievement and academic progress, it may be difficult to explain how a school achieved a cumulative star for a particular rating. I 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.

USE OF ASSESSMENTS

We understand the use and need of assessments as it relates to student growth but there appears to be inconsistencies in how we examine students in elementary school and middle school as compared to high school. At the elementary and middle school levels, PARCC scores comprise 45% of the school's established model as measured by proficiency and student growth. However, at the high school level, PARCC scores represent only 20% of the school's established model since there are no growth metrics at the high school level. Based on this information, we recommend that MSDE review the higher percentages at the elementary and middle school levels as only two PARCC assessments would comprise nearly half of a school's ratings.

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CHRONIC ABSENTEEISM

Absenteeism is an area that is monitored throughout our school system. We are concerned about shifting from schools being required to attain a 94% attendance rate to only measuring chronic absenteeism. We know that many reasons exist for students to be considered chronically absent, including but not limited to serious medical reasons. In the current model, no provision exists that allows LEAs to excuse students with medical conditions.

Therefore, we recommend that 5% of this metric include schools meeting the attendance rate of 95%. The remaining 5% to include students chronically absence but with the provision that students with severe medical issues (providing proper documentation) are not counted against the school's attendance rate.

In conclusion, thank you for the opportunity to share my concerns relative to Maryland's ESSA Plan. I welcome any discussion of the points included this letter as we work to build and execute this very important issue of Maryland's ESSA Plan.

Sincerely,



Kevin M. Maxwell, Ph.D.
Chief Executive Officer