

# BALTIMORE CITY PUBLIC SCHOOLS

**Catherine E. Pugh**  
*Mayor, City of Baltimore*

**Cheryl A. Casciani**  
*Chair, Baltimore City Board of  
School Commissioners*

**Dr. Sonja Brookins Santelises**  
*Chief Executive Officer*

August 8, 2017

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

Dear Superintendent Salmon,

On behalf of City Schools, I want to commend you and your colleagues on the State Board for the tremendous amount of work you have invested in crafting Maryland's draft ESSA plan. As requested, I am pleased to provide you with City Schools' feedback before the plan is finalized.

As you know, City Schools worked during the 2017 session of the Maryland General Assembly to amend Senate Bill 871, the "Protect Our Schools Act," to require that the composite score established incorporate a methodology that compares schools that share similar characteristics, particularly the proportion of economically disadvantaged students.

We strongly believe that demographics matter and that a comparison of like schools ought to be available to the public – and especially to parents as they seek to choose which school is the best fit for their child. By providing a comparison of like schools, parents will be able to see which schools are spurring growth and making progress with certain student populations.

In our review of the State's draft ESSA plan, we see no mention of a comparison of like schools, as required under SB 871. We were encouraged at the State Board meeting on July 18 to hear President Smarick express his support for including such a comparison, and we look forward to its inclusion in the final draft. Additionally, we urge clear communication with stakeholders and families to enable them to fully understand the manner in which such groupings are construed.

We support the establishment of 10 as the N size, since it is consistent with what City Schools typically uses for our own analyses. While we understand the concern that some have raised about it being low, it allows us to account for more students; this in turn helps to ensure that schools are looking at their data even if the group is relatively small. City Schools still has a fair number of small schools in our portfolio, for whom using a larger N size (e.g. N=30) would lead to exclusion and less visibility of how certain students perform as a subgroup.

Our district has several concerns related to the proposed five-star ranking system. While the law requires a composite score that provides meaningful differentiation of schools under the accountability system, it is not clear that a five-star rating system with five equal groupings would accomplish this goal. City Schools strongly encourages the State Board to modify the system to reflect individual school characteristics and provide meaningful differentiation among schools. An alternative to the five-star system, and one which would allow even greater

differentiation, is the six-tier approach adopted by Massachusetts, whereby the top tier represents the state's top 10 percent of schools while the bottom tier is reserved for the lowest five percent.

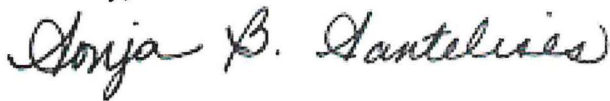
Please note City Schools' appreciation of the plan's efforts to establish Maryland as a state that recognizes that school improvement should be a focus for all low performing schools, not just Title I schools as ESSA requires. However, based on the fact that the schools will be determined through a relative comparison to all schools based on the academic performance and academic progress indicators, it is unclear how many non-Title I schools will make the list. Since this determination will be made using assessment-based indicators without any consideration for the demographic characteristics of schools, there is a strong likelihood that the list will be comprised primarily of schools with high concentrations of poverty.

Furthermore, with a longer list of low performing schools than ESSA requires, the question remains as to how the State will be able to support those additional schools and whether resources will be available. If the State doesn't provide meaningful supports to all schools on the list, identification of the additional schools will prove challenging. While Title I dollars are available to support schools deemed as such, the question of supportive funds – as well as monitoring and support from MSDE – for non-Title I schools remains.

Finally, with regard to the climate survey, City Schools encourages MSDE and the State Board to develop the survey with Maryland LEAs' existing surveys in mind. We believe there is real opportunity for a survey tool that provides the school climate measure needed as part of the state's SQ/SS indicator under the ESSA plan, but also allows districts to tailor it to their own use, -- such as teacher/principal evaluation, individual school planning, and other purposes. A useful approach would include a set of required items for the ESSA SQ/SS indicator, while also providing an opportunity for districts to include their own local items as well. We encourage MSDE and the State Board to consider carefully what items are necessary to address the SQ/SS indicator, to avoid an overly long climate survey that may be less likely to garner responses.

As always, thank you for your consideration of our concerns and for your continued support for City Schools.

Sincerely,

A handwritten signature in cursive script that reads "Sonja B. Santelises".

Sonja Brookins Santelises, Ed.D.  
Chief Executive Officer