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July 12, 2017

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

Dear Dr. Salmon:

We are writing on behalf of the Maryland Association of Boards of Education (MABE) to provide input to the Maryland State Department of Education (MSDE) on the draft Every Student Succeeds Act (ESSA) Consolidated State Plan approved by the State Board on June 27, 2017.

As you know, MABE has convened an Ad Hoc Committee on ESSA to support the Association's participation on MSDE's External Stakeholder Committee, and to facilitate MABE's engagement with the department, State Board of Education, and other educational organizations. MABE's Ad Hoc Committee greatly appreciated the recent opportunity to meet with Dr. Dara Shaw, MSDE's Research Director, on June 29 to discuss the draft State Plan. Following this meeting, the committee identified the following priority issues for the State Board's consideration.

First, MABE agrees that Maryland's proposed accountability system should prioritize outcomes for ALL students and student groups through goals that are ambitious and achievable. Therefore, MABE supports the ambitious annual academic improvement goals set forth in the State Plan to reduce by half the number of students across the State not demonstrating grade-level proficiency in English/Language Arts and mathematics by 2030.

#### Five-Star Ranking System

The State Board is proposing a five-star ranking system as a graphic depiction of school performance; a proposal made in the context of the state law's prohibition on reporting school performance using a letter grade model. At the same time, the law also requires the State Board to establish "a composite score that provides meaningful differentiation of schools under the accountability system." We believe the use of a five-star system, without significant enhancements to reflect individual school characteristics, would fail to satisfy this requirement.

The draft State Plan includes a proposed five-star rating system for schools to complement the percentile scores required under recently enacted State law. As the draft plan states, stakeholder feedback has 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." MABE supports this approach and,

more specifically, encourages the State Board's consideration of a rating system which reserves any 1 star designation for the subset of lowest-performing Title I schools; the schools in the lowest performing five percent of all Title I schools. These schools are required under ESSA to receive comprehensive supports and interventions and therefore a designation that indicates they are the highest priority schools for improvements in academic outcomes for students.

Similarly, beyond these highest need schools, the other tiers in the ranking system should include not only a number of stars (or other symbol) but also, more importantly, a brief descriptor of the school's overall performance and performance of groups of students requiring additional interventions and supports as required under ESSA. For example, a school could receive 4 stars overall, but one star could be highlighted to denote the need to address a low-performing student group, e.g. 3 green stars and one yellow or red star. In these ways, a ranking system could achieve the relative simplicity sought by all, and yet convey an appropriate degree of clarity and focus on the need for targeted interventions and supports. MABE believes that such a nuanced approach will avoid over-labeling schools as low-performing, especially in this time of initial implementation of a new statewide accountability system. This concern is highlighted by the transition underway in the area of English Learner Assessments and the recent significant increase in the level of performance required to exit English Learner status. MABE wholeheartedly agrees that "a school cannot succeed if all its students do not succeed;" however, we do not support an accountability system that would label a school as failing based on the performance of a small group of students on a newly developed or recently revamped standardized test.

#### Targeted Intervention Cycle

MABE supports an approach to identifying schools for targeted interventions and supports consistent with ESSA and the flexibility for local school-based strategies provided in the federal law and guidance and under Maryland state law.

Under ESSA, after a two-year period from the date of a plan's implementation, if a local board determines that student outcomes have not improved at a public school, the local board must consult with the school to develop additional strategies and interventions including funding community supports. The law specifies that MSDE is prohibited from requiring a local board of education to implement a specific intervention strategy during the two-year period. After a three-year period from the date of a plan's implementation, if MSDE determines that student outcomes have not improved at a public school and intervention is necessary, MSDE must collaborate with the local board in determining the appropriate intervention strategy. In addition, state law now authorizes the adoption of intervention and support plans which include a lengthening of the school year beyond 180 days or any other calendar modifications.

In this context, MABE supports the draft State Plan's proposal to identify schools for targeted interventions and supports where one or more student group(s) is performing the same or worse than the lowest performing five percent of Title I schools. However, the second criterion for identifying such schools, as proposed in the draft State Plan, would include any school with a student group that has not met its growth target for two or more years. This is both too short a

timeline and an unnecessarily broad definition of “low performance,” especially in light of the State Plan’s ambitious goals for annual growth in student performance. Under this provision, a student group may be making significant progress toward meeting their annual growth target, or missing that target by a very small margin. And yet, even if this level of growth and/or performance is sustained for two years, targeted interventions would be required, and, after several years, the school could be identified as a comprehensive improvement school. Again, MABE endorses the three-year timeline for identifying schools for targeted interventions and supports. This approach focuses on remedying the performance of one or more groups of students in any school if the group is performing at or below the level of the lowest five percent of Title I schools in the State after a three-year period. It also is consistent with ESSA and the reasonable concentration of state and local resources where they are needed most.

#### Well-Rounded Curriculum

MABE strongly supports the emphasis placed in ESSA and the draft State Plan on providing all students with a well-rounded curriculum in elementary, middle and high school. The draft State Plan appropriately defines the school quality indicator of access to a well-rounded curriculum as enrollment in Science, Social Studies, Fine Arts, Physical Education and Health (elementary school); and enrollment in Fine Arts, Physical Education, Health, and computational learning (middle school). However, the proposed high school definition is strictly limited to enrollment in Advanced Placement or International Baccalaureate, Career and Technology Education concentrator, or Dual Enrollment. MABE is concerned that the limited set of specific programs presumed to indicate a well-rounded curriculum does not include enrollment in magnet programs, such as STEM and Visual and Performing Arts, or school-sponsored athletic and extracurricular activities. Such programs and activities are clearly evidence of students enhancing an already well-rounded high school curriculum.

MABE encourages the State Board to recognize that the very limited set of options proposed in the draft State Plan ignores the universally well-rounded high school curriculum already mandated under State law. To be awarded a high school diploma in Maryland, a student must earn a minimum of 21 credits that include the following specified credits: English (4), Mathematics (4 - including a math class in each year of high school), Science (3), Social Studies (3), Fine Arts (1), Technology (1), Physical Education (.5), Health (.5), and either World Language (2), Technology (2) or completion of a CTE Program. In addition, Maryland has long required all graduates to complete a locally designed Student Service Program and Environmental Literacy Program. In these ways, Maryland’s high school graduation requirements ensure a well-rounded curriculum for all students, and these requirements should be embodied in the State Plan as they are for elementary and middle schools.

#### Survey

The concerns outlined above are an immediate priority as the State Board considers adjustments to the draft State Plan prior to submitting it to the U.S. Department of Education in September. Another concern identified by MABE relates to the prospective development of the climate survey in accordance with ESSA and Maryland State law. MABE looks forward to the State’s thoughtful consideration of the investment of local resources in existing climate surveys and the merits of

adopting a State climate survey that not only provides statewide baseline data but also allows for locally developed items.

Again, MABE greatly appreciates the many opportunities provided by you, your staff, and the State Board for meaningful engagement in the development of the State's ESSA Consolidated Accountability Plan. Please do not hesitate to contact MABE with any questions or concerns regarding our comments on the draft State Plan.

Sincerely,



Joy Schaefer  
MABE President



Jill Ortman-Fouse  
MABE ESSA Committee Chair

JS:JOF:kwb

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