

July 25, 2017



Maryland State Board of Education
Attn: Mr. Andrew Smarick
200 West Baltimore Street
Baltimore, MD 21201

Dear Mr. Smarick:

On behalf of Harford County Public Schools and the Harford County Board of Education, we would like to thank you for the opportunity to share our feedback regarding Maryland's Consolidate State Plan under ESSA. We support the consolidated plan with the areas of concern noted below.

1. The rating of all schools using the five-star rating system is a concern for HCPS. The ratings will easily translate to letter grades to the general public. If schools are rated with stars in various areas (e.g., academic achievement, academic progress), it may be difficult to explain to the public how a school achieved a cumulative star rating based upon their areas. In addition, if a school fails to meet a subgroup target, the school loses a star, which may not be transparent on how the data is reported. **HCPS recommends the reporting aspect to include if a school met or did not meet a particular target rather than using the five-star rating system.**
2. The plan does not address how schools perform academically in comparison to schools of similar demographics across the state. Instead, schools would be publically rated and ranked according to their performance in the county. Comparing a specific school's academic performance to the district performance may not be appropriate for some of our schools that face significant challenges. **HCPS recommends that schools are rated according to their academic performance with schools of similar demographics across the state.**
3. Data has not been provided to LEAs indicating what percentage of schools across the state will fall within each star rating. Decisions regarding this matter are being made without reviewing the data first. In addition, the standards for many of the metrics have not yet been provided so we are unsure as to how schools will score on some of these metrics. **HCPS recommends MSDE provide summary data (where possible) of how schools across the state will be rated in each area so LEAs can begin to discuss future decision making and planning.**
4. At the elementary and middle school levels, PARCC scores constitute 45% of the school's model as measured by proficiency and student growth. At the high school level, PARCC

- scores are only 20% of the model since there are no growth metrics at this level. The weights are inconsistent across all levels, and the weights are much higher at the elementary and middle school levels. **HCPS recommends reviewing the percentages at the all levels to ensure consistency.**
5. The change of the *n-size* to ten students is more reasonable than having the previous *n-size* of five students. However, ten students comprising of a subgroup may not provide the entire picture of a specific school population. **HCPS recommends the *n-size* be set to twenty students so the data is more reliable.**
 6. The use of student grades in courses at all levels is very concerning due to the subjectivity of how grades are earned from system to system. In addition, student progress is not reported using a graded structure in the Unified Arts at the elementary level in HCPS. As such, HCPS would not be able to quantify the number of fifth graders passing these particular courses with this metric since grades are not provided. **HCPS recommends eliminating the use of grades from this model in all levels.**
 7. The shift from schools requiring to meet a 94% attendance rate to only measuring chronic absenteeism is also very concerning. There are a myriad of reasons as to why a student may be chronically absent, such as medical or religious reasons. However, there is no provision or flexibility to exempt students with lawfully, excused absences from this measure. Focusing only on chronic absenteeism may lead school administrators away from focusing on the overall attendance rate and students who miss less than twenty day of schools. **HCPS recommends this metric to be renamed as “Absenteeism” and weighted as 10% instead of 15%. In addition, HCPS recommends 5% of this metric include schools meeting the attendance rate of 94% and the remaining 5% to include students chronically absent with the provision that students with severe medical issues and other lawfully, excused absences not count against the school provided proper documentation is provided to MSDE.**

Thank you again for the opportunity to provide feedback for refinement of the state’s plan. If we can be of any further assistance, please do not hesitate to contact us.

Sincerely,



Barbara P. Canavan
Superintendent



Joseph L. Voskuhl
President, Board of Education