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Date: Wed, Aug 2, 2017 at 5:38 PM
Subject: Re: Fr. K. Rigler re ESSA input
To: Mary Gable -MSDE- <mary.gable@maryland.gov>

Thank you for this opportunity to comment on the Maryland State ESSA Plan June 2017 Draft 2, particularly as it relates to gifted and talented students and their teachers/educators.

Background

Maryland has a strong codified foundation for quality education of gifted and talented students in the Maryland Code and in COMAR. COMAR 13A.04.07 Gifted and Talented Education sets minimum standards for local education agencies (LEAs) in serving their gifted and talented students. However, as the work of the Maryland State Advisory Council for Gifted and Talented Education and other groups has made clear, implementation of COMAR 13A.04.07 has been spotty across Maryland since its adoption in 2012.

ESSA requires that state plans address identification and services for students with specific learning needs, **including students who are gifted and talented**, and teacher/educator training for serving these students. Most importantly, ESSA also provides federal funding for doing this. A Maryland State ESSA plan which includes strong, research-based provisions regarding education of gifted and talented students will play a central role in ensuring that LEAs implement COMAR 13A.04.07 with fidelity.

Comments on Maryland State ESSA Plan Version 2, June 2017

1. Assessments used to measure “academic achievement” and “growth” for gifted/advanced students should have a ceiling sufficiently high to what what the gifted student knows initially and then what growth that student has made.

Maryland’s Accountability Framework (Appendix D, pp. 87-88 and pp. 90-91) relies on PARCC assessments and/or the MSSA. But on-grade level PARCC assessments are not adaptive and may not have a ceiling high enough to measure what a gifted/advanced student knows and what that student has learned in the course of a year. (Similarly, an on-grade level PARCC test may not have a floor that shows what a struggling student knows or has learned.)

2. Scores of 4 and 5 on PARCC or the equivalent on MSSA should be reported, disaggregated and used separately as indicators of performance and academic growth in students.

3. High achieving students should be a a specific subgroup in the Maryland accountability system with results reported separately and disaggregated.

4. The Maryland State Plan should set annual measurable objectives for students at the ‘advanced’ level.

5. In Appendix D p. 93, 10% is given for percent of students achieving certain scores on an AP or IB exam. While AP and IB are not designed to be programs for the gifted, these measures do give some indication of whether advanced material is available for gifted students.

6. Under D. Title II, Part A, p. 50, “Improving Skills of Educators”, the Maryland plan specifies that the State will assist the LEAs in training teachers and principals and other school leaders to identify students with “specific learning needs, particularly children with disabilities, English learners, students who are gifted and talented and students with low literacy levels.”

The State Plan should explicitly state that the professional training will be in sufficient depth to be meaningful and truly useful to educators seeking to identify these special needs students and require LEAs to report what this training is.

7. The State Plan should also require LEAs to report specifically what collaboration the LEA has had with internal and external stakeholder groups who interact with students with specific learning needs including students who are gifted and talented.

8. The Maryland State Plan should require each LEA to report how much of its Title I funds are used to identify and serve their gifted/advanced students as allowed by ESSA and how these funds are used.

9. The wording on p. 6, Title I. Part A.2 (“Eighth Grade Math Exception), ii is not clear. It should be written so it is clear that middle school students taking a “high school” course in middle school will take the high school end-of-course assessment for the course in the year that they completed that high school course. This is an important provision of the Maryland plan and should be clearly stated.

Looking farther into the future:

Maryland should explore using computer adaptive assessments for state assessments. ESSA authorizes grant funding to states to develop such assessments.

Computer adaptive assessments will allow teachers to get a more accurate idea of the knowledge and growth of each student at every achievement level and will therefore help guide instruction of all students.

Thank you for important work you are doing and for the opportunity to offer comments on the Maryland ESSA Plan Version 2.

Katherine C. Rigler